

Level 1 & Level 2 Assessments and Corrective Actions

WHO DOES THIS FACTSHEET APPLY TO?

PUBLIC WATER SYSTEMS (PWSs) that must conduct a Level 1 or Level 2 assessment.

RTCR

What to know?

- What is an Assessment?
- What to do if you are triggered to conduct an assessment.
- Regulator may be a state or county employee.



Consult with your REGULATOR and Technical Assistance Providers to discuss progress.

FOR ASSISTANCE, PLEASE CONTACT:

BUREAU OF SAFE DRINKING WATER
775-687-9521

[HTTP://NDEP.NV.GOV/BSDW](http://NDEP.NV.GOV/BSDW)

ATTENTION!

Your regulator may be Bureau of Safe Drinking Water, Washoe County Health District or Clark County Health District.

WHAT IS AN ASSESSMENT?

When sampling results show that your Public Water System (PWS) may be vulnerable to contamination, PWSs must perform an assessment (Level 1 or Level 2) and **FIND AND FIX ANY "SANITARY DEFECTS."** A sanitary defect can provide a pathway of entry for microbial contamination into the distribution system or indicate imminent failure in an existing barrier (e.g. cracked tank, rat droppings on wellheads, or broken seals).

THERE ARE 5 BASIC ELEMENTS TO INVESTIGATE DURING AN ASSESSMENT:

- Atypical events that may affect water quality or indicate that water quality in the distribution system was impaired;
- Changes in distribution system maintenance and operation, including water storage;
- Water source and treatment methods that affect distributed water quality;
- Inadequacies in sample sites, sampling protocol and sample handling; and
- Existing water quality monitoring data.

A LEVEL 2 ASSESSMENT IS A MORE COMPREHENSIVE AND IN-DEPTH EXAMINATION COMPARED TO A LEVEL 1 ASSESSMENT because the cause of the Level 2 assessment is more critical and likely to result in a direct public health impact.

- A Level 2 assessment must be conducted by the state or county regulatory authority. A Level 1 assessment is typically conducted by the PWS.
- You have 30 days after learning that you triggered an assessment to complete it and correct sanitary defects that were found. You must submit the State-approved form and correction information to your regulator within the same 30-day period. For sanitary defects found but NOT fixed within the 30 days, you must obtain a state-approved schedule for all incomplete corrective actions.

Examples of Common Causes of Contamination	Example Common Corrective Action(s)
Loss of system pressure	<ul style="list-style-type: none"> ✓ Maintenance of adequate pressure ✓ Valve maintenance ✓ Addition or upgrade of on-line monitoring & control
Cross connections	<ul style="list-style-type: none"> ✓ Maintenance of adequate pressure ✓ Installation of backflow prevention assembly/device ✓ Implementation/upgrade of cross connection control program
Cracks in well seal, casing, etc.	<ul style="list-style-type: none"> ✓ Replacement/repair of well components

WHAT TO DO IF YOU TRIGGERED AN ASSESSMENT?

WITHIN 30 DAYS OF LEARNING THAT YOUR PWS TRIGGERED AN ASSESSMENT, a completed assessment form must be submitted to your regulatory authority. The process for completing and submitting the required form depends on the type of assessment. In both cases, your regulator will review the completed form and corrective actions taken to determine if the likely cause of the trigger has been identified and corrected.

Level 1 Assessment

You have to do a Level 1 Assessment if you:

1. Have two or more TC+ samples (use routine and repeat results in your calculation) in one month.



or

2. Fail to collect and analyze at least 3 repeat samples for each routine TC+.

Your system conducts the assessment.

STEP 1: Call your regulator to notify them of the Level 1 Assessment trigger. You may ask the state for assistance with the Assessment.

STEP 2: The Level 1 assessment form can be found at <http://ndep.nv.gov/bsdw/forms.htm>. Perform the assessment.

STEP 3: If sanitary defects are found, fix them, or propose and gain a state-approved schedule for completing the repairs if the sanitary defects cannot be corrected within 30 days of triggering the assessment.

- The PWS and regulator may consult with each other to discuss progress or the corrective action(s) identified at any time during the process.

STEP 5: Submit the completed assessment form with corrective actions taken within 30 days of the assessment trigger.

NOTES—Your PWS will get a treatment technique violation if you:

- Fail to perform an assessment or take corrective action; or,
- Fail to submit the completed assessment form to the state within the 30-day timeframe.

You are required to provide Tier 2 public notice within 30 days in response to a treatment technique violation.

Level 2 Assessment

You have to do a Level 2 Assessment if you have either:

1. *E. coli* MCL violation:

Routine	Repeat
TC+ & EC-	<i>E. coli</i> -positive (EC+)
TC+ & EC+	TC+
TC+ & EC-	TC+ but not analyzed for EC
TC+ & EC+	One or more samples is missing

2. Two Level 1 triggers in a rolling 12-month period.

Your state or county regulator conducts the assessment.

STEP 1: Consult with your regulator to inform them of the Level 2 Assessment trigger and schedule the assessment.

STEP 2: Take pre-assessment steps as recommended by your regulator and plan to be available to assist during the Assessment process.

STEP 3: Have the assessment performed.

STEP 4: If sanitary defect(s) are found, fix them or propose and gain an official schedule for fixing, if the sanitary defect(s) cannot be corrected within 30 days of triggering the assessment.

- A list of required Corrective Actions will be given to the system manager or operator. The corrections must be noted on that form, with the date of completion.
- The PWS and regulators may at any time consult with each other to discuss progress or the corrective actions identified.

STEP 5: Submit the completed Corrective Action form to the state within the 30-day assessment timeframe.