



Notification Requirements



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Topics

- 💧 Types of Reporting Requirements
- 💧 Emergencies Defined
- 💧 Acceptable Means of Reporting
- 💧 Effective Communication & Coordination
- 💧 Technical Assistance & Emergency
- 💧 Response
- 💧 A Real World Example

Types of Reporting Requirements

- 💧 Security Threats/Suspicious Activity
- 💧 Routine & Non-Routine Emergencies
- 💧 Water Quality Violations
- 💧 Consultation Requirements (Tier 1 PN)



Security Threats & Suspicious Activities

RCSA Section 19-13-B46

- ◆ Requires the reporting of security threats and suspicious activities observed on or near water company land
- ◆ PWS required to **IMMEDIATELY** notify DPH and the local DOH of all applicable jurisdictions
- ◆ Notification shall be made by telephone or messenger or whatever other means of rapid communication is available
- ◆ Includes treatment interruptions, source water quality or physical damage and emergencies

Emergencies Defined

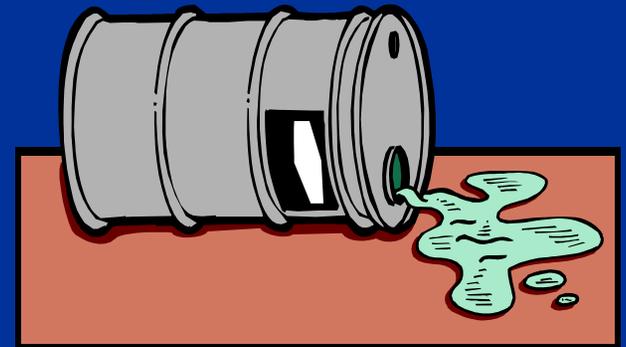
Routine Operating Emergencies

- 💧 Water main breaks
- 💧 Pump malfunctions
- 💧 Maximum Contaminant Level (MCL) violations
- 💧 Power outages



Non-Routine Emergencies

- 💧 Intentional acts of sabotage
- 💧 Chemical spills
- 💧 Natural disasters
- 💧 All emergencies affecting the normal operations of a public water system require notification to DPH.



Water Quality Reporting

RCSA Section 19-13-B102(e)(7)(I)(i)

- 💧 Routine or Repeat Fecal Coliform/E.coli positive samples reported by the end of the business day
(No later than 96 hours from sample collection)

RCSA Section 19-13-B102(h)

- 💧 MCL for total coliforms reported to DPH and the local DOH no later than the end of the next business day
- 💧 Monitoring & Reporting violations reported within 10 days after the PWS discovers the violation.
- 💧 All other MCL violations reported to DPH and the local DOH within 48 hours.

Consultation Requirements

RCSA Section 19-13-B102(i)(1)(B)

- 💧 A PWS required to perform a Tier 1 public notice shall consult with DPH as soon as possible but no later than 24 hours after learning of the violation.
- 💧 Tier 1 public notice required within 24 hours of the following violations:
 - 💧 Acute total coliform MCL
 - 💧 Nitrate, Nitrite or total Nitrate/Nitrite MCL
 - 💧 Chlorine Dioxide MRDL
 - 💧 Turbidity MCL
 - 💧 Waterborne disease outbreak
 - 💧 IOCs, VOCs and SOCs detected at levels exceeding an Maximum Contaminant Level



Definitions

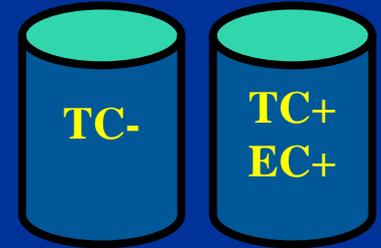
RCSA Section 19-13-B102(a)

- 💧 **Consultation** – A telephone call at which the public water system reports to DPH the nature of the violation and DPH, in turn, determines the appropriate action to be taken.
- 💧 **Waterborne Disease Outbreak** – The significant occurrence of acute infectious illness, epidemiologically associated with the ingestion of water from a PWS as determined by DPH.



Time for a Test :

- ◆ A PWS is required to collect 2 routine total coliform bacteria samples every month. The routine samples are collected in September.

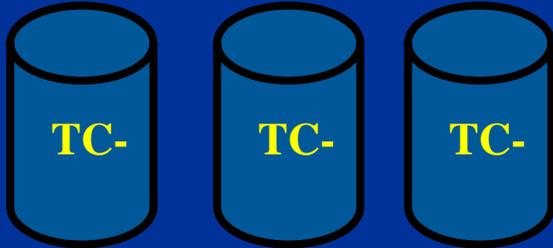


What needs to happen next?

Notification to DPH of E.coli or fecal coliform positive sample by the end of the next business day but no later than 96 hours from sample collection.

RCSA Section 19-13-B102e (7)(I)(i)

How many repeat samples are required?



Routine Samples / Month	# Repeat Samples / positive
1 / Month or fewer	4
2 / Month	3
3 / Month	3
4 / Month	3
5 / Month or more	3

What does this mean and what happens next?

