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SUBJECT: Surveillance & Regulations – Ground Water Rule Implementation Procedures

REFERENCE: WM 823 (SDWIS), WM 851 (Sanitary Surveys), WM 859 (Public Notification),
WM 880 (Membrane Filters),
WM 907 (Lead & Copper Short Term Revisions and Clarifications),
ODW's Compliance Sampling and Reporting Guidance Manual,
EPT/002/2007: Boil Water Advisories During Hurricanes and Other Natural Disasters,
EPA's Sanitary Survey Guidance Manual for Ground Water Systems,
EPA's Triggered and Representative Source Water Monitoring Guidance Manual

SUMMARY STATEMENT

This memo summarizes the requirement of the Ground Water Rule (GWR) and ODW staff implementation procedures. The GWR establishes a risk-targeted approach to identify public groundwater systems susceptible to fecal contamination. Identified systems are required to take corrective action.

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1. INTRODUCTION

The Groundwater Rule (GWR) was finalized by the US Environmental Protection Agency (EPA) on November 8, 2006 to provide increased protection against microbial pathogens in waterworks that use groundwater sources. This rule is in accordance with the Safe Drinking Water Act (SDWA) as amended, which requires EPA to promulgate National Primary Drinking Water Regulations requiring disinfection as a treatment technique for all waterworks. The GWR establishes a risk-based approach to target groundwater sources that are susceptible to fecal contamination instead of requiring disinfection for all groundwater sources. In particular, the GWR focuses on reducing illness and death associated with viral infection. Corrective Action is required for waterworks with confirmed fecal contamination or a documented significant deficiency. As a matter of reference, the term 'source' in this document refers to a well or spring which produces groundwater.

2. APPLICABILITY AND COMPLIANCE DATES

The GWR is applicable to waterworks with groundwater sources, unless groundwater sources are combined with surface water or groundwater declared under the direct influence of surface water (GUDI) before filtration treatment. Wholesale waterworks that produce groundwater and consecutive waterworks which receive groundwater must comply with the requirements of the GWR. Waterworks must comply with the GWR requirements starting December 1, 2009.

3. SANITARY SURVEY REQUIREMENTS

A. Sanitary Surveys

Sanitary Surveys are required for all waterworks. Sanitary Surveys must address the following eight elements, to the extent that they apply to an individual waterworks:

1. Source(s)
2. Treatment
3. Distribution System
4. Finished Water Storage
5. Pumps, Pump Facilities and Controls
6. Monitoring, Reporting and Data Verification
7. System Management/Operation
8. Operator Compliance with VDH & DPOR requirements

Beginning December 1, 2009, the GWR requires the applicable elements to be evaluated a <u>minimum</u> of once every three years for community systems and once every five years for noncommunity waterworks. The evaluation of the individual elements may be conducted over multiple site visits, according to the Field Office inspection schedules, as long as all

eight elements are initially evaluated by December 31, 2012 for community waterworks and December 31, 2014 for noncommunity waterworks. Completed element evaluations will be documented on written sanitary survey reports and in State Drinking Water Information System (SDWIS) database. Further guidance on sanitary survey scheduling, tracking and documentation will be provided in WM 851.

B. Significant Deficiencies

Significant Deficiency means any defect in a waterworks' design, operation, maintenance, or administration, as well as any failure or malfunction of any system component that may cause, or have the potential to cause, an unacceptable risk to health or that could affect the reliable delivery of safe drinking water.

The GWR requires the waterworks owner to correct Significant Deficiencies identified by ODW staff during sanitary surveys. A list of *potential* groundwater waterworks significant deficiencies is provided in Appendix A for groundwater systems. ODW staff may also determine event-specific significant deficiencies as appropriate. More guidance will be provided in WM 851-Sanitary Surveys and the SDWIS Manual.

If a staff member performing a sanitary survey observes one of these deficiencies, concurrence must be obtained from the Deputy Field Director prior to formal notification to the waterworks owner. The observed deficiency shall be subject to any of the following questions in order to confirm that it is a significant deficiency:

- Does the deficiency cause the potential for acute and chronic contaminants to be introduced into the drinking water?

- If left uncorrected, will the deficiency cause the potential for the introduction of acute and chronic contaminants into the drinking water at some point in the future?

- Does the deficiency affect treatment in an unacceptable manner?

Within 30 days, ODW must notify the waterworks owner in writing of a confirmed significant deficiency. (Use the sample Significant Deficiency notification letter and Corrective Action Plan in Appendix F) If a significant deficiency exists, then Corrective Action as defined in Section 5.B. of this memo is required.

4. GROUNDWATER SOURCE MICROBIAL MONITORING

A. Overview

The GWR requires specific raw water testing *in addition to* the raw water monitoring outlined in the Compliance Sampling and Reporting Guidance Manual. A total coliform positive distribution sample 'triggers' raw water monitoring. The purpose of the 'triggered source water' sample is to assess potential fecal contamination of the source. More detailed information can be found in EPA's Triggered and Representative Source Water Monitoring Guidance Manual.

ODW has determined that *Escherichia coli* (*E. coli)* will be the source water monitoring fecal indicator utilized for GWR raw water sampling. The EPA-approved analytical methods are:

Methodology	Method Name
Colilert	9223 B
Colisure	9223 B
Membrane Filter Method with MI Agar	EPA Method 1604
m-ColiBlue24 Test	-
E*Colite Test	-
EC-MUG	9221 F
NA-MUG	9222 G

B. Triggered Source Water Monitoring

Compliance with the monitoring requirements outlined below will be completed in accordance with the deadlines in the "Compliance Determination completed by field office" task listed in the "Mandatory SDWIS Database Activities" table in WM 823.

1. Any waterworks with a groundwater source not approved for 4-log inactivation of viruses, or not verifying such treatment by conducting compliance monitoring, notified of a total coliform positive distribution system sample, must conduct triggered source water monitoring.

2. For triggered source water monitoring, at least one raw water sample must be collected from each source in use at the time the total coliform positive distribution system sample was collected.

   One triggered source water monitoring kit, for each source in service at the time of the coliform positive sample, will be included with TCR repeat sample kits, if DCLS is used. The field office staff will use R&R to produce lab-specific sampling documents if DCLS is used. If DCLS will perform the analysis, Field Office staff will print individual sampling input forms for each kit (triggered and repeat) as well as place the electronic ad hoc order for the following month's increased routine order. This process allows for DCLS to bill the waterworks for the correct number of kits for triggered, repeat and temporary routine monitoring. If a private lab will perform the analysis, Field Office staff will generate a sampling requirement notice (from R&R) and email, fax or mail the report to the waterworks owner. This report will include facility and sample point ID information for the waterworks owner to forward onto the private laboratory for electronically uploading results data to ODW.

   Note: Systems that have more than one source are required to collect a sample from each source in service unless they have an approved triggered source water monitoring plan that allows representative monitoring (see Section 4.G.2. of this memo).

3. Raw water samples must be collected within 24 hours of notification of the total coliform positive sample result.

4. Each raw water sample must be analyzed for the presence of *E. coli*. If the raw water sample tests *E. coli* - positive then the waterworks must provide public notification as described in Section 7.A. of this memo, and conduct additional raw water monitoring as described in Section 4.C.

5. Waterworks serving a population of 1,000 or fewer persons may use a groundwater raw sample to satisfy the requirements of both the triggered source monitoring requirement of the GWR and repeat sampling requirement of the Total Coliform Rule (TCR).

