

STATE OF UTAH
Capacity Development Program

Triennial Report
to the Governor of Utah
for Fiscal Years 2015 - 2017

In Compliance with the Requirements of
the Federal Safe Drinking Water Act

Section 1420(c)(3)

Utah Division of Drinking Water

Salt Lake City, UT

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Executive Summary

The 1996 Amendments to the Federal Safe Drinking Water Act (SDWA) added provisions for each state to develop a Capacity Development Program (CDP). The objective of the CDP is to enhance public health protection by helping water systems develop and maintain the capability. Systems with adequate technical, managerial and financial (TMF) capacity are able to maintain high rates of compliance with health-based standards.

Utah Division of Drinking Water Capacity Development program is actively helping to evaluate Public Water System (PWSs) technical, managerial, and financial capabilities and to assist these PWSs in improving their overall performance goal. The division has been showing considerable improvement in the current practices with the implementation of the Capacity Development program and the sanitary survey process. The Capacity Development program put every public water system (PWS) in the state on a triennial sanitary survey schedule. The sanitary survey process provides an evaluation of the systems' overall capabilities based on criteria developed by Division of Drinking Water in conjunction with the Local Health Department. The division's Capacity Development and Technical Assistance personnel provide support and guidance as needed where indicated by this evaluation.

The Capacity Development program has proven successful in its mission to improve the technical, managerial, and financial capabilities of small PWSs through the sanitary survey process and various methods of assistance including direct on-site assistance. Tracking of Notices of Violation (NOVs) to the water systems and the trend of NOVs issued over the period decreased by 60 percent from fiscal year 2014 to fiscal year 2017, which highlights the positive impact of the Capacity Development program. These trends indicate a better understanding of the Capacity Development program requirements and of the Safe Drinking Water Act in general as PWS operators and managers become better educated and more aware of pertinent issues.

The Capacity Development program, in conjunction with its partners and stakeholders, has amicably worked to identify ways of helping PWSs to address technical, managerial, and financial issues through innovative and improved methods of operation and management. Over seventy five percent of the 482 PWSs in the state serve communities with less than 10,000 people; over fifty-five percent serve communities with less than 3,300 – CDP has influenced them with par excellence. Capacity Development personnel continue to work on guidance documents and other tools for PWSs' use to improve performance, achieve compliance, and increase technical, managerial, and financial capacity.

1 INTRODUCTION

1.1 Triennial Program Report to the Governor and Annual Program Report to EPA

Every three years, EPA requires that the states submit State Capacity Development Program Reports to their Governors. The states are also required to make these reports available to the public.

Following the Office of Inspector General's Capacity Development Program Evaluation in 2003, EPA's Office of Water made a commitment to establish consistent reporting criteria for the required reports. Criteria were compiled to guide and assist the states in developing their annual program reports. The criteria are also intended to help EPA Regions maintain uniformity when assessing each State's implementation of its approved Capacity Development Program. The criteria also act as an aid to the states as they develop their triennial reports to their Governors.

1.2 Safe Drinking Water Act, State Primacy, and State Capitalization Grants

The Safe Drinking Water Act (SDWA) was established in 1974 with the intention of assuring safe drinking water in public water systems (PWS's) throughout the United States. SDWA authorized the Environmental Protection Agency (EPA) to delegate primary enforcement authority, or primacy, to any individual state deemed sufficiently capable to administer its state program of Public Water System Supervision (PWSS). Utah was granted primacy on February 28, 1980.

The initial federal monies under SDWA from EPA to the states aided the states in regulation of PWS's with respect to EPA-promulgated maximum contaminant levels (MCL's). Minor amendments to SDWA in 1977, 1979, and 1980, and major amendments in 1986 and 1996 expanded federal focus from the original chemical contaminants of interest to additional concerns with drinking water. The 1986 Amendments focused on disease-causing microbial contaminants in drinking water and established minimum treatment requirements for all surface waters. They also encouraged EPA to quicken the pace of MCL promulgation by specific direction to EPA to establish MCL's and MCLG's (maximum contaminant level goals) for 83 specific contaminants including synthetic chemical contaminants of ground water. The 1986 Amendments also addressed lead and copper contamination in drinking water at the consumer's tap, principally as a result of distribution system and fixture corrosion.

