State of Connecticut
Department of Public Health
Drinking Water Section

Annual Capacity Development Report
for the period
July 1, 2007 – June 30, 2008

September 2008

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 will be maintained. However, a modification of the DWS Capacity Development Strategy (August, 2000) must be prepared to include a change in emphasis, redirection and elimination of some elements. Updated documents, procedures and program areas will need emphasis in the modified Strategy as the DWS moves forward. It is anticipated that the updated DWS Capacity Development Strategy will be completed by December 31, 2008.

The FY2008 annual on-going implementation report is formatted consistent with the Reporting Criteria for Annual State Capacity Development Program Implementation Reports provided by the EPA's Office of Ground Water and Drinking Water. The following sections are arranged to reflect this reporting criteria.

A. New Systems Program Annual Reporting Criteria

1. ***Has the State's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year? If, so, please explain and identify how this has affected or impacted the implementation of the New Systems Program. Additional documentation, including an Attorney General (AG) statement or a statement from a delegated department attorney, may be required. If not, no additional information on legal authority is necessary.***

   Answer: Changes to the Connecticut General Statutes (CGS) Section 16-262m became effective October 1, 2007. These changes separated the statute into sections to specifically address new residential water companies (i.e. Community Water Systems) and new non-residential water companies (i.e. Non-Transient and Transient Public Water Systems). The changes distinguish between the Department of Public Health (DPH) and the Department of Public Utility Control's (DPUC) authorities for each of these two classifications of water systems.

   The changes require the DPH to develop regulations to specifically evaluate the technical, managerial, and financial (TFM) capacity of new non-community public water systems (PWSs). The existing regulations are written specifically for community water systems (CWS). The Certificate of Public Convenience and Necessity (CPCN) process for non-community systems has also been streamlined by removing the DPUC from the review process which had been an unnecessary administrative element.

   It is believed that these changes will further promote system consolidation as well as improve the State's New Systems Program for non-community systems. The DPH does not believe these changes will affect the State's authority to implement the New Systems Program. However, these changes have been shared with the Office of the Attorney General for a formal opinion. As of the date of this report the DPH has not received this opinion but will share it with EPA Region 1 as soon as it is received.

2. ***Have there been any modifications to the States' control points? If so, describe the modifications and any impacts these modifications have had on the implementation of the New Systems program. If not, no additional information on control points is necessary.***

   Answer: There have been no modifications to the State's control points.

3. ***List new systems (PWSID & Name) in the State within the past three years, and indicate whether those systems have been on any of the annual* Significant Non-Compliers *(SNC) lists (as generated annually by EPA's Office of Enforcement and Compliance Assurance).***

Answer: Attachment 1 provides the list of new systems created through the CPCN regulatory process during the period of July 1, 2005 and June 30, 2008. Attachment 2 provides a list of newly discovered existing water systems that were identified by the DWS during that same time frame. Attachment 2 includes new water systems that were created by existing regulated public water systems that were technically (engineering) approved by this office but did not need financial or managerial capacity evaluations. These attachments also indicate if the PWSs appeared on a SNC list.

Twenty-two (22) new systems were created during the period of July 1, 2005 to June 30, 2008 through the CPCN process. These systems received comprehensive technical, managerial and financial capacity evaluations. Four (4) of these PWSs were identified on one or more of the annual SNC lists during this period. Two (2) of the systems incurred reporting violations for not reporting water quality testing results during the required reporting period; these 2 PWS have returned to compliance. Both of these systems are owned by municipalities, one of which is also an Exclusive Service Area provider. The remaining 2 systems failed to monitor for some of the required water quality testing parameters; these PWSs have since begun monitoring for the missed parameters and therefore have returned to compliance. Both of these systems received an extensive TMF capacity evaluation during the CPCN review process.

Ensuring that all monitoring and reporting functions are completed is considered a management responsibility. All of these PWSs will be evaluated to determine where additional assistance or training is necessary.

One hundred and seven (107) systems are listed on Attachment 2. Most of these were newly discovered existing systems that were identified after the systems had been built and placed into operation. The vast majority were non-community systems that had been in operation for many years. Some of these systems were existing commercial properties that changed ownership and business operations which subsequently resulted in them becoming public water systems by exceeding the population threshold. Three (3) were new systems that were approved at the local level without complying with the CPCN requirements. All systems were provided the necessary regulatory compliance information and sanitary surveys were conducted. Of these 107 systems, 7 were identified on an annual SNC list during the 7/1/05 to 6/30/08 time period. Violations included 5 monitoring and reporting violations, a Nitrate maximum contaminant level (MCL) violation, and a Radium MCL violation. Four (4) of the systems have returned to compliance and appropriate DPH enforcement actions are underway in an effort to bring the remaining 2 systems with MCL violations back into compliance.

