



GUAM ENVIRONMENTAL PROTECTION AGENCY • AHENSIAN PRUTEKSIÓN LINA'LA' GUÅHAN  
LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM  
MICHELLE C. R. LASTIMOZA • ADMINISTRATOR

Date: DEC 12 2024

Mr. Allan Fontanilla  
Executive Vice President  
Guam Regional Medical City  
P.O. BOX 333 ROUTE 3  
Dededo. Guam 96929

RECEIVED BY  
R. Arellano  
GRMC. 12-13-24

Re: Notice of Violation (NOV) of the Guam EPA Safe Drinking Water Regulations  
Failure to <sup>corrected 12/18/2024 JDM</sup> Monitor and Report for Revised Total Coliform Rule (RTCR)  
Guam Regional Medical City Water System PWS ID#: GU0000019

*Hafa Adai* Mr. Fontanilla:

Pursuant to 10 Guam Code Annotated (GCA) Chapter 53, known as the Safe Drinking Water Act (SDWA), Guam Environmental Protection Agency is authorized to perform any and all acts necessary to fulfill the functions and requirements of the Act in order to promulgate and enforce the Guam Primary and Secondary Drinking Water Regulations covered under 22GAC, Guam EPA Division II. Water Control, Drinking Water Chapter 6 that shall apply to each public water systems in Guam including those owned and operated by the Government of Guam and Federal Agencies.

## I. BACKGROUND

Guam Environmental Protection Agency (GEPA) did ~~not~~ receive Coliform Monitoring results for your water system for the monitoring month of November 2024, <sup>on December 11, 2024. Added 12/18/2024 JDM</sup> which are required monthly. Results for each month must be submitted to GEPA by the 10th day of the following month. Accordingly, GEPA determined that you are in violation with the provision of the Guam Safe Drinking Water Regulations (GSDWR) as follows:

## II. VIOLATION: Failure to Report for Total Coliform Bacteria

All public water systems are required to perform monitoring for total coliform bacteria. GSDWR requires that Public Water Systems (PWS) must collect total coliform samples at sites which representative of water throughout the distribution system according to a written sample siting plan pursuant to GSDWR §6141.21(a) (referring to 40 CFR § 141.21(a)) and to provide Public



GUAM EPA | 17-3304 Mariner Avenue Tiyan Barrigada, Guam 96913-1617 | Tel: (671) 300.4751/2 | Fax: (671) 300.4531 | epa.guam.gov  
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Guam Regional Medical City Water System  
Failure to Report - RTCR

Notification as specified in GSDWR §6141.201 (referring to 40 CFR § 141.201). In addition, GSDWR requires that PWS, shall report to the State the results of any test measurement or analysis within the first ten (10) days following the month in which result is received pursuant to GSDWR §6141.31(a) (referring to 40 CFR § 141.31).

According to our records, Guam Regional Medical City Water System failed to submit the total coliform sample results for November 2024 by the tenth (10th) of the following month.

### III. COMPLIANCE ORDER

Guam Regional Medical City Water System must comply with the Guam Safe Drinking Water Act (GSDWA) and Guam Safe Drinking Water Regulations (GSDWR) and take the following actions within the specified timeframe:

- a. Report to GEPA the total coliform routine sample(s) for November 2024 as soon as the report is available and ensure the water system's coliform routine sample report must be submitted for the month by the 10th of the following month pursuant to GSDWR §6141.31(a).
- b. Notify the affected customers of the violation pursuant to GSDWR §6141.201 and §6141.204, not later than one year after the you learn of the violation. (See attached Tier 3 Notice Instructions and Template).
- c. Submit a copy of the notice to GEPA no later than 24 hours after providing the notification required in paragraph (b) above.
- d. Submit to the Guam EPA a certification pursuant to GSDWR §6141.31(a), within 10 days of completing the public notification that Guam Regional Medical City Water System has fully complied with the public notification regulations. The public water system must include with this certification a representative copy of each type of notice distributed, published, posted, and made available to the persons served by the system and to the media.

Failure to comply with Notice of Violation/Compliance Order may subject you to a penalty not to exceed \$32,500 for each of the violation pursuant to GSDWA Chapter 53 of Division 2, Title 10 Guam Code Annotated §53120(a).

Guam EPA Safe Drinking Water Program staff is available to help you develop your public notice or submit your draft notice for our review and approval for conformance with the regulations. If you need assistance, contact Ms. Julie Mendoza from our office at telephone number (671)300-9026.



#### IV. NOTICE OF RIGHT TO APPEAL

Pursuant to the GSDWA at §53120(a)(1), this order is issued for immediate action to protect public health from an imminent and substantial danger, and as such, Guam EPA shall provide an opportunity for a hearing within twenty-four (24) hours after service of this order. After such hearing, the Guam EPA Board of Directors may affirm, modify, or rescind this order as appropriate. If you intend to seek such hearing, you may file a Notice of Intent to Appeal also known as a Notice of Defense with the Guam EPA's Board of Directors, setting forth in such Notice of Intent to Appeal/Notice of Defense, a verified petition outlining the legal and factual bases for such an appeal. A copy of the Notice of Intent to Appeal/Notice of Defense is attached for your convenience.

Unless a written request for a hearing signed by or on behalf of the person, agency or business entity named above in this Notice of Violation/Order of Compliance is hand delivered or mailed to Guam EPA within twenty-four (24) hours after the Notice of Violation/Order of Compliance was personally served on you or mailed to you, Guam EPA may proceed upon the Notice of Violation/Order of Compliance without a hearing. A request for hearing may be made by delivering the enclosed form entitled "Notice of Intent to Appeal also known as a Notice of Defense", or by delivering a notice of defense as provided in 5 GCA §9205, to the following address:

Guam Environmental Protection Agency Board of Directors  
c/o Administrator Guam Environmental Protection Agency  
Building 17-3304 Mariner Avenue  
Tiyan Barrigada, Guam 96913

If you file a Notice of Intent to Appeal/Notice of Defense, the Guam EPA's Board of Directors shall hold a public hearing, at which time you may appear and present evidence in person or through counsel in support of this petition.

Failure to file a Notice of Intent to Appeal and Verified Petition within the period specified above will constitute a waiver of your right to a hearing. If you waive your rights to a hearing the Notice of Violation and Order of Compliance will become final, and Guam EPA may proceed upon the Order without a hearing and without further notice to you.


Please note that the time required to adjudicate any such appeal does not eliminate the timelines established under the GSWDA or GSDWR for providing public notice or taking other required action to mitigate the threat to public health, and failure to provide such notice or take such action may result in additional findings of violation.



Guam Regional Medical City Water System  
Failure to Report - RTRC

If you have any questions regarding this letter, please contact Ms. Juliana Mendoza, Environmental Health Specialist II at [julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov), Ms. Nicole Diras, Environmental Health Specialist I, at [nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov) or our Acting Chief Engineer Johnny Abedania at [johnny.abedania@epa.guam.gov](mailto:johnny.abedania@epa.guam.gov).