   Note: Only sources without treatment will be allowed to use a triggered source sample as a TCR repeat sample. If the raw water sample is coliform-positive and E. coli - negative, the GWR does not require further action but the waterworks is in violation of the TCR MCL.

C. Additional Source Water Monitoring.

1. If a triggered raw water sample result is *E. coli*-positive, then the waterworks must collect five (5) additional raw water samples from the *E. coli*-positive source(s) within 24-hours of notification. Public notification as described in Section 7.A. is required.

   The Field Office staff will use R&R to produce lab specific sampling documents. If DCLS will perform the analysis, Field Office staff will print individual sampling input forms for each selected source. If a private lab will perform the analysis, Field Office staff will generate a sampling requirement notice from R&R and email, fax or mail the report to the waterworks owner. This report will include facility and sample point ID information for the waterworks owner to forward onto the private laboratory for electronically uploading results data to ODW.

2. All five (5) of the additional raw water samples must be analyzed for the presence of *E. coli*. If any of the five samples is *E. coli*-positive, then the waterworks must take the following actions:

   - Corrective Action(s) as defined in Section 5.B of this memo is required.
   - Public notification as described in Section 7.A is required.
   - A GUDI re-evaluation of the source(s) as described in Section 7 of the Compliance Sampling and Reporting Guidance Manual is required. The purpose of the GUDI re-evaluation is to ensure that 4-log inactivation alone is sufficient treatment.

D. TCR-Positive Results & Repeat Sampling for Consecutive and Wholesale Waterworks

1. Consecutive waterworks that have a total coliform positive distribution system water sample must notify the wholesale waterworks, within 24 hours of notification, of the total coliform positive sample.

2. Wholesale waterworks must, upon receipt of notification of a total coliform positive distribution system sample from a consecutive waterworks, collect a raw water sample from each of its water sources that provide water to the consecutive waterworks and have it analyzed for presence of *E. coli* within 24-hours of notification.

3. Wholesale waterworks must notify all consecutive waterworks served of any raw water *E. coli* - positive results.

E. General Sampling Requirements

1. All waterworks required to monitor raw water must use a lab certified by DCLS for the analysis of *E. coli*. The approved list of test methods is given in Section 4.A.

2. Raw water sample taps must be provided for all sources. Taps must be located prior to any treatment or storage. Sample collectors at waterworks with treatment facilities should be advised to collect the raw water sample when the well pump is pumping.

3. Representative sampling may be approved on a case-by-case basis should the piping configuration not allow sampling of the well itself.

4. A Total Coliform-negative raw water sample result equates to *E. coli* - negative.

5. If a groundwater source sample is invalidated per Section 4. F, the waterworks must collect another raw water sample within 24-hours of being notified of the invalidation decision and have it analyzed for the presence of *E. coli*.

F. Sample Invalidation

Positive sample invalidation should be a rare occurrence. However, a waterworks may request invalidation of an *E. coli* - positive groundwater raw water sample if the following conditions exist:

1. The waterworks provides ODW with written notice from the laboratory that an improper sample analysis occurred, or

2. The waterworks provides sufficient evidence and ODW determines, and documents in writing, that an *E. coli* - positive raw water sample is not related to source water quality.

G. Triggered Source Water Monitoring Plans (TSWMP)

1. A triggered source water monitoring plan is required for all waterworks with groundwater sources not approved for 4-log inactivation of viruses. The plan must include the applicable monitoring requirements of the GWR. Waterworks must submit triggered source water monitoring plans to ODW for approval. This will be incorporated into the Bacteriological Sample Site Report (BSSR) and include the following items:

    a. Map of waterworks with sources and/or entry points and TCR BSSR monitoring locations indicated;

    b. For wholesale waterworks, identification of consecutive waterworks served and sources providing water to the consecutive waterworks;

    c. For consecutive waterworks, identification of wholesale waterworks along with notification requirements;

    d. For waterworks rotating sources in and out of service based on seasonal operating practices, listing of typical begin and end dates of service. Waterworks with multiple sources that are not operated simultaneously for consecutive weeks or months shall provide clear statements that raw water samples are to be collected from the source(s) in service at the time the total coliform positive distribution system sample was collected;

    e. Public notification requirements in the event of an *E. coli* - positive source water sample

    f. Number of raw water samples to be collected from sources in the event of a total coliform positive distribution system sample and *E. coli* - positive raw water sample.

2. Waterworks with multiple sources may conduct <u>*representative*</u> raw water sampling in order to reduce the burden of triggered raw water monitoring. One of the following specific conditions must be met and listed in the approved triggered raw water monitoring plan:

    a. Hydraulic conditions dictate that a source provides water to an isolated area of the distribution system. Consequently, only source(s) identified as providing water to specific TCR monitoring locations must collect the triggered raw water samples based on sample results from the specified TCR sample point. The plan must clearly identify groundwater sources linked to each TCR monitoring site in the waterworks' BSSR.

    b. Documentation accepted by ODW exists that clearly demonstrates that the sources are chemically, physically and hydro-geologically similar. Consequently, one source

may serve as the triggered raw water sample location representing two or more sources. The plan must clearly list representative triggered raw water monitoring procedures, based on the documentation. References to the documentation must be included in the plan.

Note: Field Office staff must ensure that all waterworks have an approved combined BSSR/TSWMP before December 1, 2009. Use the revised model BSSR/TSWMP in the Compliance Sampling and Reporting Guidance Manual.

5. TREATMENT TECHNIQUE REQUIREMENTS

A. General

A waterworks is subject to the Treatment Technique requirements of this section if it meets either one of the following criteria:

1. The waterworks has an *E. coli* - positive sample result in any one of the five additional triggered raw water samples. A confirmed *E. coli* contamination is defined as E. coli - positive results in the triggered and any one of the additional source water samples.

2. A significant deficiency has been identified as outlined in Section 3.B of this memo.

Field Office staff shall place a high priority on initiating action to resolve a Treatment Technique requirement.

B. Corrective Actions

The GWR requires that waterworks notified of meeting either one of the above criteria implement Corrective Action. An ODW-approved Corrective Action Plan is required as outline in Section 5.D. Corrective Action(s) must include at least one of the following activities:

1. Correct all significant deficiencies.

2. Provide an alternate source(s) of water. (example: new well or connection to another waterworks)

3. Eliminate the source of contamination. (example: cross connection has been identified)

4. Provide treatment that reliably achieves at least 4-log (99.99%) inactivation of viruses before or at the first customer. This Corrective Action requires ODW review and approval prior to implementation. See next section for additional information.

Note: Temporary disinfection of groundwater sources by applying shock chlorination could be considered if there is reason to suspect that recent groundwater source maintenance activity or flooding has contributed to the distribution system coliform-positive result. Well disinfection procedures for groundwater systems shall be consistent with Appendix 4 of Boil Water

Advisories During Hurricanes and Other Natural Disasters (EPT/002/2007). Specific recommendations are as follows:

- *The disinfection should take place before the triggered sample is collected (documentation must be made to the file indicating why the sample collection was delayed).*
- *If a coliform-positive distribution sample is collected in the monitoring period following the original coliform-positive (well was disinfected) then no well disinfection should be allowed before collecting the triggered water sample.*

Shock chlorination of the groundwater source may be considered in the appropriate situations to prevent a waterworks from being unnecessarily subject to the Treatment Technique requirements and Corrective Action requirements of the GWR. However, the potential exists for the abuse of this policy by waterworks. Shock chlorination is not an appropriate solution to a chronic bacteriological problem.

C. Field Office Staff Actions.

Field Office staff will act on confirmed *E. coli* contamination and Significant Deficiencies as follows:

1. For confirmed *E. coli* contamination the field office staff will:

   a. Upon becoming aware of the sample result, immediately contact the waterworks to issue a Tier 1 public notice (see Appendix B) which advises consumers to boil water. Phone or in-person contact will be the minimum acceptable contact type to satisfy this requirement. E-mail is not acceptable primary contact method, but can used for supplemental communication;

   b. Within 5 business days mail written follow-up notification to the waterworks. Use the Treatment Technique Notification letter template with Corrective Action Plan in Appendix E. The default corrective action is requiring 4-log virus inactivation treatment of the source.

   c. Initiate steps for a GUDI reevaluation of the source as described in Section 7 of the Compliance Sampling and Reporting Guidance Manual.

2. Significant Deficiency has been identified: follow the Significant Deficiency issuance procedure as outlined in Section 2.B of this memo.

D. Corrective Action Plans

Draft Corrective Action Plans (CAP) will usually be generated by ODW staff and included with the formal notification of a significant deficiency or confirmed *E. coli* contamination. The transmittal letter must inform the waterworks owner to review, sign and return the proposed CAP. The waterworks owner may revise the proposed CAP (with ODW review

and approval) or develop an owner-generated CAP (see below). The CAP will include a list of specific activities, along with a schedule, to correct either confirmed *E. coli* contamination or a significant deficiency. CAPs are enforceable schedules of compliance and must include the following:

1. A statement of the deficiency
2. The action(s) necessary to correct the deficiency
3. Detailed schedule with begin dates and deadlines for each step to correct the deficiency
4. A statement that the waterworks will notify in writing the appropriate field office when the actions listed in the plan have been completed within 30 days of completing individual scheduled actions.

Corrective Action Plans may include the following:

1. Interim measures necessary to prevent a recurrence
2. Source of funding, if necessary
3. Any follow-up actions

If the waterworks owner desires to develop the Corrective Action Plan, field office staff must advise the waterworks owner that:

- A 30 day period to consult with ODW regarding the Corrective Action(s) is required and
- A subsequent 15 day period to submit to ODW a written Corrective Action Plan is also required.

CAP action items and associated completion dates must be logged in SDWIS for compliance tracking.

E. Corrective Action Plan Follow-Up

Within 120 days of receiving written notification of either confirmed *E. coli* contamination or a significant deficiency, the waterworks owner must complete all Corrective Actions or be in compliance with the schedule of activities in an approved CAP. Staff should encourage waterworks owners to fully implement the CAP within 120 days.

Failure to complete Corrective Actions or meet the approved schedule deadlines is a Treatment Technique violation. However, events may preclude the meeting of a deadline. Waterworks should then be advised to submit a revised CAP with revised schedules or new actions with schedules.

The waterworks owner must notify ODW within 30 days of completing any required Corrective Actions. Logging of all deadlines for actionable items must be done for tracking purposes. See Section 6 of this memo for additional information.

Onsite inspections will be conducted by Field Office staff after notification from a waterworks that a CAP has been completed. The inspection must be conducted within 30 days of notification from the waterworks. A written report of the inspection will document

and inform the waterworks of our concurrence, or non-concurrence, with the waterworks that the completed corrective action(s) meet(s) the intent of the CAP. In addition, logging of status of the deficiency in the SDWIS Site Visit Module must be completed.

F. 4-log Inactivation of Viruses

This Corrective Action requires 4-log inactivation of viruses before the first customer for each groundwater source. Treatment for the 4-log inactivation of viruses may be chosen by the waterworks owner as an alternative to triggered source water monitoring or it may be a prescribed Corrective Action by ODW. For waterworks that do not currently chlorinate, Lead & Copper sampling must return to initial monitoring schedules as described in WM 907 – Lead & Copper Short Term Revisions and Clarifications for corrosion control considerations.

If 4-log inactivation is required as a Corrective Action, then completion of a GUDI re-evaluation of the source as described in as described in Section 7 of the Compliance Sampling and Reporting Guidance Manual is required to determine if 4-log inactivation alone is sufficient treatment.

1. Application of chemical disinfectants

   Disinfection shall be accomplished by the application of chlorine. The specific chlorine compound shall be selected based on the site-specific requirements. Design, operation and maintenance shall be in accordance with the *Waterworks Regulations*.

   "CT" is to be evaluated in accordance with the *Waterworks Regulations.* The District Engineer is responsible for reviewing the waterworks proposed treatment for compliance with the 4-log inactivation of viruses. Use the review form given in Appendix C. The virus inactivation tables show that waters with a pH between 6 and 9 provide the same inactivation capability. Groundwater sources with a history of pH greater than 9 (pH < 6 assumes a greater inactivation rate) will have to be evaluated on a case-by-case basis. ODW has assumed, based on commonly accepted knowledge, that the minimum groundwater temperature in all geographic regions of the Commonwealth is no colder than 50 degrees F.

   The minimum free chlorine residual must be determined for the waterworks. This information along with the compliance monitoring requirements will be transmitted to the waterworks. Use notification letter given in Appendix D. The waterworks must be aware that physical changes to the waterworks prior to the entry point may alter the criteria used to determine 4-log inactivation of viruses.

   For any existing or new treatment facilities, engineering description sheets and waterworks operations permits will be amended to indicate the special permit requirements for 4-log inactivation of viruses (use sample provided in Appendix G). This requirement will enable staff to easily differentiate between waterworks that provide 4-log inactivation of viruses and waterworks which are applying chlorine for other reasons.

The amended Operation Permit will be submitted to the Central Office for processing within 45 days of a determination that the existing treatment facilities are capable of 4-log virus inactivation.

Other chemical disinfectants may be considered on a case-by-case basis.

The waterworks must begin compliance monitoring within 30 days of the 4-log inactivation notification.

2. Virus removal via membranes

   No credit for virus reduction using membranes will be given until such time as integrity testing methods are available and reliable under all anticipated conditions (see WM 880).

Note: When reviewing plans for modification to the waterworks, the impact of the modification on the 4-log inactivation treatment facilities must be evaluated. If the proposed modification will result in an inability of the waterworks to meet 4-log inactivation, they must redesign their proposed modifications to ensure that 4-log inactivation is continued.

G. Compliance Monitoring

Waterworks providing 4-log inactivation of viruses using chlorine as required by ODW, or as an option to avoid triggered source water monitoring, must monitor for and ensure the ODW determined minimum free chlorine residual concentration is continuously maintained. No routine monitoring of temperature or pH is necessary unless alternate criteria were used in the 4-log inactivation evaluation.

1. Waterworks serving populations ≤ 3,300 must determine free chlorine residual once a day at an approved location (i.e. location stated in the ODW document informing the waterworks of monthly reporting requirements or in the waterworks chlorine residual monitoring plan).

   If the chlorinator feeds into a line with relatively constant flow (e.g. well pump discharge) then monitoring anytime when the pump is running is adequate. In the event that the chlorination is paced to widely variable flow (e.g. pressure tank or booster pump discharge), the timing of the sample collection should be dictated to be when the peak demand is expected.

   Note: The ≤ 3,300 population waterworks may elect to provide continuous monitoring as outlined below to satisfy this requirement; however, daily attendance or remote monitoring (described below) is still required.

