

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
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June 15, 2023

PWS ID#: 11401544

Theresa Village Clerk - Becky Tellier
202 S MILWAUKEE
PO BOX 327
THERESA, WI 53091-0327

Theresa Waterworks - MC
Dodge County

Subject: Sanitary Survey Report and Notice of Noncompliance

Dear Ms. Tellier:

The purpose of a sanitary survey is to evaluate the system's source, facilities, equipment, operation, maintenance, and management as they relate to providing safe drinking water. The sanitary survey is also an opportunity to update the Department's records, provide technical assistance, and identify potential risks that may adversely affect drinking water quality. This Sanitary Survey Report also serves as a Notice of Noncompliance.

On 5/16/2023, Sophia Stevenson conducted a sanitary survey of your water system, Theresa Waterworks. During the sanitary survey Corey Clark was present. At the completion of the survey, he was briefed on the preliminary findings. This report outlines the final findings, discusses problems that need to be addressed, and timelines for corrective action where appropriate.

A plan for corrective action, including a work schedule must be completed by July 30, 2023. A proposed corrective action plan and schedule is included below. Please contact me to discuss this before **July 30, 2023**. Depending on the type of corrective action you employ, you may need to obtain prior approval and submit additional plans to the Department.

System Summary

The Village of Theresa (Village) is located in northeastern Dodge County, approximately 18 miles south of the City of Fond du Lac. According to recent estimates, the Village has a population of 1,262 people. Theresa Waterworks (Waterworks) is owned and operated by the Village as a public water utility.

The present facilities include 2 wells and pumphouses (Wells 1 and 2), a 200,000-gallon elevated storage tank (Tower), and a distribution system consisting of about 50,000 feet of water main. Well 2 is currently under an Extended Well Abandonment Agreement (EWAA) for elevated radium that was signed on March 10, 2021.

Chemical addition at both wells includes sodium hypochlorite for disinfection and a blended phosphate for corrosion control and sequestration.

Significant Deficiencies

During the course of the sanitary survey, 1 significant deficiency was identified. Significant deficiencies indicate noncompliance with one or more Wisconsin Administrative Codes and/or represent an immediate health risk to consumers. As such, the deficiency listed below should be corrected as soon as possible.

Significant Deficiency	Compliance Due Date	Code Citation
1. Past inspection deficiencies have not been corrected as required.	8/31/2023	810.13(1)(d)

Discussion and Schedule for Correction of Significant Deficiencies:

- During the review of the Waterworks both before, during, and after the inspection, one non-significant deficiency was noted in the 2020 sanitary survey that was also present during the May 2023 inspection.

In the 2020 sanitary survey inspection, it was noted that no log book was being kept for the auxiliary power at Well 1. The Waterworks was given until the end of February 2021 to begin recording the exercises and any maintenance in a log. During the 2023 inspection, no log book was present.

The Waterworks shall create a log book to document all exercises and any maintenance for the auxiliary power at Well 2. The deadline for this corrective action is **August 31, 2023**.

Deficiencies

During the course of the sanitary survey, 4 deficiencies were identified. Deficiencies are problems in the drinking water system that have the potential to cause serious health risks or represent long-term health risks to consumers. These deficiencies may indicate noncompliance with one or more Wisconsin Administrative Codes. Corrective action should be completed for these deficiencies as soon as possible. If there were any significant deficiencies identified above, those should undergo corrective action first.

Deficiency	Compliance Due Date	Code Citation
1. The proper testing equipment for chlorine is not calibrated.	7/31/2023	811.48(3), 810.03
2. Hydrants with insufficient flows have not been color coded or tagged.	9/29/2023	810.11
3. The Waterworks is not implementing a comprehensive Cross-Connection Control Program.	12/29/2023	810.15(1)
4. The Waterworks is not implementing a comprehensive Private Well Abandonment / Permitting Program.	5/31/2026	810.16(2)

Discussion and Schedule for Correction of Deficiencies:

- Routine calibration checks of the free chlorine residual monitoring instruments are not being conducted. The Waterworks shall begin routinely verifying the calibration of the analyzer for chlorine with either a standard that is made up on site using the procedure outlined in Standard Methods or gel standards available from your analyzer supplier. Chlorine analyzers shall be checked every 10 samples, so once every 3-4 weeks. A log shall also be maintained of when calibrations occur. The deadline for this corrective action is **July 31, 2023**.

