

**State of New Jersey
Department of Environmental Protection
Division of Water Supply
Bureau of Loans and Data Management**

Capacity Development Program

**REPORT ON
ONGOING IMPLEMENTATION
OF THE
CAPACITY DEVELOPMENT PROGRAM**

Period of July 1, 2005 to June 30, 2006

August 2006

**Governor
Jon S. Corzine**

**Commissioner
Lisa P. Jackson**

IMPLEMENTATION REPORT

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Introduction

The 1996 Amendments to the Federal Safe Drinking Water Act (SDWA) require 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. This is the New Jersey Department of Environmental Protection's sixth annual report on the ongoing implementation of the Capacity Development Program.

Overview

The 1996 Amendments to the SDWA create a focus on ensuring and enhancing the technical, managerial and financial capacity of public water systems to comply with the National Primary Drinking Water Regulations.

In accordance with Section 1420 (a) of the Federal regulations each state shall have the legal authority to assure that all new community and non-transient non-community water systems demonstrate adequate technical, managerial and financial capacity. In New Jersey, Assembly Bill No. 2615 was signed into law on August 2, 1999 (P.L.1999 Chapter 176). This legislation amended the New Jersey Safe Drinking Water Act (N.J.S.A. 58:12A) to give New Jersey explicit legal authority to require new public water systems to demonstrate capacity. The New Jersey Department of Environmental Protection (Department) proposed new regulations at N.J.A.C. 7:10-13 which establish the requirements to assure that all new public community and non-transient non-community water systems have adequate capacity. Commissioner Robert C. Shinn, Jr., adopted the new regulations on July 31, 2000. The effective date of the Regulations is the date of publication in the New Jersey Register (August 21, 2000). Commissioner Bradley M. Campbell readopted the Regulations without changes on November 4, 2004.

In accordance with Section 1420 (c) of the Federal regulations 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 Capacity Development Strategy on September 28, 2000.

This report will review the activities conducted from July 1, 2005 through June 30, 2006 regarding implementation of the Capacity Development Program.

Approval/Disapproval of New Systems

Community Water Systems

The Department added eight (8) new community water systems to its inventory of public water systems during the period of July 1, 2005 through June 30, 2006. None of the eight (8) systems with start dates occurring during this timeframe received a TMF review as they did not meet the definition of "new system". Meaning that the systems were not newly constructed or did not expand their infrastructure to become a community water system and consequently did not require a TMF review. These systems were existing non-transient and transient water systems that were reclassified in SFY 2006 after careful evaluation of data

available to the Department. In addition, an update on two (2) community water systems where TMF approvals were not made/or start dates not provided in the 2005 Capacity Development Report are provided. The following table lists the community water systems added:

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>START DATE</u>	<u>COMMENTS</u>
1902010*	Life Care Mews	NA	New Construction, permit application approved 5/6/05 TMF approved 01-18-05 System Inactive
1615021*	West Milford (Eagle Ridge)	NA	New Construction, permit incomplete and returned to applicant. TMF evaluation terminated
0301001	Buttonwood Home Mobile Park	9/7/05	Existing infrastructure Reclassified: NT to CWS No TMF required
0516002	Carol Lynn Trailer Resort (Well #2)	7/29/05	Existing infrastructure Reclassified: NT to CWS No TMF required
0516003	Carol Lynn Trailer Resort (Well #3)	7/29/05	Existing infrastructure Reclassified: NT to CWS No TMF required
0516004	Carol Lynn Trailer Resort (Well #4)	7/29/05	Existing infrastructure Reclassified: NT to CWS No TMF required
1330003	Aberdeen-High School Oakshade area	7/12/05	Existing infrastructure Reclassified: NT to CWS No TMF required
1330004	Aberdeen- Freneau	7/13/05	Existing infrastructure Reclassified: NT to CWS No TMF required
1345001	NJ American W Co. Monmouth/Ocean system	4/1/06	Existing infrastructure Reclassified NT to CWS No TMF required
1414023	Abernaki Rail Homeowners Association	7/12/06	Existing infrastructure Reclassified: NT to CWS No TMF required

Key: **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 community water system proposals have been denied approval based on TMF requirements. In addition, all new community water systems that were approved under the Capacity Development Program are presently in good standing and have not appeared as being in significant non-compliance nor demonstrated any other pattern of non-compliance.

Non-Transient Non-Community Water Systems

New Jersey added twenty-two (22) non-transient, non-community water systems to its inventory of public water systems during the period of July 1, 2005 through June 30, 2006. Nine (9) of the twenty-two (22) systems required TMF approval under NJ Safe Drinking Water Act regulations at N.J.A.C. 7:10-13. The remaining thirteen (13) systems did not meet the definition of "new system". Meaning that the systems were not newly constructed or did not expand their infrastructure to become a non-transient non-community water system and consequently did not require a TMF review. These systems were either unregulated existing systems, transient water systems that were reclassified, or a reactivation of an existing system. The following table lists the non-transient, non-community water systems added:

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>START DATE</u>	<u>COMMENTS</u>
0106301	Benchmark Academy Charter HS	6/1/06	Existing infrastructure Reactivated No TMF required
0111306	Lenox China Inc.	3/16/06	Existing infrastructure Reactivated No TMF required
0111452	Galloway Community Charter School	9/1/05	TMF approved on 9/1/05 by DEP.
0613328	Matriark family Center Seabrook House	5/16/06	Under TMF review by DEP. Opened before approval
1022379	Readington Middle School #2	12/7/05	Under TMF review by DEP. Opened before approval
1024317	Tewsbury Elementary School	8/1/05	Under TMF review by DEP. Opened before approval
1101314	V & K Holding	6/14/06	Existing infrastructure Reactivated No TMF required
1106339	Pennington Partnership	6/29/06	Existing infrastructure Reactivated No TMF required

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>START DATE</u>	<u>COMMENTS</u>
1113315	Goddard School	3/31/06	Under TMF review by DEP. Opened before approval
1332373	Hunter Jersey Peter	9/27/05	Existing infrastructure No TMF required
1332374	Forrest Hills Building A	10/27/05	Under TMF review by DEP. Opened before approval
1332378	HYTEK Corp Center	5/4/06	Existing infrastructure No TMF required
1407304	Highlands Building	1/5/06	Existing infrastructure Reactivated No TMF required
1436376	Kiddie Academy of Mt. Olive	12/13/06	Under TMF review by DEP. Opened before approval
1436378	Flanders Professional BLDG	1/5/06	Existing infrastructure Reactivated No TMF required
1710339	Daytop Village	7/19/05	Existing infrastructure Reactivated No TMF required
1710340	The Early Years	11/18/05	Existing infrastructure Reactivated No TMF required
1808361	Tabatchnick Fine Foods	7/22/05	Existing infrastructure Reactivated No TMF required
1910340	Lowes Retail Store	2/2/06	TMF approved 7/12/06 by DEP.
1911348	Hardyston Mun. BLDG	12/5/05	Under TMF review by DEP.
1918350	Laddey, Clark, & Ryan	11/29/05	Existing infrastructure Reactivated No TMF required
2116303	NYK Logistics	12/14/05	Existing infrastructure Reactivated No TMF required

Key: **CWS** — community water system, **NT** — non-transient non-community water system,
T — transient non-community water system, **TMF** — technical, managerial, financial evaluation

To date, no new non-transient non-community water system proposals have been denied approval based on TMF requirements. In addition, all new non-transient non-community water systems that were approved under the Capacity Development Program are presently in good standing and have not appeared as being in significant non-compliance nor demonstrated any other pattern of non-compliance.

Work Plan Activities

The Capacity Development Program FY 2006 Workplan was submitted to EPA on April 1, 2005. During the period of July 1, 2005 through June 30, 2006, the Program engaged in several activities related to implementation. The following is a review of New Jersey's projected and accomplished tasks for the 2006 fiscal year:

1. Prepare a report on the efficacy of the capacity development strategy and the progress made towards improving the technical, managerial, and financial capacity of public water systems in the State.

A report on the efficacy of the capacity development strategy and the progress made towards improving the technical, managerial, and financial capacity of public water systems in the State was submitted to the Governor of the State of New Jersey and the USEPA – Region II on September 21, 2005. This report was also made available to the public via the Division's website.

2. Prepare an updated Strategy List of public water systems requiring capacity development. This list is prepared as needed and identifies the number of TMF evaluations to be performed.

Due to the Division of Water Supply's reorganization, the 2006 Strategy List has not been developed. It is anticipated that this list will be developed by June 2007. The Capacity Development Program continues to utilize the Strategy List developed during February 2004.

