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February 12, 2010

Rod Bigham, Manager  
Jefferson RWD 15  
Route 1, Box 402  
Meriden, Kansas 66512

Re: 2009 Monitoring Violations under the Total Coliform Rule (TRC)

Dear Rod,

I appreciate the opportunity to visit with you on February 1 to discuss several issues regarding collection of the district's bacteriological water samples. KDHE has requested that KRWA staff contact several water systems across the state that are not routinely submitting all bacteriological water samples each month. Jefferson RWD 15 was one of the systems cited by KDHE.

One of the most important tools an operator can use to ensure coliform-free drinking water is to routinely collect and submit all bacteriological water samples to the KDHE laboratory for analysis. Monitoring for coliform bacteria along with daily monitoring of chlorine residuals helps public water systems demonstrate their water is safe to drink. However, the district had three violations of the Total Coliform Rule (TCR) during 2009:

1. A routine sample collected on February 18, 2009 was positive for coliform bacteria. However, the three repeat (check) samples were not collected within 24-hours of learning of the positive result. The three repeat samples were not collected until April 8, 2009. Consequently, a monitoring violation occurred for which the district was required to notify your customers. Once the public notice is delivered to your customers, the district must also provide KDHE with a copy of the notice within 10 days. **To date, KDHE has not received a copy of the notice that was required for failure to collect the three repeat samples in a timely manner. The district needs to send both a copy of the actual notice and a Certificate of Delivery indicating when and how the notices were delivered to your customers. Both documents should be sent to Jean Herrold, KDHE Bureau of Water, Public Water Supply Section, 1000 SW Jackson, Suite 420, Topeka, KS 66612.**
2. During March 2009, the district submitted only one routine sample to the KDHE laboratory. The district is required to submit two routine samples every month. Otherwise, a monitoring violation automatically occurs. Public notification was required. KDHE received a copy of the actual public notice and Certificate of Delivery for this monitoring violation.

3. In July 2009 the district experienced a maximum contaminant level (MCL) violation, as one of your routine samples was coliform-positive in addition to one of the repeat (check) samples. An MCL violation occurs whenever you experience two coliform-positive routine samples in a given month or a positive routine sample followed by a positive repeat (check) sample. Public notification was required and KDHE confirms they have received a copy of the actual public notice and Certificate of Delivery for this MCL violation.

Jefferson RWD 15 will also be required to include copies of each of the 2009 public notices for TCR violations in your 2010 Consumer Confidence Report (CCR). Your CCR must be delivered to all customers by no later than July 1, 2010.

I urge the district to be more conscientious in submitting all water samples in a timely manner. The district needs to make major improvements in how samples are submitted to KDHE. First, both routine samples must be submitted every month. I suggest developing a tracking system to make sure all samples are sent. Even using something as simple as a calendar should help. Second, all repeat (check) samples must be submitted in a more timely manner (i.e., within 24-hours of learning of the positive routine sample). Check the collection date on the outside of the boxes for repeat samples and make sure all are collected on that date.

I also suggest investigating why so many samples collected at the Dorothy Gantz residence are coliform-positive. Samples collected on July 21, August 4 and August 11, 2009 were all positive for coliform. Possible sources of contamination include a cross-connection or use of a water softener. It is very important this situation be investigated as it is very rare to experience that many positive samples within such a short time period. I also suggest reviewing how samples are collected to ensure none are accidentally contaminated during collection. If you want assistance investigating, let me know.

If I can be of further assistance, please feel free to reach me by phone at 913-850-8822 or email at [jeff@krwa.net](mailto:jeff@krwa.net). Funding for the above assistance was provided through a contractual arrangement between the Kansas Department of Health and Environment (State Revolving Loan Program set-aside) and the Kansas Rural Water Association (KRWA).

Sincerely,

Jeff Lamfers  
Consultant

c: Jerry Franz, Chairman  
Linda Bigham, Bookkeeper  
Cathy Tucker-Vogel, KDHE-Topeka  
Jean Herrold, KDHE-Topeka  
Helen Holm, KDHE-Lawrence