

STATE OF COLORADO

Bill Ritter, Jr., Governor
James B. Martin, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

July 29, 2010

Certified Mail Number: 7009 1680 0000 2094 4855

PWSID# CO-0160450
Bruce L. Rieger, Registered Agent
Rosewood Hills Property and Homeowners Association
P.O. Box 5222
Woodland Park, Colorado 80866

RE: Service of Drinking Water Enforcement Order, Number: DC-100729-1

Dear Mr. Rieger:

Rosewood Hills Property and Homeowners Association is hereby issued the enclosed Enforcement Order (the "Order"). This Order is issued by the Colorado Department of Public Health and Environment, Water Quality Control Division (the "Department") pursuant to the authority given to the Department by §25-1.5-203 of the Colorado Revised Statutes ("C.R.S."). The Department bases this Order upon findings that the Rosewood Hills Property and Homeowners Association violated the *Colorado Primary Drinking Water Regulations* (the "Regulations") as described in the enclosed Order.

As a recipient of an Order, Rosewood Hills Property and Homeowners Association may request a formal hearing to contest the Order in accordance with the Regulations, 5 CCR 1003-1, §1.6.7(g). Requests for such a hearing shall be filed in writing with the Department within thirty (30) calendar days after service of the Order. Such requests, at a minimum shall contain the information specified in 5 CCR 1003-1, §1.6.7(g), and 5CCR 1002-21, §21.4(B)(2). Hearings on Orders shall be held in accordance with applicable provisions of the State Administrative Procedure Act, Article 4 of Title 24, C.R.S. and the procedural rules promulgated in 5 CCR 1002-21.

This action could result in the imposition of administrative or civil penalties. The Department or a State District Court is authorized pursuant to §25-1-114.1, C.R.S. to impose a penalty of up to \$1,000 per violation per day. Please be advised that the Department is continuing its investigation into this matter and the Department may identify supplementary violations that warrant amendments to this Order or the issuance of additional enforcement actions.

Should you or Rosewood Hills Property and Homeowners Association desire to informally discuss this matter with the Department or if you have any questions regarding the Order, please don't hesitate to contact Sean Scott at (303) 692-3258 or by electronic mail at sean.scott@state.co.us.

Sincerely,



Russell Zigler, Legal Assistant
Enforcement Unit
Compliance Assurance Section
WATER QUALITY CONTROL DIVISION

Enclosure

- cc: Teller County Public Health Department
Richard Stasi, Operator, P.O. Box 5222, Woodland Park, CO 80866-5222
- cc: Joseph Talbott, Engineering Section, CDPHE
Dick Parachini, Watershed Program, CDPHE
Betsy Beaver, Facility Operators Program, CDPHE
Shawn McCaffrey, EPA Region VIII
Michael Beck, Financial Solutions Unit, CDPHE



COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
WATER QUALITY CONTROL DIVISION

ENFORCEMENT ORDER

NUMBER: DC-100729-1

IN THE MATTER OF: ROSEWOOD HILLS PROPERTY & HOMEOWNERS ASSOCIATION
PUBLIC WATER SYSTEM IDENTIFICATION NUMBER: CO-0160450
TELLER COUNTY, COLORADO

Pursuant to the authority vested in the Colorado Department of Public Health and Environment (the "Department") by §25-1-109 and §25-1.5-203 of the Colorado Revised Statutes ("C.R.S."), which authority is implemented through the Department's Water Quality Control Division (the "Division"), the Division hereby makes the following findings and issues the following Enforcement Order:

GENERAL FINDINGS

1. The Rosewood Hills Property & Homeowners Association ("Rosewood Hills PHOA") owns and/or operates a drinking water system located at or near the Town of Woodland Park, Colorado, in Teller County, Colorado (the "System").
2. The Rosewood Hills PHOA is a person as defined by 5 CCR 1003-1, §1.5.2(98).
3. The Rosewood Hills PHOA is a supplier of water within the meaning of §25-1.5-201(2), C.R.S., and its implementing regulation, 5 CCR 1003-1, §1.5.2(128).
4. The System is a public water system as defined by §25-1.5-201(1), C.R.S., and its implementing regulation, 5 CCR 1003-1, §1.5.2(107).
5. The Public Water System Identification Number ("PWSID") assigned to the System by the Department is PWSID #: CO-0160450.
6. Pursuant to 5 CCR 1003-1, §1.2, the System is subject to the *Colorado Primary Drinking Water Regulations* (the "Regulations"), which were adopted pursuant to §25-1.5-203, C.R.S.