The 1996 Amendments implemented stronger prevention programs, empowered the states with greater flexibility, afforded consumers access to better information ("right to know") in consistent format (Consumer Confidence Reports), and overhauled EPA's regulatory development process including how many and which contaminants are to be selected for regulation. The 1996 Amendments redirected drinking water contamination prevention efforts to the new programs of source water protection, capacity development, and operator certification. The 1996 Amendments also establish federal funding for states and their PWS's through the Drinking Water State Revolving Fund (DWSRF). The DWSRF assists communities in drinking water treatment and protection in much the same way that wastewater treatment and clean water have been promoted through the Clean Water State Revolving Fund (CWSRF).

The 1996 Amendments to SDWA allow the option of designation of portions of a state's grant monies as *set-aside funds* for specific priority activities and other administrative requirements. As much as 10 percent of a state's capitalization grant may be used for implementation of source water protection, capacity development, and operator certification programs, as well as for the state's overall drinking water program [§1452(g)]. Up to 15 percent (no more than 10 percent for any one purpose) can be used for prevention projects in water systems, including source water protection loans, technical and financial assistance to systems as part of a state capacity development strategy, source water assessments, and wellhead protection [§1452(k)].

The 1996 Amendments to SDWA make it incumbent upon the states to adopt program modifications and additions prescribed by EPA. EPA designates these program requirements for the states as either *mandatory* or *voluntary*. Failure of a state to enact a *mandated* program by the allotted deadline can result in state forfeiture of *primacy* for its own Public Water System Supervision (PWSS) program and loss of the entire program capitalization grant. Failure to enact a *voluntary* program calls for loss of only a portion of the program capitalization grant, typically 20 percent.

Utah and the other states regularly reconcile available resources to EPA compliance deadlines for both *mandatory* and *voluntary* programs. The states' PWSS programs in FY17 continued to attend to multiple EPA Rule initiatives including Long-Term 2 Enhanced Surface Water Treatment Rule, Ground Water Rule, and Total Coliform Rule.

1.3 State-Level Capacity Development Programs

In the time leading up to the 1996 Amendments to SDWA, EPA became aware of demonstrated success in several states in reliably delivering safe drinking water. These states had each focused on improvements in the technical, managerial, and financial capabilities of their PWS's. The 1996 Amendments represent EPA's efforts to build nationally on this demonstrated success by imposing certain mandates on the states. Namely, in order to receive the full allotment of funds to which they are entitled under the DWSRF, states have had to develop:

1. A program to ensure that all new community and new non-transient, non-community water systems commencing operation after October 1, 1999, demonstrate sufficient technical, managerial, and financial capacity to comply with national primary drinking water regulations (NPDWR's); and,
2. A strategy to assist existing PWS's in acquiring and maintaining technical, managerial, and financial capacity to comply with SDWA requirements.

EPA's intent is that the states use DWSRF set-aside funds for their capacity development program and implementation efforts. As intended by the 1996 SDWA Amendments, "capacity" encompasses the technical, managerial, and financial capabilities of a water system to achieve, maintain, and plan for compliance with applicable drinking water standards given the available water resources and the characteristics of the population served by the water system.

Technical capacity refers to the physical infrastructure of the water system, including but not limited to the adequacy of source water, infrastructure adequacy (source, treatment, storage, and distribution), and the ability of system personnel to implement the requisite technical knowledge. *Managerial capacity* refers to the management matrix of the water system, including but not limited to ownership accountability, staffing and organization, and effective external linkages. *Financial capacity* refers to the financial resources of the water system, including but not limited to the revenue sufficiency, credit worthiness, and fiscal management and controls.

Failure to meet the requirements of the provisions for Capacity Development published by EPA subjects a state to a 20 percent withholding from its DWSRF allotment. In the several years since the 1996 Amendments, most states have identified and prioritized PWS's most in need of assistance in enhancing their technical, managerial, and financial

capacity. In addition, the states (including Utah) have for a number of years been targeting deficient PWS's for technical and financial assistance.

The 1996 SDWA Amendments directed EPA to provide guidance to the states in establishing their capacity development programs. The following documents were published to meet this requirement.

- *Information for States on Implementing the Capacity Development Provisions of the Safe Drinking Water Act Amendments of 1996.* 1998. U.S. Govt. Pub. EPA 816-R-98-008.
- *Handbook for Capacity Development: Developing Water System Capacity Under the Safe Drinking Water Act as Amended in 1996.* 1999. U.S. Govt. Pub. EPA 816-R-99-012
- *Developing Water System Managerial Capacity: Training Module.* 2002. Drinking Water Academy and Environmental Protection Agency.

