February 12, 2013

Dear Public Water System Purveyors:

SUBJECT: JANUARY 1, 2014 PHOTO DOCUMENTATION REQUIREMENTS FOR RESPONSES TO SANITARY SURVEY SIGNIFICANT DEFICIENCIES

This letter is to inform you of the Safe Drinking Water Branch’s (SDWB) policy change in acceptable responses to significant deficiencies identified during a sanitary survey. Effective January 1, 2014, photo documentation response to all corrected significant deficiencies is required. The SDWB will continue to reserve the right to conduct follow-up inspections as necessary. This change is effective for all regulated drinking water systems inspected under either the Ground Water Rule or the Surface Water Treatment Rule.

The format for photo documentation can be as simple as an e-mail response from the water system with clearly labeled photos, a formal letter with photos of corrections attached, or some other similar format. Before and after photos are not required but are appreciated. This informal policy has historically helped both SDWB and water system staff by eliminating the need for follow up visits (in between surveys) by the SDWB, which requires remobilization of limited staff resources on both sides. Photo documentation of significant deficiency corrections takes the operator but a few seconds immediately following the correction ("recommendations" can be done in this way too) with the photos subsequently emailed or printed out by the PWS point of contact for submittal to the SDWB. This policy is being made formal to ensure uniform application statewide and to clarify the requirements for photo documentation.

The SDWB will be using calendar year 2013 to get the word out to water systems of this requirement via this letter, the circuit riders and the March issue of The Water Spot. The circuit riders, Rural Community Assistance Corporation’s (RCAC) Mr. Kevin Baughman and Ms. Joy Ganncon and Hawaii Rural Water Association’s (HRWA) Mr. Jim Watts, Ms. Mahana Gomes and Ms. Jill Parker, were briefed on this policy last month.

If there are any questions, please call Mr. Michael Miyahira, SDWB Engineering Section Supervisor at (808) 586-4258.

Sincerely,

JOANNA L. SETO, P.E., CHIEF
Safe Drinking Water Branch

MM: cb

c: Ms. Theresa McGeehan-Takie, East Hawaii EHS [via email only]
Sanitary Survey Inspectors