



COLORADO
Department of Public
Health & Environment

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

November 2, 2015

Water System Name
Address
City, CO ZIP
PWSID: PWSID

Subject: Public notice requirements for violations identified during sanitary surveys

Dear Administrative Contact:

Sanitary surveys play a vital public health protection role in implementing the Safe Drinking Water Act (Act). While on site, staff with the Colorado Department of Public Health and Environment (Department) works with water supplier personnel to evaluate water sources, treatment, distribution, storage, pumps, monitoring, system management and operator certification. Department staff reviews compliance with the Colorado Primary Drinking Water Regulations (Regulation 11) and the Water and Wastewater Facility Operators Certification Requirements (Regulation 100). We have helped water suppliers in Colorado address hundreds of significant deficiencies that could jeopardize water quality.

For the past several years we have been identifying and discussing violations of Regulations 11 and 100 during sanitary survey site visits. These violations are reported in the sanitary survey letter delivered to the administrative contact at each public water system.

Most of the violations identified during sanitary surveys require tier 3 public notice meaning that the violations typically need to be listed in the annual Consumer Confidence Reports (CCR) provided by community water systems to their customers. The public's right to know about drinking water violations has been required by the Act since congressional re-authorization in 1996.

Additionally, a small but important number of field-identified violations are more serious and require tier 1 or tier 2 public notice. These violations include not properly disinfecting the water, not having adequate filtration (for those required to filter), etc. These serious issues must be fixed as quickly as possible and the public must be notified in accordance with Regulation 11. For tier 2 violations this typically means notice within 30 days.

Due to long-standing software and staffing constraints, the Department has not cataloged and managed field-identified violations in the state's database. Therefore, the public notice requirements were not noted in the sanitary survey letters or tracked. Field-identified violations were not included when the Department issued the draft annual CCR each year. Beginning on January 1, 2016 the public notice requirements will be included in the sanitary survey letters and they will appear automatically in the draft CCR for the year following the sanitary survey. As always, the Department will help water suppliers fix problems identified during sanitary surveys and also assist with understanding and complying with public notice requirements.

Please contact the following Department staff with questions:



- For questions about sanitary survey activities and communications, Tyson Ingels, Lead Drinking Water Engineer, at 303.692.3002 or tyson.ingels@state.co.us.
- For questions about violation tracking and public notice, Nicole Graziano, Compliance & Enforcement North - Unit Manager at 303.692.3258 or nicole.graziano@state.co.us
- You can also request free coaching assistance at the following link:
<https://www.colorado.gov/pacific/cdphe/drinking-water-training-opportunities>.

To download the full text and details of the regulatory requirements (Regulation 11), please visit <https://www.colorado.gov/pacific/cdphe/water-quality-control-commission-regulations>. To be added to our email list for announcements of upcoming training opportunities, please register: <http://mailman.listserve.com/listmanager/listinfo/co-h2o-info>

cc: Drinking Water File PWSID

