

2021 Annual Capacity Development Program Report

State Fiscal Year 2021
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Department of Environmental Protection
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Introduction

The 1996 Amendments to the Federal Safe Drinking Water Act (SDWA) focused on promoting the technical, managerial, and financial (TMF) capacity of public water systems to comply with the National Primary Drinking Water Regulations. These amendments also required states to prepare an annual report documenting the ongoing implementation of the Capacity Development Program to address capacity determinations for new systems and the application of an approved strategy for existing public water systems.

In the 1996 amendments to the SDWA, Congress ensured that each state would establish a Capacity Development Program by tying program requirements outlined in Section 1420(a) and (c) to the Drinking Water State Revolving Funds. In accordance with Section 1420(a) of the SDWA, the New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A) was amended on August 2, 1999 (P.L. 1999 Chapter 176) to establish the legal authority to assure that all new community and nontransient noncommunity water systems demonstrate adequate technical, managerial and financial capacity. The New Jersey Department of Environmental Protection (Department) subsequently adopted regulations at N.J.A.C. 7:10-13, which established the requirements to assure that all new public community and nontransient noncommunity water systems have adequate capacity. In addition, the Department developed and implemented a Capacity Development Strategy (Section 1420(c)) to assist existing systems with developing and maintaining capacity. The United States Environmental Protection Agency (USEPA) approved the Department's first Capacity Development Strategy on September 28, 2000, which was subsequently updated in 2009 and 2013, with minor updates in the recent years. If the Department had failed to obtain legal authority to ensure that new water systems demonstrate technical, managerial, and financial capacity, or had not implemented a Capacity Development Strategy, the Department would have received only 80 percent of its Annual Capitalization Grant allotment from the USEPA (Section 1452(a)(1)(G)). This means that the Department's allocation of funds for the Drinking Water State Revolving Fund (DWSRF) and set-asides would be reduced by up to \$3 to 4 million dollars per year.

This report provides information regarding the activities implemented by the Department's Capacity Development Program during State Fiscal Year 2021 (SFY2021), which covers the period from July 1, 2020 through June 30, 2021. The Capacity Development Program activities included in this report were outlined in the DWSRF Federal Fiscal Year 2020/State Fiscal Year 2021 New Jersey Set-Asides Workplan, which was submitted to USEPA on June 29, 2020.

In SFY2021, the COVID-19 pandemic presented a unique set of challenges for the Department and water systems in the State of New Jersey. New Jersey was initially one of the hardest hit areas in the United States. Restrictions on group gatherings, site visits, and conferences impacted New Jersey starting in March of 2020. Challenges included the transition to a remote work environment, restrictions on in-person training and onsite inspections, and lack of in-person technical assistance.

In SFY2022, the Department intends to perform outreach to stakeholders and adopt a new strategy for the continued implementation of the Capacity Development Program after the completion of this self-assessment. Additionally, the Department will continue evaluating the Capacity Development Program to identify additional ways to improve data management and compliance tracking, develop training and guidance documents, and determine any required rule changes.

Pursuant to Section 1420(c)(3) of the 1996 Federal Safe Drinking Water Act amendments, the Department must also prepare a report to the Governor (Governor's report) on the efficacy of the State's Capacity Development Strategy every three years. The 2020 Governor's report addresses the progress made towards improving the TMF capacity of public water systems during 2018, 2019, and 2020, and was finalized and submitted to Governor Murphy on September 30, 2020.

SFY2021 Implementation Reporting Criteria

A. New Systems Program

1. Has the State's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year?

The New Jersey Safe Drinking Water Act rules (the rules) at N.J.A.C. 7:10-13 require new public community and public nontransient noncommunity water systems to demonstrate TMF capacity to meet Federal and State regulations in effect, or likely to be in effect, upon the start date of water system operations. This subchapter was readopted without change effective March 29, 2017 and will expire March 29, 2024.

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?

There have been no modifications to the Department's control points during SFY2021, which are used by agencies to ensure capacity for new water systems. In accordance with the State's Capacity Development Strategy, the Department continues to use the requirement of construction and operation permits for new community water systems as a control point to ensure safe and reliable drinking water is provided to the public. For newly constructed water systems and newly discovered noncommunity water systems, which are typically found during site visits conducted by County Environmental Health Agency (CEHA) inspectors, the Department requires a TMF Evaluation to determine the water system's capacity. Fewer onsite inspections were conducted in SFY2021 by CEHA inspectors due to the restrictions of the COVID-19 pandemic. This may have reduced the number of newly discovered noncommunity water systems. For a water system to be an

approved water system by the Department, a TMF Evaluation is required, including a description of the water system, an infrastructure replacement plan, compliance with operator certification requirements, well pump test results, a cross-connection control plan, information about the water system's organizational structure, an emergency management plan, a description of water system policies, a capital improvement plan, and various other requirements under N.J.A.C. 7:10-13.

3. *Indicate whether any new water system approved within the past three years under the Capacity Development Program has been on the Enforcement Targeting Tool (ETT) list.*

Appendix I lists those new public community and new public nontransient noncommunity water systems approved by the Department during SFY2019, SFY2020, and SFY2021. There have been zero (0) new community and seven (9) new nontransient noncommunity water systems from the past three fiscal years that are on USEPA'S Office of Enforcement and Compliance's Enforcement Targeting Tool (ETT), updated as of April 2021. Appendix I includes those new community and new nontransient noncommunity water systems, their ETT scores, and information on the assistance that has been, or will be provided, to return the water system to compliance. In many cases, new water systems incur monitoring and reporting violations in the first few years of operation.

B. Existing Systems Program

1. *Regarding the State's approved existing systems strategy, which programs, tools, and/or activities were used, and how did each assist existing public water systems in acquiring and maintaining TMF capacity?*

Programs, Tools, and Activities

The following programs, tools, and activities, as described below, are used for the Capacity Development Program to continue to assist water systems in acquiring and maintaining technical, managerial, and financial capacity:

- Penalty Guidance Policy;
- Operator Certification Program and Training;
- Mandatory electronic reporting requirements for analytical results (most parameters);
- Department's Drinking Water Watch application – this application makes monitoring schedules readily accessible;
- Improved data management;
- Technical, managerial, and financial evaluations and technical assistance; and
- Other activities.

Penalty Guidance Policy

The “Penalty Guidance Policy” is utilized by the Department’s Division of Water Compliance and Enforcement (Enforcement) to assess penalties for water systems that have received violations. Enforcement considers various factors to avoid and/or lessen penalties for each violation issued to the water system prior to returning the water system to compliance. These factors include the severity of a given violation, the level of offense, the type of water system, the seriousness of the violation, the water system’s violation history from the past three (3) years, and the economic benefit the violator has realized the result of not complying or delaying compliance.