- A handful of hydrants in the Village have static and residual pressure that is low enough to potentially cause problems during a fire. Fire hydrants that have a residual pressure of 20 psi should not be used by fire pumpers. Hydrants that have a low residual pressure shall be either painted or indicated with tags or flags to indicate that they should not be used by the local fire department. The Waterworks shall mark the low pressure hydrants and notify the fire chief of

their locations so they aren't used during emergencies. The deadline for this corrective action is **September 29, 2023**.

- According to the 2022 cross connection survey annual summary report submitted by the Waterworks, there are 2 residential, 2 public authority, and 1 multi-family customer that is non-compliant and has been carried over from previous years. It is the Waterworks' responsibility to have provisions for denial or discontinuance of water service, after reasonable notice, to any premises where an unprotected cross connection exists or where a survey could not be conducted due to denial of entrance. The Waterworks shall address the non-compliant customers or being the process of discontinuing service. The deadline for this corrective action is **December 29, 2023**.

- The private well ordinance for the Village states that permits for private wells are valid for 10 years before the permit needs to be reissued. Section NR 810.16(2), Wisconsin Administrative Code, states that private well operation permits are valid for 5 years at maximum before they can apply for reissuance. The Village's ordinance shall be updated to reflect this. The deadline for this corrective action is **May 31, 2026**.

Recommendations

During the course of the sanitary survey, 4 recommendations were identified. Recommendations are problems in the water system that hinder your public water system from consistently providing safe drinking water to consumers.

Recommendation
1. The paint on the outside of the Tower looks inadequate and unclean with apparent corrosion.
2. The source capacity is not adequate to meet current and future demand.
3. Measures have not been taken to enhance the security of the water supply system.
4. The unaccounted for water is not < 10%.

Discussion of Recommendations:

- The exterior of the Tower is showing multiple points of corrosion. While the Tower was painting in 2015, it appears that the painting was done inadequately for the longevity of the Tower. The Department recommends that Tower is sand blasted and repainted so that the Tower is adequately protected for the long term.

- It is common engineering design that public water systems have enough source capacity to supply the average daily demand while the largest well is out of service. Additionally, wells should not be run more than 12 hours per day to meet the average daily demand (ADD), nor more than 18 hours per day for the maximum daily demand (MDD) with the largest well out of service, as well as having enough emergency power to supply enough water to the system during a power outage.

Currently, the Department has determined that your water system does not have enough source capacity to meet all of the above requirements. Using information from the submitted electronic monthly operating reports, the Department estimates that with Well 2 being offline and only Well 1 available it would take Well 1 about 22 hours to meet MDD. The Department recommends that the Waterworks pursue additional auxiliary power at Well 2 or bringing Well 2 back to be fully online.

- Cyber-attacks have been striking critical infrastructure across the United States with increased frequency, including attacks to public water systems. In the near future, the Department will be reviewing cybersecurity practices as part of the sanitary survey inspection process. In the

interim, the Department recommends the Village evaluate the existing cybersecurity practices and make improvements to reduce vulnerability to cyber-attacks. Consider using the following resources to determine if improvements can be made to the Waterworks' existing system:

- The U.S. EPA [Water Cybersecurity Assessment Tool and Risk Mitigation Plan](#) can be used to assess your existing cybersecurity practices and provides a risk mitigation plan.
- The U.S. EPA offers [cybersecurity technical assistance for water utilities](#) to help water systems improve their cybersecurity practices.
- Additional information and resources on water system cybersecurity can be found at the U.S. EPA [Cybersecurity Webpage](#).

• Based on data provided in the annual PSC report prepared by the Village, the Waterworks has been experiencing water losses over 30% for the past few years. The 2022 PSC report had water loss reported at 36%. The Department recommends the Waterworks investigate and identify the possible sources of unaccounted water and develop measures to reduce the water loss. The Waterworks believes there might be unidentified leaks in the Village that haven't bubbled up. The Department recommends the Village work towards investigating where these potential leak are and repair the water main or services that are leaking.

Non-conforming Features

During the course of the sanitary survey, 4 features that met code requirements at the time of your public water system's construction, but would not be allowed in the current code were discovered. These are referred to as "non-conforming features." Though you are not required to correct these non-conforming features at this time, they will need to be corrected when any major work is done in the future.

Non-conforming Deficiency
1. The floor drains at Wells 1 and 2 are not adequately constructed.
2. The required entry point sample tap is not installed at Well 2.
3. The orthophosphate feed line is not installed appropriately at Well 2.

