

# The Idaho Drinking Water Newsletter

Department of Environmental Quality Idaho Drinking Water Program

[www.deq.idaho.gov/water/prog\\_issues.cfm](http://www.deq.idaho.gov/water/prog_issues.cfm)

October 2007, Number 45

*Deadline for filing - December 31, 2007*

## Time to renew SOC/VOC monitoring waivers for 2008-2010

Public water systems are responsible for conducting the monitoring of their drinking water to ensure that it meets all drinking water standards. DEQ may grant monitoring waivers, however, allowing a system to forgo certain sampling during a three-year monitoring period if a system meet specific conditions.

The objective of DEQ's monitoring waiver program is to reduce monitoring and laboratory costs for systems, while at the same time assuring the safety of public water supplies. But monitoring waivers require periodic renewal and are not automatically granted.

DEQ is now accepting requests for monitoring waivers for SOCs (synthetic organic chemicals) and VOCs (volatile organic chemicals). To renew a waiver (or to obtain a new waiver) requires a four-step process:

- 1. Review your current Monitoring Reduction Questionnaire.** Review your last approved "Monitoring Reduction Questionnaire" and then submit in writing either: (a) a statement that there have been no changes to your system since the last questionnaire was filled out, or (b) make necessary changes to the form and submit a copy to DEQ. (If you are seeking a waiver for the first time, you must complete a Monitoring Reduction Questionnaire as well as the two documents below.)
- 2. Complete a Monitoring Waiver Application.** Complete and submit this form, which calls for the name of each sampling point or source.
- 3. Complete a Monitoring Waiver Agreement.** Review the waiver agreement, check the appropriate paragraphs, have the "authorized agent" for your system sign the document.
- 4. Return all three documents to DEQ.** Mail the three documents listed above to your local DEQ regional office or district health department by December 31, 2007. (In the case of the Monitoring Reduction Questionnaire, either mail your updated form or insert a brief note stating, "System made no changes.")

(Note: The three documents referenced above are available at DEQ's web site at [http://www.deq.idaho.gov/water/permits\\_forms/forms/drinking\\_water/forms.cfm](http://www.deq.idaho.gov/water/permits_forms/forms/drinking_water/forms.cfm).)

Monitoring waivers save you time and money. Remember - DEQ must receive your application *no later than December 31, 2007*, to be considered for the 2008-2010 monitoring period. If you have questions, please contact your regional DEQ office or local district health department. ■

## IBOL reminds operators of education requirements

*Water/wastewater operators/backflow assembly testers*

The Idaho Bureau of Occupational Licenses (IBOL) reminds licensed drinking water and wastewater operators and licensed backflow assembly testers of the following education requirements:

- **Each licensed operator** must successfully complete a minimum of six (6) hours (0.6 CEUs) of approved Continuing Education Units (CEUs) annually for license renewal.
- **Backflow Assembly Testers** must complete an eight (8) hour refresher course every two (2) years for license renewal.

### Operators with one or more licenses

- **An operator holding one (1) or more drinking water license(s)** shall be required to meet the annual continuing education requirement for only one license.
- **An operator holding both drinking water and wastewater class licenses** must complete a minimum of six (6) hours annually for the drinking water license *plus* six (6) hours annually for the wastewater license.

As always, continuing education units must be relevant to the field in which the license is issued. If you have questions, please contact IBOL at 208-334-3233. ■

# A Drinking Water Sanitary Surveys 101 for Idaho PWSs

## Plus preparing for a upcoming inspection

Is it time for your system's next sanitary survey? If so, there are some steps you can take ahead of time to prepare for the scheduled survey to make the process go much faster and smoother. First, however, a brief review of the sanitary survey process.

### Definition and purpose of a sanitary survey

A sanitary survey is defined as a routine on-site inspection of the entire water system, including the water source, facilities, equipment, operation, and maintenance. The purpose of a sanitary survey is to protect public health by identifying system deficiencies and recommending possible solutions.

The inspections are conducted by a DEQ staff member or a representative of the local district health department. (DEQ contracts with Idaho's seven district health departments to assist the state in providing service to small public water systems.)

### Frequency of sanitary surveys

The *Idaho Rules for Public Water Systems* require DEQ to conduct a system sanitary survey every three or five years depending on the type of water system. All community surface water and GWUDI (Ground Water Under the Direct Influence) systems must have a sanitary survey inspection every three years. Non-community systems (e.g., schools, hospitals, motels) must be surveyed every five years.

For community water systems determined by the state to have an outstanding performance record, DEQ can decide to conduct sanitary surveys on an every five-year basis.

### The nine components of Idaho's sanitary survey

Idaho's sanitary survey is based on the state's "Public Water System Enhanced Sanitary Survey" (ESS) form. The form is divided into nine areas of concern to be addressed during the sanitary survey inspection of a water system:

- |                         |                          |
|-------------------------|--------------------------|
| 1. General Information  | 6. Pumping               |
| 2. Groundwater Source   | 7. Financial Capacity    |
| 3. Storage              | 8. Managerial Capacity   |
| 4. Hydropneumatic Tanks | 9. Treatment Application |
| 5. Distribution         |                          |

### Steps to take to prepare for a sanitary survey

- Review your last sanitary survey report, which will help you to prepare for your upcoming inspection.
- Review past deficiencies (see your last sanitary survey) and be sure that they have been properly addressed.
- Have a map of your distribution system available.
- Have the following records ready for review:
  - monthly operational reports,
  - equipment calibration dates,
  - daily logs of laboratory test results,
  - as-built drawings of the water system,
  - your flushing and valve exercise programs, and the system's cross connection control program.
- Have the license number for each licensed operator available for review.
- Review the full sanitary survey form on DEQ's web site.

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You can review the complete copy of the “State of Idaho Public Water System Enhanced Sanitary Survey” form used by the inspectors by going to DEQ’s web site at [http://www.deq.idaho.gov/water/assist\\_business/pws/enhanced\\_sanitary\\_survey.pdf](http://www.deq.idaho.gov/water/assist_business/pws/enhanced_sanitary_survey.pdf). You may want to use this form as a checklist in your preparation for your sanitary survey.

As a note, the questions covered under Section 7-Financial Capacity of the ESS form are often ones that operators are not familiar with. The Financial Capacity survey questions are posted at the web address above. You can provide this section to your system bookkeeper, treasurer, or accountant to be completed in advance of the inspection.

Remember, a comprehensive evaluation of your water system can be successfully completed in less time by having all of the necessary information listed above available at the time of inspection.

**The purpose of a sanitary survey is to protect public health by identifying system deficiencies and recommending possible solutions.**

### Conducting the survey/significant deficiencies

When it is time for your sanitary survey, your local DEQ regional office or the local district health department will contact you by telephone to set up an appointment.

During the survey the inspector may identify “significant deficiencies,” which will require corrective action.

*A significant deficiency* is any defect in a system’s design, operation, maintenance, or administration, as well as any failure or malfunction of any system component, that DEQ determines will cause, or have potential to cause, the introduction of contamination into water delivered to a system’s customers.

Significant deficiencies include, but are not limited to, the location of a well near a source of fecal contamination (such as a failing septic system or a leaking sewer line); the inadequate application of treatment chemicals; the entrance of contaminants into the distribution system; inadequate cleaning and maintenance of storage tanks; inadequate record keeping; and the lack of operator licensing or training.

Deficiencies will be documented on DEQ’s Preliminary Inspection Findings Form (PIFF) and a copy will be given to the public water system representative present at the time of the inspection. The PIFF form provides documentation listing “high priority” issues on which corrective action should begin immediately.

### After the sanitary survey

After completion of the survey, the inspector sends a comprehensive follow-up letter and inspection report to the water system.

The letter provides a summary of all deficiencies, as well as recommendations for the necessary improvements to return the system to compliance with the state’s drinking water rules.

*The system must respond in writing no later than 45 days after receipt of the sanitary report* describing how, and on what schedule, the system will address significant deficiencies identified in the survey.

This requirement does not mean that the deficiencies must be fixed within 45 days - it means that the system must have a plan within 45 days outlining how it will proceed.

Some deficiencies may require labor intensive activities or more capital to remedy. These items will need to be incorporated into long term planning associated with management of the system.

### Benefits of a survey

Use the time during the sanitary survey to ask questions. The inspector is there to help you ensure that your system is constructed, operated, and maintained in a manner that will provide safe drinking water to your customers.

**Use the time during the sanitary survey to ask the inspector any questions you may have.**

Systems benefit by receiving one-on-one technical assistance, operator education, identification of operation and maintenance practices that need modification or correction, and explanation of new techniques or upcoming changes under state and federal laws.

Contact your inspector if you have questions before or after your sanitary survey. Inspectors are also available to assist you at other times and not just during a sanitary survey inspection.

Sanitary surveys can help spot problems before they occur and provide valuable technical assistance preventing possible severe public health impacts on consumers, as well as saving the system additional operating costs, fines, and possible lawsuits.

The major responsibility of a public water system owner is ensuring that customers get safe water to use and drink, and the sanitary survey helps to achieve this goal. ■

## Training Schedule

Class/Sponsor	Location/Date		
Building Budgets/Rate Structures (IRWA) - W/WW	Moscow, 10/3/07	Operator's Bag of Tools (BE) - W	Paul, 12/5/07
VSWS Licensure Review (BE) - W	Nampa, 10/13/07	Red, Black, Stinking Water (BE) - W	Arco, 12/6/07
Water Treatment I & II (IRWA) - W	CDA, 10/24-25/07	Pumps & Motors O&M (IRWA) - W/WW	Lewiston, 12/12/07
Sampling Plans (BE) - W	Twin Falls, 10/30/07	Confined Space (IRWA) - W/WW	Meridian, 12/18/07
Operation & Maintenance (BE) - W	Nampa, 10/31/07	Pumps & Motors (BE) - W/WW	Boise, 12/20-21/07
Troubleshooting (BE) - W	Caldwell, 11/1/07	<p><i>(BE) = Brown Environmental, Inc.</i>  <i>(IRWA) = Idaho Rural Water Association,</i></p> <p><i>For further information, contact the following:</i></p> <p><i>Brown Environmental, Inc. 1-800-543-4358</i>  <i>or for the Boise area, 1-208-465-5725.</i>  <i>Web site: <a href="http://www.idahooperatortraining.com/">www.idahooperatortraining.com/</a></i></p> <p><i>Idaho Rural Water Association 1-800-962-3257</i>  <i>or 1-208-343-7001, Fax: 1-208-343-1866.</i>  <i>E-mail: <a href="mailto:irwa@idahoruralwater.com">irwa@idahoruralwater.com</a>.</i>  <i>Web site: <a href="http://www.idahoruralwater.com/irw.index.aspx">www.idahoruralwater.com/irw.index.aspx</a></i></p>	
Basic Lab & Data Interpretation Training (IRWA) - W	Boise, 11/13/07		
SWS Sanitary Survey/O&M (BE) - W	Wilder, 11/13/07		
SWS Sanitary Survey/O&M (BE) - W	Lewiston, 11/14/07		
Fire Hydrant & Valve Workshop (IRWA) - W	Payette, 11/15/07		
SCADA (BE) - W/WW	Fruitland, 12/4/07		

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