7. The Rosewood Hills PHOA provides piped water for human consumption from the System to at least fifteen (15) service connections used by year-round residents of the area served by the System and/or regularly serves at least twenty-five (25) year-round residents. The System is therefore classified as a “community water system” as defined by 5 CCR 1003-1, §1.5.2(15).
8. The System’s source of water is groundwater as defined by 5 CCR 1003-1, §1.5.2(63).

First Violation

(Failure to Comply with the Maximum Contaminant Levels for Fluoride)

9. Pursuant to 5 CCR 1003-1, §2.2, Table 2-3(9), all community public water systems are subject to the fluoride maximum contaminant level of 4.0 milligrams per liter (mg/L).
10. Pursuant to 5 CCR 1003-1, §6.1.5(d)(1), the System must monitor for fluoride by taking one sample at each sampling point, as defined in 5 CCR 1003, §6.1.5(b)(1), during each compliance period.
11. Pursuant to 5 CCR 1003-1, §6.1.5(d)(8), systems that exceed the maximum contaminant level for fluoride, as calculated in accordance with 5 CCR 1003-1, §6.1.3(a), shall monitor quarterly beginning in the next quarter after the violation occurred.
12. Pursuant to 5 CCR 1003-1, §6.1.3(a)(1), for systems which are conducting monitoring at a frequency greater than annual, compliance with the maximum contaminant level for fluoride is determined by a running annual average based on data from the most recent four consecutive quarters at any sampling point.
13. Pursuant to 5 CCR 1003-1, §6.1.2 and §1.6.4(a), the System shall report to the state the results of any fluoride test measurements or analyses required by the *Colorado Primary Drinking Water Regulations* within (1) the first ten calendar days following the month in which the result is received, or (2) the first ten calendar days following the end of the required monitoring period, as stipulated by the Department, whichever of these is shorter.
14. From calendar year 2006 to present, monitoring data submitted to the Division from the System establish the following fluoride running annual averages for the System:

Fluoride (in mg/L) at Sampling Point 004				Running Annual Average (in mg/L)
3 rd Q 2006 4.5	4 th Q 2006 4.8	1 st Q 2007 4.9	2 nd Q 2007 4.3	4.6
4 th Q 2006 4.8	1 st Q 2007 4.9	2 nd Q 2007 4.3	3 rd Q 2007 4.3	4.6
1 st Q 2007 4.9	2 nd Q 2007 4.3	3 rd Q 2007 4.3	4 th Q 2007 4.8	4.6
2 nd Q 2007 4.3	3 rd Q 2007 4.3	4 th Q 2007 4.8	1 st Q 2008 4.5	4.5
3 rd Q 2007 4.3	4 th Q 2007 4.8	1 st Q 2008 4.5	2 nd Q 2008 4.8	4.6
4 th Q 2007 4.8	1 st Q 2008 4.5	2 nd Q 2008 4.8	3 rd Q 2008 5.2	4.8
1 st Q 2008 4.5	2 nd Q 2008 4.8	3 rd Q 2008 5.2	4 th Q 2008 5.7	5.1
2 nd Q 2008 4.8	3 rd Q 2008 5.2	4 th Q 2008 5.7	1 st Q 2009 4.4	5.0
3 rd Q 2008 5.2	4 th Q 2008 5.7	1 st Q 2009 4.4	2 nd Q 2009 5.2	5.1
4 th Q 2008 5.7	1 st Q 2009 4.4	2 nd Q 2009 5.2	3 rd Q 2009 4.7	5.0
1 st Q 2009 4.4	2 nd Q 2009 5.2	3 rd Q 2009 4.7	4 th Q 2009 5.2	4.9
2 nd Q 2009 5.2	3 rd Q 2009 4.7	4 th Q 2009 5.2	1 st Q 2010 4.5	4.9
3 rd Q 2009 4.7	4 th Q 2009 5.2	1 st Q 2010 4.5	2 nd Q 2010 4.2	4.7

