

Capacity Development Implementation Report to the US Environmental Protection Agency

State Fiscal Year 2023



State of Idaho
Department of Environmental Quality



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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
HAB	Harmful Algae Bloom
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 2023 (July 1, 2022–June 30, 2023). 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. 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.

To better accommodate the changing work environment and increase convenience to water system personnel, efforts have been made to provide additional web-based resources, zoom trainings and meetings, and phone and email communication.

Idaho’s Capacity Development Strategy was , updated, and approved by EPA in 2022, 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 7/1/2022 – 6/30/2023

PWS ID	NAME	System Type	ACTIVITY DATE
ID7300156	JERVOIS COBALT MINE	NTNC	9/1/2022
ID7100229	RIVERBEND MEATS	NTNC	12/21/2022
ID4200109	SIMPLOT WOOD CREEK	NTNC	2/9/2023
ID7220156	VALLEY VIEW SUBDIVISION	NTNC	8/8/2022
ID7100228	WIGHT FARMS	NTNC	11/10/2022

Based on the violation score list on the Enforcement Tracking Tool (ETT) list, no water systems 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 18 systems.

Table 2: ETT History for Community and Non-Transient Non-Community active public water systems established during SFYs 2020 – 2021, 2021 – 2022, 2022 - 2023

PWS ID	NAME	System Type	ETT History
ID7300156	JERVOIS COBALT MINE	NTNC	NO
ID7100229	RIVERBEND MEATS	NTNC	NO
ID4200109	SIMPLOT WOOD CREEK	NTNC	NO
ID7220156*	VALLEY VIEW SUBDIVISION	NTNC	NO
ID7100228	WIGHT FARMS	NTNC	NO
ID7100226	THE CENTER AT RAINY CREEK	C	NO
ID3140276	FLAMINGO WEST	NTNC	NO
ID4010267	FRANKLIN SENSORS	NTNC	NO
ID1090297	IDAHO CLUB	C	NO
ID3140274	IDAHO YOUTH RANCH HANDS OF PROMISE	C	NO
ID3440037*	INTRINSIC ORGANICS	NTNC	NO
ID1090295	LODGE HAVEN RANCH	C	NO
ID3140277	LOLYS DAYCARE	NTNC	NO
ID7330077	SAFETY PROVISIONS	NTNC	NO
ID7330076	UPS-REXBURG (IDREX)	NTNC	NO

*Intrinsic Origins has since been deregulated.

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, 2023, The State of Idaho had 2017 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 2017 systems, 1,7680 are classified as very small, 181 are small, 31 are medium, 22 are large, and 3 are very large.

²EPA 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 TFM 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 in the following cities throughout the state:

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

Six of Idaho’s 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

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.

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 provide Idaho with \$126,000 in funding during FY2023 through the Public Water System Supervision grant 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, 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—A dedicated Lead/Copper button is under development to guide drinking water owners/operators to the resources needed for all lead/copper rules and inventory information. Resources for the lead and copper rule are currently available on under the Contaminants and Compliance Information button. 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. A link regarding lead in school drinking water, which contains health risk information, free testing information for public schools, and EPA's 3Ts guidance is found under the Grants and Loans button on the PWS Switchboard.

Emergency Preparedness/IDWARN—This site has includes links to resources on emergency response plans, resiliency, drought, earthquakes, flooding, wildfires, power outages and emergency generators

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—DEQ is developing two applications that will automate the monitoring waiver submittal and review process. The monitoring waiver submittal application allows candidates to answer questions and submit information for each active permanent source that is eligible for monitoring waivers. The monitoring waiver review application takes the submitted data from the applicant and auto generates an approved or denied response with a reason(s) for denial determination. The waiver determinations are based on applicant data, SDWIS sampling history, SDWIS violation history, or source water assessment scores. Waiver denial determinations can be overridden with justification from the compliance officer. Once monitoring waiver determinations are finalized for each active permanent source, a letter will be auto generated and sent to the public water systems owner/operator. This new process will produce efficiency through consistency and standardization. .

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. Reminders are sent for chemical monitoring (excluding RADS), lead/copper, RTCR (Quarterly), Unaddressed Significant Deficiencies and Public Notifications. This low-cost, high-impact activity has resulted in a 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.

Seasonal Start-Up—Seasonal water system operators were sent a reminder letter regarding their seasonal start up procedures. The seasonal start-up checklist is now an electronic application and submittal. It is available on the PWS Switchboard under the Revised Total Coliform Rule button.

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 2023, DEQ approved 66 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 2023, DEQ awarded 9 loans to drinking water systems. An additional 16 construction projects received ARPA funding.

