



***NON-COMMUNITY GROUNDWATER
PUBLIC WATER SYSTEM
SANITARY SURVEY PROGRAM
PERFORMANCE GUIDELINES***

**FOR LOCAL HEALTH DEPARTMENTS
PERFORMING SANITARY SURVEYS ON BEHALF
OF THE COLORADO DEPARTMENT OF PUBLIC
HEALTH & ENVIRONMENT**

March, 2012
*Colorado Department of Public Health & Environment
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Non-Community Groundwater System Sanitary Survey Program Performance Guidelines

INTRODUCTION

The Water Quality Control Division (“the Division”) Safe Drinking Water Program is responsible for primary enforcement authority of the Colorado Primary Drinking Water Regulations (“the CPDWR”). This responsibility includes conducting routine sanitary surveys and preparing sanitary survey reports for each public water system in Colorado. The majority of public water systems in Colorado are classified as non-community groundwater (NCGW) systems. To assist with conducting sanitary surveys at the NCGW systems, the Division has partnered with various local health departments throughout Colorado via a Statement of Work Agreement (“the Agreement”) that is executed by purchase order.

As part of the NCGW System Sanitary Survey Program (“the Program”) and pursuant to the Agreement, the local health department has agreed to conduct specific assigned sanitary surveys at NCGW systems, prepare sanitary survey reports and follow-up with deficiencies or violations that are identified during these surveys on behalf of the WQCD Safe Drinking Water Program. The sanitary surveys must be conducted in conformance with the requirements outlined in these Non-Community Groundwater System Inspection Program Performance Guidelines (“the Guidelines”).

The sanitary surveys must be conducted during the time period from the effective date of the Agreement through September 30, 2012. The sanitary survey deficiency follow-up work, including any pre-approved physical follow-up surveys, will be conducted throughout this time period. More specifically, this work shall be conducted for each inspected public water system with significant deficiency and/or violations within one hundred twenty (120) days of the date of the sanitary survey letter issued to the system. The last possible date for completion of follow-up work is January 28, 2013.

NCGW SYSTEM SANITARY SURVEY PROGRAM PERFORMANCE

Once the local health department’s purchase order has been issued, the local health department can begin performing their assigned sanitary surveys. A list of the local health department’s assigned sanitary surveys is provided in the Sanitary Assignments Table included in the Agreement.

As participants in the program, the local health department represents the Division and shall conduct sanitary surveys in a manner that is consistent with the Division’s sanitary survey process, policies and procedures. Ongoing participation in the Program is dependent on the performance of the local health department or one of its representatives. The Division will be monitoring and evaluating the performance of the local health department throughout the term of the Agreement. The local health department or one of its representatives may continue to participate in the Program provided that the Division continues to deem their performance satisfactory. See the ‘Sanitary Survey Performance and Procedures’ section below for more details on what constitutes satisfactory performance as it relates to the Program. This section includes detailed procedures for sanitary survey preparation, conducting a sanitary survey, preparing and submitting sanitary survey reports and deficiency/violation follow-up activities.

If the local health department or one of its representatives does not perform satisfactorily as stipulated in the Agreement pursuant to these guidelines, the Division may terminate this Agreement at any time; however, the Division shall provide written notice to the local health department at least thirty (30)

calendar days in advance of the effective date of termination. Based on the Division's quality assurance process for reviewing the sanitary survey work of the local health department, the Division may request that an individual representative of the local health department performing sanitary surveys be omitted from the program if that individual's performance is not deemed satisfactory. It is the responsibility of the local health department NCGW Manager to communicate the decision to that person.

SANITARY SURVEY ASSIGNMENTS AND REIMBURSEMENT RATE INFORMATION

Sanitary Surveys

The local health department agrees to complete all assigned sanitary surveys during the agreed upon time period from the effective date of the Agreement to September 30, 2012. The Division agrees to reimburse the local health department for each satisfactory sanitary survey completed at established rates that are provided in the Sanitary Survey Reimbursement Rates table in the Agreement. The Division also agrees to reimburse the local health department at established rates also included in the aforementioned table for both properly documented follow-up activities concerning any deficiencies or violations as well as follow-up sanitary surveys that have been pre-approved by the Division. The last possible date to conduct pre-approved follow-up sanitary surveys and deficiency follow-up work activities is January 28, 2013.

The local health department will be reimbursed for each sanitary survey or follow-up sanitary survey based on a satisfactory, complete and timely submittal of final sanitary survey reports. Sanitary survey reports for sanitary surveys and any follow-up surveys must be completed and submitted to the Division and the water system's administrative contact (and operator in responsible charge if appropriate) within thirty (30) days of the site visit date.

All reimbursement rates are a price per sanitary survey, including all lodging, per diem, vehicle, mileage, admin, and other full time employee (FTE) costs. The reimbursement rate is subject to a twenty-five percent (25%) reduction in any case where a sanitary survey report is submitted to the Division and the water system's administrative contact (and operator in responsible charge if appropriate) after the thirty (30) day deadline. These reimbursement rates are valid through the term of this Agreement. Any sanitary survey report submitted after sixty (60) days of the date of the site visit date will not be reimbursed by the Division.

Sanitary Survey Significant Deficiency/Violation Follow-Up

The local health department will also be reimbursed based on level of effort for follow-up activities concerning deficiencies or violations as they are resolved or attempted to be resolved. The level of effort is detailed in the Follow-Up Activity Work Reimbursement Rates table below. The actual number of follow-up activities will be reported to the Division via follow-up tracking documentation (called the compliance record) when the water system's deficiencies are resolved and/or all follow-up work performed by the local health department has been completed. Once the local health department has completed all follow-up work for all public water systems that were inspected and all compliance record documentation has been submitted, the Division will review the documentation to determine the reimbursement amount and notify the local health department via email of the total reimbursement amount. This will permit the local health department to review and approve the amount prior to payment. Once the local health department and the Division agree upon the reimbursement amount, the Division will increase the purchase order amount to compensate the local health department for their follow-up activity work.

