State of New Jersey Department of Environmental Protection Division of Water Supply and Geoscience Bureau of Safe Drinking Water

Capacity Development Program

ANNUAL REPORT ON

ONGOING IMPLEMENTATION

OF THE

CAPACITY DEVELOPMENT PROGRAM

Period of July 1, 2012 to June 30, 2013

August 2013

Chris Christie Governor Bob Martin Commissioner

Kim Guadagno Lt. Governor

IMPLEMENTATION REPORT

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Introduction

The 1996 Amendments to the Federal Safe Drinking Water Act (SDWA) created a focus on ensuring and enhancing 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 for addressing capacity determinations for new systems and the application of the approved strategy for existing public water systems.

In accordance with Section 1420(a) of the SDWA, which requires each state to have the legal authority to assure that all new community and non-transient non-community water systems demonstrate adequate technical, managerial and financial capacity, the New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A) was amended on August 2, 1999 (P.L. 1999 Chapter 176). 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 non-transient non-community water systems have adequate capacity. In addition each state is required to develop and implement a strategy to assist existing systems in acquiring 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 August 2009.

In the 1996 amendments to the SDWA, Congress ensured that each State would establish a Capacity Development Program by tying capacity development to the Drinking Water State Revolving Funds. If New Jersey had not obtained legal authority to ensure that all new community and new non-transient non-community water systems demonstrate technical, managerial and financial capacity (Section 1420(a)), or had not developed and implemented a Capacity Development Strategy (Section 1420(c)), New Jersey would receive only 80 percent of its Annual Capitalization Grant allotment from the USEPA (Section 1452(a)(1)(G)). This means that New Jersey's allocation of funds for the Drinking Water State Revolving Fund and set-asides would have been reduced by up to \$3-4 million dollars per year.

This report will review the activities conducted by the Department from July 1, 2012 through June 30, 2013 regarding implementation of the Capacity Development Program.

New System Approval – Community Water Systems

Community Water Systems

The Department did not add any new community water systems to its inventory of public water systems during the period of July 1, 2012 through June 30, 2013. To date, no new

community water system proposals have been denied approval based on TMF requirements.

New System Approval – Non-Transient Non-Community Water Systems

Non-Transient Non-Community Water Systems

New Jersey added nine (9) non-transient non-community water systems to its inventory of public water systems during the period of July 1, 2012 through June 30, 2013. Four (4) of the 9 systems are pending TMF approval by the Department. These systems were newly constructed or their infrastructure was expanded such that they were classified as a non-transient non-community water system and consequently require a TMF review under New Jersey Safe Drinking Water Act Regulations at N.J.A.C. 7:10-13.

The remaining five (5) systems did not meet the definition of "new system." These 5 systems were existing transient non-community water systems that were reclassified to non-transient non-community water systems. Table 1 lists the non-transient non-community water systems added to the water system inventory.

Table 1 New Non-Transient Non-Community Water Systems And Pending TMF Approvals

PWSID No.	SYSTEM NAME	START DATE	COMMENTS
1603304	North Haledon First Presbyterian Church	07/05/2012	New infrastructure; TMF approval pending
1902363	Bridgeway Rehabilitation Services	09/25/2012	New infrastructure; TMF approval pending
1704317	Hope Creek – LDC 1	12/11/2012	New infrastructure; TMF approval pending
1021438	Kuhl Corporation	03/07/2013	New infrastructure; TMF approval pending
1912329	Hopatcong Head Start	03/01/1991	Existing infrastructure; Reclassified T to NT No TMF required
0805440	Franklin Township Board of Education	06/01/1994	Existing infrastructure; Reclassified T to NT No TMF required
0332326	A Childs Place	09/01/1992	Existing infrastructure; Reclassified T to NT No TMF required
1922398	Someplace Special Square- Condo Assoc.	11/27/2007	Existing infrastructure; Reclassified T to NT No TMF required
1434329	McWilliams Forge Company Inc.	03/01/2001	Existing infrastructure; Reclassified T to NT No TMF required

July 1, 2012 – June 30, 2013

Key: PWSID – public water system identification number assigned by the Department based on the location of the water system; **CWS** — community water system; **T** — transient non-community water system; **NT** — non-transient non-community water system; **TMF** — technical, managerial & financial

To date, no new non-transient non-community water system proposals have been denied approval based on TMF requirements.

Work Plan Activities

The Capacity Development Program SFY 2013 Work Plan was submitted to USEPA on May 1, 2012. The following is a list of tasks included in the Capacity Development Program SFY 2013 Work Plan and a review of New Jersey's accomplishments and projected tasks for the year:

1. Prepare the SFY2013 Annual Report that documents the ongoing implementation of the capacity development program for addressing capacity determinations for new systems and the application of a focused effective strategy for existing public water systems. This report is due by August 2013.

The SFY2013 Annual Report was finalized and sent to USEPA on August 13, 2013.

2. Assist the Drinking Water State Revolving Fund (DWSRF) program in updating the FFY2014 set-aside section of the Intended Use Plan and submit work plans to USEPA as prerequisites to apply for the DWSRF Capitalization Grant. These tasks are to be completed in 3rd quarter SFY2013.

The Capacity Development Program provided its components for the FFY2014 Intended Use Plan in March 2013 and the SFY2014 Work plans in May 2013 to the DWSRF Program.

- 3. Continue the process of conducting on-site capacity evaluations for the 36 priority community and 29 non-community water systems on the August 2010 Strategy List, if not completed prior to June 30, 2012. This will be performed on an ongoing basis.
- 4. Initiate process of conducting on-site capacity evaluations for the remaining community and non-community water systems identified on the 2010 Strategy List. This will be performed on an ongoing basis.

Appendix I of this report provides a summary and status of Capacity Development Program activities for all of the community and non-community water systems from the 2010 Strategy List.

Twenty-seven of 36 community water systems were removed from the 2010 Capacity Development Priority List for Community Water Systems as No Further Action was needed. The remaining nine systems on the list have made progress but will continue to be monitored by the Capacity Development Program and were placed on the new 2013 Capacity Development Strategy List.