2. Waterworks serving populations > 3,300 persons must monitor and record free chlorine residual continuously at the approved location (i.e. location stated in the ODW document

informing the waterworks of monthly reporting requirements or in the waterworks chlorine residual monitoring plan).

Online analyzers that analyze no less frequently than 15 minutes are considered continuous. The waterworks must report the lowest residual detected on each day. Instruments used for continuous monitoring must be calibrated with a grab sample measurement at least every five days. The calibration samples shall be maintained in a separate log for review during routine sanitary surveys.

Note: Waterworks that provide a continuous online analyzer and provide a means of remote monitoring 24 hours per day/ 7 days per week may visit the site three times per week instead of daily attendance.

3. In the event that a waterworks either does not maintain the ODW-specified minimum free chlorine residual, or has inoperable continuous monitoring equipment, then waterworks must collect free chlorine residual samples every 4 hours until sufficient free chlorine residual is verified or continuous monitoring equipment is returned to service. In the event of insufficient free chlorine residual for more than 4 hours, the waterworks will be cited for a treatment technique violation.

4. Malfunctioning continuous monitoring or recording equipment must be returned to service within 14 days. Exceeding the 14 day limit is a treatment technique violation.

H. Discontinuing Treatment and/or Compliance Monitoring

A waterworks that has chosen to provide 4-log inactivation of viruses to avoid triggered source water monitoring may request to cease providing this treatment. The waterworks may cease 4-log inactivation treatment and/or compliance monitoring upon written approval by the Field Director.

1. A request to cease 4-log inactivation treatment may be granted if the source has been evaluated in accordance with Section 7 of the Compliance Sampling and Reporting Guidance Manual and does not require a disinfectant.

2. A request to cease compliance monitoring may be granted as long as the waterworks agrees to conduct triggered source water monitoring in accordance with Section 4.

Sources that have been required to install 4-log inactivation treatment may not discontinue treatment or compliance monitoring.

6. WATERWORKS REPORTING REQUIREMENTS AND COMPLIANCE DETERMINATIONS

Field office staff must provide monthly oversight in five areas, as listed below:

A. Monthly Operations Reports (MORs)

Waterworks providing 4-log inactivation of virus treatment must document daily virus inactivation in monthly operations reports. Documentation of compliance monitoring must include, at a minimum, the daily lowest free chlorine residual concentration. ODW considers groundwater pH and temperature to be seasonally consistent and the same each day within the following parameters: pH – 6 to 9; temperature ≥50 Degrees F. Therefore, monthly reporting of pH and temperature will not be required, unless alternate criteria were specified in ODW's 4-log inactivation approval letter.

B. Triggered Source Water Monitoring

Results from triggered and additional raw water samples must be reported to ODW by the 10th of the subsequent month of the monitoring period within which the samples were collected. Field Office staff will evaluate compliance status of triggered source water monitoring events simultaneously with monthly TCR compliance determinations. SDWIS TCR compliance determination tools will be used.

Waterworks owners must report to ODW as soon as practical, but no later than 24 hours, after learning of an *E. coli* positive source water sample.

C. Corrective Actions

Waterworks must report, within 30 days from the date of completion, the individual corrective actions completed. By the first of every month Field Office staff will update the status of individual Corrective Actions per the approved Corrective Action Plan and update status in SDWIS.

D. Equipment Malfunctions

1. Chlorination equipment - The waterworks must notify ODW as soon as possible but no later than the end of the next business day of any failure to provide continuous chlorination.

2. Continuous chlorine residual analyzers and recording equipment - The waterworks must notify ODW as soon as possible but no later than the end of the next business day of a failure of the analyzer or the recording equipment. In the event of a recording equipment failure the waterworks will record chlorine residual as specified in Section 5.G.3 of this memo.

E. Records Retention

Verification that waterworks are maintaining adequate documentation and records will be made during routine inspections. Copies of records must be retained as follows:

- Notices to the public. Kept for 3 years.
- Corrective Actions. Kept for 10 years.
- Consecutive waterworks - notification to the wholesale waterworks of total coliform positive sample(s). Kept for 5 years.

Technical assistance should be provided by the Field Office staff by contacting the wholesalers of groundwater whenever staff becomes aware of a coliform-positive TCR sample collected from the consecutive waterworks.

7. PUBLIC NOTIFICATION

Field Office staff must inform waterworks to perform timely Public Notification (PN) when there is a failure to comply with requirements of the GWR. A list of violations and the required method of notification (PN, CCR or Special Notice) is presented below. Examples are provided in Appendix B.

Issue	Notification Required
Uncorrected significant deficiency – Community[1]	Special Notice in CCR
Uncorrected significant deficiency – NonCommunity[2]	Special Notice
E. coli - positive source sample – Community[2]	Tier 1 public notice, Special notice in CCR
E. coli - positive source sample –NonCommunity	Tier 1 public notice
Unaddressed *E. coli.* Positive source water sample – Community	Special notice in CCR
Failure to take corrective action - Community	Tier 2 public notice, CCR
Failure to take corrective action - NonCommunity	Tier 2 public notice
Failure to maintain 4-log treatment of viruses – Community	Tier 2 public notice, CCR
Failure to maintain 4-log treatment of viruses – NonCommunity	Tier 2 public notice
Failure to meet monitoring requirements - Community	Tier 3 public notice, CCR
Failure to meet monitoring requirements – NonCommunity	Tier 3 public notice

The GWR explicitly allows ODW to add other violations and/or situations to the Tier 1 list that have significant potential to have serious adverse health effects. Specific requirements are outlined as follows:

[1] Waterworks must continue to notify the public annually until the significant deficiency has been corrected.

[2] Consecutive waterworks served by the groundwater source must also notify the public.

A. GWR Events Requiring Tier 1 Notice

Tier 1 notification is required when:

1. A raw water sample, positive for *E. coli*, collected under triggered monitoring (Section 4.B of this memo) or

2. A raw water sample positive for *E. coli*, collected under additional source water monitoring (Section 4.C of this memo).

Note: Item 1 does not require a Boil Water Advisory be issued with the notice. Item 2 does require a Boil Water Advisory be issued. Refer to example notices provided in Appendix B.

B. GWR Events Requiring Tier 2 Notice

Tier 2 notification is required when:

1. Waterworks fails to meet a schedule deadline for Corrective Action with any one of the following:
   a. Waterworks has been notified by ODW of a Significant Deficiency.
      Example: Deadline passes for a corrective action listed in a Corrective Action Plan
   b. ODW required Corrective Action due to confirmed fecal contamination in raw water sample(s). Example: Waterworks failed to install 4-log inactivation treatment within the required schedule.

2. Failure to maintain continuous 4-log inactivation of viruses for a period greater than four hours.

3. Failure to comply with ODW- required interim measures related to correcting a Significant Deficiency and/or eliminating fecal contamination in a groundwater source. Example: Waterworks fails, as required by ODW, to issue a boil water notice during a corrective action activity time period.

4. Malfunctioned continuous chlorine residual monitoring or recording equipment used to confirm 4-log virus inactivation is not returned to service within 14 days.

C. GWR Events Requiring Tier 3 Notice

Tier 3 notification is required when:

1. Failure to conduct any triggered or additional source water monitoring.

2. Failure to conduct compliance monitoring
   <u>Example A</u>: ≤ 3,300 population waterworks fails to determine one or more daily free chlorine residuals at the approved location to verify 4-log virus inactivation.

