

Capacity Development Implementation Report to the US Environmental Protection Agency

State Fiscal Year 2021



State of Idaho
Department of Environmental Quality



September 2021

Prepared by

Barbara J Jones
Idaho Department of Environmental Quality
1410 N Hilton
Boise, Idaho 83706



Printed on recycled paper, DEQ September 2021, PID WTR, DWPA.DWCD, CA 82096. Costs associated with this publication are available from the State of Idaho Department of Environmental Quality in accordance with Idaho Code § 60-202.

Table of Contents

1	Introduction.....	v
2	New Systems Program Annual Reporting Criteria	1
	Engineering Assistance	3
	Technical Assistance	3
3	Existing Systems Strategy	3
	Technical and Compliance Assistance	4
	Public Water System Switchboard.....	5
	Additional Assistance	7
	Grants and Loans	7
	Engineering Review for Existing Systems	8
	Sanitary Surveys.....	9
	Sanitary Survey Procedures.....	9
	Online Sanitary Survey Inspection Form	9
	Preliminary Inspection Findings Form	10
	Sanitary Survey Significant Deficiency Tracking	10
	Enforcement Tracking Tool.....	10
4	Capacity Assistance.....	11
	Additional Training and Workshop Opportunities	12

List of Tables

Table 1: New Community and Non-Transient Non-Community public water systems for SFY 7/1/2020 – 6/30/2021.....	1
Table 2: ETT History for Community and Non-Transient Non-Community active public water systems established during SFYs 2018 – 2019, 2019 – 2020, 2020 - 2021	2

Abbreviations, Acronyms, and Symbols

DEQ	Idaho Department of Environmental Quality
EPA	US Environmental Protection Agency
CCR	Consumer Confidence Report
DEQ	Idaho Department of Environmental Quality
DWSRF	Drinking Water State Revolving Fund
EPA	US Environmental Protection Agency
MCL	Maximum Contaminant Level
PWS	Public Water System
RTCR	Revised Total Coliform Rule
TFM	Technical, Financial, and Managerial

1 Introduction

The Idaho Department of Environmental Quality's (DEQ's) Drinking Water Bureau implements the state's capacity development program. The following annual capacity development implementation report describes capacity development efforts during state fiscal year 2021 (July 1, 2020–June 30, 2021). This report contains the required United States Environmental Protection Agency (EPA) reporting elements for the annual state capacity development program implementation report.

Capacity development program accomplishments are funded with set-aside monies from the EPA Capitalization Grant of the Drinking Water State Revolving Fund.

Infrastructure assets, reliability in operation, management, and cost-effective long term sustainability require a sustained and collaborative technical assistance effort. DEQ is responsible for implementing the state's drinking water capacity development strategy. In 1998, the DEQ Director appointed the Drinking Water Advisory Committee to determine the status of Idaho's public water systems (PWSs) and to make recommendations for improving system capacity to deliver safe drinking water to Idaho citizens. In 1999, the Drinking Water Advisory Committee issued a report listing its findings and recommendations, which helped to establish the state's capacity development strategy.¹ The report of findings is available upon request. As a result of the Drinking Water Advisory Committee findings, DEQ published *A Strategy for Improving the Financial, Technical, and Managerial Capacity of Idaho's Public Drinking Water Systems* in July 2000, which guides the state's capacity development program. Capacity development is recognized as being a key component of the State's core drinking water program and assistance is available to any water system that has a need and is willing to work with DEQ or its partners in achieving compliance.

The COVID-19 pandemic posed a unique challenge for the regulating agencies as well as the public drinking water systems. Face-to-face communications through sanitary surveys, compliance conferences, and site visits were significantly reduced. Efforts were directed towards web-based resources, zoom trainings and meetings, and phone and email communication.

Idaho's Capacity Development Strategy is being revised and updated to include a description of how asset management will be promoted as per the requirements of America's Water Infrastructure Act. The strategy is intended to meet regulatory requirements of the Safe Drinking Water Act while providing a flexible framework to enhance public health protection, provide accountability, and assist water system personnel with targeted assistance.

¹ *Report of Findings: On Improving the Technical, Financial, and Managerial Capacity of Idaho's Public Water Systems*, Drinking Water Citizens Advisory Committee to the Idaho Department of Environmental Quality, September 1998. EDMS Record Number 2018ABI28.

2 New Systems Program Annual Reporting Criteria

1. Has the State's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year? If so, please explain and identify how this has affected or impacted the implementation of the New Systems Program (additional documentation, such as an Attorney General (AG) statement or a statement from a delegated department attorney, may be required.) If not, no additional information about legal authority is necessary.

Idaho's legal authority to implement the New Systems Program has not changed. Idaho Code Section §39-118, requires that prior to constructing, extending, installing or operating a public a public water system; plans must be submitted to the Department and approved in writing. The "Idaho Rules for Public Drinking Water Systems," IDAPA 58.01.08.500 addresses capacity requirements for public water systems.

2. Have the state's control points ever been modified? If so, describe the modifications and any impacts these modifications have had on implementation of the New Systems Program. If not, no additional information on control points is necessary.

The State's control points have not been modified.

3. List new systems (PWS ID and name) established in the state within the past three years and indicate whether those systems have been on the enforcement targeting tool (ETT) list during their first three years of operation.

Five new public water systems (Community (C) or Non-Transient Non-Community (NTNC)) were added to Idaho's public water system inventory during the reporting period. See Table 1.

Table 1: New Community and Non-Transient Non-Community public water systems for SFY 7/1/2020 – 6/30/2021

PWS ID	NAME	System Type	ACTIVITY DATE
ID7100226	THE CENTRE AT RAINY CREEK	C	10/30/2020
ID3140276	FLAMINGO WEST	NTNC	4/29/2021
ID3440037	INTRINSIC ORGANICS	NTNC	12/18/2020
ID1090295	LODGE HAVEN RANCH	C	5/19/2021
ID3140277	LOLYS DAYCARE	NTNC	5/25/2021

Based on the violation score list on the Enforcement Tracking Tool (ETT) list, only one water system added to Idaho's inventory in the last three reporting periods received a system score of 11 or higher during the first three years of operation. Table 2 lists the ETT history for these 26 systems.

Table 2: ETT History for Community and Non-Transient Non-Community active public water systems established during SFYs 2018 – 2019, 2019 – 2020, 2020 - 2021

PWS ID	NAME	System Type	ETT History
ID5420108	BETASEED INC	NTNC	NO
ID7100226	THE CENTER AT RAINY CREEK	C	NO
ID5420110	CHOBANI	NTNC	NO
ID5270036	CHRISTINAS DAYCARE	NTNC	NO
ID3370044	DERUYTERS DAIRY HOUSING	NTNC	NO
ID4010266	DRY CREEK RANCH SUBDIVISION	C	NO
ID4430114	ELK CREEK CHURCH	NTNC	NO
ID6060123	FEDEX DISTRIBUTION CENTER BLACKFOOT	NTNC	NO
ID2250146	FIRST APOSTOLIC ACTS CHURCH	NTNC	NO
ID3140276	FLAMINGO WEST	NTNC	NO
ID4010267	FRANKLIN SENSORS	NTNC	NO
ID3140263	GAYLE MANUFACTURING CO	NTNC	NO
ID3140274	IDAHO YOUTH RANCH HANDS OF PROMISE	C	YES, Uranium MCL
ID6030070	INTERMOUNTAIN GAS COMPANY	NTNC	NO
ID3440037	INTRINSIC ORGANICS	NTNC	NO
ID1090295	LODGE HAVEN RANCH	C	NO
ID3140277	LOLYS DAYCARE	NTNC	NO
ID1280346	LONE MOUNTAIN ESTATES	C	NO
ID5070095	MOUNTAIN HUMANE	NTNC	NO
ID1280308	MOUNTAIN VIEW AT FARRAGUT PARK	C	NO
ID1090291	NORTHERN SKY WATER ASSN	C	NO
ID3230085	NOVITAS ACADEMY THERAPEUTIC HIGH SCHOOL	C	NO
ID5270035	OFFICE WAREHOUSE COMPLEX	NTNC	NO
ID3230086	RP EMMETT LLC	NTNC	NO
ID5070096	SAGE SPRINGS SUBDIVISION	C	NO
ID5070097	STARWEATHER ESTATES	C	NO

New Systems Capacity Demonstration

The “Idaho Rules for Public Drinking Water Systems,” IDAPA 58.01.08.500 require that owners of new PWSs demonstrate technical, financial, and managerial (TFM) capacity. Engineering documents include a facility plan, preliminary engineering report, demonstration of technical, financial and managerial capacity and plans and specifications. Section 500 of the Drinking Water Rules provides facility and design standards for the demonstration of TFM capacity of public drinking water systems. DEQ coordinates with local management, developers, and utilities to ensure capacity development requirements are being met.

