

State of Connecticut  
Department of Public Health  
Drinking Water Section

Annual Capacity Development Report  
for the period  
July 1, 2004 – June 30, 2005



Keeping Connecticut Healthy  
[www.dph.state.ct.us](http://www.dph.state.ct.us)

Governor M. Jodi Reil  
Commissioner J. Robert Galvin, M.D., M.P.H.

September 2005

## **Introduction:**

The Federally approved Capacity Development Strategy for Connecticut has served to consolidate all programmatic activities within the Drinking Water Section (DWS) into a more cohesive, consistent effort. In establishing a directive to support viable systems and eliminate those systems unable to sustain acceptable levels of capacity, the Capacity Development Strategy has defined the direction toward which the DWS's resources can be applied effectively. It has also identified an intricate weave of program activities critical to its implementation.

As such, the Strategy has been determined to be positive and it is recommended that it be maintained as approved. Modifications to the Strategy, as indicated in this report, are for the most part, changes in emphasis, or prioritization of certain components, not redirections or elimination of elements. Significant from this review is the necessity that certain program areas will need emphasis as the DWS moves forward. These areas include:

- ❖ Emphasis on outreach activities due to its demonstrated, positive contribution to local health departments, municipal officials and the general public.
- ❖ Emphasis on outreach, compliance and technical assistance to all regulated Public Water Systems (PWS).
- ❖ Emphasis on operator certification activities as supportive of professionalizing operators capable of addressing our new national infrastructure security concerns.
- ❖ Emphasis on data management/data entry procedures and processes critical to efficiently processing compliance determinations and supporting enforcement efforts.
- ❖ Emphasis on staff and local health director training to support Non-Community system program activities.
- ❖ Emphasis on providing technical assistance to the Water Planning Council's technical review in the areas of the Water Utility Coordinating Committee (WUCC), the Certificate of Public Convenience and Necessity (CPCN) process and Water Supply Planning.
- ❖ Consideration of new mechanisms that will allow small PWSs easy access to Drinking Water State Revolving Fund (DWSRF) low interest loans.

## **I) Implementation Activities**

The State of CT, Department of Public Health (DPH), conducted the following activities in accordance with Section 1420(C) of the Safe Drinking Water Act and Amendments during state fiscal year ending June 30, 2005:

### **A. Methods or Criteria to Identify and Prioritize PWSs in need of Technical, Managerial and Financial (TMF) assistance. (Section 1420(C)(a))**

As stipulated in our original strategy, the DPH intends to prioritize systems for assistance using compliance data in the Safe Drinking Water Information System (SDWIS) State database and from results of sanitary surveys. The selection of PWSs requiring additional assistance is primarily accomplished by two mechanisms. The first is the sanitary survey and the resulting compliance determinations, and the second is the level of enforcement activity as a result of maximum contaminant level (MCL) exceedance and/or a monitoring/reporting (M/R) violation. Proactive determinations of which systems require additional technical assistance is identified through the PWS's ability to respond to compliance requirements for prescribed regulation implementation (see attachment #1). These targeted systems are then addressed by various compliance related training and one-on-one technical assistance activities as defined in Section C of this report.

The failure of an existing PWS to comply with either the Department of Public Utility Control (DPUC) or the DPH regulations could require joint hearings to determine the PWS's economic viability. If it is determined that the PWS is not viable, the DPUC, with DPH's consultation, may order the acquisition of the PWS by the most suitable entity. This is a two-step process; the first step is a thorough evaluation of the PWS's ability to provide TMF capacity. The second is the determination of possible restructuring or acquisition by a more reliable and sound PWS.

The "take-over" process has typically resulted in more viable systems or the elimination of an existing PWS. Non-viable PWS's tend to chronically fail to achieve compliance in areas such as monitoring for contamination issues, difficulty meeting the more comprehensive treatment requirements, infrastructure deficiencies and financial

constraints due to the smaller customer base. The process has proven to help prevent system failure, water service interruption, lack of monitoring and/or reporting, etc. Elimination of non-viable systems has had positive impacts on application of resources, risk reduction and compliance success. Successful “take-overs” also result in a deterrent to other PWS’s operating in inefficient or ineffective manners.

**B. Identification of Factors that Enhance or Impair Capacity (Section 1420(C)(c))**

Factors within this element have not changed from the original strategy, however, the activities of the Water Planning Council, consisting of a diverse group of industry, environmental and state/federal agencies, has assessed capacity development issues. The Water Planning Council was established to prepare a report, after evaluating 11 issues, one of which deals with TMF issues of PWS’s. Although draft reports are being prepared, the process has spawned an excellent myriad of suggestions that may lead to the DWS’s update or modification of some of its original Capacity Development Strategy.

Sanitary surveys, vigilant enforcement and “take-over” proceedings are tools to assist in either maintaining viable PWS’s or initiatives that act as deterrents to non-viable PWS’s.

**C. How States are Using the Authorities and Resources of the SDWA (Section 1420(C)(c))**

Connecticut State legislation and regulations provide authority to the Connecticut Department of Public Health through its Drinking Water Section the ability to conduct the capacity related elements of its drinking water program. These components of the program, along with the strategic elements of the Certificate of Public Convenience and Necessity, and the Connecticut General Statute 16-262 “take-over” processes provide the programmatic elements supporting capacity development. The Connecticut General Fund, the Environmental Protection Agency’s (EPA) Public Water Supply Supervision Program (PWSSP) Grant, and the Drinking Water State Revolving Fund (DWSRF) Set-asides provide financial support for implementation of the capacity elements. The State of Connecticut uses authorities and resources of the SDWA as follows:

**Compliance Section Activities**

The DWS Compliance Section has been organized to split Section functions between two units, the Monitoring, Reporting & Enforcement (MRE) Unit and the Implementation & Response (I&R) Unit. These two units work under the supervision of a Section Supervisor and ensure that all public water systems are monitoring and reporting in accordance with the Safe Drinking Water Act (SDWA) and State regulations. The units also ensure that enforcement actions are implemented to bring the public water systems back into compliance with the applicable rules and regulations, and are surveyed to verify that compliance is being sustained.

Field engineers in the Implementation and Response Unit conduct a review of the technical, managerial and financial capacity elements for existing Community water systems (CWS) and Non-Transient Non-Community (NTNC) water systems as part of the sanitary survey process. A review of each system’s water quality results, compliance history, system size, and historical technical infrastructure deficiencies is reviewed prior to the site visit. Triggers of capacity weaknesses or failures include:

- MCL violations
- Monitoring and Reporting Violations
- Water outages
- Consumer Complaints
- Unaddressed infrastructure deficiencies identified in previous sanitary surveys
- Lack of a certified operator

Any identified triggers are discussed with the water system during the sanitary survey to identify the cause of the capacity weakness or failure. Technical assistance is provided, along with additional capacity assistance resources, to systems during the sanitary survey and with the sanitary survey report. Systems are typically given 30 days to send a formal response to DWS addressing their violations and other capacity deficiencies. Compliance meetings are scheduled with systems that fail to respond or fail to provide a sufficient response to their sanitary survey

report. Compliance meetings are typically used to determine agreeable compliance dates between DWS and the water system for the preparation of a formal consent agreement. If a consent agreement cannot be achieved or the water system does not wish to participate in a compliance meeting, the DWS refers the matter to the DWS Monitoring Reporting and Enforcement unit to initiate formal enforcement actions.

Small CWS and NTNC systems are always encouraged to pursue interconnections with existing larger CWS when feasible interconnections exist as a method of resolving their violations and capacity deficiencies. Public water system consolidations that occurred during the period of 7/1/04 through 6/30/05 include 11 CWS, 10 NTNC, and 25 Transient Non-Community (TNC) systems.

From 7/1/04 through 6/30/05 the DWS conducted 95 sanitary surveys of CWS and 151 sanitary surveys of NTNC systems, which resulted in technical deficiencies. The following illustrates violations as a result of sanitary surveys conducted.

Community Water Systems:

- # of systems with Acute MCL Violations/ # Sanitary Survey Inspections Conducted: 3/3
- # of systems with Non-Acute MCL Violations/ # Sanitary Survey Inspections Conducted: 20/15
- # of systems with Acute or Non-Acute MCL Violations that have been eliminated through consolidation 1

Non-Transient Non-Community Public Water Systems:

- # of systems with Acute MCL Violations/ # Sanitary Survey Inspections Conducted: 4/4
- # of systems with Non-Acute MCL Violations/ # Sanitary Survey Inspections Conducted: 43/29
- # of systems with Acute or Non-Acute MCL Violations that have been eliminated through consolidation 1

There were 95 CWS and 151 NTNC existing system capacity assessments made. Systems identified as deficient in technical capacity include 19 CWS and 84 NTNC systems.

One or more monitoring and reporting violation in a 12-month period is used as a trigger of deficiencies in managerial and possibly financial capacity. During the period of 7/1/04 through 6/30/05, 152 CWS and 135 NTNC systems were identified as deficient in managerial and/or financial capacity.