In addition, the preparation of the 2006 Strategy List is delayed until the Division completes the conversion of data to SDWIS/STATE. Compliance determinations using SDWIS-State is current and complete for all maximum contaminant level violations and monitoring and reporting violations for total coliform, nitrate, inorganics, volatile organic compounds, and lead/copper. The Department anticipates that monitoring and reporting violations for radionuclides, synthetic organic compounds and disinfection byproducts, will be completed by the end of calendar year 2006.

The 2004 Strategy List will be used to prioritize the Program's resources for performing capacity evaluations and providing technical, managerial, and financial assistance. Of the 609 community water systems reviewed, 6 systems were ranked as "High" priority, 39 were ranked as "Medium" priority, and 129 were ranked as "Low" priority. Of the 3,551

non-community water systems reviewed, 11 systems were ranked as "High" priority, 170 were ranked as "Medium" priority, and 272 were ranked as "Low" priority.

3. Perform evaluations and provide technical assistance to promote capacity development to those water systems that fail to demonstrate adequate technical, managerial, and financial capacity.

Due to the reorganization of the Division of Water Supply, the implementation of the contract has been put on hold and will continue next SFY2007. New Jersey Water Association, under Contract, will perform technical and managerial evaluations. The Bureau will continue to perform financial evaluations. Technical Assistance is provided to public water systems ranked "high" on the Strategy List. Representatives of the Capacity Development Program or the New Jersey Water Association offer assistance in implementing system specific Improvement Plans. Systems ranked "Medium" or "Low" typically receive assistance through the Department's Small Water System Technical Assistance Program. The status of systems ranked "High" on the Strategy Lists of 2001 and 2004 are provided as Appendices I & II, respectively.

4. Provide contract management and coordination for the executed Contract for Service with the New Jersey Water Association. The contract is for implementation of activities under the Capacity Development Program, specifically to perform on-site capacity evaluations and provide technical assistance to promote technical, managerial, and financial capacity.

To assist in the implementation of the Capacity Development Program activities, a contract for service between the New Jersey Department of Environmental Protection and the New Jersey Water Association was executed on March 5, 2004. Part 2 of the Contract pertains to Capacity Development Evaluations, Technical Assistance and Engineering Services. The duration of the contract was for a period of twenty-four months, initiating from the date of execution. The maximum monetary obligation for the completion of services associated with the Capacity Development Program is \$100,000.00. To date, the Program has dispersed \$4,893.00 dollars for services rendered under the executed contract. Additional claims for services rendered are ongoing. Due to the Division of Water Supply's reorganization, the implementation of the contract was put on hold and the contract has been extended till February 2008. The Division intends to reactivate this contract in SFY2007.

5. Prepare and issue monitoring schedules for all community water systems and non-transient, non-community water systems.

Monitoring schedules were issued for Calendar Year 2006 to all community water systems and non-transient, non-community water systems in March 2006. There were approximately 1,500 schedules issued to community (approximately 610 systems) and non-transient non-community water systems (approximately 890 systems). Monitoring schedules for transient, non-community water systems were discontinued beginning Calendar Year 2005.

6. Prepare an annual report that documents the ongoing implementation of the capacity development program. This report must be submitted to EPA Region II within 45 days of the end of the reporting period (by August 15, 2006).

This prepared Report addresses the ongoing implementation reporting requirements of capacity determinations for new systems and the application of the approved strategy for existing public water systems.

7. Process Technical, Managerial and Financial Capacity for new water systems.

The Department added eight (8) new community water systems during the period of July 1, 2005 through June 30, 2006. All eight (8) systems did not require a Technical, Managerial and Financial review since they all did not meet the definition of a "New System." These systems were existing non-transient water systems that were reclassified to community water systems.

New Jersey added twenty-two (22) non-transient, non-community water systems during the period of July 1, 2005 through June 30, 2006. There were nine (9) systems that required Technical, Managerial and Financial approval under the NJ SDWA 7:10-13. The remaining thirteen (13) systems did not require a Technical, Managerial and Financial review since they all did not meet the definition of a "New System." These systems were either unregulated existing systems, transient water systems that were reclassified, or a reactivation of an existing system. Out of the nine (9) systems, two (2) were approved and seven are still under review by the Department.