Capacity Development for new community water systems also includes water systems that are developed to provide cost-effective solutions to existing public health problems such as unsafe individual wells or surface water sources within a specific geographic area. These water systems can receive Drinking Water State Revolving Funds to assist with planning and construction. These water systems are subject to the facility and design standards in IDAPA 58.01.08.500-548.

Engineering Assistance

DEQ reviews the TFM aspects of new PWS plans and specifications. A portion of this review is funded by the State Revolving Fund 2% Technical Assistance Set-Aside Grant. The list of new system tracked items includes:

- Facility Plans
- Preliminary Engineering Report
- Operation & Maintenance Manual
- Well Site Evaluation
- Well Completion Report
- Technical, Financial and Managerial Capacity Documentation

Technical Assistance

New water systems are assigned a public water system number that corresponds to the regional office that has jurisdiction over the water system. Additional assistance includes:

- Monitoring Schedules
- System Classification Requirements
- Operator Licensing Information
- Water System Inventory Information

3 Existing Systems Strategy

DEQ continues to provide ongoing TFM training and assistance to owners and operators of the state’s small public water systems. For the reporting period ending June 30, 2021, The State of Idaho had 2,007 active public water systems. Based on EPA’s classification of drinking water systems², 97% of Idaho’s PWSs are classified as “small” or “very small.” Of the 2,007 systems,

1,774 are classified as very small, 177 are small, 32 are medium, 22 are large, and 2 are very large.

² EPA size classifications for public water systems:

- Very small water systems serve 25–500 people.
- Small water systems serve 501–3,300 people.
- Medium water systems serve 3,301–10,000 people.
- Large water systems serve 10,001–100,000 people.
- Very large water systems serve 100,001+ people.

1. In referencing the State's approved existing systems strategy, which programs, tools, and/or activities were used, and how did each assist existing PWS's in acquiring and maintaining TMF capacity? Discuss the target audience these activities have been directed towards.

Technical and Compliance Assistance

DEQ Regional Office and District Health Department Drinking Water Staff—One avenue of disseminating information is through drinking water staff in DEQ's six regional offices and seven district health departments. One-on-one contacts are an effective method of assisting system operators. DEQ regional offices are located in the following cities throughout the state:

- Boise
- Coeur d'Alene
- Idaho Falls
- Lewiston
- Pocatello
- Twin Falls

Idaho's seven district health departments, listed below, are under contract with DEQ to provide technical assistance to the states small PWS owners and operators. Very small system owners are most challenged by Safe Drinking Water Act requirements because they typically depend on volunteer or part-time operators and have limited financial resources.

- Panhandle Health District
- Public Health—Idaho North Central District
- Southwest District Health
- Central District Health
- South Central Public Health District
- Southeastern Idaho Public Health
- Eastern Idaho Public Health District

Public Water System Switchboard

The public water system switchboard located at <https://www.deq.idaho.gov/pws-switchboard> provides water system owners and operators with links to rules and checklists to assist in the preparation of plans and specifications, public notification templates, sanitary survey forms, drinking water system classification requirements, operator licensing, and more.

Due to COVID-19, the switchboard was enhanced to highlight information on emergency preparedness, and with links to information on COVID-19 and drinking water including resources for public water systems reopening or returning to full service.

Resources available on the public water system switchboard include:

Consumer Confidence Reports (CCR) —The CCR reporting tool links owners and operators to water system sample results and violation history report to assist in preparation of their CCR. Information is provided regarding electronic report delivery and a link to EPA’s CCR iwriter. The CCR report tool includes reporting requirements under the RTCR. System owners who do not have access to a computer or the internet can contact DEQ to receive hard copies of the CCR templates, instructions, and a listing of the system’s violations and detections by mail.

Contaminants of Interest—Information is available on both regulated and unregulated contaminants.