Furthermore, the Compliance Section has turned over, through the viability review and hearing process, two (2) troubled community water systems to the ownership and management of viable large water systems. Also, the Section's non-community staff continued its initiative of training local health authorities statewide in various drinking water issues related to non-community and small community PWSs. Under this initiative, staff engineers provided hands-on sanitary survey training to individual local health departments (LHD) including Farmington Valley Health District, Torrington Area Health District, Northeast District Department of Health, Chesprocott Health District, Quinnipiac Valley Health District, Naugatuck Valley Health District, Pomperaug Health District, Uncas Health District, Wallingford Health Department, New Milford Health Department, LedgeLight Health District, Greenwich Health Department, East Shore Health District and Eastern Highlands Health District. During these training events Sanitary Engineers from the Section performed on-site inspections of TNC systems in the respective jurisdictional areas of each health department. These inspections focused on food service establishments for which local health departments license and have enforcement authority with regard to well construction and the purity and adequacy of the water supply as outlined in Section 19-13-B42(g) of the Regulations of Connecticut State Agencies (RCSA). Where appropriate, local enforcement actions were taken to correct water system deficiencies identified in these sanitary surveys. These efforts were initiated in an attempt to provide LHDs the necessary training to assist the DWS in identifying and correcting deficiencies at these small public water systems. In many instances LHDs played a significant role in getting many of these TNC systems connected to Community Public Water Systems and abandoning their on-site wells. This type of training continues to be a successful process in raising local attention to drinking water issues, gaining assistance from local authorities in obtaining compliance, and helping to assure that new PWSs are constructed to proper design standards.

## **Description of the Certificate of Public Convenience and Necessity (CPCN) Process for the Creation of New Public Water Systems**

The DPH and the DPUC jointly administer the CPCN process under authority of Connecticut General Statutes (CGS) Section 16-262m. New proposed PWSs and existing PWSs undergoing expansion are required to apply for a CPCN. This is commonly referred to as the “certificate process.” The process restricts the creation of new small water systems by encouraging feasible interconnections with existing PWSs and by establishing a set of regulations for approval of the proposed water system’s design and management if an applicant cannot interconnect with an existing utility.

The entire CPCN application is separated into three phases: Phase I-A, Phase I-B, & Phase II. The Phase I-A application requirements are for review of the proposed sources of supply to serve the proposed project (i.e. well site locations).

The next step in the process is to submit the requirements of Phase I-B. The Phase I-B requirements are for review of the developed sources of supply. This part of the process reviews the well construction, well water yield, and water quality. All sources must have satisfactory water quality and be able to supply a sufficient amount of water to meet the system requirements.

The final step in the process is to submit the requirements of Phase II. The Phase II requirements are for review of the design of the water distribution system. This part of the process includes review of the storage, pumping facilities, distribution piping, and if necessary, treatment facilities.

Part of the certificate process also reviews and evaluates whether the applicant for the proposed project understands the responsibility and requirements involved with owning and operating a PWS. That is, whether the applicant has the ‘capacity’ to develop and maintain a viable PWS that will remain in compliance with all applicable regulations once the water system is operational. Overall capacity is separated into three categories – technical, managerial, and financial. These three categories are interrelated in the overall operation of a water system through short- and long-term planning, assurance of sufficient supply and infrastructure for the future, and meeting regulatory responsibilities in order to provide safe and adequate drinking water.

In the past, formal application forms were not available for submitting information within this process. Over the past year, DPH and DPUC staff have worked together to develop application forms for each phase of the CPCN process. Separate sets of forms were developed for Community PWS and Non-Community PWS projects. These forms identify all the information necessary for review of each phase. The regulations associated with CPCN review set maximum amounts of time allowed for review of each Phase once a complete application is received. The intent of these forms is to shorten the lag time for review by ensuring that all necessary information is initially submitted completely.

### **Capacity Assessments for New Public Water Systems**

During the time period 7/1/04 – 6/30/05, 15 Phase I-A CPCN projects were received and assigned docket numbers by the DPUC for initiation of review. Capacity assessments were initiated on those 15 projects. Seven (7) are CWS, two (2) NTNC, and six (6) TNC systems. In addition, one existing non-public water system was evaluated for capacity in anticipation of it becoming a TNC PWS.

Thirteen (13) development projects were screened to determine if the projects would result in the creation of PWSs and, if so, were feasible interconnections with existing CWSs available. It was determined that eight (8) proposed water companies could not be feasibly served by a main extension or interconnection with an existing CWS. It was also determined that those eight (8) projects would result in the creation of PWSs and were referred for initiation of the CPCN process, however, not all developers submitted their CPCN Phase I-A applications before 6/30/05. One screening determined that the project was not creating a new PWS. Four (4) screenings resulted in proposed PWSs connecting to adjacent existing PWSs. Two additional community CPCN projects were reactivated from previous submissions. One additional project for a new community system did not meet the criteria for a CPCN.

The DWS completed 19 capacity assessments for new PWSs during the period of 7/1/04 through 6/30/05. Fifteen (15) were from CPCN, one (1) was from a non-public system change to a public water system, one (1) was a satellite system of a large utility, and two (2) were reactivations. Of these capacity assessments, 10 were CWS, 2 NTNC, and 7 TNC systems. None of the 19 systems undergoing a capacity assessment were found to be deficient in technical, managerial, or financial capacity.

### **Project Review Summary for New and Existing Public Water Systems**

There were a number of reviews made of new PWS & existing PWS construction projects during the period of 7/1/04 through 6/30/05. There were 19 new PWS projects received. There were 138 existing Community projects received; at least 24 of these were for water main extensions, and seven (7) of those were not assigned for review due to incomplete applications. There were 63 NTNC projects received, at least four (4) of which were water main extensions; one (1) was not reviewed since the PWS chose not to pursue. There were 26 TNC projects received, of which two (2) were not assigned for review due to incomplete applications.

There were seven (7) total approvals granted for new PWS, of which three (3) were CWS, three (3) NTNC, and one (1) a TNC system. There were four (4) total denials given for proposed new PWSs. Reasons for denial was due to feasible interconnections with existing PWSs. Three (3) new CWS were created during the period of 7/1/04 through 6/30/05, and four (4) existing CWS were discovered. Three (3) new NTNC systems were created and 16 existing NTNC systems were discovered, one (1) has since been inactivated. Attachment #2 illustrates a new systems report since 2002, and shows which systems are currently identified on the Significant Non-Compliers (SNC) List.

The four denied systems are as follows:

Project # 2005-0114	CT1430544- Eastside Commons
Project # 2005-0093	CT0189814- 235 Federal Road
Project #2004-0037	CT0230294- 250 Albany Turnpike
Project # 2005-0013	CT0199083- Learning Clinic 2

At least 24 water main extension projects were received from Community PWS. These extensions may have consolidated some existing systems through interconnection or prevented the creation of new systems by extending the water main to the development project.

At least four (4) water main extension projects were received from Non-Transient Non-Community PWS. These extensions may have consolidated some existing systems through interconnection or prevented the creation of new systems by extending the main to the development. At least two (2) of these connected NTNC systems to Community PWS, which resulted in the inactivation of the NTNC systems.

### **Public Water System Assistance**

To assist the public water systems in sustaining their compliance and enhancing their capacity, we have developed numerous forms and technical sheets that were made available to all public water systems in several methods, such as regular mail to each system, posting on the DWS Web page, on-site meetings, phone calls, and during routine sanitary survey visits.

These technical sheets and forms are designed to:

- 1) Assist the PWSs in reporting contact and emergency information
- 2) Guide the PWSs in understanding the annual monitoring requirements
- 3) Summarize the annual testing requirements into a simple easy to read schedule
- 4) Guide PWSs on completing a sampling plan and selecting the most representative sampling points
- 5) Provide PWSs with instructions & templates on the CCR requirements & distribution
- 6) Instruct PWSs about the Filter Backwash Rule, and assist in developing forms for record-keeping
- 7) Guide the PWSs on the requirements of the radionuclides rule

## **Capacity Development at Public Schools**

The initiative of ensuring Capacity Development at public schools across the state has continued, and many schools have opted to install completely new facilities. Thirty-eight (38) schools were identified as needing completely new systems. Of these, 24 have completed these projects and the remaining 14 are under DOH consent order and will be completed in the near future. Sixty-two (62) schools were identified as needing major improvements, of which 44 schools have completed those improvements and 18 schools still need to make major improvements. Twenty-three (23) schools have implemented consolidations. Seventeen (17) of these schools were consolidated by connecting to larger community public water systems, while six (6) schools were consolidated into two regional campus type systems. DWS staff will continue to assist these systems and will continue as necessary to link them with the Schools Facilities-Grants Unit under the Division of Grants Management, State Department of Education. Schools who sign DWS Consent Orders are eligible for grants ranging from 20-80% (based upon the respective town/district's reimbursement rate) of the entire project to correct both existing CT PHC violations and system capacity deficiencies. This school capacity project will continue to be prioritized by DWS over the next few years until all public schools have adequate capacity.

### **31% of the Drinking Water State Revolving Fund (DWSRF) Activities**

The DWS also utilizes the full set-aside of 31% available from the DWSRF to fund various initiatives that would not have been otherwise funded by either state or federal funds. The summary of set-aside funds is as follows:

- 4% - Administration of the DWSRF
- 10% - Augmentation to the existing Public Water Supply Supervision Grant
- 2% - Small system technical assistance through outreach activities
- 15% - local assistance activities which include 5%-wellhead protection activities; and 10%-capacity development activities

### **4% - Administration of the DWSRF**

The majority of funds from this set-aside paid salaries and associated expenses of personnel administering the DWSRF program. The state is currently not charging fees to supplement available set-aside funds. Implementation of the DWSRF has required work to the following agencies staff: 1) Department of Public Health 2) Department of Environmental Protection, 3) Office of the Treasurer, 4) Department of Public Utility Control and 5) Office of Policy and Management. The latter does not receive set-aside funding.

The following administrative activities have been accomplished:

- Prepared Capitalization Grant Application
- Development of program documents (i.e. Bond Sale documents)
- Development of Program procedures
- Development of work plans
- Development of comprehensive list of projects
- Development of Accounting Management Reports
- Completion of DWSRF program audit
- Legal Notices in the local media
- Evaluation of DWSRF Program performance
- Solicitation of applications
- Project selection and development of Intended Use Plan
- Evaluation of eligible public water systems for technical, financial and managerial capacity.
- Conducted Public Hearing on Priority List of Projects and Intended Use Plan
- Meet with stakeholders

- Other administrative activities as necessary (authorized travel, etc.)

