Task 2.1.1.a: EOY comment (on-going) conflicts with mid-yr comment (completed). Have you begun more training for this task since your mid-yr report? Please clarify.

We had trained staff to interpret and review monthly operating reports (MORs) for the SWTR and the key person left. We then needed to train others and also filled that position so another person needed training.

Task 2.1.1.g: Please refer to the last Data Verification Report dated 10/11/02. Specifically, page 8; Philippi Dist. Ofc had discrepancies regarding inconsistent PWSIDs for water sources. State comment should reflect progress for correcting these discrepancies.

In our old system (maybe prior to 1998-1999) when an inactive water system was reactivated, it was assigned a new PWSID number. That process was changed and now when an inactive water system is reactivated, it will receive its original PWSID number. The district office initiates the reactivation or issuance of a PWSID number. The district offices should be aware of inactive systems and if the inactive system starts operation again, the district office should identify to the central office the PWSID number to become active. This should help to keep from issuing a new PWSID number to an inactive system.

No administrative contact- This should be caught in a data submission to SDWIS-Fed, we must have an active administrative contact or the water system will be considered a Non-Public water system.

Ownership type not identified - This is not a required field in SDWIS (optional), thus this error will typically not be caught.

Task 2.4.1: Please add to your comment the number of cws, ntncws and ncws for which sanitary surveys have been completed for 2004.

The sanitary survey report for Fed FY is 120 Community, 26 Transient, and 21 Non- transient systems.

Task 2.5.2: Please revise comment to reflect date final FY'05 grant application was submitted to EPA.

Our letter was dated May 21, 2004.

Task 4.3: Please clarify if cross connection course is 36- hour (per midyr report) or 40-hour (per eoy report).

The cross connection course is a 40 hour course that includes 4 hours for testing.

Commentary is needed on your progress for filling vacancies. Please fill free to mention any difficulties in doing so (e.g., budget, no applicants, industry competition, etc.).
I was just going over your organization chart and it looks like you've reorganized a bit. Can you also discuss your decision to reorganize (the who, what, when and why's) and how affective it has been? We can discuss further if necessary.

We have been working on filling vacancies as they have developed. Of course, when Vic Wilford retired, that position went through the process of being filled and it was officially filled on

September 1, 2004. Troy Wills and Linda Keller both of the Regulatory and Compliance section left and then we reviewed that unit to decide if it was working as efficiently as we would like. The thought was that if we merge the compliance and enforcement group with the district office group, this would help with the interaction of these two groups. We believe that these two groups working together will improve the compliance and enforcement actions that we take on water systems. Instead of filling the Engineer IV position that Troy Wills held, we created an Engineer III position under Bob Hart that would supervise the Compliance group and be an assistant to Bob with the district offices. The position that Linda Keller held was advertised, candidates were interviewed and one has been selected and we expect to be able to fill the position in January. Charles Robinette has taken over many of the duties that Linda Keller worked upon concerning administration of SDWIS. Russell Hicks previously reported to Troy Wills and since Russell really does work for the entire division, we thought that he should report to the director. We have had candidates to fill most of the positions in the central office. We have two positions in district offices that we have had some difficulties with filling. Economic issues mostly the reason. We have posted several times and each time that we do not receive an appropriate candidate, we have posted at a lower level of classification. Engineer classification then Engineer-in-training classification and now we are going to post as Engineer Technician classification. If that doesn't work, we will go through the process again.

A couple of issues have been brought to my attention concerning your lab certification program. I understand you have lost key personnel for chemistry certification and that you haven't received any requests from commercial labs to certify or accredit TOC or SUVA analysis.

1) How are you handling analysis for TOC or SUVA at present and what plans do you have for certifying analysis in the future?

With TOC & SUVA - "certification" is not required. In accordance with 141.131 (d): alkalinity, Bromide, TOC, SUVA and pH can be done by a party "approved" by the State. We normally have our district engineer to observe the water operators perform the testing to make sure the test is performed correctly. A certified lab must be used for TTHM, HAA5, Chlorite and Bromate, and the State can also approve a party to perform chlorite at the entry point to the distribution system.

2) Will you be able to have key personnel in place for your next schedule of assessments? If not, how do you plan to proceed with on-site organic audits?

The Office of Laboratory Services states that they do have adequate personnel to proceed with any organic on-site audits.

2a) If your consultant assists you on-site, do you foresee his unfamiliarity with EPA's methodology a problem in making sure the audits are thorough and efficient?

The Office of Laboratory Services' consultant will be used mainly to verify operation of specific instruments rather than use of methodology.