Operator Certification Program and Training

The Department uses the Operator Certification Program to promote and sustain knowledgeable licensees capable of operating a water system through the following goals:

- Ensuring that all community and nontransient noncommunity water systems have the appropriate classification of the licensed operator responsible for performing the required duties and responsibilities;
- Assisting with training, certification, and license renewal;
- Reviewing training courses for initial certification and continuing education;
- Making training more available and affordable to operators; and
- Using Federal funds to enhance the program and assure that New Jersey meets USEPA guidelines.

During SFY2021, the Department offered training sessions and seminars for licensed operators that covered various topics, including the maintenance of TMF capacity to comply with Federal and State regulations. The Department worked with training providers to encourage the transition to web-based training seminars due to limitations on in-person training seminars and agreed to accept online versions of previously approved courses for Training Contact Hours (TCHs). Additionally, water operator licensing examinations, previously held three times a year in person, were delayed due to restrictions on gatherings. The Department coordinated with the Association of Boards of Certification (ABC) to enable computer-based exams that are remotely proctored to allow individuals to obtain a license. The Department anticipates continuing with this modality in SFY2022 as it offers more options for testing throughout the year.

The Department maintains a contract with the New Jersey Water Association (NJWA) to provide free training to licensed operators that can be used to obtain continuing education credits for license renewal. The current \$161,000 contract is being finalized. It requires NJWA to provide 70 training sessions in the northern, central, and southern regions of New Jersey during the work period from January 1, 2020 to December 31, 2022.

Due to the COVID-19 pandemic restrictions, the Department is offering compensation for online training sessions at a different rate in lieu of the in-person sessions.

While the contract is geared towards operators and owners of small drinking water systems, representatives from water systems of all sizes are welcome to attend scheduled training. During SFY2021, these sessions covered topics that included asset management and asset maintenance, optimization and maintenance of filtration and process equipment, disinfection equipment maintenance and repair, Incident Command System (ICS) and NIMS, hydrant use and maintenance, confined spaces awareness, application and operation of automatic control valves, underground utility locating, and other topics essential for drinking water operators. A total of 23 training sessions were held, with 553 individuals attending. Feedback from training session participants are utilized to assist the Department with exploring ideas for new training sessions with NJWA for licensed operators.

In addition to the above, the Department continues to contract with Rutgers University to provide 50% tuition subsidies to licensed operators for drinking water related continuing education courses. This contract requires Rutgers University to provide affordable drinking water-related courses to licensed operators at a discounted rate. The contract originally ran from January 1, 2018 to June 30, 2020 and in SFY2021, the Department extended the work period of this contract, with no-cost time extensions, through June 30, 2021. The Department has begun work on a new \$198,000 contract with Rutgers to cover the period July 1, 2021 to December 31, 2023, so that 50% training subsidies can continue to be provided to licensed operators for continuing education courses at Rutgers University.

During SFY2021, 34 training sessions were provided. Some topics covered at these trainings were the Safe Drinking Water Act regulations, customer service skills, distribution system water quality, workplace problem solving and ethics, management for supervisors, emergency and crisis communication, chemistry, microbiology, alternative energy for utilities, background, and treatment of per- and polyfluoroalkyl substances (PFAS) and various other topics for drinking water operators. In total, for this contract, 100 training sessions were held with 1286 drinking water operators in attendance.

In SFY2021, the Department conducted presentations and outreach efforts on the implementation of the Water Quality Accountability Act P.L. 2017, c. 133 (WQAA), enacted in New Jersey to improve the safety, reliability, and administrative oversight of water infrastructure. These presentations and outreach efforts focused on WQAA Annual Certification requirements and current issues the water systems may be facing, as well as options they can use to address them.

WQAA requires public water systems with more than 500 service connections to routinely perform certain best management practices and develop cybersecurity and asset management plans. Several resources have been developed and are available online on

dedicated asset management and WQAA web pages. These include technical guidance, guidance on best management practices and asset management plan development, an FAQ document, and an asset management program checklist. The Department, in close coordination with the partners set forth in the WQAA (i.e., the Department of Community Affairs and the Board of Public Utilities), will continue to develop and update guidance and/or training on asset management planning in SFY2022.

Electronic Reporting, Drinking Water Watch, and Data Management

The Department's internal and external databases and applications are a vital asset of the Capacity Development Program. The *New Jersey Electronic Environmental (E2) Reporting System* is a web-based system designed to accept analytical results submitted by drinking water laboratories on behalf of water systems to meet Federal and State requirements. The Department utilizes the USEPA *Safe Drinking Water Information System (SDWIS)* for compliance determinations based on sampling data being reported. *SDWIS/State version 3.33* is utilized to store data (e.g., sample results, monitoring schedules, and some inventory data) and perform compliance determinations. The Department's web-based application, *Drinking Water Watch*, allows water systems and operators to easily view sampling data submitted through E2, compliance determinations, and violation data. Providing access to this information allows water systems and operators to respond to their test results quickly. In addition, the use of the Department's *Environmental Management System (NJEMS)* is widely used for compiling and maintaining drinking water inventory data, water system information, permitting documents, reporting, and enforcement activities.

In SFY2021, the Capacity Development Program reviewed avenues through which staff may utilize data to more efficiently evaluate a water system's capacity and prioritize systems. Additionally, the Capacity Development Program adapted to the challenges posed by COVID-19 pandemic by updating policies and procedures to function more efficiently in a remote work environment.

Technical Assistance and Technical, Managerial, and Financial Evaluations

The Department provides direct technical assistance to water systems and evaluates TMF capacity of water systems on an ongoing basis. Assistance is provided to those water systems that fail to demonstrate adequate TMF capacity, with the intention of resolving the issues they may face.

The Department routinely provides technical assistance via direct consultation with water systems to comply with existing construction and operation regulations. For this reporting period, the Department provided the following direct assistance to drinking water systems and their operators:

The Engineering Services Contract is a \$400,000 agreement that the Department has with NJWA under which small water systems serving less than 3,300 customers may obtain the services of a Department-approved consulting engineer to assess water system needs and aid with completing Drinking Water State Revolving Fund (DWSRF) applications and submittals. The work done under this contract includes a preliminary asset management assessment, engineer's recommendations, and an evaluation of alternative options. This contract will continue assisting participating water systems into SFY2022 at which point all funds are expected to be expended.