### **2% - Small System Technical Assistance Activities**

The funds from this set-aside were used to provide small system technical assistance through various outreach activities. The following are some activities completed from the period of July 1, 2004 through June 30, 2005 using the Small System Technical Assistance Set- Aside:

- Development of application forms & instructions for the CPCN process
- Development of Screening Application for Water Companies for determination of creation of new water company
- Revision of the Intro to Water Business brochure
- Attended the SWP May 10<sup>th</sup> conference
- Gave overall assistance for submitting PWS projects

### **5% Wellhead Protection Set-aside**

The following are some accomplishments of the Wellhead Protection Set-Aside:

Developed and Initiated Implementation of the Five-year Strategic Plan for Source Water Protection. A strategic plan for the movement from assessment to protection was developed. First drafted in August 2003, this plan was in a final draft form in November 2003, revised November 2004, and due to be updated in November 2005. The action items within the plan set the course for the Source Water Protection Unit within the Drinking Water Section. This plan has been shared with all stakeholders in numerous forums and presentations across the state. In the summer of 2004, both EPA Region I and EPA Headquarters have endorsed the plan's goals and objectives. The goals and objectives are closely linked to EPA's five-year strategic planning goals for drinking water source protection. In 2004, staff of the source water protection unit met with staff of both Region I and Headquarters to outline details contained within the plan. This plan is a living document that will be continuously updated and enhanced. The plan will be updated at least on an annual basis, and will continue to guide the SWP Unit in meeting the stated goals and objectives.

Participated on GWPC/EPA HQ Pilot Project for SWP Measures Reporting. During 2004 the DWS SWP Unit staff participated as a member of a Pilot Project for the Groundwater Protection Council and EPA Headquarters to review technical methods of electronic transfer of source water protection measures data. Connecticut was one of three states chosen specifically to work through the entire data transfer process. The SWP Unit's data transfer to EPA Headquarters was successful.

Participated in the review of the Interim Standard Operating Procedure for the secure transfer of DWGIS source water area data layer. In the fall of 2003 and into 2004, the SWP Unit helped to formulate the national EPA position concerning the security and oversight of the GIS SWAP source water area data layer. EPA Headquarters wished to gain direct access of all states source water protection data layer in order to share with other federal agencies. The DWS was instrumental in guiding the final draft position of EPA. A draft procedure for the secure transfer of the DWS's GIS was also developed. Drinking water source water protection area shape files were transferred to EPA Washington for their use pursuant to the Interim SOP. Since the transfer of information, all requests for GIS information from federal agencies have been sent to EPA HQ consistent with the interim SOP. Participated on the Governor's Ordered Interim GIS Council that is charged with developing methods to share GIS data.

Participated on EPA HQ SWP Measures Workgroup. Continue to participate as a member of the National Source Water Measures Workgroup. Initiated in the winter of 2003 and continued through 2004, this group has held conference calls to discuss, comment and guide the measurement of drinking water source protection actions and activities. This group will assist in setting the national direction on measuring the minimized risk to public health due to source water protection actions. Provided input and comments on the National Source Water Protection Guidance that was finalized in March 2005.



Drafted and continued to develop regulations for an evaluation of drinking water source protection measures.

Required under Public Act 02-102, the SWP Unit initiated and continued through 2004 and 2005 to draft and develop regulations to add a new section to the existing individual water supply plans emphasizing the use of the SWAP assessment information in an evaluation of drinking water source protection measures. These regulations were developed along with the CT Section AWWA Source Water Protection Committee. The regulation concepts were shared with members of the Drinking Water Source Protection stakeholders group. During 2004, the regulations underwent an extensive internal review and reformatting. Forms were drafted for use as a tool to assist public water systems in meeting the new regulation requirements. The final draft of the regulations was shared directly with the Drinking Water Source Protection stakeholders at the April 2005 meeting. No comments were received from the stakeholders group, and as of June 2005, a final draft regulation is being prepared to initiate the formal state adoption process.

Redeveloped the drinking water source protection stakeholders group. Utilizing the SWAP technical and citizen advisory group members as a base, a Drinking Water Source Protection Stakeholders group was developed. Forty-five stakeholder groups have volunteered to be members, out of seventy groups initially contacted. Two stakeholder group meetings have been held (April 2004, and April 2005) since the time of the group's redevelopment. At the April 2005 meeting, thirty-five members attended. Agenda items included an outline of the DPH source water protection unit staff and their functions, a discussion and outline of the proposed final regulations for the development of a source water protection evaluation within the individual water supply plans. Added new groups to the stakeholders group that represent town land use decision makers.

Redeveloped the requirements of RSCA 19-13-B102(b). Reviewed thirty-three (33) land use survey reports as required to be produced under RSCA 19-13-B102(b). Sent review letters concerning each report outlining the review of this process by the SWP Unit in the Spring 2005 and the links of this program to the new proposed regulations for a source water protection evaluation within the water supply plans. Outlined to the public water systems of the potential for a civil penalty when reports are not received pursuant to regulation requirements. Developed a new proposed report form for field data collection for consistency with SWAP reporting. Continued discussions with the CT Section AWWA Source Water Protection Committee concerning the need to link these processes and requirements.

Initiated the education and training strategy concerning the SWAP assessment reports and drinking water source protection. Planned for and initiated the development of an educational outreach strategy to focus local decision makers on SWAP source water protection areas as well as review potential effects of proposed development on existing sources of supply. This strategy focuses on education of local decision makers. Dedicated one staff person in July 2004 within the SWP Unit to work on education and training initiatives. Developed a power point source water protection-training program for certified water treatment operators and provided nineteen (19) training presentations during state fiscal year 2005. Four (4) new source water protection educational handouts were developed.

May 10<sup>th</sup> Workshop. Planned, developed, and held a one-day Workshop on May 10<sup>th</sup> 2005, with the assistance of an EPA HQ grant and partnerships with numerous stakeholders. Over 200 people attended the Workshop held in southeastern Connecticut that emphasized drinking water and public health protections. Local land use decision makers were targeted for the workshop. CADMUS assisted with development of the agenda and workshop format. Representatives from state agencies, regional planning organizations, town planners, local town land use boards and commissions, environmental groups, and other stakeholders attended the forum. Reviews and comments received were positive with many commenting on the need for this type of forum in other parts of Connecticut.

Redeveloped a standard review process for local proposed development projects. Developed standard forms and standard review procedures for the review of proposed development projects. The standard review process includes a GIS determination of project location versus SWAP delineated source water areas. This process links numerous state and local agencies (i.e. DEP, Siting Council, DECD, DPW, DOT, OPM, local land use commissions) projects to source water protection. The SWP Unit conducted thirty-six (36) assessment reviews in state fiscal year 2005. Reviewed a number of large proposed development projects

and provided comments and recommendations directly to municipal governments. This included reviews of developments within public water supply watershed areas located within the towns of Canton, New Hartford, Ridgefield, and Ledyard.

DEP Pesticide Permits. Operating under a 1994 Memorandum of Understanding (MOA) with DEP, the source water protection unit reviewed and provided oversight of seventy-seven (77) aquatic use pesticide permits in calendar year 2004 for use within public water supply source water areas. Another four (4) permits were very controversial and were not issued by the DEP due to the proposed use of chemicals not allowed under the MOA. Continued to track potential linkages between the two programs concerning the dual jurisdictions. Worked to refine the requirements within the MOA to address concerns for non-reporting of water quality information and timely reporting of planned applications. Developed a draft form to assist in tracking aquatic applications. Initiated discussions in June 2005 with EPA and DEP to develop greater linkages between the two programs concerning the potential study of the cause and effect of pesticide use within drinking water supply source protection areas.

Developed and utilized an enforcement procedure. Utilizing public health source protection laws that have existed since the early 1900s, the SWP Unit developed an enforcement initiative concerning the protection of drinking water quality for all sources of public drinking water. A draft on-site Notice of Violation (NOV) report was prepared for field inspection and same-day notice of violations. This on-site NOV will become part of a formal process, linking an on-site inspection to compliance with existing source water protection laws and regulations. This process will continue to develop with a formal standard operating procedure planned. Initial discussions have taken place with the necessary regulatory agencies and other stakeholders in order for the DPH to receive appropriate and timely notice. Two (2) department orders under the authority of CGS 25-34 were issued during the summer of 2004 for activities that threatened public health and drinking water quality. These Orders are active through the end of the reporting period; one has complied with the Order. The other challenged the Order with negotiations. These negotiations continue with a possible settlement on the development of a critical control management plan for the site. Follow-up with both Orders continues with numerous meetings held due to long standing issues. Pursued two new areas of concern for the protection of drinking water sources in the towns of Woodbury and Southbury. Potential Orders/consent orders are being pursued in both cases. A review and possible revisions to the existing statutes CGS 25-34 and 25-32g has been initiated to strengthen the oversight of the DPH when sources of supply are threatened.

Drafted new process for siting of proposed wells. The SWP Unit, working with other units within the DWS, developed a well site application form. A formal standard process has been initiated, with a formal standard operating procedure drafted. The SWP Unit continued to review the well siting process as well as refine the procedures in place for the protection of public health. A new format for the certification of public water supply well sites was developed. A final Standard Operating Procedure (SOP) will be in place in the fall of 2005. Revisions to the well siting regulations were initiated in May 2005. The SWP Unit reviewed twenty-two (22) proposed well sites during state fiscal year 2005. A number of sites involved numerous site visits and referrals to the compliance unit for formal enforcement actions due to system deficiencies noted during field site reviews.