8. Expand/append existing contract services with County Environmental Health Act (CEHA) agencies to provide additional monetary compensation for TMF Reviews.

This workplan activity is unresolved. Due to the Division of Water Supply's reorganization, the Division will continue to work on this item in SFY2007.

Reporting Criteria

In this Section of the Report, the Department has considered and responded to the Memorandum from Cynthia C. Dougherty, Director, Office of Ground Water And Drinking Water, USEPA-HQ 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 (NJAC 7:10-13) pertaining to the requirements of technical, managerial, and financial (TMF) capacity for new community and non-transient non-community water systems was effective on August 21, 2000. Commissioner Bradley M. Campbell readopted the Regulations without changes on November 4, 2004.

- **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.**

As reported in August 2005, the Department has made one modification to the State's control points. In the past the Program would not issue a State public water system identification number (PWSID#) to any new system until the requirements of subchapter 13 were satisfactorily addressed. However, in some recent instances, the Department has had to issue a PWSID# to new systems (only non-transient water systems) which are in operation but have yet to satisfy the TMF requirements. This change has allowed the Department to provide monitoring guidance to those water systems which have inadvertently commenced operation without TMF approval and in turn to receive and process monitoring data for compliance evaluation purposes during the TMF review. Typically, the Department assigns a PWSID# and 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. Since August 2005 no other modifications have been made.

- **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 lists.**

The Department has recently reviewed the status of all new systems (community and non-transient water systems) which received TMF approval in the past three years. Based upon this review, all new systems are presently in good standing and have not appeared as being in significant non-compliance nor demonstrated any other pattern of non-compliance.

- **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 observation to the successful implementation of the efforts and mechanisms under the Capacity Development Program and the coordination of initiatives under the Enforcement Program, Small Water System Technical Assistance Program, and Operator Certification Program. The Capacity Development Program is making progress in addressing non-compliance 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 2005 and include:

- Zero Tolerance Policy
- Operator Certification Program (extended to NTNC water systems)
- Monitoring Schedules
- Technical Assistance

- Contracted Services
 - By the NJDEP
 - 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
- **How has the State continued to identify systems in need of capacity development assistance?**

The Department identifies systems in need of capacity development by preparing "Strategy Lists" which indicate those public water systems most in need of capacity development and which enables the Department to prioritize the Program's resources for performing 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. Due to the Division's reorganization, the 2006 Strategy List has not been developed. It is anticipated that this list will be developed by June 2007. The 2006 Strategy List will be prepared from a review of the compliance status during the period of July 2004 through December 2005.

In preparation of the Strategy List, water systems are evaluated based upon the following criteria: population served, type of water system, significant non-compliance status, maximum contaminant level (MCL) violations, monitoring and reporting (M&R) violations, formal enforcement actions, and infrastructure deficiencies. Applying the listed criteria, systems are ranked as low, medium, or high. Systems ranked "high" are recognized as not having adequate capacity and consequently require capacity development.

The 2001 Strategy List indicated that of the 606 public community water systems reviewed, 15 systems were ranked as "High" priority, 53 were ranked as "Medium" priority, and 135 were ranked as "Low" priority. Of the 3,617 non-community water systems, 19 systems were ranked as "High" priority, 229 were ranked as "Medium" priority, and 330 were ranked as "Low" priority.

The 2004 Strategy List indicated that of the 609 community water systems reviewed, 6 systems were ranked as "High" priority, 39 were ranked as "Medium" priority, and 129 were ranked as "Low" priority. Of the 3,551 non-community water systems reviewed, 11 systems were ranked as "High" priority, 170 were ranked as "Medium" priority, and 272 were ranked as "Low" priority.

- **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 Department has identified training needs for small water system owners and operators. By contract with the New Jersey Water Association, 15 training sessions were held in the past year to provide assistance to small water systems (those serving less than 10,000). Seventy-five (75) small systems were represented at these sessions. In addition, a contract with Rutgers University provides for a 25% tuition subsidy for drinking water-related training courses. In the past year, 36 training courses were held. Three hundred-ninety (390) operators attended at the reduced rate.

Monitoring schedules were issued for Calendar Year 2006 to all community water systems and non-transient, non-community water systems in March 2006. There were approximately 1,500 schedules issued to community (approximately 610 systems) and non-transient non-community water systems (approximately 890 systems). These schedules benefit the Capacity Development program in that it notifies the water systems what to monitor for and thus assists the systems in compliance. This benefits the community water systems as well as the non-transient non-community water systems.