*Si Yu'us Ma'ase,*

  
MICHELLE C.R. LASTIMOZA  
Administrator

Cc: Ms. Luis Garcia-Bakarich, USEPA Region 9  
Mr. Everett Pringle, USEPA Region 9 Enforcement and Compliance Assurance Division  
Attorney General Office

Attachments:

Instructions for Tier 3 Public Notice  
Tier 3 Public Notice Template  
Public Notice for Problem Corrected Form  
Public Notice Certification Form  
Notice of Defense





## Instructions for Failure to Report Monitoring Events to the State that are Not Related to *E. coli*-positive Sample Results – Template 3-6

### Template Below

#### Description of Violation or Situation

Failure to notify the state of RTCR events that are not related to *E. coli*-positive sample results are reporting violations that require Tier 3 public notification. The reporting violations addressed by this Tier 3 template require similar public notification content and include:

- Failure to provide total coliform-positive or total coliform-negative sample results to the state in a timely manner.
- Failure to notify the state that an RTCR monitoring violation occurred within 10 days of when the violation occurred.
- Failure to notify the state within 24 hours of a Treatment Technique (TT) violation resulting from failure to perform assessments or corrective actions.
- Failure to submit the completed assessment form or monitoring report within 30 days of triggering the assessment.
- Failure to notify the state when each scheduled corrective action is completed based on the state-approved timeframe.

You must provide Tier 3 public notice to persons served within one year after you learn of the violation [\[40 CFR 141.204\(b\)\]](#). Check with your state to make sure you meet all requirements.

CWSs must use all of the following methods to deliver the notice to consumers [\[40 CFR 141.204\(c\)\]](#):

- Mail or hand delivery (public notice delivery may be provided by CCR if the one year requirement is met), and
- Another method as needed to reach consumers not likely to receive a notice from methods noted above and approved in writing by the state. Such methods could include newspapers, e-mail, or delivery to community organizations.

The notice on the reverse is appropriate for insertion in an annual notice or the Consumer Confidence Report (CCR) (CWSs only), as long as public notification content, timing, and delivery requirements are met [\[40 CFR 141.204\(d\)\]](#).

NCWSs must use all of the following methods to deliver the notice to consumers [\[40 CFR 141.204\(c\)\]](#):

- Posting in a conspicuous place throughout the system, or by hand delivery or mail, and
- Another method as needed to reach consumers not likely to receive a notice from methods noted above and approved in writing by the state. Such methods could include newspapers, e-mail, or delivery to community organizations.

If you:

- Post the notice, it must remain posted until the violation is resolved.
- Post the notice and the violation has already been resolved, you must still post the notice for at least seven days [\[40 CFR 141.204\(b\)\]](#).
- Mail, post, or hand deliver, EPA recommends printing your notice on your system's letterhead, if available.
- Modify the notice, you must still include all required public notice elements from [40 CFR 141.205\(a\)](#) and leave the mandatory language unchanged (see below).

Repeat notice(s) are required annually if the violation or situation persists, unless otherwise directed by the state.

#### Mandatory Language

You must also include standard language to encourage the distribution of the public notice to all persons served, where applicable [\[40 CFR 141.205\(d\)\]](#). This language is also presented in this notice in italics with an asterisk on each end.

#### Corrective Actions

In your notice, you must describe corrective actions you took, or are taking [\[40 CFR 141.205\(a\)\(7\)\]](#) including when your water system expects to return to compliance or resolve the violation [\[40 CFR 141.205\(a\)\(8\)\]](#). You can use the following language, if appropriate, or develop your own:

- We have provided the missing reports to the state and have revised our procedures to ensure we comply with reporting requirements in the future. We are no longer in violation.

**After Issuing the Notice**

Make sure to send a copy of each type of notice and a certification that you have met all the public notification requirements to your state within 10 days after the original or any repeat notice(s) [\[40 CFR 141.31\(d\)\]](#).

## Failure to Report Monitoring Events to the State that are Not Related to *E. coli*-positive Sample Results – Template 3-6

### IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

#### Reporting Requirement(s) Not Met for [Water System Name]

We are required to report [describe the information not reported, such as “the results of monitoring of your drinking water for specific contaminants on a regular basis” or “the results of our water system’s assessment by [enter date]]. Results of [enter applicable text, such as “regular monitoring” or “the assessment”, as applicable] are an indicator of whether or not your drinking water meets health standards. During [compliance period], we did not [describe what you did not report, such as “report the results of monitoring or of the assessment] for [contaminant(s)]”].

Our system failed to notify the state drinking water program as required by [enter date]. Although public health was not impacted, as our customers, you have a right to know what happened and what we did to correct the situation.

#### What should I do?

There is nothing you need to do at this time. You do not need to boil your water or take other actions.

#### What is being done?

While we did not notify the state as quickly as we should have, we have [enter your corrective action] on [enter date]. We are no longer in violation.

For more information, please contact [name of contact] at [phone number] or [mailing address].

*\*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.\**

This notice is being sent to you by [water system name]. State Water System ID# \_\_\_\_\_.

Date distributed: \_\_\_\_\_.





### Template on Reverse

It is a good idea to issue a notice when a serious violation or situation has been resolved. Although EPA regulations do not require such notices, your primacy agency may require you to issue one. You should coordinate with your local health department as well. Below are some recommended methods for a "problem corrected" notice. You should use the same delivery methods you used for the original notice.

- Radio
- Television
- Newspaper
- Hand or direct delivery
- Posting in conspicuous locations

You may wish to use additional methods (e.g., delivery of multiple copies to hospitals, clinics, or apartment buildings) if necessary to reach all persons served. If you post or hand deliver, print your notice on your system's letterhead, if available.

The notice on the reverse is very general and can be used for any violation or situation. However, to help restore consumers' confidence in the water system, you should modify the notice to fit your situation. Although the public should have seen your initial notice, there may be additional information you learned after the notice was issued. Therefore, you should describe the violation or situation again and discuss how the problem was solved.

## DRINKING WATER PROBLEM CORRECTED

Customers of [system] were notified on [give date] of a problem with our drinking water and were advised to [describe recommended action]. We are pleased to report that the problem has been corrected and that it is no longer necessary to [describe recommended action]. We apologize for any inconvenience and thank you for your patience.

[Add further details here when appropriate.]

As always, you may contact [contact name] at [phone number] or [mailing address] with any comments or questions.

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.*

This notice is being sent to you by [system]. State Water System ID#: \_\_\_\_\_.

Date distributed: \_\_\_\_\_.

## Public Notice Certification

I \_\_\_\_\_ certify that the public notice(s) that I am submitting here before you have been posted , hand delivered, mailed, published in the newspaper, or submitted to the media (T.V. / Radio station). I also acknowledge that anybody who knowingly and willfully makes false statement, presentation, or certification in any application, records, report plan or other documentation filed or required to be maintained under the Guam Safe Drinking Water Regulations, or by any certification, or order issued under the Guam Safe Drinking Water Regulations, or who falsifies, tampers with or knowingly renders inaccurate information shall be subject to the penalties.

Notice distributed by \_\_\_\_\_ on \_\_\_\_\_.  
(Method of Notification) (Date of Notification)

Public Notice Locations: \_\_\_\_\_.