Presented drinking water source protection at numerous forums/meetings. The SWP Unit presented the new drinking water source protection mission and strategic plan concepts at numerous forums/meetings throughout the state during fiscal year 2005. Groups presented to include: ASRWA, Regional Planning Organization Executive Directors, CT Section AWWA/CWWA, DPH Stakeholders Group, various chief elected officials, CT Well Drillers Association, CT Section AWWA Vendor Expo, United Way Environmental Forum, Watershed Coalition and the Pomperaug River Watershed group.

Initiated linkages between SWAP and source water protection to various stakeholder processes and regulations. Initiated discussions with numerous stakeholder groups within state and regional agencies. Included in these linkages was a review of the seventy-seven DEP pesticide use permits and ongoing discussions of the existing MOA for aquatic pesticide use within drinking water supplies; initial discussions with the DECD, DOA, DPS, DOT, NEMO program and NRCS Soil Conservation Service about the SWP Unit; a review of procedures concerning spill reporting and notification to DPH with DEP's UST/LUST and oil and chemical

spill response programs; a review of procedures and ongoing discussions concerning the transfer of data and GIS layers between DEP and DWD; a review of the proposed DEP/EPA/DPH MOUs concerning UIC regulation in CT; and a review and ongoing discussion with the DEP Storm Water enforcement unit in order to link actions and enforcement processes. Initiated detailed discussions with EPA in June 2005 to formalize direct linkages between the Clean Water Act (CWA) and Safe Drinking Water Act (SDWA) programs. Participated in twenty-four (24) meetings with various stakeholders during 2004. Developed a proposal to create a new lead staff person to concentrate on the linkages between CWA and SDWA programs, with an emphasis on watershed management planning. This new staff person will be responsible to create formal program linkages that would include development/refinement of MOUs.

Initiated redevelopment of standard operating procedures for both water company land reviews and recreational land use permitting. Began a process of reviewing the requirements under existing state statutes and regulations concerning change of use of water company land and recreational use permitting in order to institute a structured and simplified approach. Initiated discussions to link the water company lands laws to public water supply land use management plans. During 2004 and 2005, met with large public water systems to discuss streamlining the permitting processes. Reviewed fourteen (14) water company lands permit applications, ten (10) recreation permits, ten (10) annual reports for recreational activities, three (3) class III land determinations and one (1) Class I determination.

Initiated the redevelopment of the SWP Unit's web site. New categories are planned that will address each major responsibility of the SWP Unit. A web page site map is planned to outline the restructuring. A new web page is planned for the fall of 2005. This would include links to all related programs and other information that would be useful for local land use decision makers.

Developed a program to review and provide education on swap assessment information with ASRWA. Met with the ASRWA to discuss future collaboration on projects concerning drinking water source protection. A program was developed in 2004 and continued into 2005 that has ASRWA field verifying the most highly susceptible small community bedrock well sources of supply. Also continued discussions concerning an agriculture initiative to work with the newly hired ASRWA staff to utilize the SWAP assessment reports in the development of watershed management plans. Provided direction to the ASRWA staff utilizing SWAP report information to set priority areas for watershed management planning for source water supplies.

Created linkages to the Septic System Regulation Program. In early 2005 the Environmental Engineering Program which has oversight of the on site subsurface sewage disposal program, hired an Environmental Sanitarian to focus on decentralized sewage system management. The following activities and initiatives are being pursued:

- Preparation of educational and training materials on decentralized sewage treatment systems. Conducting outreach to groups such as homeowners, realtors, local officials, etc. on managing decentralized systems.
- Participation with municipalities in establishing decentralized wastewater management districts and local ordinances for the upgrade and monitoring of decentralized systems.
- Partnering with DEP and DPH's Drinking Water Section on common goals such as: aquifer protection, source water protection, non-point source pollution prevention, consolidation, wellhead protection, etc.
- Promoting proper siting and design of decentralized systems to ensure protection of public health and the environment.
- Advocating funding of decentralized systems to promote upgrading of existing substandard decentralized systems and to allow municipalities to implement comprehensive management programs.
- Increased assistance to local health departments in their efforts to eliminate health hazards, nuisance conditions, and water quality impairments caused by malfunctioning onsite sewage treatment systems.
- Assist in other areas of decentralized system management that will need to be addressed in the next several years. They include: real estate transaction sewage system assessments, abandonment of large capacity cesspools (New EPA Rules).
- Pursuing grant funding to further the goals of a comprehensive management program for decentralized systems. A grant has recently been received from DEP to provide improved site investigation (soil assessment) training for local health officials.

## **Operator Certification Expense Reimbursement Grant**

The DWS has consolidated the Operator Certification Expense Reimbursement Grant into the Operator Certification Program (OCP). The DWS has had a long standing OCP and the additional Federal funding has allowed us to expand this program to NTNC systems and to institute the requirement for renewal training. The Operator Certification Program work plan now includes a DWS training program for operators. It has been long recognized that properly trained and certified water supply professionals reduce non-compliance and enforcement actions.

Operator certification problems can be a trigger for the need for capacity development assistance. There can be numerous problems with the certification of public water system operators. Some water systems are without operators. Presently, 584 of the 639 NTNC systems have a certified operator. Some common causes include failure of operators to renew their certification, Conditional (grand fathered) Operators that leave a system, change of system ownership, and termination of contracts with operators. This problem is addressed through technical assistance, followed by progressive enforcement (violation letter, order, civil penalty). Regulations are being proposed to improve notification of operator changes.

Some water systems have numerous violations. The MRE Unit refers these PWSs to the OCP. The OCP then follows up with technical assistance and plans to use this as a trigger for possible disciplinary action against operators. The OCP is working to set up a database query to automatically generate lists of systems with numerous violations or multiple systems, operated by the same operator, with numerous violations.

Water systems may have questions or appeals on enforcement actions. This could be an indication of operators not understanding the regulations. These are referred from the MRE Unit and the OCP follows up with technical assistance.

In some instances, certified operator misconduct is an issue. The department can take disciplinary actions, such as suspension or revocation of certification, for actions such as fraud, deception, negligence or incompetence. The OCP has developed a standard operating procedure for disciplinary actions against certified operators.

The following are some accomplishments of the Operator Certification Program:

- The OCP, which was established as a separate program within the Drinking Water Section (DWS) in January 2003, now has five full time staff persons. This unit also handles all items related to cross connection control.
- Robert Rivard, Supervising Sanitary Engineer, was 75% funded by the Expense Reimbursement Grant (ERG). The Department's Business Office recommended discontinuing the partial funding due to the difficulty of monitoring and tracking split funded positions. As a result, his position was switched to DWSRF (10% Program Management) funding on November 12, 2004.
- As of June 30, 2005, there were 1246 systems required to have certified operators and 24 systems without certified operators. The OCP issued 60 notifications to systems informing them of the requirement to have certified operators and issued 53 violation letters for failure to have certified operators.
- The Section took the following formal enforcement actions against systems for failure to have a certified operator: four (4) Administrative Orders, one (1) Consent Order and one (1) Notice of Violation with Civil Penalties. These systems have since come into compliance. The OCP achieved 98% system compliance

with operator certification requirements, with 50 systems achieving compliance as a result of formal and informal enforcement in 2004/2005.

- The OCP has developed a standard operating procedure for disciplinary actions against certified operators. The first action taken resulted in the voluntary surrender of an operator's certificate.
- The OCP migrated operator certification data into the Safe Drinking Water Information System (SDWIS/STATE) and the department's licensure database. This will allow for more automated certification processing, improved tracking of operator issues, division staff accessibility to current information, and improved flexibility for providing information on the Internet.
- An OCP staff person attends monthly meetings of the Connecticut Section–American Water Works Association Operator Certification Committee. This committee serves as an advisory group to the OCP and provides input on many areas including regulation development, exams, and program administration. The OCP holds meetings twice per year with trainers that review exam results and provide input on various certification issues. The OCP also receives periodic input from the Association of Boards of Certification (ABC) and the New England Water Works Association's Operator Certification Committee. Staff also represented the section on various external (Association of Boards of Certification, Connecticut Section – American Water Works Association, New England Water Works Association) committees.
- Staff has presented information on operator certification to various industry groups, such as water system owners and operators, and well drillers.
- The OCP has incorporated a training element to its program, funded by the Expense Reimbursement Grant. Two training courses were initiated, one for Small System Operators (systems without treatment) and the other for small system treatment plant operators. A total of 13 courses have been presented.
- The OCP received the Certification Program Award from ABC. This award is presented annually to one certifying authority in recognition of outstanding contribution establishing or advancing certification.

#### Cross Connection Control

- The OCP approves and participates in training for Backflow Prevention Device Testers and Cross Connection Survey Inspectors. The program administers the issuance and renewal of certificates for backflow personnel. Presently, there are 602 backflow device testers and backflow inspectors currently certified by the DPH.
- Staff reviews water systems' cross connection survey programs through reviews of annual reports and site visits.
- The OCP provides technical assistance to operators, system owners and the public on technical issues related to cross connection control by responding to telephone calls, preparing outreach materials, posting information on the division's website, and participating at technical seminars.
- Staff participates on a number of state, regional and national committees on cross connection control.

Program Initiatives (2005/2006)

- Revise and implement regulations to clarify certification requirements, to improve operator certification enforcement, to certify backflow personnel, and to clarify cross connection control requirements.
- Develop interface between the DPH licensing database and SDWIS for operator and facility data.
- Complete revision of Operator Certification Handbook.
- Develop pamphlets on operator duties and responsibilities.
- Expand operator training to other subject areas.
- Conduct evaluation site visits of courses given by other providers.
- Prepare quarterly newsletter for operators.
- Streamline review process for cross connection control survey reports.
- Conduct on-site reviews of cross connection control programs.