All twenty-nine systems were taken off the 2010 Capacity Development Priority List for Non-community Water Systems as No Further Action was needed for these systems.

5. Provide direct technical assistance to those water systems that fail to demonstrate adequate technical, managerial, and financial capacity. This function will be performed on an ongoing basis and will attempt to cooperatively incorporate the use of technical, managerial and financial assistance. Technical assistance will include direct consultation to assist targeted water systems to comply with existing regulations regarding construction and operation. Managerial and financial assistance will attempt to incorporate the concepts of Asset Management to establish water system priorities in maintaining, refurbishing, and replacing needed infrastructure. Once these priorities are determined, the water system can then develop meaningful projections of expenses and evaluate how to garner the revenues needed to effect improvements. USEPA's Simple Tools for Effective Performance (STEP) Guide Series, Check Up Program for Small Systems (CUPSS), or similar tools/software will be used when appropriate. The program anticipates becoming involved in meaningful rate setting discussions, when needed, so that targeted water systems can themselves determine how best to accrue the funds required to maintain their water system.

The Capacity Development Program provided direct assistance to the community water systems and non-community water systems on the 2010 Strategy List, as summarized in Appendix I. Additionally, staff performs capacity development reviews on other systems as needed. Some systems that received assistance were New Lisbon Developmental Center and Triplebrook Family Campground. Currently, three systems that are receiving assistance for water quality issues are Belmar Borough, Lake Como Borough and Avon Borough. Staff performed background research, conducted TMF capacity evaluations and site visits, developed presented and helped systems implement improvement plans. Staff also facilitated meetings among system representatives (e.g., owners, managers, licensed operators, and consulting engineers), regulatory agencies (e.g., enforcement inspectors, compliance managers, and permit reviewers), and/or representatives from other public water systems to identify/evaluate alternatives and approaches for developing system capacity.

The Capacity Development Program continues to advise systems of the potential to use various asset management plan software and financial planning tools from the Environmental Finance Centers (EFC) such as AM KAN WORK!, Rate Check Up, EFC Financial Dashboard, and Utility Budgeting Workbook.

6. Contingent on receiving management authorization to proceed, the program plans to spend \$250,000 of previously awarded grant money to engage one or more third-party contractors to assist in providing on-site capacity evaluations, on-site technical assistance, and rate setting advice in SFY2013. The program will execute, manage, and coordinate service contracts to achieve this goal.

No work was performed for this proposed contract. Instead, a scope of work/request for proposal was developed and will take the place of this activity. See below.

7. A scope of work/request for proposal to conduct TMF site visits was sent to the Department of the Treasury in SFY2010. The BSDW is currently awaiting managerial approval for the proposal. If the RFP is awarded, the selected contractor will conduct TMF capacity evaluation site visits; and subsequent asset management and rate setting development as identified with Program staff.

In June 2010, the Capacity Development Program was informed by the Treasury Department that the Governor's office approved authorization of the Department's RFP designed to solicit bids for the conduct of site visits, TMF capacity evaluations, and asset management plan development and implementation by a third-party contractor. However, the Capacity Development Program recognized the need to modify the scope of work, further refine the procedures, and update/enhance the various forms which would be integrated into the RFP, including development of the "Technical, Managerial, and Financial Capacity Evaluation & Benchmark Criteria Assessment Form" contained in Appendix II of the 2011 edition of this report. This RFP is under review for revision by the capacity development staff and Departmental management review.

Capacity development staff is negotiating a fee for services. Resources for Communities and People Solutions (RCAP) proposal to work with selected very small systems (i.e., homeowners associations) to complete a systems O&M plan and an asset management worksheet with information inputted into CUPSS.

In addition, our previous Engineering Initiative Assistance contract overseen by the Drinking Water State Revolving Fund (SRF) Unit was completed in SFY2011. This contract with New Jersey Water Association provides funds and assigns engineers for the design and permitting of improvements at those small systems serving fewer than 3,300 residents. This program was designed to assist Drinking Water State Revolving Fund Ioan applicants. Although the funds for the contract services are

provided through the Small System Technical Assistance Grant, the Capacity Development Program oversees the contract services. We propose to renew and enhance this contract, which will continue to cover the "soft" costs and preserve the systems' limited funding source alternatives for construction, operation, and maintenance of infrastructure needed for compliance. A spending plan was approved for this new contract and a new \$400,000 asset management review contract. We hope to have these contracts in place in SFY2014.

8. Process technical, managerial, financial evaluations consistent with applicable State regulations (N.J.A.C. 7:10-13) for new community water systems, and non-transient, non-community water systems as identified by the Department and/or County Environmental Health Act (CEHA) agencies. This will be performed on an ongoing basis.

The Department did not add any new community water system to its inventory of public water systems during the period of July 1, 2012 through June 30, 2013.

New Jersey added nine (9) non-transient non-community water systems to its inventory of public water systems during the period of July 1, 2012 through June 30, 2013. Four (4) of the 9 systems are pending TMF approval by the Department. These systems were newly constructed or their infrastructure was expanded such that they were classified as a non-transient non-community water system and consequently require a TMF review under New Jersey Safe Drinking Water Act Regulations at N.J.A.C. 7:10-13. The remaining five (5) systems did not meet the definition of "new system." These 5 systems were pre-existing water systems that were recently determined to be non-transient non-community water systems; were existing transient non-community water systems. Please refer to Tables 1 and 2.

9. Arrange for seminars, workshops, and/or webcasts to provide training on how to evaluate and develop technical, managerial, and financial capacity; implement asset management planning, utilize asset management tools such as CUPSS; and obtain stakeholder input on the revised capacity development strategy and capacity development benchmark document.

Presentations were made at various venues, such as Rutgers University Safe Drinking Water Act Update, the New Jersey Section of the American Water Works Association Annual Conference and various New Jersey Water Association seminars. Financial seminars to be hosted by New Jersey Water Association and the Department are scheduled for September 2013.