Public Notice has required Elements;

- ☐ A description of the violation (MCL or FTM, etc...)
- ☐ When the violation or situation occurred (MCL or FTM, etc...)
- ☐ Potential adverse health effects, using the standard mandatory language(MCL)
- ☐ Population at risk (MCL)
- ☐ Whether alternative water supply is needed (MCL or FTM, etc...)
- ☐ Actions consumers should take to reduce their exposure to the contaminant (MCL)
- ☐ What are you doing to correct the violation or situation (MCL or FTM, etc...)
- ☐ When you expect to return to compliance (MCL or FTM, etc...)
- ☐ Name, business address, and phone number for additional information, and (MCL or FTM, etc...)
- ☐ Standard language encouraging distribution to all persons served. (Where applicable)

\_\_\_\_\_  
(Signature of PWS contact)

\_\_\_\_\_  
(PWS contact title)

\_\_\_\_\_  
(PWS Name)

\_\_\_\_\_  
(PWS I.D. Number)





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LOURDES A. LEON GUERRERO • GOVERNOR OF GUAM | JOSHUA F. TENORIO • LIEUTENANT GOVERNOR OF GUAM  
MICHELLE C. R. LASTIMOZA • ACTING ADMINISTRATOR

## NOTICE OF DEFENSE

I, \_\_\_\_\_, have received your Notice of Violations and/or Order of Compliance, dated \_\_\_\_\_, charging me for violations, and I wish to:

(Please check appropriate sections)

☐ A. Request for a hearing and

☐ 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.

☐ 2. Object to the form of accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.

☐ 3. Wish to prepare new matter in my defense.

☐ 4. Admit to the accusation in part.

☐ B. Admit the accusation in whole.

My mailing address is:

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---

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Signature:

---

Date:



**GUAM EPA** | 17-3304 Mariner Avenue Tiyan Barrigada, Guam 96913-1617 | Tel: (671) 300.4751/2 | Fax: (671) 300.4531 | [epa.guam.gov](http://epa.guam.gov)  
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Nicole Diras &lt;nicole.diras@epa.guam.gov&gt;

**RE: GRMC Consecutive PWS Monitoring Report-November 2024**

Arellano, Roger L. &lt;Roger.Arellano@grmc.gu&gt;

To: Julie Mendoza &lt;julie.mendoza@epa.guam.gov&gt;

Cc: Nicole Diras &lt;nicole.diras@epa.guam.gov&gt;, "Lobaton, Bernie" &lt;Bernie.Lobaton@grmc.gu&gt;, Sierra Bettis &lt;sierra.bettis@epa.guam.gov&gt;, Jerry Aquino &lt;jerry.aquino@epa.guam.gov&gt;

Wed, Dec 11, 2024 at 1:46 PM

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of November 2024.

Sorry for the delay, We will instruct our water operator to take the samples early to avoid delay of the WERI results and likewise the delay in submittal of the report.

For your consideration, review and comment/s.

Thank you for the understanding,

Roger Arellano

Guam Regional Medical City

12/11/2024  
ISSUE NOV FOR  
FAILURE TO MONITOR  
AND REPORT. SEE  
EMAILS. REPORT  
SUBMITTED ON 12/11/2024  
JLZ

From: Julie Mendoza &lt;julie.mendoza@epa.guam.gov&gt;

Sent: Friday, November 8, 2024 5:34 AM

To: Arellano, Roger L. &lt;Roger.Arellano@GRMC.gu&gt;

Cc: Nicole Diras &lt;nicole.diras@epa.guam.gov&gt;; Lobaton, Bernie &lt;Bernie.Lobaton@GRMC.gu&gt;; Sierra Bettis &lt;sierra.bettis@epa.guam.gov&gt;; Jerry Aquino &lt;jerry.aquino@epa.guam.gov&gt;

Subject: Re: GRMC Consecutive PWS Monitoring Report-September 2024

**CAUTION:** This email originated from outside the GRMC network. Do not click links or open attachments unless you recognize the sender and know the content is safe. *This warning was created by GRMC Information Security Services.*

Thank you Roger!

Si Yu'us Ma'ase and Thank You!

JULIANA DLR. MENDOZA | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

SDWIS ENTRY 12/11/24  
D

Telephone: 671-300-9026/4751/4752

Guam EPA Website: [epa.guam.gov](http://epa.guam.gov) | email: [julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)

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On Fri, Nov 8, 2024 at 11:53 AM Arellano, Roger L. <[Roger.Arellano@grmc.gu](mailto:Roger.Arellano@grmc.gu)> wrote:

[Quoted text hidden]



**-November-2024-PWS Report.pdf**  
2235K

Roger

**From:** Arellano, Roger L.

**Sent:** Tuesday, April 9, 2024 2:09 PM

**To:** 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Cc:** Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; Sierra Bettis <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; Nicole Diras <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; Jerry Aquino <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** RE: GRMC Consecutive PWS Monitoring Report-March 2024

Julie,

- I. Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of March 2024.
- II. For your review and comment/s

Thank you,

I. Roger Arellano

II. GRMC Facilities Manager

**From:** Julie Mendoza <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Sent:** Friday, March 8, 2024 1:58 PM

**To:** Arellano, Roger L. <[Roger.Arellano@GRMC.gu](mailto:Roger.Arellano@GRMC.gu)>

**Cc:** Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; Sierra Bettis <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; Nicole Diras <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; Jerry Aquino <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** Re: GRMC Consecutive PWS Monitoring Report-January 2024

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Thank you Roger.

Si Yu'us Ma'ase and Thank You!

**JULIANA DLR. MENDOZA** | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

Telephone: 671-300-9026/4751/4752

Guam EPA Website: [epa.guam.gov](http://epa.guam.gov) | email: [julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)

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On Thu, Mar 7, 2024 at 5:56 PM Arellano, Roger L. <[Roger.Arellano@grmc.gu](mailto:Roger.Arellano@grmc.gu)> wrote:

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of February 2024.

For your review and comment/s

Thank you,

Roger Arellano

**From:** Arellano, Roger L.

**Sent:** Friday, February 9, 2024 5:06 PM

**To:** 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Cc:** Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>

**Subject:** RE: GRMC Consecutive PWS Monitoring Report-January 2024

Julie,

- Please find the attached Monitoring Report for PWS 00019 ( GRMC) for the month of January 2024.
- For your review and comments

Thank you,

Roger Arellano

---

**Julie Mendoza** <julie.mendoza@epa.guam.gov>

Wed, Dec 11, 2024 at 9:24 AM

To: "Arellano, Roger L." <Roger.Arellano@grmc.gu>

Cc: Nicole Diras <nicole.diras@epa.guam.gov>, "Lobaton, Bernie" <Bernie.Lobaton@grmc.gu>, Sierra Bettis <sierra.bettis@epa.guam.gov>, Jerry Aquino <jerry.aquino@epa.guam.gov>, Almer Santos <santosalmer@yahoo.com>

Hafa Adai Roger:

Thank you for your email. However, this is in violation of the Guam Safe Drinking Water Regulations. Public Water Systems are required to report to the State the results of any test measurement or analysis within the first ten (10) days following the month in which result is received pursuant to GSDWR §6141.31 (a).