**D. Method of Establishing a Baseline and Means of Measuring Improvements (Section 1420©(D))**

The DWS's Capacity Development Strategy with the EPA has in effect, established baseline activities. Data is compared and analyzed via yearly reporting of qualitative and quantitative indicators to EPA. Yearly analyses are used to determine necessary program modifications. The following is the Capacity Development benchmarks for the period of July 1, 2004 through June 30, 2005.

<u>Drinking Water Benchmark</u>	<u>2004/2005</u>
1. Total number of PWS	2915- total PWS 601- C 639- NTNC 1675- TNC
2. Total Number of Maximum Contaminant Level (MCL) Violations	938
3. Number of PWS with MCL Violations	458- total PWS 87- C 123- NTNC 248- TNC
4. Percentage of PWS types of MCL Violations	87- C (14%) 123- NTNC (19%) 248- TNC (15%)
5. Total Number of Monitoring and Reporting (M & R) Violations	15280
6. Number of PWS with M & R Violations	1079- total PWS 213- C 626- NTNC 240- TNC
7. Percentage of PWS with M & R Violations	1079- total PWS 213- C (33%) 626- NTNC (98%) 240- TNC (14%)
8. Sanitary surveys (frequency) enumeration of deficiencies	95- CWS 151- NTNC
9. Track significant non-compliers (SNC)	5- CWS 20- NTNC
10. Number of Certified Operators	1144
11. Tracking technical assistance provided by other sources (contractors, local governments, etc.)	0 (no contracts executed)

12. Number of new CWSs being created	CWS- 3 new created NTNC- 4 existing discovered
13. Number of new NTNC's being created	CWS- 3 new created NTNC- 16 existing discovered

The number and significance of benchmarks may change as programmatic requirements change. However, for a State program to effectively run a “capacity development” process, a high level of staff training and good internal communications are critically important. Routine and frequent evaluation of the program is also necessary and program adjustments must be made, as necessary.

Through the performance of sanitary surveys, compliance with water system construction and protection, operator certification, cross connection control, monitoring and reporting, water quality and operational regulations, system deficiencies are identified and evaluated. The most common occurrences of noncompliance or deficiencies are with the water system construction and protection regulations. Well construction regulations refer to the physical structure of the well in requiring a watertight seal with all appurtenances in order to protect the well from storm water drainage and runoff. Well protection regulations refer to location of the well in reference to sources of pollution. Water storage facility regulations refer to the construction, location and structural integrity of the facility protecting it from sources of pollution. Other common deficiencies include cross connection violations, on-site water treatment residual disposal violations (DEP) and operational violations.

Sanitary survey results are showing the DWS there is a need for capacity development assistance particularly at small Community PWS. Engineers have been citing violations for Regulations of Connecticut State Agencies (RCSA) 19-13-B102(o) and RCSA 19-13-B102(p) on a regular basis at many Community PWS. These two violations focus on supply capacity of Community PWS and the ability of available sources, storage, treatment, pumping, and transmission facilities to maintain flows in excess of maximum demands experienced. The regular citation of these violations has revealed the need for additional capacity development for these small Community PWS.

**II) Changes to Strategy**

There were no changes to the Capacity Development Strategy for public water systems. It is recommended that it be maintained as approved. Any modifications to the Strategy, as indicated in this report, are for the most part, changes in emphasis, or prioritization of certain components: not redirections or elimination of elements.

**III) Conclusion**

Effective, continued implementation of the Capacity Development Strategy is dependent upon the continuation of the current Federal directive to develop system capacities, and upon EPA’s ability to maintain adequate Federal funding support for the states. The Drinking Water Section of the Department of Public Health will continue to partner with Region 1 EPA, and participate through its affiliation with the Association of State Drinking Water Administrators, to support continuation of critical Capacity Development Strategy initiatives.

## Attachment #1

PWSID	SYSTEM NAME	CITY	LAST SURVEY DATE	SYSTEM TYPE	VIOLATION TYPE	VIOLATION NAME	MP BEGIN	MP END
CT0999053	1011 MIDDLETOWN AVENUE PROPERTIES, LLC	NORTH BRANFORD	7/15/2004	NTNC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1085013	144 OXFORD ROAD, LLC	OXFORD	7/25/2003	NTNC	26	MONITORING (TCR), REPEAT MINOR	7/1/2004	9/30/2004
CT0850064	179 MAIN STREET(PANINOS & OUTFRONT FARM)	MONROE	7/1/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1170264	3 SIDE CUT RD	REDDING	5/17/2005	NC	21	MCL (TCR), ACUTE	12/1/2004	12/31/2004
CT1170264	3 SIDE CUT RD	REDDING	5/17/2005	NC	21	MCL (TCR), ACUTE	1/1/2005	1/31/2005
CT1170264	3 SIDE CUT RD	REDDING	5/17/2005	NC	21	MCL (TCR), ACUTE	2/1/2005	2/28/2005
CT1170264	3 SIDE CUT RD	REDDING	5/17/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1170264	3 SIDE CUT RD	REDDING	5/17/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	2/1/2005	2/28/2005
CT1429173	70 MERROW ROAD (TOLLAND SUBWAY PLAZA)	TOLLAND	3/8/2000	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0181174	782 FEDERAL ROAD	BROOKFIELD	6/8/2004	NC	21	MCL (TCR), ACUTE	7/1/2004	7/31/2004
CT0181174	782 FEDERAL ROAD	BROOKFIELD	6/8/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0740194	920 BANTAM ROAD (JACKIES RESTAURANT)	LITCHFIELD	7/14/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0740194	920 BANTAM ROAD (JACKIES RESTAURANT)	LITCHFIELD	7/14/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1660014	ALL SAINTS EPISCOPAL CHURCH	WOLCOTT	3/11/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	4/30/2005
CT1120041	ALTA TERRACE ASSOCIATION	POMFRET	10/5/2004	C	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1270194	AMC - CT TEN MILE RIVER CAMPSITE	SHERMAN		NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1270194	AMC - CT TEN MILE RIVER CAMPSITE	SHERMAN		NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0420024	AMERICAN DISTILLING & MANUFACTURING, INC	EAST HAMPTON	4/16/2004	NTNC	26	MONITORING (TCR), REPEAT MINOR	1/1/2005	3/31/2005
CT0790014	AMERICAN LEGION POST 197	MARLBOROUGH	1/1/1980	NC	26	MONITORING (TCR), REPEAT MINOR	9/1/2004	9/30/2004
CT0050194	AMERICAN LEGION S.F./CAMP WHITE	BARKHAMSTED	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0570011	AQUARION WATER CO OF CT-GREENWICH SYSTEM	GREENWICH	9/25/2002	C	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0150011	AQUARION WATER CO OF CT-MAIN SYSTEM	BRIDGEPORT	1/30/2004	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0030074	ASHFORD TOWN HALL AND LIBRARY	ASHFORD	5/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0040034	AVON OLD FARMS INN	AVON	7/27/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	6/30/2005
CT0041011	AVON OLD FARMS SCHOOL	AVON	7/22/2003	C	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0041011	AVON OLD FARMS SCHOOL	AVON	7/22/2003	C	26	MONITORING (TCR), REPEAT MINOR	7/1/2004	7/31/2004
CT0041011	AVON OLD FARMS SCHOOL	AVON	7/22/2003	C	26	MONITORING (TCR), REPEAT MINOR	11/1/2004	11/30/2004
CT1390112	BAKER NURSERIES	SUFFIELD	6/10/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0920174	BAKERVILLE UNITED METHODIST CHURCH	NEW HARTFORD		NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1180013	BARLOW MOUNTAIN & SCOTLAND ELEM SCHOOLS	RIDGEFIELD	8/4/2003	NTNC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0170011	BRISTOL WATER DEPARTMENT	BRISTOL	11/4/2004	C	21	MCL (TCR), ACUTE	9/1/2004	9/30/2004
CT0170011	BRISTOL WATER DEPARTMENT	BRISTOL	11/4/2004	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0170011	BRISTOL WATER DEPARTMENT	BRISTOL	11/4/2004	C	26	MONITORING (TCR), REPEAT MINOR	8/1/2004	8/31/2004
CT0189393	BROOKFIELD (E&A, LLC) - SHOPRITE PLAZA	BROOKFIELD	1/19/2005	NTNC	21	MCL (TCR), ACUTE	1/1/2005	1/31/2005
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	1/1/2005	1/31/2005
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	2/1/2005	2/28/2005
CT0180342	BROOKFIELD OFFICE PARK	BROOKFIELD	12/14/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	3/1/2005	3/31/2005
CT0180664	BROOKFIELD SUNOCO	BROOKFIELD	1/25/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0180664	BROOKFIELD SUNOCO	BROOKFIELD	1/25/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	1/1/2005	1/31/2005
CT0180664	BROOKFIELD SUNOCO	BROOKFIELD	1/25/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	2/1/2005	2/28/2005
CT1080034	BROOKSIDE INN RESTAURANT	OXFORD	6/17/2004	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1080034	BROOKSIDE INN RESTAURANT	OXFORD	6/17/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004



