Bacteriological Sample Site Plan

Lemons Campground PWSID #0000007

Last Updated: March 22, 2016

Table of Contents

Plan Objective / General Information	3-5
Number of Samples Required	6
Selecting Sampling Sites	7
System Map	
Sampling Procedure	10
Faucets to Avoid	11
Bacteriological Sample Form.	12
Bacteriological Sample Log.	
Actions to be taken when a sample is coliform positive	15
Sampling Activites during weekends and holidays	16
Treatment Technique Triggers -Level Assesments	16
Treatment Technique Triggers - Level 2 Assesments	17
Actions to be taken when the E-Coli MCL is exceeded	18
Tier1 Public Notice "Boil Water"	19
Actions to be taken for a Treatment Technique Violation	20
Tier 2 public notice(s)	21-22
Actions to be taken for a Monitoring /Reporting Violation	23
Tier 3 public notices	24-25
Appendix A SeasonalStart up checklist	26
Appendix B – Level 1 Assesmet Form.	

Purpose/Objective

The Tennessee Department of Environment and Conservation, Division of Water Resources regulations require that bacteriological samples are to be collected according to a written sample siting plan. This plan is to ensure that collection sites are representative of water throughout the distribution system. Samples will be collected from areas used by all customers and will include...

- Residential areas (at least 30%)
- Dead end lines
- Low use areas
- Commercial areas
- Areas near storage tanks

Sampling sites will be distributed to ensure that no area served by the system is neglected during the year. The justification for selecting sampling sites is to aid our operator and manager in understanding the bacteriological quality of the water throughout the system and to monitor and evaluate the quality of the water consumed by all the users of the system.

General System Information

The official name and address for this system is
Lemons Campground 6464 River Road Somewhere, TN 393939
The PWSID (Public Water Supply Identification Number) number for this system is $\underline{TN0000007}$
The population served by this system is30
The Person(s) responsible for reporting to the Division of Water resources and keeping the plan updated is <u>John Johnson, Owner</u> .
Date of last plan updateDecember 25, 2015

The Lemons Campground PWSID #s: 0000007 provides drinking water to 13 tent and RV camp sites, a bathhouse and the Campground Office. The Campground is operated seasonally, opening on May 01 and closing October 31 of each year. The campground averages 30 customers per day. Historically the month of August is our busiest month when the campground generally experiences full occupancy each day.

Water is supplied by a well on site which has been classified as a true ground water source. Although not required, and in the interest of public health, we have installed a residential sized ultraviolet lamp. The device is located just downstream of the pressure tank in our well house. Water is supplied to all campsites, the main office and the bathhouse through a 2 inch PVC water line extending approximately ¼ mile throughout the campground. Two flush valves are located at distill ends of the campground near sites 9 and 10. A spigot is located inside the well house from which raw water from the well may be obtained if needed.

Since our system is seasonal, we are required to submit certification of completion of the State mandated start-up checklist including the results of a negative bacteriological sample prior to our opening on May 01 each year. The system is shock chlorinated, flushed and sampled each year for this purpose. The start- up procedure should be conducted no more than 30 days prior to the start of the season. A Start- up checklist is included in Appendix A.

The system is required to collect one (1) routine bacteriological sample per month. Sample sites locations are rotated between the two distil ends of the system at sites 9 and 10. In the event of a positive sample we are required to collect three repeat samples within 24 hours of notification.

Or-----

The Division of Water Resources has approved and granted our system a reduction to quarterly monitoring. We are required to collect one (1) routine bacteriological quarterly to include the month of highest demand which is August. We will collect samples during May, August and October. Sample sites locations are rotated between the two distil ends of the system at sites 9 and 10. In the event of a positive sample we are required to collect three repeat samples within 24 hours of notification. Additionally we are required to collect three samples during the month following any positive sample and are subject to increased monthly monitoring if certain conditions exist

The Lemons Campground primarily utilizes the State of TN Health Department laboratory for bacteriological sample analyses. If a sample needs to be analyzed after hours, on a weekend or holiday, the Broadview Utility District laboratory will be utilized.

Special purpose samples are collected during repairs, in response to complaints, or for other maintenance reasons. Collection of these types of samples is necessary to ensure that coliform bacteria have not entered the distribution system as a result of events such as installation of mains, main line repair or routine maintenance. Special purpose samples cannot be included in compliance or assessment trigger calculations. Special purpose samples are collected in addition to any samples collected in accordance with this plan for compliance with the Revised Total Coliform Rule.

This plan contains examples of responses to treatment triggers which may require level 1 and or level 2 assessments to be conducted. It is anticipated that the systems certified water and owner will conduct any required level 1 assessments. The Lemon Campground has made arrangements with Broadview Utility operators who are qualified to conduct a level 2 assessment if needed. The plan also contains example public notification documents that can be used in if needed.

John Johnson, owner and Certified Operator, is responsible for insuring that proper sampling procedures are followed and that samples are collected in accordance with this plan. John Johnson will annually review the sampling plan and update the plan when the population served increases sufficiently to require an increased number of samples and at any time significant changes to the system are made impacting hydraulic flows in the system. A copy of this plan will be kept in the Campgrounds main office..

Number of Samples Required

The number of samples to be taken by Lemons Campground is determined by the Tennessee Department of Environment and Conservation, Division of Water Resources, Rule 0400-45-1-(5) -(7).

Routine samples

Presently, based on a population served of approximately 30 Lemons is required to take one (1) routine samples each month.

Our system can take the required number of samples, or more than is required. The number of samples our system will take is one (1) each month. The number of routine samples required the month following a total coliform-positive sample is one (1).

Or

Routine samples

The Division of Water Resources has approved and granted our system a reduction to quarterly monitoring. We are required to collect one (1) routine bacteriological quarterly to include the month of highest demand which is August. We will collect samples during May, August and October. Our system can take the required number of samples, or more than is required. The number of samples our system will take is one (1) each quarter in the designated months.