   <u>Example B</u>: > 3,300 population waterworks fails to determine one or more ‘every 4 hour’ free chlorine residuals when continuous chlorine residual monitoring or recording equipment malfunctions.

8. CONSUMER CONFIDENCE REPORTS

Consumer Confidence Reports (CCR) will be verified to have content pertinent to the requirements of the GWR. Specifically, where applicable, the following information:

- Uncorrected Significant Deficiencies and/or *E. Coli* - positive source water sample for the appropriate year. Uncorrected is not failure to correct; it is stating the waterworks is in the process of correcting the Significant Deficiency.

- Treatment technique violations. Specifically, list failure(s) to take corrective action and failure to maintain continuous 4-log inactivation of viruses.

- Corrected Significant Deficiencies.

- Failures to conduct triggered water, additional source water or compliance monitoring.

9. SPECIAL NOTICE REQUIREMENTS

Special notice requirements are applicable to community and noncommunity waterworks. This notice is to inform the public of any uncorrected Significant Deficiencies or notification of an *E. coli* positive source water sample. Uncorrected is not the same as failure to correct; it is stating the waterworks is in the process of correcting the Significant Deficiency in accordance with the approved Corrective Action Plan.

Field Office staff will provide the noncommunity waterworks draft special notices approximately 30 days prior to the Significant Deficiency issuance 12 month anniversary date. The letter transmitting the draft special notice will advise the noncommunity waterworks of the requirement to issue the notice as well as the method to notify the public. Methods allowed will be the same as Tier 2 TCR MCL violations for noncommunity waterworks. The notice must include the date and nature of the Significant Deficiency, the complete ODW approved plan and schedule and completion status of each item. The waterworks will be advised that the notice may be modified and that ODW concurrence to changes must be requested prior to issuance.

The special notice must be re-issued every 12 months thereafter until the Significant Deficiency is resolved.

Note: Special notice information for community waterworks is included in the annual CCR.

10. SDWIS DATA ENTRY

The GWR requires tracking and logging of various data elements in SDWIS to provide state records and optimize efficiency of ODW tasks. A summary of items for data entry follows:

- The SDWIS "Site Visit" module must be updated to indicate which of the 8 individual sanitary survey elements were completed in a site visit.

- Significant Deficiencies and their data elements, including individual corrective action schedules, must be entered into SDWIS "Site Visit" module when the notification letter is issued (within 30 days of identifying the Significant Deficiency in the Sanitary Survey).

- Public notification required as described in section 9 of this memo must be entered into SDWIS "Enforcement" module within 30 days of advising the waterworks of the notification requirement (letter transmitting the draft special notice, described in previous Section 9).

- When the future SDWIS ver. 3.0 is released, the SDWIS "Inventory" module must be updated to indicate that the "water system facility" provides treatment for 4-log inactivation of virus.

APPENDIX A

POSSIBLE SIGNIFICANT DEFICIENCIES IDENTIFIED DURING SANITARY SURVEY
(Note: shaded items previously identified for surface water systems)

Sanitary Survey Element	SDWIS Category Code	[3]Description (included in SDWIS; max. 95 characters)
Source	SO	SO01-Potential contamination source or activity within 50 ft of well
Source	SO	SO02-Potential contamination of well from surface water runoff
Source	SO	SO03-Well has not been approved by VDH-ODW
Source	SO	SO04-Sanitary seal or pitless adapter well cap missing or defective
Source	SO	SO05-Spring box construction deficient; susceptible to contamination
Source	SO	SO06-Existing demand exceeds source pumping rate
Source	SO	SO07-Existing demand exceeds source "safe yield"
Treatment	TR	TR05-Failure to maintain continuous disinfection
Treatment	TR	TR06-Minimum chlorine residual not maintained to meet CT
Treatment	TR	TR07-Entry point chlorine residual < 0.2 mg/L
Treatment	TR	TR08-Chemicals not certified to ANSI/NSF 60 Standard or GRAS
Treatment	TR	TR09-Chemical storage or handling present risk of explosions
Treatment	TR	TR10-Unprotected or improperly protected cross-connections [4]
Treatment	TR	TR11-Inadequate continuous treatment
Distribution System	DS	DS01-Distribution pressure falls below 20 psi
Distribution System	DS	DS02-Failure to have active Cross-Connection Control Program
Distribution System	DS	DS03-Distribution leakage rate greater than 30%
Finished Water Storage[5]	FW	FW01-Tank not watertight
Finished Water Storage	FW	FW02-Roof / Access hatches not watertight
Finished Water Storage	FW	FW03-Tank structurally unsound
Finished Water Storage	FW	FW04-Vent improperly screened
Finished Water Storage	FW	FW05-Overflow improperly screened or protected from contamination
Finished Water Storage	FW	FW06-Drain improperly screened or protected from contamination
Finished Water Storage	FW	FW07-Potential contamination of finished water from surface water runoff

[3] Numbering subject to change; Significant Deficiencies in SDWIS include Subpart H (surface water) and groundwater systems.
[4] A cross-connection control device is missing or is inadequate
[5] Includes clearwells

APPENDIX A (cont.)

POSSIBLE SIGNIFICANT DEFICIENCIES IDENTIFIED DURING SANITARY SURVEY
(Note: shaded items previously identified for surface water systems)

Sanitary Survey Element	SDWIS Category Code	Description (included in SDWIS; max. 95 characters)
Pumps (facilities and controls)	PU	PU01-Critical pump equipment inoperable
Pumps (facilities and controls)	PU	PU02-Unprotected or improperly protected cross-connections
M&R & Data Verification	MR	MR01-Not using certified lab for compliance testing
M&R & Data Verification	MR	MR02-No BSSR approved by VDH-ODW
M&R & Data Verification	MR	MR03-No TSWMP approved by VDH-ODW
M&R & Data Verification	MR	MR04-Sampling not in accordance with BSSR
M&R & Data Verification	MR	MR05-Sampling not in accordance with TSWMP
Management & Operations	SM	SM01-ODW-required operation testing not performed / recorded
Operator Compliance	OC	OC01-Number and Class of Operators do not meet WW Regulations

APPENDIX B
EXAMPLE NOTICES

Example Tier 1 Public Notification for a *E. coli*-Positive Triggered Source Water Sample

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
[Name of waterworks] Well #[ ] Tested Positive for *E. coli* Contamination

Our water system detected fecal indicators (*E. coli)* in one of our two wells. As our customers, you have a right to know what happened and what we are doing to correct this situation. (*Describe the situation here*) (Example: On [MM DD], we learned that one of our routine samples collected [MM DD] was total coliform positive. As required by EPA's Ground Water Rule, one of our follow-up steps was to collect samples from both of our wells. The sample from Well [ ] collected on [MM DD] tested positive for a fecal indicator (*E. coli).* We are now conducting additional sampling of the well to determine the extent of the problem and are conducting a thorough investigation to determine the source of the contamination.)

What should I do?
You may wish to use bottled water for drinking, making ice, preparing food, and washing dishes.

Also, if you have a severely compromised immune system, have an infant, or are elderly, you may be at increased risk and should seek advice about drinking water from your health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791. If you have specific health concerns, consult your doctor or the Local Health Department.

What does this mean?
Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches. *Fecal indicators are microbes whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term health effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.* These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?
We are conducting a thorough investigation to determine the source of the contamination and will be working with the Department of Health to implement corrective actions to ensure that our water supplies are protected against contamination. We will keep you informed of the steps we are taking to protect your drinking water and will provide information on any steps you should be taking, until this problem is corrected.