The Notice of Violation is being worked and will be delivered to your office. There are instructions on what needs to be done and we will work with you to bring you back into compliance.

Thank you.

[Quoted text hidden]

[Quoted text hidden]

---

**Almer Santos** <santosalmer@yahoo.com>

Wed, Dec 11, 2024 at 10:22 AM

Reply-To: Almer Santos <santosalmer@yahoo.com>

To: julie.mendoza@epa.guam.gov, "Arellano, Roger L." <Roger.Arellano@grmc.gu>

Cc: Nicole Diras <nicole.diras@epa.guam.gov>, "Lobaton, Bernie" <Bernie.Lobaton@grmc.gu>, Sierra Bettis <sierra.bettis@epa.guam.gov>, Jerry Aquino <jerry.aquino@epa.guam.gov>

Ka Roger,

It was a mistake for my last sampling. I was off island for this month of November and thinking that I took samples already but when I returned for off island. I found out that I have not took sample yet on Nov. 29 which was still holiday and so even lab was not accepting samples on Friday I asked Ms. Mallary to accept the samples and I will pay whatever overtime charges. Thinking I could received results within seven days after sample, I did not request to expedite.

I hope GEPA will consider this explanation. Ms. Mallary promised that I can received results today. There is no intention to violate any GEPA regulation.

Thank you,  
Almer

[Yahoo Mail: Search, Organize, Conquer](#)

[Quoted text hidden]

---

**Arellano, Roger L.** <Roger.Arellano@grmc.gu>

Wed, Dec 11, 2024 at 1:46 PM

To: Julie Mendoza <julie.mendoza@epa.guam.gov>

Cc: Nicole Diras <nicole.diras@epa.guam.gov>, "Lobaton, Bernie" <Bernie.Lobaton@grmc.gu>, Sierra Bettis <sierra.bettis@epa.guam.gov>, Jerry Aquino <jerry.aquino@epa.guam.gov>

Julie,

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Sorry for the delay, We will instruct our water operator to take the samples early to avoid delay of the WERI results and likewise the delay in submittal of the report.

For your consideration, review and comment/s.

Thank you for the understanding,

Roger Arellano

Guam Regional Medical City

**From:** Julie Mendoza <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Sent:** Friday, November 8, 2024 5:34 AM

**To:** Arellano, Roger L. <[Roger.Arellano@GRMC.gu](mailto:Roger.Arellano@GRMC.gu)>

**Cc:** Nicole Diras <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; Sierra Bettis <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; Jerry Aquino <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** Re: GRMC Consecutive PWS Monitoring Report-September 2024

**CAUTION:** This email originated from outside the GRMC network. Do not click links or open attachments unless you recognize the sender and know the content is safe. *This warning was created by GRMC Information Security Services.*

Thank you Roger!

Si Yu'us Ma'ase and Thank You!

**JULIANA DLR. MENDOZA** | Environmental Health Specialist II |

Safe Drinking Water Information System (SDWIS) Administrator

Safe Drinking Water Program | Guam Environmental Protection Agency

3304 Mariner Avenue #17, Barrigada, Guam 96913

Telephone: 671-300-9026/4751/4752

Guam EPA Website: [epa.guam.gov](http://epa.guam.gov) | email: [julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)

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On Fri, Nov 8, 2024 at 11:53 AM Arellano, Roger L. <[Roger.Arellano@grmc.gu](mailto:Roger.Arellano@grmc.gu)> wrote:

[Quoted text hidden]





**-November-2024-PWS Report.pdf**

2235K





Gmail

Nicole Diras &lt;nicole.diras@epa.guam.gov&gt;

**RE: GRMC Consecutive PWS Monitoring Report-November 2024**

4 messages

Arellano, Roger L. &lt;Roger.Arellano@grmc.gu&gt;

Tue, Dec 10, 2024 at 6:24 PM

To: Nicole Diras &lt;nicole.diras@epa.guam.gov&gt;

Cc: Julie Mendoza &lt;julie.mendoza@epa.guam.gov&gt;, "Lobaton, Bernie" &lt;Bernie.Lobaton@grmc.gu&gt;, Sierra Bettis &lt;sierra.bettis@epa.guam.gov&gt;, Jerry Aquino &lt;jerry.aquino@epa.guam.gov&gt;

Nicole,

Sorry for the delay, We are just waiting for the PWS report from our operator. We will submit it tomorrow once he will forward to us.

Thank you for the consideration.

Happy holidays, !!!!

Roger Arellano

GRMC

**From:** Nicole Diras <nicole.diras@epa.guam.gov>**Sent:** Tuesday, December 10, 2024 4:09 PM**To:** Arellano, Roger L. <Roger.Arellano@GRMC.gu>**Cc:** Julie Mendoza <julie.mendoza@epa.guam.gov>; Lobaton, Bernie <Bernie.Lobaton@GRMC.gu>; Sierra Bettis <sierra.bettis@epa.guam.gov>; Jerry Aquino <jerry.aquino@epa.guam.gov>**Subject:** Re: GRMC Consecutive PWS Monitoring Report-September 2024

**CAUTION:** This email originated from outside the GRMC network. Do not click links or open attachments unless you recognize the sender and know the content is safe. *This warning was created by GRMC Information Security Services.*

Hafa Adai Mr. Arellano and Mr. Lobaton,

This is a friendly reminder email to submit the Monthly Water Monitoring Report by the 10th of each month. If the 10th happens to fall on a weekend, please submit the report to our Guam EPA Administrative Office on the Friday before the deadline.

If you have any questions or concerns, please let us know.

Thank you!

On Fri, Nov 8, 2024 at 11:53 AM Arellano, Roger L. <[Roger.Arellano@grmc.gu](mailto:Roger.Arellano@grmc.gu)> wrote:

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of October 2024.

For your review and comment/s.

Thank you,

Roger

**From:** Nicole Diras <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>

**Sent:** Friday, November 8, 2024 8:26 AM

**To:** Arellano, Roger L. <[Roger.Arellano@GRMC.gu](mailto:Roger.Arellano@GRMC.gu)>

**Cc:** Julie Mendoza <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>; Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; Sierra Bettis <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; Jerry Aquino <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** Re: GRMC Consecutive PWS Monitoring Report-September 2024

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Hafa Adai Mr. Arellano and Mr. Lobaton,

This is a reminder email to submit the Monthly Water Monitoring Report by the 10th of each month. If the 10th happens to fall on a weekend, please submit the report to our Guam EPA Administrative Office on the Friday before the deadline.

If you have any questions or concerns, please let us know.

Thank you!

On Tue, Oct 8, 2024 at 10:58 PM Arellano, Roger L. <[Roger.Arellano@grmc.gu](mailto:Roger.Arellano@grmc.gu)> wrote:

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of September 2024.

For your review and comment/s.

