



Capacity Development Implementation

Annual End of Year Report

State Fiscal Year 2019

FY 2019 DWSRF Withholding Determination

**Engineering Section
Arkansas Department of Health**

1. Summary of State Capacity Development Program Annual Reporting Criteria

A. 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. If not, no additional information on legal authority is necessary.

ANS: No

2. Have there been any modifications to the State's control points? 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.

ANS: No

3. List new systems (PWSID & Name) in the State within the past three years, and indicate whether those systems have been on the Enforcement Targeting Tool lists (as generated annually by EPA's Office of Enforcement and Compliance Assurance).

ANS: See Attachment A for a complete listing.

B. Existing System Strategy

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 FMT capacity? Discuss the target audience these activities have been directed towards.

ANS: See Attachment B, pages 5 - 9 for a description of the tools, programs and activities that the Engineering Section used for assisting PWS's acquire and maintain FMT capacity. The target audience for these activities is water systems with a retail population below 10,000.

The primary focus of the Capacity Development strategy is to provide Technical Assistance Contractors focusing on Technical/Operational and Financial/Managerial issues. Other direct or indirect program activities that encourage capacity development are:

- Enforcement
- Operator Training/Certification
- Long Range Plans
- Sanitary Surveys
- Regionalization Efforts
- Technical Assistance
- Consumer Confidence Reports

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

ANS: In accordance with the strategy, a priority list is prepared, at least annually, that ranks each public water system with a population under 10,000 according to FMT need. The list is utilized by the technical assistance contractors as they provide technical assistance.

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

ANS: The primary method to determine capacity development need is current or future compliance ability. The major focus of the point system for the priority list is points received based on frequency and severity of violations. The priority list is updated monthly, based on a review of the violations. Any system that could potentially become a significant violator would be offered assistance from one of the technical assistance providers or from the ADH staff.

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

ANS: No formal review of the implementation efforts has been conducted.

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

ANS: There were no formal modifications to the existing system strategy for this reporting period.

2. Reporting Period and Submittal Dates

The annual implementation reporting period is based on the State Fiscal Year. The SFY closed on 06/30/2019.

The report is due to USEPA Region VI offices on or before 09/30/2019.

Attachment A
New System Strategy

The following information is provided to demonstrate how the State is ensuring “NEW” drinking water systems have technical, managerial, and financial capacity:

1. A list of “new” community water systems and “new” non-transient, non-community water systems that previously have been approved during the past three [3] years, which have demonstrated technical, managerial, and financial capacity with respect to each national primary drinking water regulation in effect, or likely to be in effect, on the date of commencement of operations.

For reporting purposes, “approved during the past three [3] years” means systems which have been previously approved but were activated during the SFY 2017 - 2019 reporting period.

| PWSid | Public Water System Name | Rpt Yr |
|-------|---------------------------------|--------|
| 1227 | JLM VA Hospital | 2016 |
| 1240 | Pine Top Water Facilities Board | 2018 |
| 1243 | Happy Feet Learning Center | 2018 |

2. A brief description of the process ADH has taken to ensure that these “new” drinking water systems have technical, managerial, and financial capacity.
 - a. All “New” systems undergo review and approval in accordance with the “New” systems strategy approved by Region VI.
 - b. All systems are monitored for all applicable state and federal regulations. Violations are issued as required.
 - c. All “new” systems will be given a FMT assessment as part of the Small System Technical Assistance Contract(s).

Attachment B

Existing System Strategy

1. Technical Assistance Contracts - Technical/Operational [TO] Contract

For SFY 2019 the TO Contractor, Arkansas Rural Water Association [ARWA] completed the following:

1,401.75 Technical Assistance Hours

Technical Assistance was performed at the following systems:

| PWSid | Public Water System Name | PWSid | Public Water System Name |
|-------|--------------------------|-------|---------------------------|
| 377 | Bassett | 297 | Lewisville |
| 1178 | Baxter Marion Regional | 718 | Lurton Pelsor |
| 462 | Bee Branch | 421 | Marvell |
| 178 | Bois D'Arc Water | 599 | McCroy |
| 564 | Clinton | 256 | Melbourne |
| 772 | East Johnson County | 1075 | North Howard County Rural |
| 809 | East Logan County | 998 | Ozark Mountain Regional |
| 083 | Eudora | 598 | Patterson |
| 046 | Fifty Six | 121 | Plumerville |
| 164 | Fordyce | 354 | Pyatt |
| 047 | Garfield | 239 | Riviera Utilities |
| 086 | Gum Springs | 540 | Shady Acres MHP |
| 402 | Harmony Grove | 815 | South Mountain |
| 276 | Jefferson Samples | 556 | Strong |
| 640 | Johnson Township | 156 | Turrell |
| 287 | Knoxville | 065 | Valley Springs |
| 780 | Lake Lucerne | 283 | Wabbaseka |
| 288 | Lamar | 695 | Wright Pastoria |
| 063 | Lead Hill | | |

Some of the highlights of the assistance given by ARWA this year as part of the TO Contract were helping with surface water treatment plant operations, chlorine dosing problems, chlorine safety, helping with low distribution pressures, solving pump problems, helping solve iron removal problems, performing water audits, locating leaks, flow testing of wells, and optimizing corrosion control treatment for lead and copper.