The Capacity Development section worked with two entities that received grant monies from USEPA this fiscal year to provide technical assistance to small systems. For two weeks in April (weeks of April 1st and 15th), Andrew McBride from Texas

A&M Engineering Extension Service came to NJ to work with a selected group of small systems to draft a system Operations and Maintenance manual (O&M Plan). The O&M Plan is a state requirement of the licensed operator for the system that they operate. Mr. McBride sat down with Woodstown Borough, Pennsville Township, Elmer Borough, Paulsboro Borough, Ellenwood Mobile Estates, Greenwich Township, Berkeley MUA, Ocean Gate Borough, Pine Beach Borough and Washington Twp. MUA o draft the O&M Plans. The Capacity Development staff is continuing to work with these systems to complete the O&M plans. Three O&M plans have been completed to date for Paulsboro Borough, Pine Beach Borough and Woodstown Borough.

On June 5th and 6th, Heather Himmelberger from Southwest Environmental Finance Center (EFC) and Melissa Young from Syracuse EFC came to NJ for two one day sessions to talk about asset management plans (AMP) and have selected water systems start to work on an AMP template. The systems were given copies of the AM Kan Work! Software and guidance and an AMP template that Ms. Himmelberger created for the NJ sessions. Systems that took part in this initiative were: Clayton Borough, National Park Borough, Pitman Borough, Swedesboro Borough, Westville Borough, Ocean Gate Borough, Elmer Borough, Washington MUA and West Milford MUA. Six systems that were invited were unable to attend and the AMP template and DVD was sent to them on June 12, 2013. The Capacity Development staff is continuing to work with these systems to complete the AMP template and have the systems continue to work on an AMP.

Reporting Criteria

In this Section of the Report, the Department provides responses to the Memorandum from Cynthia C. Dougherty, Director, Office of Ground Water and Drinking Water, USEPA, Washington, D.C. dated June 1, 2005 and the questions highlighted in the prepared "Reporting Criteria for Annual State Capacity Development Program Implementation Reports" as follows:

• Has the State's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year?

The Department's regulations (N.J.A.C. 7:10-13) pertaining to the requirements of technical, managerial, and financial (TMF) capacity for new community and non-transient non-community water systems were readopted <u>without</u> changes effective April 30, 2010. These rules will expire April 30, 2017.

 Have there been any modifications to the State's control points? If so, describe the modification and any impacts these modifications have had on implementation of the New System's program. No changes have occurred in the past year. In 2006, the Department made a modification to one of the State's control points: the Department began to issue PWSID identification numbers to new non-transient non-community water systems that commenced operation but have not satisfied the TMF requirements. This change allowed the Department to receive and process monitoring data for compliance evaluation purposes during the TMF review. Typically, when the Department assigns a PWSID number, the system is permitted to commence operation only after satisfaction of the TMF requirements. The limited application of this change has not adversely affected the Program.

• Indicate whether any new system approved within the past three years under the Capacity Development Program has been on any of the annual Significant Non-Compliers (SNC) lists. [Note: the Significant Non-Complier list has been replaced by the Enforcement Targeting Tool, or ETT]

None of the new community and non-transient non-community water systems which received TMF approval since June 30, 2009 is on the current Enforcement Targeting Tool list (which has replaced the SNC list).

• 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?

The Department has observed improvements in public water system compliance and attributes this improvement to improved data management capabilities and the successful implementation of the efforts and mechanisms under the Capacity Development Program, the Enforcement Program, Small Water System Technical Assistance Program, and Operator Certification Program. The Capacity Development Program is making progress in addressing non-compliance which continues to promote TMF capacity.

The significant elements that have brought about a higher level of compliance are detailed in the Governor's Report for calendar year 2011 and include:

- Zero Tolerance Policy;
- Operator Certification Program (extended to non-transient non-community water systems);
- Monitoring Schedules more readily available through the Department's website (via the Drinking Water Watch application);
- Technical Assistance by the Department;
- Violation evaluation;
- Improved data management;
- Maintenance of an accurate inventory of systems and the status/appropriateness of violations;

• Implementing the activities of the Capacity Development Strategy.

In SFY10, the Department began requiring water systems to submit drinking water data electronically through the Department's Electronic Environmental (E2) Reporting System. Certified drinking water laboratories submit the data on behalf of the water systems. Monitoring and reporting compliance has increased as a result of this reporting requirement. Recent enforcement of the mandatory reporting deadlines for test results has resulted in fewer monitoring and reporting violations.

• 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 is through the preparation of a Strategy List which 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 for performing TMF capacity evaluations and providing assistance.

The first strategy list was compiled in December 2001 from a review of the compliance status during the preceding 18-month timeframe from July 2000 – December 2001. The second strategy list was compiled in February 2004 from a review of the compliance status during the 18-month timeframe of January 2002 – July 2003. An Interim 2007 Strategy List was developed as reported in August 2007. The list included high priority systems from the 2001 and 2004 lists that remained unresolved and out of compliance at that time. Additionally several systems, such as Sea Village Marina, were added based on staff's knowledge of the system. This list was adopted as the Final 2007 Strategy List as indicated in the SFY2008 Annual Report. The status for each of the 39 public water systems on the Final 2007 Strategy List is provided in Appendix I of this report.

The 2010 Strategy List identifies 65 community and non-community water systems as High priorities for receiving assistance from the Program to develop their TMF capacity. This list was compiled in July 2010 from a review of the compliance status during the 18-month timeframe of January 1, 2008 – June 30, 2009 and includes systems identified by referrals from the compliance, permitting, enforcement, and technical assistance bureaus within the Department.

The 2013 Strategy List is newly created and is located in Appendix II of this report. The List identifies 20 community and non-community water systems as priorities for receiving assistance from the Program to develop their TMF capacity. This list was compiled in July 2013 from a review of the compliance status during a 12 month timeframe, utilizing the ETT tool and also includes systems identified by referrals from the compliance, permitting, enforcement, and technical assistance bureaus within the Department. Additionally, as water quality issues and other problems occur where water systems need assistance from the Department, these are prioritized by the capacity development staff.

