

## Proposed Group B Public Water System Sanitary Survey Inspection – Fact Sheet

**Purpose:** A sanitary survey is a periodic inspection of a water system facility, operations, equipment, and records used to identify conditions that may present a sanitary or public health risk.

**History:** In response to budget reductions in 2009, the Washington State Department of Health (DOH) eliminated monetary support to local public health departments for them to conduct sanitary surveys and provide technical assistance to Group B public water systems. This funding had been in place for a number of years and the reduction took many health departments by surprise. Since that time a funding source from DOH has not returned. Some counties have taken it upon themselves to enact sanitary survey fees to pay for such services to cover staff time.

**Need:** Currently Washington State ranks 4<sup>th</sup> in the nation for the number of approved public water systems. Currently, only 14.9% of Group B public water systems in Kittitas County have up to date water quality tests on file.

Kittitas County has 230 approved Group B Public Water Systems, 195 of which do not have oversight through a licensed Satellite Management Agency (SMA). These systems without SMA oversight are managed mostly by private citizens or homeowner associations who may or may not know anything about maintaining and operating a public water system. In fact, it is not uncommon for the purveyor or manager to be the person whom owns the parcel in which the community well is located. In these circumstances citizens have purchased property to later find out they have been designated the water system manager because the last property owner maintained the system. Unfortunately, routine maintenance to small public water systems is often neglected until major problems occur because the system is considered functional, until something goes wrong.

System failure or contamination can cause:

- Water borne illness
- A loss of service time
- Delay or disqualification of a loan for a potential property owner
- Delay in building permit issuance

Many small water system operators do not know that a system failure or loss of positive water pressure is one of the most common pathways that can lead to the introduction of bacteria and other contaminants.

The advantage of a sanitary survey to a public health department is that it allows for the department to maintain contact with small water system operators and help divert both public health issues and operational malfunctions from arising with the system before the negative consequences are felt and a loss of service occurs.

The advantage of a sanitary survey to a small water system operator is that the public health department can be an invaluable resource when it comes to troubleshooting water system malfunctions such as: coliform contamination issues, interpretation of regulations, cross connection contamination issues, pump cycle performance, changes in well yield, discoloration issues, pest management, pressure malfunctions, etc...

**Proposal:**

Annual Revenue / Weighted Average Cost of Inspection = Annual Workload

\$15,455 / \$336.63 = Approximately 46 Annual Inspections of Group B Public Water Systems.

- Based on this information Group B Public Water Systems in Kittitas County would receive a sanitary survey every five (5) years.
- Large impact fees during years of inspection could be spread over a number of years if the water system manager passes along an annual/monthly fee along with operational cost.

**Cost, Proposed Fee, Impact, and Revenue Projection:**

Cost: Is calculated on a cost recovery model which is based on the sum total of the staff time required to perform each task, including salaries, benefits, indirect costs, and incidentals.

Proposed Fees: Are based on the estimated cost incurred to perform a sanitary survey inspection of a Group B Water System.

Systems that currently contract with a SMA are likely to have less maintenance issues than those who do not, thus it is estimated that inspections for these systems will take less time and is the justification for the reduced fee.

<b><u>Proposed Fee Description</u></b>	<b><u>Proposed Fee</u></b>
Group B Public Water System Sanitary Survey Inspection to maintain a valid Operating Certificate (with SMA)	\$290.00 per water system / once every 5 years
Group B Public Water System Sanitary Survey Inspection to maintain a valid Operating Certificate (without SMA)	\$345.00 per water system / once every 5 years

Fee Impact: The fee impact will depend on the number of lots or connections on the water system. A Group B Water System can have anywhere from 3 to 14 connections. As a result, the estimated impact to property owners ranges from \$1.92 to \$0.35 a month.

Revenue Projection: Based on number of approved systems and proposed fee.

<b><u>Annual Criteria</u></b>	<b><u>Proposed Fee</u></b>	<b><u>Estimated Revenue</u></b>
7 Sanitary Survey Inspections of Group B Public Water Systems with a SMA contract	@ \$290.00	\$2,030
39 Sanitary Survey Inspections of Group B Public Water Systems without a SMA contract	@ \$345.00	\$13,455
	Total Revenue	\$15,485

