TRIENNIAL ASSESSMENTS

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Virginia’s Triennial Assessment is:

A basic evaluation of the Technical, Managerial, and Financial (TMF) capacity of regulated community and NTNC water systems in Virginia.

Coordinated by Capacity Development staff and conducted by Field Office staff every 3 years.

Consisting of 18 questions.
Required under SDWA:

As part of its Capacity Development Strategy (which is required for EPA funding) the State is required to:

“establish a baseline and measure improvements in capacity with respect to national primary drinking water regulations and State drinking water law.” SDWA §1420 (c) (D)
Basic process for evaluation:

- All Community and NTNC water systems are evaluated
- 6 Field Offices use a simple Excel Spreadsheet
- Last evaluation period covered January 2020 - December 2022
- 18 Questions divided into 6 each of Technical, Managerial, and Financial
Basic process for evaluation:

• Drop-down Yes/No answers

• Several questions have pre-populated answers from SDWIS or other data sources.

• The 18 Questions are now included in the Sanitary Survey questionnaires.
Why Excel?

Provides specific guidance for each question in the survey
Keeping it simple:

“Jump Box” hyperlinks to question-specific instructions
Measuring the Water Systems’ TMF capacity.

If in doubt
the answer is NO
## Technical Questions

<table>
<thead>
<tr>
<th>Question #</th>
<th>Question Text</th>
<th>Guidance to obtain a &quot;Yes&quot; or &quot;No&quot; response</th>
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</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Question 1 Is the waterworks score on the Jan 2023 ETT ≤ 10?</td>
<td>This will be pre-filled using the most current ETT report. This ETT list is the most current one and covers the period ending September 30, 2022.</td>
<td>Pre-filled (which is why it is grayed out)</td>
</tr>
<tr>
<td>2</td>
<td>Question 2 Does the waterworks have sufficient operator coverage for sick leave and vacation?</td>
<td>The waterworks must have coverage to ensure Waterworks Regulations attendance requirements when their operator is not available. A &quot;Yes&quot; is for waterworks that have sufficient coverage. This can include having additional persons on staff, by using a contract-operations company that guarantees coverage, or by having a contract or MOU with a licensed operator to cover such events. If there is no reliable backup operator, the answer will be &quot;No&quot;. Note that if it is determined that they do not have sufficient coverage, an NOAV may be needed.</td>
<td>* SWIFT Survey or contact the waterworks directly.</td>
</tr>
<tr>
<td>3</td>
<td>Question 3 Has the waterworks either not received significant deficiencies, or completed timely correction of all significant deficiencies?</td>
<td>A &quot;Yes&quot; is for waterworks that have either not received significant deficiencies OR they have met the Corrective Action Plan timelines for any significant deficiencies received. A &quot;No&quot; is for waterworks that have unresolved significant deficiencies or they have missed deadlines for an open CAP.</td>
<td>*SWIFT Survey, SDWIS, paper Sanitary Survey, CAP</td>
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</table>
# Technical Questions

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| 4          | Question 4
  Did the waterworks address recommendations from recent sanitary surveys? | A "Yes" is for waterworks where the owner has corrected issues from sanitary survey recommendations such that the waterworks is operated reliably. A "No" is for waterworks that have carry-over recommendations from prior sanitary surveys indicating a lack of commitment to maintenance and improvement of the waterworks. | Review the last two sanitary surveys (including *SWIFT surveys). If unable to determine answer, contact the waterworks directly. |
| 5          | Question 5
  Does the waterworks have a written policy for responding to customer complaint policy? | "Yes" is only for those waterworks with a **written** customer complaint policy. "No" is for all others, including those with a customer complaint procedure that is not written. | *SWIFT Survey or contact the waterworks directly. |
| 6          | Question 6
  Are all plans and reports up to date and implemented (eg. BSSP, LCR Plan, CCCP, CCR, WBOP, Sampling, etc.)? | To be a "Yes", all of the plans and reports required under the Virginia Waterworks Regulations must be up-to-date and correctly implemented. If any of these reports or plans is out-of-date or delinquent, the answer is "No". This includes the Emergency Plan for Extended Power Outages. Note, if this is "No" than an NOAV may be needed. | *SWIFT Survey, SDWIS, MOR, Sanitary Survey, NOAVs |
Managerial Questions

