



SANITARY SURVEY FACT SHEET FOR PUBLIC WATER SYSTEMS

Sanitary survey inspections of public water supply systems are required by the Administrative Rules of Montana (ARM) under section 17.38.231. The surveys are completed on-site by DEQ, or a DEQ representative. As the system owner or operator, your role in the survey is to provide any necessary water system information and assistance to the surveyor.

What is the purpose of the survey?

The purpose of a sanitary survey is to protect public health by ensuring your water system is able to consistently and reliably deliver an adequate quality and quantity of safe drinking water to the consumer and to maintain compliance with all regulations.

To achieve this, the surveyor will evaluate the 8 key elements of a water system.

In addition, technical assistance can be provided during the survey visit. This can be an opportunity to clarify proper monitoring and sampling requirements or procedures and inform you of any upcoming changes in regulations.

Completion of these surveys meets both a state and federal requirement.

How often are the surveys conducted?

- Community Water Systems
 - At least every 3 years
- Non-transient Non-Community Water Systems
 - At least every 5 years
- Transient Non-Community Water Systems
 - At least every 5 years

How do I prepare for the survey?

Prior to the survey, you will be contacted by the surveyor (either DEQ or a DEQ representative) to arrange a time and date for the inspection. You should:

- **Set aside time for the surveyor.** Plan on having someone knowledgeable of the water system take the surveyor through the system and the files. It is possible that one person will be more qualified to walk the surveyor through the physical system and someone else will have more knowledge of the monitoring, compliance and data aspects.
- **Be prepared to access all parts of the system.** This includes accessing each source, all tanks (including opening their hatches), all treatment facilities, and any pump stations and pressure reducing stations. Make sure you have keys available to all locked facilities, including gated areas, and ladder extensions and safety equipment if needed to access tanks.
- **Have records on hand.** This includes well logs, monitoring records, TCR monitoring plan, Stage 1 or Stage 2 monitoring plan (if applicable), past sanitary survey reports, and as-built drawings.
- **Have questions prepared for the surveyor.** This is an excellent opportunity to address any questions you may have regarding monitoring, reporting results, compliance, public notification requirements, etc.

Eight key elements of a sanitary survey:

- *Source*
- *Treatment*
- *Distribution system*
- *Finished water storage*
- *Pumps, pump facilities, and controls*
- *Monitoring, reporting, and data verification*
- *System management and operation*
- *Operator compliance with state requirements*

What should I expect during the survey?

Opening Interview

Items to be discussed may include:

- Basic information about the water system such as the condition of system components, compliance with monitoring requirements, management and operation practices, certification of operator(s), etc.
- Deficiencies identified in previous sanitary surveys, corrective actions taken, and the effectiveness of the actions.
- Any violations or compliance problems since the last survey.
- Review of documents such as as-builts, monitoring plans, well logs, etc.
- Update of contact information and inventory changes

Facility Walk-Through

The water system representative and the surveyor will inspect the entire system from source to distribution, typically following the flow of water. The “walk-through” will include:

- A physical inspection of all the visible system components.
- Photographing system components to document observations for the written report.
- Asking questions of appropriate personnel about the system operations, etc.
- Ensuring operator logbooks are current.
- Measuring disinfection concentrations.
- Collecting a water sample if necessary.

Closing Interview

This interview includes:

- Review of all inspection findings with emphasis on significant deficiencies identified during the inspection.
- Review of the requirements for addressing significant deficiencies including timeline, confirmation of corrections, and potential violations if corrections are not made.
- An opportunity for the system to discuss any additional concerns they would like to have included in the sanitary survey report.
- Answering any remaining questions from water system personnel.

What can I expect after the survey?

After completion of the survey, the site visitor will write a report and provide you with a copy. The county sanitarian's offices will also receive a copy. State regulations require that you keep these reports on file for no less than 10 years.

The report you receive can be a valuable tool, as it will discuss the condition of the water system and note any deficiencies that were identified.

Deficiencies will be categorized as either “significant” or “other.”

Significant Deficiency

Any system defect or failure that the state determines to be causing, or have potential for causing, the introduction of contamination into the water delivered to consumers.

In order to protect public health, significant deficiencies require corrective action.

Other Deficiencies

Deficiencies that should be corrected to ensure water of adequate quality and quantity is provided.

Correcting significant deficiencies

Water system deficiencies that are critical enough to warrant designation as “significant deficiencies” must be remedied within required timeframes. The remedy may include immediate corrective action, or may require a DEQ-approved compliance schedule – depending on the nature of the problem.

Failure to correct significant deficiencies is an enforceable violation.

In some cases, special notice to the public of the significant deficiency is required.

Any changes to the system including construction, alteration, or extensions must meet engineering plan and specification review requirements *before* they occur. Contact the Engineering Services Section of the Public Water Supply Program at 444-4400 for more information on these plan and specification requirements.

How can I tell if the surveyor is legitimate?

Sanitary surveys in Montana will be conducted by DEQ personnel, county sanitarians, or contractors performing the inspections on behalf of DEQ. In all cases, the surveyor should have an identification card or other credentials readily available for you to inspect. In some cases the credentials may be a letter from DEQ. You may contact DEQ at (406) 444-4400 to confirm whether a person is authorized to perform the sanitary survey.