All follow-up activities must be completed within one hundred twenty (120) days of the date of the sanitary survey letter that was issued to the inspected public water system. The local health department shall submit a copy of the follow-up compliance record when all follow-up work has been completed but no later than fourteen (14) days after the one hundred and twentieth (120th) day of the compliance period. The last possible date to complete follow-up activities is January 28, 2013 and the last possible date to report the activities to the Division is February 11, 2013. Follow-up activities that do not result in a resolution are subject to reimbursement per the Division's discretion that is based on an evaluation of the activities completed by the local health department inspector. Additional information concerning follow-up activities is covered below under the 'Follow-up Activities and Public Water System Response to Deficiencies' section.

Follow-Up Activity Work Reimbursement Rates			
Follow-Up Bin	A	B	C
Reimbursement Per deficiency or based on level of effort or a combination of both	\$25	\$40	\$65
Maximum level of effort	Up to 30 minutes of correspondence (phone/e-mail)	Up to 1 hour of correspondence (phone/e-mail)	Up to 2 hours of correspondence (phone/e-mail) and/or up to 1 follow-up site visit ¹
Deliverables	Deficiencies resolved via plans submitted or phone/e-mail record	Deficiencies resolved or phone/e-mail record	Deficiencies resolved or phone/e-mail record
Typical deficiencies addressed ²	D902 – Inadequate Backflow Assembly Testing F317 – Storage tank air vent opening M610 – Cross-Connection Control Program O710 – Operator certification R510 - Monitoring plan R520 – Records Retention R525 – Monitoring Residual Disinfectant (weekly at entry point) T161 – Secondary Storage T162 – Non ANSI/NSF Materials	D210 – Raw Water Taps D220 – Raw Water By-pass D230 – Inadequate Disinfection Residual D240 – Inadequate Pressure (less than 20 PSI) D901/T901 – Complex Cross connections F310 – Storage tank conditions R540 – Construction w/o approval S030 – Well construction (venting, wellhead, sanitary seal) S031 – Well location T112 – Groundwater Disinfection	Any deficiency in Bin B that would require additional effort – to be approved by the NCGW System Inspection Coordinator

¹ Any follow-up site visit must be approved by the WQCD Non-Community Groundwater System Inspection Coordinator and will be reimbursed at the sanitary survey follow-up rate included in the Agreement (see the Sanitary Survey Reimbursement Rates table) and not the Bin C \$65 rate, which accounts for up to three follow-up sanitary surveys if pre-approved by the Division.

² These list of codes are to provide examples that most likely fall into each respective category. The reimbursement rate is determined by whether deficiencies and/or violations are resolved, as well as, the maximum level of effort expended by the inspector. Thus, example codes listed in Bin B may be reimbursed at the Bin A rate or vice versa.

SANITARY SURVEY PERFORMANCE AND PROCEDURES

Sanitary Survey Assignments

Prior to the Agreement being executed, the assigned sanitary survey list was negotiated and the local health department had the opportunity to provide comments and accept the list before being finalized. Pursuant to the Agreement, the local health department agrees to complete all assigned sanitary surveys from the effective date of the Agreement to September 30, 2012. If for some unforeseen reason (after the Agreement is executed), the local health department cannot conduct any, a limited number or all of the sanitary surveys, the local health department must immediately notify the WQCD Non-Community Groundwater System Inspection Coordinator, hereinafter referred to as “the Coordinator”.

Changes to the assigned sanitary surveys list will not be authorized unless both the Division and the local health department have agreed to the change. For purposes of this Program, the local health department personnel should not conduct sanitary surveys at public systems that are not assigned to the local health department and included in the assigned sanitary survey list. The local health department will not receive reimbursement from the Division for conducting surveys at water systems not included in the list.

After the local health department starts performing their assigned sanitary surveys, they may continue doing so provided that each survey is satisfactorily completed according to the Division’s discretion. The Division’s determination of satisfactory performance is based on the guidelines referenced below under ‘Conducting a Sanitary Survey’ and the ‘Sanitary Survey Reports’ sections. If the Division determines that a sanitary survey has not been satisfactorily completed, the Coordinator has thirty (30) days to notify the local health department inspector of this determination. If the local health department inspector continues to not satisfactorily complete sanitary surveys, the Division may request that the inspector be omitted from the Program or that the Agreement be terminated if the local health department has just that one inspector.

Discovery of an Inactive or Non-Public NCGW System

In the event that the local health department inspector discovers that any of the water systems in their assigned sanitary survey list are inactive (for example, closed or hooked up to another public water system), the local health department inspector (or the local health department’s NCGW Manager) shall notify the Coordinator. In addition, if the local health department inspector finds that the water system no longer meets the definition of a public water system as defined in Section 1.5.2(107) of the CPDWR (and thus is non-public), the inspector shall notify the Coordinator. The notification for either event may take the form of a telephone conversation or electronic mail (e-mail) and shall be made no later ten (10) days after the water system is discovered to be inactive or non-public. After this notification, the local health department inspector shall complete a SDWIS Inactivation Form (**Attachment 1**) and submit it to the Coordinator within fourteen (14) days of discovering that the water system is inactive. Alternatively, if the inspector is at the water system when being discovered to be inactive or non-public, the system can complete the form and the inspector can submit it to the Coordinator within the fourteen (14) day deadline.

Since the Division does not have authority to regulate non-public water systems, sanitary surveys cannot be conducted at inactive or non-public water systems. Pursuant to this Agreement, the local health department shall not perform sanitary surveys at non-public or inactive systems. Any work performed by the local health department with these types of systems is not subject for reimbursement.

The Division commits to replacing any inactive or non-public water systems in the assignments list so that the local health department maintains the total number of systems originally assigned.

Reimbursement for Inactivation of Water Systems Included in the Sanitary Survey Assignments List

The Division agrees to reimburse the local health department forty dollars (\$40) for each water system listed in their sanitary survey assignments list that is inactivated provided that an inactivation form is properly completed and submitted to the Division within the 10 business day deadline. If the local health department inspector has any questions concerning the inactivation of a water system or completing the form, please contact Erica Kannely of the Division Compliance Assurance Section. Ms. Kannely can be contacted at 303.692.3543 or via e-mail to erica.kannely@state.co.us.

Discovered Systems

The local health department personnel shall contact Ms. Kannely if a non-public water system is discovered that is believed to be public. Ms. Kannely's contact information is listed directly above.

NCGW Sanitary Survey Training

The Division will notify the local health department of any mandatory NCGW sanitary survey training that will be offered to all inspectors participating in the Program. However, training is mandatory for all local health department personnel that are new to the Program. This training is mandatory for all new personnel that participate in the program and must be attended prior to conducting any assigned sanitary surveys. In addition, the Division will evaluate if any existing local health department personnel require training. In this case, the training is also mandatory and the Division will notify the local health department NCGW Manager that the identified personnel are required to attend. The training will consist of classroom and may also include field training involving a sanitary survey at a public water system that is located in the local health department's jurisdictional area.

If the local health department requires training in any of the categories described above, the Coordinator will schedule training and the date(s) and location(s) will be communicated to the local health department once the training is scheduled.

In addition to the training referenced above, the Coordinator or other designated Division representative may elect to attend a minimum of one sanitary survey with each inspector of the local health department. This will allow Division staff to provide one-on-one feedback after the sanitary survey is completed. The local health department inspectors should proceed with planning their sanitary survey schedules. The Coordinator will notify the inspector if a Division representative plans to attend a sanitary survey. It is not Division's intent to impact the inspector's scheduling process in anyway. If the need arises, the Division representative may elect to attend additional sanitary surveys and will coordinate with the inspector as he/she schedules sanitary surveys. The local health department inspector may also join the Coordinator or other Division representative on one of their sanitary surveys as a means of receiving additional training.

Sanitary Survey Preparation

In advance of the sanitary survey, the local health department inspector shall contact the public water system administrative contact or other representative (e.g., operator in responsible charge) if the administrative contact is not available to schedule the survey. The administrative contact name and phone number are listed in the Comprehensive Report (referenced in the next paragraph) that the

Division will provide the local health department inspector for each assigned public system. A sanitary survey must not be conducted unless the administrative contact or other representative is notified beforehand to schedule the sanitary survey. The contacted individual (or other system representative) must be present for the entire survey. Sanitary surveys that are conducted without the presence of a representative from the water system are not subject for reimbursement. The local health department inspector shall notify the Coordinator if contact to someone from the water system is unsuccessful after three (3) attempts.

Comprehensive Report

The Division agrees to provide access to contact, inventory, and compliance information for each public water system in Schedule A.2 before the inspector conducts the sanitary survey. This information is available in the Division's comprehensive water quality report (called a Comprehensive Report). The local health department inspector is required to obtain the Comprehensive Report for each system that they will inspect. **Attachment 2** provides an example of a Comprehensive Report. The data contained in these reports can be updated as frequently as daily so it is best to obtain the report less than one month prior to the scheduled sanitary survey. The inspector must request the public water system's Comprehensive Report at a minimum of one week prior to the scheduled sanitary survey date so as to assure that the Division has adequate time to generate the report. To request a Comprehensive Report, the inspector shall e-mail the WQCD Data Management Group Supervisor at elisa.willard@state.co.us and include the name of the public water system and its public water system identification (PWSID) number. To facilitate the processing of these reports in a timely manner, it is important to include both the water system name and PWSID number in the email request. A copy of the 'Comprehensive Report SDWIS Code Definitions' guidance, which provides a definition of the codes used in the Comprehensive Report, is also provided in Attachment 2.

As part of the preparation for an upcoming sanitary survey, the local health department may contact the Coordinator for additional information (e.g., past sanitary surveys if not conducted by the local health department) or questions regarding the public water system. To help achieve satisfactory sanitary survey performance, the local health department inspector must review the public water system's Comprehensive Report, past sanitary survey reports, as well as any other information collected on the system prior to performing the sanitary survey. Failing to review such documentation in preparation of a sanitary survey may lead to an unsatisfactory survey, which violates the terms of the Agreement and could jeopardize reimbursement.

Conducting a Sanitary Survey

All local health department personnel conducting sanitary surveys must adhere to the policies, practices and regulations established by the Division while conducting sanitary surveys at NCGW public water systems. Sanitary surveys must identify all significant deficiencies and violations that are in existence at the time of the sanitary survey. The inspection Part I, Part Ia, and Part II forms include checklists of the codes for all the significant deficiencies or violations applicable to NCGW public water systems. **Attachment 3** provides a copy of the Division's NCGW Sanitary Survey Observations and Deficiencies/Violations Codes Checklist & Guidance, which is a Microsoft Office Excel based checklist tool. This tool contains a deficiency code checklist that the local health department inspector shall complete after the sanitary survey to correctly identify and summarize the deficiencies and/or violations that are found during the sanitary survey. Upon completion of the checklist, the excel tool will automatically compile a summary of all the significant deficiencies and/or violations that the inspector shall incorporate into the sanitary survey letter. In the unlikely case that the local health department inspector does not identify any deficiencies or violations, it shall be noted that none were found under

each respective section in the sanitary survey letter. The electronic sanitary letter template includes a section for significant deficiencies and violations. These sections must not be left blank or deleted in their entirety.

In addition to identifying deficiencies and/or violations, personnel conducting sanitary surveys are expected to provide the associated compliance assistance to NCGW public water system owners, administrative staff and/or certified operators within their level of expertise and/or in consultation with the Coordinator, Lead Drinking Water Engineer and/or the appropriate county's Design Review Engineer. **Attachment 4** provides a copy of the Engineering Section Contact Information list.

All local health department personnel shall adhere to the above guidelines for conducting sanitary surveys in order to achieve satisfactory performance so that they are reimbursed, as well as, continue to participate in the NCGW System Sanitary Survey Program.

Photographs

Local health department inspectors conducting NCGW sanitary surveys must utilize a camera so that photographs can be taken to document appropriate significant deficiencies and/or violations detected during the surveys. In addition, the inspector can take photographs of equipment or water system facilities that are an unknown or not fully understood by the inspector or system personnel. In this case, the photographs can be e-mailed to the Coordinator so that the Division can provide guidance when possible. Photographs taken of any significant deficiency or violation during the sanitary survey must be included in the survey letter, with clear identification of the subject/identity of the photograph.

Sanitary survey letters that include photographs may cause problems when e-mailing the letter due to large file sizes. In addition, the Portable Document Format (PDF - see <http://get.adobe.com/reader/> for more details) of such letters are slow to open. To help mitigate these issues, the local health department inspector shall minimize the file size by compressing the photos incorporated into any survey letter. This step should be done before survey letters are converted to PDF for the final e-mail submittal. A guidance document (called Compressing Photographs in Word) on how to compress photos in Word is provided in **Attachment 5**.

Comprehensive Reports Used for Inventory Changes

An important component of the sanitary survey is for the local health department inspectors to ground truth the water system's inventory information against what is included in the Comprehensive Report. During the sanitary survey, the local health department inspector shall use these reports to note any changes such as new system personnel (e.g., change of an administrative contact), population changes, additional addresses, phone numbers, or e-mail addresses. Furthermore, the Comprehensive Report shall be used to note any water system facilities that were found to be inactive (but are listed as active in the report) or the addition of active facilities that are not included in the inventory and listed in the report (an example of a facility that is often missing are storage tanks). Please note changes as legibly as possible and use ink as pencil is difficult to read on scanned PDF copies.

Discovery of Potential Acute Situations

If an immediate threat to public health is identified during the sanitary survey, the local health department inspector must immediately contact the Division's Lead Drinking Water Engineer so that the Division can determine whether an Acute Team response is necessary. This agreement does not

prohibit the local health department in any way from taking an enforcement action under their respective regulations based on observations at the water system.

If an uncontrolled high hazard cross-connection that potentially poses an immediate threat to public health is identified during the sanitary survey, the local health department inspector must immediately contact the Lead Drinking Water Engineer at the time of the sanitary survey. After this notification, the Lead Drinking Water Engineer will engage the WQCD Acute Team to determine whether the team needs to respond. This team would then provide guidance to the local health department regarding the acute situation.

To contact the WQCD Lead Drinking Water Engineer in either scenario described above, please call Tyson Ingels via cell phone at 303.916.0240. If Mr. Ingels does not answer, please leave a voice mail that the local health department has discovered a potential acute during a sanitary survey. In addition, if the local health department inspector is able to send a text message to Mr. Ingels cell phone, please text 'POTENTIAL ACUTE DURING SANITARY SURVEY' and provide your name and cell phone number. Mr. Ingels is also available via email at tyson.ingels@state.co.us.

Local health department personnel must adhere to the above guidelines for conducting sanitary surveys in order to achieve satisfactory performance so that they are reimbursed, as well as, continue to participate in the NCGW system sanitary survey program.

High Hazard Cross-Connections that Do Not Pose Acute Situations

During the sanitary survey, the local health department inspector must inform the public water system that in accordance with Article 12, Section 12.1 of the CPDWR, they have ten (10) days from the date that they are notified in writing (which would be the sanitary survey letter) to resolve high hazard cross connections that do not create a potential immediate threat to public health. The local health department inspector must follow-up with the system if they have not received notice that the uncontrolled cross connection has been corrected within the ten (10) day time period. The follow-up activity can take the form of a telephone conversation or an e-mail and should result in the inspector learning whether the cross connection was corrected. The inspector shall continue to follow-up with the system until the cross connection is corrected. The inspector must also contact the Coordinator after the ten (10) day period to relay whether the uncontrolled cross connection was resolved or not. In addition, the inspector may contact the Coordinator if the system needs guidance or assistance on how to correct the cross connection. For those cases where the system has not corrected the cross connection and the inspector feels that all avenues have been exhausted, the inspector shall refer the system to the Coordinator for Division follow-up and possible resolution or if warranted referral to the WQCD's Enforcement Unit. Any follow-up activities completed by the local health department inspector concerning high hazard cross connections are subject for reimbursement if appropriately tracked and submitted to the Division. Sanitary survey follow-up activities, as well as, reimbursement for such activities are covered in greater detail in the 'Follow-Up Activities and Public Water System Response to Deficiencies' section below.

Local health department personnel must adhere to the above guidelines for conducting sanitary surveys in order to achieve satisfactory performance so that they are reimbursed as well as continue to participate in the NCGW System Sanitary Survey Program.

SANITARY SURVEY REPORTS (LETTERS, INSPECTION FORMS & COMPREHENSIVE REPORTS)

Sanitary Survey Reports

The local health department inspector's complete report submittal must include a signed sanitary survey letter, completed Part I and Part II inspection forms (and Part Ia if needed), and a copy of the public water system's Comprehensive Report if utilized for inventory changes. The Division agrees to provide an electronic template for the sanitary survey letter (**Attachment 6**), current inspection forms (**Attachment 7**), copy of the Comprehensive Report for the water system, and the NCGW Sanitary Survey Observations and Deficiencies/Violations Codes Checklist & Guidance (see Attachment 3) that provides a deficiency code checklist so that the deficiencies can be summarized and included in the letter. The letter and inspection forms shall be correct, complete, and free from errors at the time they are submitted to the inspected public water system and the Division. To help ensure that the full report meets these conditions, the inspector agrees to implement a quality control review process to ensure the timeliness, accuracy, and completeness of reports before they are submitted to the Division. The local health department inspector could utilize peer or supervisor review of these reports for an internal quality control practice before finalizing the report submittal.

Since the Coordinator is required to receive a copy of the sanitary survey letter, at the end of the letter template, the WQCD NCGW System Inspection Coordinator is listed for an electronic copy. The local health department inspector must also list the WQCD Design Review Engineer of the respective county for an electronic copy if design review related violations were identified during the sanitary survey (see Attachment 4) for a list of the design review engineers). Lori Moore of the WQCD's Operator Certification Program must also be electronically copied at lori.moore@state.co.us if operator in responsible charge (ORC) issues are identified during the sanitary survey. Ms. Moore must be listed for an electronic copy in the letter.

In the event that the local health department inspector is unable to submit a complete report via electronic mail (e-mail) and thus have to mail it U.S. mail, the sanitary survey letter should list all appropriate recipients (referenced above) for a hard courtesy copy.

The local health department personnel conducting sanitary surveys must adhere to the above requirements for conducting and documenting sanitary surveys. The Division will not reimburse for sanitary surveys that were not conducted in accordance with the requirements.

Sanitary Survey Correction Letters

If the Coordinator finds a sanitary survey letter to have errors, the Division can request that the local health department issue a sanitary survey correction letter. Examples of errors include incorrect deficiency or violation codes used for the findings where the code default language does not correlate with the code and incorrectly identifying and citing a deficiency or violation during the sanitary survey amongst others. Sanitary survey correction letters are not subject to reimbursement since they are correcting errors in the original sanitary survey letter that should have been quality assured.

Submittal of Sanitary Survey Reports to the Public Water System and the WQCD

In accordance with Article 11, Section 11.4(a) of the CPDWR, the local health department inspector, as an authorized representative of the Division, must issue written notice of any significant deficiencies or violations of the CPDWR (via the sanitary survey letter) to the public water system within thirty (30)

days of completing the sanitary survey. Upon completion of the survey letter, the inspector shall e-mail or mail a copy of it to the administrative contact of the public water system. The name of the administrative contact and address are included in the Comprehensive Report.

Pursuant to this Agreement, the local health department inspector shall also submit a copy of the complete sanitary survey report to the Coordinator within the thirty (30) day deadline. What constitutes a complete copy is described below under the *Submittal of Sanitary Survey Reports to the WQCD* section. The inspector shall notify the Coordinator via e-mail that the sanitary survey report has been completed and mailed if an electronic copy cannot be emailed.

If the 30th day falls on a non-business day (e.g., holiday or weekend), the local health department inspector shall submit the sanitary survey letter to the water system and the complete survey report to the Coordinator on the next business day following the deadline.

Pursuant to this Agreement, the local health department inspector also agrees to submit a copy of the sanitary survey letter to the water system and survey report to the Coordinator that do not contain significant deficiencies or violations within thirty (30) days of completing the sanitary survey.

Submittal of Sanitary Survey Reports to the WQCD

The local health department inspector shall e-mail a copy of the complete sanitary survey report to the Coordinator at catherine.heald@state.co.us. A complete report must consist of a signed sanitary survey letter, legible copies of the completed inspection forms and a copy of the Comprehensive Report if inventory changes are noted that are clear (in ink) and legible. **Attachment 8** provides an example copy of a complete sanitary survey report. Unsigned copies of the letter cannot be accepted. The Division prefers that the complete report be compiled into one document (whether Word or PDF) and submitted as one document. In the case when photographs are included, the sanitary survey letter must be submitted in color. When naming the file, the local health department inspector shall ensure that the name of the public water system is included in the file name. E-mailed reports that are complete and satisfactory will be considered received on the date of the e-mail and that date will be used to determine the timeliness of the submittal and the appropriate reimbursement rate. The local health department does not have to mail a hard copy to the Coordinator if an e-mail is sent satisfactorily. The Coordinator reserves the right to request that a hard copy be mailed if the e-mail copy is not satisfactory (e.g., not complete, missing a signature, illegible).

The Division prefers that the local health department submit sanitary survey reports via e-mail. If the local health department is unable to e-mail the copy, it should be mailed to the Coordinator at the following address:

Cathy Heald

NCGW System Inspection Coordinator
CDPHE - WQCD
Engineering Section, WQCD-ES-B2
4300 Cherry Creek Drive South
Denver, CO 80246-1530

(Please ensure that the complete address above is included on the envelope to ensure timely delivery.)

Reports mailed to the Division will be date/time stamped in the WQCD mailroom and that date/time stamp will be used to determine the timeliness of the submittal and the appropriate reimbursement rate. The Division requests that the local health department not transmit reports via facsimile.

Local health department personnel must adhere to the above guidelines for preparing sanitary survey letters in order to achieve satisfactory performance and continued participation in the NCGW system sanitary survey program. Furthermore, in order to be reimbursed for completed sanitary surveys, the local health department must submit a complete copy of the sanitary survey report in a timely manner.

Customer Satisfaction Follow-Up

The Coordinator may periodically conduct a phone survey with public water systems that the local health department has inspected to obtain performance feedback. The results of any phone survey or other survey or interview will be communicated to the local health department.

PUBLIC WATER SYSTEM RESPONSE TO DEFICIENCIES/VIOLATIONS

As stated above under the 'Conducting a Sanitary Survey' section, local health department personnel conducting sanitary surveys must identify significant deficiencies and violations and provide written notification of the deficiencies to the water system via the sanitary survey letter. Once the public water system receives the sanitary survey letter, the system is required to respond both orally and in writing to any significant deficiency or violation per the CPDWR.

30 Day Consultation

In accordance with Article 11, Section 11.4(b) of the CPDWR, public water systems that have incurred significant deficiencies or violations during a sanitary survey must consult with the local health department inspector regarding corrective actions and an implementation schedule within thirty (30) days of receiving the sanitary survey letter. This consultation may take the form of a telephone conversation, e-mail, or meeting. This consultation provides an opportunity for the water system to report any significant deficiency or violation that has been corrected to date. The water system should report corrective actions for any outstanding significant deficiencies or violations and the proposed date on when they will be completed (called a corrective action plan and schedule). Corrective action plans are covered in greater detail in the next section immediately below, as well as, in the *Corrective Action Plan Approval* section below.

If the water system fails to provide the thirty (30) day consultation notification to the local health department inspector, the inspector may notify the system to let them know that they were required to provide a consultation. If contact is made with the system, the inspector can initiate the consultation. This follow-up activity can be tracked on the inspector's tracking form for the system's sanitary survey. This tracking form is detailed under the *Deficiency Follow-Up Tracking & Resolution* section below.

45 Day Written Response & the Corrective Action Plan

In accordance with Article 11, Section 11.4(c) of the CPDWR, public water systems must respond in writing to significant deficiencies and violations outlined in the sanitary survey letter within forty-five (45) days of the sanitary survey letter. The water system's written response may be submitted via email to the local health department inspector. The local health department inspector must notify the Coordinator via email whether each inspected public water system submitted a written response or not within fourteen (14) days after the 45th day of the response period.

The public water system's written response must include the corrective action plan that details the corrective actions for the significant deficiencies and/or violations that were identified during the survey.

The corrective action plan must include:

- the date the system corrected any significant deficiency and/or violation plus evidence of that correction, and/or
- the proposed corrective action and schedule (providing a specific date) for when the system will correct each outstanding significant deficiency and/or violation.

Attachment 9 provides a copy of a sanitary survey response form that the System may use to document the required written response to the sanitary survey letter. While using this form is optional, it will fulfill the requirement to provide the forty-five (45) day written response if completed and submitted to the local health department inspector and subsequently to the Coordinator. Attachment 9 also provides a copy of an example response form that includes all the required elements and thus is deemed an adequate response.

If the system's written response fails to include the elements described directly above, the local health department inspector shall deem the response as inadequate and notify the system that their response is not acceptable. The local health department inspector may advise the system of what constitutes an acceptable response and to avoid possible compliance violations an adequate response must be submitted on or by the forty-five (45) day deadline. In the event that the system has submitted an inadequate response and the forty-five (45) day time line has expired (and the local health department inspector feels that the system is trying to the best of their ability), the inspector can request the system to submit a revised response as soon as possible but no later than ten (10) days after the forty fifth (45th) day of the response period. In such cases, the local health department inspector shall notify the Coordinator that a ten (10) day extension has been provided.

Failure to Submit a 45 Day Written Response

In the event that the public water system does not submit a written response within the forty-five (45) time period and after the local health department inspector exhausts all avenues to obtain one, the inspector must complete and submit a NCGW Failure to Respond to Sanitary Survey Letter Form (**Attachment 10**) to the Coordinator via email. This form contains an activity log that the inspector shall use to track all the follow-up communications completed in an attempt to obtain the written response. This failure to respond referral also applies to systems that initially submit an unacceptable written response and subsequently fail to resubmit an acceptable response or any response at all. The Division will issue the public water system a Compliance Advisory for failing to provide a written response or adequate written response that will direct the system to follow-up with the local health department inspector that conducted the sanitary survey within thirty (30) days of the date of the Compliance Advisory. If the system fails to adequately respond to the advisory, the system will be referred to the WQCD Enforcement Unit and could incur a violation.

Corrective Action Plan Approval

As stated above under the *45-Day Written Response & the Corrective Action Plan* section, the water system's written response must include a corrective action plan that contains the following:

- the date the system corrected any significant deficiency and/or violation plus evidence (e.g., photograph or copy of a plan) of that correction, and/or
- the proposed corrective action and schedule (providing a specific date) for when the system will correct each outstanding significant deficiency and/or violation.

For those written responses that are adequate, the local health department inspector shall review the corrective action plan and may discuss the plan with the water system to the degree that his/her level of expertise permits and/or in consultation with the Coordinator. If the local health department inspector is not comfortable with discussing a proposed corrective action for any deficiency or violation, the inspector may refer the system to contact the Coordinator directly. The local health department inspector may refer this deficiency or violation in its entirety to the Coordinator. Alternatively, the local health department inspector may follow-up with the Coordinator on the agreed upon corrective action for the benefit of the local health department maintaining tracking responsibility of the significant deficiency or violation. Through the review, discussion and consultation process, the water system's corrective action plan must be approved by either the local health department in straight forward cases (when the water system understands how to correct all the deficiencies and/or violations) or in conjunction with the Division in more complex cases.

The local health department inspector must notify the Coordinator of any requested corrective action schedule that extends beyond one hundred and twenty (120) days from the date of the local health department inspector's letter, which is the required time period a water system has to complete all corrective actions (discussed further in the next section). Any deficiency or violation with a proposed corrective action schedule that exceeds the one hundred and twenty (120) day time period shall be referred to the Coordinator. The Division will be responsible for that deficiency and/or violation and will either approve or disapprove a schedule extension.

120 Day Compliance Period to Complete Corrective Actions

In accordance with Article 11, Section 11.4(d) of the CPDWR, public water systems must:

- have completed corrective actions for all significant deficiencies and/or violations identified during the sanitary survey within 120 days of receipt of the sanitary survey letter, or
- be in compliance with a Division approved corrective action plan and schedule (that has been approved to extend beyond the one hundred and twenty (120) day time period).

The local health department inspector is responsible for following up any significant deficiencies and/or violations with corrective actions and schedules up through the one hundred and twenty (120) day deadline. The local health department inspector shall refer significant deficiencies and/or violations with corrective actions and schedules that extend beyond the one hundred and twenty (120) day time period to the Division. In the latter case, the local health department inspector no longer has to account for these significant deficiencies and/or violations as they become the Division's responsibility.

If a water system fails to correct any significant deficiency or violation within the required one hundred and twenty (120) day time period and has not requested an extension beyond this time period, the local health department inspector shall refer that significant deficiency or violation to the Division by marking the referral code ('R') on the follow-up tracking form (discussed directly below).

DEFICIENCY/VIOLATION FOLLOW-UP TRACKING & RESOLUTION

A water system's written response to deficiencies should be directed to the local health department inspector who conducted the sanitary survey. When an inspector receives a written response to a sanitary survey, the inspector shall notify the system that their response was received. This acknowledgement can take the form of a telephone conversation or an e-mail. After this acknowledgement, the local health department inspector agrees to review the response to determine:

- if the system's response addresses all significant deficiencies and/or violations identified during the sanitary survey (the local health department inspector shall check to see if the response is complete and credible),
- if any significant deficiencies and/or violations were resolved and evidence of the correction(s) was included,
- if the system satisfactorily resolved the significant deficiencies and/or violations they stated they resolved and evidence of the correction(s) was included,
- if the system did not satisfactorily resolve those significant deficiencies and/or violations,
- whether there are any unresolved significant deficiencies and/or violations, and
- if a proposed corrective action plan (including a schedule with specific dates) for any unresolved significant deficiency and/or violation is included.

As stated above under the '*45-Day Written Response & the Corrective Action Plan*' section, the local health department inspector shall notify the Coordinator that a written response was received from the public water system. The local health department inspector is also encouraged to consult with the Coordinator if any questions arise or guidance is needed when determining whether deficiencies were satisfactorily resolved or not. In addition, the local health department inspectors should consult with the Coordinator if any questions arise concerning the system's proposed course of action and/or compliance schedule for any unresolved deficiencies if within the one hundred and twenty (120) day time period. As stated above, if the proposed compliance schedule extends beyond the one hundred and twenty (120) day time period, then the deficiency or violation must be referred to the Coordinator.

Significant Deficiency/Violation Follow-Up Activities

The local health department inspector agrees to follow-up with the system to ensure that each significant deficiency and/or violation is satisfactorily resolved within the one hundred and twenty (120) day time period. Follow-up activities can include but are not limited to:

- telephone conversations,
- e-mail,
- facsimiles,
- follow-up letters,
- consultation with the Coordinator,
- consultation with the WQCD Design Review Engineer,
- consultation with the public water system's ORC,
- obtaining photographs depicting corrections of deficiencies,
- physical follow-up sanitary survey if approved by the Coordinator, and
- referral communications to the Coordinator.

Hard copies of all follow-up activity correspondence such as e-mails, letters (including the system's 45-day written response), record of phone calls, facsimiles, and photographs must be maintained as part of the sanitary survey compliance record. The inspector must track all such follow-up activities on a NCGW Sanitary Survey Deficiency/Violation Follow-Up Tracking & Resolution and/or Referral Form (**Attachment 11**). This form can be used to track phone calls in lieu of a separate record of phone call. In the event that the inspector determines that any one deficiency or violation needs to be referred to the Division, in consultation with the Coordinator, the deficiency can be noted as a referral to the Division on the follow-up tracking form.

The follow-up activity work is completed once the inspector determines:

- that the system has corrected all significant deficiencies or violations (all follow-up activity correspondence, documentation and evidence must be included in the compliance record that is submitted to the Coordinator), or
- that the system has established a corrective action plan and schedule for any unresolved deficiency or violation, or
 - the schedule must be documented in the system's written forty-five (45) day sanitary survey response
 - the schedule must not exceed the one hundred and twenty (120) day time period
 - if any corrective action exceeds the one hundred and twenty (120) day time period, it is referred to the Division for review, approval and follow-up
- that any significant deficiency or violation shall be referred to the Division for some other reason other than a schedule extension, or
- any combination of the three above.

The local health department inspector must notify the Coordinator if the system has any unresolved significant deficiencies or violations after the one hundred and twenty (120) days or is in not in compliance with the Division approved compliance schedule. This notification must happen within fourteen (14) days of the 120th day. In this case, the inspector shall note this finding in the comments section of the NCGW Sanitary Survey Deficiency Follow-Up Tracking & Resolution and/or Referral Form that is submitted to the Coordinator. The Coordinator will follow-up with the system and if the system continues to not correct the significant deficiency or violation or to not comply with any compliance schedule, the system will be referred to the WQCD Enforcement Unit.

A complete copy of the compliance record must be emailed (preferred) to catherine.heald@state.co.us or mailed to the Coordinator to at the address referenced above. The local health department inspector shall notify the Coordinator via e-mail that a copy of the complete record is being mailed. The email copy of the compliance record shall include copies of the tracking form and all supporting documentation that includes evidence of correction(s), which should be scanned into one PDF file that is transmitted to the Coordinator. The email copy or U.S. mail copy of the compliance record submittal must include copies of all follow-up activity correspondence and documentation, including but not limited to:

- record of the system's initial thirty (30) day consultation (which can be noted on the follow-up tracking form),
- system's forty-five (45) day written response to the sanitary survey that must be previously deemed adequate and thus accepted by the local health department inspector,
 - the Coordinator must receive a copy of this written response in order to be reimbursed for follow-up activity work
- NCGW Sanitary Survey Deficiency Follow-Up Tracking & Resolution and/or Referral Form
- copies of record of phone calls,
- copies of all e-mail exchanges pertaining to the follow-up activity,
- copies of any photographs or other evidence, and
- copies of any facsimiles or letters.

A copy of the compliance record will be used to reimburse the local health department for their follow-up work and filed in the system's main drinking water file at the Division. The inspector should keep a copy of the complete compliance record for the local health department's file. An example copy of a complete compliance record is provided in **Attachment 12**.

REIMBURSEMENT OF SANITARY SURVEYS/FOLLOW-UP SANITARY SURVEYS

The sanitary surveys or follow-up sanitary surveys conducted pursuant to the Agreement shall be billed quarterly to the Division and no later than 30 days after the end of sanitary survey year (SSY) 2012, September 30, 2012, which is on or by **October 1, 2012**. The two billable quarters of SSY 2012 are April 1 – June 30 and July 1 – September 30. **Attachment 13** provides a copy of the invoice that shall be used for billing the Division for completed sanitary surveys or follow-up sanitary surveys. At the end of the quarter, the local health department shall complete and sign an invoice and submit it via email to the Coordinator (catherine.heald@state.co.us) for review and approval. The Coordinator will review the invoice and coordinate any corrections or changes with the local health department NCGW Manager. Upon approval, the Coordinator will sign the invoice and forward it to the WQCD Fiscal Officer for payment processing.

Significant Deficiency/Violation Follow-Up Activities

As referenced above in the '120-Day to Complete Corrective Actions' section, public water systems have one hundred twenty (120) days to resolve any significant deficiency or violation that is identified during a sanitary survey. The Division understands the possibility of having public water systems that will not resolve every deficiency and/or violation. Thus, the Division does not expect the local health department inspector to obtain resolution on every deficiency and/or violation. The follow-up tracking activities for any one system that is inspected could lead to a combination of any of the following:

- resolved deficiencies and/or violations,
- deficiencies and/or violations that the system fails to resolve for whatever reason, and
- deficiencies and/or violations that are intentionally referred to the Division for handling (e.g., failure to obtain Division design approval).

The local health department inspector must complete all follow-up activity work for each sanitary survey on or by the one hundred twenty (120) day time line that the water system had to resolve all significant deficiencies and/or violations. Once the local health department inspector has reached a point of obtaining resolution on all deficiencies and/or violations from the water system or has done everything possible to obtain that resolution, then the inspector should consider the case closed. At this point, the local health department inspector shall submit a copy of the complete compliance record to the Coordinator. The Division requests that the compliance record be submitted within twenty-one (21) calendar days after the water system's one hundred twenty (120) day deadline date. For any sanitary surveys conducted on the last day of the SSY2012, September 30, 2012, the local health department inspector must complete all follow-up activity work, including any pre-approved follow-up sanitary surveys, on or by **January 28, 2013**, which is one hundred twenty (120) days after the September 30th site visit date. The local health department inspector must submit the complete compliance record for any September 30, 2012 sanitary survey no later than **February 18, 2013**, which is twenty-one (21) days after when all follow-up activity work has to be completed for these surveys. Any compliance record submitted after twenty-one (21) days post the 120-day compliance period deadline may not be considered for reimbursement.

In order for the local health department to be reimbursed for follow-up work, the local health department inspector must submit a complete copy of the compliance record that includes the NCGW Sanitary Survey Deficiency Follow-Up Tracking & Resolution and/or Referral Form, the water system's forty-five (45) day written response detailing the corrective action plan (that has been approved by the local health department and/or the Division) and any support documentation as described above in the

Deficiency/Violation Follow-Up Tracking & Resolution section above.

The local health department inspector shall notify the Coordinator via email to catherine.heald@state.co.us once all follow-up activity work for all water systems that were inspected has been completed and all compliance record documentation has been submitted to the Coordinator. This email notification shall occur when the local health department inspector is submitting the last compliance record to the Coordinator. Once the Coordinator has received all compliance records from the local health department, the Coordinator will review the documentation to determine the total reimbursement amount for all completed follow-up activity work and complete a deficiency/violation follow-up work invoice (see **Attachment 14**). Once completed, the Coordinator will submit a copy of the invoice to the local health department NCGW Manager via email. The local health department NCGW Manager shall review the amount for approval and contact the Coordinator so that the reimbursement amount can be agreed upon. Once the local health department and the Division agree upon the reimbursement amount, the Division will increase the purchase order amount to compensate the local health department for their follow-up activity work. The purchase order amount must be increased prior to processing the follow-up work invoice.

Follow-Up Work Invoice

After the local health department has completed all their follow-up activity work and has submitted all their compliance records, the Coordinator will review each compliance record and assign each activity to either reimbursement Bin A, Bin B, or Bin C (detailed above in the Follow-Up Activity Work Reimbursement Rates table) so that the total reimbursement amount can be determined. Based on the review of the compliance records, the Coordinator will complete a deficiency/violation follow-up work invoice and submit it to the local health department NCGW Manager and/or inspector for review, approval and signature. The local health department NCGW Manager and/or inspector shall contact the Coordinator if any questions or concerns arise concerning the invoice. If the local health department agrees with the invoice, the local health department shall sign the invoice and submit it to the Coordinator. The Coordinator will finalize, sign and forward the invoice to the WQCD Fiscal Officer for payment.

The local health department shall submit all signed invoices in PDF to the Coordinator via email to catherine.heald@state.co.us. If the local health department cannot email these invoices, then copies should be mailed to the Coordinator at the address referenced above.

PROBLEM RESOLUTION

Any problems arising from this agreement shall first be addressed by the Coordinator and the local health department NCGW Manager for resolution. Should no resolution be forthcoming, the problems shall be addressed by the WQCD Lead Drinking Water Engineer and the local health department's designated manager to the designated NCGW Manager.

Water Quality Control Contacts

Non-Community Groundwater System Inspection Coordinator	Cathy Heald	303-692-3613
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Lead Drinking Water Engineer (A list of the local health department contacts, phone numbers and email addresses are included in the Agreement.)	Tyson Ingels	303-692-3002
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ATTACHMENT 1
INACTIVATION FORM

ATTACHMENT 2
EXAMPLE COMPREHENSIVE REPORT

&

COMPREHENSIVE REPORT SDWIS CODE
DEFINITIONS GUIDANCE

ATTACHMENT 3
NCGW SANITARY SURVEY OBSERVATIONS AND
DEFICIENCIES/VIOLATIONS CODES CHECKLIST & GUIDANCE

ATTACHMENT 4
ENGINEERING SECTION CONTACT INFORMATION LIST

ATTACHMENT 5
COMPRESSING PHOTOGRAPHS IN WORD GUIDANCE

ATTACHMENT 6
SANITARY SURVEY LETTER TEMPLATE

ATTACHMENT 7
SANITARY SURVEY FORMS
(PARTS I, Ia, II)

ATTACHMENT 8
EXAMPLE COPY OF A COMPLETE
SANITARY SURVEY REPORT

ATTACHMENT 9
SANITARY SURVEY RESPONSE FORM

&

EXAMPLE COPY OF A COMPLETED RESPONSE FORM

ATTACHMENT 10
NCGW FAILURE TO RESPOND TO
SANITARY SURVEY LETTER FORM

ATTACHMENT 11
NCGW SANITARY SURVEY DEFICIENCY/VIOLATION FOLLOW-UP
TRACKING & RESOLUTION AND/OR REFERRAL FORM

ATTACHMENT 12
EXAMPLE COPY OF A COMPLETE
COMPLIANCE RECORD

ATTACHMENT 13
INSPECTION YEAR 2012 SANITARY SURVEY INVOICE

ATTACHMENT 14
INSPECTION YEAR 2012 DEFICIENCY/VIOLATION
FOLLOW-UP WORK INVOICE