BEST PRACTICES AND RESOURCES FOR BUILDING THE CAPACITY OF NON-COMMUNITY WATER SYSTEMS

The following table summarizes the recommendations from the State-EPA Non-Community Water System Workgroup for strengthening the capacity of non-community water systems (NCWSs). The workgroup was made up of 8 state agency representatives, several EPA headquarters and regional office representatives, and representatives of the Association of State Drinking Water Administrators. The workgroup met regularly between June 2012 and February 2013 to address the issues faced by NCWSs and the state programs responsible for regulating them.

The table below lists each of the Workgroup recommendations, followed by a compilation of tools, resources and suggested approaches (best practices) and examples of each, that relate to a particular recommendation. All aspects of NCWS capacity-building are addressed: technical, managerial and financial. For resources that are available on the internet, links are provided; otherwise a contact person is listed who can provide further information on a particular resource or practice. The table will be periodically updated to reflect changes and new products or practices. If you are aware of any relevant tools, products, practices or information resources that you think should be added to the list, please contact Steve Hogye of EPA's Office of Ground Water and Drinking Water at Hogye.stephen@epa.gov or 202-564-0631.

An EPA publication summarizing the NCWS Workgroup findings and recommendations in more detail is expected to be posted on EPA's web page and this site sometime in Spring or early Summer, 2014.

| Recommendation 1: Conduct outreach and education specific to the needs of NCWSs | | |
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| 1.1 Provide outreach materials, including guidance, checklists, monitoring schedules and other tools to help NCWSs understand their responsibilities | | |
| Sanitary Survey Preparation Checklist (EPA R8). One-page flyer that contains a checklist on how to prepare for a sanitary survey. | Contact Tiffany Mifflin, mifflin.tiffany@epa.gov. http://www.epa.gov/region8/waterops/ | Create p |
| Certified Operator Status Document (UT). One-page document that provides system-specific information about whether a system has a certified operator and describes the grade/certification level of the operator. | Accessible upon login to http://www.drinkingwater.utah.gov/ (For login information, contact Colt Smith: (801) 536-4155 or acsmith@utah.gov) | practical tools f |
| NTNCWS Sampling Calendar (MN, KS) Sampling calendar for NTNCWSs for lead and copper and total coliform to remind systems when samples are due. Kansas' sampling calendar | (KS) Contact Cathy Tucker-Vogel: <u>CTuckerv@kdheks.gov</u> (MN) Contact Jerry Smith: <u>Gerald.smith@state.mn.us</u> | for NCWSs |

| Accessible upon login to http://www.drinkingwater.utah.gov/ | |
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| Contact Erika Bonenfant: <u>Erika.Bonenfant@maine.gov</u> . | |
| For information, contact Tiffany Mifflin, mifflin.tiffany@epa.gov. http://www.epa.gov/region8/waterops/ | |
| http://nepis.epa.gov/Adobe/PDF/P100GRDZ.pdf | |
| http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/dwp- services/swp/sourwaterprotection.htm | Create prac |
| http://www.michigan.gov/documents/deq/deq-wb-dwehs-wcu-disinfectmanual_221334_7.pdf | Create practical tools for NCWSs |
| Accessible upon login to http://www.drinkingwater.utah.gov/ | Ss to use |
| http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/bwo-notice2.pdf | |
| http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/do-not-drink- notice.pdf | |
| | http://www.drinkingwater.utah.gov/ Contact Erika Bonenfant: Erika.Bonenfant@maine.gov. For information, contact Tiffany Mifflin, mifflin.tiffany@epa.gov. http://www.epa.gov/region8/waterops/ http://nepis.epa.gov/Adobe/PDF/P100GRDZ.pdf http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/dwp- services/swp/sourwaterprotection.htm http://www.michigan.gov/documents/deq/deq- wb-dwehs-wcu-disinfectmanual_221334_7.pdf Accessible upon login to http://www.drinkingwater.utah.gov/ http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/bwo-notice2.pdf http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/do-not-drink- |

| <u>Do Not Use Water Notice Template</u> (ME). <i>One-page fill-in-the-blank Do Not Use Water notice</i> . | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/do-not-use-notice.pdf | |
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| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sycommunication materials, utilizing social media, coordinating materials for on-site visits in plain English. | | |
| Starting Up Your Seasonal Water System Document (ME). One-page handout for seasonal water systems or water systems that operate only part of the year. | https://www.maine.gov/dhhs/mecdc/environmental-health/water/resources/wakeupyourwatersystem.htm | Develop short, topical address specific issues |
| Best Management Practices for Schools and Child Care Facilities (EPA HQ). These guides are intended to assist school officials and child care providers with maintaining and ensuring the safety of their drinking water systems. One guide is specifically designed for child care facilities and schools with their own well, and the other guide is designed for child care facilities and schools served by municipal water systems. | For Schools and Child Care Facilities with their own drinking water source: http://water.epa.gov/infrastructure/drinkingwat er/schools/upload/epa816b13001.pdf For Schools and Child Care Facilities served by municipal water systems: http://water.epa.gov/infrastructure/drinkingwat er/schools/upload/epa816b13002.pdf | ort, topical guides to cific issues. |
| Sampling Factsheets (MI). Eighteen-page document containing seven factsheets, showing sampling protocol for: coliform, nitrate/nitrite, volatile organic contaminants, synthetic organic contaminants, inorganic contaminants, and lead and copper. Also contains a Drinking Water Contingency Plan and arsenic information. The factsheets describe what sampling is required, taking samples, interpreting sample results, dealing with problems that may occur and creating contingency plans. | http://www.michigan.gov/documents/deq/deq-wb-dwehs-noncomm-samplingfactsheets_300937_7.pdf | Develop short, topical guides |
| How-To-Guide for TNCWS (NH, MA). New Hampshire and Massachusetts have developed How-To-Guides for TNCWS. They include basic information on sampling, testing, reporting, protecting wells from contamination and cross-contamination, where to go for technical assistance, how to sample and read results. The guide also provides contact information for additional technical assistance. | A Business Owner's Guide to Complying with MA State Drinking Water Rules http://www.neiwpcc.org/neiwpcc_docs/MAtncg_uide.pdf A Business Owner's Guide to Complying with NH State Drinking Water Rules http://www.neiwpcc.org/neiwpcc_docs/NHTNC WaterGuide2007.pdf TNC: Managing Your TNC Drinking Water System http://www.mass.gov/dep/water/compliance/tn_cman.pdf New Drinking Water System Self Guide: TNC Source Pumping Less than 10,000 GPD or 7 GPM http://www.mass.gov/dep/water/drinking/nwtn_c10k.pdf | l guides to address specific issues. |

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| New Public Water Systems Letter (NV). Ten-page letter to new TNCWSs on how to attain an operating permit. It covers the following requirements: design/construction, water quality standards and specific water system plans (operations/maintenance, emergency and cross connection | http://ndep.nv.gov/bsdw/nws.htm, or contact: Andrea Seifert, ASeifert@ndep.nv.gov; or Jim Balderson, jbalderson@ndep.nv.gov | |
| Institutional Owners: United States Forest Service Water Systems Presentation (UT). Technical, detailed PowerPoint presentation on common deficiencies at PWS covering disinfection procedures, seasonal operation, investigative sampling, PWS regulations, and operation and maintenance. The audience is the U.S. Forest Service. | Contact Ken Bousfield, kbousfield@utah.gov | |
| New System Packet (MN). The New System Packet, which is a folder for NTNCWSs and TNCWSs, contains reference materials and information for the water system, including: basic PWS operations, a description of what to sample and recent newsletters (specific to the water system type). | Contact Jerry Smith for information, gerald.smith@state.mn.us | |
| Seasonal Water System Start-Up Procedures (NV). The state is working with seasonal systems to develop a template for start-up and shut-down procedures for seasonal systems. Seasonal systems are also required to take a bacteriological sample before beginning to serve water. | Contact Latricia Lord, <u>llord@ndep.nv.gov</u> | |
| <u>Seasonal Water System Checklist</u> (OH). <i>Seasonal NCWS start-up and shut-down checklist.</i> | http://www.epa.state.oh.us/portals/28/docume nts/pws/seasonal_checklist.pdf | Develop address |
| Monitoring and Reporting Requirements Calendar (EPA R8). Two-page document which contains PWS inventory information and rule managers' contact information. Describes monitoring for all contaminants throughout the year. | Contact Tiffany Mifflin, mifflin.tiffany@epa.gov | Develop short, topical guide address specific issues. |
| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sys distribution system maintenance document highlighting best m the primacy agency visits seasonal and other ground water syst suggest modifying existing resources to meet state-specific nee | anagement practices that can be handed out when tems. In addition, Workgroup members also | guides to |
| Ground Water Rule Factsheet (ME). One-page factsheet about how the Ground Water Rule affects water systems. | http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/rules- policies/documents/GroundwaterRule.pdf | Prepare short, targeted guide |
| NCWS Owners Guide (MI). Two-page tri-fold with basic NCWS requirements. Contains introductory information, including public water systems definition, requirements, sampling, public water system fees and recordkeeping, sanitary survey information and roles/responsibilities of a NCWS owner. | http://www.michigan.gov/documents/deq/deq-wb-dwehs-noncomm-noncommownersguide 197737 7.pdf | Prepare short, targeted guides and |