Seven (7) of these 107 systems were identified when they submitted water system infrastructure projects (non-CPCN) to the DWS. These projects were subsequently reviewed and approved by the DWS. One new CWS was built by an existing regulated CWS as an independent non-connected satellite system. One new CWS was built as a connected consecutive system to another CWS. The remaining 5 systems were existing businesses with non-public water systems that were upgrading their water supply systems in anticipation of a new tenant and an increase in population that would result in the system meeting the definition of a PWS. One of these 7 systems was identified on an annual SNC list during this same period. The PWS submitted water quality results late and received a reporting violation. This PWS has returned to compliance.

Based on the data presented some conclusions were drawn:

- 139 new systems were added to Connecticut's PWS inventory during the period of 7/1/05 to 6/30/08.
- 11 of the 139 (8%) new systems were identified on a Federal SNC list during the period of 7/1/05 to 6/30/08.
- 9 of the 11 (82%) SNC systems were the result of monitoring and/or reporting violations for drinking water quality testing.
- Although the DWS believes the existing CPCN regulatory review process for new systems adequately addresses a new system's understanding of their water quality monitoring/reporting requirements, it does not guarantee these violations will not occur after the system is operational.
- 100% of the SNC systems were small systems

- 5 of the 9 (56%) new systems that became SNCs as a result of monitoring and/or reporting violations are CWSs or NTNC systems that have a certified operator responsible for the system's water quality monitoring and reporting compliance.
- The DWS is looking at its existing small system operator training curriculum to determine if sufficient emphasis and content is included on water quality monitoring and reporting to help reduce violations.
- 4 of the 9 (44%) new systems that became SNCs as a result of monitoring and/or reporting violations are TNC systems and are not required to have a certified operator. The DWS provides technical assistance to these systems to return them to compliance in addition to providing web-based access to all PWSs' water quality monitoring and reporting compliance schedules.
- Continued education is necessary at the local level to ensure that new development projects proposed by future water companies are identified and referred through the CPCN process so that TMF evaluations are conducted. Two (2) of the 3 systems constructed without CPCN approvals were located in the same town and were built at about the same time. The town officials were contacted and provided information about the CPCN process and review requirements.

B. Existing Systems Strategy

1. ***In referencing the State's approved existing systems strategy, which programs, tools, and/or activities were used, and how did each assist existing PWS's in acquiring and maintaining TMF capacity? Discuss the target audience these activities have been directed towards.***

Answer: Descriptions of the DWS functional units, programs, tools and activities that assistance public water systems with technical, managerial and financial capacity are provided in the following paragraphs.

Compliance Section Activities

The Compliance Section ensures that all PWSs are implementing and complying with all State and Federal mandates. The Compliance Section also ensures that the systems' capacity is maintained in the best feasible condition to afford and assure the safety and protection of public health. This assurance is managed in three integral units.

Monitoring, Reporting & Enforcement (MRE) Unit: The MRE Unit is responsible for several tasks including maintenance of PWS inventory data and water quality monitoring schedules in the SDWIS/STATE database. Violations for failure to comply with health based standards, water quality monitoring, reporting and treatment technique requirements for all federal and state rules are issued by the MRE Unit. The Unit also tracks and cites violations for failure to comply with public notification and consumer confidence reporting requirements. The MRE Unit is responsible for drafting State regulations to match the Federal rules and prepare & educate public water systems on the new rules. The MRE Unit is also responsible for preparing, issuing and tracking formal enforcement actions (Administrative Orders, Consent Orders and Notices of Violation with Civil Penalty), and making referrals to the Office of Attorney for court action. With these responsibilities, this unit tracks and monitors the systems technical ability to maintain and sustain the safety, purity and adequacy of the drinking water, and the systems managerial and or financial capacity to implement a response plan and assure compliance with the reporting and notification requirements.

Implementation & Response Unit: The Implementation & Response Unit (IRU) assigns sanitary engineers to assess the cause or triggers of violations at PWSs and assists these systems in recognizing the corrective technical, financial or managerial measures that need to be undertaken in order to return into compliance with the rules and the regulations. The IRU also assesses the systems' compliance and capacity by conducting sanitary surveys of all PWSs as required by the State regulations and the SDWA. IRU staff provides technical assistance to systems during and after these inspections to help them address and correct violations and deficiencies that were identified. Systems that chronically fail to correct their violations are referred to the MRE Unit for preparation of formal enforcement actions and possibly take-over hearings or court action, while systems in need of financial and or managerial capacity assistance are referred to the

CRS Unit. In addition to these routine surveys, specialized sanitary surveys are conducted when systems incur water quality violations and/or operational failures.

From 7/1/07 through 6/30/08 the DWS conducted 207 sanitary surveys of CWS and 147 sanitary surveys of non-transient non-community (NTNC) systems which provided technical assistance to correct identified deficiencies. During that same time period, sanitary surveys were conducted at all 3 CWS and both of the 2 NTNC systems that incurred E. coli bacteria violations during the 7/1/07 – 6/30/08 time period. Sanitary surveys were conducted at 30 of the 31 CWS and 19 of the 21 NTNC systems that incurred total coliform bacteria violations during the 7/1/07 – 6/30/08 time period.

