

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



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### ENVIRONMENTAL HEALTH AND DRINKING WATER BRANCH

Circular Letter #2020-32

**TO:** Community Water Systems  
**FROM:** Lori J. Mathieu, Branch Chief   
**DATE:** May 15, 2020  
**SUBJECT:** Watershed and Cross Connection Inspections

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As the U.S. Environmental Protection Agency (EPA) stated in its March 26, 2020 Memorandum entitled [COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program](#), public water systems have a heightened responsibility to protect public health due to the fact that "unsafe drinking water can lead to serious illnesses and access to clean water for drinking and handwashing is critical during the COVID-19 pandemic". As a result, public water systems should maintain normal operations, maintenance and required sampling. In the event of worker shortages and laboratory capacity problems, however, the DPH Drinking Water Section reminds public water systems that compliance monitoring to assure the safety of drinking water supplies and the prevention of acute risks is the most critical to maintain.

Recognizing that public water systems, as well as the DPH Drinking Water Section, are focused now on the health and safety of staff and the safety of drinking water supplies and the prevention of acute risks, and recognizing that water system customers are also focused on employee safety and ultimately control access to their facilities during this pandemic, the DPH Drinking Water Section will consider the impacts the COVID-19 emergency is having on public water systems when determining whether any enforcement response is appropriate for violations of the following two state requirements, as long as the public water system documents such impact:

1. Watershed surveys: Section 19-13-B102(b) of the Regulations of Connecticut State Agencies requires public water systems using surface water as an active source of supply are required to make a sanitary survey of the watershed to the intake at least annually and submit a report on such survey to the DPH Drinking Water Section by March 1 each year covering the preceding calendar year. Public water systems should first survey those properties in its watershed with which the system has serious concerns regarding its impact to the system's reservoir based on previous inspections, including properties on which hazardous material is stored, where animals live, and sewage disposal systems with prior history of failure. If the public water system is unable to survey its entire watershed due to staffing shortages, safety concerns resulting from COVID-19, or due to



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lack of access to properties, the DPH Drinking Water Section requests that the public water system identify in its survey report those properties that it was unable to survey and the reason why the system did not survey such property.

2. Cross-Connection Inspections and Backflow Prevention Device Tests: Sections 19-13-B38a(f)(7) and 19-13-B102(f) of the Regulations of Connecticut State Agencies require public water systems to inspect consumer premises for cross-connections and test backflow prevention devices annually and report the results of such inspections and tests to the DPH Drinking Water Section on March 1 of each year covering the preceding calendar year. Public water systems should first inspect those consumer premises for cross connections and test those backflow prevention devices with the greatest risk of contaminating the system's distribution system and then inspect those premises and test those backflow prevention devices with a lower risk of contamination, such as irrigation systems. If the public water system is unable to inspect all cross connections or test all backflow prevention devices in 2020 due to staffing shortages, safety concerns resulting from COVID-19, or lack of access to facilities, the DPH Drinking Water Section requests that the public water system identify in its report those consumer premises at which it was unable to inspect cross connections and those backflow prevention devices that it was unable to test and the reason why the system did not inspect such cross connections or test such backflow prevention devices.

The DPH Drinking Water Section continues to strongly encourage public water systems to consult with it without delay if issues arise that prevent the normal delivery of safe drinking water or if a public water system anticipates that an issue may arise. Public water systems are to immediately report to the DPH Drinking Water Section at [DWDcompliance@ct.gov](mailto:DWDcompliance@ct.gov) any situations that may create an acute risk or imminent threat to public health. The DPH Drinking Water Section will continue to work closely with EPA Region 1 on measures to address the potential impacts of COVID-19 and will share with you any additional updates from EPA as they become available. Please remember that close coordination and communication during the COVID-19 emergency are necessary to assure safe drinking water supplies and the prevention of acute risks.

For the latest general information, resources, and guidance related to COVID-19, please visit the State of Connecticut's webpage at <https://portal.ct.gov/Coronavirus> and the Centers for Disease Control and Prevention's (CDC) webpage at <https://www.cdc.gov/coronavirus>.

Please do not hesitate to reach out to the DPH Drinking Water Section by electronic mail at [DWDcompliance@ct.gov](mailto:DWDcompliance@ct.gov), if you have any questions or run into any issues with respect to your public water system.

c: Heather Aaron, MPH, LNHA, Deputy Commissioner, DPH  
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