Capacity Development is intended to be a commitment by the states on behalf of their PWS's to (i) protect public health by ensuring consistent compliance with drinking water standards, including federal and State regulations and other applicable standards of performance; (ii) enhance performance beyond compliance through measures that bring about efficiency, effectiveness, and service excellence; and (iii) promote continuous improvement through monitoring, assessment, and strategic planning. EPA's policy position is that all water systems, regardless of size or other characteristics, can benefit from a program of ongoing capability development. Capable water systems are better positioned to consistently comply with applicable standards and provide customers with safe and reliable water service. Furthermore, capable systems also are better positioned to meet other standards of performance that are generally accepted in the industry or required by other regulatory agencies – e.g., the aesthetic quality of water (taste, color, and odor), water pressure, water loss minimization, or other measurable aspects of performance.

2 UTAH'S CAPACITY DEVELOPMENT PROGRAM

2.1 Rule Promulgation

2.1.1 Authority

In Utah, the Drinking Water Board operates under authority granted in 1981 by Section 19-4-104 of the Utah Safe Drinking Water Act. The Utah Drinking Water Board is an 9-person board appointed by the Governor. The Board is empowered to adopt rules governing the design, operation, and maintenance of Utah's public drinking water systems. The Utah Capacity Development Program is codified in Utah Administrative Code *Rule 309-800 Capacity Development Program*.

2.1.2 Most Recent Reporting Period

In FY 2017 The Division of Drinking Water did not implement any changes to *R309-800 Capacity Development Program*.

2.2 Range of Program and Activities

2.2.1 Allocation of Budget Resources

The State of Utah allocates money to a specific Capacity Development set-aside fund in accordance with SDWA program guidelines. The State's fiscal year begins each calendar year on July 1st and ends on June 30 of the following calendar year. The Division of Drinking Water began FY17 with \$ 18,087 in the Capacity Development set-aside fund (Unit Code 3823). During the year \$13,698 was charged against this fund. An amount of \$10,000 was requested for this set-aside. The Division should have \$14,389 for Capacity Development oversight for FY18.

2.2.2 Drinking Water State Revolving Fund (DWSRF)

The Utah Capacity Development Program's principal activity is in support of the federal and State Drinking Water SRF programs. For Fiscal Year 2017, the State of Utah Drinking Water Board authorized funding for 26 projects through the SRF programs. Projects authorized in FY 2017 were approximately \$ 21,261,273 of which \$ 18,711,273 was allocated from the federal SRF program and \$ 2,510,000 was allocated from the State SRF program.

From the pool of authorized projects, Division Staff closed loans to complete the funding process for 24 projects totaling approximately \$ 8,212,874 of which \$5,103,874 was committed from the federal SRF program and \$3,109,000 was committed from the State SRF program.

2.2.3 System Consolidation and Restructuring

The Division continued work on its initiative to work closely with local and county planners and the Division of Public Utilities to develop regulatory guidelines and a cooperative environment whereby new developments are not approved for construction without the appropriate review and approval of the drinking water system. Counties continue to investigate adopting ordinances and developing a relationship with the Division of Drinking Water to assure that new development or proposed new water systems receive Division approval prior to county plat approval.

2.2.4 Training Efforts Fiscal Year 2017

A portion of Utah's Capacity Development Program fund is allocated to drinking water system operator education and certification. SDWIS records for the State of Utah report 482 community water systems and 71 non-transient non-community water systems during FY17. Of these systems, 38 community and 5 non-transient non-community systems are reportedly lacking a certified operator. Collaboration between State Division of Drinking Water staff with the Intermountain Section of the American Water Works Association and the Rural Water Association of Utah to provide operator training resources, including pre-certification training, is an ongoing effort to assure that all water systems in the state of Utah have access to certified personnel.

Utah had 2449 certified operators in FY17. Operator Certification records show that 467 written examinations were administered in Utah for all levels of distribution and treatment operators during FY17. Water distribution is the more common certification and accounts for approximately 77 percent of the total number of operator certificates in the State of Utah.

In addition to water system operator training and certification, the Division of Drinking Water also provides funding (through DWSRF set-aside funds) for

training and certification for backflow technicians. Division records indicate there are 771 certified backflow technicians in the State of Utah and that 344 written examinations were administered during FY17.

2.3 State Capacity Development Program for New Water Systems

2.3.1 Background

The State of Utah's present day efforts in capacity development have their roots in the area of system viability, namely *Rule R309-500-11 Financial Viability*, which became effective in 1998 and encouraged system owners and managers to develop strategies to recoup the costs of constructing, operating and maintaining their systems. The rule suggested that capital and operating cost data and/or estimates be submitted to the Division of Drinking Water for review at the same time that engineering plans and specifications are submitted for approval.