• 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 Capacity Development Program continues the process of performing background research; conducting TMF capacity evaluations and site visits; developing improvement plans; and helping systems implement those improvement plans. Staff also facilitated meetings among system representatives (e.g., owners, managers, licensed operators, and consulting engineers), regulatory agencies (e.g., enforcement inspectors, compliance managers, and permit reviewers), and/or representatives from other public water systems to identify/evaluate alternatives and approaches for developing system capacity. During this process, the Capacity Development Program relayed information on available tools and resources and provided training sessions at numerous locations and forums.

In order to improve water system operation, the Department identified drinkingwater related training needs for small water system owners and operators. By contract with the New Jersey Water Association, 39 training sessions were held in the past year to provide assistance to small water systems (those serving less than 10,000). Two hundred (200) small systems were represented at these sessions. In addition, a contract with Rutgers University provided for a 50% tuition subsidy for drinking water-related training courses from July 1, 2012 to June 30, 2013. In that timeframe, 30 training courses were held. Four hundred twenty-eight (428) operators attended at the reduced rate. An agreement with the New Jersey Section AWWA provided for four training seminars in the past year. A total of 209 individuals attended. The Department is currently in the process of renewing the Rutgers University contract to cover tuition subsidies through FY2015, and plans to renew the agreement with New Jersey Water Association in FY2014 for an additional 70 training sessions over two years.

In addition, inventory information and monitoring schedules for all public water systems continue to be available through the Division of Water Supply and Geoscience's Drinking Water Watch application. http://www.nj.gov/dep/watersupply/waterwatch. These schedules are continually updated based on population changes, treatment installation compliance status and error corrections. These schedules benefit the Capacity Development program because they inform the water systems regarding the type of compliance monitoring required and the associated sampling frequencies which help the systems maintain compliance. This tool benefits both the community water systems and noncommunity water systems alike.

In order to provide assistance to water systems with regards to the rates charged for water, in SFY13, the Department spent time investigating New Jersey's community system's water rates. This rate data was sent to EFC, which has agreed to perform data entry and analysis, similar to its work for North Carolina and other States, under an existing EPA grant for such support. Main data entry was completed by end of March, with the dashboard expected by the end of the summer. This will be a resource for community water systems to compare other system's rates to help in making decisions about full cost pricing for their water.

• 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 Program conducted a review of the process used to develop its Strategy List for existing systems in SFY2010 as discussed in the Work Plan Activities section of the 2010 report as well as Appendices I and III of the 2010 report. The Department will reevaluate the strategy on an ongoing basis, as needed.

• Did the State make any modifications to the existing system strategy?

No modifications have been made, other than to continue upgrading and enhancing the "Technical, Managerial, and Financial Capacity Evaluation & Benchmark Criteria Assessment Form" contained in Appendix II of the 2011 report, which serves as a companion document to the Criteria and Benchmarks for Technical, Managerial, and Financial (TMF) Capacity document previously submitted as Appendix IV of the 2010 Annual Report. The Capacity Development Program intends the form for use by staff and its contractor (pending award of the RFP previously discussed), and as a self-assessment tool for systems that are not identified for capacity development assistance under the approved Capacity Development Strategy.

The Department is continuing with a previous Strategy modification to prepare a new Strategy list once every three years. This adaptation in preparing the Strategy List will continue and allows efforts regarding the TMF evaluation and improvement process to be implemented with more efficiency. This modification favorably affects the implementation of the Program by focusing efforts on TMF evaluations and technical assistance.

APPENDIX I

CAPACITY DEVELOPMENT PROGRAM STATUS OF ACTIVITIES FOR SYSTEMS ON 2010 STRATEGY LIST and CLOSE OUT OF LIST

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	<u>CURRENT STATUS/PLAN</u>	
NJ0108021	SEA VILLAGE MARINA	Listed in 2007. Ongoing radionuclide (gross alpha) maximum contaminant level (MCL) violations and exceedances of NJ secondary standards for sodium and total dissolved solids (TDS). Lead and copper treatment never permitted as final. Only one well that may be also ground water under the influence of surface water (GWUI). Inadequate storage and auxiliary power. Technical, managerial and financial (TMF); ownership; and legal problems.	Water main constructed and connection to NJAW completed and operational on October 25, 2012. No further action (NFA)	
NJ0112002	BLACK HORSE MANOR	Listed in 2007. Lead and copper Action Level Exceedances (ALE) & subsequent Monitoring and Reporting (M/R) violations. Financial problems.	New well & facilities in place; O&M Manual submitted to DEP 12/12/2011.System has achieved compliance with Lead Action Level. NFA	
NJ0248001	RAMSEY WATER DEPT	Arsenic MCL violations (see PEA080010)	Received SRF loan to install required treatment which was constructed and in use on 12/17/09 (permit WCP060001). No pending violations. Internal discussions indicate TMF evaluation is not required at this time. NFA	
NJ0251001	RIDGEWOOD WATER	Previously listed in 2001, 2004 and 2007.	Progress in numerous areas such as ground water under the direct influence of surface water (GWUDI) testing on source wells, repairs to well houses, O&M manual, and initiatives to enhance GIS asset inventory and integrate it into an asset management plan using SEMS Software Suite. System has shown improvement. NFA	
NJ0301001	BUTTONWOOD MOBILE HOME PARK	Referred to CD Program by Southern Enforcement and Safe Drinking Water Implementation for deficiencies in all TMF areas. Aging infrastructure, poor O&M, no licensed operator, not issuing CCRs, no storage (2 wells & auxiliary power, but no waiver requested/issued), no meter	System has since hired a licensed operator, but overall management & financing continue to be inadequate. Notice of Noncompliance issued 04/19//2013 for radionuclide MCL. System moved to 2013 Capacity Development Strategy List for further evaluation.	