| Water Contamination: Guidance for Eating Establishments during a Boil Water Order or Advisory (ME). Two-page factsheet that explains what a boil water order or boil water advisory is and what to do about it if the establishment serves food or beverages. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/rules-policies/documents/GroundwaterRule.pdf | |
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| What Public Water System Consumers Should Know About Boil Water Orders Factsheet (ME). One-page factsheet that educates PWS customers about what to do when the PWS notifies its customers about boil water orders. | http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/BWO-consumer- guidance.pdf | |
| Double-Walled Home Heating Oil Tanks Factsheet (ME). Two- page factsheet for PWS customers. The objective of the factsheet is to educate homeowners about installation of heating oil tanks in order to help with source water protection objectives. | http://www.maine.gov/dep/waste/aboveground tanks/documents/DoubleWallHomeHeatingOilFa ctSheetJan2010.pdf | |
| Public Water Systems and Setbacks from Underground Storage Tanks Factsheet (ME). One-page factsheet about requirements for replacement wells, expanding water systems and the buffer zone for wells for source water protection. | Contact Erika Bonenfant, <u>Erika.Bonenfant@maine.gov</u> . | |
| Protecting Your Home: Cross Connections & Backflow Prevention Factsheet (ME). Two-page handout for homeowners about cross connection and backflow prevention. | Contact Erika Bonenfant: <u>Erika.Bonenfant@maine.gov</u> . | |
| Source Water Protection Guide for Non-community Water Supplies (MI). Six-page document with susceptibility information for source water protection. Contains a checklist and action item list for water systems about how to mitigate source water contamination. | http://www.michigan.gov/documents/deq/deq-wb-dwehs-noncomm-swpguide_257149_7.pdf | Prepare short, targeted guides |
| Emergency Response Plan of Action Document (ME). Fourteen-page document which covers preparation and planning for an emergency event where safe drinking water supply is disrupted. Outlines emergency disinfection steps, bulk water hauling and PWS inventory checklist. | http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/documents/plan-action- 500.pdf | |
| Do's and Don'ts: Protecting Your Wellhead and Drinking Water Supply Factsheet (ME). Two-page factsheet on source water protection. Materials can be used by many water systems to distribute to customers. | http://www.maine.gov/dhhs/mecdc/environme ntal- health/water/resources/serviceconnection/docu ments/do-s-don-ts-whp-area.pdf | and factsheets. |
| Taking Your Samples: A FAQ and Guide for Public Water Systems (ME). Two-page handout containing comprehensive but basic information about what, when and how to sample and follow-up steps if samples are missed. | http://www.maine.gov/dhhs/mecdc/environme ntal- health/water/resources/serviceconnection/docu ments/Vol20-1.pdf (p. 9) | |
| Procedure for Shock Chlorination of Water Systems Using Bedrock Wells Factsheet (ME). Two-page document on how and why to shock chlorinate. | http://maine.gov/dhhs/mecdc/environmental-health/water/resources/wellshockingfactsheet.htm | |

