

Safe Drinking Water:

A Colorado Guide for Public Water Systems That Use Purchased Water



Colorado Public Water Systems <i>(serve 25 or more persons for 60 or more days per year)</i>					
Community Systems (serve residential populations)		Non-Community Systems (consumers, NOT residents)			
		Non-Transient (same non-resident users daily)		Transient (different users daily)	
Surface Water Source	Ground Water Source	Surface Water Source	Ground Water Source	Surface Water Source	Ground Water Source
Purchased Water Source					

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of Public Health
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Introduction

Colorado Primary Drinking Water Regulations (CPDWR) classify water systems into six basic categories, based upon the source of supply and the population served. The population served may be community, transient non-community, or non-transient non-community. Within these classifications, systems are further defined by their source of supply: ground water or surface water. However, a seventh category of water system exists that is independent of the source of supply or the population served. This category is the purchased water category.

This document is part of the *7 Categories Guidance Series* which was designed to help public water systems understand and comply with the requirements of the CPDWR. It is the intent of this guide help purchased water systems determine their responsibilities and those of their suppliers.

Responsibilities of Purchased Water Systems

To determine the responsibilities of a purchased water system, the system must understand its relationship with the supply system from which it purchases water. A purchased water system is a type of consecutive system, but it may also be an integrated system, depending on its established agreement with the supply system.

Water System Categories
Public Water System (PWS): A system for the provision to the public of water for human consumption, through pipes or conveyances, that has at least 15 service connections or that regularly serves at least 25 people at least 60 days per year
• Community Water System (CWS): A public water system that serves at least 15 service connections used by year-round residents or that regularly serves at least 25 year-round residents.
• Non-Community Water System (NCWS): A public water system that is not a community water system (i.e., does not serve 25 or more year-round residents). • Non-Transient Non-Community Water System (NTNCWS): A water system that regularly serves 25 or more of the same people for more than 6 months per year. • Transient Non-Community Water System (TNCWS): A non-community water system that does not regularly serve at least 25 of the same people for more than 6 months per year.
• Purchased Water System: A water system that purchases water from another water system. Such as system may use ground or surface water and may serve community, non-community, transient, or non-transient populations.

Integrated System: two or more public water systems, one of which is a supply system, whose distribution systems are physically connected and who have agreed to operate using a common set of standards that the supply system establishes for the purposes of maintaining and protecting drinking water quality (1.5.2(58)).

Consecutive System: a public water system that receives, through purchase or other means, treated water from one or more supply systems and distributes only that water through a distribution system that it owns (Art. 1, Sect. 1.5.2 (17)).

Integrated Systems

A water system that purchases water from another water system is responsible for compliance with all CPDWR applicable to their individual source and population types, **unless** the system is part of an *integrated system* where the supply system has assumed responsibility for compliance. (Art. 1, Sect. 1.9.1 (a)).

Integrated systems must be approved by the state. Systems must submit an application to the state that includes the following (Art 1, Sect. 1.10.1):

- Detailed contact information for both the consecutive system and supply system (Art 1, Sect. 1.10.1 (a))
- Listing of each regulatory requirement being addressed (Art 1, Sect. 1.10.1 (a))
- Number of people served by each system (Art 1, Sect. 1.10.1 (b))
- Map of the supply system and consecutive system (Art 1, Sect. 1.10.1 (c))
- Sampling plan for each regulatory provision (Art 1, Sect. 1.10.1 (d))

- Copy of the agreement between the consecutive system and supply system (Art 1, Sect. 1.10.1 (e))
- Statement clearly assigning legal responsibility to one system for compliance (Art 1, Sect. 1.10.1 (f))

Consecutive Systems

A system that purchases treated drinking water from another water system is a *consecutive system*. A consecutive system may be included in an integrated system, as defined above, for the purpose of complying with one or more of the regulatory requirements applicable to consecutive systems.

Consecutive systems may or may not provide additional disinfection; however, they cannot be considered consecutive systems if they provide treatment other than disinfection. If such a public water system is required to meet additional or more stringent monitoring requirements or maximum contaminant levels than its supplier, it cannot be considered a consecutive system (Art. 1, Sect. 1.5.2 (17)).

Consecutive systems that sell water as a secondary aspect of their business only to recover costs (i.e. apartment buildings and commercial establishments) are exempt from the regulatory requirements. If an entity sells water for a profit, then it must meet the regulatory requirements (Art. 1, Sect. 1.91 (b)).

A supply system may remove a consecutive system from the integrated system provided that the supply system has given the consecutive system and the State thirty (30) days notice of the cause for such removal. The State may intervene in an attempt to resolve issue(s) between the systems (Art. 1, Sect. 1.10.4).

Where a consecutive system voluntarily separates from an integrated system, the consecutive system must immediately notify the State (Art. 1, Sect 1.10.5).

The State may revoke the approval of an integrated system for good cause (Art. 1.10.6).

Unless the supply system assumes responsibility, the consecutive system is responsible for the following:

- 1) Meeting the maximum contaminant level (MCL), monitoring, and other CPDWR requirements (Art. 1, Sect. 1.9.2 (a)), and
- 2) Complying with operator requirements of Regulation 100, the Water and Wastewater Facility Operators Certification Requirements (Art. 1, Sect. 1.9.2 (b)).

If the consecutive system is responsible for the above requirements, the system should consult the appropriate document in the 7 Categories Guidance Series to determine the specific details of those requirements based on the type of source water and the population served. These documents are available online at the Colorado Department of Public Health and Environment web site (www.cdphe.state.co.us/wq/drinkingwater).

Public Notice

Public water systems that sell or otherwise provide drinking water to other public water systems (i.e. to consecutive systems) are required to give public notice to the owner or operator of the consecutive system; the consecutive system is responsible for providing public notice to the persons it serves. (Art. 9, Sect. 9.2.1(c)(1))

Consumer Confidence Report (CCR) – A community water system that sells water to

another community water system must deliver the CCR information to the buyer's system (Sect. 9, Art. 9.1.2)

- 1) No later than April 1 annually or
- 2) On a date mutually agreed upon and include in the contract between the parties.