

Drinking Water Compliance Self-Check Checklist

For Community & Non-Transient Non-Community Water Systems (40 CFR Part 141)

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This checklist is a preliminary self-assessment aid. It summarizes federal requirements under 40 CFR Part 141 but does not replace your state's primacy-agency rules, which may be stricter. Always confirm monitoring schedules and requirements with your primacy agency. LCRI and PFAS notes reflect status as of the verification date — check for updates.

1. System Information & Classification

- ☐ System type confirmed: ☐ Community (CWS) ☐ Non-transient non-community (NTNCWS) ☐ Transient non-community (TNCWS) — 141.2
- ☐ Population served and number of service connections documented and current
- ☐ Source type(s) documented: ☐ Ground water ☐ Surface water / GWUDI
- ☐ Primacy agency contact and current state monitoring schedule on file

2. Sampling Plans & Siting Plans

- ☐ RTCR coliform sample siting plan written, representative of the distribution system, available for review — 141.853(a)
- ☐ Siting plan reviewed after any system change (new sources, storage, pressure zones)
- ☐ Lead & copper tap sampling plan: Tier 1 sites prioritized, documented — 141.86(a)
- ☐ Stage 2 DBPR monitoring plan (IDSE-based locations) on file and followed — 141.622
- ☐ All sampling locations accessible, with backup/alternate sites identified

3. Revised Total Coliform Rule (RTCR) — Microbials

- ☐ Routine total coliform samples collected at the required frequency for system size — 141.854-141.857
- ☐ Repeat samples collected within 24 hours of a TC-positive routine (3 repeats minimum; one at tap, others within 5 connections) — 141.858
- ☐ Every TC-positive repeat also analyzed for E. coli — 141.858
- ☐ Level 1 assessment triggered and completed within 30 days when required (e.g., ≥ 2 TC+ in a month for small systems) — 141.859
- ☐ Level 2 assessment triggered and completed within 30 days when required (E. coli MCL violation or repeated L1 triggers) — 141.859

- ☐ Assessments performed by a qualified party as defined by the state; corrective actions completed on schedule
- ☐ No E. coli MCL violation in the past 12 months (E. coli MCL = zero positive; violation conditions — 141.860)
- ☐ Seasonal systems: start-up procedures completed and certified before serving water — 141.854(i), 141.857(d)

4. Lead & Copper — LCR and LCR Improvements (LCRI)

- ☐ Tap monitoring conducted in the correct monitoring period at the required number of sites — 141.86–141.87
- ☐ 90th-percentile lead and copper calculated correctly (≤ 5 samples: see state worksheet; 6+: rank at $n \times 0.9$) — 141.80
- ☐ Lead action level 0.015 mg/L not exceeded (note: drops to 0.010 mg/L under LCRI general compliance date Nov 1, 2027)
- ☐ Copper action level 1.3 mg/L not exceeded — 141.80(c)
- ☐ If action level exceeded: public education delivered within 60 days; corrosion control / source water treatment steps evaluated — 141.81–141.85
- ☐ Service line inventory submitted (federal deadline was Oct 16, 2024); inventory kept current — LCRI 141.84(a)
- ☐ Service line replacement plan prepared (LCRI); unknown lines investigated per state schedule
- ☐ Lead service line notifications to consumers with lead/galvanized/unknown lines sent annually where required

5. Disinfection Byproducts — Stage 1 & Stage 2 DBPR

- ☐ TTHM and HAA5 monitored at Stage 2 locations on the required schedule — 141.620–141.629
- ☐ Locational Running Annual Average (LRAA) ≤ 0.080 mg/L TTHM and ≤ 0.060 mg/L HAA5 at every location — 141.64(b)
- ☐ Bromate ≤ 0.010 mg/L (if ozonated) and chlorite ≤ 1.0 mg/L (if chlorine dioxide used) — 141.64(b)
- ☐ Operational evaluation triggered when $(Q1+Q2+Q3+Q4)/4$ approaches the MCL at any location; report submitted — 141.626
- ☐ Increased monitoring or corrective actions taken after any LRAA exceedance

6. Disinfectants & Residuals

- ☐ Chlorine MRDL 4.0 mg/L (as Cl_2) and chloramine MRDL 4.0 mg/L (as Cl_2) not exceeded (running annual average) — 141.65
- ☐ Chlorine dioxide MRDL 0.8 mg/L not exceeded; daily monitoring at entry point when used — 141.65, 141.132(c)
- ☐ Distribution system residual monitored alongside coliform samples (and heterotrophic plate count alternative where allowed) — 141.853

- ☐ Nitrification action plan in place for chloraminated systems (monitoring plan, response actions) — state/EPA guidance
- ☐ Monthly disinfectant residual averages reported to the state — 141.134