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 water systems. Of these, thirty-seven (37) have completed these projects and the remaining one (1) will be completed in the near future. Seventy (70) schools were identified as needing major improvements, of which sixty-seven (67) schools have completed those improvements and three (3) schools still need to make major improvements. Thirty-five (35) schools have implemented consolidations. Twenty-nine (29) 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.

The DWS will continue to work with the remaining three schools that still need to make water system improvements to ensure that the water systems meet all applicable statutes and regulations.

Overall, this initiative has tremendously improved the drinking water infrastructure at public schools across Connecticut. An ongoing evaluation of TMF capacity will continue to be conducted during every sanitary survey inspection.

Capacity Review & Standards (CRS) Unit: The CRS Unit performs the following functions within Compliance Section of the DWS:

Engineering Reviews: The CRS Unit's Technical Review Team (TRT) reviews plans and specifications for PWS construction projects, including new systems, and may conduct field inspections during and after project completion. The TRT provides technical assistance to PWSs and develops engineering guidelines, informational materials and application forms to assist PWSs in maintaining or developing sound technical facility infrastructure. Materials developed are used to supplement and/or support existing drinking water regulations and aid PWSs in preparing and submitting plans and specifications that require DWS approval. Non-regulatory guidelines are based on sound engineering practices and/or existing drinking water industry standards.

Financial and Managerial Capacity: The CRS Unit works in cooperation with the Department of Public Utility Control (DPUC) to review the financial and managerial (FM) capacity of new CWS and NTNC systems as part of the CPCN review process. The process restricts the creation of new small water systems by requiring interconnections with existing PWSs whenever feasible. If an applicant cannot interconnect with an existing utility, the CPCN process provides the technical, financial and managerial regulatory requirements for DPUC and DPH approval of the proposed new water system.

Part of the CPCN process 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. This is accomplished through short and long-term planning, assurance of sufficient water supply and infrastructure for the future, and meeting regulatory responsibilities in order to provide safe, adequate and reliable drinking water supply.

Special FM capacity evaluations are conducted by DWS for existing CWSs when:

- there is a change of ownership during the sale of water company owned lands
- the results of a sanitary survey flag a weakness in FM capacity
- enforcement actions are initiated by the DWS and a FM review is deemed appropriate

The CRS Unit promotes asset management concepts including budgeting, inventories, capital improvement plans and rate adjustment for all CWSs. EPA capacity development handbooks, quick reference guides, and other information sheets on these subject matters are provided to systems along with technical assistance to try to provide systems a pathway to long-term sustainability.

Drinking Water State Revolving Fund: The DWS has used the sanitary survey process as a mechanism of promoting interest and use of this low interest loan program as a means to fund water system infrastructure improvements. Staff from the CRS Unit provides assistance to systems to help them understand the requirements of the DWSRF and assist them with submitting their loan applications.

Operator Certification Program Activities

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 includes a DWS training program for operators. It has been long recognized that properly trained and certified water supply professionals improve compliance and reduce enforcement actions. This training curriculum provides small systems operators a broad overview of the compliance requirements and sustainability concepts that small systems need to implement. The OCP offers a quarterly basic small system class for small system operators that covers a broad range of topics including monitoring/reporting, public notification, new drinking water rules/regulations, infrastructure design/maintenance, TMF capacity, backflow prevention, and cross connection control. The OCP also offers small system operators a regulations course on an annual basis and a course for operators of water systems at schools, also on an annual basis. Staff from all DWS units participate as instructors in these trainings.

This OCP also includes cross-connection control. A cross connection is defined as any connection, actual or potential, between a potable (drinking) water source and a non-potable water source, which could cause contamination of the public water supply, by backflow or back-siphonage. The DPH, since 1976, has had an active cross connection program that has primarily required larger (greater than 1,000 consumers) PWSs to conduct cross connection inspections. The premise of a Cross Connection Program is to prevent contamination of drinking water through a cross connection within the distribution system. A PWS that is unable to affect such a program demonstrates a lack of capacity to ensure safe drinking water.

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. DWS activities regarding cross connection control since 2002 has included: outreach via mailings, newsletter articles, participation at seminars, operator training, and response to phone calls to make systems aware of the new cross connection control requirements. The DPH did not conduct any specific cross connection control program inspections during the period of July 1, 2007 through June 30, 2008.

Local Health Departments:

The DWS continues to foster and strengthen its relationship with local health departments on capacity development initiatives with transient non-community (TNC) systems. The majority of TNC systems in the CT inventory are food service establishments that are licensed and inspected locally. State and local drinking water requirements for food establishments overlap in some areas including well construction and water quality. The DWS continues to provide periodic training to local health departments to assist them with inspecting these water supply wells during their licensing inspections and addressing any violations that are identified. The DWS also notifies LHDs when MCL violations or M&R violations occur with all

TNC systems. Often times, joint food inspections/sanitary surveys are done when MCL violations occur at food establishments so local and State enforcement actions can be coordinated and corrective actions implemented. Food establishment compliance with DPH drinking water regulations has improved tremendously since this strategy was implemented in 2000.