Regulated

Health advisory information can be found for the following regulated contaminants: Arsenic, Coliform, Fluoride, Lead, Nitrate, Disinfection Byproducts, and Cryptosporidium and Giardia (Surface Water Treatment).

Unregulated Contaminants:

Drinking water health advisories are posted for Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) in addition to Blue-Green Algae and Harmful Algae Blooms (HABs) and manganese. Health advisories are non-enforceable technical guidelines to provide information on contaminants that can cause human health effects and are known (or anticipated) to occur in drinking water.

EPA provided Idaho with \$87,000 in funding during FY2020 and an additional \$126,000 in funding during FY2021 (\$213,000 total) through the Public Water System Supervision grant that is being utilized for investigation of per- and polyfluoroalkyl substances (PFAS) contamination in Idaho’s public drinking water sources. PFAS samples will be taken from public water system sources located downgradient from potential sources of PFAS. DEQ provided informational presentations regarding this sampling project during the reporting period to the Drinking Water Advisory Committee, Idaho Water Utilities Council, Ground Water Technical Committee, Association of Idaho Cities Water Summit, Idaho

Environmental Health Association, Idaho Water Quality Workshop, and Idaho Rural Water Association.

Disinfection Byproducts—This link provides direct access to information for the Stage 1 and Stage 2 DBP rule.

Lead in Drinking Water—Resources for the lead and copper rule are available on this site. The link includes rule information, templates regarding lead and copper sampling protocols, sample site selection, and consumer notifications of lead tap results and public education templates. There is also a link regarding lead in school drinking water, which contains health risk information, free testing information for public schools, and EPA's 3Ts guidance.

Monitoring Schedules—Water system operators and owners can easily review their current year monitoring requirements with this application. The report also identifies if the monitoring requirement has been satisfied once the sample has been entered into the Safe Drinking Water Information System.

Drinking Water Monitoring Waivers—The monitoring waiver application directs applicants to DEQ's online Source Water Assessment database where much of the information required to complete the application is located.

Lab Forms—This application can be used by system operators or owners to produce laboratory request forms. The application uses data in the state drinking water database to identify samples that are due during the current year.

Public Notification Templates—Templates are available for required RTRC tier 1 and 2 notifications, lead and copper, loss of pressure and non RTRC tier 1, 2, and 3 notifications. Links are available to templates for cyanotoxins in finished drinking water above the health advisory and manganese. The loss of pressure public notification includes an informational advisory (no boil water requirement) and a do not drink advisory.

Record Retention Schedule—This application provides water system operators and owners with the required retention schedule for all monitoring and reporting records.

Revised Total Coliform Rule—This link provides water system operators and owners access to seasonal start-up procedures, TCR sample siting plans, and assessment forms to evaluate potential sanitary defects following a total coliform positive triggering event.

Sample Results—Public Water System monitoring results are available online through DEQ's public version of Drinking Water Watch.

Sample Site Plan Templates—Water system operators are required to have sample site plans for coliform sampling, lead and copper, and disinfection byproducts. A link is available that takes water system operators directly to templates and instructions for completion of these required sample site plans.

SMART Management Financial Tool—This tool is designed to assist water systems with assessing their overall financial health. The tool prompts system personnel to enter information regarding their revenues, expenses, assets, liabilities, debt and reserves. Once the information is entered, the final screen has a set of dials which move to reflect the “financial health” of the water system. The application can be used to demonstrate the technical, financial, and managerial requirement of revenue sufficiency, satisfy the financial capacity checklist question in the sanitary survey and assist with SRF Loan Underwriting.

System Classification Requirements—This application produces real time system classifications based on DEQ’s Safe Drinking Water Information System database. Once a public water system’s information has been placed into the drinking water database, system classifications will automatically be generated through this automated “System Classification Worksheet” application.

Additional Assistance

Autodialer—DEQ provides automated telephone and email reminders to owners and operators of PWSs to inform them of upcoming sampling deadlines. This low-cost, high-impact activity has been well received by the operator community and resulted in a 50% reduction in failure-to-monitor violations. The calls have been expanded to include reminders for RTCR seasonal start up procedures and lead consumer notification at homeowner’s taps. The auto-dialer has also been used to notify water systems impacted by a regional power failure of the need to disinfect and flush public water systems.

