

2019 Annual Capacity Development Program Report

State Fiscal Year 2019
July 1, 2018 to June 30, 2019

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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 2019 (SFY19), which covers the period from July 1, 2018 through June 30, 2019. The activities included in this report were outlined in the Capacity Development Program SFY19 Work Plan (2019 Work Plan), which was submitted to USEPA on June 22nd, 2018.

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 2017 Governor's report addresses the progress made towards improving the TMF capacity of public water systems during 2015, 2016, and 2017, and was finalized and submitted to Governor Christie on September 29, 2017. Information included in this SFY19 report will be included in the next Governor's report due by September 30, 2020.

SFY19 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 community and 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 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 SFY19, which are used by agencies to ensure capacity for new systems. In accordance with the State's Capacity Development Strategy, the Department requires permits for the construction of 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 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 system's capacity. For a system to an approved water system by the Department, a TMF Evaluation is required, including a description of the 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 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 community and new nontransient noncommunity systems approved by the Department during SFY17, SFY18, and SFY19. There has been one (1) new community and fourteen (14) 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 June 2019. 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 given, to return the 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 system's violation history from that 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 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 trainings more available and affordable to operators; and
- Using federal funds to enhance the program and assure that New Jersey meets USEPA guidelines.

During SFY19, the Department offered training sessions and seminars for licensed operators that covered a variety of topics including the maintenance of TMF capacity to comply with federal and State regulations.

One of the contracts the Department utilizes to provide operator training is with New Jersey Water Association (NJWA). The current \$161,000 contract requires NJWA to provide 70 training sessions from April 1, 2018 to December 31, 2019. While the contract is geared towards operators and owners of small drinking water systems, representatives from systems of all sizes are welcome to attend scheduled trainings. During SFY19, these sessions covered topics that included air stripper and filtration maintenance, work zone safety and flagger operations, water system distribution operations, well rehabilitation and maintenance, underground utility locating, and other essential topics for drinking water operators. These sessions provided training to 90 small water systems (i.e. those serving less than 10,000), with a total of 1,053 individuals attending. Trainings are conducted in the northern, central, and southern regions of New Jersey and are approved for Training Contact Hours (TCHs). The Department continues to explore ideas for new training sessions with NJWA for licensed operators with a new contract that is under development with the same terms as the previous contracts. This new contract will have a work period of January 1, 2020 to December 31, 2021.

In addition to the above contract, the Department also has a \$198,000 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, from January 1, 2018 to June 30, 2020, to licensed operators at a discounted rate. During SFY19, 38 training sessions were provided. Some topics covered at these trainings were operation and maintenance of pumps, the Safe Drinking Water Act regulations, ethics, distribution system water

quality, and various other topics for drinking water operators. From the training sessions during SFY19, 453 drinking water operators were in attendance. In total for this contract, 60 training sessions were held with 803 drinking water operators in attendance. The new contract is still under review and the Department anticipates its execution early SFY20.

In SFY19, the Department conducted multiple 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, current issues the systems may be facing, as well as options they can use to address them, and possible elements to be included in the WQAA rule. Along with these activities listed above, the Department completed updates to the Division's WQAA website to include information on upcoming requirements and frequently asked questions (FAQs).

WQAA requires systems with more than 500 service connections to routinely perform certain best management practices and to develop cybersecurity and asset management plans. 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 SFY20.

On June 6, 2019, the Operator Certification program held an external stakeholder meeting for the regulated community, which included both drinking water and wastewater systems and operators, to provide opportunities for participants to ask questions and provide comments to Department staff regarding the future of the Operator Certification Program. The Department will continue to evaluate and make improvements to the program, focusing on key topic areas identified during the self-assessment and stakeholder meetings, including licensing examinations, updated training materials, workforce development, regulatory requirements and compliance.

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)* system is widely used for compiling and maintaining drinking water inventory data, system information, permitting documents, reporting, and enforcement activities.

In SFY19, through the use of the different data systems listed above, along with the development of newly designed and more effective queries, such as the "*Licensed Operators with More Than 10 Public Water Systems and Associated Violations*" and the "*Tracking Compliance Schedule*" queries, the Capacity Development Program was able to improve its efficiency in reviewing water system compliance data needed to evaluate the capacity level of a given system.