Thank you,

Roger

---

**From:** Arellano, Roger L.

**Sent:** Monday, September 9, 2024 1:47 PM

**To:** 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Cc:** Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; 'Nicole Diras' <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; 'Jerry Aquino' <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** RE: GRMC Consecutive PWS Monitoring Report-August 2024

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of August 2024.

For your review and comment/s.

Thank you,

Roger

---

**From:** Arellano, Roger L.

**Sent:** Wednesday, August 7, 2024 10:14 AM

**To:** 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>

**Cc:** Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; 'Nicole Diras' <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; 'Jerry Aquino' <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>

**Subject:** RE: GRMC Consecutive PWS Monitoring Report-July 2024

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of July 2024.

For your review and comment/s.

Thank you,

Roger

---

**From:** Arellano, Roger L.

**Sent:** Tuesday, July 9, 2024 5:19 PM

To: 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>  
Cc: Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; 'Nicole Diras' <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; 'Jerry Aquino' <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>  
Subject: RE: GRMC Consecutive PWS Monitoring Report-May 2024

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of June 2024.

For your review and comment/s.

Thank you,

Roger

From: Arellano, Roger L.

Sent: Tuesday, June 4, 2024 3:47 PM

To: 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>  
Cc: Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; 'Nicole Diras' <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; 'Jerry Aquino' <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>  
Subject: RE: GRMC Consecutive PWS Monitoring Report-May 2024

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of May 2024.

For your review and comment/s.

Thank you,

Roger

From: Arellano, Roger L.

Sent: Wednesday, May 8, 2024 3:36 PM

To: 'Julie Mendoza' <[julie.mendoza@epa.guam.gov](mailto:julie.mendoza@epa.guam.gov)>  
Cc: Lobaton, Bernie <[Bernie.Lobaton@GRMC.gu](mailto:Bernie.Lobaton@GRMC.gu)>; 'Sierra Bettis' <[sierra.bettis@epa.guam.gov](mailto:sierra.bettis@epa.guam.gov)>; 'Nicole Diras' <[nicole.diras@epa.guam.gov](mailto:nicole.diras@epa.guam.gov)>; 'Jerry Aquino' <[jerry.aquino@epa.guam.gov](mailto:jerry.aquino@epa.guam.gov)>  
Subject: RE: GRMC Consecutive PWS Monitoring Report-March 2024

Julie,

Please see attached Monitoring Report for PWS 00019 ( GRMC) for the month of April 2024.

For your review and comment/s.

Thank you,





# GUAM REGIONAL MEDICAL CITY

Where Patients are Partners

Transmittal No.	143	Date	Dec. 11, 2024
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Subject: GRMC Consecutive PWS no. 0019

To: <b>Bryan Bierden</b> Chief Engineer	From:
Thru: <b>Julie Mendoza</b> Environmental Health Specialist 11 Safe Drinking Water Program	Roger Arellano
	GRMC Facilities Maintenance Manager
Guam Environmental Protection Agency (GEPA)	Guam Regional Medical City (GRMC)

WE ARE SENDING YOU X Attached            Under separate cover via Hand delivery the following items:

Item no	Copies	Dated	Descriptions
1	1	12/11/24	Water monitoring Report
2	1	12/11/24	WERI bacteriological test results and COC
3	1	12/11/24	RTCR Monitoring and Compliance Checklist
4	1	12/11/24	RTCR Sitting Plan

THE ABOVE LISTED DOCUMENTS ARE TRANSMITTED as checked below;

- ☐ For approval
- ☐ For your file
- ☐ As requested
- ☒ For your review and comment

RVD: 12/11/2024  
To NIKKI

Signed: \_\_\_\_\_

Received by: \_\_\_\_\_

Date: \_\_\_\_\_

Mailing Address: PO Box 3830; Hagatna, GU 96932  
Physical Address: 133 Route 3, Dededo, Guam 96929  
Tel: (671) 645-5500 • Fax: (671) 645-5685 • [info.grmc@GRMC.gu](mailto:info.grmc@GRMC.gu) • [www.grmc.gu](http://www.grmc.gu)



**November 2024**

**WATER QUALITY MONITORING RESULTS**  
**For**  
**GUAM REGIONAL MEDICAL CITY (GRMC) CONSECUTIVE PUBLIC WATER**  
**SYSTEM (PWS)**

**REVISED TOTAL COLIFORM RULE (RTCR) & GROUND**  
**WATER RULE (GWR)**

Name of System: GRMC Consecutive Public Water System  
Owner: Guam Regional Medical City  
Location: 133 Route Dededo, Guam 96929  
PWS ID Number: GU-0000019  
Mailing Address: PO Box 3380  
Hagatna, Guam 96932

We are pleased to present the following report on water quality monitoring for the month of November. This report includes the results of testing performed as part of the Safe Drinking Water Standard requirements for RTCR & GRW.

Revised RTCR siting plan for sampling locations of routine, repeat and GWR sampling locations are attached for reference.

**Total Coliform Monitoring.** Total coliform testing was performed according to the RTCR monitoring program for GRMC. Three sampling locations for routine were sampled on November 29, 2024. Samples were immediately placed in the cooler and delivered to University of Guam (UOG)-WERI Laboratory for analysis.

The results for all tests in December 11, 2024 were no detection of total coliform or *E.coli*. The WERI Laboratory reports and chain-of-custody and analysis request for the November samples are attached

**Chlorine Residual.** In accordance with USEPA Ground Water Rule (GWR), the GRMC Consecutive PWS is required to monitor free chlorine residual at same time and locations that total coliform is sampled. In compliance with 4-log inactivation, the system must maintain a free residual at the first service connection of 0.80mg/L or greater. Please see chain-of-custody and analysis requests where the nearest fixture after the first service connection shows above the minimum. Sampled free chlorine residual results are all above the minimum 0.2 mg/L requirement by the system.

## WATER QUALITY ANALYSIS (WQA) REPORT

11 DECEMBER 2024

WQA REPORT NO. : **W2025-0217**

**GUAM REGIONAL MEDICAL CITY**  
133 Route 3  
Dededo, Guam 96929

SERVICE ORDER NO. : 20250028  
PERMIT NO. : PWS ID# GU-0000019  
POINT OF CONTACT : Almer Santos  
PHONE NO. : (671) 864-2568

The UOG WERI Water Quality Laboratory (Guam Environmental Protection Agency Certification No. 24-01, including addenda certifications (i.e., 24-001, etc.), valid through 09 December 2026) is certified in accordance with the Guam Safe Drinking Water Act and the requirements specified in the U.S. EPA Manual for Certification of Laboratories Analyzing Drinking Water, 5th edition. The result(s) indicated in this report specifically apply to the sample(s) registered under the above Water Quality Analysis Report Number. Analysis/analyses was/were performed using the latest method revision(s). On behalf of the above company/client/customer/addressee, the sample(s) was/were collected and submitted by individuals who was/were provided with guidelines regarding the proper sampling and handling techniques required by U.S. EPA, Standard Methods or 40 Code of Federal Regulations §141.21 to §141.24, and it is assumed that these individuals followed those instructions. The sample(s) submitted to the UOG WERI Water Quality Laboratory has/have been accepted and tested as representative sample(s) of the above identified company's/client's/customer's/addressee's expectations and requirements. The company/client/customer/addressee identified above shall be responsible for the integrity of the sample(s) during their collection and transit to the Laboratory. This report shall not be revised, reproduced, or reprinted, except in full, without prior authorization and notice from the UOG WERI Water Quality Laboratory.