Additionally, the number of routine samples required the month following a total coliformpositive sample is three (3) and are subject to increased monthly monitoring if certain conditions exist

Repeat samples

If a routine bacteriological sample is total coliform-positive, the number of repeat samples required is three (3). The system must collect at least one repeat sample from the sampling tap where the original total coliform-positive sample was taken, and at least one repeat sample at a tap within five service connections upstream and at least one repeat sample at a tap within five service connections downstream of the original sampling site. When a positive sample occurs at the end of line one sample at the site of the positive sample and two samples upstream will be collected. A set of three (3) repeat samples will be collected for each positive sample. The repeat sampling procedure will continue until all samples are total coliform negative or a treatment technique trigger has been exceeded. Reference page 11 for additional actions required in the event of a positive sample.

The person(s) responsible for reporting to the Division of Water Resources is John Johnson.

The Division of Water Resources can be contacted at the following numbers:

Every Environmental Field Office 1-888-891-8332 (XXX) 891-8332

Selected Sampling Sites

The Lemons Campground will collect (one (1) routine sample per month or one (1) routine sample per quarter) as indicated below. If a primary sampling site is not available, a secondary sampling site will be selected from the list for routine monitoring. Sampling will be conducted as follows.

Samples are to be taken from each designated site throughout the season and be alternated each monitoring period to ensure all areas of the system are represented during the course of a year.

Monthly				
First Week	Number of Samples:	1	Zone(s)	1
Next month on sched	dule			
Monthly				
First Week	Number of Samples:	1	Zone(s)	2
Sample sites will be	alternated from Zone 1-We	est to Zon	e 2-East each sa	ampling period
OR				
For Quarterly Monit Monthly	toring during the months of	f May, Au	gust and Octob	per
•	Number of Samples:	11	Zone(s)	1
Next month on scheo	dule			
Monthly				
First Week	Number of Samples:	1	Zone(s)	2
Sample sites will be	alternated from Zone 1-We	est to Zon	e 2-East each sa	ampling period
Primary Routine Tot	al Coliform Sampling Sites	s:		

Map	Specific Addresses or GPS Coordinates	Zone	Water
Site ID			Source
9	End of line west side of park	1-west	Well
8	Near end of line west side of park	1-west	Well
7	Near end of line west side of park	1-west	Well
10	End of line east side of park	2-east	Well
11	Near end of line east side of park	2-east	Well
12	Near end of line east side of park	2-east	Well

Alternative Routine Total Coliform Sampling Sites: (to be used if primary sites are not available or included in sample rotation)

Map	Specific Addresses or GPS Coordinates	Zone	Water
Site ID			Source
6	Near end of line west side of park	1-west	Well
13	Near end of line east side of park	2-east	Well

Sample site for Compliance with the Ground Water Rule Source Water Monitoring (if required)

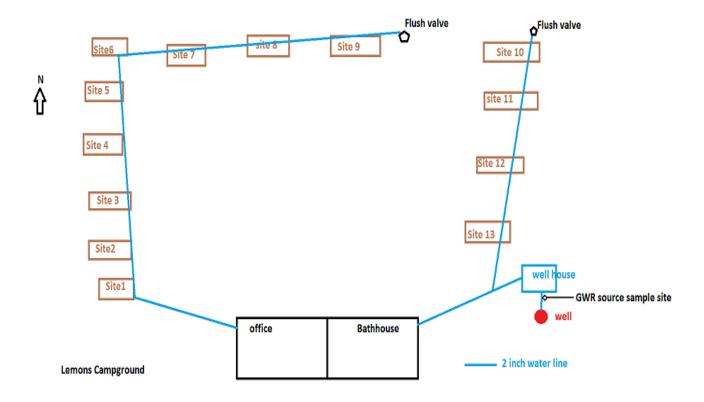
GWR	At well house	Na	Well

The goal should be to collect all required samples at the beginning of the first week in the monthly monitoring period. This is to allow ample time to collect another sample should one arrive at the laboratory and not be able to be analyzed. (i.e. leaked in transit, out of holding time, lab accident, etc...). Samples must be analyzed within 30 hours of collection.

If there is a total coliform or E. coli positive sample, three repeat samples will be collected within 24 hours of notification. Reference page 16 for additional guidance.

If any routine or repeat sample is E.coli positive, the system must notify the state by the end of the day when the system is notified of the result.

Distribution System Map with Sample Sites



Sampling Procedure

- 1. Review the sample siting plan to determine where and when samples are to be taken.
- 2. After arriving at the sampling site, remove any attachments on the faucet.
- 3. Consider the use of a sodium hypochlorite spray solution or flaming to disinfect the faucet. Flaming should not be used on plastic faucets.
- 4. Turn the water on and let it run for until the temperature stabilizes.
 - Flush out the customer lines, and
 - Ensure that the water being sampled is from the distribution lines, not the plumbing fixture. (A thermometer can be used to determine when water is being drawn from the distribution system and not the plumbing fixture. The water temperature will stabilize once all the water from the fixture has been flushed out and the water flowing from the faucet is coming from the distribution system.)
- 5. Adjust the flow from the faucet to a slow, steady stream.
- 6. Take a sample of water flowing from the tap and determine and document the free chlorine residual.
- 7. Open the laboratory supplied container used to take the bacteriological sample. The use of latex gloves may be used to lessen the possibility of contamination.
- 8. Do not touch the inside of the bottle or lid.
- 9. Do not set the lid down.
- 10. Do not rinse the bottle out.
- 11. Grasp the container near the bottom and quickly place it under the flowing stream.
- 12. Fill the bottle to the neck or indicated fill line. Do not overfill. Collect at least 100 mL of water, this is the volume the laboratory must have for testing.
- 13. Remove the sample container from the flow as soon as it is filled. SEAL THE CONTAINER IMMEDIATELY.
- 14. Turn off the water and replace any fixtures or attachments that were removed previously.
- 15. Fill out the bacteriological sample slip. Instructions are included on page 12.
- 16. Place the container and completed forms in the shipping box.
- 17. Insure that the sample is delivered to the laboratory in a timely manner. Analysis must be initiated with within 30 hours from the time sample is collected.
- 18. Record sampling event and information in the bacteriological sampling log. Refer to page 14.

Faucets to Avoid

Avoid taking samples at these faucets if at all possible.