CT0710194	CAMP LAUREL - WELL #4	LEBANON	7/20/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0870062	CAMP WASHINGTON, INC.	MORRIS	6/19/2002	NC	21	MCL (TCR), ACUTE	10/1/2004	12/31/2004
CT0710011	CAREFREE HOMEOWNERS ASSOCIATION	LEBANON	10/12/2004	C	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT0779071	CARLSON SPRING	MANCHESTER	10/15/2003	C	26	MONITORING (TCR), REPEAT MINOR	8/1/2004	8/31/2004
CT0020024	CASTLE BEVERAGE	ANSONIA	9/14/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0180904	CHARTER INDUSTRIAL CONDO	BROOKFIELD	1/1/1980	NP	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0180904	CHARTER INDUSTRIAL CONDO	BROOKFIELD	1/1/1980	NP	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0180904	CHARTER INDUSTRIAL CONDO	BROOKFIELD	1/1/1980	NP	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0700274	CHATFIELD HOLLOW S.P./PAVILION WELL	KILLINGWORTH	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0660353	CHILDHOOD MEMORIES	HARWINTON	9/20/2000	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0660353	CHILDHOOD MEMORIES	HARWINTON	9/20/2000	NTNC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0340264	CHILDRENS CENTER OF DANBURY	DANBURY	1/12/2001	NTNC	21	MCL (TCR), ACUTE	7/1/2004	7/31/2004
CT0340264	CHILDRENS CENTER OF DANBURY	DANBURY	1/12/2001	NTNC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT1610202	CHILDRENS DAY SCHOOL OF WILTON	WILTON	8/17/2004	NTNC	21	MCL (TCR), ACUTE	6/1/2005	6/30/2005
CT1200014	CHRIST EPISCOPAL CHURCH	ROXBURY	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT1200014	CHRIST EPISCOPAL CHURCH	ROXBURY	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT1050064	CHRIST THE KING RECTORY	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1050064	CHRIST THE KING RECTORY	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT1050064	CHRIST THE KING RECTORY	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT1050064	CHRIST THE KING RECTORY	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	1/1/2005	1/31/2005
CT1050064	CHRIST THE KING RECTORY	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	6/1/2005	6/30/2005
CT0915213	CHRISTIAN DAY NURSERY SCHOOL	NEW FAIRFIELD	1/21/1999	NTNC	26	MONITORING (TCR), REPEAT MINOR	1/1/2005	1/31/2005
CT1470184	CIRCLE "C" CAMPGROUND - WELL #2	VOLUNTOWN	9/23/2004	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1170094	CLEMENS RESTAURANT	REDDING	8/8/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	6/30/2005
CT0460044	CONNECTICUT GOLF CLUB	EASTON	7/21/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0610422	CONNECTICUT YANKEE ATOMIC POWER CO.	HADDAM	4/21/1994	NTNC	26	MONITORING (TCR), REPEAT MINOR	10/1/2004	10/31/2004
CT0610422	CONNECTICUT YANKEE ATOMIC POWER CO.	HADDAM	4/21/1994	NTNC	26	MONITORING (TCR), REPEAT MINOR	11/1/2004	11/30/2004
CT1660044	COTES CAFÉ	WOLCOTT	10/30/2002	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0850104	CRESCENT VILLAGE	MONROE	9/24/2004	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT0690011	CRYSTAL WATER COMPANY	KILLINGLY	1/6/2004	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT1080394	CUCINA RUSTICA RISTORANTE, INC.	OXFORD		NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0030164	CUMBERLAND FARMS	ASHFORD	8/16/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0410604	DEVILS HOPYARD S.P./PICNIC AREA	EAST HADDAM	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1500124	DOCS TRATTORIA & PIZZERIA	WASHINGTON	8/5/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0660084	DR. DAVID L. FRENCH	HARWINTON	1/1/1980	NC	26	MONITORING (TCR), REPEAT MINOR	4/1/2005	6/30/2005
CT0380372	DURHAM MANUFACTURING	DURHAM	9/21/2004	NTNC	21	MCL (TCR), ACUTE	8/1/2004	8/31/2004
CT0380372	DURHAM MANUFACTURING	DURHAM	9/21/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0380372	DURHAM MANUFACTURING	DURHAM	9/21/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0380372	DURHAM MANUFACTURING	DURHAM	9/21/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0380372	DURHAM MANUFACTURING	DURHAM	9/21/2004	NTNC	26	MONITORING (TCR), REPEAT MINOR	8/1/2004	8/31/2004
CT0570074	E.T. SETON BOY SCOUT CAMP - MAIN BLDG	GREENWICH	8/14/2003	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0420902	EAST HAMPTON HIGH SCHOOL	EAST HAMPTON	11/19/2002	NTNC	21	MCL (TCR), ACUTE	7/1/2004	7/31/2004
CT0870054	EAST MORRIS XTRA MART/CITGO GAS STATION	MORRIS	12/13/2002	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0470071	EAST WINDSOR HOUSING AUTHORITY	EAST WINDSOR	1/9/2004	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0990084	EDWARD SMITH LIBRARY	NORTH BRANFORD	6/6/2001	NC	26	MONITORING (TCR), REPEAT MINOR	7/1/2004	9/30/2004
CT0480031	ELLINGTON ACRES COMPANY	ELLINGTON	10/8/2004	C	21	MCL (TCR), ACUTE	10/1/2004	10/31/2004

CT0480114	ELLINGTON RIDGE COUNTRY CLUB	ELLINGTON	5/17/2000	NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0037001	EVANGELICAL BAPTIST CENTER - MAIN	ASHFORD	8/11/2005	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT1660094	FARMINGBURY GOLF COURSE	WOLCOTT	5/14/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0780104	FIRST CHURCH OF CHRIST IN MANSFIELD	MANSFIELD	5/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0780104	FIRST CHURCH OF CHRIST IN MANSFIELD	MANSFIELD	5/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0780104	FIRST CHURCH OF CHRIST IN MANSFIELD	MANSFIELD	5/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	6/1/2005	6/30/2005
CT0670384	GAY CITY S.P./BALLFIELD WELL	HEBRON	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0670384	GAY CITY S.P./BALLFIELD WELL	HEBRON	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0670374	GAY CITY S.P./YOUTH CAMP WELL	HEBRON	9/8/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0190284	GOLDEN LAMB RESTAURANT	BROOKLYN	12/6/2004	NC	21	MCL (TCR), ACUTE	10/1/2004	12/31/2004
CT0630024	GOODWIN CONSERVATION CENTER	HAMPTON	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0630024	GOODWIN CONSERVATION CENTER	HAMPTON	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0400041	GQC WELL COMMISSION	EAST GRANBY	7/19/2005	C	26	MONITORING (TCR), REPEAT MINOR	5/1/2005	5/31/2005
CT0570363	GREENWICH REFORM SYNAGOGUE	GREENWICH	10/15/2004	NTNC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT0570363	GREENWICH REFORM SYNAGOGUE	GREENWICH	10/15/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0570244	GREENWICH SKATING CLUB	GREENWICH		NC	26	MONITORING (TCR), REPEAT MINOR	10/1/2004	12/31/2004
CT0820074	GUIDAS DRIVE-IN RESTAURANT	MIDDLEFIELD	10/22/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0610563	HADDAM-KILLINGWORTH MIDDLE/HIGH SCHOOL	HADDAM	3/20/2003	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT1050144	HAINS PARK	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT1050144	HAINS PARK	OLD LYME	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1690094	HARRISVILLE GOLF COURSE	WOODSTOCK	7/20/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0915103	HERITAGE PLAZA	NEW FAIRFIELD	10/6/2004	NTNC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1020164	HIGHLAND ORCHARD RESORT PARK	NORTH STONINGTON	9/30/2003	NC	21	MCL (TCR), ACUTE	10/1/2004	12/31/2004
CT0720104	HOLDRIDGE FARM NURSERY-BAKE SHOPPE	LEDYARD	10/2/2000	NTNC	26	MONITORING (TCR), REPEAT MINOR	8/1/2004	8/31/2004
CT0459103	INNCOM INTERNATIONAL	EAST LYME	3/8/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT1660134	J & M PIZZA	WOLCOTT	3/5/2002	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0700011	JENSENS, INC. BEECHWOOD RESIDENTIAL	KILLINGWORTH	9/25/2003	C	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	4/30/2005
CT1170332	JOEL BARLOW REGIONAL HIGH SCHOOL	REDDING	8/30/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0110051	JUNIPER CLUB INC.	BLOOMFIELD	7/26/2005	C	26	MONITORING (TCR), REPEAT MINOR	9/1/2004	9/30/2004
CT0680021	KENT SCHOOL CORP (VALLEY CAMPUS)	KENT	8/9/2005	C	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT0700204	KILLINGWORTH TOWN HALL	KILLINGWORTH	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1540074	KINGDOM HALL OF JEHOVAHS WITNESS	WESTBROOK	8/26/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT1660194	LAFORTUNA RESTAURANT	WOLCOTT	4/15/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0680134	LAKE WARRAMAUG/DAY USE WELL	KENT	9/9/2005	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT0680134	LAKE WARRAMAUG/DAY USE WELL	KENT	9/9/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0680144	LAKE WARRAMAUG/SHOP WELL	KENT	4/20/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0680144	LAKE WARRAMAUG/SHOP WELL	KENT	4/20/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT0180464	LAUREL HILL COMPLEX	BROOKFIELD	4/29/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0180464	LAUREL HILL COMPLEX	BROOKFIELD	4/29/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT1000094	LONE OAK CAMPGROUND	NORTH CANAAN	7/1/2005	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1120084	MASHAMOQUET BROOK S.P./CAMP WELL	POMFRET	6/15/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0600322	MELISSA JONES SCHOOL - WELL #1	GUILFORD	11/15/2002	NTNC	26	MONITORING (TCR), REPEAT MINOR	4/1/2005	6/30/2005
CT0720134	MING MOON	LEDYARD	12/14/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	1/1/2005	1/31/2005
CT1300034	MIRANDAS PIZZA & RESTAURANT	SOUTHBURY	7/7/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	6/30/2005
CT1470054	NATURES CAMPSITES	VOLUNTOWN	9/23/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1470054	NATURES CAMPSITES	VOLUNTOWN	9/23/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004