While the Engineering Services contract has been a successful tool for providing small water systems with planning and engineering services leading up to a project that could be funded through the DWSRF program, the contract will be revised based on significant changes that occurred in the DWSRF program beginning in Federal Fiscal Year (FFY) 2018. Because of the success of the DWSRF program over the last few years, the Department has received and funded many more project applications than in previous years. Projects funded through the Engineering Services Contract cannot proceed with the guarantee that funds will be available. Additionally, the Department is evaluating how to better provide assistance to the many small water systems that may need assistance with the engineering and design services but do not intend to fund a project through DWSRF or cannot comply with the DWSRF credit standards. Many of these water systems are managed by the CEHAs, who need assistance providing engineering services and conducting permit reviews. In SFY2022, the Department plans to modify the Engineering Services contract and contract milestones better to serve those water systems in need of its assistance and provide engineering support to the CEHAs.

- Site visits with Department staff, in coordination with Enforcement and CEHAs are typically performed routinely to assist water systems in achieving and maintaining compliance with the rules. However, due to the COVID-19 pandemic restrictions, site visits were placed on hold for the majority of SFY2021, with very limited exceptions. It is expected that site visits will resume in SFY2022. Site visits will continue to be prioritized based on water systems on the Capacity Development Strategy List (explained in detail in Section B.2.) and to provide help addressing water system deficiencies. Appendix II summarizes the status of water systems on the 2019 Strategy List and the assistance performed in SFY2021.
- Evaluations of TMF for those water systems required to demonstrate their capacity for this reporting period were completed through the following channels:
 - An update of the findings, TMF capacity, and current compliance status for water systems on the 2019 Strategy List were conducted. An update on those can be found in Appendix II;

- Federal regulation (SDWA 1452(a)(3)) prohibits water systems from obtaining DWSRF funding for a capital improvement project if the water system does not have TMF capacity. After the Department ranks and prioritizes eligible projects, the water system submits environmental planning documents, engineering planning and specification documentation, and a construction application needed for review. During this process, the Department determines the TMF capacity of its applicants according to N.J.A.C. 7:10-2.7. In SFY2021, the Department funded 38 projects through DWSRF that totaled over \$200M. The assistance provided by the Department for these projects were executed agreements in the form of executed loan commitments, refinanced short-term debt, refinanced long-term debt, and guarantee or purchase insurance; and
- New community and nontransient noncommunity water systems, and transient water systems reclassified as such, must demonstrate TMF capacity. During SFY2021, there were zero (0) new nontransient noncommunity water systems, and six (6) transient noncommunity water systems that were reclassified to nontransient noncommunity water systems due to a population increase. These water systems are required to submit a demonstration of technical, managerial, and financial capacity for review. The Department coordinates with CEHA to follow-up with water systems that fail to submit the required information.

Other Activities

There are other ongoing activities that complement or support the Capacity Development Program. These activities include:

- Maintenance and periodic update of Department's Asset Management Policy website (<http://www.nj.gov/dep/assetmanagement/>);
- Maintenance of an accurate inventory of water systems and the status of violations;
- An ongoing self-assessment of the Department's Capacity Development Program to evaluate and enhance the program. This involves the review of every process associated with the Capacity Development Program, including the development of the Strategy List, the tracking of relevant data and progress, the identification of water systems in need of assistance or development of capacity, training offerings, and forms and processes; and
- In SFY2021, the Department continued coordination with those entities that were re-awarded USEPA Compliance Grant Contracts during this new grant contract cycle: NJWA, RCAP Solutions, the New Jersey Section of the American Water Works Association (AWWA-NJ), and the University of North Carolina Environmental Finance

Center (EFC). The following provides a SFY2021 status update for those awardees of the USEPA Compliance Grant Contracts:

- a. NJWA provides technical assistance to small water systems out of compliance with the SDWA, along with the training sessions for operators and water system owners provided under contract with the Department;
- b. EFC has not provided any trainings during SFY2021. EFC is planning to resume in-person training sessions once COVID-19 restrictions are lifted. The Department is in the process of recommending training topics for future courses; and
- c. RCAP provides training and technical assistance for small public water systems to achieve and maintain compliance.
 - i. Training: RCAP continues to provide training courses for TCH credits and plans to complete the application to become a provider in New Jersey. RCAP has made the transition to webinar bases courses during this time. A half-day workshop that would provide operators with examination preparation on basic math concepts, which is a topic that operators appear to struggle the most with, was held as an online course in July 2020 and August 2020 due to COVID-19 restrictions. A half-day workshop to provide operators with an overview of general chemistry topics found in the water industry was held in January 2021. In addition, RCAP and the AWWA conducted their combined workshop in March 2021 focusing on complying with the Safe Drinking Water Act. For the remainder of the grant contract cycle, RCAP plans on conducting training that will focus on preferred topics such as Board Support for Water Systems, Distribution Water Quality, Source Water Assessment and Protection, Distribution System Infrastructure, and Main Breaks and Cross Contamination, and include some half-day workshops that cover Basic Chemistry, Water Quality in Storage Facilities, and Emergency Response Planning.
 - ii. Technical Assistance: RCAP has continued work on ongoing projects focused on lead and copper sample plans, updates to Operations and Maintenance (O&M) manuals, and asset management planning. During SFY2021, RCAP worked with the Bureau of Safe Drinking Water and the Bureau of Water System Engineering to establish a new lead and copper sampling plan initiative. Through this initiative, approximately forty (40) water systems with insufficient lead and copper sampling plans will receive guidance from RCAP on how to properly complete and submit a lead and copper sampling plan. In addition to the lead and copper sampling plan initiative, RCAP is currently assisting two (2) public water systems to achieve compliance.

The Department assists by providing recommendations for training topics, training locations, and the names of the water systems in most need of assistance. The Department will continue to periodically update USEPA Region 2 on the ongoing coordination efforts with these entities.

2. *How has the State continued to identify water systems in need of capacity development assistance?*

The principal way that the Department identifies water systems in need of capacity development assistance is through the preparations of a Strategy List. The preparation of the Strategy List involves identifying and prioritizing those public water systems most in need of capacity development. The Strategy List enables the Department to prioritize the Program's resources such that it can perform TMF capacity evaluations and provide assistance in order of need. The status of the 25 community and noncommunity water systems on the 2019 Strategy List can be found in Appendix II.