Discussion of Non-conforming Features:

- The floor drains at Wells 1 and 2 discharge immediately past the exterior wall of their wellhouses. Floor drains that discharge to the ground outside of wellhouses are now required to have the discharge points at least 25 feet from the pumphouse. The next time major work occurs at any of the wellhouses, this may need to be corrected.

- There is no entry point sample tap installed at Well 2. Compliant entry point sampling faucets shall be installed as far downstream of the chemical injection as possible but before the first customers. An optimal entry point sample tap would be attached to a water service lateral that is brought back into the wellhouse. The lateral would be connected to the finished water main just outside of the pumphouse. The next time major work occurs at Well 2, this may need to be corrected.

- The blended phosphate injector at Well 2 is installed in the top half of a horizontal section of pipe. Chemical injectors shall be installed up into the bottom half of horizontal pipes to prevent the chemical from etching and damaging the interior of piping. The next time major work occurs at Well 2, this may need to be corrected.

Water Quality Monitoring and Reporting

Your system has a very good record of compliance with monitoring and reporting requirements. We appreciate your sampler's continued efforts in complying with these Safe Drinking Water Act requirements.

A review of Department records shows a good history of bacti sampling for the last 3-year period. For the Theresa water system, 2 samples are required from the distribution system each month. Records show that these samples have been collected. The required number of quarterly raw samples have also been reported. No coliform positive samples were reported. As required, the coliform bacti samples from the distribution system are collected throughout the month at different locations within the system.

To satisfy the remaining 2023 monitoring requirements, monthly coliform samples are required from the distribution system. Quarterly raw bacti samples are required at all wells. A disinfection byproduct sample is required in the third quarter from the distribution system at the required sample location that has been approved by the Department. Lead and copper samples from 10 locations within the distribution system are required between June 1 and September 30. Lastly, quarterly PFAS samples are required from the entry points at the wells starting in the second quarter. All samples must be collected in the appropriate monitoring period and sent to certified labs for analysis. The labs must then report the results electronically to the Department.

Lead and Copper Monitoring

You are encouraged to have processes in place for flushing your water system anytime the water remains stagnant for an extended period of time, but do not perform fixture or facility-wide flushing prior to a lead and copper sampling event. Flushing of lines within six hours before sample collection is not allowed by the Lead and Copper Rule. Homeowners are advised to remove and clean aerators on a regular basis, but not prior to collecting lead and copper samples. Pre-stagnation flushing is not allowed. Samples should be collected under typical conditions, after water sits for at least six hours.

I have reviewed your system's lead and copper monitoring site plan that was last approved by the Department on January 19, 2023. The Waterworks currently has 13 active sites listed as Tier 3.

The Federal Lead and Copper Rule Revisions (LCRR), which went into effect December 16, 2021, will require all public water systems to develop and submit to the Department a service line material inventory by October 16, 2024. The Department encourages water systems to prepare for this upcoming LCRR deadline by improving their current lead and copper materials inventory. LCRR compliant materials inventories shall include information for all service lines connected to the public water system distribution system, including residential and non-residential customers. This means that inventories shall list both the public and private service line materials and categorized them as one of the following:

- Confirmed lead
- Confirmed non-lead
- Lead status unknown
- Galvanized requiring replacement (GRR) - private-side galvanized service lines must be assigned this category unless the public water system knows with certainty that the upstream utility service line material is not currently and was never previously lead

In addition to the above classification, the public water system must identify the source of the information used for every service connection to make the classification (record type, visual inspection, etc.) and provide a locational identifier. Public water systems shall need to review and track all relevant historical records for the water system prior to their initial 2024 inventory submittal.

After the initial deadline of October 16, 2024, public water systems must continue to improve their LCRR materials inventories and submit annual updates to the Department until all "lead status unknown" services are confirmed to be lead, non-lead, or GRR, and all lead and GRR lines have been replaced. Additionally, the materials LCRR materials inventory must be made public accessible.

Required Reports, Records, and Utility Programs

Our records show that the Waterworks has been distributing the required Consumer Confidence Reports (CCRs). All reports were completed and it appears that the reports were properly distributed. The certification forms were also sent to this office. The CCRs and certifications must continue to be distributed and submitted to the Department before July 1 and July 10 of every year, respectively. Please continue to send me your copies of your final reports and completed certification forms. The 2022 CCR and certification was received on March 30, 2023.