For more information, please contact , at (xxx) xxx-xxxx

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by [name of waterworks].

Water System ID#xxxxxxx Sent: mm/dd/yyyy

APPENDIX B (cont.)
EXAMPLE NOTICES

Example Tier 1 Public Notification for confirmed *E. coli*-Positive in any of the Additional Source Water Samples

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER
[Name of waterworks] Well #[ ] Tested Positive for *E. coli* Contamination

Our water system detected fecal indicators (*E. coli)* in [describe]. As our customers, you have a right to know what happened and what we are doing to correct this situation. (*Describe the situation here*) (Example: The triggered sample from Well #[ ] collected on [MM DD] tested positive for a fecal indicator (*E. coli).* We were required to collect five additional samples from Well #[ ] on [MM DD]. One of the five samples collected tested positive for a fecal indicator *(E.coli)*

What should I do?
DO NOT DRINK THE WATER WITHOUT BOILING IT FIRST. Bring all water to a rolling boil, let it boil for one minute, and let it cool before using it. Boiling kills bacteria and other organisms in the water. You may also use bottled water. Use boiled or bottled water for drinking, making ice, preparing food, and washing dishes until further notice.

Also, if you have a severely compromised immune system, have an infant, or are elderly, you may be at increased risk and should seek advice about drinking water from your health care providers. General guidelines on ways to lessen the risk of infection by microbes are available from EPA's Safe Drinking Water Hotline at (800) 426-4791. If you have specific health concerns, consult your doctor or the Local Health Department.

What does this mean?
Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and associated headaches. *Fecal indicators are microbes whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term health effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.* These symptoms are not caused only by organisms in drinking water. If you experience any of these symptoms and they persist, you may want to seek medical advice.

What is being done?
We are working with the Department of Health to implement corrective actions to ensure that our water supplies are protected against contamination. We will keep you informed of the steps we are taking to protect your drinking water and will provide information on any steps you should be taking, until this problem is corrected.

For more information, please contact , at (xxx) xxx-xxxx

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by [name of waterworks].

Water System ID# xxxxxxx Sent: [mm/dd/yyyy]

Example of Regulated Contaminant Table and Special Notice in the CCR for Source Water Fecal Contamination

Source Water Quality Data

Contaminant	MCL/ MRDL/ TT	MCLG	Value	Date	Violation	Typical Sources
Fecal Indicators (E. coli)	TT	N/A	Positive (E. coli)	April 5, 2010	No	Human and animal fecal waste

Waterworks XYZ detected *E. coli* in their source water sample; the sample was collected in response to a total coliform positive routine sample collected on April 2, 2010. More information about this situation is provided in the Situation section.

Situation

• On April 4, 2010 we were informed that one of our routine total coliform samples collected on April 2 was total coliform-positive. As required by the Ground Water Rule, we collected samples from both of our sources, Wells 1 and 2, and had them analyzed for fecal contamination. The sample for Well 1 was positive for fecal contamination (*E. coli*).

• Inadequately treated or inadequately protected water may contain disease-causing organisms. These organisms can cause symptoms such as diarrhea, nausea, cramps, and headaches. *Fecal indicators are microbes whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term health effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems.*

• In response, we sent notices to all of our customers within 24 hours of learning of this positive sample. We carefully considered our options and developed a plan with the VDH Office of Drinking Water to install treatment (chlorination). As we stated in the most recent update on this issue, treatment was installed on June 1, 2010.

Example of a Special Notice Regarding a Significant Deficiency Scheduled Activity Deadline Violation

On September 14, 2013, we were informed by the VDH Office of Drinking Water that a significant deficiency—two leaking septic tanks near our source water supply—had been identified during a September 1, 2013 sanitary survey.

As required, we contacted the VDH Office of Drinking Water and were directed to develop a corrective action plan that included working with the owner to replace the septic tanks. We did not do so within the established deadline. Since being informed of the deficiency, we have been conducting regular testing of our source water and we are implementing the corrective action plan established by the VDH. Under the revised corrective action plan, the leaking tanks will be replaced by October 20, 2014.

APPENDIX C
4-LOG VIRUS TREATMENT EVALUATION FORM

INSTRUCTIONS

This form is to be used in evaluating a waterworks for compliance with 4-log treatment for virus removal.

1. Determine what facilities the waterworks has that may be used in calculating CT. Recommended procedure is to evaluate atmospheric storage first, pressure storage second and pipeline last. For pressure tanks that float on the system with a combined inlet/outlet no effective T is available.

2. Determine the peak hourly flow rate for each component to be evaluated. For example, the peak flow for an atmospheric tank would be the greater of the booster pump(s) or well pump(s) capacity. The peak flow for a pressure tank would be the greater of booster pump(s) capacity or the formula $Q_{pk} = 11.4 * (N^{0.544})$.

3. Select a lowest free chlorine residual (C) value between 0.5 and 1.5 mg/L, with calculations starting on the lower end and following an iterative process until CT requirements are met.

4. Evaluate CT credit from atmospheric storage. The minimum operating volume should be based on the lowest expected water level (actual pump "on" and "off" levels should be used to compute effective storage volume). The appropriate baffling factor should be applied to the effective volume. Use guidance in attached worksheet, for assigning a baffling factor (adopted from Table L-8 of the *Waterworks Regulations)*. If CT requirements are met go to step 7, otherwise proceed to the next step.

5. Evaluate CT credit from pressure storage. Typically only 1/3 of pressure storage is available Typical baffling factor would be 0.1 for inlet/outlet on the same end ("unbaffled") , or 0.3 for separate inlet/outlet on opposite ends of the tank ("poorly baffled"). If CT requirements are met go to step 7, otherwise proceed to the next step.

6. Evaluate CT credit from pipelines. Any CT credit shall be prior to the entry point sample tap, to avoid collecting a sample out in the distribution system.

7. Compare CT_{credit} to $CT_{required}$. If current facilities do not provide for the required CT, then waterworks may follow established procedures to obtain a construction permit for modifications.

8. Complete the Disinfectant Residual Achievable worksheet. The chlorine feed rate required, Q_{pump}, must be less than 80% of the capacity of the existing pump.

APPENDIX C (cont.)
4-LOG VIRUS TREATMENT EVALUATION FORM

INSTRUCTIONS (CONT.)

Baffling Factor, per *Waterworks Regulations*

Baffling Condition	Baffling Factor = T_{10}/T	Baffling Description
Unbaffled (mixed flow)	0.1	None, agitated basin, very low length to width ratio, high inlet and outlet flow velocities
Poor	0.3	Single or multiple unbaffled inlets and outlets, no intrabasin baffles
Average	0.5	Baffled inlet or outlet with some intra-basin baffles
Superior	0.7	Perforated inlet baffle, serpentine or perforated intra-basin baffles, outlet weir or perforated launders
Excellent	0.9	Serpentine baffling throughout basin, very high length to width ratio
Perfect	1.0	Very high length to width ratio (pipeline flow), perforated inlet, outlet and intra-basin baffles

APPENDIX C (cont.)
4-LOG VIRUS TREATMENT EVALUATION FORM

4-LOG VIRUS TREATMENT EVALUATION FORM

Evaluator:		PWSID No.:	
Date:		Waterworks Name:	