Technical Assistance and Technical, Managerial, and Financial Evaluations

In SFY19, the Department provided direct technical assistance to water systems that failed to demonstrate adequate TMF capacity, in conjunction with evaluating the TMF capacity of those water systems that were either referred to the program for assistance, or required to demonstrate capacity, with the intention of resolving the issues they may face. This function is performed on an ongoing basis.

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 an 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 that is done under this contract includes a preliminary asset management assessment, engineer's recommendations, and an evaluation on alternative options. During SFY19, the NJWA assisted only one water system under the existing contract.

The Department plans to execute a new Engineering Services contract in SFY20. While the engineering contract has been a successful tool for providing small 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 in FFY18 and FFY19. Because the New Jersey Water Bank funded a record number of projects and currently has more project applications in-house than in previous years, the Department finalized the FFY18 and FFY19 Intended Use Plans

(IUP) in March 2019 with changes to accommodate funding the maximum number of these projects. Further amendments to the FFY19 IUP were proposed in September 2019 regarding the funding timelines and project caps. Subsequently, the engineering contract and contract milestones may include changes to target high ranking, high priority drinking water projects, and to address recent changes to the Safe Drinking Water Act emphasizing disadvantaged communities.

- Site visits with Department staff, in coordination with Enforcement and the County Environmental Health Act Certified Agencies (CEHAs) are performed routinely to assist water systems in achieving and maintaining compliance with the rules. Site visits are prioritized to focus 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 2016 Strategy List and the assistance performed SFY19.
- The TMF evaluations for those water systems required to demonstrate technical, managerial, and financial capacity for this reporting period were completed through the following channels:
 - Evaluations for water systems on the 2016 Strategy List were conducted. An update on those findings 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 SFY19, \$119,473,433.00 DWSRF funds were invested for 27 drinking water projects. 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;
 - New community and nontransient noncommunity systems, and transient systems reclassified as such, must demonstrate TMF capacity. During SFY19, there were six new nontransient noncommunity systems, and two transient noncommunity water systems that were reclassified to nontransient noncommunity water systems due to a population increase. These systems are required to submit a demonstration of technical, managerial, and financial capacity for review. The Department will be following-up with the CEHA on systems that fail to complete this evaluation to ensure compliance.

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 systems and the status of violations;
- Execution of a Joint Partnership with the New Jersey American Water Works Association to assist struggling systems obtain no-cost engineering assistance through the Community Engineering Corps;
- An ongoing self-assessment of the Department's Capacity Development Program, which began in 2017, continues 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 systems in need of assistance or development of capacity, training offerings, and forms and processes;
- In SFY19, 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 SFY19 status updates for those awardees of the USEPA Compliance Grant Contracts:
 - a. NJWA provides technical assistance to small systems out of compliance with the SDWA, along with the training sessions for operators and system owners provided under contract with the Department;
 - b. EFC provided a managerial and financial capacity training called *Managing Your Water System into the Future*, in NJ on June 3rd, 2019 at Thomas Edison College in Trenton, NJ. EFC is planning to schedule this training again in North Jersey for interested operators and system owners; and
 - c. RCAP provides training and technical assistance for small public water systems to achieve and maintain compliance.
 - i. Training: RCAP, in partnership with AWWA-NJ, conducted a full-day training on October 2nd, 2018 to assist small water systems with drinking water regulations and compliance. RCAP also held a half-day training on October

3rd, 2018 that provided operators with examination preparation on basic math and chemistry concepts. For the remainder of the grant contract cycle, training 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 reached out to thirteen (13) small water systems identified by the Department to provide targeted assistance with technical, managerial, and financial issues free of charge to the water system. They plan to continue their outreach efforts to an additional fifteen (15) systems in SFY20. The SFY19 projects focused on updates to existing procedures, including Operations and Maintenance (O&M) manuals and sampling plans, intended to improve compliance at these water systems.

The Department is assisting by providing recommendations for training topics, training locations, and the names of the 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 systems in need of capacity development assistance?

The principal way that the Department identifies systems in need of capacity development assistance is through the preparations of a Strategy List. The preparation of the Strategy List identifies and prioritizes those public water systems most in need of capacity development. The Strategy List also 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 20 community and noncommunity water systems on the 2016 Strategy List can be found in Appendix II.

The 2019 Strategy List, found in Appendix III, include those systems identified in need of technical, managerial, and/or financial capacity. The Department uses several factors to determine which systems are in need, including a review 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). 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 a few other factors. Using the methods mentioned, seven (7) systems were carried over from the 2016 Strategy List and seventeen (17) 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.