- Unprotected Outdoor Faucets
- Frost-proof Faucets

If you cannot avoid these, be sure to use good sampling techniques. Avoid dust, obvious contamination, splashing rain, snow and other possible sources of contamination, such as:

- An indoor faucet connected to a pressure tank, or water heater.
- A new faucet.
- A hot water faucet.
- A recently repaired faucet.
- Faucets with threaded taps.
- Mixing faucets.
- Sites with a higher-than-usual possibility for bacterial contamination.
- Swing/swivel faucets.
- Faucets positioned close to a sink or the ground. (It must be high enough to keep it from touching the sampling container.
- Leaky faucets or faucets which allow water to seep around the valve stem.
- Faucets that supply areas, such as janitorial or commercial sinks, where bacterial contamination is likely.
- Faucets that have aerators. (If such faucets are to be used, the aerators should be removed before a sample is collected.)

What does this all mean? Avoid any faucet that will threaten to contaminate a sample. The idea is to sample the water in the distribution system, not necessarily the condition of the plumbing fixture. You may not always be able to avoid all these types of faucets. If you have to take a sample from one of these faucets, you should exercise extreme care and use good sampling techniques including spray disinfection or flaming of the faucet where appropriate.

Bacteriological Sample Slip Information

Sample Information Slip Figure 1

		1	NEG POS								DATE REPORTED		ANALYST
(a)	(b)	TOTAL		3	1	0 0		3	0	9	EXAMINATION REQ	IFOTED	SAMPLE SOURCE
SAMPLE TIME (MT) SAMPLE TY		FECAL		3	0	1 3	16	3	1	3	☐ TOTAL COLIFOR	M	SWIMMING POOL
(c) (d)	(e)	E. COLI		3	0	1 3	1	3	1	3	☐ FECAL COLIFOR ☐ ENTEROCOCCU	3	□ WELL □ SPRING
LOCATION CODE REPEA	T SAMPLE LOCATION	L. COLI L	ANALYSIS					AB ID			EXAMINATION RAN-		
(f) SAME (g)	ABOVE BELOW		3 5 1			0	0	0	0	5	COPY OF RESULTS		
WATER SYSTEM NAME/PRIVATE O	OWNER (h) PHONE	(i)			1	ABOF	RATO	RYL	JSE (ONL	Mary Control of the C		
ADDRESS (i)						TOTAL	COL	IFOF	RM /	1001	ML	UNSA	TISFACTORY FOR ANALYSIS
SAMPLE LOCATION (1-)		COUNT	Y 00			SCH	RICH	HA C	COLI	/10	OML	☐ SA	MPLE OVER 48 HOURS OL
SAMPLE LOCATION (k)		000111	(I)			ECAL	COL	IFOR	RM/	1001	ML	□ LE	AKED IN TRANSIT
SAMPLE COLLECTOR (m)	BILLING	G CODE				ENTER	ROCO	CCL	JS / 1	100	ИL		SUFFICIENT QUANTITY
R NAME (n)						RESUL	TS N	AYI	BE IN	IVAI	LID - SAMPLE		ONFLUENT GROWTH -
e P						30 -	48 HF	RS. C	OLD I	NHE	EN RECEIVED		TOO NUMEROUS TO COUN
e O ADDRESS						SUBMI	T4R	EPE	ATS	AM	PLES MARK AS "R		
CITY	STATE	3.35	ZIP										
PH-1575 TENNESSEE DI LABORATOI	EPT. OF HEALTH						XIII S			1			RDA-11

- a. **PWSID number**. XXXX Water System's PWSID # is 0000XXX. In order to get credit for the sample, the PWSID number must be correct.
- b. <u>Sample date</u>. Record the date the sample is collected. Example: August 22, 2002 would read 082202.
- c. <u>Sample time</u>. Record the time of day in military time. 8:30 a.m. would be recorded as 0830. 1:30 p.m. would be recorded as 1330.
- d. Sample type. Sample types are recorded as follows:

D – Routine S – Special

R - Repeat Q - Quality Control N - New lines F - Fix or Repair

Failure to record the correct sample type can result in a monitoring requirement violation. Most samples will be coded as a "D" for a routine sample. Follow-up samples immediately following a positive routine sample are repeat samples and are coded as "R".

- e. <u>Chlorine Residual</u>. All systems that disinfect their water must record the chlorine residual when coliform samples are collected. Chlorine residuals should be reported to the nearest one tenth of a milligram per liter or one tenth of a part per million.
- f. <u>Location code</u>. This 3-digit block would only be used when repeat samples are collected. The laboratory will furnish the numbers to be put in these blocks.

- g. Repeat Sample Location. Same
 Above
 Below
 Only used when collecting repeat "R" samples.
- h. Water System Name/Private Owner. Provide the name of the Water System or Utility District where the sample was collected.
- i. **Phone**. Provide a daytime telephone number to be called by the laboratory if they need to contact you about the sample.
- j. <u>Address</u>. Provide the complete mailing address of the Water System from which the sample was collected.
- k. <u>Sample Location</u>. Provide sufficient information so that you can return to the sample site for repeat samples if necessary and sufficient information that the sample site can be identified on your sampling site plan.
- 1. <u>County</u>. Record the county where the public water system is located.
- m. **Sample Collector**. Record the name of the person who actually collected the sample.
- n. <u>Name, Address, City, Zip</u>. Please record the full address of the person or organization the coliform sample results should be mailed to. Make sure that this information is printed clearly because the laboratory uses this information to return the results to you.

Bacteriological Sample Log

Date Sample Taken MM/DD/YY	Time Sample Taken (Military time)	Sample Location (Describe, i.e. Cedar Lodge Kitchen Sink)	Chlorine Residual	Date Sample Mailed MM/DD/YY	Date Sample Results Reviewed	Sample Results Positive (+) Negative (-)	If Sample * Results +, Repeat Samples Taken (Yes=Y)	Date Public Notice Given

Military Time

8:30 a.m. is 0830 in MT (essentially clock time) 1:30 p.m. is 1330 in MT (clock time plus 12)

*Show Date, Time, Place, and provide for Results of each repeat sample taken on this log.

