




State Water Resources Control Board  
Division of Drinking Water

**TO:** Office of Administrative Law  
300 Capitol Mall, Suite 1250  
Sacramento, CA 95814

**FROM:** Melissa Hall, P.E.   
Senior Water Resource Control Engineer  
**DIVISION OF DRINKING WATER**

**DATE:** 3 March 2021

**SUBJECT:** REQUEST FOR EARLY EFFECTIVE DATE FOR THE REVISED TOTAL COLIFORM RULE REGULATIONS

The State Water Resources Control Board (State Water Board) requests an early effective date for the Revised Total Coliform Rule adopted on 2 February 2021. Specifically, as noted on the Standard Form 400, the State Water Board requests that the Office of Administrative Law (OAL) make these regulations effective on 1 May 2021, or the first day of the first month following OAL approval, whichever is earliest.

The State Water Board requests an early effective date for these regulations pursuant to Administrative Procedure Act, section 11343.4(b). That section allows OAL to prescribe an earlier effective date based on consideration of a written request demonstrating "good cause". The primary purpose of this request is to provide relief for California's approximately 7,500 public water systems from the burden of tracking and reporting compliance with both California's existing Total Coliform Rule regulations and federal Revised Total Coliform Rule regulations—two different sets of regulations with similar purposes.

The federal Revisions to the Total Coliform Rule took effect in April 2016. Since then, California public water systems have been working to comply with the federal regulations, subject to federal enforcement, as well as with California's existing Total Coliform Rule. Once California's Revised Total Coliform Rule regulations take effect, California public water systems will be able to return to complying with a single set of regulations.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR