

DRINKING WATER PROGRAM - TRIENNIAL REVIEW TOOL

Local Public Health Authority (LPHA):

Administrator:

Participants:

Date:

Reviewer:

REQUIRED PROGRAM SERVICES – BASE FUNDS

Criteria for Compliance	Compliance		Documentation / Comments	F/U Date
	No	Yes		
<p>1. Emergency Response: The LPHA shall respond to drinking water emergencies and waterborne disease outbreaks and maintain a current emergency response plan.</p> <p>(Citations: ORS Chapter 448, Water Systems; State/EPA Agreement)</p>				
<p>2. Independent Enforcement Actions: The LPHA shall take independent enforcement actions against public water systems serving licensed facilities. This includes restaurants as specified by DHS policies (dated October 26, 1995) for violations of maximum contaminant levels and monitoring and reporting requirements. The LPHA shall report these actions and water system status to the DHS Drinking Water Program as specified in the Drinking Water contract.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

*Department of Human Services - LPHA Drinking Water Contract

Form revised 8-6-2009

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	No	Yes		
<p>3. Inventory: Maintain access to and update the DHS Drinking Water Program's computer database (SDWIS) inventory records of public water systems as changes to these data become known to the LPHA.</p> <p>(Citations: ORS Chapter 448, Water Systems; State/EPA Agreement)</p>				
<p>4. Technical Assistance: The LPHA shall respond to requests from water systems for information on and interpretation of regulatory requirements. The LPHA shall respond as appropriate or as requested by the DHS Drinking Water Program to water system complaints and to routine requests for regulatory or other assistance by water supplies.</p> <p>(Citations: ORS Chapter 448, Water Systems)</p>				

REQUIRED PROGRAM SERVICES – INVOICED FUNDS

Criteria for Compliance	Compliance		Documentation / Comments	F/U Date
	No	Yes		
<p>1. Investigation of Water Quality Alerts: The LPHA shall investigate water quality alerts for detections of regulated contaminants at those water systems covered under the Drinking Water contract and according to the protocol outlined in the contract.</p> <p>A. The LPHA shall consult with and advise the water system operator on actions to assure that follow-up sampling is completed, and assure that any confirmed water quality violations are resolved.</p> <p>B. The LPHA shall advise the operator on carrying out public notification and/or advisories to users on protective actions that may necessary, or as requested by the DHS Drinking Water Program.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

Criteria for Compliance	Compliance No Yes		Documentation / Comments	F/U Date
<p>2. Investigation and Resolution of Significant Noncompliers (SNCs): The LPHA shall contact and provide assistance to those water systems covered under the Drinking Water contract that are significant noncompliers with drinking water standards. The EPA’s definitions for SNCs apply.</p> <p>A. Within 30 days of notification of a system’s SNC status by the DHS Drinking Water Program, the LPHA shall:</p> <ol style="list-style-type: none"> 1. Contact the water supplier, determine the reasons for all aspects of noncompliance, and inform the water supplier on ways to correct the noncompliance. In the process, confirm that the system’s database information is current and accurate. 2. Advise the owner/operator to carry out public notification as required. 3. Send the DHS Drinking Water Program copies of the public notices received and contact reports on LPHA follow up actions. 				

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<p>B. Within 90 days of the date a system is designated as a SNC by the DHS Drinking Water Program, the LPHA shall:</p> <ol style="list-style-type: none"> 1. Determine that the subject water system's violations or non-compliance has been addressed using an enforcement response procedure as defined by the EPA, and submit documentation of the return to compliance, OR 2. Determine that the subject water system needs an enforcement action by the DHS Drinking Water Program. Prepare and submit a written request for an enforcement action, including the LPHA's evaluation of the reasons for noncompliance. The request shall include the current owner's contact information, a draft compliance schedule listing corrective actions required, and a proposed deadline for each action. LPHA shall distribute a copy of the request to the person(s) responsible for the water system's operation. <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

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<p>3. Water System Surveys: The LPHA shall conduct surveys of EPA water systems as scheduled by the DHS Drinking Water Program. Non-EPA systems, if covered under the Drinking Water contract, shall be surveyed every five (5) years, or as otherwise directed by the DHS Drinking Water Program. The content of the surveys shall include all items outlined in the contract.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p> <p>*Department of Human Services - LPHA Drinking Water Contract Form revised 8-6-2009</p>				

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	No	Yes		
<p>4. Violations: The LPHA shall provide assistance to those water systems covered under the Drinking Water contract to resolve monitoring and reporting violations for bacteriological, chemical, and radiological contaminants, and for surface water treatment violations when applicable.</p> <p>A. Contact the water supplier, determine the reasons for noncompliance, and provide advice to the subject water system operator on appropriate actions to assure that violations are corrected in a timely manner.</p> <p>B. Provide copies of contact reports to the DHS Drinking Water Program regarding follow-up actions to resolve the violations. Resolution of violations is demonstrated when sample results appear on the safe drinking water database (SDWIS) confirming that appropriate samples were taken and received by the DHS Drinking Water Program in a timely manner.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

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<p>5. Emergency Response Plans: The LPHA shall assist water suppliers in completing their Emergency Response Plans and assure that completed plans meet DHS Drinking Water Program standards.</p> <p>(Citations: ORS 448.160 Emergency Plans; OAR 333-061-0064)</p>				
<p>6. New Water Systems: As existing water systems that are not in the DHS inventory are discovered, they shall be inventoried using the forms designated by the DHS Drinking Water Program in its Water System Survey Reference Manual (July 1999). The documentation shall be provided to the DHS Drinking Water Program within 60 days of identification of the system. Alternatively, a water system survey may be performed to collect the required inventory information, rather than submitting the aforementioned forms.</p> <p>(Citations: ORS Chapter 448, Water Systems)</p>				

SUPPLEMENTAL PROGRAM SERVICES – INVOICED FUNDS

These additional activities are eligible for Invoiced Funds payments when the Required Program Services using Invoiced Funds are completed or current. SNCs and violations must be resolved or making adequate progress towards resolution, and the number of sanitary surveys completed must be adequate and include only those scheduled by the DHS Drinking Water Program. The LPHA must also maintain a good record of prompt responses to alerts.

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	No	Yes		
<p>1. Follow-up on Significant Deficiencies as Noted on Water System Surveys: On-site visit(s) between surveys to assure that significant deficiencies have been resolved or adequate progress is being made towards resolution. Deficiencies may include but are not limited to: well or spring construction, disinfection, treatment, storage or pressure tanks, distribution, monitoring, and management.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				
<p>2. Plan Review Inspections: On-site visit to determine conformance to engineering plans reviewed and approved by the DHS Drinking Water Program. Items needing follow-up may include: new water sources, treatment facilities, storage, and water mains.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

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<p>3. Post SNC Follow-up Work: Assistance provided to water systems during the six-month period after achieving full compliance on SNCs to assure the systems remain in compliance with MCL and monitoring and reporting requirements. For example, corrosion control treatment is installed but has to be monitored by taking daily readings of certain water quality parameters. Adjustments in the treatment process may be indicated based on the testing results.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				
<p>4. Customized and Negotiated Work: Special project work required or requested by the DHS Drinking Water Program, or as suggested by the LPHA, to maintain safe and efficient public water system operations. For example, may involve such activities as special testing in an area with elevated nitrates or working with two or more public water systems regarding consolidation or purchase of water from another public water system.</p> <p>(Citations: ORS Chapter 448, Water Systems; 40 CFR, Chapter 1, Part 142 National Primary Drinking Water Regulations Implementation. Subpart B, primary enforcement responsibilities; EPA Primacy Regulations)</p>				

Comments: