

# SANITARY SURVEY UPDATE 2022

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# 2022 Sanitary Survey Background

## A Continues Improvement Audit by CDPHE

CDPHE Reg. 11 requires routine sanitary surveys for all public water systems, every three years.

- Onsite facility inspection of water treatment plants, potable water storage tanks and distribution systems and their records
- Survey confirmed strong record keeping practices across its water operations
- Survey found appropriate certifications for operators in charge at each water facility
- Survey found some infrastructure and record keeping deficiencies



# Sanitary Survey Findings

- 2 Violations – Tier II violations
  - City failed to implement a written plan from 2008 requiring a robust inspection and cleaning protocol.
  - City failed to comply with the back flow assembly testing requirements. The regulation was written with a phased approach and starting in 2022 the regulation required that all assemblies not tested in 2021 had to be tested by March 31, 2022. This means that 100% of all backflow assemblies must be tested compared to 90% in 2021.



# Sanitary Survey Resolutions – Significant Deficiencies

## Continuous Improvement in the Water System:

- 6 significant deficiencies were corrected during the sanitary survey and all hatches will be replaced to use the CDPHE preferred design.
- For the 7<sup>th</sup> significant deficiency, 2 sampling sites have been added to the sampling plan. The sites and accompanying map will be added to the City's sampling plan prior to the compliance date of December 3, 2022.



# Sanitary Survey Resolution of Violations

- Tier II Notification was mailed to all customers in the form of a bill stuffer or direct mail 2 days before the deadline of September 4, 2022.
- On September 9<sup>th</sup> , W&S submitted a Corrective Action Plan for CDPHE's approval. 10 days ahead of the compliance date of September 19, 2022.
  - Reservoirs 1 – 3 were taken out of service September 31, 2022, and are scheduled to be sealed off from the system by October 18, 2022. Both the inlets and outlets be sealed.



# Sanitary Survey Resolution of Violations

Backflow Program - 271 assemblies failed to meet testing/certification requirements

Assemblies	Count	Status
Residential Accounts mis-coded in Utility Billing	208	Corrected
Assemblies Tested Before 3/31/22 – not identified correctly in Backflow Software	14	Corrected
Violation Letters Sent	49	Completed
Certified tests to be received no later than October 17, 2022	43	In progress
Remaining assemblies to be tested	6	In progress

Note: Backflow testing only applies to commercial entities



# Sanitary Survey Resolution of Violations

Backflow assemblies are required to either show the:

- Test confirmation and associated report, or;
- Confirmation that service has been suspended, or;
- Confirmation the services are not commercial services, or;
- Documentation verifying that the cross-connection has been removed.

Tracking spreadsheet will be provided to CDPHE before the compliance deadline of December 3, 2022.



# Programmatic Changes - Backflow

Internal protocols have been changed to prevent this happening in the future.

- Notifications in bold red letters will be sent along with the standard letter to inform residents of testing requirements that all assemblies will need to be tested in the calendar year.
- Turn off/turn on fees will apply.
- Spanish educational material has been developed to distribute. Our key accounts person will visit commercial establishments to identify when this is needed.
- All lawn irrigation assemblies will be changed to May – July due dates to better align with the irrigation season.





# Greeley Water Response Summary

- ✓ All significant deficiencies have been corrected
- ✓ One violations has been corrected. The tanks are no longer in use and a corrective Action Plan was submitted to CDPHE. Public notice provided.
- Staff continue work to address the backflow testing and records violation:
  - 6 assemblies remaining.
  - A tracking sheet will be sent to CDPHE once all assemblies have been tested or inactivated.
- Operations and Engineering are working to cap off influent and effluent piping at Reservoir Rd. tanks 1-3 and will proceed with demolition of the reservoirs as time and budget allows.
- ✓ Engineering has submitted an application for a Sate Revolving Fund Loan to a replace one tank at 23<sup>rd</sup> Ave Reservoirs site. Funding could be in the form of a low interest loan and 49% grant.
  - Engineering is evaluating opportunities to re-use old liner material in non-potable pond applications, and evaluating the potential use of tank 1 for future non-potable storage at Reservoir Rd.