The Rule was well-intentioned but lacked a regulatory framework for adequate enforcement and was replaced in 1999 by *R309-352 Capacity Development Program*. This rule was renumbered to R309-800 during this fiscal year 2011 to conform with the new rule numbering convention adopted by the Division of Drinking Water.

Congress recognized this same circumstance on a national scale and the 1996 SDWA Amendments enacted a provision to move the states to action, namely that the states must have the legal authority to ensure the technical, managerial, and financial capabilities of new water systems or risk losing up to 20 percent of their annual DWSRF capitalization grant.

At the state level, Utah Code 19-4-104(1)(a)(v) was promulgated and specifically grants authority to the Drinking Water Board to make rules regarding the Capacity Development Program and it references SDWA Section 1420. Utah's resulting Capacity Development Program Rule requires that new water systems demonstrate they have adequate technical, managerial, and financial capacity before they may be approved as a public water system (PWS). With its adoption, and established effective date of September 15, 1999, *Rule R309-352 Capacity Development Program* requires both new community and new non-transient non-community water systems to submit a Capacity Assessment Review, which is to include a Project Notification Form and a Business Plan (which is to consist of a Facility Plan, a Management Plan, and a Financial Plan).

The Facility Plan is intended to provide a description of the scope of the water services that will be provided by the proposed community or non-transient non-community water system and must include:

1. A description of the nature and extent of the area to be served and provisions for extending the water supply system to meet growth;
2. An assessment of current and expected drinking water compliance based on monitoring data from the proposed water source;
3. A description of the alternatives considered, including interconnections with other existing water systems, and the technical, managerial, financial, and operational reasons for the approach selected; and,
4. An engineering description of the facilities to be constructed, including the construction phases and future phases as well as future plans for expansion and an estimate of the full cost of any required construction, operation, and maintenance.

The Management Plan is intended to describe how the proposed community or non-transient non-community water system will provide effective system management and operation. It must include:

1. Documentation that the applicant has water rights, and the legal right and authority to construct, operate, and maintain the system;
2. An Operating Plan that describes the tasks to be performed in managing and operating the system including administrative and management organization charts, plans for staffing the system with certified operators, and provisions for an operations and maintenance manual; and,
3. Documentation of management credentials of operations personnel and documentation of cooperative agreements or service contracts including demonstration of compliance with the water system operator certification rule.

The Financial Plan is intended to describe the proposed community or nontransient noncommunity water system's revenues, cash flow, income, and debt (issuing and repayment) for meeting the costs of construction as well as the costs of operation and maintenance for five years from the date the applicant expects to

begin system operation.

After the Division deems that the information submitted by the applicant is complete, the Division conducts a Capacity Assessment Review. The applicant is notified in writing whether or not the proposed new system has met the Rule requirements for technical, managerial, and financial capacity. *R309-800 Capacity Development Program* stipulates that no new community water system, nor non-transient non-community water system, shall be approved in the absence of demonstrated adequate capacity.

2.3.2 Most Recent Reporting Period

In any given fiscal year, the Division of Drinking Water receives numerous inquiries from developers, landowners, and other entities about creation of new public water systems. In such inquiries, the Division promotes alternatives such as consolidation with, or annexation by, existing public water systems where such alternatives are available. *R309-800 Capacity Development Program* is written in straightforward language and the Division refers those individuals proposing the new water system to this Rule to acquaint them with the tasks involved in creating a new water system.

In an average year 5-10 new water systems are proposed, about half of which are new community or new non-transient non-community water systems that are subject to the requirements of *R309-800 Capacity Development Program*. Staff typically responds to the initial inquiry and capacity assessment within 30 days.

2.4 State Capacity Development Program for Existing Water Systems

2.4.1 Background

Congress, in the 1996 SDWA Amendments, worked from the premise that enhancing and ensuring the technical, managerial, and financial capabilities of small water systems is the best strategy for correcting and preventing noncompliance with public drinking water system requirements. To this end, penalties for not implementing strategies “to assist public water systems in acquiring and maintaining technical, managerial, and financial capacity” (SDWA Sec. 1420(c)) were included in the legislation to prompt states to adhere to this philosophy.

