



Safe Drinking Water Primacy Assessment  
Annual Report to the General Assembly  
Public Act 19-117, Section 75

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## BACKGROUND

The Department of Public Health's (DPH) Drinking Water Section (DWS) is responsible for ensuring the adequacy and purity of Connecticut's public drinking water on a statewide basis through the administration and enforcement of a number of federal laws, including the Safe Drinking Water Act (SDWA), and state statutes. The DWS oversees and regulates approximately 2,450 public water systems, which use or rely upon approximately 4,400 high quality public drinking water sources and serve over 2.9 million residents in Connecticut. As part of its responsibility to assure safe drinking water to consumers, the DWS inspects at least 600 public water systems and processes over 500,000 drinking water quality test results annually; oversees and regulates certified operators; reviews and approves engineering plans for water treatment plants, storage tanks and other public water system infrastructure; provides technical assistance to public water systems and the communities they serve; administers the Drinking Water State Revolving Fund (DWSRF); enforces drinking water quality standards; oversees statewide water supply planning; and protects sources of public drinking water. The DWS accomplishes these goals through the dedicated work of an experienced staff comprised of sanitary engineers, environmental analysts and health program personnel.

The DWS provides the critical link between the federal and state standards and requirements and the public water systems, which are ultimately responsible for maintaining the high level of public health protection established under the SDWA. As additional and more complex drinking water standards are promulgated, individualized training for public water systems, technical assistance to water system operators and compliance assurance activities are undertaken. The department's ability to meet the complex and critical challenges and requirements associated with administering the state's drinking water program to ensure public health protection requires sufficient resources.

In 2012, budgetary forecasts indicated that the DWS would experience a steady decline in available federal funding in the coming fiscal years. The need for replacement funding to maintain existing staffing levels beginning in state fiscal year (FY) 2018 was subsequently identified. In 2016, the DPH was required by the Legislature, pursuant to PA 16-2 (May Spec. Sess.), to prepare and publish a report concerning the expenditures necessary to ensure the continued administration of safe drinking water standards for public drinking water ([Report on Fees](#)). In the following year, the Legislature adjusted the DPH's appropriation to address projected DWS funding shortfalls and authorized the assessment of community and non-transient non-community public water systems, in an amount not to exceed \$2.5 million, to support the department's ability to maintain primacy under the SDWA. This assessment authority was limited to FY 2019. The Legislature also required the DPH, in consultation with the Secretary of OPM and representatives of water companies, to develop a methodology for a safe drinking water primacy assessment upon community, transient,

and non-transient non-community public water systems. In accordance with Section 677 of PA 17-2, the DPH consulted with OPM and the water industry to draft proposed legislation that, after modification, was included within PA 19-117. The 2019 Public Act authorized the assessment to be undertaken in each of FY 2020 and FY 2021.<sup>1</sup>

The department is required, pursuant to Section 75 of PA 19-117, to report on the resources, activities, and costs that support the DPH's ability to maintain primacy under the SDWA in the previous fiscal year; the number of full-time equivalent positions that performed required functions to maintain primacy in the previous fiscal year; and quality improvement strategies the department has deployed to streamline operations to make efficient and effective use of staff and resources.

## REPORTING REQUIREMENTS

Primacy is the responsibility to implement and enforce the SDWA. Core functions of the primacy program include:

- Operating an enforcement program to ensure the public water systems comply with all safe drinking water requirements;
- Maintaining an inventory of public water systems throughout the state;
- Compiling a database to contain compliance information on public water systems;
- Conducting sanitary surveys of public water systems;
- Reviewing and approving public water system plans and specifications;
- Providing technical assistance to managers and operators of public water systems;
- Enforcing public notification, ensuring that public water systems regularly inform their consumers about the quality of the water that they are providing;
- Certifying laboratories that test drinking water samples;
- Administering Connecticut's Drinking Water State Revolving Fund program, which provides low interest loans to public water systems for planning, design and construction projects;
- Administering an Operator Certification, Backflow Prevention and Cross-Connection Program;
- Public interaction with citizens, chief elected officials, school officials and local health directors, including addressing consumer complaints and water quality concerns;
- Education of all entities regarding new requirements; and
- Source water assessment and protection.