Source Water Protection Activities

Watershed Protection: Surface water supplies are obligated to maintain an active watershed inspection program as part of the multi-barrier approach to ensuring safe drinking water. Satisfactory maintenance of a watershed program is also an indicator of the PWS capacity to conduct source protection programs that effectively reduce the potential of contamination to surface water supplies. A system's ability to maintain such a program helps measure satisfactory TMF capacity.

DPH routinely reviews PWS watershed reports to ensure that they focus on resolving water quality issues on their watersheds, thereby providing a multi-barrier form of drinking water protection. DPH is also required to be notified of project activity located within a public water supply aquifer or watershed area.

An enhanced level of communication has been achieved over the past 10 years between the DWS, local health departments and PWSs enabling the watershed issues to be addressed more quickly and efficiently. Watershed Protection activity continues to be an integral process for maintaining a protective barrier for sources of drinking water and is linked logically to current SWAP grant activities. Local health departments have been instrumental in addressing local compliance issues. Continuation of this activity is also heightened by security concerns.

Water Company-Owned Land: Oversight of water company owned land is provided to DPH in legislative authority to permit sales of water company-owned land and "changes of use" on water company-owned lands. The DPH also has authority to permit or deny recreational activities on such lands. Maintaining an orderly oversight of water company land sales, changes in use and permitted activities is, in effect, a control in maintaining capacity to protect sensitive land areas.

Recent efforts have included: 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; and initiated discussions to link the water company lands laws to public water supply land use management plans. This program continues to be valuable in assuring that protective measures are being maintained in matters relating to changes in use as well as sale, or recreational use activities on water company owned lands.

Planning Activities

The planning process, which includes the Water Utility Coordinating Committees (WUCC), is designed to provide a forum that brings together water utility representatives, local officials, and other parties to discuss long-range water supply planning issues, establish exclusive service areas (ESA), and produce a coordinated water supply plan in each of 7 water supply management areas statewide. Through this process, PWSs are encouraged to develop the capacity to provide appropriate regional drinking water service and thereby executing their responsibilities.

This program has served as a good tool, formalizing current and future regional water supply activities of the major PWSs within the State. The provision of adequate, safe water resources for growth and economic development has been highlighted by WUCC activities in the Southeast, where issues concerning future development and water system expansions have been a source of local debate.

During the past year, the need to complete this planning process for the remaining 3 management areas has become more of a priority. DPH intends to hold WUCC meetings in all convened areas, within available staffing resources, to discuss regional plans and solicit member input regarding regional water supply planning and solutions to known problems.

This unit is also responsible for the review of Water Supply Plans, which are required to be submitted by the larger water utilities and updated every 5 years. These plans are an assessment of the water system and must include projections for the 5-, 20-, and 50-year planning periods, including a Capital Improvement Plan for the water supply system. During the period 7/1/2007 – 6/30/2008, 10 water supply plans were received for review.

2. ***Based on the existing system strategy, how has the State continued to identify systems in need of capacity development assistance?***

Answer: The DPH identifies and prioritizes systems for capacity development assistance using compliance data including data contained in the Safe Drinking Water Information System (SDWIS) State database and data obtained from sanitary surveys. The selection of PWSs requiring additional assistance is primarily accomplished by two mechanisms.

The first mechanism is the sanitary survey process and the resulting compliance determinations. During a sanitary survey the physical infrastructure of the water system is assessed to determine if there are significant violations or deficiencies that could present long and/or short term sustainability problems. For most community water systems much of their water system assets are buried (i.e. distribution and transmission water mains) and cannot be inspected during sanitary surveys. The DWS has incorporated many additional question sets into the sanitary survey process to determine if systems are adequately employing sustainability concepts. These question sets include discussions on financial and managerial capacity topics including asset inventories, asset management, capital improvement plans, budgeting and rate setting. These areas of financial and managerial analysis are particularly important when visible infrastructure deficiencies are identified that may be caused from neglect, insufficient revenue/reserve funds or an inadequate sustainability program. Sanitary surveys are conducted at least every 3 years for community water systems and every 5 years for non-community (NTNC and TNC) systems.

The second mechanism used to identify systems in need of capacity development assistance is the ability of a system to respond to the compliance requirements for prescribed regulation implementation and to report this compliance data to the DWS. Compliance data is managed in SDWIS and compliance determinations are run on an on-going basis. Examples of data that may identify a system in need of assistance would include Maximum Contaminant Level (MCL) violations, Monitoring and Reporting (M&R) violations and Treatment Technique (TT) violations among others. Greater than one monitoring and reporting violation in a 12-month period is used as a trigger of possible deficiencies in managerial and possibly financial capacity and formal enforcement actions are initiated. This approach attempts to avoid systems from becoming SNCs. Systems that are, or become, SNCs are given priority technical assistance consistent with Connecticut's existing strategy.