- **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.**

As of August 2005, the Capacity Development Program was reviewed to identify means of improving the process of performing a technical, managerial, and financial evaluation. The Program's technical and managerial evaluation process was deemed acceptable at that time. However, some considerations for improving the financial aspects are:

1. Provide additional training to system owners/operators on asset management, operating a water system, and other managerial and financial training courses;
2. Establish services with certified public accountants to conduct financial evaluations and develop water system budgets and financial plans;
3. Establish services with appropriate entities to perform asset evaluations at water systems and develop an ongoing asset management plan.

Since August 2005, no progress has been made to the above considerations. The Department, however, intends to look into these considerations in the future.

- **Did the State make any modifications to the existing system strategy?**

As reported in August 2005, the Department made one program modification to the existing system capacity development strategy that pertains to the preparation of the Strategy List. The Department's "Capacity Development Strategy", approved September 2000 by the USEPA established that Strategy Lists would be prepared annually. Following the preparation of the 2001 Strategy List (December 2001) and the 2004 Strategy List (February 2004) it was deemed more practical (from a Program implementation viewpoint) to modify the activity of preparing the Strategy List from annual to once every other year. This adaptation in preparing the Strategy List allows efforts regarding the TMF evaluation and improvement process to be implemented and provides for a more accurate identification of existing systems requiring capacity development without large-

scale duplication. This modification will favorably affect the implementation of the Program by focusing efforts on TMF evaluations and technical assistance. Since August 2005, no other program modifications have been made.

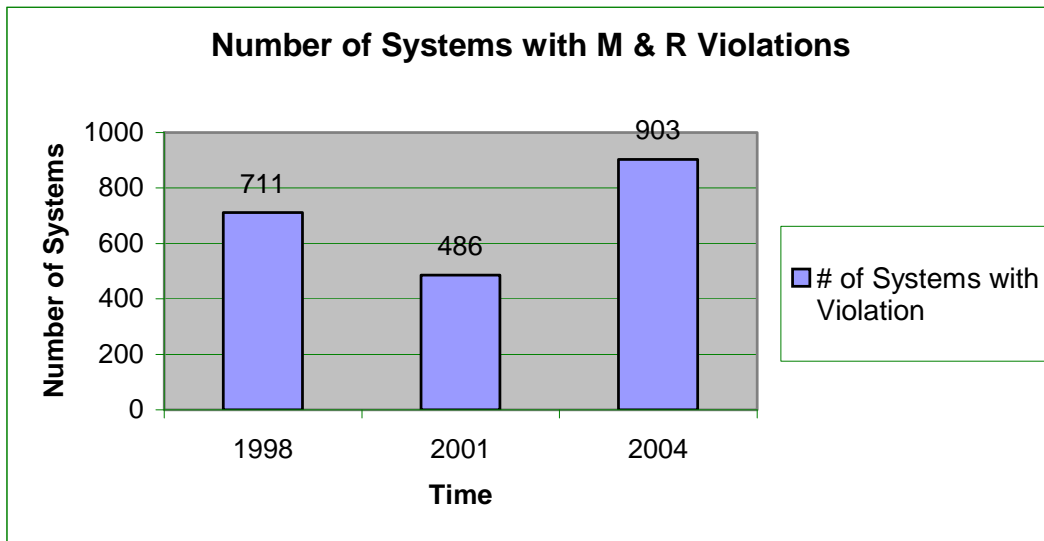
Amendment to 2005 Governor's Report

This section addresses the monitoring and reporting violations for parameter groups, such as inorganics and volatile organic compounds. The violations for these parameters were not available at the time the 2005 Governor's Report was due hence it is being addressed in the 2006 Annual Capacity Development Report.

The number of public water systems with monitoring and reporting violations in 1998 was 711, compared to 486 in 2001, compared to 903 in 2004.

Even though the trend did not go down from 1998 to 2004, the capacity development program is working because the Division is capturing more information and notifying the systems of an M&R violation in a faster timeframe due to the conversion to SDWIS/STATE. Sending out monitoring schedules will help the systems be more aware of their monitoring requirements.