15. Pursuant to 5 CCR 1003-1, §6.1.3(a)(1), for systems which are conducting monitoring at a frequency greater than annual, if the running annual average at any sampling point is greater than the maximum contaminant level then the system is out of compliance.
16. Rosewood Hills PHOA's failure to comply with the maximum contaminant level for fluoride constitutes violations of 5 CCR 1003-1, §2.2, Table 2-3(9).

COMPLIANCE REQUIREMENTS

Based upon the foregoing factual and legal determinations and pursuant to 5 CCR 1003-1, §1.6.7, the Rosewood Hills PHOA is hereby ordered to:

17. Immediately comply with the *Colorado Primary Drinking Water Regulations*, 5 CCR 1003-1, Articles 1 through 13.

Further, the Division hereby orders the Rosewood Hills PHOA to comply with the following specific terms and conditions of this Enforcement Order.

18. In order to ensure long-term compliance with the *Colorado Primary Drinking Water Regulations*, specifically including the fluoride maximum contaminant level (Article 6) for public water supplies, the Rosewood Hills PHOA shall evaluate and upgrade, as needed, the System's water sources and/or treatment processes in accordance with the following schedule:
 - a. By September 17, 2010, retain a qualified Professional Engineer (licensed in Colorado and experienced in drinking water systems) to evaluate and recommend treatment technologies or alternate water sources to the Rosewood Hills PHOA to ensure compliance with the maximum contaminant level for fluoride.
 - b. By October 17, 2010, conduct a consultation with the System's consulting engineer, the Department assigned District Engineer for the System, and an authorized representative from the System to discuss the preliminary engineering evaluation and recommendations for treatment technology the Rosewood Hills PHOA will use to ensure compliance with the maximum contaminant level for fluoride.
 - c. By June 30, 2011, submit Final Design Plans and Specifications for the System improvements for Department review and approval in accordance with the *State of Colorado Design Criteria for Potable Water Systems*.
 - i. The Final Design Plans and Specifications submittal package must include specifications for treatment equipment and/or chemical additives that come in contact with the water that indicate ANSI standards 60 and 61 are met (NSF certification).
 - ii. The Final Design Plans and Specifications must include a process flow schematic of the distribution system from raw water sources to points of use, including flow rates, treatment facilities, storage tanks, and all service connections supplied by the sources. Alternative treatment locations for the selected treatment process or processes must be evaluated with a recommended location selection. The process flow schematic information and evaluation must be included to ensure all water from the System is treated.
 - iii. The Final Design Plans and Specifications must include a proposal for management of residuals from the treatment technology selected.

- iv. The Final Design Plans and Specifications submittal package must include design calculations showing the proposed treatment system is properly sized and chlorine contact times can be met for expected flow rates.
- v. If an alternate water source is proposed, submit for Department review and comment detailed engineering plans and specifications for the source, including a description of the alternate water source along with a copy of the laboratory analyses supporting the suitability of the alternate water source.

{Please note that, prior to construction, the Department must give final approval to any modifications to the System's water source or treatment process. The Department will not perform a detailed review and final approval of any proposed modifications until the final design plans and specifications have been received pursuant to paragraph 18(c)(i)-(v) above.}

- d. By November 30, 2011, complete construction/implementation of the Department approved System improvements to ensure long-term compliance with the maximum contaminant level for fluoride.
 - i. If the Department requires a pilot study of the selected treatment technology prior to approval, then the pilot study and approval must be completed before the November 30, 2011, construction/implementation deadline.
 - e. By January 30, 2012, submit the Professional Engineer's Certification that the System improvements to comply with the maximum contaminant level for fluoride were constructed/installed as approved by the Department.
19. By no later than August 31, 2010, the Rosewood Hills PHOA shall complete an evaluation to determine appropriate interim measures to ensure that the System is providing the best possible quality of water available until the System implements improvements to ensure long-term compliance with the fluoride maximum contaminant level. The Rosewood Hills PHOA shall submit a written report of the results of this evaluation to the Division for review and comment. Implementation of the interim measures identified by the Rosewood Hills PHOA shall become a condition of this Enforcement Order unless notified by the Division, in writing, that alternate or additional interim measures are appropriate. If the Division imposes alternate or additional interim measures, they shall also become a condition of this Enforcement Order.

20. By no later than December 31, 2010, and every three (3) months thereafter, the Rosewood Hills PHOA shall issue a public notice in accordance with 5 CCR 1003-1, Article 9.2, for each fluoride maximum contaminant level violation identified in this Enforcement Order until the Rosewood Hills PHOA has effectively addressed and returned to compliance with the fluoride maximum contaminant level outlined in 5 CCR 1003-1, §2.2, Table 2-3(9). Within ten (10) calendar days of completion of each required public notification, the Rosewood Hills PHOA shall submit to the Department, along with the mandatory Public Notification certification of delivery, a representative copy of notices distributed, published, posted, and/or made available to the persons served by the system and/or to the media. *(Attached are copies of procedures and forms to assist you with the public notification requirements.)*
21. Rosewood Hills PHOA shall submit "System Improvement Project - Progress Reports" to the Division every ninety (90) calendar days. The first report shall be submitted to the Division by September 15, 2010. At a minimum, each report shall clearly indicate the status of the system evaluation/improvement project at the time the report is filed and outline activities to be undertaken within the next ninety (90) calendar days. These reports shall be required until the System has demonstrated reliable and consistent compliance with the fluoride maximum contaminant level outlined in 5 CCR 1003-1, §2.2, Table 2-3(9).
22. All documents submitted under this Order shall use the same titles as stated in the Order and shall reference both the Order number and the paragraph number pursuant to which the document is required.

NOTICES AND SUBMITTALS

23. For all documents, plans, records, reports and replies required to be submitted by this order, Rosewood Hills PHOA shall submit an original and one copy (electronic is preferred) to the Division at the following address:

Colorado Department of Public Health and Environment
Water Quality Control Division / WQCD-B2-CAS
Compliance Assurance Section
Attention: Sean Scott
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

Phone: 303-692-3258
Email: sean.scott@state.co.us
Fax: (303) 782-0390

(For any facsimile transmittals, please include a cover sheet addressed to Mr. Sean Scott.)

24. All reports, notices, summaries, and certifications required to be submitted to the Department by the public water system must bear the original signature of the owner or the owner's authorized representative.

NOTICE OF COMPLETION

25. Rosewood Hills PHOA shall submit a Notice of Completion to the Division upon satisfactory completion of all requirements of this Enforcement Order. The Division shall either accept or reject the Notice of Completion in writing. If the Division rejects the Notice of Completion, it shall include in its notice a statement identifying the requirements that the Division considers incomplete or not satisfactorily performed and a schedule for completion. If Rosewood Hills PHOA wishes to dispute the Division's rejection of its Notice of Completion, it shall, within fifteen (15) calendar days of receipt of the Division's rejection, submit a written statement as to its belief of full compliance, addressing in detail all concerns the Division raised in the rejection letter to the System's Notice of Completion.

PRIOR APPROVAL REQUIRED

26. Pursuant to 5 CCR 1003-1, §1.11.2, no person shall commence construction of any new waterworks, or make improvements to or modify the treatment process of an existing waterworks, or initiate use of a new source, until plans and specifications for such construction, improvements, modifications or use have been submitted to, and approved by, the Department. A Professional Engineer registered in the State of Colorado shall design all treatment systems serving a community water supply. The Department shall grant such approval when it finds that the proposed facilities are capable of complying, on a continuous basis, with all applicable laws, standards, rules and regulations.