The Capacity Development Program continues to prioritize water systems with water quality or TMF capacity issues referred from Department staff or CEHAs after the Strategy List is established. Priority points are assigned based on risk factors such as population, violations, administrative consent orders (ACO) and administrative orders (AO), system classification, a few other factors. Site visits are conducted for high priority systems and the Department also considers these systems for the next Strategy List.

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 has reached out and provided assistance to those systems on the 2016 Strategy List as well as additional systems that were in need of assistance. The capacity evaluations performed for these community and noncommunity water systems identified 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 systems can be found in [Appendix II](#).

In SFY19, the Capacity Development Program continued to perform background research; conduct TMF capacity evaluations and site visits; develop improvement plans; and help systems implement those improvement plans. Staff have facilitated meetings with 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 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.

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.

Lastly, the Department continues to review activities and approaches that other state capacity development programs implement to identify and consider successful strategies such as the following:

- Utilizing violation and compliance data to center training efforts where needed (Colorado);

- Developing a water system board and council education program to educate water system representatives on the decisions and responsibilities (Colorado);
- Developing an online small drinking water systems course for prospective operators and owners of small drinking water systems (Delaware); and
- Creating a network of trained volunteers that promote the proper operation and maintenance of drinking water systems, with a focus on small water systems (Pennsylvania).

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 conducted a review of its existing system strategy as part of a 2016 self-assessment 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. As a result, the Department implemented a new strategy which utilizes a team approach described below to provide assistance to water systems on the Strategy List.

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

As noted above, the Capacity Development Program strategy has been revised to focus on a team approach to aid those systems on the Strategy List (listed in Appendix II). With this approach, the Department's intent is to have individuals work closely with the assigned systems to provide them with the resources needed to achieve compliance, since many systems remain on the list without noticeable improvement. The utilization of a team approach will help dedicate more attention to these at-risk systems. This new 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 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 systems in the future.

Furthermore, the SDWA Amendments in AWIA of 2018 (AWIA Section 2012) instruct state capacity development programs to update their existing system strategy to reflect initiatives and efforts that encourage public water systems asset management planning, as well as assisting public water systems with relevant training with implementing asset management plans.

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

- The Department's Engineering Services Contract
 - For participation under this contract, which serves the purpose of assisting small drinking water systems compile engineering designs and specifications necessary for a DWSRF loan, a required milestone is the completion of an asset management plan. Systems are provided a subcontractor to help with this assessment and development of a plan.
- Water Quality Accountability Act P.L. 2017, c. 133 (WQAA)
 - As stated previously, this law requires systems with more than 500 service connections to routinely perform certain best management practices and to develop cybersecurity and asset management plans. 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, they are required to be available upon request during inspection by the Department.
- 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".

The Department and the Capacity Development Program will continue efforts to create assistance partnerships and provide guidance for the regulated community. The Program continues to make modifications to its strategy to benefit New Jersey's drinking water systems and their licensed operators, keeping with the Department's mission statement, and furnishing it with beneficial and proactive efforts.

APPENDIX I

**CAPACITY DEVELOPMENT PROGRAM:
NEW COMMUNITY AND NONTRANSIENT NONCOMMUNITY PUBLIC WATER SYSTEMS
DURING STATE FISCAL YEARS 2017, 2018, AND 2019
WITH
USEPA'S OFFICE OF ENFORCEMENT AND COMPLIANCE'S ENFORCEMENT TARGETING TOOL (ETT) SCORES
(07/01/2016 to 06/30/2019)**

Violations in *italics* have been returned to compliance.