Actions to be taken if a Sample is Total Coliform-Positive

Should one of the routine samples be total coliform-positive, we are required to take a set of three (3) repeat samples. The set of repeat samples will be taken as follows:

- at least one of the repeat samples must be taken from the sampling tap where the original total coliform-positive samples was taken;
- at least one of the repeat samples must be taken at a tap within 5 service connections downstream from the original sampling site;
- at least one of the repeat samples must be taken at a tap within 5 service connections upstream from the original sampling site;
- the complete set of repeat samples must be taken within 24 hours of the system being notified of a positive coliform result, or when instructed to sample by the Division of Water Resources:
- the entire set of repeat samples must be taken on the same day.
- If a total coliform-positive sample is at the end of the distribution system, or one service connection away from the end of the distribution system, the system must still take all required repeat samples. One sample at the original positive site and two upstream samples within 5 service connections will be collected.
- To comply with the requirements of the Ground Water Rule, one untreated source water sample must be collected within 24 hours of notification. This sample shall be coded "s" for special and is in addition to the three required repeat samples.

Should one of the repeat samples be positive, another set must be taken.

Repeat samples must be taken until:

- total coliforms are not detected in one complete set of repeat samples, or
- the system exceeds the total coliform treatment technique trigger during the month and notifies the State Department of Environment and Conservation, Division of Water Resources.
- If any routine or repeat sample is E.coli positive, the system must notify the state by the end of the day when the system is notified of the result.

If on reduced quarterly sampling and in the event of a TC positive sample, three routine samples are required the following month.

Increased monitoring to monthly is required if:

- A level 2 assessment or two level 1 assessments are triggered in a rolling 12 month period.
- An E.coli MCL violation.
- A coliform treatment technique violation.
- Two RTCR monitoring violations in a rolling 12- month period.
- One RTCR monitoring violation and one level 1 assessment in a rolling 12 month period.

Sampling During Weekends and Holidays

Routine should be taken on Mondays and Tuesdays to avoid a problem with repeat samples. This should allow ample time for repeat samples to be collected before the weekend if they are required. If a holiday should occur, which could cause a problem with either routine or repeat sampling being submitted to the state laboratory, samples must be taken to the Broadview Utility District laboratory for analysis. Planning ahead, and following these guidelines, should avoid any sampling problems associated with weekends or holidays.

Should it not be possible to collect repeat samples and submit them for analysis within the required 24-hour period because of a holiday or weekend, the system will provide for a "boil water notice" to be issued until sufficient samples can be collected and analyzed to verify that the contamination has been eliminated. Refer to page 17 for an example of a "boil water notice".

Treatment Technique Triggers

Level 1 Assessments

A level 1 assessment is required to be conducted as soon as practical but no later than 30 days of the following events. A Division of Water Resources Level 1 Assessment form must be completed and submitted to the Division of Water Resources. Refer to Appendix B for Level 1 Assessment forms.

- For systems, which take less than 40 samples during a month, the system has exceeded the Level 1 treatment technique trigger if the system has more than one total coliform-positive sample, including repeat samples during a month.
- The system fails to collect every required repeat sample after any single total coliform positive sample.

Level 1 assessment for a NCWS must be conducted by a licensed certified operator or the owner. John Johnson owner and certified operator will conduct Level 1 assessments if a trigger is exceeded. A State approved Level 1 Assessment form must be completed and submitted to the Division of Water Resources within 30 days of the trigger exceedance. Any sanitary defects or deficiencies must be corrected within 30 days of the trigger exceedance or in accordance with an approved schedule from the Division of Water Resources.

Treatment Technique Triggers

Level 2 Assessments

A level 2 assessment is required to be conducted as soon as practical but no later than 30 days of any of the following events.

- An E.Coli Maximum Contaminant Level (MCL) violation
- A second Level 1 assessment trigger within a rolling 12 month period.

Level 2 assessments for all systems must be conducted by an licensed operator who is certified to at least the same level as the public water system being assessed and who has completed an approved level 2 training certification course from the Division of Water Resources. A system serving a population of less than 50,000 must use a 3rd party assessor. The Lemons Campground has made arrangements with Broadview Utility operators who are qualified to conduct a level 2 assessment if needed.

A Division of Water Resources Level 2 Assessment form must be completed and submitted to the Division of Water Resources within 30 days of the trigger exceedance. Any sanitary defects or deficiencies must be corrected within 30 days of the trigger exceedance or in accordance with an approved schedule from the Division of Water Resources.

E.coli Maximum Contaminant Level (MCL) Violations

An E.coli MCL violation occurs when any of the following conditions exist.

- An E.coli positive repeat sample follows a Total Coliform positive routine sample.
- A Total Coliform positive repeat sample follows an E.coli positive routine sample.
- A system fails to take all required repeat samples (3) following an E.coli positive routine sample.
- A system fails to test for E.coli when any repeat sample tests positive for total coliform.

Actions to be taken if an E. coli-Positive Sample is involved in the Violation (A Violation Requiring a Tier 1 Public Notification)

If any repeat sample is E. coli -positive or any repeat sample following an E. coli-positive routine sample is total coliform-positive:

• Report the violation to the State no later than the end of the day when the system was notified of the results, unless the system is notified after the Department office is closed, in which case it must notify the State before the end of the next business day.

Person to Contact:	<u>Mr. State Inspector</u> at the <u>Local</u> Environmental Field Office
Telephone:	or 1-888-891-8332

- Notify the public using this procedure:
 - Furnish a copy of the notice to customers via direct delivery and or the local radio and television stations served by the public water system as soon as possible and or hand deliver and post notice as appropriate, but no later than 24 hours after the violation;
- Refer to the EPA Public Notification Handbook for specific content and delivery requirements. An example PN is contained on the following page.
 - The notice must contain the language shown in the example notice on the next page;
 - The system may want to describe what is being done to correct the problem:
 - Total number of samples taken,
 - Total number of positive samples,
 - Problem areas,
 - Mains are being flushed, etc.
- A Level Two Assessment must be conducted within 30 days of the E. coli positive sample.