Postcards—Seasonal water system operators were sent a postcard reminder regarding their seasonal start up procedures.

Grants and Loans

Information and solicitation for Letters of Interest are sent annually to PWSs and consulting engineers for planning grants or DWSRF loans with DEQ. Systems that submit Letters of Interest get on a priority list for the upcoming fiscal year.

The Planning Grant Program provides assistance to eligible public drinking water systems for facility planning projects designed to ensure safe and adequate supplies of drinking water. Grants awarded under this program are used to develop engineering reports identifying the most cost effective, environmentally sound method of upgrading a public drinking water system to achieve and maintain compliance with state and federal standards. Grants cover up

to 50% of eligible planning costs, with a matching share funded by local sources. In SFY 2021, DEQ approved 13 drinking water planning grants.

DEQ's DWSRF provides below-market-rate interest loans to help repair or build new drinking water facilities. The Safe Drinking Water Act allows states to establish a DWSRF program to assist public drinking water systems with financing infrastructure upgrades needed to protect public health and achieve and maintain compliance with the Safe Drinking Water Act requirements. The DWSRF authorizes grants to states to capitalize revolving loan funds. A revolving loan is a self-replenishing pool of money, using annual Federal capitalization grants, investment earnings, and interest and principal payments on old loans to issue new loans. In SFY 2021, DEQ awarded 7 loans to drinking water systems.

Source Water Protection Grants – In SFY2021, DEQ awarded 13 drinking water systems source water protection grants. The grant money comes from the State Revolving Fund wellhead protection program and can be used for activities that lead to the reduction in risk of contamination of a drinking water source. Projects funded included fencing and security cameras, well abandonment, education and outreach, iron bacteria testing and conversion of a drinking water well to a monitoring well.

Engineering Review for Existing Systems

In state fiscal year 2021, DEQ completed review of 1,287 projects related to drinking water capacity. These projects included review of:

- Facility Plan, Master Plans, Comprehensive Plan
- Operation and Maintenance Manual
- Plan and Specification Submittal
- Plans and Specifications approved by a Qualified Licensed Professional Engineer
- Record drawings
- TFM Capacity Documentation
- Request for waiver of IDAPA facility and design standard-related rules (IDAPA 58.01.08.500-548)
- Well completion report
- Public Drinking Water System Well Site Evaluation

2. Based on the existing system strategy, how has the State continued to identify systems in need of capacity development assistance?

Compliance data, sanitary survey information, and the Enforcement Tracking Tool are utilized to identify public water systems in greatest need of capacity assistance. DEQ also conducts Level 2 Site Assessments following an *E. coli* maximum contaminate level (MCL) violation. These assessments are used to identify sanitary defects or issues that led to the violation and recommend corrective actions to resolve the issue. Thirteen Level 2 Assessments for MCL violations were completed by staff during the reporting period. An additional 76 Level 2

Assessments were required for multiple total coliform positive samples in a 12 month period or insufficient repeats.

Sanitary Surveys

Comprehensive sanitary surveys continue to be a fundamental public health protective tool for assessing, evaluating, and documenting the TFM capacity of PWSs throughout the state. The surveys assist owners and operators in both short-term and long-term planning activities associated with their systems. Onsite inspections were limited for several months during the reporting period due to COVID-19. In SFY 2021, DEQ conducted 402 sanitary surveys.

These surveys are also used to coordinate assistance between DEQ and third-party service providers such as the Idaho Rural Water Association and Rural Community Assistance Corporation. These collaborative efforts have become increasingly important to leverage limited resources among organizations for the collective benefit of the public.

Sanitary Survey Procedures

In an effort to maintain consistency and ensure the sanitary survey process is backed by the enforceability of the rule requirements, a standardized sanitary survey form is utilized to evaluate the status of a public water system and to ensure the protection of public health.

Highlights of the sanitary survey form are listed below:

- The sanitary survey form incorporates a comprehensive review of a system’s technical, financial, and managerial capacity.
- The sanitary survey form, which has been developed in Excel, utilizes conditional formatting to automatically identify “significant deficiencies” as red, “deficiencies” as orange, and “recommendations” as yellow. This helps the inspector to quickly identify issues that need to be corrected.
- Each question has an associated report statement that can be placed into a report template for more efficient report generation.
- All significant deficiency report statements have a “Potential Health Risk” statement for clarification as to why the significant deficiency constitutes a public health threat.
- Deficiencies have a “Purpose” statement to further clarify the purpose of the deficiency.

