

**Significant Deficiencies
for
Community (CWS) & Non-Transient, Non-Community (NTNC) PWS**

Source

1. Well near source of fecal contamination (ex. septic systems, sewer lines)
 - Septic systems, sewer lines, or other contaminant sources close to well/spring
 - Well head not sealed
 - Column/casing vent not screened
 - Hose bib faucet prior to check valve
 - Abandoned holes not properly sealed
2. Well in flood zone (100 year)
3. Improperly constructed well (ex. not properly grouted)
 - Well not grouted according to MSDH requirements
 - Well casing is compromised
 - Well screen is compromised
4. Spring boxes that are poorly constructed and/or are subject to flooding

Treatment

1. Inadequate application of treatment chemicals and techniques
(Both Primary MCLs and treatment necessary to satisfy state regulations)
 - Disinfection
 - Corrosion control
 - THM/precursor removal
 - Inorganic removal
 - Other MCL related
 - Inadequate application of treatment chemicals
2. Lack of redundant mechanical components where treatment is required -
 - If a system has only one source, then they must have two separate treatment trains such as two separate booster pumps/chlorinators or two solution pumps.
3. Unprotected cross-connections within treatment system
4. Inadequate monitoring
(Both Primary MCLs and monitoring associated with State Regulations)
 - Inadequate disinfection or CT
 - Inadequate monitoring of disinfection residual
 - Inadequate operation/maintenance of treatment monitoring equipment
 - Inadequate treatment monitoring equipment
 - Inadequate records of treatment parameter sampling

Distribution Systems

1. Negative pressure that could result in contamination -
 - Pressure gauge or logger data indicating sustained low pressures on the distribution main
 - Hydraulic model output showing negative pressure areas in the system.
2. Inadequate disinfectant residual monitoring
 - System not flushed periodically
3. Unprotected cross-connections
 - System not surveyed for cross connections
 - Devices not tested as required by Law
 - Failing devices not repaired/replaced and retested

Finished Water Storage

1. Inadequate internal cleaning/maintenance of storage tanks
 - tank not inspected periodically
 - recommended actions of inspection not completed in a reasonable time
2. Improper screening of overflow pipes, drains, or vents
3. Necessary repairs of storage tank roofs or covers not made

Pumps/Pump Facilities and Controls

1. Inadequate pump capacity
2. Inadequate maintenance
3. Inadequate/inoperable control system

Monitoring/Reporting/Data Verification

1. Not monitoring according to site sampling plan or monitoring plan
2. Not meeting reporting requirements
3. Improper recordkeeping

Water System Management/Operation

1. Failure to meet water supply demands (overloaded by serving greater than 100% capacity)
2. No approved emergency response plan or vulnerability analysis (updated annually)

3. Inadequate follow-up on previous deficiencies
4. Inadequate security measures
 - No updated vulnerability analysis
 - No updated emergency plan
 - Inadequate fencing of wells, tanks, pump stations, etc.
 - All vulnerable facilities not secured/locked

Operator Compliance with State Requirements

1. Operator is not qualified as required by the State
2. Lack of required operator training