| PWSID NO. | SYSTEM NAME | OPERATION START DATE | VIOLATION TYPE | ETT SCORE | STATUS OF ASSISTANCE |
|--|--|----------------------|--|-------------|--|
| Community Water Systems | | | | | |
| 1924006 | Town Center at Wantage | 01/26/2017 | Monitoring/ Reporting (MR) for Radionuclides; <i>MR for Lead and Copper;</i> <i>MR for Volatile Organic Chemicals (VOCs);</i> Monitoring/ MR for Revised Total Coliform Rule; <i>Maximum Contaminant Level (MCL) Exceedance for Revised Total Coliform Rule (RTCR)</i> | 5 | <ul style="list-style-type: none"> Sanitary Survey conducted on 10/30/17; System submitted a technical, managerial, and financial (TMF); System implemented corrective actions and the Department required monthly source water monitoring to confirm there is no issue with the well; The system received an <i>E. Coli</i> MCL violation on 2/23/2018 requiring a Level 2 Assessment. The assessment identified a broken outside sample tap and service line repair as a cause of the issue. System made these repairs and chlorinated. The Department issued the system a temporary treatment approval on 3/2/2018 for a 4-log UV for disinfection that expired on 12/31/2018. Site inspection showed that the 4-log UV for disinfection is inactive at the system. System returned to compliance on 3/19/2018. Co-Inspection is to be scheduled SFY20 with Enforcement and the Water Systems Technical Assistance group. |
| Nontransient Noncommunity Water Systems | | | | | |
| 0506433 | Cape Christian Academy | 04/29/2019 | None | Not on List | <ul style="list-style-type: none"> System has no violations |
| 0108420 | Storybook Land - Bathroom | 04/22/2019 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |
| 1326379 | Quick Chek Store #178 | 02/13/2019 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |
| 0436499 | New Jersey Motor Vehicle Inspection Stat | 01/01/2019 | <i>MR for Nitrates</i> | 0 | <ul style="list-style-type: none"> Compliance was achieved for these violations The Department will be reaching out to the system to complete a TMF Evaluation Plan |
| 2104337 | Imperial Machine and Tool | 11/08/2018 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |
| 1514355 | Shiras Chaim | 11/07/2018 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |

| PWSID NO. | SYSTEM NAME | OPERATION START DATE | VIOLATION TYPE | ETT SCORE | STATUS OF ASSISTANCE |
|--|--|----------------------|--|-------------|---|
| Nontransient Noncommunity Water Systems | | | | | |
| 1427420 | First Priority | 09/25/2018 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |
| 0805448 | McDonalds #27150 | 07/27/2018 | <i>MR for Ground Water Rule and Total Coliform Rule (TCR) and Sample Siting Plan Errors for RTCR</i> | 0 | <ul style="list-style-type: none"> System installed raw water sampling tap and corrected RTCR sample siting plan errors The Department will be following up with the system to ensure compliance and will be reaching out to the system to complete a TMF Evaluation Plan |
| 1407338 | Hutcheson House at Bamboo Park | 07/16/2018 | None | Not on List | <ul style="list-style-type: none"> System has no violations The Department reached out to the system to complete a TMF Evaluation Plan and is still awaiting submission; will follow up |
| 2113344 | Delaware Water Gap Travel Plaza | 06/01/2018 | <i>Treatment Technique (TT) Violation for RTCR</i> | 5 | <ul style="list-style-type: none"> The system failed to conduct a Level 1 Assessment to identify any issues and corrective actions by deadline System incurred an E. coli positive collected on 07/12/2019 Level 2 Assessment was completed on 07/17/2019; however, it was rejected since it was submitted on the incorrect form The Department reached out to system to complete a TMF Evaluation plan and is awaiting submission The Department will follow up on the required items |
| 0504900 | The Learning Garden/South Seaville Umc | 01/19/2018 | None | 5 | <ul style="list-style-type: none"> 2018 Nitrate M&R violation was incorrectly issued due to an inventory discrepancy in SDWIS; system was not required to monitor; violation was subsequently rejected. Department will be reaching out to the system to complete a TMF Evaluation Plan |
| 1319497 | Oak Glenn Plaza 2 | 04/20/2017 | None | Not on List | <ul style="list-style-type: none"> System has no violations |
| 0614350 | ARC of Cumberland County - Evanoff | 02/21/2017 | MR for Lead and Copper; <i>MR for Nitrates;</i> <i>MR for VOCs;</i> | 2 | <ul style="list-style-type: none"> Systems CCTR was approved on 4/2/2018; System submitted Lead and Copper and Water Quality Parameter Sampling Plans on 3/29/19. The plans are still under review; Based on the most recent lead and copper sampling results, the system is in compliance with the ALE |
| 2122333 | John Johnson Chrysler Dodge Jeep & Ram | 09/29/2016 | <i>TT Violation for RTCR</i> | 0 | <ul style="list-style-type: none"> Sanitary Survey conducted by CEHA on 05/08/2018- no significant deficiencies found; System was returned to compliance for nitrate after conducting monitoring in 4th Quarter of 2018 and for RTCR after submitting their Level 1 Assessment on 10/16/2017 and proposing corrective actions on 11/18/2017 |

APPENDIX II

CAPACITY DEVELOPMENT PROGRAM: STATUS OF ACTIVITIES FOR SYSTEMS ON 2016 STRATEGY LIST

Status as of June 30, 2018

Those systems needing “***No Further Action***” have completed the identified steps to obtain TMF capacity and have been removed from the Strategy List.

