

Connecticut H₂O Operator

A Newsletter for Certified Operators

The Connecticut Department of Public Health Drinking Water Section

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Public Notification Rule

By: Christopher Roy, Sanitary Engineer 3, Monitoring, Reporting and Enforcement Unit

With the growing number of drinking water-related regulatory requirements, maintaining compliance is becoming increasingly more difficult for owners and operators of public water systems. Since non-compliance may have a direct impact on public health, consumers have a right to know the quality of the drinking water that they depend on. The Public Notification (PN) Rule requires owners of all public water systems to notify the public any time a water system violates drinking water regulations or has other situations posing a risk to public health.

The PN Rule classifies violations and situations into three tiers based on the severity of the event and the potential adverse health effects. Each tier has specific delivery and notification requirements:

- Tier 1: Acute MCL violations, Notice required within 24 hours;**
- Tier 2: Non-Acute MCL violations, Notice required within 30 days;**
- Tier 3: Monitoring & Reporting violations, Notice required within 365 days.**

The method of delivery can range from radio or television broadcast, to hand delivery to posting the notice in conspicuous locations. The clock for notification starts when the system learns of the violation through compliance calculations or other means. In addition, all Tier 1 violations require consultation with the Department (860-509-7333 or 860-509-8000 after hours).

The Drinking Water Section provides water systems with a PN template whenever a notice of noncompliance (violation letter) is sent to a water system. When filled out completely, the water system will meet the minimum content requirements of the rule. At a minimum, the content of the PN must include the following ten (10) elements:

- 1) A description of the violation or situation;
- 2) Any potential health effects;
- 3) Population at risk;
- 4) What is being done to correct the situation;
- 5) Whether alternative water supplies should be used;
- 6) Actions customers should take;
- 7) Contact information (name, address, phone number) for more information;
- 8) When the violation or situation occurred;
- 9) When the system expects to return to compliance; and
- 10) Standard distribution language (distribution to tenants when applicable)

No later than ten (10) days after completing the PN requirements, water systems must submit a Certification of Compliance that it has fully complied with the content and delivery requirements for the violation or situation. A copy of the actual public notification materials provided must also be included with the certification. A Community water system may use the annual Consumer Confidence Report (CCR) for Tier 3 notification provided the timing, content and delivery requirements are met. When using the CCR for delivery, the PN Certification of Compliance must still be submitted to the Department.



CONNECTICUT DEPARTMENT OF
PUBLIC HEALTH

Keeping Connecticut Healthy
www.dph.state.ct.us
Governor M. Jodi Rell
Commissioner J. Robert Galvin, M.D., M.P.H.

To Report a Water-Related Emergency...

CALL (860) 509-7333

(M-F 8:30a.m.-4:30p.m.)

OR...

CALL (860) 509-8000

(After Hours)



Seasonal Water Systems Beware: DON'T DRINK THE ANTIFREEZE!

By: Tiziana Shea, Sanitary Engineer 2, Capacity Review and Standards Unit

If you are a seasonal Public Water System (PWS) and you shut your water supply down for the winter, there are a few things you need to know ...

According to Regulations of Connecticut State Agencies Section 19-13-B80, the addition of antifreeze or any chemical, including those approved by the FDA, to your water system is prohibited without prior approval from the Department of Public Health.



In addition, some anti-freezes and/or chemicals react negatively with certain types of piping. For example, the DWS experienced a situation at a PWS where a “food-grade” antifreeze was added to a non-chlorinated PWS’s distribution system at the end of the season in an effort to protect the lines during the winter months. At the beginning of the following season, the PWS’s testing laboratory was unable to collect routine samples due to elevated chlorine residual in the water. After several attempts to collect samples and some deliberation, the PWS contacted the manufacturer of the antifreeze used at the end of the previous season. It was then that the PWS became aware that a main component of the antifreeze used (propylene glycol) reacts with Chlorinated Poly Vinyl Chloride piping, which was the likely culprit for the elevated chlorine levels in the non-chlorinated distribution system. The PWS was asked to stop use of the water and flush the lines extensively.

The best method for draining your seasonal PWS to prevent distribution pipe damage is to blow the lines dry with compressed air at the end of your operating season. When designing your seasonal water system, make sure that the water lines are installed BELOW the frost line and are properly pitched. This should alleviate some anxiety that lines will burst if there is any residual water in them from the end of the season.

For information please contact Tiziana Shea of the Capacity, Review and Standards Unit at 860-509-7333.

Picture Quiz



Take a look at this casing extension. What Public Health Code violations and sanitary problems can you identify? It has come to the DWJ’s attention that you can find PVC piping at your local plumbing supplier stamped with the words, “well casing”. Does that make it use legal in Connecticut?

RCSA Section 19-13-B51(a) - The material used to extend the well casing was constructed of PVC pipe. The PVC well casing must be replaced with a steel well casing extension and must be free of flaws or defects. It is strongly recommended that when replacing the extension on this well that the casing be raised above the established grade and the well pit eliminated.

RCSA Section 19-13-B51(a) & RCSA Section 19-13-B51(b) - The well pit is not watertight. It is constructed with concrete tiles along the sidewalls and a dirt floor with no drainage. Well pits must be watertight or suitably drained to insure dryness. Extending the well casing above the established grade and eliminating the well pit is the best way to address the violations associated with the well pit and offers the greatest public health protection where feasible.

RCSA Section 19-13-B51(a) - This well is not equipped with a certified watertight well cap. A bead of caulk around the well cap would not be considered a watertight arrangement. Only well caps certified to the Water Systems Council PAS-97 Standard are recognized as watertight well caps by the Drinking Water Section.

Other concerns include the fact that well pits are a corrosive environment and may be considered a confined space.