Electronic monthly operating reports are required to be submitted to the Department on or before the tenth day of the following month. In the last year, one report was submitted late.

Well 2 is currently under an EWAA between the Village and the Department due to combined radium concentrations above the maximum contaminant level. The current EWAA was signed on March 10, 2021 and will expire five years after the date of signature. When this happens, the Waterworks will need to decide either to re-sign the agreement, address the combined radium concentrations in the well, or permanently abandon the well.

A review of the Waterworks' hydrant and valve exercising program shows that the Waterworks is doing a good job with both programs. System hydrants are required to be exercised once every 2 years and valves are required to be exercised once every 2 to 5 years. The Waterworks reports that they flush and exercise their hydrants and valves annually. Good records are kept of both programs.

Annual cross connection inspection reports are submitted to the Department by March 1. These reports show how many cross connection inspections were completed within water systems in the previous year. I received the report for the Waterworks for the 2022 inspections on February 2, 2023. Residential customers are on a 10-year inspection frequency. Non-residential customers are on either a 2-, 6-, or 10-year inspection frequency. In the 2022 report, 63 residential, 6 commercial, 1 industrial and 3 public authority customers were inspected. Please continue to conduct cross connection inspections within their inspection frequency and report the number of inspections done in the annual summary report.

Certified Operator

The Waterworks must employ at least one person that is a Grade 1 certified operator in Distribution (D) and Groundwater (G). A Grade T certification indicates operator-in-training status and successful completion of a written exam. Grade 1 indicates successful completion of Grade T requirements plus 1 year of satisfactory experience in the subclass. An operator-in-training is given Grade T status until proper experience is obtained and reported. An operator-in-charge must have Grade 1 in all applicable subclasses for the Waterworks. The Waterworks must designate the operator-in-charge. To maintain their certification, all operators must attend continuing education classes and submit certification experience forms to the Department.

Our records indicate that Corey Clark is the operator-in-charge. Corey is certified in D and G and his certification is good until May 1, 2024, when he will need to renew with a proper number of continuing education credits. Our records show that Dean Groleau is also listed as an operator for the system.

Water System Security

We recommend that you conduct a daily security check of your entire drinking water system to ensure doors are locked and windows secured.

Cyber-attacks have been striking critical infrastructure across the United States with increased frequency in recent years. The following best management practices can be made to prevent a cybersecurity incident:

1. Update the latest version of the operating system (e.g. Windows 10)
2. Use multiple-factor authentication to access critical applications.
3. Use strong passwords to protect remote access credentials.
4. Update user access lists to critical programs regularly (e.g. Employee retires)
5. Train users to identify and report attempts at social engineering. Identify and suspend access of users exhibiting unusual activity.
6. Ensure anti-virus, spam filters, and firewalls are up-to-date, properly configured, and secure.

7. Audit network configurations and isolate computer systems that cannot be updated.
8. Only use secure networks and consider installing a virtual private network (VPN).
9. Restrict all remote connections to SCADA systems, specifically those that allow physical control and manipulation of devices within the SCADA network. One-way unidirectional monitoring devices are recommended to monitor SCADA systems remotely.

System Summary Information

A water system summary is attached. Please review for accuracy. If there are changes that need to be made, contact Sophia Stevenson at (608) 576-4934.

Capacity Development Evaluation

This sanitary survey serves as an evaluation of the capabilities of your water system. This system has been determined to have adequate technical, managerial, and financial capacity to provide safe drinking water. The ability to plan for, achieve, and maintain compliance with applicable drinking water standards has been demonstrated.

The next sanitary survey of your system is scheduled to take place in 2026. You will be contacted prior to the survey to schedule a date that is convenient for you.

Required Action

Please respond by **July 30, 2023** with notification that all deficiencies have been corrected, or that you agree to correct the deficiencies identified in this letter by the due dates, or with alternative dates for correcting these deficiencies. Failure to respond to this letter by **July 30, 2023** may result in enforcement activities.

Within 30 days of correcting each significant deficiency, please provide written notification to Sophia Stevenson of the date each correction was completed. This notification can be sent via email, or regular mail. If using regular mail, the postmarked date will serve as the date of your notification. Failure to provide this notification within 30 days of correcting each significant deficiency will result in a violation. Please also consider correcting the non-conforming features and recommendations discussed in this letter.

