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TTY: 711  
[www.health.ri.gov](http://www.health.ri.gov)

CERTIFIED MAIL

April 8, 2020

Robert Marshall  
P.O. Box 93  
Prudence Island, RI 02872

RE: Level 2 Assessment for RI1592023 - Prudence Island Water District

Dear Mr. Marshall:

In order for your system to return to compliance, the items listed on the Inspection Response Form (Response Form) must be corrected and/or addressed.

If sanitary defects are observed during the Level 2 Assessment (L2A), the public water system (PWS) will have until the assigned due date to correct the defect or address it in a Corrective Action Plan (CAP) detailing when the corrections will occur. Some items may already have been addressed and/or corrected prior to receipt of this form. If so, please notify RIDOH that the item(s) have been corrected. RIDOH must be notified in writing when each defect is corrected.

Level 2 Assessment Instruction Form

PWS ID Number: RI1592023

PWS ID Name: Prudence Island Water District

**PARTIES PRESENT**

NAME	ORGANIZATION
William Capron	Prudence Island Water District


Please review the items listed on the Level 2 Assessment Response Form. As each item is completed, you must notify Garth Hoxsie-Quinn in writing (via email at [Garth.HoxsieQuinn@health.ri.gov](mailto:Garth.HoxsieQuinn@health.ri.gov)) and provide either photographic evidence or a copy of the itemized contractor invoice. Once all items have been completed, submit the Response Form with the appropriate dates and system official's initials in the "Completed" box (far right column).

For questions regarding your coliform sample plan or schedules, please contact the Revised Total Coliform Rule Manager by phone at 401-222-6867.

PWS ID: RI1592023

Please feel free to contact the Center for Drinking Water Quality at (401)222-6867 with questions or to obtain additional guidance regarding this report and our findings. Thank you for your time and continued cooperation.

Sincerely,



Garth Hoxsie-Quinn  
Senior Environmental Scientist  
Rhode Island Department of Health  
Center for Drinking Water Quality

Enclosures: Level 2 Assessment Response Form  
Completed Level 2 Assessment Form

Cc: Main File  
Sanitary File  
Robin Webster, Prudence Island  
Will Capron, Prudence Island Water District  
June Swallow, RIDOH  
Amy Parmenter, RIDOH  
Lecanne Black, RIDOH  
Carlene Newman, RIDOH

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**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 March 31, 2020 L2A 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 initial the column on the column below once the repairs are made submit a copy this form with the written response and/or photographic evidence.

This office must be notified of any modifications to your system as per 216-RIRC-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 system. Routine maintenance on a water system, such as pipe and valve replacement or repair does not need to be reported.

An In-Kind Replacement form must be submitted for replacement of pumps, storage/pressure tanks or treatment components that are functionally equivalent to the original components

Attach an additional sheet if more room is required.

*L2A-9 requires the submittal of a written notice of understanding (NOU) for sanitary defects that were identified by the PWS. All NOU's must be combined into one document but cannot simply say "I understand the before mentioned actions". Please indicate what actions will be taken in the future to avoid these sanitary defects.*

**Compliance Schedule and Corrective Action Table**

ITEM NO.	Sanitary Defect and Corrective Action	Due Date
L2A(9/PIWD/2017) Item #1	Though proper protocol was followed, the faucet had been taken apart by the homeowner. This left only a flexible rubber tube with a metal insert on the end that needed to be disinfected prior to collecting the sample. This sample site is also not part of the approved Coliform sample plan. In the future, samples must be collected from faucets that are fully assembled and can be properly disinfected. In a situation such as the one above, RIDOH must be contacted prior to collection of samples, especially if the sample site is not part of the approved coliform sample plan. The operator must provide a written notice of understanding of the above.	4/30/2020
L2A(9/PIWD/2017) Item #2	A secondary line on the John Oldham Rd had to be de-pressurized to conduct a repair. This line is a dead-end line. All main lines and secondary lines remained fully pressurized. When conducting line repairs that require portions of the system to be de-pressurized, it is important to follow the AWWA guidance (including ensuring that proper contact time can be achieved for disinfection to occur). The operator must provide a written notice of understanding of the above.	4/30/2020

L2A(9/PIWD/2017) Item #3	There was only one customer present on John Oldham Rd, the site of the original sample. The customer returned to Massachusetts. No RPOR or RPOT could be taken from this road since no customers were present, no houses were open or occupied. A sample was taken from a customer on the main line closest to the upstream from the secondary line on John Oldham Rd. To prevent this situation from happening again, the PWS must contact RIDOH at 401-222-6867 and ask to speak with the RTCR manager if they are not able to collect samples for any reason. The operator must provide a written notice of understanding of the above.	4/30/2020
L2A(9/PIWD/2017) Item #4	Only the John Oldham Rd line was de-pressurized for a repair. This is a secondary line that dead ends at the end of the road. The sample collected upstream was absent as noted above.	4/30/2020
L2A(9/PIWD/2017) Item #5	There was a leak in the line on John Oldham Rd. The leak was repaired on 3/26/2020 which was what prompted the collection of the sample.	Corrected 3/26/2020
L2A(9/PIWD/2017) Item #6	The tap was unsuitable as a sample tap. It was a no win situation for the operator. There was only one customer using the water line, there were no other options to take the sample after the line was re-pressurized. RIDOH is aware that these types of situations happen. It is important for the Operator to communicate these difficulties prior to a situation of this nature happening. The operator must provide a written notice of understanding that they will communicate with the state when these types of situations arise.	4/30/2020
L2A(9/PIWD/2017) Item #7	There is no backflow prevention device for 0124 John Oldham Rd (where the sample was collected). Previous Level 2 Assessments have identified the lack of backflow prevention devices as a sanitary defect. A February 2019 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 August 1, 2020 deadline.	8/1/2020