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
		to measure flow, etc.		
NJ0303001	BORDENTOWN WATER DEPARTMENT	Radionuclide contamination in all 4 source wells with Gross Alpha (GA) & Ra226/228 MCL violations in 2008. Improper chlorination/post-disinfection.	Communicated extensively with appropriate DEP bureaus. Operational measures (well 5 last on/first off) and incidental treatment of radionuclides by greensand filters brought system back into compliance with GA & Ra226/228 MCLs. Permit WCP100001 completed 12/15/10 to address disinfection issues. O&M manual prepared. NFA	
NJ0339001	NEW LISBON DEVELOPMENTAL CENTER	Listed in 2007. Lead action level exceedances. Numerous monitoring and reporting violations (late & non-submittal).	Efforts from 2008 to present include site visits, meetings, & calls with representatives of this State-run facility, the licensed operator, compliance manager, enforcement inspector, & permitting staff. On track to upgrade water system; Well #3 decommissioned, tank rehab under construction, design underway for installation of needed chlorine contact time and lead faucets were replaced. Continued follow-up warranted. System moved to 2013 Capacity Development Strategy List for further evaluation.	
NJ0436007	WINSLOW TWP DMU	Listed in 2007. Ongoing radionuclide MCL violations at various points of entry. Volatile organic chemical (VOC) MCL violations at some points of entry.	NFA Return to compliance on MCLs, Administrative Consent Order (ACO) on Wells #1 & #8 closed 2/2/2011. Permit No. WCP110003 issued 5/18/2011 to construct radionuclide treatment at Wells 3, 7 & 9. Treatment online and ACO terminated 03/17/13.	
NJ0601001	BRIDGETON CITY WATER DEPT	Listed in 2007. Ongoing radionuclide MCL violations at various points of entry.	Project to route contaminated water from wells 18 & 19 to newly constructed treatment plant TP015040 complete and units operational on 5/19/09. Monitoring shows potable water from TP015040 is below Gross Alpha & Combined Radium MCLs. The 12/14/07 ACO was terminated on 5/19/09. Additional work outside of ACO per permit WCP090002 for radionuclide treatment on well 13 which currently meets MCL, but projected to exceed MCL in near future. ARRA funds secured to rehab existing 2.5 million gallon ground storage tank and construct 0.75 million gallon tank. Construction completed. NFA	

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
NJ0612001	BAYSHORE MOBILE HOME PARK	Listed in 2007. One well with nitrate MCL violations and second well with extremely high sodium levels exceeding the NJ secondary standards.	ACO closed 8/9/2012 and construction at wells & WTP complete. Outstanding Department action items involve issuing a storage waiver and completing review of the updated/ revised O&M manual. Lead Action Level exceedance and corrosion control recommended. Continued follow-up needed until all issues resolved and storage waiver approved. System moved to 2013 Capacity Development Strategy List for further evaluation.	
NJ0613004	UPPER DEERFIELD TWP WATER DEPT	Gross Alpha and Radium 226/228 MCL violations.	Radium treatment installed at Love Lane & Seabrook Plant, ACOs closed 12/2/2011 and 3/12/2012.	
NJ0614003	VINELAND WATER & SEWER UTILITY	Gross Alpha and Radium 226/228 MCL violations at multiple TPs & M/R violations.	Radium treatment at multiple treatment plants installed. Vineland continues to update WTPs as needed. NFA	
NJ0614005	FAIRVIEW MANOR MHP	Volatile Organic Compound (TCE) MCL violations.	System has completed actions necessary to achieve compliance. ACO closed 3/23/09. NFA	
NJ0811003	COLONIAL ESTATES	Listed in 2007. Ongoing radionuclide and mercury MCL violations.	System is connected to Monroe MUA and out of the water business effective 7-3-12. NFA	
NJ1001301	VALLEY VIEW MANOR	Listed in 2007. Arsenic MCL violations.	System completed installation of arsenic treatment in 12/2010 per permit modification WCP100001 approved 6/3/10. NFA	
NJ1007002	ROSEMONT WATER	Arsenic MCL violations	System completed installation of Isolux treatment per WCP080002 in12/2009.	
NJ1009001	FLEMINGTON WATER DEPARTMENT	Listed in 2007. Arsenic MCL violations.	Arsenic removal addressed at several wells; ACO terminated 06/22/2012.	
NJ1013001	HAMPTON BOROUGH	System lacks firm capacity, only has 1 operational well, and no approved contract for the interconnection with Glen Gardner.	Applied financial assistance thru DWSRF program on 10/3/2011 to construct a backup well. System has designed back up well and expected to be under construction by end of 2013. System moved to 2013 Capacity Development Strategy List until back up well is completed.	
NJ1024002	HUNTERS GLEN	System recently classified as CWS and did not meet rule requirements.	Subsequent legal involvement with DAG led to reversal of decision and system re- classified as nonpublic system not subject to rules. Inactive as of 1/5/11. NFA	

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
NJ1336308	LIBERTY ROYAL REHAB CENTER	Listed in 2007. Acute coliform MCL violations.	Initial TMF capacity evaluation site visit conducted in 9/08. Follow-up visit conducted 12/22/09 in conjunction with Central Water Enforcement annual inspection. Efforts focused on re- evaluating connection w/ NJAW (PWSID# NJ1345001). Became inactive 5/26/11. NFA	
NJ1414009	MOUNTAIN SHORE WATER SUPPLY	Referred to program by Northern Water Enforcement. Facility lacks auxiliary power, distribution system is antiquated, only 1 well. Financial problems.	System intends to connect with Jefferson Twp. Water Department, but does not have the capital to pay for fees and connection costs. Jefferson Township representative has indicated that Jefferson Township is indeed interested in connecting Mountain Shore to its Lake Hopatcong system. Funding remains an issue. System has applied for funding thru the SRF Small System Loan program. Follow up required. System moved to 2013 Capacity Development Strategy List until connection to Jefferson Twp. is complete.	
NJ1414013	SUN VALLEY PARK	Listed in 2001, 2004, & 2007. Using an unapproved source. Undersized mains and inadequate storage. Lacks adequate firm capacity to meet peak daily demand.	Initial TMF visit on 06/12/09. All subsequent follow-up activities focused on assisting owner with submission of required permit applications and discussion of best alternative for developing long-term financial viability of the system. Permit WCP005070 issued 6/3/2011 to operate Well No. 1; Permit WCP110001 issued 2/16/2012 to build Well No. 2 and operate permit issued 3/8/2013. Storage waiver issued 03/08/2013. ACO terminated 04/24/2013 NFA	
NJ1421305	GREEN BRIAR RESIDENTIAL HEALTH	Referred to program by Northern Water Enforcement. Coliform violations require installation of chlorination, permit is technically deficient. Facility has 1 source, lacks firm capacity, adequate storage, and auxiliary power.	Treatment installed. Permanent connection for emergency generator installed. Dual pump assembly installed. NFA	
NJ1427002	MOUNT OLIVE - GOLDMINE ESTATES	Listed in 2007. Well no. 1 does not recover during high demand. Well no. 2 (irrigation well) not permitted for potable use. Used tanker for temporary storage in 2005 & NFA 2006.	NFA Interconnection completed 09/27/2011 with Tinc Farm.	