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|------------------|-----------|-----------------------------|---|--|
| Community | | | | |
| 1 | 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; | Carry over system from the 2013 List. <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 Administrative Consent Order (ACO) was executed on May 1, 2017 and is still active; • Sanitary Survey conducted at system on 06/14/2019 • System needs to meet storage requirements • Systems is working on installing treatment for one of their wells with rising iron levels • System is working on installing check valves and water meters to help with measuring flow |
| 2 | NJ0612001 | Bayshore Mobile Home Park | <ul style="list-style-type: none"> • Nitrate MCL violations • High sodium in wells; • Septic problems due to cesspools; • Radiological violations | Carry over from the 2013 List. <ul style="list-style-type: none"> • Treatment installed for nitrates and radiologicals; • pH adjustment added for corrosion control in 2013; • System closed on their Settlement Agreement to resolve violations on 02/25/2019; • the Department looks to continue their outreach efforts to assist the system; • Department intends to visit the system to review their TMF; • Department will monitor system's accrued violations quarterly to view improvement. |
| 3 | NJ0702001 | Bloomfield Water Department | <ul style="list-style-type: none"> • MCL/disinfection byproducts • TCR violations | Added to 2016 Strategy List. <ul style="list-style-type: none"> • A complete TMF Evaluation Plan and Improvement Plan was submitted and reviewed by the Department; • System's submitted RTR Plan is still under review and the Department sent comments to the system that need to be addressed; • The Department approved the system's submitted remedial measures report that laid out how they are going to address their HAA5 and TTHM issues, with a completion date of all items by the end of July 2019 <p>The Department will continue to follow up with the system to ensure compliance</p> |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|---|-----------|--------------------------|---|--|
| 4 | NJ0714001 | Newark Water Department | <ul style="list-style-type: none"> Lead and Copper Rule ALE DBP MCL violations Open finished water reservoir | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> Accrued ALE violations for Lead and Copper Rule; Corrosion control treatment recommendation sent to the Department was approved April 2019; System is working towards covering their open finished water reservoir; Multiple disinfectant by-product violations throughout the distribution system; The Department approved the system's submitted remedial measures report that laid out how they are going to address their DBP and Lead and Copper issues, with a completion date of all items by the end of April 2020 System is using DWSRF funds to implement a multi-phase lead service line replacement project 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 Lead and Copper and DBPs. |
| 5 | NJ1013001 | Hampton Borough | <ul style="list-style-type: none"> System lacks firm capacity System only has one operational well; No approved contract for interconnection with Glen Gardner | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> DWSRF funds have been awarded for the construction of backup well #5; A Safe Drinking Water Permit to Construct was issued on July 2016 for the new well construction; Estimated construction completion date of May/June 2019; Department will follow up System found their interconnection agreement established with Glen Gardner dated 1993 System is continuing to track sources of unaccounted for water The Department is moving this system to "No Further Action" Department will continue to monitor system's compliance to ensure capacity is maintained. |
| 6 | NJ1710304 | Eagleview Health & Rehab | <ul style="list-style-type: none"> Radiological MCL violations | <p>Added to 2016 Strategy List.</p> <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 |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|---|-----------|--|--|--|
| 7 | NJ1615001 | West Milford MUA- Birch Hill Park | <ul style="list-style-type: none"> Ground Water Rule (GWR) Significant Deficiencies Significant sanitary survey deficiencies | Carry over from the 2013 List. <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans and O&M manual, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |
| 8 | NJ1615002 | West Milford MUA- Greenbrook Estate | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | Carry over from the 2013 List. <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans and O&M manual, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |
| 9 | NJ1615006 | West Milford MUA- Parkway | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | Carry over from the 2013 List. <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans, O&M manual, a consolidated emergency response plan, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|----|-----------|--------------------------------|--|---|
| 10 | NJ1615012 | West Milford MUA-Awosting | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans, O&M manual, a consolidated emergency response plan, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>“No Further Action”</i> Department will continue to monitor system’s compliance to ensure capacity is maintained. |
| 11 | NJ1615014 | West Milford MUA-Crescent Park | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans, O&M manual, a consolidated emergency response plan, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>“No Further Action”</i> Department will continue to monitor system’s compliance to ensure capacity is maintained. |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|----|-----------|--|--|---|
| 12 | NJ1615016 | West Milford MUA- Olde Milford Estate | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans, O&M manual, a consolidated emergency response plan, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |
| 13 | NJ1615018 | West Milford MUA- Bald Eagle Village | <ul style="list-style-type: none"> GWR Significant Deficiencies Significant sanitary survey deficiencies | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> System was purchased by a private owner December 2018; Per change in ownership, system will be required to complete a technical, managerial, and financial evaluation to assess their capacity ACO issued to this system requires the system to update their sampling plans, O&M manual, a consolidated emergency response plan, submit remedial actions and schedule for implementation, along with additional system improvements by December 31, 2021 The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|----|-----------|-------------------------------|--|---|
| 14 | NJ1904004 | North Shore Water Association | <ul style="list-style-type: none"> • Facility lacks auxiliary power • Distribution system is antiquated • System only has one well • Financial problems • Leaking oil tank contaminated system's well and treatment was installed by Spill Fund | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> • System will need a storage waiver; • Department looks to work with the system to decommission old well, if needed; • A TMF evaluation and site visit were completed with the system • The Department is working with Resources for Communities and People (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 • System is working on updating their financial records in order to apply for DWSRF funds to help with system improvements |
| 15 | NJ1921001 | Sussex Water Department | <ul style="list-style-type: none"> • Distribution system improvements needed • Disinfectant by-product issues | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> • ACO issued for Disinfection Byproduct (DBP) Rule violations, as well as other system deficiencies; • EPA performed a sanitary survey with Enforcement and the Department 5/21-23/2018; • Debriefing with the Department was held December 2018/January 2019 to finalize the findings and action items system needs to complete • System is working with EPA and the Department to complete action items that need to be completed following the inspection • EPA issued two Administrative Orders (AOs) that will incorporate concerns about the system's chemical storage, employee safety with regards to Chlorine dioxide gas, on-site data storage, monitoring and reporting, licensed operator coverage, standard operating procedure (SOP)/O&M manual and recordkeeping. • System has changed management companies, as well as licensed operators • Installation of treatment to address DBP violations was completed 11/09/2018 • The Department will continue to monitor system's compliance to ensure capacity is maintained |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|----|-----------|-------------------------------------|--|---|
| 16 | NJ1922010 | Suez Water New Jersey Lake Glenwood | <ul style="list-style-type: none"> GWR significant deficiencies Firm capacity issues Undersized mains Lead Consumer Notice Violation | <p>Carry over from the 2013 List.</p> <ul style="list-style-type: none"> System received assistance through the Engineering Services Contract to assist with applying for a DWSRF loan and meeting system deficiencies; An asset management assessment was performed for the system; Construction of well #1 and #2 and treatment upgrades to correct GWR significant deficiency have been completed; Planning docs and design plans & specs completed and submitted all required permits; Lead Consumer Notice violation was returned to compliance on 03/05/2019; The Department is moving this system to <i>"No Further Action"</i> Department will continue to monitor system's compliance to ensure capacity is maintained. |
| 17 | NJ2103002 | Belvidere Square Apartment Complex | <ul style="list-style-type: none"> Chronic coliform excursions well rehabilitation needed | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> System is currently purchasing city water and has not incurred any violations. System was originally seeking funding through the DWSRF program to install a well, treatment, and piping. The system received engineering assistance through the Engineering Services Contract. System has decided to continue to purchase city water due to higher than anticipated project cost estimates. The Department will continue to monitor the progress of this system's project and upon completion will ensure the system is inactivated, as appropriate. The Department is moving this system to <i>"No Further Action"</i> |