Tier 1 PN for Violating the E. coli MCL

DRINKING WATER WARNING E. coli is Present in Lemons Campground Water

E. coli is Present in Lemons Campground Water BOIL YOUR WATER BEFORE DRINKING OR USING

Our water system detected *E. coli* bacteria in a pipe of our distribution system. As our customers, you have a right to know what happened and what we are doing to correct this situation. On April 4, 2016, we learned that coliform bacteria were present and one of our routine samples collected on April 2, 2016, was total coliform-positive (TC+). As required by the Revised Total Coliform Rule, one of our follow-up steps was to collect repeat samples at and near the location where the TC+ sample was originally taken. One of these repeat samples collected on April 5 tested positive for *E. coli*. We are now conducting additional sampling to determine the extent of the problem and are conducting a thorough investigation to determine the source of the contamination.

What should I do?

DO NOT DRINK THE WATER WITHOUT BOILING IT FIRST. Bring all water to a rolling boil, let it boil for one minute, and let it cool before using it. Boiling kills bacteria and other organisms in the water. You may also use bottled water. Use boiled or bottled water for drinking, making ice, preparing food and washing dishes until further notice.

Also, if you have a severely compromised immune system, have an infant, or are elderly, you may be at increased risk and should seek advice about drinking water from your health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791. If you have specific health concerns, consult your doctor. We are also providing regular updates on this situation on Channel 22 or Radio Station WZYX (90.3 FM).

What does this mean?

Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps and associated headaches. *E. coli are bacteria whose presence indicates that the water may be contaminated with human or animal wastes.* Human pathogens in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a greater health risk for infants, young children, some of the elderly, and people with severely-compromised immune systems. These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?

We are conducting a thorough investigation to determine the source of the contamination and will be working with the State to implement corrective actions to ensure that our water supplies are protected against contamination. We will keep you informed of the steps we are taking to protect your drinking water and will provide information on any steps you should be taking. We will inform you when tests show no bacteria and you no longer need to boil your water. We are also providing regular updates on this situation on Channel 22 or Radio Station KMMM (97.3 FM).

For more information, please contact John Johnson, manager of Rural Utility District, at (555) 555-1234 or write to 2600 Winding Rd., Townsville, TM 12345.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by Rural Utility District

12/25/2015

State Water System ID# Tn 0000007

Treatment Technique Violations

A treatment technique violation occurs when any of the following conditions occur.

The system exceeds a treatment technique trigger and then fails to conduct an assessment or complete corrective actions within required timeframes.

Actions to be taken in the event of a Treatment Technique Violation (A Violation Requiring a Tier 2 Public Notification)

A public water system that has violated the treatment technique for total coliforms by failing to conduct an assessment, complete corrective actions or fails to complete the approved seasonal start up procedure must;

•	Report the violation to the State no later than the end of the next business day after system learns of the violation.
	Person to Contact: Mr. State Inspector at the Local Environmental Field Office Telephone: or 1-888-891-8332
	• A Tier 2 Public Notice must be issued:
	Cier 2 notices must be issued within 30 days of learning of the violation.
•	Refer to the EPA Public Notification Handbook for specific content and delivery
	requirements. Examples are contained in the next two pages

- Notify the public using this procedure:
 - o Furnish a copy of the notice to the customers served by the public water system via mail or other direct delivery or posting as soon as possible, but no later than 30 days after the violation;
 - The notice must contain the following language:
 - The notice must contain the language shown in the example notices on the next pages;
 - The system may want to describe what is being done to correct the problem:

Tier 2 PN for Failure to Perform a Level 1 or 2 Assessment DRINKING WATER NOTICE

Lemons Failed to Conduct an Assessment of the Facility and Distribution System

Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the distribution system. In one sample we collected on June 12, 2016, and one sample collected on June 16, 2016, we found coliforms, indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct an assessment to identify problems and to correct any problems that are found. We were required to conduct a Level 1 assessment within 30 days of learning of the second total coliform-positive (TC+) sample. A Level 1 assessment is a study of the water system to identify potential problems and determine (if possible) why total coliform bacteria have been found in our water system. As our customers, you have a right to know what happened and what we are doing to correct this situation. As required by the Revised Total Coliform Rule, we failed to conduct the required Level 1 or 2 assessment within 30 days, and have therefore, violated a requirement of the Revised Total Coliform Rule.

What does this mean?

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours. Failure to conduct an assessment to identify the sanitary defect that triggered the assessment has the potential to cause distribution system contamination. *Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches.* Failure to perform the assessment prolonged the risk of fecal contamination of our distribution system water. While we have not detected any evidence of fecal contamination in our distribution system, we are committed to correcting the deficiency to eliminate the potential threat of contamination.

What should I do?

- You do not need to boil your water or take other corrective actions. However, if you have specific health concerns, consult your doctor.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from their health care providers about drinking this water. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791.

You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours. We will announce any emergencies on Channel 22 or Radio Station KMMM (97.3 FM).

What is being done?

We have since completed the Level 1 assessment and identified the cause of the sanitary defect; damage to the storage tank. We are implementing the corrective action plan established by the State. Under this plan, the damage will be repaired and the tank will be disinfected by August 31, 2016.

For more information, please contact John Johnson, manager of System B, at (555) 555-1234 or write to 2600 Winding Rd., Townsville, TM 12345.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail. This notice is being posted by System B. State Water System ID# TN 1234583. Sent: 8/10/2016

Example of a Tier 2 PN for Failure to Perform Corrective Action DRINKING WATER NOTICE

Lemons Failed to Perform Corrective Action Following an Assessment of the Facility and Distribution System

Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, waterborne pathogens may be present or that a potential pathway exists through which contamination may enter the distribution system. We found coliforms, indicating the need to look for potential problems in water treatment or distribution. When this occurs, we are required to conduct assessment(s) to identify problems and to correct any problems that are found. This past summer, we were required to conduct a Level 1 assessment. We completed the required Level 1 assessment and identified the cause of the sanitary defect to be damage to the storage tank. While we failed to correct the sanitary defect within the required timeframe, we are implementing the corrective action plan established by the State. As our customers, you have a right to know what happened and what we are doing to correct this situation. As required by the Revised Total Coliform Rule, we failed to complete the corrective action within the required timeframe, and have therefore, violated a requirement of the Revised Total Coliform Rule.