| Small Water Systems: Responding to Loss of Pressure Events Factsheet (ME). One-page factsheet for operators/managers to address loss of pressure events. Contains step-by-step instructions on what do to and who to contact for help. | http://www.maine.gov/dhhs/mecdc/environme ntal- health/water/documents/LossPressureSmallSyst ems.pdf | |
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| Protecting Public Health During UV Disinfection System Failures Factsheet (ME). One-page handout which contains a checklist and follow-up instructions. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/UVSystemFailure.pdf | |
| Drinking Water Chemicals and Additives: Quality Assurance Factsheet (ME). One-page factsheet which describes how drinking water chemicals and additives must be certified to meet NSF/ANSI standard 60-2009: Drinking Water Treatment Chemicals-Health Effects. | http://www.maine.gov/dhhs/mecdc/environme ntal- health/water/resources/serviceconnection/docu ments/vol19-2.pdf (p. 7) | |
| Taking a Total Coliform Bacteria Test Properly Factsheet (ME). One-page handout which contains pictures and step- by-step instructions on how to collect total coliform samples. | http://www.maine.gov/dhhs/mecdc/environme ntal-health/water/resources/documents/how- to-collect-a-water-sample.pdf | |
| Protecting Public Health During Chlorination System Failures <u>Factsheet</u> (ME). One-page factsheet with a checklist. | http://www.maine.gov/dhhs/mecdc/environme ntal- health/water/documents/ChlorinationSystemFail ure.pdf | Prepare short, t factsheets. |
| 12-Month Monitoring Calendar for Non-Community Surface Water Systems (MN). Minnesota Department of Health produced a 2013 calendar specifically for non-community surface water systems that included sampling/monitoring reminders and deadlines, due-dates for forms and paperwork, and state contact information. | Contact Anita Anderson, anita.c.anderson@state.mn.us, or Jerry Smith, gerald.smith@state.mn.us | Prepare short, targeted guides and factsheets. |
| 1.2. Make available frequent training opportunities to | o NCWS personnel to ensure adequate knowledge | |
| Water System Operation Guide (WV). Basic guide to operating a water system. | http://www.wvdhhr.org/oehs/eed/swap/traini ng&certification/documents/1DManualCOMPLE TE.pdf | Distribute basic guides and training manuals for certificences. |
| Public Water System Operator's Training Manual (NE). Training manual provided to all Nebraska Grade V operators and individuals seeking Grade V certification. | Contact Mike Wentink, Mike.Wentink@nebraska.gov | Distribute basic guides and training manuals for certified NCWS operators. |

| "1D" TNCWS Operator Certification (WV). Offers free "1D" operator certification for TNCWSs, and no CEUs are required. Trainings are taught locally and are also available online. | http://www.wvdhhr.org/oehs/eed/swap/traini ng&certification/documents/Water_Operator_ Requirements2012.pdf | Offer free ope certification tr convenient loc |
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| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sys Vendor Training. Work with third-party entities, such as the Cod | | erator training at ocations. |
| "Grade V" TNCWS Operator Certification (NE). All TNCWS operators are required to have a certified operator (Grade V). Grade V exams and licenses are free. | http://dhhs.ne.gov/publichealth/pages/crl rcs water water.aspx | Consider requiring all NCWSs (including TNCWSs) to have a |

| Recommendation 2: Assist NCV | VSs with capacity challenges | |
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| 2.1. Adopt requirements for NCWSs tohelp ensure adequate capacity prior to commencing operations and for the life of the system | | |
| Capacity Development Plan (MI). Permit application/capacity development plan for new NTNCWSs that requires new systems to document their technical, managerial and financial plan. Asks targeted questions regarding the system and its management and provides information on required sampling. Capacity Evaluation (VT). A capacity evaluation for NTNCWSs, specifically schools, that includes recommendations for the school to help address any deficiencies identified. | http://www.michigan.gov/documents/deq/deq -odwma-ehs-ncws-capdevguide 402837 7.pdf http://drinkingwater.vt.gov/pcwscapdev.htm | Encourage NCWSs to submit a capacity development plan with their water system permit application. |
| 2.2. Offer special funding programs to address NCWS needs Very Small System Compliance Loan Fund (ME). Provides 100 percent principal forgiveness (or grant amount) for water treatment improvements required to achieve compliance with a current or future standard of the Safe Drinking Water Act, excluding the Total Coliform Rule. Award amount up to \$50,000 per project. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/2011verysmallsystemcomplianceloanfundapplication.pdf | Offer low interest loans or grants to NCWSs to assist them in meeting regulatory requirements. |
| Preliminary Engineering Report Support (NV). Nevada has a loan program through their DWSRF to help systems develop a preliminary engineering report which is required to receive a DWSRF loan. | http://ndep.nv.gov/bffwp/dwsrf1.htm or Contact Daralyn Dobson, ddobson@ndep.nv.gov | oans or grants requirements |
| State Aid Funds for Schools (NH). The Department of Education in New Hampshire has "state aid" funds to assist schools in building infrastructure, including water treatment. | http://www.gencourt.state.nh.us/rsa/html/XV/ 198/198-15-c.htm http://www.education.nh.gov/program/school approval/school_faq.htm | s to NCWSs to a: |
| Wellhead Protection Grant (ME). Six-page document which describes eligibility criteria for 2012 Wellhead Protection Grant. Application is included. Grant is for projects that clearly reduce the likelihood of contamination occurring in the Wellhead Protection area by existing or future activities. \$5,000 per grant. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/WHPgrantApplication.pdf | ssist them in |