The 2019 Strategy List includes those water systems identified in need of technical, managerial, and/or financial capacity. The Department uses several factors to determine which water systems are in need, including a review of each system's compliance history during the period of 2017 to 2019; a review of violations on the ETT list, focusing on systems with a score of 11 or greater; and, through Department staff recommendations (e.g., referrals due to site visits). Water systems on the list are then assigned priority points based on risk factors such as population, violations, administrative consent orders (ACO) and administrative orders (AO), system classification, and other factors. Using the methods mentioned, seven (7) water systems were carried over from the 2016 Strategy List, and seventeen (17) water systems were newly added. Additionally, water systems identified with water quality or TMF issues after the finalization of the 2019 Strategy List are given the appropriate technical assistance and training needed to help with issues they may be facing.

3. *What was the State's approach in offering and/or providing assistance if Statewide public water systems capacity concerns or capacity needs have been identified?*

The Department approach is reaching out to those water systems on the 2019 Strategy List, as well as additional water systems that need assistance. The capacity evaluations performed for community and noncommunity water systems included on the list helps identify areas where assistance should be focused. These evaluations are performed on an ongoing basis and will continue for a three-year cycle until a new list is drafted. The status of activities for these water systems can be found in Appendix II.

In SFY2021, the Capacity Development Program continued to perform background research; evaluate water system TMF capacity; develop improvement plans; and help water systems implement those improvement plans. Staff have facilitated meetings with water system representatives (e.g., owners, managers, licensed operators, and consulting engineers), regulatory agencies (e.g., enforcement inspectors, compliance managers, and permit reviewers), and representatives from other public water systems to identify and evaluate alternatives and options for developing water system capacity and will continue to perform this effort in the upcoming State fiscal year. The Capacity Development Program uses these coordination efforts and activities to relay information regarding available resources and guidance materials and provided training sessions at numerous locations and forums.

In previous years, the Capacity Development Program conducted site visits as a means to provide direct face-to-face assistance. However, due to the restrictions placed on site visits due to the COVID-19 pandemic, these were placed on hold for the majority of SFY2021, with very limited exceptions. It is expected that site visits will resume in SFY2022.

To improve water system operation, the Department also continues to identify training needs for small water system owners and operators and offer training as noted in the “Operator Certification and Training” section in Section B.1.

Additionally, the Department continues to utilize and review resources and guidance from organizations such as USEPA, the Association of State Drinking Water Administrators (ASDWA), Environmental Finance Centers (EFCs), and WaterOperator.org, to review and consider successful resources and initiatives for building capacity for drinking water systems.

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

The Capacity Development Program continues to review its existing system strategy to identify improvements in the program methods and activities, review the processes used to develop its Strategy List, find potential resources for the regulated community, and create advantageous partnerships with stakeholders to work towards a common goal of ensuring safe and reliable drinking water throughout the State.

To supplement the Department’s ongoing review of program processes, the Capacity Development Program is also considering opportunities to expand the program to promote effective asset management requirements under the Safe Drinking Water Act. More information on asset management is included in #5 below.

5. Did the State make any modifications to the existing system strategy?

Over the last few years, the Capacity Development Program strategy has been modified to utilize a team approach to focus on the water systems on the Strategy List (listed in Appendix II). This approach allows the Department to have individuals work closely with the assigned water systems to provide them with the resources needed to achieve compliance. This approach helps dedicate more attention to these at-risk water systems. This updated approach capitalizes on the diverse expertise of Department staff, with varying backgrounds, experience-levels, and subject matter expertise. This has proved vital in assessing each water system's capabilities, providing different perspectives on which plans of action would be best for a given water system, and establishing a workplan for these water systems in the future. The Department plans on continuing to evaluate this team approach to improve tracking and promote open dialogue and ongoing communication with the water system, especially given the difficulties of a remote work environment and recent staffing changes to the program.

Furthermore, the 2018 amendments to the Federal SDWA made under AWIA (AWIA Section 2012) instruct state capacity development programs to update their existing system strategies to encourage water systems to implement asset management planning and to provide training for water systems on this implementation. States were originally required to demonstrate compliance with these AWIA requirements to USEPA by December 31, 2021. In response to a request for an extension from ASDWA, on September 19, 2021, USEPA extended this deadline a year to December 31, 2022. New Jersey has enacted recent changes in legislation under the WQAA that require many water systems to develop asset management plans. In SFY2021, the Department worked with USEPA to review current asset management activities required under the WQAA and their compliance with the new Federal requirements. The Department intends to revise the 2010 Capacity Development Strategy in SFY2022 and incorporate these asset management requirements into this new strategy. Additionally, the Department intends to continue working with USEPA and the Southwest Environmental Finance Center on this strategy revision.

To further encourage public water systems' asset management planning and provide additional assistance to public water systems with relevant training in implementing asset management plans, the Capacity Development Program reviewed how asset management is incorporated in the existing systems strategy. It assessed the current approach in encouraging drinking water systems to develop asset management planning and reviewed the assistance available to drinking water systems to develop asset management planning.

Currently, asset management planning is required through the following Department activities:

- The Department's Engineering Services Contract
 - Assistance is provided through this contract to help small drinking water systems to compile engineering designs and specifications necessary for a DWSRF loan. Completion of an asset management assessment is a required milestone to participate under this contract, and water systems are provided a subcontractor to help with this assessment.
- Water Quality Accountability Act P.L. 2017, c. 133 (WQAA)
 - As stated previously, this law requires public water systems with more than 500 service connections to routinely perform certain best management practices, such as testing valves and fire hydrants, develop cybersecurity programs, asset management plans, and create a mitigation plan if in exceedance of a certain number of violations within 12 months.
 - The Act requires purveyors to create and implement an asset management plan designed to inspect, maintain, repair, and renew its infrastructure consistent with standards established by the American Water Works Association.
 - Although asset management plans do not need to be submitted to the Department for review, they must be available upon request during an inspection by the Department. Additionally, the WQAA requires annual certification from the highest-ranking official at the water system that an asset management plan has been developed and is being followed.
 - Triennially, public water systems must submit a capital improvement report on infrastructure improvements completed in the previous 12 months and to be completed in the upcoming 12 months and the costs of these improvements. The Department is developing an online portal through which water systems will be able to submit this data. Completion of this portal is expected in SFY2022 and will allow the Department to analyze the implementation of asset management, overall infrastructure age, and infrastructure spending on a Statewide level. This will enable the Department to identify gaps and focus resources where it is most needed.
- Issuance of a DWSRF Loan
 - On, or prior to the date of loan closing, the Borrower must submit to the I-Bank and the Department a certification regarding asset management planning that satisfies the requirement set forth in the "Asset Management Guidance and Best Practice."