| # | PWSID# | PWS NAME | INITIAL REASON LISTED | CURRENT STATUS OF ASSISTANCE |
|---------------------|-----------|---|---|---|
| Noncommunity | | | | |
| 18 | NJ0339320 | Wagner Boot Camp | <ul style="list-style-type: none"> • Total Coliform Rule Violations • Stage 2 Disinfectants and Disinfectant Byproducts Rule violations | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> • System completed their construction of installing PVC pipe, sodium hypochlorite feed system and a hydropneumatic tank to allow for appropriate disinfection contact time, along with installing pH adjustment with caustic soda September 2018 • There have been no recent violations/issues with system • The Department is moving this system to <i>“No Further Action”</i> • The Department will continue to monitor project to completion. |
| 19 | NJ0603324 | Deerfield Municipal Court & Senior Center | <ul style="list-style-type: none"> • MCL/Radionuclides • MCL/ Nitrate | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> • System has consistently been in compliance and an updated O&M was sent to the Department; • The Department is moving this system to <i>“No Further Action”</i> • Department will continue to monitor system compliance. |
| 20 | NJ1808374 | Bunker Hill Lutheran Church | <ul style="list-style-type: none"> • MCL/Total Coliform Rule • MR/ Total Coliform | <p>Added to 2016 Strategy List.</p> <ul style="list-style-type: none"> • System installed UV disinfection system for 4-log virus inactivation and is in compliance; • The Department is moving this system to <i>“No Further Action”</i> • Department will continue to monitor system compliance. |