The following chart illustrates the number of public water systems with monitoring and reporting violations recorded for calendar years 1998, 2001, and 2004:



Note: The number of violations depicted for calendar years 1998, 2001, and 2004 represents valid monitoring and reporting violations for Volatile Organic Compounds and Inorganics. Monitoring and reporting compliance data for Synthetic Organic Compounds and Radionuclides for 2004 was not available at this time due to the NJDEP's ongoing conversion of its data management system to the new federal Safe Drinking Water Information System (SDWIS). Consequently, only violations for Volatile Organic Compounds and Inorganics were included in this amendment.

APPENDIX I

CAPACITY DEVELOPMENT PROGRAM STRATEGY LIST 2001 - SUMMARY STATUS

Community Water Systems

Fifteen (15) community water systems ranked "high" on the 2001 Strategy List. Of those, ten (10) systems subsequently acquired TMF capacity and achieved full compliance, and five (5) have not achieved full compliance and are receiving ongoing assistance.

To date, ten (10) of the fifteen (15) community water systems that ranked "high" on the 2001 Strategy List, or 66%, have achieved full compliance with the Safe Drinking Water Act regulations.

Non-Community Water Systems

Nineteen (19) non-community water systems ranked "high" on the 2001 Strategy List. Of those, six (6) systems were deactivated due to connecting to community water systems and discontinuing use of their water supply, or due to a reclassification as a non-public water system and no longer being subject to the Safe Drinking Water Act regulations. Eight (8) systems were returned to compliance as a result of the violation validation process and/or the submittal of monitoring results. Three (3) systems required a full TMF evaluation and subsequently acquired TMF capacity and achieved compliance. Two (2) systems did not participate in the Capacity Development Program. One of the two systems was referred to the Camden County Health Department for enforcement actions and subsequently returned to compliance; the other system was referred to the Northern Bureau of Enforcement for enforcement actions and has not yet achieved compliance.

To date, eighteen (18) of the nineteen (19) non-community water systems that ranked "high" on the 2001 Strategy List, or 95%, are in full compliance with the Safe Drinking Water Act rules and regulations.

Observation

The summary status for the 2001 Strategy List demonstrates that the Capacity Development Program has proven to be an effective tool in assisting public water systems in achieving compliance with the Safe Drinking Water Act regulations. The Capacity Development Program clearly serves as an additional resource for water systems to utilize to receive the one-on-one attention and involved assistance not afforded by other NJDEP programs.

Status of Community Systems Ranked High on the 2001 Strategy List

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
0251001	Ridgewood Water Dept.	TMF evaluation completed, report issued 7-14-04. Full compliance <u>not</u> achieved. NJWA providing ongoing assistance regarding TMF capacity improvements. <i>Remains out of compliance.</i>
0329006	Wagon Wheel Estates	TMF evaluation completed report issued 4-11-04. TMF capacity acquired. <i>Compliance achieved.</i>
0326014	Lee Mobile Homes	TMF evaluation completed, report issued 10-22-03. New Owner 7/04, assistance visit 8/4/04. Full compliance <u>not</u> achieved. NJWA providing ongoing assistance regarding TMF capacity improvements. <i>Remains out of compliance.</i>
1019001	Bunnvale W.S.	TMF support document prepared. System acquired by Aqua NJ - 4/02. Historical violations resolved. <i>Compliance achieved.</i> NJWA providing ongoing assistance for technical capacity (infrastructure improvements).
1019003	Camelot Spruce Ridge	Data verification process, violations resolved and/or incorrect. <i>Compliance achieved.</i>
1406002	Windy Acres MHP	TMF support document prepared. <i>Compliance achieved.</i> NJWA providing ongoing assistance for technical capacity (storage waiver & operator reports).
1414008	Oak Ridge MHP	TMF support document prepared. Full compliance <u>not</u> achieved (major issue - disinfection w/o permit). NJWA providing ongoing assistance for technical capacity (disinfection permit & operator reports). <i>Compliance achieved before 2004.</i>
1414013	Sun Valley Park	TMF support document prepared. Full compliance <u>not</u> achieved. (major issue – new well w/o permit) NJWA providing ongoing assistance for technical capacity (well permit, O&M Manual, storage waiver, well abandonment, reporting forms). <i>Moved to LOW priority by 2004.</i>