In SFY2022, the Capacity Development Program will evaluate and redevelop the existing systems strategy to address effective asset management planning and training that will be of use to drinking water system owners and operators. It will reach out to stakeholders of the program to gain perspective on asset management planning initiatives within the State and how they can improve. It will also continue to make other modifications to

benefit New Jersey's drinking water systems and licensed operators, keeping with the Department's mission statement. Additionally, the Department will continue to utilize and review resources and guidance on innovative ways to incorporate asset management into the Capacity Development strategy from organizations such as the Environmental Finance Centers (EFCs). The Department will continue evaluating the Capacity Development Program to identify additional ways to improve data management and compliance tracking, develop training and guidance documents, and determine any required rule changes.

APPENDIX I

**CAPACITY DEVELOPMENT PROGRAM:
NEW COMMUNITY AND NONTRANSIENT NONCOMMUNITY PUBLIC WATER SYSTEMS
DURING STATE FISCAL YEARS 2019, 2020, AND 2021
WITH
USEPA'S OFFICE OF ENFORCEMENT AND COMPLIANCE'S ENFORCEMENT TARGETING TOOL (ETT) SCORES
(07/01/2018 to 06/30/2021)**

Violations in *italics* have been returned to compliance.

PWSID NO.	SYSTEM NAME	OPERATION START DATE	VIOLATION TYPE	ETT SCORE	STATUS OF ASSISTANCE
Nontransient Noncommunity Water Systems					
NJ1514355	UTA of Lakewood	11/07/2018	<p><i>Other for Public Notice Rule</i></p> <p><i>TT for Lead and Copper Rule (OCCT Study Recommendation)</i></p> <p>MR for Lead and Copper Rule (LCN)</p> <p><i>TT for Lead and Copper Rule (Public Education)</i></p>	13	<ul style="list-style-type: none"> System was referred to the Department's Compliance and Enforcement on 03/25/2020 after the CEHA was unable to obtain the required documents. System failed to distribute public education materials by 08/30/2020. System was returned to compliance for this violation on 02/18/2020 and completed public notice requirements 08/17/2020. Additionally, on 10/09/2020, system was returned to compliance for failure to post Tier 2 Public Notice associated with their failure to distribute public education materials. System has been returned to compliance for failure to submit an optimal corrosion control treatment recommendation and a source water treatment recommendation by 12/31/2019. System submitted a CCTR which was approved on 02/5/2021. System has an outstanding violation for failure to submit a Lead Consumer Notice in first half of 2019. The Department is working on a broader initiative of reaching out to systems who have failed to submit prior LCNs.
NJ1421355	9 Mars Court	7/30/2019	MCL Violation for Nitrates	10	<ul style="list-style-type: none"> System received two nitrate MCL violations for third and fourth quarter 2020. System received a violation for failure to submit a remedial measures report detailing proposed and completed remedial measures to address the nitrate MCL violation. System submitted a remedial measures report, which was approved on 02/01/2021. System will be installing anion exchange nitrate removal system at point of entry after permit approval from CEHA. System is required to comply with nitrate MCL by August 18, 2021, based on two consecutive quarters below the MCL.

PWSID NO.	SYSTEM NAME	OPERATION START DATE	VIOLATION TYPE	ETT SCORE	STATUS OF ASSISTANCE
Nontransient Noncommunity Water Systems					
NJ1514357	Knesses Bais Levi	06/12/2019	MR for Lead and Copper Rule (LCN) <i>MR for Lead and Copper Rule</i> MR for Inorganic Chemicals MR for Arsenic <i>MR for Nitrates</i> MR for Nitrates	9	<ul style="list-style-type: none"> System has outstanding violations for failure to submit Lead Consumer Notices in first and second half of 2020. The Department is working on a broader initiative of reaching out to systems who have failed to submit prior LCNs. System has outstanding M&R violations for Inorganics and Arsenic for the three year 2017-2019 compliance period and for nitrite. System has yet to complete their sampling. The Department is coordinating with the CEHA to follow-up with requirements.
NJ1407338	Hutcheson House at Bamboo Park	07/16/2018	TT for Lead and Copper Rule	6	<ul style="list-style-type: none"> The Department reviewed the system's TMF Evaluation Plan and found it deficient. The Department will follow-up with system to re-request an updated submission. System provided a SOWT, which was approved on 3/4/2021. System has been returned to compliance.
NJ0506433	Cape Christian Academy	04/29/2019	<i>MR for Lead and Copper Rule</i>	3	<ul style="list-style-type: none"> System has connected to a community water system and was deactivated on 5/4/2021.
NJ1905361	Augusta Center for Persons with Disabilities	05/21/2019	<i>MR for Radionuclides</i>	2	<ul style="list-style-type: none"> Results for group rads from third quarter 2019 were submitted late due to inventory error. The system has returned to compliance for all violations.

PWSID NO.	SYSTEM NAME	OPERATION START DATE	VIOLATION TYPE	ETT SCORE	STATUS OF ASSISTANCE
Nontransient Noncommunity Water Systems					
NJ0811419	Pellegrino Buick GMC	02/04/2020	MR for Lead and Copper Rule <i>MR for Synthetic Organic Chemicals</i> <i>MR for Synthetic Organic Chemicals</i> TT for Lead and Copper Rule	2	<ul style="list-style-type: none"> Outstanding PbCu violation from first half of 2020. The Department has not received a certification from the system that a Tier 3 PN was conducted by August 4, 2021 and is following up with the system regarding this. System incurred an additional violation for copper action level exceedance in June 2021. System must conduct source water monitoring for lead and copper, submit a SOWTR, and an optimal CCTR by December 2021. System has been returned to compliance for a Lead Consumer Notice violation for the second half of 2020. System received additional violations for nitrate and nitrite. The nitrate violation has been returned to compliance and the system has until January 2022 to conduct a Tier 3 PN for failure to take a nitrite sample.
NJ2113344	Delaware Water Gap Travel Plaza	06/01/2018	<i>MR for Lead and Copper Rule (LCN)</i> <i>MCL & TT for RTCR</i>	1	<ul style="list-style-type: none"> System conducted Level 1 assessment for RTCR and has been returned to compliance for all violations.
NJ1326379	Quick Chek Store #178	02/13/2019	MR for Lead and Copper Rule	1	<ul style="list-style-type: none"> The Department requested a TMF Evaluation Plan in 2019 and 2020 and is requesting it again in 2021. If the system is unable to provide the evaluation, they will be referred to enforcement. M&R violation was for Cyanide and has since returned to compliance. The system has outstanding LCN violations that have not