2. Technical Assistance Contracts – Financial and Managerial [FM] Contract

For SFY 2019, our FM Contractor, Communities Unlimited [CU] completed the following:

986.75 Technical Assistance Hours

Technical Assistance was performed at the following systems:

| PWSid | Water System | PWSid | Water System |
|--------------|---------------------|--------------|---------------------|
| 1178 | Baxter Marion RWA | 998 | Ozark Mountain |
| 887 | Bodcaw | 040 | Rambo |
| 564 | Clinton | 477 | Ravenden Springs |
| 669 | Compton | 084 | Readland Grand Lake |
| 082 | Dermott | 094 | St. Francis |
| 083 | Eudora | 556 | Strong |
| 506 | Hartford | 057 | Sulphur Springs |
| 175 | Northern Ohio WA | 695 | Wright Pastoria |

Each year Communities Unlimited provides a number of activities to assist the water systems improve their financial and managerial capacity. The emphasis is placed on assisting systems with asset management plans, rate studies, long range plans, emergency response plans and budget analysis. Some of the ways Communities Unlimited assisted small water systems was by performing rate studies and determining new rate structures, assisting with long range plans, helping to develop office procedures, helping to develop billing procedures, and working to eliminate unaccounted for water.

3. The Technical Assistance Contracts are the focus of our capacity development efforts and are funded through the technical assistance SRF set-asides. There are a number of other direct and indirect program activities that encourage and assist our public water systems improve their capacity. They are as follows:

a. Enforcement Actions

The Engineering Section has an enforcement plan in place to assist those systems which are significant or reoccurring violators. The plan has been in place for a number of years. The Engineering Section has a Compliance Officer who tracks enforcement efforts and pursues enforcement actions that are warranted.

In SFY 2019, the Capacity Development Coordinator continued the process started in SFY 2008 of meeting with the Compliance Officer monthly to go over the Engineering Section monthly grading significant non-complier list. Each system is reviewed and a list of "Hot Systems" is prepared by the Capacity Development Coordinator. The Capacity Development Coordinator contacts these systems to see what assistance can be given. If appropriate, ARWA or CU is invited to provide direct assistance through our contract services.

We are hopeful that with additional contact and capacity assistance that some of the recurring violators may be minimized.

b. Operator License Certification/Training

The Engineering Section has an Operator Certification/Training program in place to assist operators to comply with all of the licensing requirements. The Engineering Section now has a Compliance Manual specifically designed for training the operator about their regulatory requirements. The Engineering Section provides about sixteen, one day classes each year designed to introduce any operator to the various USEPA and State regulatory requirements.

In addition, the Engineering Section also provides a number of specialized training events each year, such as:

- Fluoride Training
- Consumer Confidence Training
- Surface Water Treatment Plant Optimization
- Lead and Copper Training
- Disinfection and Disinfection-By Product Training
- Upcoming Regulatory Training

During SFY 2019, the Capacity Development Coordinator met with the Operator Certification Officer to identify and target systems with operator certification or training issues.

c. Sanitary Surveys

Sanitary surveys are an important part of evaluating the capacity of systems to comply with the SDWA. Beginning in SFY 2010, the Capacity Development Coordinator regularly reviews the newly completed surveys to determine if there are capacity issues that need to be addressed, such as:

- Source capacity issues
- Treatment issues
- Distribution issues
- Low pressure areas
- Water Quality issues
- Reporting issues
- Operator certification issues
- Operator training issues

The capacity development coordinator worked with systems with FMT needs and assigned a contractor to assist.

d. Long Range Plans

The Engineering Section has adopted the policy of encouraging all existing systems to prepare and update long range plans. Special emphasis is placed on those water systems with chronic problems that could be helped by an overall long range plan to guide them.

e. Regionalization

Although our Engineering Section cannot require regionalization under its regulations, it certainly does encourage regionalization as strongly as possible as part of our “New” system strategy and during plan review of “Existing” systems.

The Engineering Section is a member of the State Water and Wastewater Advisory Committee which meets on a regular basis to review applications for new construction loans. As part of that review process with other State Agencies, utilities are encouraged to consolidate or interconnect where possible. Regionalization is encouraged also during the DWSRF loan application process. Applicants making connection or consolidation are awarded additional priority points.

The Capacity Development Coordinator will be working with the regional staff next year to identify those systems that would be best served by consolidating or interconnecting with other systems that are better prepared to meet the requirements of the SDWA.

f. Technical Assistance

The Engineering Section provides one-on-one technical assistance to water systems as part of our regional and statewide program activities. On a regional basis, the District staff provides assistance through the sanitary survey process, plan review and onsite assistance with sampling, water treatment and other issues. On a statewide basis, the Technical Assistance staff provides guidance, training and implementation of the various USEPA rule packages that are not directly implemented on a regional basis. This assistance provides guidance on the Lead/Copper Rule, SW Treatment Rule, D/DBP Rules and the Groundwater Rule.

The Capacity Development Coordinator will be working with the regional staff next year to

host some training sessions on Board Member Training, Asset Management training, and other key topics to assist the regional staff as they work with the water systems on implementing the various rule packages and their implications.

g. CCR Assistance

Each year our staff drafts approximately 663 Consumer Confidence Reports based on the water quality and violation status of each water system. These CCR reports are made available to the utility in a format that is ready for mailing, publishing in their local newspaper, or posting online. Beginning in 2013, the Engineering Staff assisted water systems with electronic CCR distribution. We host all community water systems' CCRs on our website and provide training at various locations throughout the state.

This assistance has been very effective. We have a very low percentage of non-filing, inadequate formatting and non-reporting of certification.