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
1427010	NJ Vasa Homes	Data verification process, violations resolved and/or incorrect. Compliance achieved.
1511006	Shady Lake MHP	TMF evaluation completed, report issued 12-17-04. Compliance achieved. Impending connection to adjacent PWS.
15110011	Luxury MHP	Change in ownership TMF evaluation report re-issued 5-14-04 Full compliance <u>not</u> achieved. NJWA providing ongoing assistance regarding TMF improvements. Remains out of compliance.
1511017	Jackson Colonial Arms	TMF evaluation completed, report issued 11-17-03. TMF capacity acquired. Compliance achieved.
1611002	Ringwood Water Dept.	Data verification process: violations resolved and/or incorrect. Compliance achieved.
1922013	United Water DC System	System acquired by United Water 12/03. TMF issues resolved. Compliance achieved. Infrastructure upgrades being monitored by Northern Enforcement.
1922015	Walnut Hills W. Co.	System acquired by United Water 8/03. Full compliance not achieved. Infrastructure upgrades being monitored by Northern Enforcement. System referred to NJWA for evaluation and technical assistance. Moved to 2004 Strategy List.

KEY:

XXXX

XXXX

NJWA

green denotes systems in full compliance
yellow denotes systems not in full compliance
NJWA New Jersey Water Association

Status of Non-Community Systems Ranked High on the 2001 Strategy List

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
0215304	Yeshiva Ohr Hatalmud	System inactive as of September 2000, connected to CWS.
0320354	Kindercare	TMF evaluation completed, report issued 10/22/02. TMF issues resolved. <i>Compliance achieved.</i>
0435374	Town Tavern	System did not participate in Cap Dev Program. Historical violations referred to Camden County HD for enforcement actions. <i>System returned to compliance 2/04.</i>
0601302	Bridgeton School	System inactive as of May 2001, connected to CWS.
0722301	Montclair Golf Course	Data verification process: violations resolved and/or incorrect. <i>Compliance achieved.</i>
1002300	Hoppack School	Data verification process: violations resolved and/or incorrect. <i>Compliance achieved.</i> Technical assistance provided through Small Water Technical Assistance Program.
1006363	His Loving Arms	TMF evaluation completed, report issued 10/21/03. TMF issues resolved. <i>Compliance achieved.</i>
1021315	Center for Educ. Adv.	System inactive as of January 2003, connected to CWS.
1021424	Copper Hill School	TMF evaluation completed, report issued 11/6/02. TMF issues resolved. <i>Compliance achieved.</i>
1021426	Congreg. Bet-Tikva	System inactive as of December 2002, reclassified as a non-public water system.
1021427	Little-Angels School	Data verification process: violations resolved and/or incorrect. Reclassified from NT to T. <i>Compliance achieved.</i>
1022305	Darts Mill Day Care	Data verification process: violations resolved and/or incorrect. <i>Compliance achieved.</i>
1026300	West Amwell School	Data verification process: violations resolved and/or incorrect. <i>Compliance achieved.</i>

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
1106379	All Bright Day School	System inactive as of September 2003, connected to CWS.
1113308	Princeton Arms Stores	Data verification process: violations resolved and/or incorrect. Compliance achieved.
1332355	Kindercare	Data verification process: violations resolved and/or incorrect. Compliance achieved.
1414326	JP Italian Restaurant	Data verification process: violations resolved and/or incorrect. Compliance achieved.
1427364	Environ. Development	System inactive as of 7/01, reclassified as a non-public water system.
1436306	Kingston Motel	System did not participate in Cap Dev Program. Violations referred to Northern Enforcement for enforcement actions. System has not returned to compliance.

KEY:	XXX	blue denotes inactive system
	XXX	green denotes compliance achieved
	XXX	red denotes compliance not achieved
	CWS	Community Water System
	NT	Non-Transient Water System
	T	Transient Water System
	NJWA	New Jersey Water Association

APPENDIX II

CAPACITY DEVELOPMENT PROGRAM STRATEGY LIST 2004 - SUMMARY STATUS

Community Water Systems

Six (6) community water systems ranked "high" on the 2004 Strategy List. Of those, four (4) systems are carryovers (reoccurring) from the 2001 Strategy List, one (1) of which has since acquired TMF capacity and achieved full compliance and three (3) of which have not achieved full compliance and continue to receive ongoing assistance. There are two (2) systems on the 2004 Strategy List, one of which is undergoing acquisition under the NJ Small Water System Takeover Act and the other which is under contract to connect to another community water system. TMF evaluations of these two systems are pending the status of their takeover/acquisition.