The system has not exceeded the MCL for total coliforms; however increased monitoring is required the next month = 5 routine samples

REMINDER

Total Coliform Rule

Increased Monitoring Requirements

- 💧 If a system collecting fewer than five (5) samples per month has one (1) or more total coliform positive samples and the sample results are not invalidated by the Department, then the system must collect at least five (5) routine samples the next month the system provides water to the public.
- 💧 [RCSA Section 19-13-B102e \(7\)\(G\)\(iv\)](#)

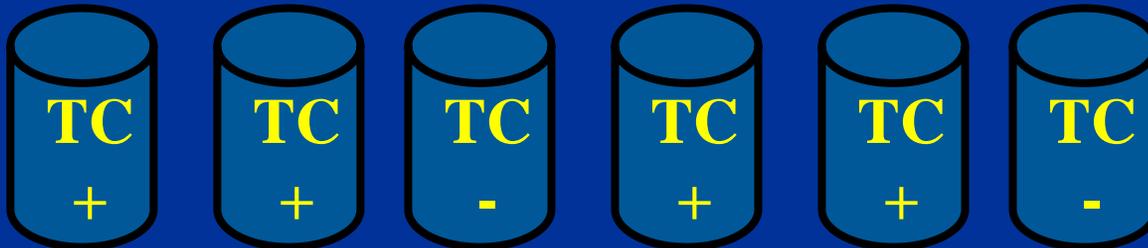
Time for a Second Test:

- 💧 The same PWS is on increased monitoring for October and is required to collect 5 routine total coliform samples.



How many repeat samples are required?

Reminder: A system collecting five or more routine samples per month must collect 3 repeat samples for every routine positive.



Has this system exceeded the MCL for total coliforms? **YES**

REMINDER

Determining Compliance with the Total Coliform Rule Maximum Contaminant Level (MCL)

- 💧 A system which collects less than 40 samples per month, where more than one sample collected in the month is total coliform positive, has exceeded the MCL.
- 💧 *RCSA Section 19-13-B102e (6)(B)*



Who needs to know?

- 💧 Report the MCL violation to the State and Local Health Department.
 - 💧 Be clear – Report MCL versus positive samples – know it's an MCL
- 💧 Identify the population that is being affected and consider providing additional notice to affected customers:
 - 💧 If a school, inform the School's Principle and/or Superintendent of the water quality violation.
 - 💧 Public notice of a water quality violation should be distributed to parents/guardians of children attending the school versus posting.
 - 💧 If a childcare center, inform the Director of the childcare program.
 - 💧 Childcare centers licensed by DPH will be required to provide bottled water during water quality MCL exceedances.
 - 💧 Food service establishments will need to implement alternative water sources because of food service regulations requirements.
- 💧 Provide notice customers prior to a disinfecting
 - 💧 50 ppm solution of chlorine may burn eyes and/or skin

Non-Regulatory Reporting Requirements

- 💧 Water Main Breaks
- 💧 Treatment Excursions
- 💧 Water Quality Issues
- 💧 Widespread Consumer Complaints
- 💧 Losses in Pressure
- 💧 Trucking in of Potable Water



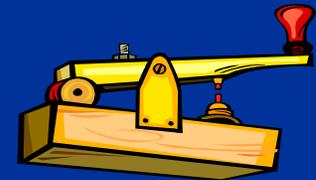
Reporting Format



- ☹ **Phone Call – DPH is a 24/7 agency**
 - ☹ DWS business hours – 860-509-7333
 - ☹ DPH non-business hours – 860-509-8000



- ☹ **Messenger**
- ☹ **Any other means of rapid communication**
- ☹ **Local Health Department and Director of Health contact information is maintained on the DPH Local Health Administration website: https://www.han.ct.gov/local_health/localmap.asp**
- ☹ **All required reports to DPH should be documented with the Public Water System Notification Form.**



Effective Communication & Coordination

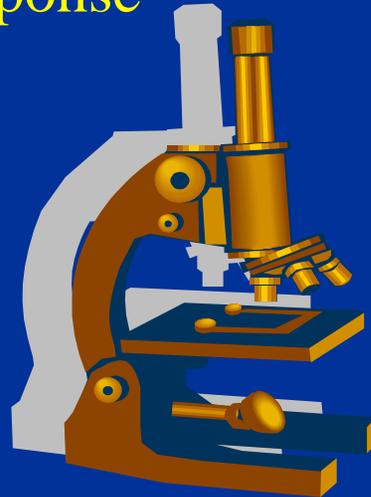
💧 Emergency Response Planning

- 💧 Who?
 - 💧 What?
 - 💧 Where?
 - 💧 Why?
- 💧 Prompt reporting and notification provides time to tailor public notification and arrange logistics
 - 💧 Consistent public notification and message to all players involved.



Technical Assistance & Emergency Response

- 💧 Prompt reporting and notification allows for effective technical assistance by DPH
- 💧 Reporting activates DPH SOPs in Emergency Response
 - 💧 Incident Reporting
 - 💧 WEAR Team Response
 - 💧 Epidemiology
 - 💧 DPH Laboratory



Real World Example

- 💧 School personnel discovered that one of the well caps to one of the school's two wells had been completely removed. Additionally, an attempt was made to remove the cover to the school's 10,000 gallon storage tank.
- 💧 The local police department was informed of the water system vandalism.
- 💧 DPH was contacted by the school's certified operator through the Department's after hours emergency phone number. 860-509-8000
- 💧 Samples were collected from the wells and storage tank.
 - 💧 Results indicated the well was positive for total coliform bacteria, negative for E.coli. Storage tank was absent for bacteria and maintained a chlorine residual of 1.10 mg/L.

Real World Example

- 💧 The school, on advise from the Director of Health, provided bottled water for an interim basis
- 💧 DPH conducted a sanitary survey inspection of the school's water system.
 - 💧 Some of the violations cited during the last inspection remained uncorrected.
 - 💧 A sanitary survey report was issued to the school. Violations and security vulnerabilities were identified.
 - 💧 The school took appropriate measures to correct violations and improve security of the school's water system infrastructure.

Before



After