7. Surface Water Treatment Rules (SWTR / IESWTR / LT1 / LT2)

- ☐ Filtered systems: 3-log Giardia / 4-log virus removal-inactivation achieved through filtration + disinfection — 141.73-141.74
- ☐ Combined filter effluent turbidity ≤ 0.3 NTU in $\geq 95\%$ of monthly measurements; never > 1 NTU — 141.73(a)
- ☐ Individual filter effluent monitored continuously (or per state-approved alternative) — 141.74
- ☐ Disinfection CT calculated daily and $\geq$ required for 3-log Giardia / 4-log virus — 141.74(b)
- ☐ Disinfectant residual entering distribution ≥ 0.2 mg/L and detectable in $\geq 95\%$ of distribution samples — 141.72(a)
- ☐ LT2: source water Cryptosporidium monitoring completed; bin classification current; additional treatment in place if Bin 2+ — 141.701-141.722
- ☐ Unfiltered systems (if any): watershed control, disinfection, and all 141.71-141.72 criteria still met

8. Inorganic Chemicals (IOCs)

- ☐ Nitrate (MCL 10 mg/L as N) and nitrite (MCL 1 mg/L as N) monitored at entry points on schedule — 141.62, 141.23(d)
- ☐ Nitrate/nitrite results $> 50\%$ of MCL trigger increased quarterly monitoring — 141.23(d)(4)
- ☐ Arsenic (0.010 mg/L), fluoride (4.0 mg/L), and other IOCs monitored per state schedule — 141.62, 141.23
- ☐ Asbestos (7 MFL, if vulnerable), mercury, selenium, etc. covered where the state requires
- ☐ Any new source or entry point sampled for IOCs before/in service — state requirements

9. Volatile & Synthetic Organic Chemicals (VOCs/SOCs)

- ☐ VOCs (benzene, TCE, PCE, etc.) monitored on the state-issued schedule; waivers current if granted — 141.24(f)
- ☐ SOC (atrazine, simazine, glyphosate, etc.) monitored on schedule; waivers current if granted — 141.24(h)
- ☐ Any detection $> \text{MCL}$ followed by confirmation, increased monitoring, and public notification as required
- ☐ Waiver applications renewed before expiration; vulnerability assessments current

10. Radionuclides

- ☐ Gross alpha (MCL 15 pCi/L), combined radium-226/228 (5 pCi/L), uranium (30 $\mu\text{g/L}$) monitored per schedule — 141.66, 141.26
- ☐ Beta/photon emitters (4 mrem/yr) addressed where designated vulnerable — 141.66(d)

- ☐ Reduced monitoring eligibility verified (results consistently < detection limits)

11. PFAS — 2024 NPDWS (check for updates)

- ☐ System aware of the six regulated PFAS and MCLs: PFOA 4.0 ppt, PFOS 4.0 ppt, PFHxS 10 ppt, PFNA 10 ppt, HFPO-DA (GenX) 10 ppt, and mixtures HI = 1.0 (unitless) — 141.61(c)
- ☐ Initial monitoring plan in place (federal rule: complete initial monitoring by 2027)
- ☐ MCL compliance timeline tracked (federal rule: comply beginning 2027; running annual average)
- ☐ Status check (Sep 2026): EPA proposed revisions in 2026 (including rescinding some MCLs / extending dates) were still proposed/pending — confirm current federal AND state requirements before planning treatment
- ☐ Public notification language for any PFAS MCL violation prepared

12. Ground Water Rule (GWR)

- ☐ Triggered source-water monitoring conducted after any TC-positive distribution sample in systems without 4-log treatment — 141.402
- ☐ Assessment monitoring performed if required by the state after deficiencies — 141.402(i)
- ☐ Significant deficiencies from sanitary surveys corrected within 120 days (or per state-approved schedule) — 141.404
- ☐ Fecal-indicator-positive source samples followed by public notification and corrective action — 141.403

13. Public Notification & Consumer Confidence Report

- ☐ Tier 1 notice issued within 24 hours for acute violations (E. coli MCL, nitrate MCL, etc.) — 141.202
- ☐ Tier 2 notice within 30 days for non-acute MCL/treatment-technique violations — 141.203
- ☐ Tier 3 notice within 1 year (in the CCR) for monitoring/reporting violations — 141.204
- ☐ Consumer Confidence Report delivered by July 1 each year (CWS); content meets 141.153-141.154
- ☐ Notices delivered by the required methods (mail, posting, broadcast) with proof of delivery kept

14. Recordkeeping & Reporting

- ☐ Microbiological and turbidity records kept $\geq$ 5 years — 141.33(a)
- ☐ Chemical sampling records kept $\geq$ 10 years — 141.33(b)
- ☐ Sanitary surveys, variances/exemptions, and corrective actions kept $\geq$ 10 years — 141.33
- ☐ Monthly operating reports submitted to the state on time (residuals, turbidity, CT) — 141.31(d), 141.75
- ☐ Violation and enforcement correspondence filed and retrievable

15. Operator Certification & Capacity

- ☐ Appropriately certified operator(s) in responsible charge per state requirements
- ☐ Cross-connection control / backflow prevention program active — state requirements
- ☐ Emergency response plan current; staff know Tier 1 notification procedures
- ☐ Last sanitary survey date: _____ ; deficiencies corrected: ☐ Yes ☐ In progress

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