Source Water Protection Grants – In SFY2023, DEQ extended 6 grants from the previous competitive grant cycle and awarded 16 drinking water source water protection grants. Nearly \$300,000 in grants were selected for funding. 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, and replacement of hollow metal doors with solid steel doors on drinking water well houses to increase security.

Engineering Review for Existing Systems

In state fiscal year 2023, DEQ completed review of 1,151 projects related to drinking water capacity. These projects included review of:

- Facility Plan, Master Plans, Comprehensive Plan
- General Report/Study
- Operation and Maintenance Manual
- Plan and Specification Submittal
- Preliminary Engineering Reports
- Plans and Specifications approved by a Qualified Licensed Professional Engineer
- Record drawings
- Standard Specifications
- 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. Sixty-three water systems required a Level 2 Assessment in SFY 23. This included multiple total coliform positive level 1 violations, insufficient repeats or MCL violations. Sixteen of the Level 2 Assessments were for MCL violations and the assessments were completed by staff during the reporting period.

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. In SFY 2023, DEQ conducted 398 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

DEQ has moved to an electronic sanitary survey format. This format maintains consistency of inspections across the state and results in a more efficient, time-saving report.. The sanitary survey process is backed by the enforceability of the rule requirements. 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 financial/managerial module in the electronic sanitary survey has been enhanced to collect information to be used to better assess water system capacity.
- The sanitary survey form, automatically identifies “significant deficiencies” “deficiencies”, and “recommendations”
- The field checklist is generated based on the information entered in SDWIS. All questions on the form are required to be answered and any changes to the auto-generated deficiencies require an explanation as to why the deficiency is not applicable to the system.
- Each question has an associated report statement that will be automatically placed into the 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.
- The inspector adds or updates a narrative description of the water system. The cover letter, report and any deficiencies and recommendations are then auto generated and sent to the water system.

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. In SFY2023, 42 Sanitary Survey CEU certificates were issued.

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. Thirty-two 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. In SFY 2023, DEQ continued to improve capacity resources on the PWS Switchboard. 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.

Capacity Development – In addition to the existing step guides and capacity development reports, this web page has been enhanced to include links to the Environmental Finance Center Network and EPA’s TMF Capacity Resources. An Asset Management Frequently Asked Questions document was developed and added to the switchboard in addition to the link to the EFC Asset Management switchboard. Links to information on cybersecurity and water loss are also located on this web page. **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. A link is provided to the Idaho Rural Water Association (IRWA) cross connection control template. Fact sheets on backflow prevention assemblies and common homeowner cross connections are available on this page.

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 42 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. DEQ has developed an electronic sanitary survey that will assist with assessing the capacity of water systems. The sanitary survey financial/managerial checklist questions have been enhanced to better assess water system capacity. As DEQ moves to a new electronic data storage system, the program will be able to create a capacity folder that will help identify water systems needing capacity assistance. Since implementation of the electronic sanitary survey, a manual inspection of the financial/managerial checklists indicate the most common issues found during a survey to include:

- Lack of an Asset Management Plan
- No Cross Connection Control Program
- No Independent Financial Audit
- Lack of Operation and Maintenance Manual
- Lack of Water Efficiency/Water Loss Program

DEQ is working with third-party providers to ensure training is made available to address these issues. The PWS Switchboard continues to be updated to provide resources that can also assist with maintaining capacity.

“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)—The O & M button on the PWS switchboard has been updated to include a link to Drinking Water Operation and Maintenance Manual checklist and A link to operation and maintenance videos developed by Rural Community Assistance include videos on distribution, hydrant flushing, valve maintenance and more. partnership.odules

Training and Workshops

To assist water systems in achieving and maintain technical, managerial and financial capacity, and to prepare water systems for new regulatory requirements, DEQ staff conducted training on lead service line inventories, PFAS/PFOA, HABS, and funding opportunities. Presentations regarding these requirements were also made to several external organizations.

Presentations – Staff presentations were made to a number of organizations on PFAS, Lead/Copper Service Line Inventories and Funding Options that included the Association of Idaho Cities, the Ground Water Technical Meeting Committee, the Idaho Drinking Water Advisory Committee, Idaho Water Utility Council Idaho Rural Success Summit , and the Pacific Northwest Clean Water Association..

The features of the new electronic sanitary survey were presented to the EPA Region 10 Drinking Water Group and at the ASDWA Members meeting.