**Workload Review:**

46 Annual Sanitary Survey Inspections X 5 years = 230 Inspections in a 5 year period

**Fee Breakdown:**

<b>Group B Water System - Sanitary Survey Inspection Cost – <u>without a SMA contract</u></b>	<b><u>Item</u></b>	<b><u>Units</u></b>	<b><u>Rate</u></b>	<b><u>Total</u></b>	<b><u>Notes</u></b>
	EH Professional Time	5.74	\$44.00	\$252.56	Initial application review (0.5 hrs), Correspondence with applicant, authorized agent, WA Dept. of Health (1.0 hrs), Environmental Health Management (0.5 hrs), Scheduling site visit (0.33 hrs). 5 year cycle inspection total Est. travel time (1.33 hrs), Site visit (0.75 hrs), Additional paperwork and follow-up (0.75 hrs), Database entry (0.33 hrs), and archiving files (0.25 hrs).
	Support Staff Time	1.9	\$30.00	\$57.00	Application intake (0.5 hrs), Database entry (0.33 hrs), Receipting & handling monies (0.80 hrs), Data Assessment (0.2 hrs).
	Health Officer Time	0.083	\$108.00	\$8.96	Health Officer Consultation (0.083 hrs)
	Incidentals	1	\$21.86	\$21.86	Software license, Computer replacement, Vehicle replacement cost.
	<b>Total Cost Recovery</b>			<b>\$340.38</b>	
	<b>Proposed Cost Recovery</b>			<b>\$345.00</b>	
<b>Current Fee</b>			<b>None</b>		

Fee Breakdown Continued:

<b>Group B Water System - Sanitary Survey Inspection Cost - <u>with SMA contract</u></b>	<u>Item</u>	<u>Units</u>	<u>Rate</u>	<u>Total</u>	<u>Notes</u>
	EH Professional Time	4.73	\$44.00	\$208.12	Initial application review (0.33 hrs), Correspondence with applicant, authorized agent, WA Dept. of Health (0.75 hrs), Environmental Health Management (0.25 hrs), Scheduling site visit (0.25 hrs). 5 year cycle inspection total Est. travel time (1.33 hrs), Site visit (0.66 hrs), Additional paperwork and follow-up (0.66 hrs), Database entry (0.25 hrs), and archiving files (0.25 hrs).
	Support Staff Time	1.9	\$30.00	\$57.00	Application intake (0.33 hrs), Database entry (0.25 hrs), Receipting & handling monies (0.80 hrs), Data Assessment (0.2 hrs).
	Health Officer Time	0.083	\$108.00	\$8.96	Health Officer Consultation (0.083 hrs)
	Incidentals	1	\$21.86	\$21.86	Software license, Computer replacement, Vehicle replacement cost.
	<b>Total Cost Recovery</b>			<b>\$286.34</b>	
	<b>Proposed Cost Recovery</b>			<b>\$290.00</b>	
<b>Current Fee</b>			<b>None</b>		



*To Protect and Promote the Health and the Environment of the People of Kittitas County*

## **GROUP B SANITARY SURVEY PROGRAM**

### **ROUTINE INSPECTION PROGRAM, DOCUMENTATION, COMPLAINT INVESTIGATION, AND ENFORCEMENT**

#### **POLICY AND PROCEDURE**

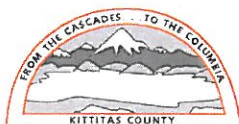
##### **Purpose**

This policy is written to establish guidelines and procedures for ensuring that Group B Public Water Systems in Kittitas County are in compliance with local and state regulations. This policy provides Kittitas County Public Health Department (KCPHD) staff with guidance protocol on how to conduct routine compliance inspections, maintain documentation, respond to and investigate public complaints, and enforcement procedures.

The Joint Plan of Responsibility Interagency Agreement with the Department of Health provides KCPHD with the authority to permit, inspect, and approve Group B Public Water Systems from 3-9 connections. WAC 246-291 and Kittitas County Code (KCC) Title 13, requires design standards, sanitary control areas, testing, water quality standards, and monitoring for Group B Public Water Systems. RCW 70.05.070 authorizes the local Health Officer to prevent, control, and abate nuisances which are detrimental to public health.

##### **Policy**

KCPHD has the discretion to permit, inspect, investigate, and respond to all complaints related to Group B Public Water Systems. By conducting a routine inspection once every five (5) years, KCPHD will be able to better ensure compliance with WAC 246-291 and KCC Title 13 Water and Sewers. This policy provides guidance for complaint investigations and enforcement procedures which will utilize KCC Title 18, Chapter 18.02.030 and outlines that KCPHD will respond to complaints within 14 business days. Creditable complaints will be investigated and documented using the Group B Sanitary Survey Inspection Form (see Appendix A). If a water system is found to be out of compliance at any time a series of increasingly stringent enforcement procedures and penalties apply, as described within this policy and KCC. This may be enforced by the Health Officer under the authority of RCW 70.05.060. Any water system that demonstrates either major or minor deficiencies at any time is required to make the necessary corrections within the stated time period determined by this policy. Any water system that proves to be non-compliant with the request made by KCPHD will be subject to the penalties outlined here and possible further legal action by the Kittitas County Prosecutors Office (KCPO).