Operator certification problems can also 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 lack the required operator. Common reasons for systems not having a certified operator include: failure of operators to renew their certification, Conditional (grandfathered) Operators that leave a system, change of system ownership, and termination of contracts with operators. Operator certification problems are addressed through technical assistance by the OCP, followed by progressive enforcement (violation letter, order, civil penalty). Some water systems have numerous monitoring and reporting violations. The MRE Unit refers these systems to the OCP. The OCP then follows up with technical assistance and uses this as a trigger for possible disciplinary action against operators. The OCP utilizes a database query to automatically generate lists of systems with numerous violations or multiple systems operated by the same operator with numerous violations. These lists are generated on an on-going basis. This data is used to set up technical assistance meetings with operators, and to begin the disciplinary action process, if necessary. Water systems may have questions or appeals on enforcement actions. This could be an indication of operators not understanding the regulations. These issues are also 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.

A CWS's ability to build consumer confidence in the drinking water they provide is also considered an important capacity development element. A CWS's compliance with the consumer confidence reporting is also used as a trigger for technical assistance.

3. ***During the reporting period, if statewide PWS capacity concerns or capacity development needs (TMF) have been identified, what was the State's approach in offering and/or providing assistance?***

Answer:

The sanitary survey process has been successful in recognizing common trends in sustainability deficiencies with all public water systems. Smaller systems fail to recognize the need to plan for the future and make necessary adjustments to their water rates (or business profits in the case of most non-community systems) to have sufficient reserve funds for capital improvements. They also are challenged in understanding and complying with the ever increasing number of new regulations being developed and implemented. Many small CWS charge flat rates for water and do not periodically review these rates as compliance and operational costs increase and their water system infrastructure depreciates.

The IRU staff is very involved in promoting mutual aid among public water systems, and in preaching community outreach and regional planning in areas where systems' consolidation is feasible or where drinking water infrastructure needs improvement. This is especially true with small water systems. Thirty-four (34) public water system consolidations occurred during the period of 7/1/07 through 6/30/08 including 9 CWS, 9 NTNC, and 16 TNC systems. Small systems are always encouraged to pursue interconnections with larger CWS when feasible interconnections exist as a method of resolving their violations and capacity deficiencies.

When consolidation is not a feasible option, troubled small CWS are encouraged to achieve sustainability by:

- Inventorying their assets
- Preparing asset management plans
- Preparing capital improvement plans
- Preparing a budget with capital reserve contingencies
- Reviewing and adjusting their water rates annually
- Ensuring customer payment of water bills
- Having a sound organizational structure
- Having operational and emergency procedures
- Having well trained operators

The CRS Unit makes extensive use of EPA sustainability handbooks and DWSRF program outreach to provide the pathway and financial means of achieving compliance and sustainability. Some small systems are not capable or willing to implement these sustainability measures and they continue to fall further out of compliance. The failure of an existing CWS to comply with either the DPUC or the DPH regulations could require joint hearings to determine the system's economic viability. If it is determined that the CWS is not viable, the DPUC, with DPH's consultation, may order the acquisition of the CWS by the most suitable entity. This is a two-step process; the first step is a thorough evaluation of the CWS's ability to provide TMF capacity. The second is the determination of possible restructuring or acquisition by a more reliable and sound CWS.

The "take-over" process has typically resulted in more viable systems or the elimination of an existing CWS. Non-viable CWS's tend to chronically fail to achieve compliance in areas such as water quality monitoring, 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.

Similarly, compliance tracking by the MRE Unit has resulted in recognizing common trends with different types and sizes of systems. This compliance data has revealed the specialized needs of small water systems and has resulted in adjustments to the training curriculum of small system operators that is provided by the OCP. It has been recognized that small systems rely heavily on their certified operators to maintain compliance with drinking water regulations and perform or arrange for all preventive and corrective maintenance to the system. This training has been described under the "Operator Certification Program Activities" earlier in this document. In contrast to the broader overview of the small system operator training offered by the DWS, the training curriculum for larger systems with multiple treatment and distribution systems operators may be more specialized to a specific operator's duties.

The DWS also makes extensive use of our website to provide a broad range of information to public water systems to assist them with achieving compliance and providing them with access to important information.

4. ***If the State performed a review of implementation of the existing systems strategy during the previous year, discuss the review and how findings have been or may be addressed.***

   Answer: No review was performed on the existing systems strategy during the previous year. However, the DWS Capacity Development Strategy is being reviewed in 2008 with a revised strategy anticipated to be submitted to EPA Region 1 by December 31, 2008.

