

# The Proposed IPS Rule and the IPS2020 Report Frequently Asked Questions

The Division of Drinking Water (DDW) is working on revising the R309-400 rule (the Improvement Priority System or IPS rule) with an anticipated implementation date starting January 1, 2020.

The IPS rule was first finalized in 1996 as a tool for water systems to track compliance with violations and physical deficiencies. It helps systems understand the severity of any issues and maintain compliance. Water system operators can check the status of the IPS points for their system by going to [waterlink.utah.gov](http://waterlink.utah.gov), selecting the system and selecting IPS Report.

The IPS2020 report shows the hypothetical total IPS points for water systems beginning January 1, 2020, based on each water system's current deficiencies, water quality violations, failure to monitor violations, and failure to report violations. The DDW plans to actively reach out to and assist water systems to correct as many deficiencies as possible within 2019.

The IPS2020 report is a tool that the water systems can use to prioritize the deficiencies to be corrected, and to prepare for the updated IPS rule.

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## Why is IPS changing?

- \* The IPS rule has not been completely reviewed since 1996.
- \* The IPS rule is unique to Utah. The revisions to IPS will allow the final system priority position to align better with EPA's enforcement tracking and health risks.
- \* The new IPS rule cleans up deficiencies that were duplicates and clarifies issues for each facility.
- \* The revisions remove the possibility that credit points mask deficiencies.
- \* The revisions remove the possibility that pathways for contamination across many facilities are reduced by only assigned the points once. Currently, the priority to fix these significant deficiencies is minimized.



## When will this start?

- \* DDW welcomes your early feedback on the revisions to the IPS rule between now and mid-March 2019. To provide comments to the Division during the rule change process go to [ips.utah.gov](http://ips.utah.gov).
- \* Official rulemaking process will begin in April 2019.
- \* Rule change is anticipated to become final in June 2019.
- \* Implementation starts January 1, 2020.

## Why did my system's IPS points change?

- \* Points are now organized by facility instead of deficiency.
- \* Significant deficiencies are now all at least 25 points.
- \* Deficiencies identified in multiple facilities are counted separately.
- \* To see the list of new point values for all violations and deficiencies go to [ips.utah.gov](http://ips.utah.gov).

## My system's IPS points went up, what can I do?

- \* Address and correct the identified deficiencies as soon as possible.
- \* Make sure the violations and deficiencies are correct according to your system's records.
- \* Send in any IPS corrections to [ddwips@utah.gov](mailto:ddwips@utah.gov).

- \* If your system needs an extension in time to fix a significant deficiency, go to [requestcap.utah.gov](http://requestcap.utah.gov). The CAP is a Compliance Action Plan that extends the timeframe for fixing a deficiency. Once the fix deadline (no longer than 120 days after the discovery of the deficiency) has passed the CAP is no longer an option.
- \* If your system has an alternate way of meeting a specific construction standard which protects public health, the system will need to request an exception, contact Nathan Lunstad at [nlunstad@utah.gov](mailto:nlunstad@utah.gov) or 385-239-5974 for details and conditions.

## Who can help me?

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| <ul style="list-style-type: none"> <li>* <b>Physical Facility Points</b><br/>Jennifer Yee<br/><a href="mailto:ddwips@utah.gov">ddwips@utah.gov</a><br/>801-536-4216</li> </ul>   | <ul style="list-style-type: none"> <li>* <b>Chemical Rule Violations</b><br/>Emily Frary<br/><a href="mailto:emilyfrary@utah.gov">emilyfrary@utah.gov</a><br/>801-536-0070</li> </ul> | <ul style="list-style-type: none"> <li>* <b>Consumer Confidence Report</b><br/>Brandi Smith<br/><a href="mailto:brandismith@utah.gov">brandismith@utah.gov</a><br/>801-536-4210</li> </ul> |
| <ul style="list-style-type: none"> <li>* <b>Cross Connection Points</b><br/>Gary Rager<br/><a href="mailto:grager@utah.gov">grager@utah.gov</a><br/>801-536-4498</li> </ul>  | <ul style="list-style-type: none"> <li>* <b>Microbial Rule Violations</b><br/>Janet Lee<br/><a href="mailto:jjlee@utah.gov">jjlee@utah.gov</a><br/>801-536-0088</li> </ul>            | <ul style="list-style-type: none"> <li>* <b>Surface Water Treatment</b><br/>Michelle Deras<br/><a href="mailto:mderas@utah.gov">mderas@utah.gov</a><br/>801-536-4265</li> </ul>            |
| <ul style="list-style-type: none"> <li>* <b>Treatment Technique Violations (failure to fix a significant deficiency)</b><br/>Jennifer Yee<br/><a href="mailto:ddwips@utah.gov">ddwips@utah.gov</a><br/>801-536-4216</li> </ul> | <ul style="list-style-type: none"> <li>* <b>Microbial Rule Violation (Code 36)</b><br/>Randi Ryan<br/><a href="mailto:rryan@utah.gov">rryan@utah.gov</a><br/>801-536-4170</li> </ul>  | <ul style="list-style-type: none"> <li>* <b>Exception to DDW rules</b><br/>Nathan Lunstad<br/><a href="mailto:nlunstad@utah.gov">nlunstad@utah.gov</a><br/>385-239-5974</li> </ul>         |
| <ul style="list-style-type: none"> <li>* <b>Lead &amp; Copper Violations</b><br/>Matt Wycoff<br/><a href="mailto:mwycoff@utah.gov">mwycoff@utah.gov</a><br/>801-536-0063</li> </ul>  | <ul style="list-style-type: none"> <li>* <b>Source Protection Points</b><br/>Deidre Beck<br/><a href="mailto:dbeck@utah.gov">dbeck@utah.gov</a><br/>801-536-4201</li> </ul>           |  |

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## Helpful Links and Such

- \* Keep updated on the IPS rule change  
[ips.utah.gov](http://ips.utah.gov)
- \* Request a Corrective Action Plan (CAP)  
[requestcap.utah.gov](http://requestcap.utah.gov)
- \* Submit a seasonal start-up  
[seasonalstartup.utah.gov](http://seasonalstartup.utah.gov)
- \* Webinar about IPS rule change  
[youtube.com/watch?v=tUTNSwQILtU](https://youtube.com/watch?v=tUTNSwQILtU)