Utah implemented the wishes of Congress on several regulatory fronts. The *State of Utah Administrative Rules for Public Drinking Water Systems Rule 309-705, Financial Assistance: Federal Drinking Water Project Revolving Loan Program*, has several components that interface with issues of system capacity and systems with histories of significant noncompliance. The purpose of *Rule 309-705, Financial Assistance: Federal Drinking Water Project Revolving Loan Program* is to establish criteria for financial assistance to public drinking water systems in accordance with a federal grant established under 42 U.S.C. 300j *et seq.*, federal Safe Drinking Water Act. The Rule defines an *eligible water system* as any community drinking water system, either privately or publicly owned, and nonprofit noncommunity water systems.

Historically, State financial assistance through *Rule 309-705* has been sought by water systems across the entire compliance spectrum from those systems with significant compliance issues to those with few if any compliance issues. An important stipulation of *Rule 309-705-4(3)(a)* is that no financial assistance is authorized for any project for a water system in significant noncompliance, as measured by a *not approved* rating, unless the project will resolve all outstanding issues causing the noncompliance. *Rule 309-705-5(3)* further requires that as part of the application and project initiation procedures, Division staff will prepare a capacity development analysis (i.e., capacity assessment) of the applicant water system. Thus, the elements of the State's Capacity Development Program for new community water systems and nontransient noncommunity (NTNC) water systems (see Section 2.3, State Capacity Development Program for New Systems) can be used in the analysis of existing water systems.

2.4.2 Most Recent Reporting Period

During FY17, staff completed Capacity Assessments, according to the procedures outlined in *R309-800 Capacity Development Program*, for the following DWSRF applicants:

Winchester Hill W System
Big Plains Water & Sewer SSD
San Juan Spanish Valley SSD
Bridge Hollow Water System
Rocky Ridge

Fairfield Culinary Water System
Virgin Town Water System
Cedarview Montwell
Hanksville Town Water System
Lizard Bench Water Association
Iron Town Water System
Big Water Town
Community Water Company
Koosharem Town
Holmstead Ranch LLC W System
North Valley Ranch W System
Pleasant View W System
Manila Town W System
Mendon City W System

Capacity assessments for these applicants were conducted according to the procedures outlined in *R309-800 Capacity Development Program*. A capacity assessment report was prepared and submitted to the water system and a copy was placed in each applicant's project folder.

3 STATE APPROACH TO IDENTIFIED NEEDS AND CONCERNS

3.1 Improvement Priority System (IPS)

3.1.1 Program Description

The State of Utah employs a system for assessing deficiency points against public water systems on the basis not only of the monitoring and reporting shortcomings addressed in the *EPA Enforcement Targeting Tool (ETT)* but also a spectrum of other public health concerns. EPA replaced the Significant Non Compliance (SNC) List with the ETT in 2010. According to information in the quarterly ETT list submitted to the states: "The purpose of the Enforcement Targeting Tool is to prioritize public water systems for enforcement response. It assigns points for each unaddressed violation at a PWS during the last 5 years, which are added to create a total score for each PWS."

Utah public drinking water systems are subject to additional observation and compliance monitoring than that included on the EPA ETT list alone. The program is authorized under *State of Utah Administrative Rules for Public Drinking Water Systems Rule 309-400, Improvement Priority System Rule*, which enumerates Improvement Priority System (IPS) deficiency points for administrative violations, infrastructure construction irregularities, unauthorized water source or other infrastructure use, and other practices that are inconsistent with delivery of safe drinking water to public drinking water system users.

IPS points are assigned as a result of deficiencies identified during water system inspections (i.e., sanitary surveys), for failure to comply with monitoring and reporting requirements and are typically assigned as soon as the deviations from these requirements are noted in the State's data base, or for failure to follow design and construction rules (such as using an unapproved source, failure to follow plan approval procedures, or failure to obtain an operating permit). *Rule 309-400* requires that a community water system that is assessed more than 150 deficiency points be classified by the Utah Division of Drinking Water as "*Not Approved.*"

3.2 Utah Top 25 Significant Noncompliance (SNC) List

3.2.1 Origin of the List

The State of Utah has developed a list of systems with a history of significant noncompliance in monitoring and reporting as well as physical system deficiencies in anticipation of using the list as compliance tools. Four times per year, the State develops a *Utah Top [Worst] 25 Significant Noncompliance (SNC) List*. This list is generated before regularly scheduled, quarterly meetings, and is a tabulation of the worst 25 scores of all public water system *IPS* scores (i.e., those water systems with the highest point totals). This list supplements the *EPA ETT List*.

