Streamlining and Leaning Public Water System Screening Form Changes as a Result of May 1, 2018 Workshop

Vicky Carrier, P.E., R.S., M.B.A.
Sanitary Engineer 3
Drinking Water Section
CT DPH Drinking Water Section

- Regulate approx. 2,470 Public Water Systems with over 4,000 sources

- Provide Public Drinking Water to 2.9 million CT residents served
  - 90 systems serve over 1,000 people
  - 420 systems serve under 1,000 people - small community systems
  - 2,000 non-community systems

- DPH Staff of 50 people in several units:
  - Technical Review and Field Assessment
  - Safe Drinking Water Rule Implementation
  - Enforcement
  - Capacity (includes TNC PWS)
  - Source Assessment/Protection
  - Grants and Administration
  - Drinking Water State Revolving Loan Fund Program
Presentation Outline

- What is a PWS Screening Form?
- Which DWS Staff reviews them?
- Summary of Changes to Form as a result of May 1, 2018 workshop
- “Public Water System” Definition
- PWS Screening Form Details
- CPCN, Discovery or Reactivation
- How the WUCC’s fit in
- EPA Examples (not public)
- Where to find PWS Screening Form
What is Public Water System Screening Form?

- This form is used to determine if a proposed project or a change in operation at an existing facility will result in the creation of a new water company or public water system or change the status of an existing public water system.
- First step for creating a new system under CPCN or evaluating an existing facility that is expanding, has had a key tenant (example: childcare business moves out of a church or a plaza) move out or other change in use that may impact PWS status.
- Local Health is typically who requests that the form be filled out and submitted to DWS.
- Sometimes another activity (eg. septic repair or a complaint) leads Local Health to ask for PWS Screening Form.
Who Currently Reviews PWS Screening Forms

- Vicky Carrier for water systems anticipated to be classified as Community (residential) or Non-Transient Non-Community Public Water Systems (schools, daycares, offices or plazas with more than 25 employees).
- Pam Scully for water systems anticipated to be classified as Transient Non-Community Public Water Systems (restaurants, campgrounds, churches)
- Please Submit Completed Forms and all Supporting Documents to:
  DWDCompliance@ct.gov
  or
  Department of Public Health
  Drinking Water Section
  410 Capitol Avenue, MS#12 DWS
  P.O. Box 340308
  Hartford, CT 06134-0308
Brief Summary of Changes

- Took out “Building Capacity”
- Added “Change of Ownership” - will trigger “PWS Responsibilities Letter” letter to new owner
- Changed order of “Facility Information”
- Expanded area for project description
- Added a question about treatment
- Now Modeled on Well Permit Exception Form - eg. local health sign off (based on feedback on May 1, 2018)
New PWS Screening Form

- Instructions to be finalized in the near future
Public Water Systems

- CURRENT: "Public water system" or "system" means any water company supplying water to 15 or more consumers or 25 or more persons, based on the "Design Population" as defined in section 16-262m-8(a)(3) of the Regulations of Connecticut State Agencies, jointly administered by the department and the Public Utilities Regulatory Authority, daily at least 60 days of the year.

- PROPOSED IN RTCR REVISIONS: Minor Revisions being proposed in RTCR regulation package.
Does it hit the magic number of 25?

- Community – Strictly based on design population
- Non-Transient Non-Community- typically based on what applicant reports for number of employees/students etc. Childcare facilities are based on licensed capacity plus number of employees
- Transient Non-Community- sometimes trickier but based on what the applicant reports. Useful information would be the number of seats for a restaurant, number of sites for a campground etc.
Screening Form
Facility Information

• Will or does the facility supply water for domestic use to its customers, visitors, and/or members?
  – Domestic use is considered public restrooms, handwashing, sinks, drinking fountains, etc.

• Will or do at least 25 persons (including employees, customers, parishioners, visitors, etc. but not necessarily the same persons) visit the facilities, businesses supplied by the water system daily at least 60 days out of the year?
Screening Form
Facility Information

Number of **same** persons that will or do regularly use the facility on a daily basis for at least six months a year.

- Non-Residential
- Employees
  - Full and Part Time Staff
  - Seasonal
  - Drivers
  - Include all Shifts per Day
- Students
- Contracted Employees
Screening Form
Facility Information

Number of persons whose primary residence is or will be supplied by the facility based on design population.

