

SANITARY SURVEY PROCESS CHANGES AND MANUAL UPDATES



EFFECTIVE FALL 2008

SANITARY SURVEYS – THE REGULATORY REQUIREMENTS



- EPA mandates that each state conduct surveys of each water system it oversees.
- Oversight of the program is by EPA's Drinking Water Academy.

SANITARY SURVEYS – THE REGULATORY REQUIREMENTS



- Federal requirements allow a substantial amount of flexibility to states for how the surveys are carried out, but they specifically require that the following eight areas are included in the survey:
 - Supply, Treatment, Monitoring and reporting, Management and Operations, Pumps, Storage, Distribution, and Operator Compliance

SANITARY SURVEYS – THE GOALS



- TDEC and TAUD collectively determined that the two main goals of the sanitary survey system are:
 - *Get every system into compliance and keep them there, and;*
 - *Make the results of the survey easier to understand for the public, elected officials, the media, and for the utility itself*
- *Feedback and comments?*

SANITARY SURVEYS – THE CURRENT PROBLEMS



- No differentiation between direct threats to public health (issues of water quality and water quantity) and issues relating to paperwork and record keeping.
- Scoring
 - A utility can lose 10 points out of a possible 500+ and not be in the “approved” category.
 - A 3-point deduction in one part of the state might be a 5-point deduction in another.
 - There is no distinction between treatment/distribution systems and distribution-only systems for scoring.

→ *Feedback and comments?*

SANITARY SURVEY CHANGES – THE PROCESS



Resulting from the realization on the part of TAUD, TDEC, and other outside entities that the current process did not effectively achieve the above goals uniformly across the state, a committee was formed in 2007 to make changes to the survey process.

- The committee consisted of TAUD, Utilities, and TDEC representatives, who met several times over several months.

SANITARY SURVEY CHANGES – THE PROCESS



- The first step was to review perceived problems with the existing survey system.
- Several other states and the EPA were consulted regarding how they conducted surveys, and what worked for them. Interestingly, many states had recently been through the process of revising their survey system.
- The end result was a recognition that the current survey manual and the manner in which surveys were conducted did not need to be simply revised; it needed to be redone.
- After a two-day retreat and some follow-up meetings and draft reviews, the proposed manual is now located on TDEC's and TAUD's websites.
- It is anticipated that over the next few months, after receiving additional comments from utilities and from TDEC field offices, additional minor changes will be made until the manual is adopted this fall.

→ ***Feedback and comments?***

SANITARY SURVEYS – THE CHANGES



- **SCORING**

- Only issues relating to water quality or quantity receive points. All other issues are addressed in narrative form.
- Total score is a percentage of points received versus possible points. Treatment / distribution systems have a larger amount of possible points than distribution-only systems.
 - ✦ “Approved” systems score 95%+
 - ✦ “Provisionally Approved” systems score 90% to 94%
 - ✦ “Unapproved” systems score <90% (whole numbers – no rounding)
- No “doubling of points” for repeat deficiencies.
- No “maximum deduction” for any particular section.

- **Provision for Re-surveys**

SANITARY SURVEYS – THE CHANGES



- **Increased Communication**
 - Mandatory written response to each deficiency cited in the survey within 45 days.
 - Possibly more frequent surveys
- **Follow-up**
 - Repeat deficiencies will result in enforcement action, regardless of whether those deficiencies were assigned a point value.

→ *Feedback and comments?*

SANITARY SURVEYS – SOME THINGS THAT MIGHT BE ISSUES WITH THE NEW SYSTEM



- **“WAS a water quality issue” versus “COULD HAVE BEEN a water quality issue”.**
 - Regardless of whether no one got sick, a positive Bact was not found, etc., if actions were taken that could have compromised public health, then points will be deducted.
- **“Yes, that might be a repeat violation, but it wasn’t as bad as last time...”**
 - A repeat violation will be a repeat violation, regardless of severity, and enforcement action will be taken.
- **Perception on the part of TDEC Field Offices that the survey has been softened; that there needs to be some sort of “bell curve” for scores.**

→ Feedback and comments?

SANITARY SURVEYS



The entire sanitary survey proposed document can be found at TDEC's website and on TAUD's website.

QUESTIONS?