Online Sanitary Survey Inspection Form

To assist system owners and operators in preparing for their sanitary survey, the “State of Idaho Public Water System Sanitary Survey” form used by state inspectors is available on DEQ’s Public Water System Switchboard.

Having this form available online provides increased transparency to the inspection process and enables system owners or operators to collect data in advance that they might not otherwise

have available in their daily operations. The sanitary survey form also standardizes the nature of the inspection, thereby ensuring all systems are held to the same standard regardless of system location or inspector, and decreases the time necessary to complete the inspection for both the inspector and the water system representative.

Inspectors encourage system operators to conduct self-inspections of their systems with these forms. Using this form has allowed operators to correct deficiencies in advance of the inspector's arrival at the system. This demonstrates the educational value of the self-inspection process.

Continuing Education Units (CEUs) are offered to operators of systems classified as "Very Small", "Distribution 1", and "Distribution 2". Water system owners and operators who complete limited pre-inspection "homework" activities, actively participate in the sanitary survey, and follow up corrective actions of deficiencies are provided CEUs. The opportunity to receive CEUs helps operators maintain their licensure requirements.

Preliminary Inspection Findings Form

The Preliminary Inspection Findings Form allows sanitary survey inspectors to leave a list of identified deficiencies with system operators so they can begin to make corrections immediately. At the bottom of the form, a section is provided where operators can request "Free Technical Assistance" from third party service providers. This allows the operator to get help in the following areas: financial management, specialized training, technical assistance, system operation, and source water protection. Forty eight water systems requested assistance through this process and the Preliminary Inspection Findings Forms were provided to the following third party service providers:

Idaho Rural Water Association (IRWA)
Rural Community Assistance Corporation (RCAC)

Sanitary Survey Significant Deficiency Tracking

Significant deficiencies identified during a sanitary survey are entered and tracked in the SDWIS database. A compliance schedule is created in SDWIS with due dates by which the significant deficiencies must be addressed. We utilize our Auto Dialer to send phone calls and emails to Public Water System personnel as the due date nears. The data collected assists DEQ staff in recognizing frequently identified significant deficiencies and allows us to direct technical assistance where needed.

Enforcement Tracking Tool

Water systems on the Enforcement Tracking Tool receive various assistance actions. The technical assistance provided included one or more of the following:

- Contacting the owner/operator by phone for technical assistance.

- Providing the owner/operator a tutorial of our Public Switchboard (*Idaho DEQ's hub of all Drinking Water Information: Rules, Monitoring Schedules, Lab Forms, Drinking Water Watch, Training Calendar, etc.*). This allows the operator to obtain information about various DEQ programs, access to state and federal regulations and policies, and downloads of instructional aids.
- Performing a site visit to evaluate system operations or to conduct Revised Total Coliform Rule (RTCR) assessments.
- Providing the operator with technical assistance through referral to a third party service provider.
- Providing Auto Dialer reminder calls and emails.
- Providing written correspondence such as failure to monitor letters, email, etc.
- Taking enforcement actions when necessary.

The number of water systems on the Enforcement Tracking Tool list each quarter varies based on unplanned health-based violations such as MCL's or *E. coli* events, in addition to RTCR, significant deficiencies and monitoring violations. Each violation is responded to by field staff and reported during quarterly meetings. Public water systems with a systemic pattern of violations are placed under an enforceable action to return it to compliance.

4 Capacity Assistance

3. During the reporting period, if statewide PWS capacity concerns or capacity development needs (TMF) have been identified, what was the State's approach in offering and/or providing assistance?

The Idaho Drinking Water Bureau focuses on web-based resources and training materials to assist with training. The bureau continues to educate members of the water industry through DEQ's "Public Water System Switchboard," where water operators can obtain information about various DEQ programs, access state and federal regulations and policies, and download instructional aids. Some of the training information provided on the Switchboard is described below:

Training Calendar—The PWS Switchboard has a link to a comprehensive training calendar. The calendar is populated by trainers with class information as soon as it is available. This calendar provides timely information about training for owners and operators of PWSs and can be found at

Cross-Connection Control—A link provides answers to frequently asked questions about cross-connection control. It also explains what a cross-connection is and advises water purveyors on measures that must be taken to protect their water systems against contamination and pollution from cross-connections.