Appendix III

Capacity Development Program: 2019 STRATEGY LIST

CREATED AUGUST 2019

*Systems added to the 2019 Capacity Development Strategy List

**Systems carried over from the 2016 Capacity Development Strategy List

| PWSID | PWS Name | PWS Type | Pop Served | Pop Pts | MCL Violations Pts | Inspection Def Pts | M/R Violations Pts | ACO/AO Pts | Total Pts | Reasoning |
|--------------------------------|---------------------------------|----------|------------|---------|--------------------|--------------------|--------------------|------------|-----------|--|
| Community Water Systems | | | | | | | | | | |
| 0119001 | DELILAH TERRACE MHP* | CWS | 210 | 3 | 2 | 3 | 4 | 0 | 12 | <ul style="list-style-type: none"> Radiological issues and MCL exceedances Technical and financial capacity issues |
| 0301001 | BUTTONWOOD MHP** | CWS | 77 | 3 | 3 | 3 | 4 | 7 | 20 | <ul style="list-style-type: none"> Inadequate storage; Managerial and financial capacity issues Iron level issues |
| 0303001 | BORDENTOWN WATER* DEPT | CWS | 15821 | 1 | 3 | 0 | 4 | 7 | 15 | <ul style="list-style-type: none"> Consecutive lead ALEs Technical capacity issues |
| 0305001 | BURLINGTON CITY WATER DEPT* | CWS | 9835 | 1 | 4 | 0 | 0 | 7 | 12 | <ul style="list-style-type: none"> Consecutive M/R violations DBP issues Operational issues with storage tanks |
| 0314001 | FIELDSBORO WATER DEPT* | CWS | 650 | 2 | 2 | 3 | 0 | 0 | 7 | <ul style="list-style-type: none"> Consecutive lead ALEs and other PbCu issues Technical capacity issues |
| 0339001 | NEW LISBON DEV CTR* | CWS | 2014 | 2 | 2 | 3 | 6 | 0 | 13 | <ul style="list-style-type: none"> Multiple M/R violations for PbCu, DBPs, and RTRC No approved RTRC Sampling Plan |
| 0605002 | TIPS TRAILER PARK & SALE* | CWS | 450 | 3 | 2 | 0 | 3 | 0 | 8 | <ul style="list-style-type: none"> Multiple MCL violations for Radiologicals Well needs to be decommissioned |
| 0612001 | BAYSHORE MHP** | CWS | 81 | 3 | 0 | 3 | 5 | 0 | 11 | <ul style="list-style-type: none"> Nitrate and radiological issues |
| 0613004 | UPPER DEERFIELD TWP WATER DEPT* | CWS | 2964 | 2 | 4 | 3 | 4 | 0 | 13 | <ul style="list-style-type: none"> Nitrate MCL violations Financial capacity issues |
| 0701001 | BELLEVILLE WATER DEPT* | CWS | 35129 | 1 | 3 | 3 | 5 | 0 | 12 | <ul style="list-style-type: none"> Ongoing DBP, RTRC, and SWTR violations for failure to maintain disinfectant residual Historical PbCu ALEs |
| 0702001 | BLOOMFIELD WATER DEPT** | CWS | 47315 | 1 | 8 | 3 | 5 | 0 | 17 | <ul style="list-style-type: none"> DBP MCL and RTRC violations |

