



---

## Regulatory Alert

**TO: All Utilities**

**FROM: AWWA Government Affairs**

**DATE: February 9, 2010**

<p><b>Who: EPA, Office of Ground Water and Drinking Water</b></p> <p><b>What: Review of <i>E. coli</i> Triggers for <i>Cryptosporidium</i> Monitoring</b></p> <p><b>When: February 4, 2010</b></p>
--

The US Environmental Protection Agency (EPA) on Feb. 4 distributed new guidance (<http://www.awwa.org/files/GovtPublicAffairs/PDF/LT2Guidance.pdf>) to states regarding the Long-Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR).

Under the LT2ESWTR, small systems serving fewer than 10,000 people -- also known under as Schedule 4 systems -- have the option of first monitoring for *E.coli* in their source water, and then monitoring for *Cryptosporidium* if the resulting observations exceed specific trigger levels.

The final rule included the following average *E. coli* trigger levels based on source water monitoring:

- 10 *E. coli* /100 ml for lake/reservoir sources, and
- 50 *E. coli* /100 ml for flowing stream sources.

In 2009, EPA analyzed large system monitoring data and is now distributing guidance to states with the following trigger level:

- average *E. coli* level of 100 *E. coli* /100 ml for both lake/reservoir and flowing streams.

EPA is distributing guidance only to states. Individual states will have to determine if it will employ the new trigger criteria. In this respect, the timing of the release of the criteria is important. Schedule 4 systems that exceeded the initial triggers were required to submit sampling plans by Jan. 1, 2010, and sampling must begin no later than April 2010. Therefore, states will have a limited amount of time to make adjustments based on this new guidance. Schedule 4 systems that exceeded the initial LT2ESWTR *E. coli* criteria but do not exceed the

new guidance criteria should contact their state or regional EPA LT2ESWTR coordinator to determine if monitoring will be necessary.