## **Procedure**

### *Routine Inspection:*

- Group B Public Water Systems shall be inspected on a routine basis at least once every five (5) years.
- An official notification of inspection shall be sent to the water system requiring routine inspection by January 31<sup>st</sup> of every calendar year.
- KCPHD staff will contact the designated water system purveyor or property owner at least two (2) weeks prior to the anticipated date of inspection to schedule a convenient date and time that works for all parties involved.
- A Group B Sanitary Survey Inspection Form (Appendix A) shall be used for documentation purposes including documentation of the date, time, and location of the inspection, and will identify any major and minor deficiencies needing correction.
- If water system deficiencies are witnessed by KCPHD staff they shall perform the actions necessary according to the follow-up and enforcement progression protocol procedures in this policy. KCPHD staff shall explain the timeline for correcting any deficiencies and attempt to acquire a signature on the inspection form from the contact person before leaving the site.
- Upon returning to the office, KCPHD staff shall update the drinking water tracking database with case actions if deficiencies were found along with timelines for correction.
- All attempts to contact the water system shall be documented in response to scheduling a routine or re-inspection. Non-compliance by a water system to schedule an inspection with KCPHD when requested shall be handled by contacting the KCPO for advice on how to proceed.
- If KCPHD staff should feel uncomfortable or threatened in any way they shall notify the water system contact person that they are leaving the site and notify their supervisor immediately.

### *Public complaint response:*

- If a complaint that is considered to be credible is received from a member of the public or property owner with an interest in the well or persons being served by the well it shall be entered into the drinking water tracking database and investigated.
- An official notification of complaint letter shall be sent to the water system contact person via certified mail with return receipt within 14 business days to acknowledge the complaint and document KCPHD's efforts to investigate the complaint.
- An inspection of the water system which was the source of the complaint shall be conducted by public health personnel as soon as possible, but at least within 14 business days of the certified mail return receipt being returned to KCPHD.

- KCPHD staff shall attempt to contact the water system contact person by phone after the certified mail return receipt has been returned to KCPHD to schedule a convenient date and time that works for all parties involved.
- All attempts to contact the water system shall be documented in response to the complaint. Non-compliance by a water system to contact KCPHD to schedule a site visit will be handled by contacting the KCPO for advice on how to proceed with responding to the complaint.

*Emergency response:*

- Nothing in this policy shall be construed to circumscribe the authority and power of the Health Officer or their representative to act in an emergency situation to control and prevent any health hazard or nuisance which immediately threatens the public health of the inhabitants of the county, visitors, and its municipalities which power and authority is governed by state law.

**Follow-up progression**

*Routine Inspection:*

- If water system deficiencies are witnessed by KCPHD staff, then staff shall explain the timeline for correcting any deficiencies and attempt to acquire a signature on the inspection form from the contact person before leaving. KCPHD staff shall explain that follow-up notices and enforcement may apply if the noted deficiencies are not corrected within the given timeframes.
- Upon arrival back at the office and within 5 business days KCPHD staff shall re-confirm to the water system the outstanding violation(s), options for deadline extensions, and enforcement procedures in writing via certified mail with return receipt. The notice shall state that deadline timeframes began the date of first observation and inspection by KCPHD.

*Major Deficiencies:*

- Major deficiencies as identified on Group B Sanitary Survey Inspection Form (Appendix A) shall be corrected within 30 days of inspection, with the possibility of a single one-time conditional extension to be granted according to the procedures in this policy. Major deficiency corrections will be subject to a re-inspection fee and will be visually verified by KCPHD staff. If the correction does not meet the required standard then another re-inspection visit must be made to confirm the correction has been completed and meets all local, state, and federal guidelines.
- The cost of a re-inspection is subject to the most recently approved Board of Health Fee Schedule and shall be paid prior to KCPHD staff performing the site visit.

*Minor Deficiencies:*

- Minor deficiencies as identified on Group B Sanitary Survey Inspection Form (Appendix A) shall be corrected within 90 days of inspection, with the possibility of a single one-time conditional extension to be granted according to the procedures in this policy. Minor deficiency corrections will not be subject to a re-inspection fee or visit, unless the Health Officer or their representative in their discretion determines that a re-inspection in the form of a site visit must be conducted to visually confirm the necessary corrections. Otherwise, compliance confirmation can be achieved by KCPHD staff and the water system through a variety of methods which can include submittal of proper documentation, date stamped photographs, declarations, etc.

