



Reworking the Drinking Water System Rating Process

As a critical stakeholder, we wanted to make you aware of the changes we are considering to the water system rating process and to solicit your insight and concerns **PRIOR TO OFFICIAL PUBLIC COMMENT** so that the resulting rule change we put on the table for public consideration is the best possible proposal.

Background:

- At the time the Improvement Priority System (R309-400) – or IPS Rule – was originally adopted, it was an innovative approach to evaluating water systems. In fact, the EPA based its ETT water rating system on the Utah model.
- Decades later, it's time to take a hard look at the IPS Rule in its entirety. The overall ideal continues to work very well for Utah; the challenge is that issue-focused amendments have resulted in a long and complicated rule.

Objective:

- Simply, we want to make the existing process better. The Division of Drinking Water is seeking to:
 - Align point values and ensure that risk to public health is the driver
 - Address the possibility that credits mask deficiencies
 - Prompt action by systems who were previously okay with carrying points
 - Check alignment with the Federal rating process so that Utah water systems don't end up on EPA's radar before DDW has had a chance to work with them.
 - Streamline and simplify. The Point Values for various deficiencies and violations are being grouped, clearly explained, and placed in a reference table format.

Proposed Point Framework:

- The proposed point framework is:
 - Low Health Risk - 5 pts
 - Minor potential to cause harm - 15 points
 - Moderate potential to cause harm; harm becomes worse if not addressed - 25 points
 - Significant potential to cause harm - 50 points
 - Monitoring Violations – 100 points
 - Imminent health threat (automatic not approved status) - 200 Points

Our Request and Timeline

- The stakeholder process is critical to us. We want to hear your thoughts and concerns over the next few months and adjust the concept, where needed. Please send comments by **September 17, 2018**. By February, we intend to be able to show you specifically what a change in the IPS Rule could mean to your water system and to address any remaining concerns that you see that we didn't.
- We hope to take the resulting draft rule to the Drinking Water Board in April, 2019 and then to send it out to public comment.
- The overall goal is to be able to implement the new IPS Rule by the January, 2020 sanitary survey season.

Questions? Jennifer Yee 801-536-4216 or ddwips@utah.gov