2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN
NJ1438001	CLIFFSIDE PARK WATER ASSOC INC	Listed in 2007. Exceedances of NJ secondary standards for iron and manganese. Recent lead and copper Action Level exceedance. Corrosion control treatment system in use not permitted. Undersized mains and inadequate storage.	Program has attended multiple meetings with system, local officials, Washington Township MUA (WTMUA) and/or USDA. Continued assistance in implementing plans for WTMUA to acquire/operate the Cliffside Park system. ACO with Enforcement effective 12/12/2012.Got Highlands Waiver; construct permit #WCP130001 approved 04/17/2013. Follow up needed. System moved to 2013 Capacity Development Strategy List for further evaluation.
NJ1511011	LUXURY COMMUNITY MOBILE HOME PARK	Listed in 2007. Notice of Violation issued 3/27/07 for various violations	System returned to compliance for past TCR MCL violations on 12/9/08. Department performed initial TMF capacity evaluation site visit on 5/18/10 while conducting new well test - new well is operational & auxiliary power is installed (see WCP09003 & WCP100001). Deficiencies with sources of supply, backup power, and storage corrected by completing this work. Storage waiver approved 04/05/2011. NFA
NJ1521001	OCEAN GATE	Referred to program by BSDWI. Mains are 80+ years old, iron problems within the distribution system, and no financial capacity to maintain system.	Initial capacity development outreach on January, 2012. Hired part time LO and an O&M Manual was prepared. Staff attended asset management workshop Follow up needed. System moved to 2013 Capacity Development Strategy List for further evaluation
NJ1714003	BANCROFT NEURO HEALTH CENTER	Combination of Cu ALEs, M/R violations, and small system size placed this facility on list.	ACO for construction of multiple facilities closed 2/1/2012. A new source of water supply, Campus Well No. 3, has been sampled and inspected. Operate permit for well # 3 was issued Nov. 21, 2012. NFA
NJ1904004	NORTH SHORE WATER ASSOCIATION	Referred to program by Northern Water Enforcement. Facility lacks auxiliary power, distribution system is antiquated, only 1 well. Financial problems. Leaking oil tank contaminated well and treatment was installed by Spill Fund.	System is a participant in the engineering initiative contract and Crew Engineer is evaluating the improvements needed for the system. The system also has applied to the NJDEP DWSRF program to finance the needed technical improvements. ACO issued for nitrates exceedances on 06/05/2013. Test well to be drilled by the end of 2013. System is working towards compliance but follow up is needed. System moved to 2013 Capacity Development Strategy List until ACO is closed.
NJ1904008	WILLOR MANOR WATER CO	Referred to program by Northern Water Enforcement.	Extensive efforts afforded by DWSRF program to assist this system in the past

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
		Facility lacks adequate storage and auxiliary power, distribution system is antiquated, only 1 well. Financial problems.	including use of Engineering Assistance Contact to cover planning, design, and permitting. System opted not to close on DWSRF loan and is not pursuing alternate funding to construct this project. Resident suggested in 8/2010 letter that it may be preferable to see if each homeowner could install a private well and the water company be dissolved. An ACO dated 04/23/12 states that Willor Manor submitted fourteen (14) executed agreements including thirteen (13) from individual homeowners and one (1) from the owner of the current well agreeing to drill private wells, seal the current well and dissolve the public community water system. Willor Manor shall have the existing well properly sealed by a licensed well driller and then the water system is to be officially dissolved. Termination of ACO imminent. NFA	
NJ1912007	ARTHUR RD WELL ASSOC	DWSRF & Northern Water Enforcement referred to program to oversee/monitor connection to Hopatcong.	ACO effective 3/9/11 requires execution of Developer's agreement with Hopatcong by 4/1/11, connection within 90 days of Hopatcong pipes being accessible, and decommissioning their well(s) 90 days after connection. System connected to Hopatcong, wells replaced within development & well to be decommissioned. NFA	
NJ1920001	STILLWATER WATER DISTRICT 1	Listed in 2007. Ongoing radionuclide (gross alpha) MCL violations.	ACO effective on 4/9/09 and closed 2/11/11. TMF site visit - 5/29/09, Helped with treatment/permit issues & ARRA funding. WCP090001-Radium removal on Wells 5&5A (TP002007) approved 8/26/09 - operating 9/17/10. Attended 1/12/10 board mtg. to review improvement plan & discuss AMP w/ CUPSS Notice of Noncompliance sent on storage 12/09/11 & under review by Enforcement. NFA	
NJ1922008	VERNON WATER CO	Referred to program by Northern Water Enforcement. Facility lacks auxiliary power, water outages due to booster pump failure and main breaks. Well #11 exceeds Uranium MCL. Financial problems.	Now managed by Aqua via Permit WCP110001 approved 9/30/11, including auxiliary power at pump stations. Well #11 currently not in operation. NFA	