5. ***Did the State make any modifications to the existing system strategy? If so, describe.***

   Answer: No

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Attachment #1
New PWS created througth the CPCN process

PWSID	NAME	TYPE	CITY	ACTIVATION DATE	SNC List?
CT0081104	BETHANY VOLUNTEER FIRE DEPT HQ	NC	BETHANY	5/18/2007	
CT0309094	ICA DONUTS, LLC	NC	COLUMBIA	8/22/2005	
CT0389153	9 OZICK DRIVE	NTNC	DURHAM	9/10/2007	
CT0389163	DISTINCTIVE BUILDING - 45 OZICK DRIVE	NTNC	DURHAM	10/1/2007	YES
CT0429121	EAST HAMPTON WPCA - ROYAL OAKS SYSTEM	C	EAST HAMPTON	1/1/2006	YES
CT0429153	THEATER SQUARE	NTNC	EAST HAMPTON	4/23/2008	
CT0614024	201 SAYBROOK ROAD	NC	HADDAM	1/5/2007	YES
CT0614034	THE RIVERHOUSE AT GOODSPEED STATION	NC	HADDAM	6/21/2007	
CT0709153	HADDAM KILLINGWORTH INTER/MIDDLE SCHOOL	NTNC	KILLINGWORTH	11/22/2006	YES
CT0869104	1434 ROUTE 85	NC	MONTVILLE	2/9/2006	
CT0878023	WINVIAN FARM COUNTRY INN - MAIN SYSTEM	NTNC	MORRIS	12/27/2006	
CT0878024	WINVIAN FARM COUNTRY INN -COTTAGE SYSTEM	NC	MORRIS	12/27/2006	
CT0969373	BULLS BRIDGE GOLF CLUB	NTNC	NEW MILFORD	6/7/2007	
CT0979384	CONGREGATION ADATH ISRAEL-115HUNTINGTOWN	NC	NEWTOWN	8/29/2007	
CT1021063	KIDDS & CO., LLC	NTNC	NORTH STONINGTON	3/12/2008	
CT1059203	CHURCH OF CHRIST THE KING	NTNC	OLD LYME	9/2/2005	
CT1301133	SOUTHFORD RETAIL CENTER	NTNC	SOUTHBURY	7/10/2007	
CT1429201	IVY WOODS	C	TOLLAND	1/3/2007	
CT1609124	WILLINGTON PUBLIC LIBRARY	NC	WILLINGTON	11/21/2006	
CT1609133	KIDS KINGDOM DAYCARE CENTER	NTNC	WILLINGTON	3/15/2007	
CT1609141	WILLINGTON SENIOR CENTER & HOUSING	C	WILLINGTON	10/18/2007	
CT1669124	1515 WOLCOTT ROAD	NC	WOLCOTT	1/31/2007	

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Attachment #2
Newly Identified PWS

PWSID	NAME	TYPE	CITY	ACTIVATION DATE	SNC List?
CT0039033	KIDDERBROOK MONTESSORI SCHOOL	NTNC	ASHFORD	6/23/2006	YES
CT0081084	COUNTRY CORNER DINER LLC	NC	BETHANY	5/26/2006	
CT0081094	STEVES DELI	NC	BETHANY	8/7/2006	
CT0099273	STONY HILL INN & GOLF PRO SHOP	NTNC	BETHEL	7/26/2005	
CT0099274	47 STONY HILL ROAD	NC	BETHEL	7/11/2007	
CT0105044	WELLSPRING FOUNDATION - ANGELUS	NC	BETHLEHEM	12/14/2006	
CT0105053	WELLSPRING FOUNDATION - SHILOAH	NTNC	BETHLEHEM	12/14/2006	
CT0121031	166-168 BOSTON TURNPIKE	C	BOLTON	3/18/2008	
CT0121041	180 BOSTON TURNPIKE	C	BOLTON	3/18/2008	
CT0179044	249 TERRYVILLE ROAD	NC	BRISTOL	1/8/2007	
CT0179054	739 TERRYVILLE AVE	NC	BRISTOL	1/11/2007	
CT0189793	ST MARGUERITE BOURGEOYS CHURCH	NTNC	BROOKFIELD	8/14/2007	
CT0189831	BROOKFIELD WATER COMPANY - EXTENSION 2A	C	BROOKFIELD	4/1/2006	
CT0189864	439 CANDLEWOOD LAKE RD	NC	BROOKFIELD	3/1/2007	
CT0189873	PHARMCO PRODUCTS	NTNC	BROOKFIELD	8/8/2007	
CT0189874	BURGER KING - BROOKFIELD	NC	BROOKFIELD	9/26/2007	
CT0189884	457 FEDERAL ROAD, LLC	NC	BROOKFIELD	8/25/2008	
CT0189894	174 FEDERAL ROAD	NC	BROOKFIELD	1/30/2008	
CT0189914	305 FEDERAL ROAD	NC	BROOKFIELD	3/25/2008	
CT0189923	125 COMMERCE DRIVE	NTNC	BROOKFIELD	4/1/2008	
CT0199091	GORMAN ROAD APARTMENTS	C	BROOKLYN	10/19/2006	
CT0199103	LEARNING CLINIC - OVERLOOK	NTNC	BROOKLYN	4/16/2008	
CT0199104	LEARNING CLINIC - PONDVIEW	NTNC	BROOKLYN	4/16/2008	
CT0229044	KNOLLWOOD PLAZA	NC	CANTERBURY	1/17/2008	
CT0235074	306 ALBANY TURNPIKE	NC	CANTON	1/30/2007	
CT0248014	ZLOTNICKS GARAGE LLC	NC	CHAPLIN	3/27/2007	
CT0248024	52 WILLIMANTIC ROAD	NC	CHAPLIN	3/27/2007	
CT0279044	INDIAN RIVER RECREATIONAL COMPLEX	NC	CLINTON	5/15/2007	
CT0309104	CAMP ASTO WAMAH - INFIRMARY	NC	COLUMBIA	4/1/2006	
CT0309114	CAMP ASTO WAMAH - HUNGERFORD	NC	COLUMBIA	4/1/2006	
CT0309124	52 ROUTE 66	NC	COLUMBIA	4/9/2007	
CT0363064	RICHCAT, LLC	NC	DEEP RIVER	5/22/2007	
CT0389164	BRAGA INVESTMENTS LLC	NC	DURHAM	10/9/2007	
CT0399024	STILL RIVER CAFE	NC	EASTFORD	8/3/2006	
CT0399034	CHARLIE BROWN CAMPGROUND-REC HALL	NC	EASTFORD	10/12/2006	
CT0408024	EAST GRANBY FARMS	NC	EAST GRANBY	12/12/2006	
CT0429133	GLOBAL SELF STORAGE	NTNC	EAST HAMPTON	6/25/2007	
CT0429143	3 SMITH STREET	NTNC	EAST HAMPTON	12/18/2007	
CT0473024	FLAHERTY FIELD TRIAL AREA	NC	EAST WINDSOR	9/25/2006	
CT0530234	FRANKLIN MUNICIPAL COMPLEX	NC	FRANKLIN	7/11/2006	
CT0530243	THE PLANT GROUP, INC	NC	FRANKLIN	1/31/2007	
CT0579144	FAIRVIEW COUNTRY CLUB - CARRIAGE HOUSE	NC	GREENWICH	12/21/2006	
CT0609074	THE LITTLE STORE	NC	GUILFORD	6/22/2006	YES
CT0609084	LAKE QUONNIPAUG	NC	GUILFORD	6/23/2006	
CT0609094	BITTNER PARK	NC	GUILFORD	6/23/2006	YES
CT0609103	GUILFORD VETERINARY HOSPITAL	NTNC	GUILFORD	9/12/2007	
CT0609104	GUILFORD AGRICULTURAL SOCIETY	NC	GUILFORD	6/5/2008	
CT0688021	THE MARVELWOOD SCHOOL-FACULTY HOUSES	C	KENT	3/16/2006	YES
CT0709143	KILLINGWORTH KIDS CENTER	NTNC	KILLINGWORTH	1/24/2006	
CT0709154	SHELDON FIELD	NC	KILLINGWORTH	6/20/2006	
CT0709164	THE COOKING COMPANY - KILLINGWORTH	NC	KILLINGWORTH	3/15/2007	
CT0709174	183 ROUTE 81 LLC	NC	KILLINGWORTH	8/2/2007	
CT0740624	COZY HILLS CAMPGROUND - WELL 3	NC	LITCHFIELD	5/2/2008	
CT0745113	THE VILLAGE SCHOOL, INC.	NTNC	LITCHFIELD	1/31/2007	

