

**2020 Level 2 Assessment Response Form**  
**RI1592023 - Prudence Island Water District**

**Required System Operator Classification: D-1**

**Sanitary Defects**

The Sanitary Defects below were identified as part of the October 8, 2020L2A for RI1592023 - Prudence Island Water District. To protect your public water supply, the following sanitary defects must be corrected by the Due Date below. You are required to Notify RIDOH when each sanitary defect has been corrected. The written response requires, when applicable, photographic evidence of the repairs to the PWS and/or a contractor's invoice. **Authority: 216-RICR-50-05-1 Rules and Regulations Pertaining to Public Drinking Water.** The Administrative Contact (AC) or Designated Operator (DO), if applicable, must notify RIDOH once the repairs are made. The item number must be noted on any written response and/or photographic evidence. Failure to provide a status or complete the corrective actions by the due date will result in referral to the enforcement program where a treatment technique violation will be issued against the Licensee (PWS).

This office must be notified of any modifications to your system as per 216-RICC-50-05-1, Sec.1.5. An **Application for Approval** form must be submitted for any planned significant modifications including equipment upgrades and design improvements to your source, treatment, storage and pumping facilities. Routine maintenance on a water system, such as pipe and valve replacement or repair does not need to be reported but should provide equivalent capacity and be NSF 61 certified.

An **In-Kind Replacement** form must be submitted for replacement of pumps, pressure tanks or treatment components that are functionally equivalent to the original components. The forms must be submitted prior to the work being undertaken unless it is an emergency. When an emergency requires replacement of equipment it must be NSF 61 certified or RIDOH will require that it be replaced with appropriately certified components.

Please remember to check your current sampling schedule regularly on our Drinking Water Watch website ([www.health.ri.gov/waterinfo](http://www.health.ri.gov/waterinfo)) to stay up to date on your sampling requirements. You can search by your system name or by your public water system license number, which can be found on page 1 of this packet. Drinking Water Watch also has the list of facility codes and other information about your water system that is required for the Level 2 Assessment.

Attach an additional sheet if more room is required

**Compliance Schedule and Corrective Action Table**

<b>ITEM NO.</b>	<b>Sanitary Defect and Corrective Action</b>	<b>Due Date</b>
L2A(10/NWSI/2017) Item No. 1	During the Level 2 Assessment the assessor noticed there was no backflow prevention device present besides a check valve in the Indian Spring Well 1 (WL008). Check valves within wells can fail, meaning that if the system loses pressure water within the distribution system can be back siphoned into the well, potentially contaminating the source. The system must install a testable, non-venting double check valve to protect the source as seen in the attached guidance for Raw Water Sample Taps. Photographic evidence or an itemized contractor's invoice must be submitted by the due date. If there is a testable back flow prevention device present that the assessor may have missed, please provide photographic evidence by the due date.	12/17/2020

ITEM NO.	Sanitary Defect and Corrective Action	Due Date
L2A(10/NWSI/2017) Item No. 2	During the Level 2 Assessment the assessor noticed there was no backflow prevention device present besides a check valve in the Indian Spring 4 Well (WL009). Check valves within wells can fail, meaning that if the system loses pressure water within the distribution system can be back siphoned into the well, potentially contaminating the source. The system must install a testable, non-venting double check valve to protect the source as seen in the attached guidance for Raw Water Sample Taps. Photographic evidence or an itemized contractor's invoice must be submitted by the due date. If there is a testable back flow prevention device present that the assessor may have missed, please provide photographic evidence by the due date.	12/17/2020
L2A(10/NWSI/2017) Item No. 3	Previous Level 2 Assessments have identified the lack of backflow prevention devices in the distribution system as a sanitary defect. A February 2019 Consent Order, and June 2020 First Amendment and Restatement of the Consent Order requires that all service connections must be equipped with proper backflow prevention devices. The PWS is currently in the process of installing these devices on all service connections, which must be completed by the December 2020 deadline.	12/1/2020
L2A(10/NWSI/2017) Item No. 4	There has been isolated pressure drops on Governor Paine Rd where the line break was. Though the PWS has an Operation and Maintenance manual to deal with service line breaks and repairs, the PWS needs to develop a way to add disinfectant to the public water supply in these instances to prevent bacterial contamination. The PWS must provide a Corrective Action Plan detailing this process by the due date.	12/20/2020

During the October 8, 2020 Level 2 Assessment, the assessor (Chris Allbee) was informed that "the operator for this PWS has been instructed to direct all concerns and communications regarding the operating status of the water system to the Prudence Island Water District Board. The Board is then responsible to inform RIDOH of any and all reportable matters concerning the status and operating condition of the PWS". The Rhode Island Department of Health will be looking into this matter.

#### Recommendations

The region is experiencing a drought. During prolonged periods of Drought, the PWS should review drought management guidance in the emergency response plan. Additionally, the PWS needs to ensure that proactive messaging about water restrictions are received by all residents served by the distribution system.