| Water System Consolidation Grant (ME). Three-page document which describes eligibility criteria for grant and includes application. Water systems with a TMF capacity issue can receive partial funding to consolidate with a more viable public water system to enhance system capacity and ensure safe water. The Consolidation Grant will fund no more than 50 percent of the cost of the water system consolidation for for-profit facilities and no more than 75 percent of the cost of the water system consolidation for not-for-profit facilities. Grant awards may not exceed \$100,000. Source Water Protection Grant (Surface Water) (ME). Six-page document that describes eligibility criteria for the 2012 Source Water (Surface Water) Protection Grant and | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/SystemConsolidationApplication.pdf http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/SWPgrantApplication. | Offer low interest loans or grants to NCWSs to assist them in meeting regulatory requirements. |
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| includes application. Grant is for projects that clearly reduce the likelihood of contamination occurring in the Source Water Protection area by existing or future activities. \$5,000 per grant. Sanitary Well Seal Cap Program (ME). Available to all PWSs without a sanitary well seal on their well(s). PWSs without sanitary well seal caps are eligible for reimbursement for up to 75 percent of the cost of the installation (up to \$250 per | http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/SanitarySealWellProgram.pdf | s to assist them in meeting |
| PWS) of a locking sanitary well seal under this program. Land Acquisition Loans (ME). Four-page document that describes eligibility criteria for grant and includes application. Provides low interest loans for the purchase of land and/or conservation easements needed for source water protection. No project limit. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/forms/2011-land-acq-loan-application-form.pdf | Offer low interest loans or grants to assist them in meeting regulat requirements. |
| Capacity Development Grant (ME). Maine offers grants for the preparation of documents that will assist PWSs in the maintenance or enhancement of water quality by identifying possible improvements in systems' technical, managerial and financial operations. Limit: up to 50 percent of the project costs up to a maximum reimbursement of \$10,000. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/financial-resources/financialresources.htm Grant Application: http://www.maine.gov/dhhs/mecdc/environmental-health/water/documents/CDgrantApplication.pdf | Offer low interest loans or grants to NCWSs to assist them in meeting regulatory requirements. |
| List of Available Grants and Loans (ME). Summary list of all funding opportunities for public water systems. Good internal reference document for state staff or for any public water system wanting a guide on all funding opportunities in Maine. | http://www.maine.gov/dhhs/mecdc/environmental-health/water/financial-resources/financialresources.htm | Provide NCWSs with a list of funding opportunities, including eligibilities and application |