It is not unusual for Utah water systems with severe technical, managerial, and financial challenges to regularly and repeatedly appear on this list. In contrast, water systems that achieves and maintains sufficient technical, managerial, and financial capabilities rarely appear on the list for more than one quarter. An isolated incident, such as failure to complete the design approval process correctly for new water system infrastructure, or failure to take scheduled water samples,

occasionally occurs among even the most capable water systems but is generally resolved as soon as the problem is brought to the attention of a technically, managerially, and financially capable public water system.

3.2.2 Most Recent Reporting Period

For Fiscal Year 2017, Utah Compliance Assurance Program (CAP) quarterly meetings were held in August, November, February, and May. Meetings are normally held within 45 days of the end of the previous quarter.

3.3 Utah Rating Change List

3.3.1 Origin of the List

The utility of the *Utah Top [Worst] 25 SNC List* has been supplemented by the State's generation of an additional quarterly list entitled the *Utah [Water System] Rating Change List*. This list identifies water systems whose IPS scores have fallen below (a good development) or exceeded (a bad development) the critical 150 IPS point threshold between "Approved" and "Not Approved" status. This list thus serves as a convenient method to identify on a quarterly basis those systems that either merit a return to "Approved" status or warrant a change to "Not Approved" status relative to their previous quarter's status.

3.3.2 Most Recent Reporting Period

In any given fiscal year, the four Utah quarterly CAP meetings have the primary purpose of addressing the *EPA ETT List* and the *Utah Top [Worst] 25 Significant Noncompliance (SNC) List*. A secondary function of the quarterly meetings is serving as a forum for discussion of public water systems whose ratings warranted change from *approved* or *not approved*. In each case, the meeting's findings are officially sent to the affected water systems.

3.4 Review of Implementation of the Program

The Division of Drinking Water does not conduct regularly scheduled reviews of the implementation of its Capacity Development Program. There is a great deal of flexibility in program administration under *Rule R309-800 Capacity Development Program* and program implementation evolves in response to water system applicant (new systems) and operator (existing systems) feedback.

During the previous three years fourteen new public water systems were identified or organized in the State of Utah. These systems are detailed in the table below.

PWSID	PWS Name	EPA Region	State	PWS Type	Retail Population Served	
UTAH08048	Lila Canyon Mine	8	UT	NTNC	300	FY17
UTAH18177	Utah Data Center	8	UT	C	250	FY17
UTAH25179	Rigtrup Egg Farm	8	UT	NTNC	35	FY17
UTAH27106	Holmstead Ranch Llc	8	UT	NTNC	100	FY16
UTAH27086	North Valley Ranches Sub	8	UT	C	30	FY16
UTAH27088	Olympus Academy	8	UT	C	84	FY15
UTAH06008	Weber Basin Job Corps	8	UT	C	305	FY16
UTAH15043	Houwelings Tomato Plant	8	UT	NTNC	50	FY16
UTAH06047	Mida - Falcon Hill (Hafb)	8	UT	NTNC	55	FY16
UTAH25077	Riverbend Grove, Inc.	8	UT	NTNC	35	FY15
UTAH27104	Snow Canyon State Park	8	UT	NTNC	266	FY14
UTAH28028	Caineville SSD	8	UT	C	83	FY14
UTAH27105	Camp Kolob- Oak V Girls Camp	8	UT	NTNC	300	FY14
UTAH11094	Beryl Baptist Church	8	UT	NTNC	40	FY15
UTAH18173	VA Medical Center SLC	8	UT	C	5550	FY15
UTAH25178	Krishna Temple	8	UT	NTNC	50	FY15
UTAH02080	Washakie Renewal Energy	8	UT	NTNC	45	FY15
UTAH02079	Bear River WCD- Collinston Water	8	UT	C	102	FY15
UTAH22148	Weber River Rec Camp	8	UT	NTNC	150	FY15

According to July 2017 ETT list; these are the projects which show the violations with their ETT score. Pinnacle Homeowners Association has TCR violation of 13. Shooting Star RV Resort and Frandsen Scout Reservation has TCR violation of 11. Susent Park has violation of TCR, nitrates and VOC violation at point 12. Systems in violation of Nitrates above ETT points 11 are Heber City Kingdom Hall and Lucerne Valley Campground.

3.5 Modifications to the Program Strategy

There were no major modifications to the program strategy during recent reporting years.

3.6 Availability of the Report to the Public

The Division of Drinking Water posts its annual Capacity Development Program Report to EPA and its Triennial Capacity Development Report to the Governor on its web site at:

<https://deq.utah.gov/ProgramsServices/programs/water/capacitydevelopment/index.htm>