### INFORMATION & DETAILS

SAMPLE DATE/TIME	: 11/29/2024	@	0745H	SAMPLED BY	: Almer Santos
RECEIVED DATE/TIME	: 11/29/2024	@	1017H	RELINQUISHED BY	: Jimeline Osorio
SAMPLE TYPE	: Drinking water (treated)				
FACILITY/LOCATION	: GRMC Consecutive Public Water System-Route 3, Dededo, Guam				
PROJECT ID/NAME	: -				
NOTE/COMMENT(s)	: -				

### RESULTS

WERI LAB ID NO.	: <b>W2025-0217-01</b>	DATE ANALYZED	: 11/29/2024
SPECIFIC DESCRIPTION/ LOCATION	: D-08 Dietary KS#3 (LL)	DATE COMPLETED	: 11/30/2024

TEST/ANALYTE <sup>5</sup>	METHOD	RESULT <sup>3</sup>	UNIT <sup>4</sup>	MAX. LIMIT <sup>1,3</sup>	MRL <sup>2,3</sup>
TOTAL COLIFORM	SM9223B / COLILERT®	A(-) ✓	A(-)/100mL	A(-)	A(-)
<i>E. coli</i> ( <i>Escherichia coli</i> )	SM9223B / COLILERT®	A(-)	A(-)/100mL	A(-)	A(-) or NR

WERI LAB ID NO.	: <b>W2025-0217-02</b>	DATE ANALYZED	: 11/29/2024
SPECIFIC DESCRIPTION/ LOCATION	: CE-212 Staff Lounge (2 <sup>nd</sup> Floor)	DATE COMPLETED	: 11/30/2024

TEST/ANALYTE <sup>5</sup>	METHOD	RESULT <sup>3</sup>	UNIT <sup>4</sup>	MAX. LIMIT <sup>1,3</sup>	MRL <sup>2,3</sup>
TOTAL COLIFORM	SM9223B / COLILERT®	A(-) ✓	A(-)/100mL	A(-)	A(-)
<i>E. coli</i> ( <i>Escherichia coli</i> )	SM9223B / COLILERT®	A(-)	A(-)/100mL	A(-)	A(-) or NR

WERI LAB ID NO.	: <b>W2025-0217-03</b>	DATE ANALYZED	: 11/29/2024
SPECIFIC DESCRIPTION/ LOCATION	: PE-436 Medication Room (4 <sup>th</sup> Floor)	DATE COMPLETED	: 11/30/2024

TEST/ANALYTE <sup>5</sup>	METHOD	RESULT <sup>3</sup>	UNIT <sup>4</sup>	MAX. LIMIT <sup>1,3</sup>	MRL <sup>2,3</sup>
TOTAL COLIFORM	SM9223B / COLILERT®	A(-) ✓	A(-)/100mL	A(-)	A(-)
<i>E. coli</i> ( <i>Escherichia coli</i> )	SM9223B / COLILERT®	A(-)	A(-)/100mL	A(-)	A(-) or NR

## WATER QUALITY ANALYSIS (WQA) REPORT

11 DECEMBER 2024

WQA REPORT NO. : **W2025-0217**

**GUAM REGIONAL MEDICAL CITY**  
133 Route 3  
Dededo, Guam 96929

SERVICE ORDER NO. : 20250028  
PERMIT NO. : PWS ID# GU-0000019  
POINT OF CONTACT : Almer Santos  
PHONE NO. : (671) 864-2568

Maximum contaminant levels (MCL) or Treatment Techniques (TT) as stated in the National Primary Drinking Water Standards (NPDWS), National Secondary Drinking Water Standards (NSDWS) (P), and/or as specified by the respective customer/client (\*).  
MRL=Method reporting limit and, where applicable, shall vary per customer/client and per program, testing, or monitoring limits.  
NR=Not reported. INC=Inconclusive. OH=On Hold; Pending. ND=Not Detected. "-" (dash)=Not Applicable; None. { }=Nonconformance/noncompliance to the specified MCL, TT, or limit. Indications in *italics* represent MRL variations per sample treatments.  
A(-)=Absent; Negative. P(+)=Present; Positive. MPN=Most Probable Number. µg/L=micrograms per Liter. mg/L=milligrams per Liter. N=Nitrogen; P=Phosphorus; CaCO<sub>3</sub>=Calcium carbonate; SDS=Sodium dodecyl benzene sulfate. ppm=parts per million. ppb=parts per billion. ppt=parts per trillion. NTU=Nephelometric Turbidity Unit. PCU=Platinum-Cobalt Unit. SU=Standard Unit. µS/cm=MicroSiemens per centimeter. mS/cm=MilliSiemens per centimeter.  
Laboratory may execute pre-treatment (e.g., neutralization (N), dechlorination (D), dilution (D), and filtration (F)) and/or post-treatment (e.g., filtration (F) and preservation (P)) techniques for proper sample handling, storing, and testing; as such, result will represent the treated condition of the sample. Specifically, for metals, nitric acid digestion is required for a specific period prior to any elemental analysis.

**NOTIFICATION(S):**

None.

**AUTHORIZED SIGNATORY**



Mallery Duenas  
Laboratory Manager

Chain-of-Custody (COC) & Analysis Request

Customer/Client Status: ☐ New ☒ Existing

CUSTOMER/CLIENT INFORMATION

Client/Customer Name : Guam Regional Medical City POC Name: Almer Santos  
Mailing/Physical Address : 133 Route 3, Dededo, Guam 96929 Phone# 671-864-2568  
Bldg. Permit# (if applicable) : GU-0000019 PO/RPO/Agreement # \_\_\_\_\_ E-mail : santosalmer@yahoo.com

SAMPLE TYPE ☒ Drinking water (treated) ☐ Ground water ☐ Surface water (marine, river, etc.)  
Check (✓) applicable ☐ Recreational water (pools, etc.) ☐ Wastewater (effluent, etc.) ☐ Other/s: \_\_\_\_\_

TURN-AROUND-TIME ☐ Regular (7 working days) ☐ Rush (5 working days) ☐ Urgent (3 working days)  
Check (✓) applicable 2 x Total Analysis Cost/  
pre-payment required 3 x Total Analysis Cost/  
pre-payment required

SAMPLE DELIVERY ☐ Customer/client ☐ Courier ☒ EPA-certified Operator ☐ Business/Agency

SAMPLE INFORMATION

Sampled by (Name/Agency): Almer Santos Witnessed by (Name/Agency): \_\_\_\_\_

Facility/Residential Name and Location : GRMC Consecutive Public Water System-Rt3, Dededo, Guam

Notes/Instructions:

Temp @ 13°C

Specific Description/Location	Date	Time	Volume	ANALYSIS REQUESTED				WERI LAB ID#			
				001 TC (P/A)	001 EC (P/A)	Lead (Pb)	Copper (Cu)				
1. D-08 Dietary KS#3 (LL)	11/29/24	7:45	100 ml	(-)	(-)	X	X				W2025-0217-01
2. CE-212 Staff Lounge (2nd Flr)	11/29/24	7:52	100 ml	(-)	(-)	X	X				-02
3. PE-436 Medication Rm (4th Flr)	11/29/24	8:02	100 ml	(-)	(-)	X	X				-03

Acknowledgment: ☒ By relinquishing the/these sample(s), I acknowledge the WERI Laboratory will submit/forward nonconforming analysis results to appropriate regulatory parties (GEPA, DPHSS, etc.) in the event any above mentioned analyses exceeds and/or does not conform to local and/or national drinking water standards, rules, and regulations.