What does this mean?

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours. Failure to correct the identified defect that was found during the assessment has the potential to cause distribution system contamination. *Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches.*

What should I do?

- You do not need to boil your water or take other corrective actions. However, if you have specific
 health concerns, consult your doctor.
- If you have a severely compromised immune system, have an infant, are pregnant, or are elderly, you may be at increased risk and should seek advice from their health care providers about drinking this water. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791.

You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours. We will announce any emergencies on Channel 22 or Radio Station KMMM (97.3 FM).

What is being done?

Since being informed of the failure, we have begun to correct the sanitary defect identified during the Level 1 assessment. During the assessment, the sanitary defect was determined to be damage to the storage tank. We are in communication with the State and have modified the corrective action plan's schedule to repair and disinfect the storage tank.

For more information, please contact John Johnson, manager of System B, at (555) 555-1234 or write to 2600 Winding Rd., Townsville, TM 12345.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being posted by System B. State Water System ID# TN1234583. Sent: 9/20/2016

Monitoring and Reporting Violations

A Monitoring or Reporting violation occurs when any of the following conditions exist.

- A system fails to collect all routine or additional routine samples
- A system fails to take/analyze for E-coli after a total coliform positive routine.
- A system fails to submit a monitoring report, assessment report or certification of start- up procedure completion.
- A system fails to notify the State of an E.coli positive sample.

Actions to be taken in the event of a Monitoring/Reporting Violation (A Violation Requiring a Tier 3 Public Notification)

A public water system that has violated the Monitoring and or Reporting requirements must;

•	Report the violation to the State no later than the end of the next business day after
	system learns of the violation.
	Person to Contact: Mr. State Inspector at the Local Environmental Field Office

• A Tier 3 Public Notice must be provided to customers:

Tier 3 notices must be issued within 360 days of learning of the violation.

- Refer to the EPA Public Notification Handbook for specific content and delivery requirements. Examples are contained in the next two pages
- Notify the public using this procedure:

Telephone:

- Furnish a copy of the notice to the customers served by the public water system via mail, postings or other direct delivery as soon as possible, but no later than 365 days after the violation;
- o The notice must contain the following language:
 - The notice must contain the language shown in the example notices on the next pages;

or 1-888-891-8332

The system may want to describe what is being done to correct the problem:

Example Tier 3 PN for Failure to Take All Routine Total Coliform Samples in the Required Compliance Period

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER Monitoring Requirements Not Met for System D

We are required to monitor your drinking water for specific contaminants on a regular basis. Results of regular monitoring are an indicator of whether or not your drinking water meets health standards. During December 2016, we did not complete all monitoring or testing for total coliform, and therefore, cannot be sure of the quality of your drinking water during that time.

On January 11, 2017, we became aware that our water system failed to collect all of the required monthly routine total coliform distribution system samples in December 2016. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we did to correct the situation. None of the 12 samples that we did collect was positive for total coliform or *E. coli* bacteria.

What should I do?

There is nothing you need to do. You do not need to boil your water or take other corrective actions. You may continue to drink the water. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours. We will also announce any emergencies on Channel 22 and Radio Station KMMM (97.3 FM).

What was done?

We collected all 15 of the required routine total coliform samples in January and tested them for *E. coli*. None of the samples collected in January was positive for *E. coli*.

For more information, please contact John Johnson, manager of System D, at (555) 555-1234 or write to 2600 Winding Rd., Townsville, TM 12345.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by System D. State Water System ID# TM1234585. Sent: 1/10/2018

Example Tier 3 PN for Failure to Notify the State Following an EC+ Sample Result

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER **Reporting Requirements Not Met for System F**

Our system failed to notify the state of an E. coli-positive (EC+) routine sample by the end of the day that we learned of the violation. The water system has not exceeded the E. coli MCL standard set by the Revised Total Coliform Rule. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we did to correct the situation.

What should I do?

There is nothing you need to do. You do not need to boil your water or take other corrective actions. You may continue to drink the water. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours. We will also announce any emergencies on Channel 22 and Radio Station KMMM (97.3 FM).

What was done?

We notified the state of the routine monitoring sample that was EC+.

For more information, please contact John Johnson, manager of System F, at (555) 555-1234 or write to 2600 Winding Rd., Townsville, TM 12345.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by System F. State Water System ID# TN1234585. Sent: 3/11/2017

CN-1474



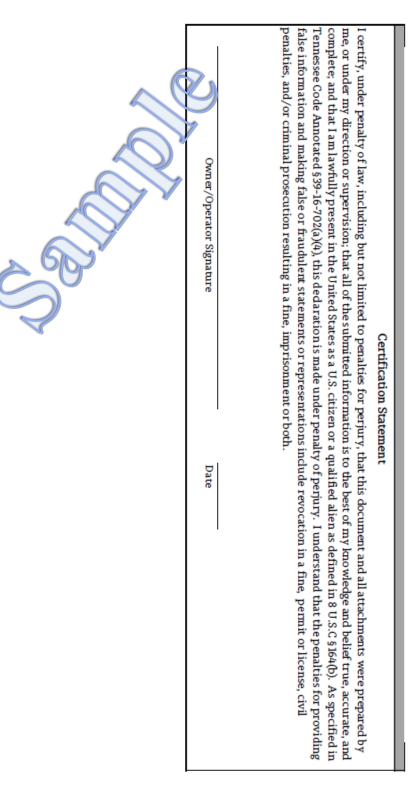
TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION DIVISION OF WATER RESOURCES - DRINKING WATER UNIT

William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Ave., 11th Floor Nashville, TN 37243-1102