| PWSID | PWS Name | PWS Type | Pop Served | Pop Pts | MCL Violations Pts | Inspection Def Pts | M/R Violations Pts | ACO/AO Pts | Total Pts | Reasoning |
|--------------------------------|------------------------------|----------|------------|---------|--------------------|--------------------|--------------------|------------|-----------|---|
| Community Water Systems | | | | | | | | | | |
| 0714001 | NEWARK WATER DEPT** | CWS | 273000 | 1 | 6 | 3 | 0 | 7 | 17 | <ul style="list-style-type: none"> PbCu ALEs and DBP MCL violations Open finished water reservoir |
| 0716001 | NUTLEY WATER DEPT* | CWS | 29500 | 1 | 3 | 0 | 5 | 0 | 9 | <ul style="list-style-type: none"> DBP MCL violations Managerial and financial capacity issues |
| 0805003 | MALAGA VILLAGE APTS* | CWS | 100 | 3 | 4 | 0 | 5 | 7 | 19 | <ul style="list-style-type: none"> Radiological MCL violations |
| 0810005 | MANOR WATER ASSOC.* | CWS | 75 | 3 | 0 | 3 | 8 | 0 | 14 | <ul style="list-style-type: none"> Chronic Non-Acute Total Coliform issues |
| 1111001 | TRENTON WATER WORKS* | CWS | 225000 | 1 | 6 | 3 | 6 | 7 | 23 | <ul style="list-style-type: none"> Open finished water reservoir Managerial capacity issues Insufficient ERP PbCu issues |
| 1710304 | EAGLESVIEW HEALTH & REHAB** | CWS | 259 | 3 | 6 | 3 | 0 | 7 | 19 | <ul style="list-style-type: none"> Radiological MCL violations |
| 1902003 | LAKE LENAPE WATER CO.* | CWS | 2900 | 2 | 0 | 3 | 4 | 0 | 9 | <ul style="list-style-type: none"> History of water main breaks and water quality complaints Technical, managerial, and financial capacity issues |
| 1904004 | NORTH SHORE WATER ASSOC.** | CWS | 105 | 3 | 0 | 3 | 0 | 7 | 13 | <ul style="list-style-type: none"> Storage requirement issues Lacks auxiliary power Antiquated distribution system Only has one well Technical and financial capacity issues |
| 1920001 | STILLWATER WATER DISTRICT 1* | CWS | 1200 | 2 | 0 | 3 | 5 | 7 | 17 | <ul style="list-style-type: none"> History of water quality complaints History of chlorine residual issues High manganese and irons levels in well Technical and managerial capacity issues |
| 1921001 | SUSSEX WATER DEPT** | CWS | 2201 | 2 | 3 | 3 | 5 | 7 | 20 | <ul style="list-style-type: none"> Distribution system improvements needed DBP issues |

| PWSID | PWS Name | PWS Type | System Type Pts | System Classification Pts | MCL Violations Pts | M/R Violations Pts | ACO/AO Pts | Total Pts | Reasoning |
|-----------------------------------|---------------------------------------|----------|-----------------|---------------------------|--------------------|--------------------|------------|-----------|--|
| Noncommunity Water Systems | | | | | | | | | |
| 0333325 | ORIGINAL TONY'S PIZZA* | TNC | 1 | 2 | 3 | 6 | 0 | 12 | <ul style="list-style-type: none"> History of M/R and MCL violations Technical and managerial capacity issues |
| 0505342 | SNOWS/DOXSEE INC.* | NTNC | 2 | 1 | 2 | 4 | 0 | 9 | <ul style="list-style-type: none"> History of M/R violations PbCu issues Technical and managerial capacity issues |
| 0511305 | UPPER TWP MIDDLE SCHOOL* | NTNC | 2 | 3 | 0 | 5 | 0 | 10 | <ul style="list-style-type: none"> Numerous M/R and TT violations for PbCu Technical and managerial capacity issues |
| 1351338 | NJ CHRISTIAN ACADEMY MAIN BLDG WELL2* | NTNC | 2 | 3 | 3 | 0 | 0 | 8 | <ul style="list-style-type: none"> MCL violations for RTCR Technical and managerial capacity issues |

KEY: PWS – Public water system; NTNC – Nontransient noncommunity water system; T – Transient noncommunity water system

PRIORITY CODES

High Priority = RED ≥ 12
 Medium Priority = GREEN = 7 to 11
 Low Priority = BLUE ≤ 6