POTENTIAL ADMINISTRATIVE/CIVIL AND CRIMINAL PENALTIES

27. You are also advised, pursuant to §25-1-114.1, C.R.S., that violators of the Regulations or final Enforcement Orders issued by the Department are subject to civil or administrative penalties of up to one thousand dollars (\$1,000) per violation per day, to be imposed by the Department or a State District Court. Further, pursuant to §25-1-114(4), C.R.S., any person, association, or corporation, or the officers thereof, who violates, disobeys, or disregards any provision of the Regulations or an Enforcement Order is guilty of a misdemeanor and, upon conviction thereof, shall be punished by a fine of not more than one thousand dollars (\$1,000), or by imprisonment in the county jail for not more than one (1) year, or by both such fine and imprisonment and, in addition to such fine and imprisonment, shall be liable for any expense incurred by health authorities in removing any nuisance, source of filth, or cause of sickness. By virtue of issuing this Enforcement Order, the Department has not waived its right to bring an action for administrative, civil or criminal penalties and may bring such action in the future.

REQUEST FOR HEARING OR APPEAL

28. You are further advised, pursuant to 5 CCR 1003-1, §1.6.7(g), that a recipient of an Enforcement Order may request a hearing contesting such order. Requests for such a hearing shall be filed in writing with the Department within thirty (30) calendar days after service of the order. Such requests, at a minimum, shall contain the information specified in 5 CCR 1003-1, §1.6.7(g), and 5 CCR 1002-21, §21.4(B)(2). Hearings on Enforcement Orders shall be held in accordance with applicable provisions of the State Administrative Procedure Act, Article 4 of Title 24, C.R.S., and the procedural rules promulgated in 5 CCR 1002-21.

ADDITIONAL ACTION

29. You are further advised that under §25-1-114.1(1), C.R.S., the Department may institute a civil action against any person who violates a final Enforcement Order of the Department issued for violation of any minimum general sanitary standard or regulation adopted pursuant to §25-1.5-203, C.R.S.
30. Additionally, the Department may request the Attorney General to seek a temporary restraining order or permanent injunction to prevent or abate any violation of a minimum general sanitary standard or regulation adopted pursuant to §25-1.5-203, C.R.S. Further information concerning the aforementioned action is contained in §25-1-114.1(3), C.R.S.

Issued at Denver, Colorado, this 29th day of July, 2010.

FOR THE COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT



Lori M. Gerzina, Section Manager
Compliance Assurance Section
Water Quality Control Division



Tier 2
Drinking Water Public Notification
Certificate of Delivery Form

Colorado Department
of Public Health
and Environment

System Name: _____

PWSID CO0 _____

Reason for Notice: (description of violation or situation) _____

Date of Violation Letter: _____

I hereby affirm that Public Notification for the violation or situation identified above has been provided to consumers and any consecutive water systems in accordance with the delivery, content, and format requirements of the *Colorado Primary Drinking Water Regulations*, section 9.2. I affirm that future requirements for notifying new billing units will be met. I also understand that this notice may need to be repeated in accordance with section 9.2 and I must submit this form again with each repeated notice.

Public Notice Distributed on: (date) _____

Check all distribution methods used to reach all consumers:

- Direct delivery method (includes hand delivery and U.S. mail) – required for community water systems
- Continuously posted: (list locations) _____
- Television, Radio, and/or Newspaper: _____
- Delivery of multiple copies to hospitals, apartment buildings, schools, or other community centers
- E-mail
- Other method approved by CDPHE: _____

List all consecutive water systems (water systems that purchase water from your system) that notice was delivered to:

Signature of owner or owner's legal representative

Date Signed

Printed name of owner or owner's legal representative

Phone number: _____

Mailing Address: _____

Attach copies of each public notice and send to:

CDPHE-WQCD

ATTN: CADM-Public Notification

Or Fax to: (303) 758-1398

4300 Cherry Creek Drive South

Denver, CO 80246-1530

Tier 2 Public Notice Instructions

Delivery Requirements

Tier 2 public notices are required for violations and situations that can have potential serious adverse effects on human health. Water systems must provide public notice to persons served as soon as practical but within 30 days after learning of the violation. The water system must issue a repeat notice every three months for as long as the violation or situation persists. **Public water systems that provide water to other water systems must deliver public notices to the owners or operators of all receiving water systems (consecutive water systems) (9.2.1(c)).**

