



Department of Health Office of Drinking Water

Policy

Title:	Sanitary Survey Frequency for Surface Water Systems	Number: A.18
Procedure:	No associated procedure	
References:	Group A Public Water Supplies, Chapter 246-290 WAC, 40 CFR 142.16(b)(3)(ii)	
Applies to:	Group A Community Water Systems Using Only Surface Water	
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Introduction

Group A community water systems that procure all their drinking water supply from a water system that treats surface water will be considered to have demonstrated outstanding performance and be eligible for a survey once every five years if all of the following criteria are met:

1. Has no total coliform or *E. coli* MCL violations since the last sanitary survey;
2. Has no coliform treatment technique violations for failure to conduct the required assessment or complete corrective actions in response to a treatment technique trigger since the last sanitary survey;
3. Has no more than one total coliform monitoring violation since the last sanitary survey; and
4. Has no unresolved significant deficiencies from the current sanitary survey;

Background and Analysis

The 1998 Interim Enhanced Surface Water Treatment Rule (IESWTR) established a three-year sanitary survey frequency for community surface water systems. The U.S. Environmental Protection Agency (EPA) considers community surface water systems to include (1) community systems that treat surface water; and (2) consecutive community water systems that procure all their drinking water supply from a system that treats surface water. Community water systems that purchase surface water and operate their own groundwater sources are subject to the sanitary survey frequency criteria applicable to groundwater systems described under WAC 246-290-416(1)(a).

The IESWTR allows States to reduce the sanitary survey frequency for community surface water systems under certain conditions:

For community systems determined by the State to have outstanding performance based on prior sanitary surveys, subsequent sanitary surveys may be conducted no less than every five years. In its primacy application, the State must describe how it will decide whether a system has outstanding performance and is thus eligible for sanitary surveys at a reduced frequency. 40 CFR 142.16(b)(3)(ii)

WAC 246-290-416 (1) is consistent with IESWTR in stating:

All public water systems shall submit to a sanitary survey conducted by the department, or the department's designee, based upon the following schedule:

(c) For community water systems that use a surface water or GWI source, every three years. Sanitary surveys may be reduced to every five years upon written approval from the department.

The Department considers consecutive community water systems that procure all their drinking water supply from a system that treats surface water a lower risk to public health compared with systems operating surface water treatment facilities. Given the opportunity to differentiate the survey frequency between these two types of community systems, the Department concludes that community systems operating surface water treatment facilities shall be surveyed once every three years and consecutive community water systems that procure all their drinking water supply from a system that treats surface water and demonstrating outstanding performance shall be eligible for a reduced survey frequency of once every five years, in accordance with the provisions of WAC 246-290-416(1)(c).

The criteria for outstanding performance for consecutive community water systems that procure all their drinking water supply from a system that treats surface water is identical to the criteria for community water systems that purchase surface water and operate their own groundwater sources. The Department considers consecutive systems to be no more of a risk to public health than a water system supplied by groundwater.