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| 7          | Question 7  
Did the waterworks consistently operate within 80% of its permitted capacity in the last 3 years? | For this to be "Yes", the waterworks must demonstrate that it is consistently operating within 80% of its operating capacity. A water system must not bounce up then down around this threshold. For grandfathered systems with a specific connection design capacity, they must not exceed the permitted number of connections. This will be "No" if the waterworks is not consistently submitting MORs or if they appear to be seasonally exceeding the operating capacity. Note that if this is "No" the waterworks must be on the path to resolving the issue or an NOAV may be needed. | *SWIFT Survey, MORs, NOAVs, Sanitary Surveys    |
| 8          | Question 8  
Does the system meet Waterworks Regulations design and construction standards? | "Yes" is for systems that have been constructed using approved plans and specifications and have not been modified without a construction permit or grandfathered systems without unpermitted improvements, that are operationally satisfactory. | *SWIFT Surveys, Permits, NOAVs, paper sanitary Surveys |
| 9          | Question 9  
Are the waterworks facilities and appurtenances in good operating condition? | "Yes" is for systems with source, treatment, storage, and distribution in operating condition without defect. Issues which would trigger a "No" answer to this question include, but are not limited to, indications of: water hammer, lack of maintenance, failed components, repeated bacti problems, tanks with multiple patch welds, spalling of concrete that is affecting the competence of the facility, etc. | *SWIFT Survey, paper sanitary Survey, MORs, NOAVs |
Managerial Questions

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<td>10</td>
<td>Question 10 Are all service connections metered and is there a water accountability program in place?</td>
<td>In order to answer &quot;Yes&quot; all service connections must be metered, they must be reading the meters on a regular basis, AND they must be keeping track of water accountability in the system. For a waterworks that has distribution system meters that they don't read, or only have a discharge master meter, the answer is &quot;No&quot;.</td>
<td>*SWIFT Survey, paper sanitary survey, MORs</td>
</tr>
<tr>
<td>11</td>
<td>Question 11 Does the waterworks meet all established National Primary Drinking Water Standards?</td>
<td>&quot;Yes&quot; is only for those systems that have no unresolved PMCL violations. If a waterworks has an open PMCL violation, the answer is &quot;No&quot;.</td>
<td>NOVs, *SWIFT Survey</td>
</tr>
<tr>
<td>12</td>
<td>Question 12 Have all operators attended a technical training seminar or conference each year covered by this survey?</td>
<td>&quot;Yes&quot; is if the waterworks operators got training annually, not just at the end of the required 2-year continuing education cycle. If the operator(s) did not attend training each year, the answer is &quot;No&quot;.</td>
<td>*SWIFT Survey or contact the waterworks directly.</td>
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<tr>
<td>13</td>
<td>Question 13                      Did the waterworks pay the technical assistance fee?</td>
<td>This will be pre-filled using the most current technical assistance fee data.</td>
<td>Pre-filled (which is why it is grayed out)</td>
</tr>
<tr>
<td>14</td>
<td>Question 14                      Does the waterworks have at least 45 days cash on-hand to cover expenses?</td>
<td>This is &quot;Yes&quot; if the waterworks has enough cash on-hand to cover a month and a half of operating expenses. The waterworks MUST know how much 45 days of operations/expenses would cost AND have that money available. If the waterworks doesn't know how much 45 days of operations/expenses would cost or they don't have that much on-hand, the answer is &quot;No.&quot;</td>
<td>*SWIFT Survey or contact the waterworks directly. Refer to the waterworks WBOP if is from within the past 3 years.</td>
</tr>
<tr>
<td>15</td>
<td>Question 15                      Is the waterworks budget independent from subsidization by general funds, sewer funds or other funding sources?</td>
<td>This is &quot;Yes&quot; if the waterworks pays all of its expenses out of the revenue from billed water usage and fees. If a waterwork regularly gets money from outside of the water utility (i.e. general fund transfers, short term loans from the owner, etc.) in order to cover its expenses, the answer is &quot;No&quot;.</td>
<td>*SWIFT Survey or contact the waterworks directly.</td>
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### Financial Questions