Relinquished by Jimelene Osorio Date: 11/29/2024 Time: 9:00  
Sampler/Collector *[Signature]* Print/Sign

Received by \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
Delivery/Receiver *[Signature]* Print/Sign

Reviewed/Accepted by: *[Signature]* Date: 11/24/2024 Time: 1017  
WERI LAB

**\*\* WERI OFFICIAL USE \*\***

WERI Lab Order # 20250028  
Pymt. Receiving Agent/Date \_\_\_\_\_  
UOG WERI FR # \_\_\_\_\_  
WERI Invoice # 20250025-C

PAYMENT DETAILS	
<input type="checkbox"/> Cash \$ _____	<input type="checkbox"/> Check \$ _____ # _____
<input type="checkbox"/> Funds Transfer Acct # (inter-agency; approval req.) _____	
<input type="checkbox"/> Credit Card \$ _____	Auth. Code# _____



# RTCR monitoring and reporting compliance checklist for Public Water Systems serving 1000 people or less

Please note: If the PWS is subject to the Ground Water Rule (GWR), this guidance document does not cover any of the GWR requirements. Please contact the Guam EPA safe drinking water program director.

- These tables provide a checklist of actions that systems must take if they have a violation or certain events occurred (for example, a total coliform-positive sample, an *E. coli*-positive sample or an assessment trigger) during their monitoring period.
- Systems must take appropriate actions to protect public health in a timely manner, for example, notify the regulatory agency, issue public notification, conduct an assessment, monitor at a more frequent rate, etc.
- Go through the entire checklist, excluding the items that are not applicable, for example, for community water systems, skip the items that are specific to non-community water systems.

PWS Name	Guam Regional Medical Center (GRMC) Consecutive Public Water System		
PWS ID	GU-0000019	RTCR Monitoring Period (MM/YY)	11/24

A. Do you have a total coliform-positive <b>ROUTINE</b> sample?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If you answered <b>yes</b> , take the following action(s):	Check when completed	
• Notify your regulatory agency.	<input type="checkbox"/>	
• Provide a copy of the Microbiological Sample Siting Plan (MSSP) to your regulatory agency if the MSSP has not been submitted previously.	<input type="checkbox"/>	
• Take 3 repeat samples within 24 hours of being notified of your result, and send these samples to the lab immediately. Refer to the MSSP for sampling locations.	<input type="checkbox"/>	
• Make sure the lab tests the total coliform-positive ROUTINE sample for the presence of <i>E. coli</i> .	<input type="checkbox"/>	
If you answered <b>no</b> , continue with your ROUTINE monitoring.		

B. Do you have an <i>E. coli</i> -positive <b>ROUTINE</b> sample?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If you answered <b>yes</b> , take the following action(s):	Check when completed	
• Notify your regulatory agency by the end of the business day (5 pm) when you learn of the positive result, or by the end of the next business day if you learn of the positive result after the agency office is closed and the agency has no after-hours notification system.	<input type="checkbox"/>	

C. Do you have a total coliform-positive <b>REPEAT</b> sample?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If you answered <b>yes</b> , take the following action(s): See Section E, for triggering the Level 1 Assessment.	Check when completed	
• Make sure the lab tests the total coliform-positive REPEAT sample for the presence of <i>E. coli</i>	<input type="checkbox"/>	

D. Do you have an <i>E. coli</i> MCL violation? If yes, indicate what caused the violation, below.	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
• An <i>E. coli</i> -positive repeat sample following a total coliform-positive routine sample.	<input type="checkbox"/>	<input checked="" type="checkbox"/>



# **RTCR monitoring and reporting compliance checklist for Public Water Systems serving 1000 people or less**

• A total coliform positive repeat sample following an <i>E. coli</i> -positive routine sample.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure to collect all required repeat samples following an <i>E. coli</i> -positive routine sample.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure to test for <i>E. coli</i> when any of the repeat samples is total coliform-positive.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "D" above, take the following action(s):</b>	<b>Check when completed</b>	
• Notify your regulatory agency by the end of the business day (5 pm) when you learn of the <i>E. coli</i> MCL violation, or by the end of the next business day if you learn of the MCL violation after the agency office is closed and the agency has no after-hours notification system.	<input type="checkbox"/>	
• Notify the public by issuing a Tier 1 public notice (PN) ( <b>Boil Water Advisory</b> ) as soon as practical but no later than 24 hours after learning of the <i>E. coli</i> MCL violation.	<input type="checkbox"/>	
• Within 10 days of issuing the public notice (PN), provide a copy and the Certificate of Public Notice Distribution to the regulatory agency and copy Guam EPA.	<input type="checkbox"/>	
• Make sure a Level 2 Assessment is conducted. See Item F.	<input type="checkbox"/>	
• If you are on quarterly or annual monitoring, go to increased (MONTHLY) monitoring beginning the following month.	<input type="checkbox"/>	

<b>E. Did you trigger a Level 1 Assessment? If yes, indicate what caused the trigger, below.</b>	<b>Yes</b>	<b>No</b>
• Two or more total coliform-positive samples in the same sampling period (include results of both routine and repeat samples).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure to take every required repeat sample after any single routine total coliform-positive sample.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "E" above, take the following action(s):</b>	<b>Check when completed</b>	
• Have the owner or operator perform a Level 1 assessment.	<input type="checkbox"/>	
• After the Level 1 assessment has been conducted, correct all sanitary defects found and submit the Level 1 Assessment form to your regulatory agency within 30 days of learning of the trigger.	<input type="checkbox"/>	

<b>F. Did you trigger a Level 2 Assessment? If yes, indicate what caused the trigger, below.</b>	<b>Yes</b>	<b>No</b>
• An <i>E. coli</i> MCL violation (See Section D., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• A second Level 1 trigger within a rolling 12-month period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• For systems on approved reduced annual monitoring, a Level 1 treatment technique trigger in two consecutive years.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "F" above, take the following action(s):</b>	<b>Check when completed</b>	

# **RTCR monitoring and reporting compliance checklist for Public Water Systems serving 1000 people or less**

• Check with your regulatory agency to determine who can conduct a Level 2 Assessment.	<input type="checkbox"/>
• After the Level 2 Assessment has been conducted, correct all sanitary defects found and submit the Level 2 Assessment form to your regulatory agency within 30 days of learning of the trigger.	<input type="checkbox"/>