APPENDIX II

CAPACITY DEVELOPMENT PROGRAM: STATUS OF ACTIVITIES FOR SYSTEMS ON 2019 STRATEGY LIST

Status as of June 30, 2020

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
1	NJ0119001	Delilah Terrace Mobile Home Park	<ul style="list-style-type: none"> • Radiological issues and MCL exceedances • Technical and financial capacity issues 	<ul style="list-style-type: none"> • System is working to complete installation of a new well and is currently still operating on one well. • System initially drilled a new well, but after testing, received results indicating that the water would need extensive treatment. Due to this, the system considered the next best option to be drilling another well, connected to a deeper aquifer with better water quality. • This new well was drilled on December 11, 2020, and water quality testing has been completed. In March 2021, the Department received confirmation that test results were clean and this well would likely not require treatment. • The new well is not yet in operation. The system is waiting on approval of well usage permit. The old well will be decommissioned no later than 45 days upon receiving the well permit approval. System has not yet returned to compliance, since the old well needs to be decommissioned.
2	NJ0301001	Buttonwood Mobile Home Park	<ul style="list-style-type: none"> • Radiological MCL issues • Aging infrastructure • Poor operation and maintenance (O&M) • No licensed operator • Failure to issue annual consumer confidence reports • Inadequate storage • No meter to measure flow 	<p>Carry over system from the 2016 List.</p> <ul style="list-style-type: none"> • Radiological violations have been returned to compliance. • System has obtained a licensed operator, but overall management and finances are inadequate. • An ACO was executed on May 1, 2017, and is pending termination due to completion of ACO requirements. • A sanitary survey was conducted at the system in September 2020. • System needs to meet storage requirements, has increasing iron and manganese levels, and water demand issues. • System is working on installing check valves and water meters to help with measuring flow. • Department has been working with the system as a result of funding received through the Water Infrastructure Improvements for the Nation (WIIN) grant to implement necessary capital improvements. • WIIN grant project proposal is to construct a centralized treatment plant, install a small storage tank, and preparation of related planning and design documents.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
3	NJ0303001	Bordentown Water Department	<ul style="list-style-type: none"> Consecutive lead ALEs Technical capacity issues 	<ul style="list-style-type: none"> System has returned to compliance regarding lead sampling results for four monitoring periods. All public education requirements have been completed and suspended for the time being. There is an outstanding CCT study, along with compliance review issues. An AO has been issued by USEPA regarding compliance issues. Bordentown has submitted a revised PbCu sampling plan, which is currently under review by the Department.
4	NJ0305001	Burlington City Water Department	<ul style="list-style-type: none"> Consecutive M&R violations DBP issues Operational issues with storage tanks 	<ul style="list-style-type: none"> All requirements of the ACO (DBP related) have been fulfilled. The Department conducted a site visit in 2020 indicating that system is currently in compliance and in December 2020 the ACO was terminated. MR violations have been resolved.
5	NJ0314001	Fieldsboro Water Department	<ul style="list-style-type: none"> Consecutive lead ALEs and other PbCu issues Technical capacity issues 	<ul style="list-style-type: none"> The Department conducted an inspection in March 2021 and the system was found to be in compliance. PbCu & WQP sampling plans were approved by the Department in 2021. Despite returning to compliance with the lead action level for two monitoring periods, the system exceeded the lead action level in 1st half 2021, triggering the need for the system to resume public education requirements. In June 2021, the Department denied the system's CCT recommendation and is requiring them to submit another CCT recommendation and conduct sequential monitoring and pipe scale analysis.