| Submittal of Engineering Plans Letter (NV). Four-page notification letter containing instructions for submitting engineering plans to the Bureau of Safe Drinking Water. | http://ndep.nv.gov/bsdw/epr.htm, or contact Jim Balderson, jbalderson@ndep.nv.gov | Provide syst and reports |
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| Public Water System Determinations and Requirements Letter (NV). Two-page notification letter containing regulatory citations and general overview of required documents that must be submitted by a PWS and other technical requirements for the PWS. | Contact Andrea Seifert for information: <u>ASeifert@ndep.nv.gov</u> | stems with instruct s. |
| Standard PWS Reports (UT). Developed standard PWS reports as part of the Improvement Priority System for all water systems. There are five standard reports available to aid in the oversight of water systems. These reports are: 1) the Water System Inventory, 2) Monitoring Schedule, 3) IPS Report [a listing of all violations including physical deficiencies], 4) Annual Bacti Summary, and 5) Certified Operator Status. | Available upon login to http://www.drinkingwater.utah.gov/ | Provide systems with instructions or guides for submitting required plans and reports. |
| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sy be more meaningful and timely so that the customers who ma impact/influence the water system to improve compliance. Put clear. | y consume the water in violation can | equired plans |
| 2.3 Provide information to NCWSs on how to effect | tively utilize contract operators to meet sy | stem |
| responsibilities. | | |
| | Nevada: http://www.leg.state.nv.us/NAC/NAC-445A.html#NAC445ASec6275 (NAC 445A.6275.3. If a person in responsible charge is on call, the person must be able to: (a) Be contacted immediately; and (b) Respond at the site within 4 hours.) | Allow NCWSs to "share" operators from other PWSs, under appropriate conditions. |
| responsibilities. Operator Sharing Program (NE, NV, TX). Allows PWS to "share" certified operators if the there is a "reasonable travel time between work areas" (NE), or availability during an | Nevada: http://www.leg.state.nv.us/NAC/NAC-445A.html#NAC445ASec6275 (NAC 445A.6275.3. If a person in responsible charge is on call, the person must be able to: (a) Be contacted immediately; and (b) Respond at the site within 4 hours.) stem Workgroup also suggests enhancing Contractor operators need to know the NCWS | Allow NCWSs to "share" Provide No operators from other PWSs, under contract o appropriate conditions. |
| Coperator Sharing Program (NE, NV, TX). Allows PWS to "share" certified operators if the there is a "reasonable travel time between work areas" (NE), or availability during an emergency (2 hours-TX, 4 hours-NV). Other Workgroup Suggestions. The Non-Community Water Sy communication between PWS owners and contract operators. requirements, but the legal entity is the owner of the PWS and | Nevada: http://www.leg.state.nv.us/NAC/NAC-445A.html#NAC445ASec6275 (NAC 445A.6275.3. If a person in responsible charge is on call, the person must be able to: (a) Be contacted immediately; and (b) Respond at the site within 4 hours.) stem Workgroup also suggests enhancing Contractor operators need to know the NCWS | Allow NCWSs to "share" Provide No operators from other PWSs, under conditions. |
| Operator Sharing Program (NE, NV, TX). Allows PWS to "share" certified operators if the there is a "reasonable travel time between work areas" (NE), or availability during an emergency (2 hours-TX, 4 hours-NV). Other Workgroup Suggestions. The Non-Community Water Sy communication between PWS owners and contract operators. requirements, but the legal entity is the owner of the PWS and materials. Contract Operators Database (TX). Database of contract | Nevada: http://www.leg.state.nv.us/NAC/NAC-445A.html#NAC445ASec6275 (NAC 445A.6275.3. If a person in responsible charge is on call, the person must be able to: (a) Be contacted immediately; and (b) Respond at the site within 4 hours.) Stem Workgroup also suggests enhancing Contractor operators need to know the NCWS will often receive the education and outreach http://www.tceq.texas.gov/drinkingwater/tech | Allow NCWSs to "share" Provide No operators from other PWSs, under contract o appropriate conditions. |

operator requirements, etc.

Recommendation 3: Implement practices that efficiently and effectively address the needs of NCWSs