HABS

DEQ sponsored a drinking water operator training on cyanotoxins, monitoring options, and treatment optimization. There were 75 registrants and 40 CEU certificates issued. The 6-hour training is available on DEQ’s YouTube channel.

Harmful Algal Bloom (HABs or cyanoHABs) educational newsletters are sent out monthly to Public Water systems. Currently there are over 226 registered emails that automatically receive the newsletter. There have also been requests from EPA staff, operators and regulators from other states, engineers and a variety of others who have requested copies of the newsletter.

Presentations were made on benthic cyanoHABs, taste and odor issues connected with cyanobacteria, and how to use the AWWA cyanotox calculator dosage and contact time for systems using chemicals to degrade cyanotoxins were given at the Idaho Rural Water Spring Conference and their Webinar Wednesdays series.

Lead/Copper

Public water system administrative contacts, owners and operators were sent a letter informing them of the service line inventory requirement. The letter included the inventory template that

water systems are required to utilize and submit when completing their inventories. In addition to the template, the letter listed upcoming training about the provisions in the new rule as well as in-depth training on strategies for creating an inventory that meets rule requirements.

Presentations directly related to lead/copper rule revisions and service line inventories for owners and operators were made by DEQ staff at the following:

- Fall 2022 IRWA Operator Conference
- Association of Idaho Public Works Professional Conference
- IRWA Webinar Wednesday
- Spring IRWA Operator Conference
- Statewide LCRR/LSLI 5-hour workshops in Boise, Idaho Falls and Couer dAlene in conjunction with 120 Water.

Water Quality Loan Program— In SFY 2023, the program developed a quarterly newsletter for water and wastewater systems to provide updates on funding requirements and technical assistance opportunities. They have updated their customer handbook to assist applicants and project owners with the SRF application process and execution of projects. The Loan and Grant program also produces training videos that are recordings of presentations regarding Letters of Interest, Bipartisan Infrastructure, Planning Grants and SRF and ARPA application training. The videos are available on the DEQ YouTube channel. Loan and Grant staff made presentations to

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 Webinar Wednesdays. , 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 have entered into cooperative agreements with EPA to provide technical assistance to ensure communities that have difficulty in securing public funding receive the help they need to access resources for infrastructure improvements. RCAC was selected to administer the EFC in Region 10. DEQ has met monthly with EPA and RCAC to identify water systems and discuss technical assistance opportunities.

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. Their services are directed to small low-income communities in rural areas to ensure they comply with state and federal regulations. DEQ staff have participated annually in various online trainings DEQ meets quarterly with RCAC to discuss progress on water systems they are working with and updates to our PIFF form referrals

DEQ has completed the revision of to the guidance document titled *Demonstrating 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 continue to 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 the revision of the Capacity Development Strategy to address the AWIA requirements for asset management.

Efforts continue to focus on ensuring water systems are fully informed regarding the upcoming lead service line inventory requirements, opportunities for funding and technical assistance. Workshops were held throughout the state to explain the lead service line inventory requirements and the state is moving forward with contractors to provide onsite assistance to water systems completing inventories. The new electronic sanitary survey will be used to help identify water system capacity and where resources should be focused.

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

The existing strategy has been updated, reviewed by the Drinking Water Advisory Committee, posted for public comment and approved by EPA.

Attachment 1
New Systems Spreadsheet

PWS Number	NAME	System Type	ACTIVITY STATUS	ACTIVITY_DATE
ID7300016	JERVOIS COBALT MINE	NTNC	A	9/1/2022
ID7100229	RIVERBEND MEATS	NTNC	A	12/21/2022
ID4200109	SIMPLOT WOOD CREEK	NTNC	A	2/9/2023
ID7221056	VALLEY VIEW SUBDIVISION	NTNC	A	8/8/2022
ID7100228	WIGHT FARMS	NTNC	A	11/10/2022
	ETT History for C and NTNC SFY 2020 - 2023			ETT History
ID7100226	THE CENTER AT RAINY CREEK	C	A	NO
ID3140276	FLAMINGO WEST	NTNC	A	NO
ID4010267	FRANKLIN SENSORS	NTNC	A	NO
ID1090297	IDAHO CLUB	C		NO
ID3140274	IDAHO YOUTH RANCH HANDS OF PROMISE	C	A	NO
ID3440037	INTRINSIC ORGANICS	NTNC	I	NO
ID1090295	LODGE HAVEN RANCH	C	A	NO
ID3140277	LOLYS DAYCARE	NTNC	A	NO
ID7330077	SAFETY PROVISIONS	NTNC	A	NO
ID7330076	UPS-REXBURG (IDREX)	NTNC	A	NO