

**Disinfection Requirements Rule (DRR) Reporting Instructions: *What’s New for Bottled, Vended, Retail and Bulk (BVRB) Water Systems?***

Beginning with the **July 2018** compliance period:

- Note new **Contaminant IDs** and **Method Codes** in the **Table below**.
- Systems that use water from another permitted water system that provides filtration of Surface Water or Ground Water Under Direct Influence of Surface Water (SW/GUDI) (including vended Permit-by-Rule systems) should use an SDWA-1 form to report:
  - Heterotrophic Plate Count (HPC) at the same time total coliform sample is analyzed, *if no residual is measured or the measured residual is less than:*
    - 0.20 mg/L for free chlorine, combined chlorine, total chlorine, chlorine dioxide, or
    - 0.1 mg/L for ozone
- Treatment technique compliance with the Surface Water Treatment Rule is based on meeting and reporting the minimum disinfectant residual requirement listed above or HPC count result of less than 500 colonies per mL.
- Bottled water systems and retail water facilities using ozone as a final disinfectant *are still required* to maintain an ozone residual of 0.1 to 0.4 ppm in the bottle immediately after filling.
- For bottled water systems that measure a disinfectant residual at the time of filling and then ship the bottle to the laboratory for microbiological analysis, note:
  - Sample and analysis date for residual disinfectant should be the date the sample was collected and analyzed at time of fill.
  - Sample date for microbiological parameters should correspond to the date the bottle was opened by the lab.

**Table. Analysis Methods**

Contam ID	EPA Method	Method Code	Contam ID	EPA Method	Method Code
<b>1013</b> Free Cl	DPD Colorimetric: SM 4500-Cl G, Hach Method 10260	301	<b>1000</b> Total Cl	DPD Colorimetric: SM 4500-Cl G, Hach Method 10260	301
	Indophenol Colorimetric: Hach Method 10241	597		Amperometric Titration: SM 4500-Cl D, ASTM 1253-08, -- 14	587
	Amperometric Titration: SM 4500-Cl D, ASTM 1253-08, -- 14	587		DPD Ferrous Titrimetric: SM 4500-Cl F	588
	DPD Ferrous Titrimetric: SM 4500-Cl F	588		Low Level Amperometric Titration: SM 4500-Cl E	591
	Amperometric Sensor: ChloroSense	596		Iodometric Electrode: SM 4500-Cl I	592
	Syringaldazine (FACTS): SM 4500-Cl H	590		Amperometric Sensor: ChloroSense	596
<b>1001</b> Combined Cl	Amperometric Titration: SM 4500-Cl D, ASTM 1253-08, -- 14	587	<b>3001</b> HPC	Pour Plate	315
<b>1014</b> Ozone	4500 O <sub>3</sub> B Indigo Method	595		Simplate	316

**Example 1:** A vended water system obtains water from a local municipal drinking water system with a surface water source. The vended system is permitted to remove chlorine via carbon filtration and disinfect with ultraviolet radiation. This water system collects one routine total coliform sample during June and chooses to measure a total chlorine residual at the same time. The total chlorine residual result is 0.02 mg/L, so the sampler also collects an HPC sample and sends it to the lab for analysis along with the total coliform sample. *If the vended system chooses not to measure a disinfectant residual, only Total Coliform and HPC would need to be reported.*

SDWA 1 - BACTERIOLOGICAL / RESIDUAL DISINFECTANT / TURBIDITY / DBP ANALYSIS

SDWA-1

PWSID	PWS Name	Contam ID	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type	Sample Time	Lab ID	Sample ID
1234567	Not Found.	1000	301	0.02	060118	101		060118	E	1030	11111	
1234567	Not Found.	3100	331	0	060118	101		060118	E	1030	22222	
1234567	Not Found.	3001	315	115	060118	101		060118	E	1030	22222	

**Example 2:** A bulk water hauler obtains treated water from a local municipal drinking water system with a surface water source. The hauler collects and analyzes the free chlorine residual at delivery and measures a level of 0.19 mg/L, so when the hauler collects a routine total coliform sample, the hauler also collects an HPC sample and sends it to the lab for analysis.

SDWA 1 - BACTERIOLOGICAL / RESIDUAL DISINFECTANT / TURBIDITY / DBP ANALYSIS

SDWA-1

PWSID	PWS Name	Contam ID	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type	Sample Time	Lab ID	Sample ID
1234567	Not Found.	1013	301	0.19	060918	101		060918	E	1030	11111	
1234567	Not Found.	3100	331	0	061018	101		060918	E	1030	22222	
1234567	Not Found.	3001	315	154	061018	101		060918	E	1030	22222	

**Example 3:** A retail water system obtains water from a local municipal drinking water system with a surface water source. The system disinfects with ozone. A routine sample is collected and analyzed for ozone residual and the level detected is 0.1 mg/L, so when the retailer collects a routine total coliform sample, the retailer does not collect an HPC sample.

SDWA 1 - BACTERIOLOGICAL / RESIDUAL DISINFECTANT / TURBIDITY / DBP ANALYSIS

SDWA-1

PWSID	PWS Name	Contam ID	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type	Sample Time	Lab ID
1234567	Not Found.	1014	595	0.1	060718	101		060718	E	1100	11111
1234567	Not Found.	3100	331	0	060818 x	101		060718	E	1100	22222

**Example 4:** A bottled water system obtains water from a local municipal drinking water system with a surface water source. The bottled system disinfects with ozone. A routine sample is collected and analyzed for ozone residual during the fill process, and the level detected is 0.04 mg/L. The bottler ships a finished product bottle to the lab for total coliform analysis and requests that the lab also analyze HPC. *Note: This system would be out of compliance with 109.1009(f)(1).*

SDWA 1 - BACTERIOLOGICAL / RESIDUAL DISINFECTANT / TURBIDITY / DBP ANALYSIS

SDWA-1

PWSID	PWS Name	Contam ID	Analysis Method	Result	Analysis Date	Location ID 1	Location ID 2	Sample Date	Sample Type	Sample Time	Lab ID
1234567	Not Found.	1014	595	0.04	060518	101		060418	E	1110	11111
1234567	Not Found.	3100	331	0	060818	101		060718	E	0900	22222
1234567	Not Found.	3001	315	75	060818	101		060718	E	0900	22222

**Example 5.** A bottled or retail water system obtains water from a local municipal drinking water system with a surface water source. The system disinfects with ultraviolet radiation. No disinfectant residual is measured, so when the bottler or retailer submits a routine sample for total coliform analysis, the bottler or retailer should also request HPC analysis.

SDWA 1 - BACTERIOLOGICAL / RESIDUAL DISINFECTANT / TURBIDITY / DBP ANALYSIS

SDWA-1

1234567	Not Found.	3100	331	0	060818	101		060718	E	0900	22222
1234567	Not Found.	3001	315	75	060818	101		060718	E	0900	22222