CT0590031	NOANK FIRE DISTRICT	GROTON	9/13/2001	C	26	MONITORING (TCR), REPEAT MINOR	2/1/2005	2/28/2005
CT1378063	OPEN DOOR BAPTIST CHURCH	STONINGTON	10/25/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT1080164	OXFORD HOUSE RESTAURANT	OXFORD	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1470114	PACHAUG S.F./H.P. #1 GREEN FALLS	VOLUNTOWN	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1099083	PLAINFIELD REST AREA (I-395 N&S)	PLAINFIELD	1/1/1980	NC	26	MONITORING (TCR), REPEAT MINOR	4/1/2005	6/30/2005
CT1460264	PLANET FITNESS	VERNON	9/2/2003	NC	25	MONITORING (TCR), REPEAT MAJOR	5/1/2005	5/31/2005
CT0540182	PREFERRED FIXTURE MANUFACTURING CO.	GLASTONBURY	11/19/2004	NP	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1160011	PUTNAM WATER POLLUTION CONTROL AUTHORITY	PUTNAM	6/21/2005	C	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	4/30/2005
CT0600371	QUONNIPaug HILLS - UPPER SYSTEM	GUILFORD	5/26/2005	C	26	MONITORING (TCR), REPEAT MINOR	7/1/2004	9/30/2004
CT1170374	REDDING COMMUNITY CENTER	REDDING	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT1050492	REGION 18 SCHOOLS - LYME STREET	OLD LYME	1/19/2000	NTNC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	4/30/2005
CT0979113	ROCKY GLEN MILL	NEWTOWN	10/15/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0969263	ROCKY RIVER BUSINESS & PROFESSIONAL CTR	NEW MILFORD	6/2/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0580064	ROOSTERS CITGO	GRISWOLD	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1140134	ROSIES AROUND THE CLOCK GRILL	PRESTON	7/30/2004	NC	21	MCL (TCR), ACUTE	7/1/2004	9/30/2004
CT1501111	RUMSEY HALL SCHOOL	WASHINGTON	6/9/2005	C	26	MONITORING (TCR), REPEAT MINOR	4/1/2005	4/30/2005
CT1501141	RUMSEY HALL SCHOOL - FACULTY HOUSES	WASHINGTON	11/8/2001	NP	26	MONITORING (TCR), REPEAT MINOR	11/1/2004	11/30/2004
CT1501131	RUMSEY HALL SCHOOL - HILLTOP	WASHINGTON	11/8/2001	NP	26	MONITORING (TCR), REPEAT MINOR	11/1/2004	11/30/2004
CT0070204	SAFARI GOLF	BERLIN	6/23/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	6/30/2005
CT0990703	SAINT ANDREWS CHURCH	NORTH BRANFORD	9/2/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1219053	SALEM COUNTRY GARDENS	SALEM	6/1/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1600011	SOUTH WILLINGTON WATER COMPANY LLC	WILLINGTON	2/28/2005	C	21	MCL (TCR), ACUTE	12/1/2004	12/31/2004
CT1510094	SPRING GROVE REC AREA	WATERBURY	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0970444	ST. JOHNS EPISCOPAL CHURCH	NEWTOWN	7/16/2001	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0990514	ST. MONICAS ROMAN CATHOLIC CHURCH	NORTH BRANFORD	6/3/2001	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0990514	ST. MONICAS ROMAN CATHOLIC CHURCH	NORTH BRANFORD	6/3/2001	NC	26	MONITORING (TCR), REPEAT MINOR	7/1/2004	9/30/2004
CT0570174	STANWICH CONGREGATIONAL CHURCH	GREENWICH		NC	21	MCL (TCR), ACUTE	10/1/2004	12/31/2004
CT0570174	STANWICH CONGREGATIONAL CHURCH	GREENWICH		NC	26	MONITORING (TCR), REPEAT MINOR	1/1/2005	3/31/2005
CT1020404	STONINGTON INSTITUTE - MAIN HOUSE	NORTH STONINGTON	8/11/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT1020404	STONINGTON INSTITUTE - MAIN HOUSE	NORTH STONINGTON	8/11/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	3/1/2005	3/31/2005
CT0720074	SUBWAY	LEDYARD	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0720074	SUBWAY	LEDYARD	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0850194	SUBWAY OF MONROE	MONROE	6/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0850194	SUBWAY OF MONROE	MONROE	6/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0850194	SUBWAY OF MONROE	MONROE	6/21/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0570184	TAMARACK COUNTRY CLUB	GREENWICH	2/24/2005	NTNC	26	MONITORING (TCR), REPEAT MINOR	10/1/2004	12/31/2004
CT1280011	TARIFFVILLE FIRE DISTRICT WATER DEPT	SIMSBURY	6/16/2005	C	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1500174	THE BIRCHES	WASHINGTON	8/5/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0740424	THE MAIN COURSE RESTAURANT	LITCHFIELD	2/25/2005	NC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT0970334	THE VILLA RESTAURANT AND PIZZA	NEWTOWN	2/1/2005	NC	21	MCL (TCR), ACUTE	12/1/2004	12/31/2004
CT0999043	TILCON CONNECTICUT INC. - NORTH BRANFORD	NORTH BRANFORD	1/25/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	12/31/2004
CT0999043	TILCON CONNECTICUT INC. - NORTH BRANFORD	NORTH BRANFORD	1/25/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0999043	TILCON CONNECTICUT INC. - NORTH BRANFORD	NORTH BRANFORD	1/25/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	12/1/2004	12/31/2004
CT0999043	TILCON CONNECTICUT INC. - NORTH BRANFORD	NORTH BRANFORD	1/25/2005	NTNC	25	MONITORING (TCR), REPEAT MAJOR	1/1/2005	1/31/2005
CT1330054	TJS CAFE	SPRAGUE	10/19/2004	NC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT1430814	TORRINGTON PIZZA PALACE	TORRINGTON	1/1/1980	NP	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004

CT0381011	TWIN MAPLES NURSING HOME	DURHAM	5/8/2002	C	25	MONITORING (TCR), REPEAT MAJOR	2/1/2005	2/28/2005
CT1470044	TWO BROTHERS PUB	VOLUNTOWN	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	4/1/2005	6/30/2005
CT0189063	UPS	BROOKFIELD	10/26/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	7/31/2004
CT0189063	UPS	BROOKFIELD	10/26/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	8/1/2004	8/31/2004
CT0189063	UPS	BROOKFIELD	10/26/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	11/1/2004	11/30/2004
CT0189063	UPS	BROOKFIELD	10/26/2004	NTNC	26	MONITORING (TCR), REPEAT MINOR	10/1/2004	12/31/2004
CT0189063	UPS	BROOKFIELD	10/26/2004	NTNC	26	MONITORING (TCR), REPEAT MINOR	5/1/2005	5/31/2005
CT0867031	VILLAGE APARTMENTS	MONTVILLE	8/7/2003	C	25	MONITORING (TCR), REPEAT MAJOR	10/1/2004	10/31/2004
CT1600041	WALDEN APARTMENTS	WILLINGTON	5/31/2005	C	26	MONITORING (TCR), REPEAT MINOR	10/1/2004	12/31/2004
CT1500343	WASHINGTON MONTESSORI SCHOOL	WASHINGTON	8/21/2003	NTNC	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004
CT0810274	WESSON SHELL #4	MIDDLEBURY	1/1/1980	NC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1341313	WILLINGTON NAMEPLATE, INC.	STAFFORD	9/28/2004	NTNC	25	MONITORING (TCR), REPEAT MAJOR	9/1/2004	9/30/2004
CT1606111	WILLINGTON RIDGE CONDOS - SYSTEM #1	WILLINGTON	3/20/2002	C	25	MONITORING (TCR), REPEAT MAJOR	7/1/2004	9/30/2004

