



## Reworking the Drinking Water System Rating Process

As a critical stakeholder, we wanted to make you aware of the changes we are considering to the water system rating process and to solicit your insight and concerns **PRIOR TO OFFICIAL PUBLIC COMMENT** so that the resulting rule change we put on the table for public consideration is the best possible proposal.

### Background:

- At the time the Improvement Priority System (R309-400) – or IPS Rule – was originally adopted, it was an innovative approach to evaluating water systems. In fact, the EPA based its ETT water rating system on the Utah model.
- Decades later, it's time to take a hard look at the IPS Rule in its entirety. The overall ideal continues to work very well for Utah; the challenge is that issue-focused amendments have resulted in a long and complicated rule.

### Objective:

- Simply, we want to make the existing process better. The Division of Drinking Water is seeking to:
  - Align point values and ensure that risk to public health is the driver
  - Address the possibility that credits mask deficiencies
  - Prompt action by systems who were previously okay with carrying points
  - Check alignment with the Federal rating process so that Utah water systems don't end up on EPA's radar before DDW has had a chance to work with them.
  - Streamline and simplify. The Point Values for various deficiencies and violations are being grouped, clearly explained, and placed in a reference table format.

### Proposed Point Framework:

- The proposed point framework is:
  - Low Health Risk - 5 pts
  - Minor potential to cause harm - 15 points
  - Moderate potential to cause harm; harm becomes worse if not addressed - 25 points
  - Significant potential to cause harm - 50 points
  - Monitoring Violations – 100 points
  - Imminent health threat (automatic not approved status) - 200 Points

### Our Request and Timeline

- The stakeholder process is critical to us. We want to hear your thoughts and concerns over the next few months and adjust the concept, where needed. Then, by February, we intend to be able to show you specifically what a change in the IPS Rule could mean to your water system and to address any remaining concerns that you see that we didn't.
- We hope to take the resulting draft rule to the Drinking Water Board in April, 2019 and then to send it out to public comment.
- The overall goal is to be able to implement the new IPS Rule by the January, 2020 sanitary survey season.

### Questions? Contact????