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<td>16</td>
<td>Question 16</td>
<td>This is &quot;Yes&quot; if they have a written Capital Improvement Plan. No other plan is a substitute. If they do not have a written CIP but have money set aside for &quot;capital improvements&quot; the answer will be &quot;No.&quot;</td>
<td>*SWIFT Survey or contact the waterworks directly.</td>
</tr>
<tr>
<td>17</td>
<td>Question 17</td>
<td>The waterworks has adjusted their rates between 2020 - 2022. If a waterworks does not directly bill for water (i.e. apartment complexes, mobile home parks, nursing homes, etc.) then there should be a rental or fee adjustment within the past 3 years to ensure coverage of water related expenses. If rate adjustments have not been made within the past 3 years, the answer is &quot;No.&quot;</td>
<td>*SWIFT Survey or contact the waterworks directly.</td>
</tr>
<tr>
<td>18</td>
<td>Question 18</td>
<td>This is &quot;Yes&quot; if the waterworks has a current Asset Management Plan (no other plan is substitute). If they only have a CIP or their AMP is more than 3 years old, the answer is &quot;No&quot;.</td>
<td>Pre-filled with AMPs required since 2020 under DWSRF Funding; *SWIFT Surveys or contact the waterworks directly.</td>
</tr>
</tbody>
</table>
### Management and Operation

Does the system meet Waterworks Regulations design and construction standards? (unpermitted construction or modification) (triennial assessment)

<table>
<thead>
<tr>
<th>SURVEY_ID</th>
<th>PWSID</th>
<th>PWS_NAME</th>
<th>HasIssue</th>
<th>ComponentLongText</th>
<th>ComponentShortText</th>
<th>Severity</th>
<th>Answer</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>642</td>
<td>VA1063269</td>
<td>GREAT OAKS COUNTRY CLUB</td>
<td>TRUE</td>
<td>Customer complaint policy</td>
<td>Does the waterworks have a written policy for responding to customer complaints? (triennial)</td>
<td></td>
<td>REC</td>
<td>We recommend developing your procedure for responding to water system complaints into a written policy.</td>
</tr>
<tr>
<td>699</td>
<td>VA1063720</td>
<td>NETWORK CHURCH AT SPIRIT WIND RETREAT</td>
<td>TRUE</td>
<td>Inspection comments</td>
<td>Did the waterworks address recommendations from recent sanitary surveys? (triennial assessment)</td>
<td></td>
<td></td>
<td>We observed during the inspection that recommendations from the previous inspection were not addressed. These include keeping record of annual cross connection inspections and submitting monthly operation reports.</td>
</tr>
<tr>
<td>600</td>
<td>VA3800694</td>
<td>PRUDEN CENTER FOR INDUSTRY &amp; TECHNOLOGY</td>
<td>FALSE</td>
<td>Asset Management Plan</td>
<td>Does the waterworks have a written Asset Management Plan? (triennial assessment)</td>
<td></td>
<td>REC</td>
<td>The waterworks does not have an Asset Management Plan.</td>
</tr>
</tbody>
</table>
Capacity Development Staff Information Use:

Scores under the “natural” break, typically 9 points:

- Water systems are contacted to confirm answers
- Offered technical assistance to improve sustainability
- Offered resources for management/operator training
- Systems requesting assistance provided in depth assessment
  - Waterworks Business Operation Plan
  - Water System In-depth Assessment (Virginia Tech Model)
Assessments:

**Distribution of 2016 Triennial Assessment Scores**

- Scores range from 0 to 300.
- The x-axis represents the score, and the y-axis represents the count.
- The chart shows the distribution of scores with peaks at certain score points.
Assessments:

Distribution of 2020 Triennial Assessment Scores
Assessments:

Distribution of 2023 Triennial Assessment Scores
Non-sustainable Systems:

2016 99

2020 85 - ODW requested a one-year delay from EPA to better coincide with the Governor’s Triennial Report

2023 70

In the last ten years, ODW has documented a reduction in non-sustainable systems of nearly 30%
Excerpt from 2020 Report

“During the reporting period, VDH conducted a required triennial assessment. In early 2020, VDH assessed all community and NTNC waterworks in Virginia. The assessment consisted of 18 “yes” or “no” questions. The questions related to the three TMF capacities. VDH staff used official records to answer questions and directly contacted waterworks for additional information as needed. Staff compared results of this assessment to the baseline assessment conducted in 2016.”
Questions?