- **Not** based on actual population living there at this moment
- Population is based by **design criteria** (detailed in the instructions) RCSA § 16-262m-8(a)(3)
- Calculate how many people served by the number of bedrooms and number of apartments or houses
### Screening Form Facility Information

<table>
<thead>
<tr>
<th>Type of service</th>
<th>Design Population Per Service Connection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single family dwelling (Over 3 bedrooms add 1 person per additional bedroom)</td>
<td>4</td>
</tr>
<tr>
<td>Multi-dwelling (i.e. apartments, elderly housing, duplexes, townhouses and residential condominiums)</td>
<td></td>
</tr>
<tr>
<td>One bedroom unit</td>
<td>2</td>
</tr>
<tr>
<td>Two bedroom unit</td>
<td>3</td>
</tr>
<tr>
<td>Three bedroom unit (over 3 bedrooms add 1 person per additional bedroom)</td>
<td>4</td>
</tr>
<tr>
<td>Mobile Homes or Trailers</td>
<td>2.5</td>
</tr>
<tr>
<td>Convalescent Homes</td>
<td>Use Number of Beds</td>
</tr>
<tr>
<td>All other components described in 16-262m-1 (a)</td>
<td>Use Estimated Population</td>
</tr>
</tbody>
</table>

*Drinking Water Section*
Public Water System Screening Form

- In order to determine if the proposed project may result in the creation of a new water company, a “PWS Screening Form" form must be completed and submitted to this office. The information provided by completing the form will be used by the Drinking Water Section (DWS) to evaluate the proposed project and determine whether or not a new PWS will be created.

- Submission of this application form is a prerequisite to the Certificate of Public Convenience and Necessity (CPCN) Phase I-A application.

- The Public Water System (PWS) screening form is available on our website:
  - [www.ct.gov/dph/publicdrinkingwater](http://www.ct.gov/dph/publicdrinkingwater)
Is it a Certificate Project (CPCN), a Discovery, or a Reactivation?
Proposed Development

- **Development of a New Water Company**
  - If you are developing property that will have an on-site water system, you may be creating a water company. Water companies include various types of facilities served by a common source(s) of supply (i.e. well). These include, but are not limited to:
    - residential communities
    - professional offices
    - various businesses
    - schools
    - day care facilities
    - youth camps
    - food service establishments
    - campgrounds

Drinking Water Section
Certificate Projects

- If you are planning a development with an on-site water system having 15 or more service connections or serving 25 or more people, you must obtain a CPCN for the proposed PWS before any construction of the system can begin.
- Now includes “Conversions”
STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Real Fink, M.D., M.P.H.,
Commissioner

February 11, 2016

Jennifer Monroe,
Morgan Academy North Campus
900 Converse Drive, Suite 203
Bristol, CT 06010

Public Works 3rd Floor
450 Clapboard Ridge Road
New Britain, CT 06051

Project Location: Morgan Academy North Campus

Data of Permit Submittal: (3/1/2018)

The Department has received information that the property at 19 Todd Hill Rd, Bristol, CT is planning development of a new water system having a 15 acre service area and serving 15 people/year. The Department requires a property owner to obtain a Certificate of Public Convenience and Necessity (CPCN) for the proposed Public Water System (PWS) before any construction of the system begins.

In order to determine if the proposed project can proceed with the issuance of a necessary permit, a general permit application must be completed and submitted to this office. The CPCN process is required for the issuance of the proposed PWS for development of new water systems in the State of Connecticut. The applicant must provide a Certificate of Public Convenience and Necessity. The Certificate of Public Convenience and Necessity must be signed by the applicant and the Connecticut Department of Public Health (CT DPH). The Certificate of Public Convenience and Necessity must be submitted to the following local health department:

- Water/Waste Water Division
- Office of Environmental Health
- Office of Public Health Services
- Office of Children’s Environmental Health
- Office of Environmental Health

The CPCN application form is available online at CT DPH’s Drinking Water Section website at:

If you have any questions, please contact the following:

Sharon Weber, M.A.
Deputy Director
DPH Drinking Water Section
Office of Environmental Health
Hartford, CT 06106

(860) 509-7234 • Fax: (860) 509-7226
100 Capital Avenue, P.O. Box 54600, M01 DDSW
Hartford, Connecticut 06116-0001

Drinking Water Section
STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

July 16, 2013

Michael Tobin,
Senior Commissioner
101 West River Rd
Southbury, CT 06489

SUDDEN WATER SYSTEM: 901-905 South River Rd
Southbury, CT 06489

CLASSIFICATION TYPE: Public Water System
Project #: 2018-08

Dear Mr. Tobin,

The Department of Public Health Drinking Water Section (DWSS) is in receipt of a Public Water System Notice of Noncompliance (Watershed Area) submission for the Southbury Water System (SUDDEN WATER SYSTEM: 901-905 South River Rd, Southbury, CT 06489). An estimated number of up to 5 people at the time of the violation are at risk of exposure to a contaminant.