G. Do you have a treatment technique violation? If yes, indicate what caused the violation, below.	Yes	No
• Failure to conduct a required assessment within the required time period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure to perform corrective actions within the required timeframe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Seasonal system: Failure to complete a primacy agency-approved start-up procedure.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered <b>yes</b> to any of the items in "G" above, take the following action(s):	Check when completed	
• Report the violation to your regulatory agency no later than the end of the next business day after you learn of the violation.	<input type="checkbox"/>	
• Notify the public by issuing a Tier 2 public notice as soon as practical but no later than 30 days after learning of the violation.	<input type="checkbox"/>	
• Within 10 days of issuing the public notice (PN), provide a copy and the Certificate of Public Notice Distribution to the regulatory agency and copy Guam EPA.	<input type="checkbox"/>	

H. Do you have a monitoring violation? If yes, indicate what caused the violation(s), below.	Yes	No
• Failure to take all required routine and additional routine samples.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• <i>E. coli</i> not analyzed following a total coliform-positive routine sample.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered <b>yes</b> to any of the items in "H" above, take the following action(s):	Check when completed	
• Report the violation to your regulatory agency within 10 days of learning the violation.	<input type="checkbox"/>	
• Notify the public by issuing a Tier 3 public notice within a year of learning of the violation.	<input type="checkbox"/>	
• Within 10 days of issuing the public notice (PN), provide a copy and the Certificate of Public Notice Distribution to the regulatory agency and copy Guam EPA. <i>Community water systems may utilize the Consumer Confidence Report to issue the PN, if the system meets the requirements in rule.</i>	<input type="checkbox"/>	

I. Do you have a reporting violation? If yes, indicate what caused the violation(s), below.	Yes	No
• Failure to submit the monitoring report (within 10 days after the end of the monitoring period) after system properly conducts monitoring.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

# **RTCR monitoring and reporting compliance checklist for Public Water Systems serving 1000 people or less**

• Failure to submit the assessment form within required timeframe after system properly conducts an assessment.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure to notify your regulatory agency of an <i>E. coli</i> -positive sample within the required timeframe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Failure of a seasonal system to certify that they have completed the start-up procedure before serving water to the public (the notice must be submitted at least 10 days prior to serving water).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "I" above, take the following action(s):</b>	<b>Check when completed</b>	
• Notify the public by issuing a Tier 3 public notice within a year of learning of the violation.	<input type="checkbox"/>	
• Within 10 days of issuing the public notice (PN), provide a copy and the Certificate of Public Notice Distribution to regulatory agency and copy Guam EPA. <i>Community water systems may utilize the Consumer Confidence Report to issue the PN, if the system meet the requirements in rule.</i>	<input type="checkbox"/>	

<b>J. If you are a non-community water system (including seasonal systems) on a QUARTERLY monitoring schedule, did any of these events occur?</b>	<b>Yes</b>	<b>No</b>
• A Level 2 Assessment or two Level 1 Assessments are triggered in a rolling 12-month period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• An <i>E. coli</i> MCL violation (See Section D., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• A coliform treatment technique violation (See Section G., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Two monitoring violations in a rolling 12-month period (See Section H., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• One monitoring violation and one Level 1 Assessment in a rolling 12-month period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "J" above, take the following action(s):</b>	<b>Check when completed</b>	
• Begin monthly monitoring the month following the trigger event(s).	<input type="checkbox"/>	

<b>K. If you are a non-community water system (including seasonal systems) on an ANNUAL monitoring schedule, did any of the following events occur?</b>	<b>Yes</b>	<b>No</b>
• Level 2 Assessment or two Level 1 Assessments are triggered in a rolling 12-month period.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• An <i>E. coli</i> MCL violation (See Section D., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• A coliform treatment technique violation (See Section G., above).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>If you answered <b>yes</b> to any of the items in "K" above, take the following action(s):</b>	<b>Check when completed</b>	
• Begin monthly monitoring the month following the trigger event(s).	<input type="checkbox"/>	



# **RTCR monitoring and reporting compliance checklist for Public Water Systems serving 1000 people or less**

<b>L. If you are a non-community water system (including seasonal systems) on an ANNUAL monitoring schedule, did the following event occur?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>A monitoring violation (See Section H., above).</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered yes to any of the items in "L" above, take the following action(s):	Check when completed	
<ul style="list-style-type: none"> <li>Begin QUARTERLY monitoring the calendar quarter following the trigger event(s).</li> </ul>	<input type="checkbox"/>	

<b>M. If you are a community water system on a QUARTERLY monitoring schedule, did any of the following events occur?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Loss of certified operator (the system did not have continuous coverage).</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>A Level 2 Assessment or two Level 1 Assessments triggered in a rolling 12-month period.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>An <i>E. coli</i> MCL violation (See Section D., above).</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>A coliform treatment technique violation (See Section G., above).</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Two monitoring violations in a rolling 12-month period.</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
If you answered <b>yes</b> to any of the items in "M" above, take the following action(s):	Check when completed	
<ul style="list-style-type: none"> <li>Begin MONTHLY monitoring the month following the trigger event(s).</li> </ul>	<input type="checkbox"/>	

**For assistance, please contact your regulatory agency or Guam EPA:**

Guam Environmental Protection Agency  
 Safe Drinking Water Program  
 P.O. Box 22439  
 GMF Barrigada, Guam 96921  
 Desk: 671-300-4779 | Fax: 671-300-4531  
[brian.bearden@epa.guam.gov](mailto:brian.bearden@epa.guam.gov)

## GRMC Consecutive PWS Revised Total Coliform Rule (RTCR) Siting Plan

3 sample/month	Routine sample location	Repeat sample locations	GWR sample location (any ground water sources operating at the time of a routine TC+)
November 2024	1) D-08 Dietary Kitchen Sink #3 (LL)	1) D-08 Dietary Kitchen Sink #3 (LL)	Point of Entry ( 4"Ø Backflow Preventer)
	(within 5 taps upstream)	2) D-08 Dietary Kitchen Sink #2 (LL)	
	(within 5 taps downstream)	3) D-08 Dietary Kitchen Sink #4 (LL)	
	3) CE-212 Staff Lounge Sink (2 <sup>nd</sup> Flr.-EW)	1) CE-212 Staff Lounge Sink (2 <sup>nd</sup> Flr.-EW)	
	(within 5 taps upstream)	2) CE-203 CSSD Staff Lounge (2 <sup>nd</sup> Flr.-EW)	
	(within 5 taps downstream)	3) CE-213 Male Locker Rm. (2 <sup>nd</sup> Flr.-EW)	
	3) PE-436: Medication Rm. (4 <sup>th</sup> Flr.)	1) PE-436: Medication Rm. (4 <sup>th</sup> Flr.-WW)	
	(within 5 taps upstream)	2) PE-437: Nourishment (4 <sup>th</sup> Flr.-WW)	
	(within 5 taps downstream)	3) PE-434: Clean Supply (4 <sup>th</sup> Flr.-WW)	