Eleven (11) non-community water systems ranked "high" on the 2004 Strategy List. Of those, one (1) system intends to connect to a community water system as a result of offsite contamination impacts on their source water quality. Three (3) systems addressed historical violations, returned to compliance, and have maintained compliance to date. The remaining seven (7) systems have TMF evaluations and/or technical assistance to be provided under contract with the NJ Water Association.

Status of Community Systems Ranked High on the 2004 Strategy List

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
0251001	Ridgewood Water Dept.	Ongoing from 2001 Strategy List. TMF evaluation completed, report issued 7-14-04. Full compliance <u>not</u> achieved. NJWA providing ongoing assistance regarding TMF capacity improvements. <i>Still out of compliance.</i>
0326014	Lee Mobile Homes	Ongoing from 2001 Strategy List TMF evaluation completed, report issued 10-22-03. New Owner 7/04, assistance visit 8/4/04. <i>Full compliance not achieved.</i> NJWA providing ongoing assistance regarding TMF capacity improvements. <i>Still out of compliance.</i>
0613001	Seabrook Water Dept.	System undergoing takeover in accordance with the Small Water System Takeover Act. TMF evaluation & improvement process pending. <i>Still active and under 07-26-06 Administrative Consent Order.</i>
1019001	Bunnvale W.S.	Ongoing from 2001 Strategy List. TMF support document prepared. System acquired by Aqua NJ - 4/02. Historical violations resolved. <i>Compliance achieved.</i> NJWA providing ongoing assistance for technical capacity (infrastructure improvements).
1922015	Walnut Hills W. Co.	Ongoing from 2001 Strategy List. System acquired by United Water 8/03. Full compliance not achieved. Infrastructure upgrades being monitored by Northern Enforcement. System referred to NJWA for evaluation and technical assistance. <i>Taken over by UW-Vernon Hills (1922015). Treatment installed but well is not permitted.</i>

1922028

Valley View Apartments

Pending connection and contract for service with United Water – Vernon Hills.
TMF evaluation & improvement process on hold.
Still active, has no Licensed Operator and not yet hooked to UW-Vernon Hills (1922015).

KEY:

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XXXX

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TMF

NJWA

green denotes systems in full compliance

yellow denotes systems not in full compliance

blue denotes systems with pending evaluations

technical, managerial, financial

New Jersey Water Association

Status of Non-Community Systems Ranked High on the 2004 Strategy List

<u>PWSID No.</u>	<u>SYSTEM NAME</u>	<u>COMMENTS</u>
0435327	Interprod	Pending connection (Dec. 05) to the Township of Waterford Water Dept. TMF evaluation & improvement process on hold. <i>Still active and not yet hooked up to Waterford Water Dept.</i>
0612300	Stow Creek Elem School	Data Verification process completed. Violations resolved. Compliance achieved. <i>NEW problem as of 2006 — exceedance for gross alpha.</i>
1106394	Toddler Village Stony Brook	Data Verification process completed. Full compliance not achieved. Ongoing assistance provided. <i>Monitoring problem for Pb/Cu, sampling conducted in wrong quarter but no AL exceeded.</i>
1202315	American Cabinetry	TMF evaluation & improvement process pending.
1213321	Kestlers	TMF evaluation ongoing. <i>Status changed to Community Water System.</i>
1415301	Lotsa Pasta	TMF evaluation & improvement process pending.
1511416	Jackson Municipal Complex	TMF evaluation & improvement process pending. <i>Full compliance achieved.</i>
1615324	Maple Road School	Data Verification process completed. Full compliance not achieved. Ongoing assistance provided. <i>Pb/Cu problems.</i>
1615327	Westbrook School	Data Verification process completed. Full compliance not achieved. Ongoing assistance provided. <i>Pb/Cu problems.</i>
1922304	Days Inn	TMF evaluation & improvement process pending.

1922382

Discovery Years-Day Care

Data Verification process completed.
Violations resolved. Compliance achieved.
***NEW problems as of 2006 —Pb/Cu M/R
problems in 2005.***

KEY:

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TMF

green denotes systems in full compliance
yellow denotes systems not in full compliance
blue denotes systems with pending/ongoing evaluations
technical, managerial, financial