The DWSS has determined that the Water System has failed to meet the requirements of Article 11 of the CT Drinking Water Rules for the treatment of this water supply and that a public water system is not in compliance with the requirements of the CT Department of Public Health Drinking Water Section rules. In addition, the Water System is not in compliance with the requirements of the CT Department of Public Health Drinking Water Section rules.

In order to comply with the conditions of the Notice of Noncompliance, the Water System must take immediate action to ensure the safety of the water supply. The following conditions must be met:

1. The Water System must test the water supply for the contaminant identified in the Notice of Noncompliance.
2. The Water System must take corrective action to address the contaminant identified in the Notice of Noncompliance.
3. The Water System must provide a water quality report to all consumers within 60 days of receipt of the Notice of Noncompliance.
4. The Water System must conduct a comprehensive assessment of the Water System to identify any additional sources of contamination.

Failure to comply with these conditions may result in enforcement actions, including fines and penalties.

Dated:

[Signature]
[Name]
[Title]

Drinking Water Section
Public Act No. 16-197

- Please note effective October 1, 2016, an act concerning DPH’s recommendations on the expansion and construction of water systems changed the CPCN process to exclude PURA from the majority of the review.

  - Certificate forms are available on the website

  - Be sure to use Correct Forms!
    * Community vs. Non-Community
Certificate Project Steps

- General Application Form

- New Siting of Well (Location) – Phase 1A
  - Requires Project Approval from DPH

- Well Use (Water Quantity & Quality) – Phase 1B
  - Requires Project Approval from DPH
  - Water Quality Testing
  - Yield Test

- Construction of Water System – Phase 2
  - Requires Project Approval from DPH
  - ex. Tanks, Treatment, etc.
Local Health Department

• The PWS Applicant must bring the Phase 1A approval from the State DPH to obtain a well drilling permit from Local Health Department.

• Please help remind PWS applicants that additional steps are required before they can use the well to serve the public:
  - Phase 1B
  - Phase 2
  - Final Certificate and Well Use Approval

* Many times Applicants don’t come back to DPH until everything is constructed and ready to open.
New Community Systems

Typically, when a community development occurs that is physically disconnected or remote from an existing water distribution system, the supply system must be designed and constructed to meet minimum design standards and acceptable to DPH and the ESA provider, who takes the system over as the legal owner and/or operator.
WUCC

‘WUCC’ is an acronym for ‘Water Utility Coordinating Committee’.

WUCCs were created by statute in 1985 (Public Act 85-535, “An Act Concerning a Connecticut Plan for Public Water Supply Coordination”). They are intended to “maximize efficient and effective development of the state’s public water supply systems and to promote public health, safety and welfare.” WUCC members are PWS and Councils of Government. WUCCs are split into management areas.

There are three WUCCs in Connecticut: Western, Central Corridor, and Eastern. Link is here:
https://portal.ct.gov/DPH/Drinking-Water/WUCC/Water-Utility-Coordinating-Committee
Unclassified Facility Currently in Operation

Discovery of an existing **active** PWS
- Onsite Well
- Meets definition of PWS
- Currently in Operation
- Examples - Gas Stations, Restaurants, Daycares, Medical Facilities, Offices, Plazas, etc

*A facility using bottled water does not stop the water system from having PWS Responsibilities*

DPH will send PWS Responsibilities Letter and begin regulating.

Drinking Water Section
Example Correspondence
“PWS Responsibilities Letter”

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.
Commissioner

Drinking Water Section

August 10, 2018

Ms. Donna Olson
Dear Cushing LLC
7 Elm Street
Norton, MA 02766

PUBLIC WATER SYSTEM: Deer Run Apartments
CLASSIFICATION: Community
PW#ID: CT069921

SUBJECT: COMMUNITY WATER SYSTEM RESPONSIBILITIES

Dear Ms. Olson:

The Department of Public Health (DPH) Drinking Water Section (DWS) has been informed that Deer Run Apartments is supplied by an on-site water system. Deer Run Apartments has been classified as a Community public water system since the water system supplies water for human consumption to 25 or more residents on a regular basis. The owner of the water system is responsible for maintaining compliance with applicable sections of the Code of Federal Regulations, the Connecticut General Statutes and the Regulations of Connecticut State Agencies (RCSCA).Copies of the regulations pertaining to requirements of a PWS are available on the DWS website. A summary of some of these requirements is provided below:

Water Quality Monitoring and Reporting

The attached Water Quality Monitoring Schedule summarizes the routine water quality monitoring requirements for Deer Run Apartments. Water Quality Monitoring Schedules are updated on a monthly basis and are posted on the DWS website. Please note that RCSCA Section 18-15-4B03(c)(3)(d)(ii) states that: “Water samples shall be collected by technical personnel employed by an environmental laboratory approved by the department under section 27-40 of the Connecticut General Statutes, or a certified distribution system operator, or a certified treatment plant operator, or a sanitarian, or an employee of the department, or a person under the direct supervision of either a certified laboratory, a certified distribution system operator or a certified treatment plant operator.”