3.1 Enhance compliance assistance for NCWSs through coordination and by leveraging the authorities of other agencies

| authorities of other agencies | | |
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| Collaboration with State Regulatory Agencies (OH). Collaborate with other state regulatory agencies to identify establishments that need a water system permit or that are not complying with drinking water requirements. Revocation of a food service permit or liquor license until the problems are corrected. Coordination with Institutional Owners (UT). The state maintains a list of institutional owners (e.g., other state and federal offices that own groups of NCWSs) to facilitate communication between and among the institutional owners and aid in compliance with all division rules. | Contact Christine Brock, Christine.brock@epa.state.oh.us Contact Ken Bousfield, kbousfield@utah.gov | Collaborate with other state regulatory agencies to identify establishments that need a water system permit or to inform systems regarding their drinking water requirements |
| License to Operate (OH). OH requires all NCWSs to have a License to Operate (LTO) separate from operator certification. The license must be displayed in a public area and is color- coded: green indicates that the NCWS meets all standards and yellow indicates the system has violations. Must be renewed each year and can be revoked. Also working with other state agencies to enforce the LTO. | http://epa.ohio.gov/ddagw/enforcement.aspx | Collaborate with other state regulatory agencies to identify establia water system permit or to inform systems regarding their drinkin requirements. |
| Coordination with Local Health Department (MI). Working with the local Health Department on compliance issues related to the Lead and Copper Rule and Public Notification. | Contact Dana DeBruyn, debruynd@michigan.gov | state regulate or to inform s |
| Coordination with Sector-Specific Organizations (MN). Working with the Minnesota Water Quality Association, the primary association in the state for water treatment designers and installers. Also working with Hospitality Northwest and Congress of Resorts to reach resort owners. | Contact Jerry Smith for information, gerald.smith@state.mn.us | ory agencies to ident |
| Coordination with Dept. of Agriculture and Liquor Control Commission (NE). The State of Nebraska works with the Department of Agriculture and Liquor Control Commission (they handle food and liquor dispensing permitting requirements) to enforce drinking water violations and to identify new NCWSs. Partners are primarily utilized when a system has been notified of non-compliance and no actions have been taken by the water system within the first 30 days following notification. | Contact Mike Wentink for information, mike.wentink@nebraska.gov | regulatory agencies to identify establishments that need inform systems regarding their drinking water |

| Coordination with Festival/Fair Licensing Authority (MN). Work with festival/fair licensing authority to ensure that water samples are taken prior to, during, and post event. | Contact Jerry Smith for information, gerald.smith@state.mn.us | |
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| Partnerships with Multiple Agencies (NV, MN). Potential partnerships: School Boards, Department of Health and Human Services, utility mentoring program, NV Association of Counties, MN Congress of Resorts and MN Hospitality Association. | Contact Jerry Smith for information, gerald.smith@state.mn.us | Collaborate with other state regulatory agencies to identify establishments that need a water system permit or to inform systems regarding |
| Food Service Water Letter Template (WV). WV has developed a template food service water letter as a way to notify a NCWS of a violation and help to encourage the water system to rectify the violation. | Contact Dawn Newell for information, <u>Dawn.A.Newell@wv.gov</u> | her state regulate ments that need inform systems |
| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sys Departments of Agriculture and epidemiology agencies to lever requirements. | | ory agencies a water regarding |
| Coordination with New Businesses (NV). Working with new businesses via the Governor's Office of Economic Development during the permitting process in order to educate businesses about their environmental requirements, including drinking water requirements. | http://diversifynevada.com/ | Work with local health departments or disseminate educational materials and |
| Coordination with Restaurant Inspectors (NV). NV Drinking water staff partner with restaurant inspectors in the Health Division, leverage contacts and information to help restaurant owners and managers understand their safe drinking water requirements. | Contact Jennifer Carr, <u>icarr@ndep.nv.gov</u> | health departme cational materia |
| Coordination with Other State Agencies (MN). MN Department of Health (MDH) is copied on all approval letters for new or existing plumbing modifications. The Department of Agriculture notifies the MDH when they are reviewing licenses for new establishments. MDH is also working with building and zoning officials who notify them when there are building expansions or new construction. Provides system with a "new water system packet." | Contact Jerry Smith, gerald.smith@state.mn.us | Work with local health departments or other agencies to disseminate educational materials and provide on-site training |
| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sys communication with the local health department in order to contraining strategy. | | ing. |
| 3.2. Provide technical support to NCWSs either thro | ugh state staff or third-party providers. | |
| Field Personnel (NE). Contract with third-party providers (using 2-percent DWSRF set-aside funds) to provide resources for field representatives who visit systems annually, contact new system owners to inform them of requirements and provide technical assistance. | http://dhhs.ne.gov/publichealth/Documents/CapDevReport.pdf | Utilize DWSRF set- aside funds, fees or other sources to |