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<sup>1</sup> The actual amount assessed in FY 2020 was \$1.525 million. The DPH has collected 98.02% of this amount and continues to follow up with delinquent public water systems. The DWS may recommend additional collection efforts, undertaken by the Department of Administrative Services, for systems that do not pay after three documented attempts.

In FY 2020, the DPH employed 57.78 full-time staff to perform the required functions to maintain primacy. All staff directly or indirectly support critical core functions of Connecticut's drinking water primacy program. The cost of maintaining primacy under the SDWA, reflecting state and federal funding, was \$9,001,547.

It is important to note that during the course of this year, COVID-19 spread throughout the world, the nation, and severely affected the State of Connecticut. In mid-March Governor Lamont declared a Public Health Emergency which led to an abrupt change to the department's work environment. Utilizing its remote resources, such as laptops and VPN capability, the DWS transitioned to telework to keep staff safe and healthy. The DWS also implemented several quality improvement strategies that contributed to streamlined operations and the efficient and effective use of staff and resources in FY 2020. These include:

**Developed Remote Sanitary Survey Protocol** - The DWS Capacity Development Unit and Technical Review & Field Assessment Unit worked to create a remote sanitary survey protocol for both groundwater and surface water systems. This protocol has allowed the DWS to continue to conduct the core mission of sanitary surveys during the pandemic while maintaining consistency among staff. One key change was to include an inventory review of water system facilities during the survey to help keep data updated, which has historically been a challenge. Additionally, water quality is being analyzed for trends to try to identify issues proactively and/or resolve issues, including cases of recurring bacteria.

**Held Weekly Public Water System Conference Calls** – Following the Governor's Public Health Emergency declaration in March, the DWS held weekly public water system (PWS) conference calls to update PWSs on important details and to give PWS representatives an opportunity to voice concerns. More information regarding these calls can be found here:

<https://portal.ct.gov/DPH/Drinking-Water/COVID-19/COVID-19---Information-for-Public-Water-Systems>

**Streamlined Enforcement Process for Issuing Violations** - The DWS has removed unnecessary steps in the enforcement process for issuing violations. Public water systems now receive violations electronically which has saved time, money and consumable resources.

**Streamlined Process for Water Supply Plan Review** - The DWS previously developed a streamlined process for reviewing water supply plans to ensure they are reviewed quickly and thoroughly. During FY 2020 the DWS continued this mission by developing a team that has been trained on the new process and is ready to begin reviews.

**Held Weekly Certified Operator Status Check-ins** - Following the Governor's Public Health Emergency declaration, the DWS held weekly certified operator meetings to hear about issues that large and small public water systems were facing, including supply chain delays and staffing shortages. This effort helped the DWS get ahead of issues before they became a crisis.

**Streamlined OCCT Submittal and Review** - The Capacity Development Unit has taken steps to streamline the Optimal Corrosion Control Treatment (OCCT) submittal process for public water system owners and operators. Additionally, a process has been developed for streamlined review of OCCT projects by DWS staff.

**Implemented Online Certification Processing** - The Operator Certification Program worked within the current E-License software to allow for online certification processing. Historically, licenses were received by paper mail and processed by hand. This development will allow for significantly quicker turnaround times for certified operator license issuance and renewal.

**Developed Provisional Water Operator Certification Application Forms** - The Operator Certification Program developed application forms for provisional water operators to apply to the DPH for certification in the event there was an operator workforce shortage due to the pandemic.

**Developed New Standard Operating Procedure** - The Operator Certification Program developed a new standard operating procedure for electronic processing of cross connection survey reports. This will allow for staff to quickly and efficiently process cross connection survey reports and issue deficiency letters electronically, if necessary.

**Developed New Backflow Tester and Cross Connection Inspector Form Process** - The Operator Certification Program made the application process for backflow testers and cross connection inspectors more efficient by separating one form out into two separate forms. This has helped alleviate the receipt of incomplete applications, questions, and errors that result in additional processing time to correspond with the applicants.