Water quality analytical results must be reported to the DWS via Electronic Data Interchange (EDI). Additional information regarding the EDI program and a list of laboratories providing EDI services are available on the DWS website.

Sampling Site Plan

Phone: (800) 398-7729 • Fax: (800) 398-7729
Telecommunications Relay Service 7-1-1
410 Capital Avenue, P.O. Box 50200, MS413DWS
Hartford, Connecticut 06120-0018
www.ct.gov/ph/publichealth
Affirmative Action/Equal Opportunity Employer
PWS Classification Review

- Reactivation of a former PWS
  - New Owner or Tenant

- Inactivation of a PWS
  - Interconnection
  - Out of Business

- Change in Classification for a PWS
  - ex. NTNC to TNC (daycare moves out of plaza)

DPH will send Inactivation or Responsibilities (Welcome) Letter
Screening Form
Description of Project

- Attach additional pages if necessary
- Provide more information
  - List number of bedrooms and number of apartments or houses
  - List all businesses supplied by the well
    - Plazas, Strip Malls, multiple buildings served by the well
  - List all employees per shift per day
  - List daycare licensing capacity plus number of employees
  - List if facility is open on weekdays or weekends
EPA Confirmed Not Public

• A bakery that is served by a well, has 5 employees, no public restrooms, they do not serve coffee, etc. The business bakes bread, which it then distributes to the public. We do not know how many loaves of bread are sold each day and how many days out of the year.

• A company that is served by a well, makes flavorings for soda has 4 employees, no public restrooms, etc. It sells the flavorings to other companies for use in their products. We do not know if the flavorings are sold to 25 or more people, etc.

• A brewery that is served by a well, has 6 employees, no public restrooms, they do not serve coffee, etc. The business makes beer, which it then distributes to the public. We do not know how many bottles of beer are sold each day and how many days out of the year.
How to Find Screening Form

Welcome to the Drinking Water Section

Information for Public Water Systems
Consumer Information
Contact Us

Resources
- Drinking Water Security and Emergency Response
- Drinking Water State Revolving Loan Fund
- Operator Certification
- Reservoir Data
- Source Water Protection

Featured Links
- Connecticut Source Water Collaborative
- Connecticut Water Planning Council
- Drinking Water Freedom of Information Act
- Fee Study
- Harmful Algal Blooms (HABs)
How to find Screening Form

- Certificate of Public Convenience and Necessity (CPCN)
- Certification of Completed Water or Treatment Works Construction/Installation
- Certification Form for Consumer Notification of Lead Tap Monitoring
- Chemical Feed System Project Application
- Chlorine - Application for 4 Log Inactivation of Viruses of a Groundwater Source Using Chlorine
- Contact Update Form
- General Application
- Filter Backwash Recycling Rule
- Notification Form to Confirm Compliance with Sections 19-13-B46; 19-13-B102 of the Regulations of Connecticut State Agencies (RCSA)
- Operator Verification
- Operator Contact Update
- Public Notification
- Public Water System Screening Form
- Sampling Site Plan
- Sale of Excess Water Permit
- School Water System Project Evaluation
- Source Abandonment
How to Find Screening Form

Keep the monthly treatment, monitoring, and reporting forms separate from the rest of the forms. In other words, separate emails.

3. At this time do not attach more than eight (8) forms per email.
4. Name your forms clearly and uniquely.
5. Data on these forms will be manually data entered so you will not receive a processed receipt. You will receive an acknowledgement that a form was received. If there are any errors on the form you will be notified.
6. Do not mix forms and edit text files in the same email.

Public Water System Screening Form

This form is used to determine if a proposed project or a change in operation at an existing facility will result in the creation of a new water company or public water system or change the status of an existing public water system.

- Public Water System Screening Form | Adobe PDF | Microsoft Word | Instructions

Source Abandonment Permit Application

This application is for a permit under Section 25-33k of the Connecticut General Statutes for a water company to abandon any existing or future source of water supply. The applicant must provide the department with sufficient information to verify that the source will not be needed for present or future water supply. In accordance with the water company's water supply plan, if approved, you will...
Questions?
Contact Information

- Main Drinking Water Section Phone Number:
  860-509-7333
  860-509-8000 (After Hours)
- Vicky Carrier
  Vicky.carrier@ct.gov
  Cell: 860-422-0988
- Pam Scully
  Pamela.scully@ct.gov
  Phone: 860-509-7334

(Some slides provided by Carissa Madonna, Sanitary Engineer 3, Drinking Water Section)
Thank You!