PWSID	NAME	TYPE	CITY	ACTIVATION DATE	SNC List?
CT0745124	WEST SHORE SEAFOOD LLC	NC	LITCHFIELD	2/26/2007	
CT0819031	CTWC - NAUGATUCK REG - HILLCREST	C	MIDDLEBURY	5/18/2005	
CT0819041	CTWC - NAUGATUCK REG-HERITAGE/MIDDLEBURY	C	MIDDLEBURY	5/18/2006	
CT0900133	ST LUKES SCHOOL ATHLETIC CENTER	NTNC	NEW CANAAN	12/13/2006	
CT0915224	ST. EDWARD ROMAN CATHOLIC CHURCH-AMC	NC	NEW FAIRFIELD	8/30/2006	
CT0969361	UNITED WATER CT, INC.-PARK GLEN SYSTEM	C	NEW MILFORD	5/25/2006	YES
CT0979284	130 MOUNT PLEASANT ROAD	NC	NEWTOWN	8/27/2007	
CT0979354	SUGAR HILL, LLC	NC	NEWTOWN	2/8/2007	YES
CT0979364	1 GLEN ROAD	NC	NEWTOWN	7/11/2007	
CT0979374	3 GLEN ROAD	NC	NEWTOWN	7/11/2007	
CT0979393	144 SUGAR STREET	NC	NEWTOWN	7/24/2007	
CT1019024	THE ONLY GAME IN TOWN	NC	NORTH HAVEN	8/21/2006	
CT1080504	100 OXFORD ROAD	NC	OXFORD	4/21/2008	
CT1099134	FRANKOS PIZZA & RESTAURANT	NC	PLAINFIELD	11/8/2006	
CT1099141	ARNIO LAKE REALTY LLC	C	PLAINFIELD	10/22/2007	
CT1099144	518 NORWICH ROAD	NC	PLAINFIELD	1/28/2008	
CT1099154	15 EAST MAIN STREET LLC	NC	PLAINFIELD	1/28/2008	
CT1099164	597 PUTNAM ROAD	NC	PLAINFIELD	5/27/2008	
CT1149044	PRESTON COMMUNITY PARK - 10 LINCOLN RD	NC	PRESTON	5/1/2008	
CT1159054	JVP BUILDING	NC	PROSPECT	10/16/2006	
CT1179124	2 MAIN STREET	NC	REDDING	10/1/2007	
CT1189513	590 DANBURY ROAD LLC	NTNC	RIDGEFIELD	1/8/2007	
CT1189514	STONEHENGE INN	NC	RIDGEFIELD	2/1/2007	
CT1249033	GREAT HILL UNITED METHODIST CHURCH	NTNC	SEYMOUR	11/8/2007	
CT1249043	COMCAST CABLE COMMUNICATIONS, LLC	NTNC	SEYMOUR	2/25/2008	
CT1259134	CORNWALL BRIDGE CITGO	NC	SHARON	5/25/2006	
CT1299033	GROWER DIRECT FARMS INC	NTNC	SOMERS	5/13/2008	
CT1311034	KARABIN FARMS	NC	SOUTHINGTON	11/3/2005	
CT1311044	PANTHORN PARK UPPER RESTROOM	NC	SOUTHINGTON	4/19/2007	
CT1311054	1103 QUEEN STREET	NC	SOUTHINGTON	12/26/2007	
CT1331024	51 WEST MAIN STREET	NC	SPRAGUE	1/17/2007	
CT1331033	MOHEGAN SUN COUNTRY CLUB AT PAUTIPAUG	NTNC	SPRAGUE	5/14/2007	
CT1419063	SCRIBBLES KID CARE	NTNC	THOMPSON	6/27/2008	
CT1429204	FRIENDLY SERVICE STATION #39	NC	TOLLAND	3/13/2007	
CT1479021	VOLUNTOWN HOUSING AUTHORITY	C	VOLUNTOWN	4/24/2008	
CT1501143	MAYFLOWER SPA	NTNC	WASHINGTON	12/14/2006	
CT1539024	VFW POST 5157	NC	WATERTOWN	6/9/2006	
CT1539031	WATERTOWN WATER & SEWER - WESTGATE	C	WATERTOWN	8/1/2006	
CT1539034	MOUNT OLIVET CEMETERY	NC	WATERTOWN	5/20/2008	
CT1560014	LOVE TEMPLE CHURCH OF CHRIST IN PRAYER	NC	WEST HAVEN	12/19/2005	YES
CT1609134	SCHOFIELD SPRING	NC	WILLINGTON	11/28/2007	
CT1615144	WOODCOCK NATURE CENTER INC	NC	WILTON	5/29/2008	
CT1620214	THE SPORTS DOMAIN	NC	WINCHESTER	10/26/2005	
CT1631214	APOLLO RESTAURANT AND PIZZA	NC	WINDHAM	5/15/2007	
CT1650094	329 ELLA GRASSO TURNPIKE	NC	WINDSOR LOCKS	5/23/2008	
CT1669114	2 NORTH ST LLC	NC	WOLCOTT	10/4/2006	
CT1669134	421 WOLCOTT ROAD	NC	WOLCOTT	4/22/2008	
CT1670174	ACADEMY SKATE PARK	NC	WOODBRIDGE	1/25/2007	
CT1670184	WOODBRIDGE C.C. - HALFWAY HOUSE	NC	WOODBRIDGE	7/19/2007	
CT1699053	SOLAIR RECREATIONAL LEAGUE - PAVILION	NTNC	WOODSTOCK	7/27/2007	
CT1699061	SOLAIR RECREATIONAL LEAGUE - LOWER RIDGE	C	WOODSTOCK	7/27/2007	
CT1699071	SOLAIR RECREATIONAL LEAGUE - BEAVER BATH	C	WOODSTOCK	7/27/2007	
CT1699074	SOLAIR RECREATIONAL LEAGUE - FOX HOLLOW	NC	WOODSTOCK	7/27/2007	