**Attachment #2**

**New System Report  
Since 2002**

<b>PWSID</b>	<b>PUBLIC WATER SYSTEM</b>	<b>ASSOCIATION</b>	<b>CLASS.</b>	<b>TOWN</b>	<b>DATE FIRST IDENTIFIED</b>	<b>SNC LIST?</b>
CT0010111	WHISPERING HILLS, LLC - WELL D SYSTEM	Multiple System	C	ANDOVER	1/14/2004	
CT0039021	EVANGELICAL BAPTIST CENTER - RESIDENTIAL	Multiple System	C	ASHFORD	1/22/2004	
CT0039023	EVANGELICAL BAPTIST CENTER - REC CENTER	Multiple System	NTNC	ASHFORD	1/22/2004	
CT0055071	FOXRIDGE APARTMENTS-WELL 2	Multiple System	C	BARKHAMSTED	1/23/2004	
CT0105043	WOODHALL SCHOOL-WELL 2	Multiple System	NTNC	BETHLEHEM	1/22/2004	<b>YES</b>
CT0119231	KENMORE ROAD ASSN.-LOWER SYSTEM	Multiple System	C	BLOOMFIELD	1/23/2004	
CT0189833	RODINO, LLP - THE GODDARD SCHOOL	NEW SYSTEM	NTNC	BROOKFIELD	11/25/2002	
CT0189843	1087 FEDERAL ROAD	NEW SYSTEM	NTNC	BROOKFIELD	7/27/2004	
CT0189853	1112 FEDERAL ROAD	Existing System	NTNC	BROOKFIELD	10/12/2004	
CT0189863	1114 FEDERAL ROAD	Existing System	NTNC	BROOKFIELD	10/12/2004	
CT0209311	BURLINGTON SENIOR HOUSING	NEW SYSTEM	C	BURLINGTON	1/2/2003	
CT0210023	FALLS VILLAGE DAYCARE (TOWN OF CANAAN)	Existing System	NTNC	CANAAN	4/17/2003	
CT0229031	CAMPBELL HEIGHTS APARTMENTS - SYSTEM #2	Multiple System	C	CANTERBURY	1/15/2004	
CT0229041	CAMPBELL HEIGHTS APARTMENTS - SYSTEM #3	Multiple System	C	CANTERBURY	1/15/2004	
CT0235071	GREENWAY APARTMENTS-BUILDING 302	Multiple System	C	CANTON	1/22/2004	
CT0320181	COVENTRY HOUSING AUTHORITY-UPPER SYSTEM	Multiple System	C	COVENTRY	1/15/2004	
CT0331123	PUMPKIN PATCH CHILDCARE& LEARNING CENTER	Existing System	NTNC	CROMWELL	4/1/2005	
CT0340013	UNITED METHODIST CHURCH OF DANBURY	Existing System	NTNC	DANBURY	4/21/2003	
CT0347051	AQUA VISTA ASSOC, INC - LOWER SYSTEM	Multiple System	C	DANBURY	1/12/2004	
CT0363031	RIDGEWOOD HILLS ASSOCIATION, SYSTEM #2	Multiple System	C	DEEP RIVER	1/14/2004	
CT0363041	RIDGEWOOD HILLS ASSOCIATION, SYSTEM #3	Multiple System	C	DEEP RIVER	1/14/2004	
CT0363051	RIDGEWOOD HILLS ASSOCIATION, SYSTEM #4	Multiple System	C	DEEP RIVER	1/14/2004	
CT0363063	THE CLUBHOUSE OF CT RIVER VALLEY	Existing System	NTNC	DEEP RIVER	9/29/2004	
CT0389143	HOBSON MOTZER, INC.	Existing System	NTNC	DURHAM	9/9/2004	
CT0408021	METACOMET HOMES-WELL 2	Multiple System	C	EAST GRANBY	1/22/2004	
CT0419183	NATHAN HALE-RAY MIDDLE SCHOOL-RAY WING	Existing System	NTNC	EAST HADDAM	12/24/2003	
CT0429113	MASONIC TEMPLE ASSN OF EAST HAMPTON	Existing System	NTNC	EAST HAMPTON	7/17/2002	
CT0429123	240 MIDDLETOWN AVE LLC	Existing System	NTNC	EAST HAMPTON	5/5/2005	
CT0609053	NORTH GUILFORD CONGREGATIONAL CHURCH	Existing System	NTNC	GUILFORD	7/18/2002	
CT0609073	MELISSA JONES SCHOOL - WELL #2	Multiple System	NTNC	GUILFORD	12/24/2003	
CT0672043	HEBRON CENTER NURSERY SCHOOL	Existing System	NTNC	HEBRON	9/10/2004	
CT0719111	LEBANON PINES, SYSTEM #2	Multiple System	C	LEBANON	1/14/2004	
CT0760041	GROVE SCHOOL - SYSTEM #2	Multiple System	C	MADISON	3/24/2004	
CT0769193	THE LEARNING VILLAGE, INC.	NEW SYSTEM	NTNC	MADISON	11/25/2002	
CT0769203	1,2,3 GROW WITH ME	Existing System	NTNC	MADISON	4/4/2003	
CT0787023	COMMUNITY CHILDRENS CENTER	NEW SYSTEM	NTNC	MANSFIELD	4/30/2004	
CT0798023	JONES HOLLOW MEDICAL COMPLEX	NEW SYSTEM	NTNC	MARLBOROUGH	7/22/2003	
CT0859043	STEVENSON LUMBER - GARAGE & LOCKER ROOM	Existing System	NTNC	MONROE	1/9/2004	
CT0859053	THE WATERVIEW	NEW SYSTEM	NTNC	MONROE	7/21/2004	
CT0869083	WATERVIEW BUSINESS PARK	NEW SYSTEM	NTNC	MONTVILLE	11/25/2002	
CT0869093	CREATIVE CARE DAYCARE, LLC	NEW SYSTEM	NTNC	MONTVILLE	8/8/2003	
CT0979343	LITTLE EXPLORERS DAY CARE	Existing System	NTNC	NEWTOWN	5/5/2005	
CT1030183	UNITED CONGREGATIONAL CHURCH	Existing System	NTNC	NORWALK	3/17/2005	
CT1059193	EASTPORT - WEST 2	Existing System	NTNC	OLD LYME	11/20/2002	
CT1099131	MOOSUP MANOR	Existing System	C	PLAINFIELD	8/13/2002	
CT1149033	PRESTON VETERANS MEMORIAL SCHOOL	NEW SYSTEM	NTNC	PRESTON	1/9/2003	

CT1160013	PUTNAM SCHOOL OF EARLY LEARNING	Existing System	NTNC	PUTNAM	9/13/2002	
CT1169023	PUTNAM CHRYSLER DODGE JEEP	Existing System	NTNC	PUTNAM	9/30/2004	
CT1169033	554 LIBERTY HIGHWAY	Existing System	NTNC	PUTNAM	12/2/2004	
CT1180013	BARLOW MOUNTAIN & SCOTLAND ELEM SCHOOLS	NEW SYSTEM	NTNC	RIDGEFIELD	7/11/2003	
CT1189201	RURAL WATER CO, INC-SCODON - WELL #4	Multiple System	C	RIDGEFIELD	1/12/2004	
CT1189301	RURAL WATER CO, INC-SOUNDVIEW- INTERCONN	Multiple System	C	RIDGEFIELD	1/15/2004	
CT1189401	WARREN ARTHUR PROPERTIES - WELLS 2 & 3	Existing System	C	RIDGEFIELD	11/29/2004	
CT1189501	WARREN ARTHUR PROPERTIES - WELL 1	Existing System	C	RIDGEFIELD	11/29/2004	
CT1200013	162 BAKER ROAD	Existing System	NTNC	ROXBURY	4/17/2003	
CT1219111	SALEM MANOR CONDOMINIUMS, SYSTEM #2	Multiple System	C	SALEM	12/2/2003	
CT1270013	LITTLE MUNCHKIN DAY CARE	Existing System	NTNC	SHERMAN	7/2/2003	YES
CT1299021	TOWN OF SOMERS - SOMERSVILLE SYSTEM	Multiple System	C	SOMERS	1/22/2004	
CT1299031	TOWN OF SOMERS - RYE HILL SYSTEM	Multiple System	C	SOMERS	1/22/2004	
CT1301113	FIRST STEPS DAY CARE & LEARNING CENTER	Existing System	NTNC	SOUTHBURY	2/10/2003	YES
CT1320243	LEARNING CENTER, LLC.	Existing System	NTNC	SOUTH WINDSOR	10/22/2002	
CT1320263	OAKLAND PRESCHOOL CENTER, INC.	Existing System	NTNC	SOUTH WINDSOR	6/18/2003	
CT1341313	WILLINGTON NAMEPLATE, INC.	Existing System	NTNC	STAFFORD	8/4/2003	
CT1378063	OPEN DOOR BAPTIST CHURCH	Existing System	NTNC	STONINGTON	8/27/2004	
CT1419053	MARIANAPOLIS PREP SCHOOL - ADMIN/SCHOOL	Multiple System	NTNC	THOMPSON	1/20/2004	
CT1429171	VILLAGE AT CRYSTAL SPRINGS	NEW SYSTEM	C	TOLLAND	9/27/2004	
CT1429191	TOLLAND WATER DEPT - TORRY ROAD	Multiple System	C	TOLLAND	3/24/2003	
CT1489043	1105 NORTHRUP ROAD	Existing System	NTNC	WALLINGFORD	10/22/2002	
CT1489053	BUILDING BLOCKS LEARNING CENTER	Existing System	NTNC	WALLINGFORD	7/3/2003	
CT1501013	DEVEREUX GLENHOLME SCHOOL - MAIN CAMPUS	Multiple System	NTNC	WASHINGTON	1/5/2004	
CT1501111	RUMSEY HALL SCHOOL	Multiple System	C	WASHINGTON	1/15/2004	
CT1606211	WILLINGTON RIDGE CONDOS - SYSTEM #2	Multiple System	C	WILLINGTON	1/13/2004	
CT1620233	SBC - WINCHESTER	Existing System	NTNC	WINCHESTER	4/16/2003	
CT1660013	WOLCOTT PUBLIC WORKS	Existing System	NTNC	WOLCOTT	11/28/2003	YES
CT1660584	464 WOLCOTT ROAD(FPC PROPERTY)	Existing System	NTNC	WOLCOTT	7/31/2003	
CT1669071	RSK REALTY 3	Multiple System	C	WOLCOTT	12/30/2003	
CT1670173	125-131 BRADLEY ROAD	Existing System	NTNC	WOODBURGE	10/8/2004	
CT1686091	TOWN IN COUNTRY CONDOMINIUMS - LOWER SYS	Multiple System	C	WOODBURY	1/7/2004	
CT1686093	EARLY LEARNING CENTER OF WOODBURY	Existing System	NTNC	WOODBURY	4/1/2003	
CT1691111	BROOKWOOD APARTMENTS - SYSTEM #2	Multiple System	C	WOODSTOCK	1/14/2004	
CT1691171	HYDE SCHOOL - SYSTEM #2 (RESIDENTIAL)	Multiple System	C	WOODSTOCK	1/14/2004	

- = Multiple systems (32) -> were part of an existing system, but split off due to a multiple system
- = Existing systems (37) -> PWS we were not aware of previously
- = New systems (12)