In addition, this office would be concerned that mice or other critters could enter the well, since the wiring is not in a conduit that fits tightly into the well cap. You should also note that the vent arrangement is unusual and not typical of what we generally see. In a proper casing extension with a watertight well cap, there is typically a screened vent right next to where the conduit enters the casing. Some well caps also have “mushroom-type” vents.

No. PVC well casing is not legal for use in Connecticut. Both the Well Drilling Code and the Public Health Code state that drilled well casings have to be steel.

Answers

Don't Forget to Submit Your Annual Cross Connection Survey Report!

By: Joseph Higgins, Sanitary Engineer 1, Operator Certification Unit

DUE
March 1st



Each public water system (PWS) is required to submit an annual cross connection survey report to the State of CT Department of Public Health Drinking Water Section (DWS) by March 1st following the year of the report. All 2006 Cross Connection Survey Reports must arrive at our DWS office by March 1st, 2007. Cross connection survey report forms and exemption verification forms can be found on the DWS web page <http://www.dph.state.ct.us/BRS/Water/DWD.htm>. There are two types of Cross Connection Survey Report forms, one for PWSs with populations greater than one thousand persons, and another for PWSs serving a population of one thousand persons or less.

A PWS may submit an Exemption Verification Form and do not have to submit an annual cross connection survey report if they do not supply water to any premises that have any of the following “**Categories of Concern**”:

- (1) Any water supply source other than that of the public water system is known to exist.
- (2) Toxic or objectionable chemical or biological substances are used in water solution on public, commercial or industrial premises.
- (3) Water pressure is raised by pumping on other than residential premises above that furnished by the supplier.
- (4) There is a water storage tank, public swimming pool or water filter, for other than residential use.
- (5) There is known to be a sprinkler system for either fire protection or irrigation.

All testable devices are to be tested annually, and all inspections are to be performed every one or five years based on the “Categories of Concern” shown above. Reports may be rejected if required information is not provided correctly. Submitting a correct Cross Connection Survey Report will save time and effort for all concerned. The following are items to check before you submit your report.

- ◆ The Survey Year of the report reflects the year in which the testable devices are tested.
- ◆ Public Water System name and Public Water System ID# are listed correctly and clearly.
- ◆ Printed and Signed names of all testers/inspectors are listed on the report as well as the correct certification number. All tests listed on the report are performed by a certified tester, and all inspections on the report are completed by a certified inspector.
- ◆ Each consumer premise has at least one corresponding “Category of Concern” which is to be listed as a number from 1-5.
- ◆ Violations at a certain consumer premise should be summarized and explained in the comment section if they were not corrected at the time the report was completed.
- ◆ Device tests should be correctly summarized in section *F.) Testing Backflow Prevention Devices*. If there are no such devices at the consumer premise listed, a zero should be placed in the column labeled *Total*.
- ◆ The Cross Connection Survey Report form for PWS’s serving a population greater than one thousand persons should separate consumer premises based on “Categories of Concern” into annual and five year inspection summaries.

If you have any questions, please contact Joseph Higgins of the Operator Certification Unit at 860-509-7333.

Permit Required to Sell Water Company What if my Community Water System is Being Sold?



By: Paula Pendleton, Lead Planning Analyst, Source Water Protection Unit

In order to protect the purity and adequacy of the source that provides drinking water to your customers, the land around a well or reservoir needs protection and is considered at a higher risk for contamination. Such land could be considered Class I water company land if it meets the criteria of the Class I water company land definition. Connecticut General Statute (CGS) Sec. 25-32(d) states water company Class I land can be sold to another water company, a state agency or a municipality. The owner needs to be aware that the buyer meets this criterion. Therefore, you are responsible to alert the owner of the laws if the owner of the community water company you work for is considering selling its property or land holdings. A Connecticut Department of Public Health (CT DPH) Drinking Water Section (DWS) water company land permit is required to sell a water company. This is required for all community water companies, even the small community system that serves 25 people. During the application review process, the compliance history of the system being sold will be reviewed including any violations noted during sanitary surveys. The owner of a community water company cannot close on the property and sell without first receiving this permit authorizing the sale from the DWS. To apply for a permit, contact Paula Pendleton of the Source Water Protection Unit at (860) 509-7333.

Flood and Storm Water Advisory



During and after periods of significant rainfall and excessive flooding, the Department experiences a significant increase in water quality violations among the State's Public Water Systems involving bacteria. All wells susceptible to flooding should be used only after its quality is verified. All wells that have been flooded, either in pits or low-lying areas, should be properly disinfected, and tested prior to consumption. The Department has provided an updated Flood and Storm Water Advisory for Public Water Systems concerning this issue on the DWS's web page at http://www.dph.state.ct.us/BRS/Water/Emergency_Preparadness/Emergencies.htm.

Training Registration Information



Since July 1, 2005, all training registrations have been completed on the Training Finder Real-time Affiliate Integrated Network (TRIN). TRIN is a training resource for professionals who protect the public's health. Visit the TRIN web page, <https://ct.train.org/DesktopShell.aspx>, to create a free user account and view upcoming certified operator events.

Be sure to check out the DWS's web page, <http://www.dph.state.ct.us/BRS/Water/DWD.htm>, for the latest information on:

- ◆ Certified Operator Training
- ◆ Certified Operator Exam Dates
- ◆ Upcoming DWS Events
- ◆ What's New
- ◆ Current Topics
- ◆ DWS Program Pages

This newsletter was prepared by the DWS's Operator Certification Unit and Programs Unit. If you have any questions or would like to contribute to the newsletter, please contact Vicky Carrier or another OCP staff person listed below.

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- William Sullivan - Sanitary Engineer 2- Operator Certification, Cross Connection Control
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<http://www.dph.state.ct.us/BRS/Water/DWD.htm>