Community systems must use at least one of the following delivery methods (9.2.3(c)(1)):

- ✓ Hand delivery or other direct delivery method
- ✓ Mail (can be included with the bill)

Non-community systems must use at least one of the following delivery methods (9.2.3(c)(2)):

- ✓ Posting in conspicuous locations
- ✓ Mail, hand delivery, or other direct delivery method to each user (where known)

In addition, both community and non-community systems must use another method reasonably calculated to reach others if they would not be reached by the first method. Such methods could include newspapers, e-mail, or delivery to community organizations. If you post the notice, it must remain posted until the violation is resolved, but no less than seven days.

Ten Required Elements of a Public Notice (9.2.5)

1. Description of the violation or situation including contaminant(s) of concern and (as applicable) the contaminant level(s).
2. When the violation or situation occurred.
3. Any potential adverse health effects from the violation or situation, including any standard language provided in the rule. The health effects language may not be modified.
4. The population at risk; including subpopulations particularly vulnerable if exposed to the contaminant in their drinking water.
5. Whether alternate water supplies should be used.
6. What actions consumers should take, including when to seek medical help, if known.
7. What the system is doing to correct the violation or situation (corrective action).
8. When the system expects to return to compliance or resolve the situation.
9. Contact information: name, business address, and phone number of the water system owner or the owner's legal representative of the PWS that can provide additional information.
10. A statement encouraging notice recipients to distribute the notice to other persons served using the following standard language from the rule. This statement may not be modified: "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 public places or by distributing copies by hand."

Corrective Actions

In the notice, describe corrective actions the water system took or is taking. Listed below are some steps commonly taken by water systems with MCL violations. Choose the appropriate language, or develop your own:

- ✓ We are working with [local/state agency] to evaluate the water supply and researching options to correct the problem. These options may include treating the water to remove [contaminant] or connecting to [system]'s water supply.
- ✓ We have stopped using the contaminated well. We have increased pumping from other wells, and we are investigating drilling a new well.
- ✓ We will increase the frequency at which we test the water for [contaminant].
- ✓ We have since taken samples at this location and had them tested. They show that we meet the standards.

After Issuing the Notice

Make sure to send WQCD copies of all public notice(s) and a Tier 2 Certificate of Delivery Form within ten days after issuing the notice.

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

(System Name) _____
Has Elevated Levels of Fluoride

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what happened, what you should do, and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Testing results we received on (date) _____ show that our system exceeds the maximum contaminant level (MCL) for fluoride. The running annual average level of fluoride in samples taken during the last year was (level) _____ milligrams per liter (mg/L). The MCL for fluoride is that the average of samples taken over the last year may not exceed 4.0 mg/L.

What does this mean? What should I do?

- ✓ **Children under the age of nine should use an alternative source of water that is low in fluoride.** In addition, you may want to consult your dentist about whether to avoid dental products containing fluoride. Adults and children over age nine should consult their dentist or doctor and show him/her this notice to determine if an alternate source of water low in fluoride should be used.
- ✓ This is not an emergency. If it had been, you would have been notified immediately. Fluoride in small amounts helps prevent tooth decay. However, some people who drink water containing fluoride in excess of the MCL over many years could get bone disease, including pain and tenderness of the bones. Fluoride in drinking water at half the MCL or greater may cause mottling of children's teeth, usually in children less than nine years old. Mottling, also known as dental fluorosis, may include brown staining and/or pitting of the permanent teeth. This problem occurs only in developing teeth, before they erupt from the gums. Although it takes many years of exposure to fluoride for bone disease to develop, mottling can occur after a relatively short period of exposure.

What happened? What is being done?

Fluoride contamination is rarely due to human activity. Fluoride occurs naturally in some areas and is found in high concentrations in our source water.

(Describe corrective action)

We anticipate resolving the problem within (estimated time frame) _____. For more information, please contact (name of contact) _____ at (phone number) _____ or (mailing address) _____.

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 (system name) _____
Colorado Public Water System ID#: _____ Date distributed: _____