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<i>Community</i>				
6	NJ0339001	New Lisbon Developmental Center	<ul style="list-style-type: none"> Multiple M&R violations for PbCu, DBPs, and RTCR No approved RTCR sampling plan 	<ul style="list-style-type: none"> A site visit was conducted in January 2020, but a subsequent scheduled site visit could not be conducted due to COVID-19 restrictions. The Department requested additional information to clarify whether 1,2,3-TCP and PFNA samples collected were representative of both wells during normal operation. Additional raw and POE sampling for 1,2,3-TCP and PFNA was conducted in 2021 and it was determined that treatment for the removal of 1,2,3-TCP and PFNA was not required. System has returned to compliance regarding RAA for 1,2,3-TCP & PFNA MCL violations. System has also returned to compliance for Pb & Cu ALEs. MR violations have been resolved.
7	NJ0605002	Tips Trailer Park and Sales	<ul style="list-style-type: none"> Multiple MCL violations for radiologicals Well needs to be decommissioned 	<ul style="list-style-type: none"> All violations returned to compliance in April 2021. System obtained a permit to install a replacement well (well 1R replaces well 1) and treatment plant and then subsequently obtained a permit to operate in Sept 2020.
8	NJ0612001	Bayshore Mobile Home Park	<ul style="list-style-type: none"> Nitrate and radiological issues 	<p>Carry over from the 2016 List.</p> <ul style="list-style-type: none"> Treatment installed for nitrates and radiologicals. System added pH adjustment for corrosion control in 2013 and switched to potassium carbonate in 2015. System closed on their Settlement Agreement to resolve violations on 02/25/2019. The Department looks to continue its outreach efforts to assist the system. Department intends to visit the system to review their TMF. Site visits have been significantly delayed due to COVID-19 restrictions.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
9	NJ0613004	Upper Deerfield Township Water Department	<ul style="list-style-type: none"> Nitrate MCL violations Financial capacity issues 	<ul style="list-style-type: none"> The system previously piloted a biological nitrate treatment process but that process was unsuccessful. Since there is no alternative source and since the receiving authority is not accepting discharged waste at this time, the Department approved the use of a nitrate treatment process that fully treats a proportion of the supply and blends with the remaining supply in order to achieve a point of entry level that is below the MCL. The receiving authority has indicated that it will evaluate Upper Deerfield's application to discharge or the required characterization sampling once submitted. In August 2021, system submitted a permit for nitrate removal treatment, it was determined to be administratively complete, and will undergo technical review by the Department. TP001001 continues to meet the nitrate MCL since the 4th Q 2019. Radiological violations have been resolved.
10	NJ0701001	Belleville Water Department	<ul style="list-style-type: none"> Ongoing DBP, RTRC, and SWTR violations for failure to maintain disinfectant residual Historical PbCu ALEs 	<ul style="list-style-type: none"> In March 2021, Belleville submitted a contingency plan to prepare for the possibility that Newark's treatment upgrades may not result in sustained compliance for Belleville. Belleville has returned to compliance with the HAA5 (2nd quarter 2020) and TTHM (1st quarter 2020) MCLs. Belleville received a violation for failure to replace 7% of LSLs by June 30, 2021. As required, Belleville submitted an LSLR Plan and preliminary schedule to replace 7% of LSLs, which was deemed sufficient on December 7, 2020. In May 2021, the DEP approved Belleville's customer solicitation packet for the LSLR Program. The Department designated the use of orthophosphate as Belleville's optimal CCT. USEPA issued an Administrative Order on Consent in June 2020 requiring a CCT study to determine alternatives by March 2021. During the Fall of 2020, Belleville completed three rounds of sequential sampling, as required by USEPA's Administrative Order. Belleville is currently coordinating with NJIT to conduct pipe scale analysis. Belleville triggered the requirement to conduct a Level 2 Assessment in July, September, and November of 2020. A site visit was conducted in November 2020 following these events. All three Level 2 Assessments have since been approved under the condition of implementing a unidirectional flushing plan.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
10	NJ0701001	Belleville Water Department (Cont'd)	<ul style="list-style-type: none"> Ongoing DBP, RTRC, and SWTR violations for failure to maintain disinfectant residual Historical PbCu ALEs 	<ul style="list-style-type: none"> Belleville has developed an Asset Management Plan including replacement of inoperable valves and hydrant and purchase of unidirectional flushing software. Belleville submitted an anticipated timeline in June 2021 and its first quarterly progress reporting July 2021, as required. On June 16, 2021, the DEP granted an extension until July 2023 to submit a unidirectional flushing plan. Quarterly progress updates are required to be submitted to the DEP indicating the work done to be able to implement this program (e.g., create a GIS map of the distribution system, identify/replace inoperable vales, etc.). Belleville received a SWTR violation for failure to monitor chlorine residual leaving the system in third quarter 2020, which has been returned to compliance.
11	NJ0702001	Bloomfield Water Department	<ul style="list-style-type: none"> DBP MCL and RTRC violations 	<p>Carry over from the 2016 List</p> <ul style="list-style-type: none"> The Department reviewed the submitted TMF Evaluation Form and developed a TMF Improvement Plan for the system. A deficiency letter was sent for the system's RTRC Plan and a revised plan was submitted. The resubmission is under review by the Department. Bloomfield received a violation in September 2020 for failure to replace 7% of its LSL inventory. The Department is working with the system to determine a timeline for a proper service line materials evaluation and schedule for LSLs. The Department approved the system's submitted remedial measures report that laid out how they are going to address their HAA5 and TTHM issues.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
12	NJ0714001	Newark Water Department	<ul style="list-style-type: none"> PbCu ALEs and DBP MCL violations Open finished water reservoir 	<p>Carry over from the 2016 List</p> <ul style="list-style-type: none"> Newark has three consecutive monitoring periods under the lead action level (i.e., the first and second half 2020, and first half of 2021 monitoring periods). System is working towards covering their open finished water reservoir. The Passaic Valley Water Commission (PVWC)-Newark Joint Venture Project on the storage feasibility study is ongoing. In April 2021, a final draft of a report was submitted to the Department which summarizes the work performed to develop a joint project between Newark and PVWC. Multiple disinfectant by-product violations throughout the distribution system. System has returned to compliance with the HAA5 MCL (3rd quarter 2020). The Department approved the system's submitted remedial measures report that laid out how they are going to address their DBP and PbCu issues, with a completion date of all items by the end of April 2020. System has installed and begun treatment in July 2019. the Department approved a permit application for the permanent use of potassium permanganate in May 2021. System is using DWSRF funds to implement a multi-phase lead service line (LSL) replacement project. System has replaced over 21,000 LSLs. There are 2,195 lead services remaining which include full LSLs, partial LSLs, and service lines of unknown material which are to be verified by Newark. System entered into Compliance Agreement Order (CAO) and a Supplemental CAO on July 25th, 2018, and March 29th, 2019, respectively, to address issues found with PbCu and DBPs The Natural Resources Defense Council (NRDC), Newark Education Workers Caucus (NEW Caucus), the City of Newark/ the Newark Department of Water and Sewer Utilities, and the DEP entered into a Settlement Agreement in January 2021. The Department approved a permit application for a filter upgrade project at the Pequannock Treatment Plant in April 2021.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
12	NJ0714001	Newark Water Department (Cont'd)	<ul style="list-style-type: none"> PbCu ALEs and DBP MCL violations Open finished water reservoir 	<ul style="list-style-type: none"> In May 2021, the Department received Newark's final report detailing whether the zinc orthophosphate effectively optimizes corrosion control treatment as a requirement of the temporary treatment approval permit. This report and any additional data received will be evaluated by the Department in review the treatment permit and setting OWQPs for Newark. In July 2021, the Department issued an approval letter for the Remedial Measure Report for turbidity and disinfection treatment technique violations from September 2020. In July 2021, the Department received Newark's revised proposal for ending the filter program prior to the designation of optimal WQPs by the Department pursuant to paragraph 27(I) of the SCAO.
13	NJ0716001	Nutley Water Department	<ul style="list-style-type: none"> DBP MCL violations Managerial and financial capacity issues 	<ul style="list-style-type: none"> System has been returned to compliance for their HAA5 MCL exceedance in 1st quarter 2020, failure to provide public notice for this exceedance, and failure to remediate the HAA5 MCL within one year. System has automatic flushers installed and they are also conducting a full system hydraulic study. System received PbCu violations in 2020 for failure to monitor WQPs. In SFY2021, the Department provided direct assistance to the system to address deficiencies in the systems PbCu sampling plan and WQP monitoring plan. Their PbCu sampling plan was approved in March 2021 and their WQP monitoring plan was approved in April 2021.
14	NJ0805003	Malaga Village Apartments	<ul style="list-style-type: none"> Radiological MCL violations 	<ul style="list-style-type: none"> System entered an ACO on October 3, 2017 for Radiological MCL violations dating back to the first quarter of 2015. System has complied with the ACO and remains in compliance.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
15	NJ0810005	Manor Water Association	<ul style="list-style-type: none"> Chronic non-acute total coliform issues 	<ul style="list-style-type: none"> Administrative Order and Notice of Civil Administrative Penalty Assessment (AONOCAPA) was issued in July 2020 to the system for failing to conduct Level 1 Assessments & associated Tier 2 Public Notices, failure to submit 5 Level 2 Assessments & 5 Tier 2 PNs, failure to complete and distribute CCRs, and failure to distribute Lead Consumer Notice. System received additional monitoring and reporting violations for Total Coliform in SFY2021 and continues to be out of compliance for failure to conduct chronic level 2 assessments. System has submitted an RTCR Plan and distributed a Lead Consumer Notice in response to the AONOCAPA. Penalty to address all violations over a 2.5 year period exceeded \$10,000. A hearing request for the system is under consideration.
16	NJ1111001	Trenton Water Works	<ul style="list-style-type: none"> Open finished water reservoir Managerial capacity issues Insufficient ERP PbCu issues 	<ul style="list-style-type: none"> The Department is working with Trenton on a proposed tank project to meet requirements of LT2 and address the Pennington Reservoir, an uncovered finished reservoir. System has three open lead ALE violations. These violations will be returned to compliance once the orthophosphate treatment unit has been installed at the Filtration Plant and OWQP's have been set. Trenton has installed the first phase of CCT treatment, which serves about 80% of the water system. System did not meet LSLR requirements outlined in their July 26, 2018 PbCu ACO. System has replaced 4745 lead service lines in their distribution system out of 31791 potential lead service lines. Trenton Water Works received two additional SWTR violations in SFY2021 for failure to monitor turbidity. Ongoing managerial and financial issues at the system including consistently inadequate and late submittals and lack of allocation of necessary funding.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
17	NJ1710304	Eagleview Health & Rehab	<ul style="list-style-type: none"> Radiological MCL violations 	Carry over from the 2016 List <ul style="list-style-type: none"> System's radiological MCL violation have been closed out. ACO was terminated 09/25/2018 due to the system meeting all requirements System will need to update their O&M manual previously submitted to include certain treatment operation and maintenance procedures. The Department continues to monitor system for additional assistance needs. In 2020, the system received RTCR monitoring and reporting violations for April 2020 and a DBP monitoring violation, which have been returned to compliance.
18	NJ1902003	Lake Lenape Water Company	<ul style="list-style-type: none"> History of water main breaks and water quality complaints TMF capacity issues 	<ul style="list-style-type: none"> Sanitary survey conducted in July 2021 showed ongoing issues with undersized pipes and well security. Additionally, Well 1 shall be designated as emergency use due to low usage. Ongoing water quality complaints in 2021. Follow-up sampling was conducted showing water quality was within regulations. Bureau requires system to sample for all water quality complaints received. Previous violations returned to compliance except for a Lead Consumer Notice violation.
19	NJ1904004	North Shore Water Association	<ul style="list-style-type: none"> History of water main breaks and water quality complaints TMF capacity issues 	Carry over from the 2016 List. <ul style="list-style-type: none"> Department has been working with the system as a result of funding received through the Water Infrastructure Improvements for the Nation (WIIN) grant to implement necessary capital improvements. WIIN grant project proposal is to upgrade pump house/treatment plant by bringing it above grade, upgrade or rehabilitate distribution system components that are associated with the pump house/treatment building, rehabilitate electrical circuitry, and preparation of related planning and design documents. System has ongoing issues with their aging infrastructure including pumps and distribution system piping. In SFY2021 it was identified that the system does not have an emergency generator. A TMF evaluation and site visit were completed with the system.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
<i>Community</i>				
19	NJ1904004	North Shore Water Association (Cont'd)	<ul style="list-style-type: none"> History of water main breaks and water quality complaints TMF capacity issues 	<ul style="list-style-type: none"> The system received assistance from Rural Community Assistance Partnership (RCAP) Solutions to address their O&M manual issues, document operations tasks, and expand managerial capacity.
20	NJ1920001	Stillwater Water District 1	<ul style="list-style-type: none"> History of water quality complaints History of chlorine residual issues High manganese and iron levels in well TMF capacity issues 	<ul style="list-style-type: none"> There are ongoing water quality complaints in 2021, with reports of low pressure and colored water. The Department investigated these complaints and required the system to do multiple sampling events. The results of the sampling deemed the water quality to be within regulatory limits. System has one well turned off due to Radionuclides and is working on a loan to address this. The Department is working with RCAP Solutions to provide the system with technical assistance. The Department and RCAP are helping the system with their managerial capacity and educating the system board on the need to know items with operating and maintaining a drinking water system. RCAP is also working with Stillwater to hire a new L.O., a capital improvement plan, and investigates potential alternative operations management. RCAP has also referred the system to the Community Engineering Corp.
21	NJ1921001	Sussex Water Department	<ul style="list-style-type: none"> Distribution system improvements needed DBP issues 	<p>Carry over from the 2016 Strategy List.</p> <ul style="list-style-type: none"> ACO issued for DBP Rule violations, as well as other system deficiencies USEPA issued two AOs which have been closed out due to continued actions of system. System has changed management companies, as well as licensed operators. Additionally, RCAP is working with Sussex to conduct a rate study of their water system. The Department will continue to monitor system's compliance to ensure capacity is maintained.