GROUNDWATER SYSTEMS : 4-LOG VIRUS TREATMENT EVALUATION For waterworks that disinfect with gaseous chlorine or sodium hypochlorite			
Step 1. Determine CT Credit			
Lowest free chlorine residual, C			mg/L
CT from Atmospheric Storage			
1	Minimum Operating Volume, V		gal
2	Peak hourly flow, Q_{pk}		gpm
3	Theoretical Contact Time, $T=V/Q_{pk}$		minutes
4	Baffling Factor, BF		
5	Effective Contact Time, $T_{10} = T * BF$		minutes
6	$CT_{atm\text{-}storage} = C * T_{10}$		min-mg/L
CT from Pressure Storage			
1	Minimum Operating Volume, V		gal
2	Peak hourly flow, Q_{pk}		gpm
3	Theoretical Contact Time, $T=V/Q_{pk}$		minutes
4	Baffling Factor, BF		
5	Effective Contact Time, $T_{10} = T * BF$		minutes
6	$CT_{press\text{-}storage} = C * T_{10}$		min-mg/L
CT from Pipelines			
1	Pipe length, L		feet
2	Pipe Diameter, D		inch
3	Pipe Volume, V = L * 3.14 * (D/24)^2 * 7.48		gal
4	Minimum pipe detention time, $T_{pipe} = V / Q_{pk}$		minutes
5	$CT_{pipe} = C * T_{pipe}$		min-mg/L
Total $CT_{credit} = CT_{pipe} + CT_{atm\text{-}storage} + CT_{press\text{-}storage}$			min-mg/L
Step 2. Determine $CT_{required}$			
10	Coldest water temperature, t = **(if unknown, use default value = 10 ^{o}C)**		^{o}C
On Table below Line A – circle value of coldest water temperature. Line B – circle corresponding = $CT_{required}$			
Step 3. Compare Total CT credit : $CT_{required}$			
Total $CT_{credit} \geq CT_{required}$? (circle answer)		YES	NO

APPENDIX C (cont.)
4-LOG VIRUS TREATMENT EVALUATION FORM

CT Values for 4-Log Virus Inactivation by Free Chlorine, pH = 6.0 – 9.0										
A	Temp ^{o}C	1	2	3	4	5	6	7	8	9
B	4-Log Inactivation	11.6	10.7	9.8	8.9	8.0	7.6	7.2	6.8	6.4

CT Values for 4-Log Virus Inactivation by Free Chlorine, pH = 6.0 – 9.0										
A	Temp ^{o}C	10	11	12	13	14	15	16	17	18
B	4-Log Inactivation	6.0	5.6	5.2	4.8	4.4	4.0	3.8	3.6	3.4

DISINFECTANT RESIDUAL ACHIEVABLE

The following worksheet determines if the required free chlorine concentration can be achieved with the existing facilities to obtain 4-Log Virus treatment.

Free Chlorine Residual required, $C_{residual}$ Measurement location: (Typically at the Entry Point sample tap)		mg/L
Chlorine demand, C_{demand} (assume 0.2 mg/L unless actual data is provided)		mg/L
Peak hourly flow, Q_{pk}		gpm
Chlorine feed capacity evaluation: Chlorine solution concentration, C_{soln} Chlorine feed required based on minimum CL residual, Q_{pump} $Q_{pump} = ((Q_{pk} * 1440) * (C_{residual} + C_{demand})) / C_{soln}$		mg/L gpd
Can the waterworks provide the required minimum chlorine dosage? (Q_{pump} must be less than 80% of existing pump capacity)	YES	NO
Is the minimum chlorine residual concentration acceptable to customers?	YES	NO

APPENDIX D
4-LOG NOTIFICATION LETTER

<<date>>

Subject: <<County>>
Water- <<Waterworks Name>>
PWSID No.

«Owner Name»
«Address»
«Address»

Dear «Owner Name»:

We have evaluated the performance of the chlorine disinfection facilities of your waterworks relative to meeting 4.0-log virus inactivation described in the Groundwater Rule (GWR). The waterworks appears to provide the required 4.0-log virus inactivation, as it is currently configured and operated. A copy of our completed waterworks performance evaluation form is attached for your information. The evaluation was based on the peak flow through the disinfection process, and an assumed minimum water temperature value of 10°C (76°F).

In order to consistently achieve 4-log inactivation of virus your waterworks will need to be operated and monitored to assure that the following finished water quality is produced:

- Minimum Free Residual Chlorine Concentration, measured at the entry point sample tap – *{insert here}*mg/L
- Minimum/Maximum pH Range: 6.0 – 9.0

Please note that the minimum chlorine residual specified above is for meeting the 4.0-log inactivation requirements for viruses. A greater chlorine dosage may be necessary to maintain acceptable chlorine residuals and bacteriological quality in the distribution system than is required to provide 4-log virus inactivation.

Waterworks population > 3,300 or population <=3,300 who choose this option:
You must continuously monitor and record the residual disinfectant concentration at the approved location each day that you serve water from the well(s) to the public. The daily lowest residual disinfectant concentration must be reported on the monthly operations report submitted to this office.

APPENDIX D (cont.)
4-LOG NOTIFICATION LETTER

Waterworks population <=3,300:
You must collect at least one grab sample from the entry point sample tap, during the hour of peak flow, each day that you serve water from the well(s) to the public. The daily grab sample result must be reported on the monthly operations report submitted to this office.

The operators of your waterworks will need to closely monitor the entry point free chlorine residual. Failure to maintain adequate chlorine residual may result in a Treatment Technique violation of the *Waterworks Regulations*. Enclosed is a revised monthly operation report(MOR), which will be reviewed by this Office to evaluate compliance with the virus inactivation Treatment Technique. Use of the enclosed MOR must begin on (*month*, *year),* but you may start to use it immediately.

Your cooperation during our evaluation is appreciated. Should you have any questions, please feel free to contact _____, District Engineer, or me.

Sincerely,

Engineering Field Director

<<engr initials:typist>>
cc: <<county>> County Health Department, Attn: <<Director>>

APPENDIX E
LETTER FOR CONFIRMED *E. COLI* & CORRECTIVE ACTION PLAN

<<date>>

NOTIFICATION OF TREATMENT TECHNIQUE REQUIREMENT

Subject: <<County>>
Water- <<Waterworks Name>>
PWSID No.

«Owner Name»
«Address»
«Address»

Dear «Owner Name»:

According to Virginia Department of Health records your well *(spring)* water tested positive for *E. coli* bacteria in (two- *state total number)* raw water samples collected on *{dates}*. Because your well (spring) has confirmed *E. coli* contamination, federal law requires you to complete the following actions:

Treatment Technique Requirements / Corrective Action Plan**:**

Section 141.403(a)(4) of the federal *Groundwater Rule* requires you to consult with this Office to develop a Corrective Action Plan (CAP) that will resolve the confirmed *E. coli* contamination. Enclosed is a proposed CAP for you to review, sign, and return if acceptable no later than <insert date of letter plus 30 days>. If you wish to revise the CAP please contact this Office immediately.

Upon completion of each action item, you must report the status to this Office within 30 days after the completion date. Once the CAP has been fully implemented, contact this Office to schedule an inspection.

Failure to respond by the above deadlines may constitute non-compliance with the federal *Groundwater Rule* that was established to protect public health, and formal enforcement action may be initiated to compel compliance.

Public Notification:

On *{insert date}*, I (or *other individual's name* of this office) talked with you by telephone about the public notification requirements. You were advised to notify your customers of the confirmed *E. coli* contamination in your well within 24 hours. We provided a sample written notice for you to distribute to your customers. A copy of the draft public notice is enclosed. The federal *Groundwater Rule* characterizes this as a Tier 1 situation.