SEASONAL NON-COMMUNITY PUBLIC WATER SYSTEMS

			COMMENTS:
N/A	NO	YES N	ends of distribution system
			(f.) Unless otherwise approved by the Division, system must ensure measureable disinfectant residual of 0.2 ppm at all distal
N/A	NON	YES N	(e.) The chemical injection point has been cleaned and chemical feed pump is working properly
N/A	NO	YES N	(d.) Chlorinator inspected and declared to be operating properly
N/A	NO	YES N	(c.) The chlorine residual test kit is working, reagents are not expired and is properly calibrated at the beginning of the season.
N/A	NO N	YES N	(b.) Chlorine is pumping at an adequate dose throughout listribution system including distal ends
N/A	NO	YES N	
			(2.) Chlorination and Other Treatment (softening, filters phosp late, etc.)
L			COMMENTS:
N/A	NON	YES N	ords are maintained
N/A	NO N	YES N	(h.) Sample tap does not leak and flows freely when spep.
N/A	NON	YES N	(g.) Rodents and insects are kept out of the pump house and away from the well (keep area mowed)
N/A	NO	YES N	(f.) Well vent is turned downward and the screen is intact
N/A	NO	YES N	(e) Well cap is tight with no openings that would allow insect infiltration
N/A	NO	YES N	
N/A	NO Z	YES N	(c.) Chemicals (i.e. gas, solven), pesticides ale stored outside isolation radius or at least more than 100 feet from well
N/A	NO	YES N	(b.) Well casing is structurally sound
N/A	NO N	YES N	l completely secure)
L			(1.) Well Source and Pump Kouse Start-up Shut-down
			offices.shtml
		eld-	Environmental Field Office for your area copy and paste the link below into your browser: http://www.tn.gov/environment/field-
	he	cate t	below and submit this form to the regional Environmental Field Office prior to serving water to the public for the season. To locate the
	SQ	theste	Under the Revised Total Coliform Rule (RTCR), systems that are only opened part of the year or seasonal are required to follow the steps
			State Approved Start-up Checklist for PWSID # and Name

			- - - -				
_			<u>ම</u> ල	0		୍ତିଲିକ୍	(3.)
*** Note: Remember to update your Wellhead Protection Plan If you have any questions, contact your local Environmental Field Office at (888) 891-TDEC (8332)	(7.) Additional Comments:	Flush distribution lines and check chlorine residual 3/2 lantions on 2 separate days Flush distribution lines and check chlorine residual 3/2 lantions on 2 separate days YES NO N/A Ensure RV dump station maintains air gap	Distribution Lines Lines walked to ensure none are exposed—leaking to a leaking the located and are exposed—leaking to a leaking to a	Pressure tanks ther oughly flushed COMMENTS: YES NO N/A COMMENTS:	pressure is being maintained and tank is not waterlogged YES NO Properly operating YES NO	(4.) Storage Tanks (a.) Flush the interior of the tank (b.) The tank overflow pipe is screened and air gap is maintained above ground (c.) Tank has been visually in spected for damage or repairs COMMENTS: YES NO N/A YES NO N/A	Monitoring and Reporting All required total coliform bacteria samples were collected prior to serving water to the public with a negative result YES NO N/A COMMENTS:



Appendix B - Level 1 ASSESSMENT FORM



TENNESSEE DEPARTMENT OF ENVIRONMENT & CONSERVATION DIVISION OF WATER RESOURCES – DRINKING WATER UNIT

William R. Snodgrass Tennessee Tower 312 Rosa L. Parks Ave., 11th Floor Nashville, TN 37243-1102 615-532-0191

REVISED TOTAL COLIFORM RULE LEVEL 1 ASSESSMENT

Water System Name:	
PWSID #:	
Assessment	
Performed By:	
Date of Assessment:	
	(1.) Sampling
□Yes □No If Yes, explain	(a.) Review total coliform sample results and chlorine residuals for the past three months (six months, if sampling quarenty). Are there any trends in bacteria samples or chlorine residuals?
	(b.) Sampling Guidance
	 The vater should be allowed to run for a few minutes to ensure it was from the dis(fibition system and not household plumbing. The faute; should be disinfected. The chlorine residual should be taken but not using the bacteria sample bottle. Care should be taken not to touch the inside of the bottle or lid, not to set the lid do in and not rinse the bottle out. Container should not touch faucet. The water should be flowing in a slow, steady stream. Container should not be overfilled and should be sealed immediately. Outdoor faucets, frost-proof faucets should be avoided. If possible, avoid faucet connected to water heater, pressure tank; hot water faucet, new faucet, swing/swivel faucets, janitor sink faucets or other potentially contaminated faucets.
	(c.) Describe below the sampling technique used for bacteria sampling:
	(d.) Name of Sampler

CN-1475 Page 1 of 8 RDA 2410

□Yes □No If Yes, explain	(e.) Are conditions at the sample tap unsanitary and prone to external contamination?
ii res, explain	Contamination:
□Yes □No	(f.) Has the sample site been in regular use? Would the typical use of the tap be
Explain setting/use of tap	prone to contamination (food preparation, utility sink, etc.)?
· · · p	
	(g.) Describe how the samples were provested:
	I. Samples shipped or delivered?
	II. Time between sample follection and delivery to lab?
	11. Thie between sample whethou and derivery to lab?
	III. Samples cooled or ambient temperature?
	IV. Fresh sample bottles?
	V. Properly stored sample bottles?
	(h.) If the system has a certified bacteriological lab, review their lab procedures, QA/QC and the cleanliness of the lab. Provide observations below:
	(2.) General – File Review
	(a.) Review last sanitary survey and survey letter for identified problems affecting water quality, particularly repeat issues. Provide observations below:
	(b.) Review Monthly Operating Reports (MORs) for past 6 months paying special attention to chlorine residual leaving plant and turbidity levels.

Page 2 of 8 CN-1475 RDA 2410

	Provide observations below:
	(s) Povious files for filter exceedance reports filter performance reports identify
	(c.) Review files for filter exceedance reports, filter performance reports, identify filter run times.
	Provide observations below:
	Flovide observacions below.
□Yes □No	(d.) Has there been a loss of se vice die to a failure of water transmission or
If Yes, explain	distribution facilities?
•	
□Yes □No	(e.) Could ap operation of maintenance activities have introduced contamination?
If Yes, explain	
□Yes □No	(f.) Assere been recent delivery of new treatment chemicals? Were they
If Yes, explain	confirmed to be the correct chemical and strength?
□Yes □No	(a) Heathers have remained assess to facilities identified?
If Yes, explain	(g.) Has there been vandalism or unauthorized access to facilities identified?
ii res, explain	
	(3.) Distribution System
□Yes □No	(a.) Have all issues identified in the last professional tank inspection and sanitary
	survey been addressed? Describe below:
□Yes □No	(h) Have there been line replacements water line breaks or repairs or a
□ 162 □ IVO	(b.) Have there been line replacements, water line breaks or repairs or new construction within the past 3 months? Describe disinfection techniques
	employed below:
	cinployed below.

