Comments, and Responses to Comments, on the Draft Report of the Data Verification of West Virginia's Drinking Water Program

Draft Report: September 23, 2005
Final Report: February 8, 2006

Comment: Page iii, Third paragraph:

West Virginia requires all of its PWSs to employ disinfection. WVDHHR's schedule for sanitary surveys is every 3 years for surface water and ground water under the influence of surface water (GWUDI) CWSs, and every 5 years for all other systems, except transient & non-transient non-community ground water systems which are every 10 years.

Response: Report revised to reflect this comment.

Comment: Page ix, Table 3C, Column F, Line 3:

Under the columns for Discrepancies, Column F, the title words under the F has a copyright symbol inserted before the " - D)". Please correct. This copyright symbol also appears in Column F of Tables 3D through 3F.

Response: Corrected.

Comment: Page 1, Section I, Paragraph 1, Line 1:

You have written, "During the week of April 18, 2005 the ...". Please correct the date and change it from April 18, 2005 to "July 11, 2005" to read, "During the week of July 11, 2005 the ..." .

Response: Corrected.

Comment: Page 1, Section I, Paragraph 1, Line 4:

You have written, "... in the West Virginia Department of Environmental Protection, Bureau of Water Supply and Wastewater Management, Division of Drinking Water

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Management (WVDHHR)". Please correct the West Virginia department name and make it consistent with page i, Section I, Paragraph 1.

Response: Corrected.

Comment: Page 1, Second paragraph:

Needs rewritten. Central Office is located in Charleston (not Harrisburg), we have 5 District Offices (not 24 Regional Offices), and we do not have four County Health Districts.

Response: Corrected.

Comment: Page 2, Section II, Paragraph 1, Line 2:

You have written, "... systems in SDWIS/Fed as of April 8, 2005." I believe it should read, "... systems in SDWIS/Fed as of July 6, 2005."

Response: Corrected.

Comment: Page 2, Section II, Paragraph 1, Line 2:

You have written two sentences that read, "That inventory consisted of 2,126 active CWSs, 1,210 active NTNCWSs, and 6,524 active TNCWSs. From that inventory, 36 CWSs, 20 NTNCWSs, and 12 TNCWSs were randomly selected for review." The numbers in these two sentences appear to be incorrect. Please correct as necessary and make consistent with the numbers in Table 1 on page ii.

Response: Corrected.

Comment: Page 2, Last paragraph:

Data entry is performed by State personnel, <u>not</u> a contractor. We receive approximately 70% of bacteriological tests (Total Coliform Rule) via electronically, and the remainder (30 % bacteriological, 100% chem/rads) in paper form.

Response: Text revised to reflect this comment.

Comment: Page 3, First paragraph:

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Currently, WVDHHR retains paper copies for 12 years on site. There is no provision to move them to a state records center. If a system becomes inactive for more than a year, the entire inactive file is sent to a retention center. Correspondence and related material including monthly operational reports and FBRR are primarily maintained at the Central Office; however, these same records may be located at our district offices.

Response: Text revised to reflect this comment.

Comment: Page 3, Next to last paragraph:

For Phase II/V contaminants, the laboratories forward all results to the WVDHHR ~~Compliance and Enforcement~~ Data Management section where results are ~~reviewed~~ entered into SDWIS/State. Compliance and Enforcement will run a report for potential increased frequency on a routine basis, and notify systems with detections via a letter of the need for increased sampling.

Response: Text revised to reflect this comment.

Comment: Change vew to few (in the last sentence of the above paragraph).

Response: Corrected.

Comment: Page 4:

Third Paragraph: The return to compliance code is SOX (not SOC).

Response: Corrected.

Comment: Page 5, Second paragraph:

Not quite accurate. WVDHHR has issued and reported some PN violations to SDWIS/Fed, but not on a consistent basis. WVDHHR began consistently issuing and reporting violations in early 2005.

Response: Text revised to reflect this comment.

Comment: Page 5, Third paragraph, next to last sentence:

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…as DTF Writer which is used for traditional updates is not compatible with Microsoft Windows XP, the standard operating system of WVDHHR ~~the ODS/CDX system..~~

Response: Text revised to reflect this comment.

Comment: Page 5, Last paragraph of Section III, Line 3:

You have written, "Also, the WVDHHR does not get feedback regarding the quality of data sent to the new CDX system." Please add a subsequent sentence that reads, "It should be noted that after the data is sent thru the new CDX system, and it is processed and inserted into the new Operational Data Storage (ODS), WVDHHR will automatically receive error reports via the new CDX system."

Response: Text revised to reflect this comment.

Comment: Page 5, Section IV, Subsection A, Paragraph 1, Line 3:

You have written, "The Inventory Core Data Set is divided into three primary groups:". However, in the bullets below your statement, you have listed only two primary groups. Please make it consistent.

Response: Corrected.

Comment: Page 8, Recommendations:

Recommend deletion concerning the Sanitary Surveys. There is no discussion of Sanitary Surveys in this section, and the Recommendation is made in the Sanitary Survey section.

Response: Text revised to reflect this comment. Recommendation deleted.

Comment: Page 9, First Paragraph:

WVDHHR conducts sanitary surveys on all non-community systems with a ground water source (TNCWS & NTNCWS) on a ten year frequency.

Response: Text revised to reflect this comment.

Comment:

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WVDHHR disagrees with the recommendation that all Sanitary Surveys be conducted at least every 5 years. 40 CFR 141.21 (d) states "Thereafter, systems must undergo another sanitary survey every five years, except that non-community water systems using only protected and disinfected ground water, as defined by the State, must undergo subsequent sanitary surveys every ten years…." (emphasis added). Our regulations require that all ground water systems must be disinfected, and when analysis has determined that the source is not GWUDI, the source is deemed "protected" by WVDHHR (the State).

Response: Recommendation revised to reflect this comment. Discrepancies relating to this issue have been removed.

Comment: Page 14, Third recommendation:

Enforcement and Compliance section in Central Office validates Phase II/V and nitrate/nitrite violations, not field staff.

Response: Text revised to reflect this comment.

Comment: Page 16, Section X, Subsection B, Fourth Paragraph, Line 1:

You have written, "The Stage 1 DBPR findings are summarized in Tables 3A - 3G of ....". Should it read, "...Tables 3B - 3G of ..." instead?

Response: Corrected.

Comment: Page 17, Last paragraph:

Central Office has been making compliance determinations since the initial implementation of the lead and copper rule. Third sentence should be revised accordingly.

Response: Text revised to reflect this comment.

Comment: Page 18, Second Paragraph:

Due to the change from manual compliance to automated compliance in 2005, WVDHHR recommends changing the first sentence: "….the state ~~does~~ will not routinely review the 90th percentile results."

Response: Text revised to reflect this comment.

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Comment: Page 18, Third paragraph:
"… the responsible ~~District Office~~ Compliance Officer may contact the system by phone, and it will mail the system a letter that outlines the steps to be followed after the ALE, including a timetable for completion and ~~a link to the EPA Web site for examples~~ a sample of what might be used for public education language.

Response: Text revised to reflect this comment.

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