Thank you for your assistance during the sanitary survey. If you have any questions, you can reach me by phone at (608) 576-4934, by e-mail at sophia.stevenson@wisconsin.gov, or by postal mail at the address on this letterhead.

Sincerely,



Sophia Stevenson
Public Water Supply Engineer

cc: Bureau of Drinking Water/Groundwater - DG/5
Corey Clark – Director of Public Works; Village of Theresa

San Survey Pre-Survey Report - THERESA WATERWORKS (11401544) MC

Water System Summary Information

PWS ID	PWS Name	County	PWS Type	Popn (Non-Trans)	Svc Connects	Owner Name	Owner Address	Owner Phone	ERP Complete Date	ERP Last Updated	Emerg Phone
11401544	THERESA WATERWORKS	Dodge	MC	1262	569	THERESA VILLAGE CLERK - BECKY TELLIER	THERESA WI 530910327	(920) 488-5421			(920) 212-0484

Certified Operators

Operator Name	License #	License Expire Date	Email Address	Phone #	Fax #	Address	Subclasses	OIC Role
Corey J Clark	37558	5/1/2024	CCLARK10@ALUMNI.UWOSH.EDU	(920)488-4003		1216 SCHOOL ST LOMIRA, WI 53048	D1 - DISTRIBUTION GRADE 1, G1 - GROUNDWATER GRADE 1	Y
Dean P Groleau	33779	11/1/2025	deangroleau@gmail.com	(262)707-9366		118 CONGRESS DR WEST BEND, WI 53095	D1 - DISTRIBUTION GRADE 1, G1 - GROUNDWATER GRADE 1, V1 - VOC REMOVAL GRADE 1	N

Affiliations

Name	Affiliation	Address	Email	Primary?
Sophia Stevenson	DNR_REP	3911 FISH HATCHERY RD FITCHBURG WI 53711	sophia.stevenson@wisconsin.gov	Y
Corey J Clark	EMERGENCY	202 S MILWAUKEE ST PO BOX 327 THERESA WI 53091	theresadpw@gmail.com	Y
Theresa Village Clerk - Becky Tellier	OWNER	202 S MILWAUKEE PO BOX 327 THERESA WI 53091-0327	voftheresa@gmail.com	Y
Theresa Village Clerk - Becky Tellier	PLAN_CON	202 S MILWAUKEE PO BOX 327 THERESA WI 53091-0327	voftheresa@gmail.com	Y
Corey J Clark	SAMPLER	202 S MILWAUKEE ST PO BOX 327 THERESA WI 53091	theresadpw@gmail.com	Y

Affiliation Phone

Name	Phone	Phone Type	Primary Phone?
Corey J Clark	(920) 488-4003	BUSINESS	Y
Corey J Clark	(920) 212-0484	CELLULAR	N
Corey J Clark	(920) 488-2068	FAX	N
Sophia Stevenson	(608) 576-4934	CELLULAR	Y
Sophia Stevenson	(608) 275-3338	FAX	N
Theresa Village Clerk - Becky Tellier	(920) 488-5421	BUSINESS	Y
Theresa Village Clerk - Becky Tellier	(920) 488-2068	FAX	N

Entry Points and Sources

Source ID	Source Name	WUWN	Status	Available Desc	Type	Water Source	Depth (ft)	Cased (ft)	Grouted (ft)
1	WELL 1	BF631	Active	Permanent	ENTRY PT/SOURCE	Groundwater	106	84	50.7
2	WELL 2	BF632	Active	Emergency	ENTRY PT/SOURCE	Groundwater	875	320	320

Entry Points and Sources - Additional Information

Source ID	Well Constr Date	Aquifer	Case Height (ft)	Case Size (in)	Cap Seal Type	Variance?	Variance Reason	Abn Approval Agreemt Date	Original Constr Yr	Prev WUWN
1	1/1/1954	Sand & Gravel		10		N				
2	6/29/1966	Sandstone		12		N		3/10/2021		

Entry Points and Sources - Pump Information

Source ID	Pump Type	Pump Make	Pump HP	Capacity (gpm)	Discharge Type	Pump Last Pulled Date	Aux Power?
1	SUBMERSIBLE	Grunfos	25	300	ABOVE_GROUND		Y
2	SUBMERSIBLE	Christensen	75	400	ABOVE_GROUND	5/17/2023	N