*Conditional Extension:*

- A single one-time deadline extension may be granted for a maximum period of 30 days beyond the original deadline. A single one-time seasonal request for deadline extension may be granted if the deadline is after October 31<sup>st</sup> and before April 1<sup>st</sup> of any calendar year, however in any case all corrections must be made prior to May 31<sup>th</sup>. All request for extensions must be approved by KCPHD and made in written three (3) business days before 5:00 PM of the required deadline date and must include a plan for correction. If a submitted plan for correction is deficient in any manner and the deadline has since expired, KCPHD shall deny the request for deadline extension and the originally established deadline for correction shall apply.
- KCPHD will encourage water systems applying for a deadline extension to apply well in advance of a deadline to ensure KCPHD can review and approve the request without deficiencies.

*Notice of Failure to Comply:*

- If the water system fails to correct the required deficiencies by the specified date or did not obtain an approved deadline extension from KCPHD, staff shall contact the water system in writing via certified mail with return receipt to notify the water system. Such notice shall inform the water system that the deficiency violation has existed since the inspection date, that it requires correction, and remains to be an outstanding violation and may be subject to further enforcement actions if not corrected. The notice shall also inform the water system that new connections cannot be added to the water system until the violation has been corrected.
- A notice of failure to comply letter shall provide the water system with 30 additional days to correct the deficiency with no option for deadline extension and shall inform the water system that the next enforcement action is either a Notice of Violation and Abatement (NOVA) Order or an Infraction Notice, which accompanies a monetary penalty.



## **Penalty/Enforcement progression**

### *Notice of Violation and Abatement (NOVA) Order / Infraction Notice:*

- If the water system has failed to correct the required deficiencies within the outlined timeframe, staff shall contact the water system in writing via certified mail with return receipt to issue a NOVA Order or Infraction Notice which assesses an appropriate fine according to KCC Title 18. If the penalty is not paid within 30 days of the issuance of the notice or order affirming such notice the penalty shall bear interest at the rate of 10 percent compounded monthly.
- The drinking water tracking database shall be updated with case actions.
- KCPHD staff shall notify the Department Accountant of the NOVA Order or Infraction Notice and fine issuance for financial tracking and processing purposes.
- The case shall be referred to the KCPO to charge the water system with a misdemeanor or gross misdemeanor. If applicable and at the discretion of the Health Officer, a health order may be issued.

### *Health Order:*

- Failure to comply with all orders including a NOVA Order or Infraction Notice may warrant that a health order be issued to prohibit use of the water system.
- KCPHD staff will request a health order be issued based on either a demonstration of non-compliance or emergency through the powers of the Health Officer with the concurrence of the Environmental Health Supervisor or Public Health Administrator.
- Nothing in this policy shall be construed to circumscribe the authority and power of the Health Officer or their representative to act in an emergency situation to control and prevent any health hazard or nuisance which immediately threatens the public health of the inhabitants of the county, visitors, and its municipalities which power and authority is governed by state law.

### *Severability:*

- If any provision of this policy or its application to any person or circumstance is held invalid or unconstitutional, the remainder of this policy or the application of the provisions to other persons or circumstances is not affected.