Page 3 of 8 CN-1475 RDA 2410

□Yes □No	(c.) If the tank or clearwell inspection or repair was within the past 3 months, was proper disinfection employed afterward? When were the tanks last cleaned out?
	Describe disinfection technique below:
□Yes □No	(d.) Is there an ongoing flushing program and when was the last flushing performed? Describe below:
□Yes □No If yes, explain	(e.) Are there any areas where it is directly maintain chlorine residual without flushing?
□Yes □No If Yes, explain	(f.) With relicing the direction of the
II Tes, explain	Research the pressure of other low pressure events such as the oreaks:
	(4.) Cross Connections
□Yes □No	(a.) Are backflow prevention devices being tested annually?
□Yes □No	(b.) Are there backflow prevention devices in the vicinity of the total coliform
If Yes, explain	positive site or places that should have backflow prevention devices?
□Yes □No	(c.) Have any failed backflow prevention devices missed being repaired/replaced and
If Yes, explain	retested within the previous 12 months?
,,	
□Yes □No	(d.) Within the area of concern, have there been surveys conducted for the detection
	and elimination of hazards associated with cross-connections? Describe the area (e.g., residential, commercial, sparsely populated rural, etc.) and any known
	backflow prevention devices and potential risks.

CN-147S Page 4 of 8 RDA 2410

	(5.) Plant Operation/Treatment
□Yes □No If No, explain	(a.) Are all of the facilities secure to prevent unauthorized access?
□Yes □No	(b.) Is the treatment facility operated and manned 24 hours a day? Explain below:
	(c.) If unmanned while in operation, what monity rip./shutdown alarms are in place at the treatment facility (turbidity, chlorine residual, etc.) and are they operational? Describe below:
□Yes □No If Yes, explain	(d.) Has there been any unusual filter performance within the past 3 months?
□Yes □No If Yes, explain	(e.) Review turbidity records for the past three months. Have there been any turbidity exceedances of more than 1 NTU in either the individual filters or combined?
	(f.) Have there been any other parameters out of normal range within the past 3
	months? Describe below:
□Yes □No If Yes, explain	(g.) Have there been any disruptions within the past 3 months that could have affected turbidity or disinfection (chlorine feed or UV disinfection)?

CN-1475 Page 5 of 8 RDA 2410

□Yes □No If Yes, explain	(h.) Are there any unsanitary conditions, rodents, birds, general housekeeping problems at any of the facilities?
□Yes □No If Yes, explain	(i.) Were there any observed leaks or other signs of poor maintenance within the facilities? :
□Yes □No	
□Yes □No	(j.) If there is a pressure tank present, is it maintaining appropriate pressure?
□Yes □No	(k.) If the system is using a carrower liter, is the filter the correct absolute 1 micron cartridge and is it changed a corrier, to manufacturer's recommendation? Provide comments be every
	Trovide comments of
□Yes □No	(6.) Chlorine Residual (a.) has the system been achieving the proper contact time, if required (minimum of
Tes and	15 minutes Indicate below if system is not chlorinating and discuss system's contact time below:
□Yes □No	(b.) Is there consistent chlorine residual in the water leaving the plant? Describe below: Indicate below if system is not chlorinating. Describe below:
	(7) IIV Disinfection If applicable
□Yes □No	(7.) UV Disinfection – If applicable (a.) Is the unit operational?
□Yes □No	(b.) Is the turbidity low enough for it to work properly?
□Yes □No	(c.) Does the unit have the proper UV lamp?
□Yes □No	(d.) Does the lamp need replaced?
□Yes □No	(e.) Is the lamp sleeve clean?
	(8.) Source
□Yes □No If Yes, explain	(a.) Have there been any new or auxiliary sources brought online?

CN-1475 Page 6 of 8 RDA 2410

□Yes □No If Yes, explain	If seasonal, were there any problems with the startup procedure?÷
	(0) 11/-11/0
-V V-	(9.) Well/Spring
□Yes □No	(a.) Is springbox in good condition? Describe springbox below:
□Yes □No	(b.) Is springbox/well head protected from surface rater drainage/infiltration? Describe below:
□Yes □No	(c.) Is well casing above grady/head zone? Describe setting below:
220 220	
□Yes □No	(d.) Is the sanitary seal on the well casing is intact?
□Yes □No	(e.) Is well vent screened?
□Yes □No	(f.) Was there any heavy precipitation or flooding within the 30 days prior to the
If Yes, explain	total coliform positive event?
	(10.) Intake
□Yes □No	(a.) Any conditions that might increase turbidity or introduce contamination?
If Yes, explain	(-,,
□Yes □No	(h) to the intelligence consistence to model of a section
	(b.) Is the intake or equipment in need of repair?
If Yes, explain	
□Yes □No	(c.) Was there any heavy precipitation or flooding within the 30 days prior to the

If Yes, explain	total coliform positive event?
□Yes □No If Yes, explain	(d.) Have there been any changes in sources of potential contamination in proximity of the water source?
	(11.) Assessment Statement and Proposed Remedy
	Attach additional sheets if necessary
	Certification Statement
attachments were proto the best of my kno States as a U.S. citizer Section 39-16-702(a)(oproviding false information)	lty of law, including but not limited to penalties for perjury, that this document and all epared by me, or under my direction or supervision; that all of the submitted information is wledge and belief true, accurate, and complete; and that I am lawfully present in the United or a qualified alien as defined in 8 U.S.C. \$1641(b). As specified in Tennessee Code Annotated 4), this declaration is made under penalty of perjury. I understand that the penalties for mation and making false or fraudulent statements or representations include revocation in a e, civil penalties, and/or criminal prosecution resulting in a fine, imprisonment or both.
Signature	Date

CN-1475 Page 8 of 8 RDA 2410