MOR compliance: Improving common problems

- Do Not Handwrite
  - Illegible
  - Error prone

- Use Microsoft Excel
  - Calculations are completed automatically
  - Errors easily identified and corrected

- Computer access is available to everyone
  - Administrative offices
  - Public Libraries

- Create redundancy in training
  - Valuable experience and knowledge is lost if a system fails to train replacements before staff leave
  - Ensure multiple individuals are trained to complete compliance obligations
  - If responsible party is absent, retires, or unexpectedly leaves, there should always be another individual trained and readily available to complete required duties
MOR compliance: Improving common problems

Enter the report date as the relevant monitoring period for the data as MM/YYYY, not the current month (if submitting in March, the monitoring period would be February).

Always enter the PWSID as KY followed by the 7 digit ID number KY1234567.

Water producers enter plant ID as A, B, C, etc. If only one plant enter A.
MOR Compliance

MOR page 5 Water Quality
Plant Tap/Entry Point Chlorine Residuals

All water producers must report the lowest amount of chlorine leaving the plant and entering the distribution system everyday of plant operation.

Use either an online chlorine analyzer OR a grab sample for all disinfectants except chloramine.

For chloramine report total chlorine.

Enter the lowest sample reported each day. Enter only one value per line. Do not enter zero for no production days, either leave blank or write closed.

Ensure the summary numbers are complete and accurate.

If your system uses chloramines enter Y. Otherwise enter N.

Report free chlorine for all disinfectants except chloramine.

For chloramine report total chlorine.
Transfer MOR page 5 data to plant summary

Compliance is primarily determined based on the summary pages. It is imperative that the summary pages are complete and accurate.

Ensure that the data corresponds between plant tap/entry point minimum chlorine residuals and the summary page.

Means total number of minimum chlorine samples NOT how many samples were at the lowest value. To be in compliance, this number should be equal to the number of days of plant operation.

If using excel, cells will auto-populate from preceding data pages, except Y/N questions.
## MOR page 7 Distribution

Distribution System Chlorine Residuals

**Community Systems:** Must report at least one chlorine residual **everyday**

*Non-Community Systems:** Must report at least one chlorine residual **everyday the system is open** and serving water to the public

A system with multiple plants will have the same distribution chlorine residuals for both plants’ MORs

If a system purchases both chlorine and chloramine within the same month, report total chlorine for all samples

Enter at least one chlorine sample everyday.* Reporting multiple daily samples will ensure full coverage and help avoid instances of missing data. Skipping a day will result in a violation

*For months with less than 31 days, write NA*

Ensure the summary numbers are complete and accurate

**Community:** Total days of distribution must equal the number of days in the month

**Non-Community:** Total days system was open and serving water to the public

Free chlorine must be reported for all disinfectants except chloramine. For chloramine report total chlorine

If your system uses chloramines enter Y. Otherwise enter N
Transfer MOR page 7 data to distribution summary

Compliance is primarily determined based on the summary pages. It is imperative that the summary pages are complete and accurate.

Ensure that the data corresponds between distribution chlorine residuals and the summary page.

If using excel, cells will auto-populate from preceding data pages, except Y/N questions.
MOR page 8 Turbidity Report Plant Tap Turbidity Readings

All surface water producers and groundwater under the influence of surface water must report turbidity every 4 hours of plant operation.

Record hours of plant operation everyday. If there is any plant downtime, adjust hours appropriately.

Ensure the summary numbers are complete and accurate.

Number of samples required is determined by the number of hours operated divided by 4, and rounded up to the next whole number.

If total samples reported is less than 95% of total samples required a system will receive a violation.
Transfer MOR page 8 data to plant summary  

Compliance is primarily determined based on the summary pages. It is imperative that the summary pages are complete and accurate.

Ensure that the data corresponds between turbidity report and the summary page.

If using excel, cells will auto-populate from preceding data pages, except Y/N questions.
Plant ID must be A, B, C, etc. If only one plant, enter A.

SW and GUI systems must complete the turbidity boxes.

Plant Summary

All water producers must complete the plant summary.

If using excel, cells will auto-populate from preceding data pages, except Y/N questions.

Once all data is complete and accurate, sign and date.
Distribution Summary

All systems must complete the distribution summary. Once all data is complete and accurate, sign and date.

Enter water transactions using the appropriate **PWSID** (KY, TN, WV, or OH followed by the 7 digit ID number KY1234567) **NOT** the system name.

Enter the total gallons as 1,234,567 **NOT** 1.23 M.G.

Ensure the summary data is complete and accurate, as previously described.
MOR Compliance: Final reminders

- Review all data before signing and dating the MOR
- Your signature acknowledges that all data within the MOR is true, accurate, and complete
- The MOR must arrive to the DOW within 10 days after the monitoring period
- Mail certified to guarantee delivery. A failure to submit violation will not be rescinded unless the water system has proof of delivery (certified mail receipt)
- Mail to:
  Division of Water
  Drinking Water Branch 3rd Floor
  300 Sower Blvd
  Frankfort, KY 40601
  Attn: MOR DWB
- If any errors are found after submitting to the state, notify the compliance officer immediately and send a correction