#	PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS OF ASSISTANCE
Noncommunity				
22	NJ0333325	Original Tony's Pizza	<ul style="list-style-type: none"> History of M&R and MCL violations Technical and managerial capacity issues 	<ul style="list-style-type: none"> The MCL & M&R violations from prior to 2020 have been resolved. The Department will continue to monitor system's compliance to ensure capacity is maintained.
23	NJ0505342	Snows/Doxsee Inc.	<ul style="list-style-type: none"> History of M&R violations PbCu issues Technical and managerial capacity issues 	<ul style="list-style-type: none"> System had M&R violations for DBPs and RTRC in 2020 which have been resolved. System has an outstanding Lead Consumer Notice violation from 2020. The Department has reached back out to system and is working on a broader initiative of reaching out to systems who have failed to submit prior LCNs.
24	NJ0511305	Upper Township Middle School	<ul style="list-style-type: none"> Numerous M&R and TT violations for PbCu Technical and managerial capacity issues 	<ul style="list-style-type: none"> System was referred to the Cape May CEHA on October 23, 2019. The CEHA is working on enforcement action in conjunction with the Department to bring the system into compliance. Enforcement will be assisting Cape May in drafting enforcement documents. A sanitary survey was conducted in July 2021 and the Department is working on compiling the findings.
25	NJ1351338	NJ Christian Academy Main Building Well 2	<ul style="list-style-type: none"> MCL violations for RTRC Technical and managerial capacity issues 	<ul style="list-style-type: none"> Level 2 assessment was conducted to address acute RTRC MCL violation in 2019. AONOCAPA issued by The Department in July 2020 for failure to perform corrective actions, including construction of approved treatment upgrades. The AONOCAPA was closed in July 2021. System has proposed merging/deactivating some of their PWSIDs. Recent DBP monitoring violations for February through May 2021 are outstanding.