Sanitary Survey Continuing Education Units—Continuing Education Units are provided by DEQ to the operators of systems classified as "Very Small" water systems, "Distribution

1”, and “Distribution 2” systems for successfully completing limited pre-inspection “homework”, actively participating in the sanitary survey and follow-up corrective action planning associated with the sanitary survey. During the reporting period, DEQ issued 58 Continuing Education Unit certificates.

Sanitary Survey Form—The “State of Idaho Public Water System Sanitary Survey” form used by DEQ drinking water inspectors is available to system owners and operators for use as a checklist to prepare for their next sanitary survey.

“How to Sample” Videos—The American Water Works Association water sampling procedure videos (via YouTube) demonstrate sampling techniques for various contaminants.

Operation and Maintenance (O&M) Training Videos—A link is provided to video modules to help operate and manage small water and wastewater facilities. These can be found under the section entitled, “Water & Wastewater Utility Operation and Management for Small Communities”.

Additional Training and Workshop Opportunities

DEQ Regional Operator Workshops—DEQ’s six regional offices recognize the value of local, face-to-face training and hold drinking water workshops in their areas on an as-needed basis for system operators and owners. Due to COVID-19, no workshops were held SFY2021.

Source Water Protection Workshops—DEQ held a full day online source water protection workshop titled “Ground Water Fundamentals”. Source water protection information was incorporated into the workshop.

Water Quality Loan Program—The water quality grant and loan program participated in several speaking engagements promoting the program. These included a joint training with Idaho Bond Bank, Idaho Department of Water Resources, Idaho Department of Commerce, and Army Corp of Engineers. They also spoke at the Association of Idaho Cities conference.

Idaho Rural Water Statewide Training—During the reporting period, DEQ staff in collaboration with the Idaho Rural Water Association, conducted training to operators during the Idaho Rural Water Association conference and during workshops regarding PFAS/PFOA sampling, preparing for a sanitary survey and Emergency Response Plans. Idaho Rural Water Association offers classes for operators. Available classes and schedules may be accessed on the IRWA website and are displayed on the DEQ training calendar.

Environmental Finance Centers—The Environmental Finance Centers provide various webinars to help address the financial and managerial training needs of operators in Idaho. Available classes and schedules may be accessed on the EFC website and can be displayed on the DEQ training calendar.

Idaho Department of Occupational and Professional Licenses (IDOPL)—Additional information on operator training requirements is provided by IDOPL at its Idaho Training and Continuing Education Reference Guide website.

Rural Community Assistance Corporation – RCAC provides operator training and technical and financial assistance to public water system personnel. DEQ staff participated in online training regarding asset management, sample site plans, and emergency response plans.

DEQ is continuing efforts to revise the guidance document titled *How to Demonstrate Financial, Technical, and Managerial Capacity in New Public Water Systems*, which describes the elements of water system infrastructure, financing, management, and operations that should be considered to demonstrate to DEQ the TFM capability of new or substantially modified community or non-transient non-community PWSs. The guidance is intended to assist new or substantially modified PWSs in developing TFM capacity and thereby ensure the consistent delivery of safe drinking water.

DEQ will prioritize efforts to track capacity development through:

- Sanitary Surveys
- Compliance History and Trends
- DWSRF Program
- Third Party Provider Contact
- Engineering Reviews

4. If the State performed a review of implementation of the existing strategy during the previous year, discuss the review and how findings have been or may be addressed.

DEQ has reviewed the implementation of the Existing Systems Strategy during the reporting period and is in the process of revising the Capacity Development Strategy to address the AWIA requirements for asset management.

Special effort during this reporting period focused on informing water systems on Risk and Resilience Assessments and Emergency Response Plan requirements through direct email contact to water system operators and owners and participation in an ERP webinar sponsored by Idaho Rural Water Association.

5. Did the State make any modifications to the existing system strategy? If so, describe.

No finalized modifications have been made for this reporting period. The current strategy is being revised to include asset management requirements and is undergoing the review process.