### Group B System Sanitary Survey Checklist

1. Name of System:	3. Contact:	5. Date:
2. Parcel Number:	4. Email:	6. Phone Number:

7. Describe Source	Well <input type="checkbox"/>	Spring <input type="checkbox"/>	Other <input type="checkbox"/>
8. A) DOH Source ID:			SO ID#
8.B) DOE unique well identifier number (if available)			SO ID#
9. Is this for permanent or seasonal use?			<input type="checkbox"/> Per <input type="checkbox"/> Sea
10. Are there biological contaminants located within 100 ft (i.e. sanitary sewer, drainfield, surface water, waste lagoon, manure pile, storm water, irrigation canal)?			<input type="checkbox"/> Yes <input type="checkbox"/> No
11. Are there obvious chemical contaminant hazards located within 100 ft (i.e. gasoline, diesel fuel, pesticides)?			<input type="checkbox"/> Yes <input type="checkbox"/> No
12. Is there a known or obvious risk of the wellhead being covered by flood water?			<input type="checkbox"/> Yes <input type="checkbox"/> No
13. A) Is there a sealed well cap?			<input type="checkbox"/> Yes <input type="checkbox"/> No
13. B) Is there a properly constructed screened well vent?			<input type="checkbox"/> Yes <input type="checkbox"/> No
14. A) Is the well located in a pit or is buried?			<input type="checkbox"/> Yes <input type="checkbox"/> No
14. B) If yes, is the pit adequately drained?			<input type="checkbox"/> Yes <input type="checkbox"/> No
15. Is the distance from the floor or the ground to the top of the casing greater than 6''?			<input type="checkbox"/> Yes <input type="checkbox"/> No
16. Is a water sampling tap provided at the wellhead?			<input type="checkbox"/> Yes <input type="checkbox"/> No
17. Is the source metered?			<input type="checkbox"/> Yes <input type="checkbox"/> No
18. Is this source chlorinated? If yes,			<input type="checkbox"/> Yes <input type="checkbox"/> No
A) Is chlorinator operational?			<input type="checkbox"/> Yes <input type="checkbox"/> No
B) Has there been a problem with chemical addition (i.e. maintaining adequate residual, run out of solution, overfeeding)?			<input type="checkbox"/> Yes <input type="checkbox"/> No
19. Are pressure tank(s) in use? If yes,			<input type="checkbox"/> Yes <input type="checkbox"/> No
A) Is there an ASME relief valve located between the tank and shutoff valve?			<input type="checkbox"/> Yes <input type="checkbox"/> No
B) Does the well pump and pressure tank(s) appear to be functioning/operating properly (i.e. does the well pump cycle more frequently than every 10 minutes)?			<input type="checkbox"/> Yes <input type="checkbox"/> No
20. Is there atmospheric storage?			<input type="checkbox"/> Yes <input type="checkbox"/> No
20. A) If yes, are openings secured (i.e. locked, tight over-lapping cover on access; screened vents and overflow or hinged flap)?			<input type="checkbox"/> Yes <input type="checkbox"/> No

21. Is Water Quality Monitoring (Bact., NO3) current?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
22. Is a current WFI posted onsite or on file while on inspection?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
23. Does the water system have sufficient proof that a reserve account, water well users agreements for all properties connected to the well, or proof that electrical billings are on a separate electrical meter and are equally divided?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
23. Please describe any other significant concerns or hazards observed during the site visit (i.e. existing source or storage facilities not listed on current WFI, to your knowledge were any items identified on this form identified in a previous inspection, obvious leaks in distribution system, storage or pumping facilities, unlocked pumphouses, facilities at obvious risk from tampering or vandalism, etc.)		
23. A)		
23. B)		

**Inspection Findings:**

Reason for Inspection (please circle one of the following):	Routine, Re-inspection, Complaint, Emergency
Indicate Major Deficiencies Identified (list or circle if none):	None
Indicate Minor Deficiencies Identified (list or circle if none):	None

**Timelines for Corrections:**

<u>Deficiency Type</u>	<u>Timeline Duration</u>	<u>Correction Required Date</u>	<u>Deadline Extension Options Discussed*</u>
Major Deficiencies:	Within 30 days		
Minor Deficiencies:	Within 90 days		

\*Deadline extension requests cannot be made on site. All requests for extensions must be made in writing and approved by KCPHD. KCPHD reserves the right to deny requests for deadline extensions and encourages water systems to apply well in advance to ensure KCPHD can review and approve the request without deficiencies. The signatory of this form or person requesting an extension acknowledges that KCPHD only grants one-time deadline extensions.

**Requirements for Correction:**

<u>Deficiency Type</u>	<u>Site Re-inspection</u>	<u>Cost of Re-inspection</u>	<u>Required Correction/Documentation</u>
Major Deficiencies:	Yes	Yes	
Minor Deficiencies:			

Water System Manager/

Person Present (please print)\*: \_\_\_\_\_ / Signature: \_\_\_\_\_ Date: \_\_\_\_\_

\*Requirements for correcting deficiencies by the required deadlines are still enforced even if there is a disagreement or a refusal to sign the inspection report. The health officer or their representatives reserves the right to require additional requirements at their discretion to protect public health and the environment. The inspection report findings and/or requirements may be appealed, please contact KCPHD for appeal procedures.

KCPHD Staff (please print)\*: \_\_\_\_\_ / Signature: \_\_\_\_\_ Date: \_\_\_\_\_

\*To the best of my knowledge and ability at this time, the aforementioned inspection findings are accurate. If any provision of this inspection report or its application to any person or circumstance is held invalid or unconstitutional, the remainder of this inspection report or the application of the provisions to other persons or circumstances is not affected.