Storage

ID	Status	Desc	Sub Type	Volume (gal)	Firm Pump Cap (gpm)	Overflow to Ground (ft)	MSL Overflow Elevation (ft)	Aux Power?	Manufacturer	Model	Chem Inject Capable?	Active Date
C1	Active	ELEV TANK - S side	ELEVATED TANK	200000			1121	No	Phoenix	Pedestal	N	1/1/1960

Storage - Additional Information

ID	Interior Last Painted	Exterior Last Painted	Interior Last Inspected	Inspect Type
C1	8/19/2015	8/19/2015	08/19/2015	

Booster Stations

ID	Component Description	Component Sub Type	Status	Firm Pump Capacity (gpm)	Aux Power?	Storage?	Chemical Addition?	Active Date
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System Interconnects

Component ID	Component Description	Component Sub Type	Status	Capacity (gal)	Metered?	Chemical Injection Capable?	Active Date
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Treatment

ID	Treatment	Objective	Begin Date	Pump Model	Capacity (gpm)	Stroke %	Speed %	Solution Tank Cap (gal)	Dilution Ratio
1	421 - Hypochlorination, Post	D - Disinfection	1/1/1960	Walchem EZB11D1-VCA	12	40	55	55	0
1	447 - Inhibitor, Polyphosphate	C - Corrosion Control	1/1/1960	LMI A171-150S	10	40	45	50	0
2	421 - Hypochlorination, Post	D - Disinfection	1/1/1960	Pulsatron LPB3SA-VHC9-XXX	12	70	55	50	0
2	447 - Inhibitor, Polyphosphate	C - Corrosion Control	1/1/1960	LMI A171-150S	10	40	60	50	0

System Evaluation Summary

Inspector/Reviewer	Date	Report Date	Type	Agency	Response Due	Response Rec'd
STEVENSON, SOPHIA	5/16/2023		SURVEY	DNR		
STEVENSON, SOPHIA	10/8/2020	12/9/2020	SURVEY	DNR	1/23/2021	

Bacteriological Sampling History

Year	Distribution Safe	Distribution Unsafe	Confirmed Unsafe	Triggered Unsafe	Missed Samples	Raw Water Safe	Raw Water Unsafe	Fecal Positive?
2023	12					4		N
2022	24					8		N
2021	24					8		N
2020	24					8		N
2019	24				2	8		N
2018	24					8		N

Chemical Sampling History

Year	Sample Group Code	Source ID	Samples Taken	Missed Samples	MCL Violations
2023	IOC	1	1		
2023	IOC	2	1		
2023	SOC	1	1		
2023	SOC	2	1		
2023	VOC	1	1		
2022	NITRATE	1	1		
2022	NITRATE	2	1		
2022	VOC	1	1		
2021	DBP		1		
2021	NITRATE	1	1		
2021	NITRATE	2	1		
2021	VOC	1	1		
2021	VOC	2	1		
2020	DBP		1		
2020	IOC	1	1		
2020	IOC	2	1		
2020	IOC		1		
2020	PBCU		10		
2020	RAD	1	1		
2020	RAD	2	2		
2020	VOC	1	1		
2020	VOC	2	1		
2019	DBP		1		
2019	NITRATE	1	1		
2019	NITRATE	2	1		
2019	VOC	1	1		
2019	VOC	2	1		
2018	DBP			1	
2018	NITRATE	1	1		
2018	NITRATE	2	1		
2018	VOC	1	1		

Sample Group	Last Sampled
BACTI	2023

Sample Group	Last Sampled
DBP	2021
HAA5	2022
IOC	2023
NITRATE	2022
PBCU	2020
PFAS	2023
RAD	2020
SOC	2023
TTHM	2022
VOC	2023

Bacti MCL Violations

Source ID	Violation Code	Violation Start Date	Violation End Date

Chemical MCL Violations

Source ID	Contaminant	Contam Description	MCL	Units	Violation Start	Violation End	Continuing Operation?

Deficiencies From Last Survey

Severity	Description	Code Citation	Compliance Due	Compliance Achieved	Actions Taken	Observations	Location
Significant	Past inspection deficiencies have not been corrected as required.	810.13(1) (d)					
Deficiency	The proper testing equipment for chlorine is not calibrated.	811.48(3), 810.03					
Deficiency	Hydrants with insufficient flows have not been color coded or tagged.	810.11					
Deficiency	The Waterworks is not implementing a comprehensive Cross-Connection Control Program.	810.15(1)					
Deficiency	The Waterworks is not implementing a comprehensive Private Well Abandonment / Permitting Program.	810.16(2)					