| Third-Party Technical Assistance Provider (EPA R8). Working with a third-party technical assistance provider. Helps the region to overcome some of the geographical (widely dispersed) issues associated with NCWSs in Region 8. Automated Phone Calling System (ID). Idaho uses an automated phone calling system to notify system owners when it is time for them to submit monitoring reports to the state. This has resulted in a 48 percent reduction in | Contact Tiffany Mifflin, mifflin.tiffany@epa.gov. http://www.epa.gov/region8/waterops/ Contact Don Lee for information, Don.Lee@deq.idaho.gov | Make use of available technol maintain regular contact with NCWSs. | |
|--|--|--|--|
| monitoring and reporting violations since the phone system was implemented. OTHER WORKGROUP SUGGESTIONS. The Non-Community Water System messaging to notify NCWSs of emergencies, violations, reminder | | Make use of available technology to maintain regular contact with NCWSs. | |
| EPA ORD Technical Assistance. (EPA ORD) EPA ORD can provide technical assistance when requested (e.g., arsenic removal). | Contact Tom Sorg for information, sorg.thomas@epa.gov. arsenic removal issues. | Use EPA's Office of Research and Development (ORD) to provide technical assistance to NCWSs with | |
| Source Water and Treatment Support (MN). MN is working with NCWSs to find higher quality source water, and if that is not possible, they are working with systems to install point-of-entry or point-of-use treatment. | Contact Jerry Smith, gerald.smith@state.mn.us | Utilize in-house st | |
| Support for Schools and Child Care Facilities (EPA R5). Raising awareness in schools and child care facilities regarding the importance of achieving drinking water standards by sending letters to repeat violators, providing Lead and Copper Technical Assistance and generally raising awareness around this issue. | Contact Tom Poy for information, poy.thomas@epa.gov | Utilize in-house staff to provide technical assistance. | |
| Engineering Support (MN). MN provides engineering support to small systems, as does MN Rural Water Association. | http://www.health.state.mn.us/divs/eh/water/factsheet/com/arsenic.html | ical assistan | |
| Sampling Support (ME). The state conducts sampling and/or establishes sampling schedules on behalf of the water system. | Contact Erika Bonenfant, <u>Erika.Bonenfant@maine.gov</u> | ce. | |
| Annual Bacteriological Summary (UT). One-page report showing system-specific information of all the total coliform samples and those that are total coliform or E. coli positive. | Available upon login to http://www.drinkingwater.utah.gov/ | | |

| Coordination with Parent Corporation (UT). The state meets regularly with the parent corporation or association and explains the importance of safe drinking water and the liabilities for failure to provide safe drinking water. Then the state encourages the parent organization to be responsible for each of their water systems. | Contact Ken Bousfield, kbousfield@utah.gov | Utilize in-house staff to provide technical assistance. |
|---|---|---|
| Coordination with Industrial Association, American Society of Civil Engineers, County Building Departments and others (NV). The state conducts outreach to various entities and associations to improve awareness of the drinking water program and requirements, often in the form of presentations or luncheon meetings. | Contact Jennifer Carr, <u>icarr@ndep.nv.gov</u> | |
| 3.3. Prioritize and target assistance to NCWSs throu | igh systematic assessments and evaluation | ns |
| Comprehensive Database (NH). New Hampshire has developed OneStop database that includes information on water systems, water quality conditions and other environmental parameters. The database can be accessed by state staff and the general public. | http://www2.des.state.nh.us/DESOnestop/BasicSearch.aspx | Maintain a list of NCWSs that are having difficulty meeting drinking water requirements and assign staff to provide technical assistance. |
| Water Bureau Priority List (NH). New Hampshire's list includes a record of any actions that have been taken to help the systems rectify deficiencies identified during a sanitary survey. Various lapsed milestones result in different enforcement/technical assistance actions. | http://water.epa.gov/infrastructure/drinkingwater/pws/smallsystems/upload/epa816f12006.pdf(p. 5) http://des.nh.gov/organization/divisions/water/dwgb/capacity/index.htm | |
| Capacity Assessments for Very Small Systems (MS) Mississippi conducts a capacity assessment each year for water systems. | http://msdh.ms.gov/msdhsite/ static/30,0,76,6 2.html | g difficulty meeting dr le technical assistance. |
| OTHER WORKGROUP SUGGESTIONS. The Non-Community Water Sys Tracker Tool to help keep track of and prioritize assistance for re establishing a set of questions about NCWS's TMF capacity to a | non-community water systems, as well as | lrinking water e. |