

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

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Commissioner



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Lt. Governor

<b>Policy Name:</b>	Applicability of Regulatory Requirements to Submetered Properties	<b>Number:</b>	EHDW 2021-01-Metering
<b>Procedure:</b>	<a href="#">Page 2</a>		
<b>Applies to:</b>	Public Water Systems that use submetering to bill tenants		
<b>Position Responsible:</b>	Lori Mathieu, Branch Chief, Environmental Health & Drinking Water		
<b>Effective Date:</b>	8/10/21	<b>Last Reviewed:</b>	
<b>Approved</b>	<i>Heather Aaron</i>	<b>Date</b>	09/27/2021

### PURPOSE:

This policy and procedure will allow a Public Water System (PWS) that meets certain criteria, to retain exemption status from the National Primary Drinking Water Standards even if it uses submetering to bill tenants for water usage. This policy aligns with the 2003 EPA guidance, WSG 171.

### SCOPE:

This policy will apply to a PWS that meets the criteria outlined below.

### DEFINITIONS:

“Submetering” means a billing process by which a property owner bills tenants based on metered total water use.

“Public water system” or “system” means any water company supplying drinking water to 15 or more consumers or 25 or more persons, based on the “Design Population” as defined in section 16-262m-8(a)(3) of the Regulations of Connecticut State Agencies, daily at least 60 days of the year that does not meet all of the following conditions:

- (A) Consists only of distribution and storage facilities;



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- (B) Does not have any treatment facilities, other than those for non-potable use;
- (C) Obtains all of its water from, but is not owned or operated by, a public water system
- (D) Does not separately bill the consumers for water use or consumption; and
- (E) Is not a carrier which conveys passengers in interstate commerce.

**POLICY:**

The Environmental Health and Drinking Water Branch is establishing a policy concerning the applicability of the Safe Drinking Water Act to submetered properties. The policy allows PWS to retain exemption status even if it uses submetering to bill tenants for water usage. The PWS and the submetered property must meet certain criteria as defined below.

**PROCEDURES:**

A PWS that initiates submetering must submit a plan to Drinking Water Section, confirming all exemption criteria as outlined below.

**PROCESS:**

In order for a PWS that uses submetering to retain its exemption status, the submetered property must meet the following criteria:

- a) receives all of its water from a public water system;
- b) has a limited distribution system with no known backflow or cross connection issues;
- c) has the majority of its plumbing within a structure instead of underground;
- d) is owned by a single/ individual, or in the case of coops or condominiums, an association of property owners; and
- e) does not serve a large or mixed (commercial/ residential) population.