APPENDIX E (cont.)
LETTER FOR CONFIRMED *E. COLI* & CORRECTIVE ACTION PLAN

Public Notice Confirmation**:**

Within ten (10) days of distribution of the public notice to your customers, you must provide this Office with a copy of the notice you distributed and a signed certification of the distribution completion date and methods used. A sample certification form is enclosed for your use. Failure to distribute the public notice and report to the Virginia Department of Health may be a violation of the *Waterworks Regulations*.

Sincerely,

District Engineer

Enclosure(s): 1. Corrective Action Plan
2. Public Notice
3. Public Notice Certification form

cc: <<County>> County Health Department, Attention, Name of Health Director, Director
<<County>> County Administrator

APPENDIX E (cont.)
LETTER FOR CONFIRMED *E. COLI* & CORRECTIVE ACTION PLAN

CORRECTIVE ACTION PLAN

Section 141.403 of the federal Groundwater Rule requires you to implement the following interim and corrective actions because your groundwater source has confirmed *E. coli* contamination.

A. INTERIM ACTION REQUIREMENTS

1. Discontinue use of the groundwater source until such time as the Corrective Action Plan has been fully implemented, or

2. If the well must remain in service because discontinuing use of the source is not a viable option:

   a. The waterworks owner shall issue a Boil Water Advisory through the public notification procedure in 12 VAC 5-590-540 of the *Waterworks Regulations* until such time as the Virginia Department of Health approved 4-log virus treatment facilities have been installed and are operational.

   b. Provide emergency chlorine disinfection during the interim period as follows: the free chlorine residual disinfectant concentration at the entry point to the distribution system shall not be less than 2.0 mg/L.

   c. Chlorine residual in the distribution system shall not be less than 0.2 mg/L.

B. CORRECTIVE ACTION REQUIREMENTS

The following corrective actions and schedules must be followed. As you complete each action item you are required to report in writing the status to the VDH.

ACTION ITEM	START DATE	COMPLETION DATE
Submit plans and specifications prepared by a Virginia licensed Professional Engineer for a continuous chlorination system capable of meeting the 4-log virus inactivation requirements.	Immediately	Target 45 days
Complete construction and have in operation the approved treatment facilities.	Upon issuance of construction permit	Target 120 days from construction permit issuance

I agree to fully implement the above interim and corrective actions to bring my waterworks into compliance with the Treatment Technique requirement of the federal *Groundwater Rule.*

_____

Waterworks Owner (Signature) Date

APPENDIX F
LETTER FOR SIGNIFICANT DEFICIENCY & CORRECTIVE ACTION PLAN

«Date»

NOTIFICATION OF TREATMENT TECHNIQUE REQUIREMENT

Subject: <<County>>
Water- <<Waterworks Name>>
PWSID No.

«Owner Name»
«Address»
«Address»

Dear «Owner Name»:

On *{date}*, {*name of the inspector*} made a sanitary survey of your waterworks. Enclosed is a copy of the written survey report for your review.

The following Significant Deficiency was identified during this inspection:
{state deficiency here}

Because your waterworks has an identified Significant Deficiency, you must meet the Treatment Technique required by the federal *Groundwater Rule § 141.403*. The Rule requires you to consult with this Office to develop a Corrective Action Plan (CAP) that will satisfactorily correct this Significant Deficiency.

(If ODW issues CAP):
Enclosed is a proposed CAP for you to review, sign, and return if acceptable no later than <insert date 30 days after date of letter>. If you wish to make changes to the CAP please contact this Office immediately. You are required to notify this Office within 30 days of completion of each action item. Once all of the actions listed in the CAP have been completed, this Office must conduct a follow-up inspection to verify elimination of the Significant Deficiency in accordance with the CAP.

(If waterworks owner generates CAP):
You are required to submit a written Corrective Action Plan (CAP) to resolve this Significant Deficiency to this Office for review and approval no later than <Insert date 30 days from date of letter>. The CAP must outline the steps necessary to correct the Significant Deficiency, and be fully implemented within 120 calendar days from the date of this letter.

APPENDIX F (cont.)
LETTER FOR SIGNIFICANT DEFICIENCY & CORRECTIVE ACTION PLAN

You are required to notify this Office within 30 days of completion of each action item. Once the actions listed in the CAP have been completed, this Office must conduct a follow-up inspection to verify elimination of the Significant Deficiency in accordance with the CAP.

Failure to respond by the above deadlines may constitute non-compliance with the federal *Groundwater Rule* that was established to protect public health, and formal enforcement action may be initiated to compel compliance.

If you have questions, please do not hesitate to contact me.

Sincerely,

District Engineer

Enclosure(s): 1. Sanitary Survey Report
2. Corrective Action Plan

cc: <<County>> County Health Department, Attention, Name of Health Director, Director
<<County>> County Administrator

APPENDIX F (cont.)
LETTER FOR SIGNIFICANT DEFICIENCY & CORRECTIVE ACTION PLAN

CORRECTIVE ACTION PLAN

Section 141.403 of the federal Groundwater Rule requires the waterworks owner to implement the following (interim and) corrective actions because the groundwater source has been found to have the following significant deficiency:

State deficiency here……

A. INTERIM ACTION REQUIREMENTS

Include interim action requirements as necessary

CORRECTIVE ACTION REQUIREMENTS

The following corrective actions and schedules must be followed. As you complete each action item you are required to report in writing the status to the Virginia Department of Health.

ACTION ITEM	START DATE	Completion date
Include corrective action item(s) necessary to correct the significant deficiency	Immediately	Target 120 days from CAP issuance

I agree to fully implement the above (interim and) corrective actions to bring my waterworks into compliance with the Treatment Technique requirement of the federal *Groundwater Rule.*

Waterworks Owner (Signature) Date

APPENDIX G
SPECIAL PERMIT REQUIREMENTS FOR 4-LOG INACTIVIATION

SPECIAL PERMIT REQUIREMENTS
PWSID No. *{permit number}*

These permit requirements are issued by the State Board of Health of the Commonwealth of Virginia, under authority granted in the *Code of Virginia* Title 32.1. Failure to comply with these requirements shall constitute a violation of this Permit.

The following operational control conditions and reporting requirements for the disinfection unit process are imposed:

1. In order to consistently achieve 4-Log inactivation of virus, the minimum free residual chlorine concentration, measured at the entry point sample tap for *{name of source}* must be maintained at *{insert}* mg/L.

2. *Waterworks population > 3,300 or populations <= 3,300 choosing this option:*

   The free chlorine residual concentration must be continuously monitored and recorded at the approved entry point location to the distribution system each day that you serve water from *{name of source}* to the public. The daily lowest free chlorine residual concentration must be reported on the monthly operations report submitted to the *{name}* Field Office.

3. *Waterworks population <= 3,300*

   The free chlorine residual concentration must be measured and recorded on a grab sample collected at the approved entry point location to the distribution system during the hour of maximum peak flow each day that you serve water from *{name of source}* to the public. The daily grab sample chlorine residual concentration must be reported on the monthly operations report submitted to the *{name}* Field Office.

4. The monthly operations report must be submitted to the *{name}* Field Office no later than the 10th day of the month following the month in which data is reported.

Approved: _____P.E.
Director, Office of Drinking Water
For the State Health Commissioner pursuant to VA Code § 2.2-604

Date: _____