	2010 STRATEGY LIST HIGH PRIORITY COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
NJ1922009	VERNON WATER CO OAK HILL	Referred to program by NBWCE. Facility lacks auxiliary power and adequate storage. Financial problems.	Now managed by Aqua via Permit WCP110001 approved 9/30/11, including auxiliary power at pump stations. Well #11 currently not in operation. Connection addresses storage issues. NFA	
NJ1922010	THE VILLAGE OF LAKE GLENWOOD	Referred to program by Northern Water Enforcement. Firm capacity being re- evaluated by Department. Portion of distribution system in "Lower system" is above ground. Undersized mains exist.	Capacity Development site visit on 09/04/2012. ACO issued 5/31/2013 for deficiencies at wells # 1 and 2.While undersized mains may be hydraulically justified, concerns remain on their condition and location on private property. Buried storage tank will require unearthing to ensure its adequacy for sanitary purposes. System moved to 2013 Capacity Development Strategy List until ACO is closed and all deficiencies resolved.	
NJ1922014	GREAT GORGE TERRACE ASSO	Listed in 2007. Significant ongoing radionuclide MCL violations.	Extensive efforts by Northern Water Enforcement, BSDWI, and BSDWTA resulted in execution of ACO on 3/14/11 that calls for connection to UW-Vernon Valley (1922026). SRF loan will fund project and authorization to award the contract was issued by MF&CE on 3/31/11. Effective July, 2012, system has tied into United Water Resources and is no longer an independent public water system. NFA	
NJ1922028	VALLEY VIEW APTS	Listed in 2004 & 2007. Uranium MCL violations at two points of entry.	Extensive efforts by Northern Water Enforcement, BSDWI, and BSDW resulted in execution of ACO on 2/3/11 that calls for connection to United Water by connection to UW-Vernon Valley (1922026). Effective April, 2012, system has tied into United Water Resources and is no longer an independent public water system. NFA	

	2010 STRATEGY LIST HIGH PRIORITY NON-COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
NJ0105323	ST MARYS SCHOOL	Referred to Program by BSDWI. Nitrate MCL violations.	Water Quality issues were addressed. Copper AL exceeded first half 2012. CCTR under review (submitted 5/15/12). pH being monitored by system to optimize treatment. NFA	
NJ0105360	SAINT MARY'S SCHOOL - WELL 2	Referred to CD Program by BSDWI. Lead & Copper ALEs.	Water Quality issues were addressed and RTC 3/6/07; no MCL violations since.	
NJ0108352	DOT FAA ATL BLD 33 & BLD 208	Listed in 2007. Lead ALEs. Monthly coliform MCL violations.	Preliminary TMF capacity evaluation site inspection on 11/10/09. Subsequent follow-up research shows full TMF review unnecessary. Facility received Environmental Stewardship Certification in 8 categories including having an Environmental Management System and water reduction. SDWIS shows no violations since 4Q2007 and RTC in 3Q2008. NFA	
NJ0109302	ESTELL MANOR SCHOOL	Referred to Program by BSDWI. Nitrate MCL violations, Lead & Copper ALEs, Barium MCL, & Sodium >100 ppm.	RTC 09/24/09. Letter detailing repairs to ion exchange unit 06/28/2010; no further nitrate violations in 2011 & 2012. NFA	
NJ0317303	BURLINGTON CTY SPEC SERVICES	Coliform MCLs.	TP001001 now has cation exchange for softening & hardness removal and disinfection with post hypochlorination.	
NJ0436481	DONIO TRUCKING	Referred to Program by BSDWI.	No further violations.	
NJ0603301	CUMBERLAND CNTY TECHNICAL ED	Referred to Program by BSDWI. Nitrates & Radionuclides.	No nitrate MCL violations since 4Q2007. Letter dated 03/06/2013 allows reduced monitoring since no detect for radionuclides. NFA	
NJ0722304	THE MANOR REST	Arsenic MCLs.	CEHA sanitary survey completed Nov 2012 with no violations. BSDWI will monitor the arsenic treatment status. NFA needed under cap dev	
NJ1008300	ALBERT ELIAS RESIDENTIAL GROUP	Listed in 2007. Lead action level exceedance. Acute coliform MCL violation.	TMF capacity site visit - 11/20/09. System installed new well in 4/20/10. Operate permit issued 07/11/13. Reduced lead and copper monitoring as of 02/29/12 NFA .	
NJ1021337	MARINELLIS	Coliform MCL & Nitrate M/R.	No MCL violations since 2008. NFA,	
NJ1025300	STATE OF NJ SPRUCE RUN*	Acute Coliform MCL & M/R violations.	Permit issued after treatment was installed 06/12/2012. Settlement agreement signed, penalties paid and then terminated 01/3/2013. NFA .	

	2010 STRATEGY LIST HIGH PRIORITY NON-COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS SUMMART	
NJ1026301	ESC SCHOOL	Listed in 2007. Lead and copper ALEs. Arsenic MCL violation.	Program efforts involved site visits, follow-up, & coordination to help system obtain permit approvals & install treatment units for radium, arsenic, sodium, pH adjustment, and disinfection. System is fully operational as of 11/1/10 & monitoring shows a return to compliance.	
NJ1026318	MT. AIRY HAPPY TIME SCHOOL	Arsenic & Coliform MCLs.	System return to compliance on 4/26/10. Rec'd acceptable DW Quality Cert 08/08/2011. NFA	
NJ1106328	WASHINGTON XING STATE PARK*	Acute Coliform MCL & M/R violations.	Using new well since 1/1/10 and TP001001 provides UV disinfection. RTC 5/17/10 with new well online, no MCL violations since. Sanitary Survey inspection 03/08/13, no issues. NFA	
NJ1106355	KOOLTRONIC INC	Arsenic & Coliform MCLs with M/R violations.	System RTC 6/09. NFA	
NJ1106389	HOPEWELL VALLEY GC*	Listed in 2007. Arsenic MCL violations.	Conducted TMF capacity evaluation site visit on 5/14/10. System deactivated in September 2010 and old well sealed in 2012. NFA	
NJ1319459	GETTY STATION #00658*	Referred to Program by BSDWI. Repeated Coliform MCLs in 2010. Well head problems.	Only one M/R violation in 3012. NFA	
NJ1332351	MILLSTONE CTR*	Listed in 2007. Acute coliform MCL violations.	Initial TMF site visit conducted 9/25/08 with follow- up visit on 5/25/10. System is initiated required sampling in 1QSFY2011. Turbidity level triggered MPA sampling, but concurrent well repair may have caused spike. Allowed resumption of physical/bacteria testing. NFA .	
NJ1352321	BRIELLE HILLS BLDG #1&2	Referred to Program by BSDWI. Lead & Copper ALEs, M/R violations, and management problems prevent resolution.	Violations resolved. Licensed Operator is Louis Gialanella since 2/1/2012. NFA	
NJ1352322	BRIELLE HILLS CONDO ASSOC BLDG 8,9	Referred to Program by BSDWI. Lead & Copper ALEs, M/R violations, and management problems prevent resolution.	Violations resolved. Licensed Operator is Louis Gialanella since 2/1/2012. NFA	
NJ1352340	BRIELLE HILL CONDO-BLDG 3/4 & 5	Referred to Program by BSDWI. Lead & Copper ALEs, M/R violations, and management problems prevent	Violations resolved. Licensed Operator is Louis Gialanella since 2/1/2012. NFA	

	2010 STRATEGY LIST HIGH PRIORITY NON-COMMUNITY WATER SYSTEMS - STATUS SUMMARY			
PWSID#	PWS NAME	INITIAL REASON LISTED	CURRENT STATUS/PLAN	
		resolution.		
NJ1415301	LOTSA PASTA*	Listed in 2007. Coliform MCL	NOV closed. Particulate filter installed in 2012. Settlement of fines with Enforcement. NFA	
NJ1427400	SANDSHORE INDUSTRIAL CONDO ASSOC	Coliform MCLs.	RTC in 2010, there were some M&R violations, Currently have a LO. NFA	
NJ1436329	PHILLIPS	Acute Coliform MCLs in early 2008	System return to compliance in April 2008. NFA	
NJ1615390	OLD SCHOOL PUB*	Acute & TCR Coliform MCLs. M/R violations.	System return to compliance in 2008. NFA	
NJ1615412	PASSPORT CAFE/GREENW OOD LAKE AIRPT*	Acute & TCR Coliform MCLs.	Return to compliance in December 2009. NFA	
NJ1806329	SAINT GOBAIN PERFORMANC E PLAST	Arsenic MCLs & M/R violations.	Return to compliance in May 2009. NFA	
NJ1806343	SCPC BALLFIELD*	Referred to Program by BSDWI. Treatment problems. Acute Coliform & M/R violations.	Connected to NJAWCo. Deactivated 02/01/2012. NFA	
NJ1924329	FRANKLIN SUSSEX AUTOMALL	Nitrate & Coliform MCLs.	Nitrate RTC in March 2010 and coliform RTC in May 2011. NFA.	

* Transient non-community water system

APPENDIX II

CAPACITY DEVELOPMENT PROGRAM New 2013 STRATEGY LIST

Community Water Systems

PWSID	PWSName	PWS Type	Pop Srvd	Pop Pts	MCL Violations Pts	Inspection Def Pts	M/R Violations Pts	ACO/AO Pts	Total Pts	Note
	NORTH SHORE WATER	0.00	107					-	42	
1904004	ASSOCIATION CLIFFSIDE PARK WATER	CWS	105	3	3	0	0	7	13	Carryover from 2010 List
1438001	ASSOC INC	CWS	80	3	0	0	0	7	10	Carryover from 2010 List
0301001	BUTTONWOOD MOBILE HOME PARK	CWS	77	3	3	0	0	0	6	Carryover from 2010 List
0339001	NEW LISBON DEVELOPMENTAL CENTER	CWS	2014	2	2	0	0	0	4	Carryover from 2010 List
0612001	BAYSHORE MOBILE HOME PARK	CWS	81	3	2	0	0	0	5	Carryover from 2010 List
1013001	HAMPTON BOROUGH	CWS	1650	2	0	0	0	0	2	Carryover from 2010 List
1414009	MOUNTAIN SHORE WATER SUPPLY	CWS	90	3	0	0	0	0	3	Carryover from 2010 List
1521001	OCEAN GATE	CWS	3200	2	0	0	0	0	2	Carryover from 2010 List
1922010	THE VILLAGE OF LAKE GLENWOOD	CWS	130	3	0	0	0	0	3	Carryover from 2010 List
1615001	WEST MILFORD TWP MUA - BIRCH HILL PARK	CWS	180	3	0	3	0	7	13	Added by the CD Program
1615002	WEST MILFORD TWP MUA - GREENBRROK ESTATE	CWS	600	2	0	3	0	0	5	Added by the CD Program
1615006	WEST MILFORD TWP MUA - PARKWAY	CWS	115	3	3	3	0	0	9	Added by the CD Program
1615012	WEST MILFORD TWP MUA - AWOSTING	CWS	633	2	3	3	3	0	11	Added by the CD Program
1615014	WEST MILFORD TWP MUA - CRESCENT PARK	CWS	700	2	0	3	0	0	5	Added by the CD Program
1615016	WEST MILFORD TWP MUA - OLDE MILFORD ESTATE	CWS	1622	2	3	3	6	0	14	Added by the CD Program
1615018	WEST MILFORD TWP MUA - BALD EAGLE VILLAGE	CWS	1258	2	0	3	0	0	5	Added by the CD Program
1347001	LAKE COMO BOROUGH	CWS	1500	2	0	0	0	0	2	Added by the CD Program

1306001	BELMAR BOROUGH	CWS	6700	1	0	0	0	0	1	Added by the CD Program
	AVON BY THE SEA									
1305001	BOROUGH	CWS	2500	2	0	0	0	0	2	Added by the CD Program

Non-Community Water Systems

PWSID	PWSName	PWS Type	Syste m Type Pts	System Classification Pts	MCL Violations Pts	M/R Violations Pts	ACO/AO Pts	Total Pts
100730 8	SARAH DILTS FARM MAIN PAVILON*	TNCWS	1	2	0	0	0	3

* Transient non-community water system

PRIORITY CODES

High Priority	=	$\text{RED} \ge 12$
Medium Priority	=	GREEN = 7 to 11
Low Priority	=	BLUE ≤ 6