

Attachment A

Utah Division of Drinking Water Improvement Priority System (IPS) Program

I. Introduction

The Improvement Priority System (IPS) program is used by the Division of Drinking Water (the Division) to evaluate public water system compliance with Title R309 of the Utah Administrative Code, and to prioritize noncompliance for enforcement action. Under IPS, the Division assesses points for noncompliance or public health risk and assigns ratings to public water systems.

Three documents affect how the Division implements the IPS program:

IPS Program

The IPS program, which is this document, identifies the points associated with noncompliance and the point thresholds for assigning public water system ratings. Substantive changes to the IPS program must be approved by the Drinking Water Board.

Utah Administrative Code R309-400, Improvement Priority System and Public Water System Ratings

The IPS rule establishes the IPS program, the Division's and the Director's authority, and a public water system's responsibility. Changes to the rule must go through the official rulemaking process. The Division plans to revise R309-400 in 2019. The implementation of the revised R309-400 starts January 1, 2020.

IPS Implementation Standard Operating Procedure (SOP)

The IPS SOP outlines the Division's internal procedures for implementing the IPS program. The SOP may be modified as needed by the Division.

II. Assessment of Points

1. The Division will assess points based on noncompliance with Title R309 of the Utah Administrative Code, noncompliance with a directive or order issued by the director, or operational practices or performance that may result in a threat to public health.
2. In general, the Points assessed for each category of health threat are as follows:
 - a) Low health risk – 5 points
 - b) Minor potential to cause harm – 15 points
 - c) Moderate potential to cause harm; chronic monitoring violations – 25 points
 - d) Significant potential to cause harm – 50 points
 - e) Acute monitoring violations – 100 points
 - f) Imminent health threat (automatic not-approved status) – 200 Points

3. **Appendix A** of the IPS program contains a table specifying the number of points associated with each instance of noncompliance with a drinking water rule requirement and noncompliance with a directive or order issued by the Director.
4. **Appendix B** of the IPS program contains a table specifying the number of points associated with each instance of noncompliance with a drinking water rule requirement when a violation is issued.
5. The Division may remove points when a water system submits written documentation of correction of a deficiency and/or violation with supporting evidence or when the noncompliance is resolved. In some cases, a site inspection by the Division staff may be required.

III. Public Water System Rating Thresholds

1. The Division will rate a public water system based on the point thresholds shown below or based on a written agreement with the Director.
2. The point thresholds for rating a public water system as Approved or Not Approved are different for each type of water system and are given below:
 - Community Water System – 150 points
 - Non-transient Non-community Water System – 120 points
 - Transient Non-community Water System – 100 points
3. The Division will assign Ratings to water systems in accordance with R309-400 as follows:
 - **Approved** – the total number of points is below the point threshold
 - **Not Approved** – the total number of points is equal to or greater than the point threshold or the Director finds a threat to public health
 - **Corrective Action** – a water system has entered into a written agreement with the Director to resolve its deficiencies according to a compliance schedule

IV. Changes to the IPS Program

1. Substantive changes to the IPS program must be reviewed and approved by the Drinking Water Board.
2. The Division may make non-substantive changes to the IPS Program.

Date of Approval by Drinking Water Board: August 27, 2019

Public Water System IPS Report

Clarkston Town Water System PWS ID: UTAH03004 Rating: Approved 11/01/1986 Status: Active

Contacts	Site Information	Site Updates	Political Districts
Type: Administrative Contact Name: BRYAN VAUGHN GOODSELL Office: 435-563-9684 Emergency: Email: clarkstonpz@comcast.net	Address: P.O. BOX 181 , CLARKSTON, UT 84305 Phone: 435-994-1067 County: CACHE COUNTY System Type: Community Population: 750	Last Inventory Update: 07/01/2019 Last Surveyor Update: 09/12/2018 Surveyor: JULIE JENNIFER COBLEIGH Operating Period: 1/1 - 12/31 Last IPS Update: 11/23/2019 15:00:00	Representative: 1 Senate: 25 Water Usage Information per ERC

IPS SUMMARY			Total IPS Pts: 9
Admin & Physical Facilities	Quality & Monitoring	Significant Deficiency Violations	
9	0	0	

IPS COMPLIANCE SCHEDULES

Type	Required Activities	Severity	Created	Due
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ERROR:UDI	DEFCY PUBLIC NOTICE		07/27/2015	08/27/2015
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CONSUMER CONFIDENCE REPORT

Total Pts: 0

Violation No.	Period	Code	Description/Name	Points Effective
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PUBLIC NOTIFICATION VIOLATIONS

Total Pts: 0

Violation No.	Date	Code	Description/Name	Points Effective
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PHYSICAL FACILITY POINTS

Total Pts: 9

Code	Description	Severity	Points Effective	Details
M001	CURRENT EMERGENCY RESPONSE PROGRAM	REC	-10	Hide Details (1)
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PHYSICAL FACILITY POINTS

Total Pts: 9

Code	Description	Severity	Points	Details		
			Effective			
	Facility	Comments	Status	Determined Date	Not Effective	Assessed
		THE CRACKS IN THE TOP OF THE 150,000 GALLON RESERVOIR (EAST SIDE, NEARVENT) MUST BE REPAIRED		10/07/2003		0

SIGNIFICANT DEFICIENCY VIOLATIONS

Total Pts: 0

ID	Violation	Code	Deficiency	Determined	Points Effective
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LEAD COPPER MONITORING AND QUALITY VIOLATIONS

Total Pts: 0

Violation No.	Period	Code	Description/Name	Points Effective
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CHEMICAL MONITORING RULE VIOLATIONS

Total Pts: 0

Facility	Violation No	Period	Code	Violation Type	Analyte Group	Determined	Seasonality	Points Effective
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MICROBIAL RULE VIOLATIONS

Total Pts: 0

Date Range Start: 10/01/2018

Determine Date	Compliance Period	Code	Violation Type	Return To Compliance	Points Effective
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OPERATOR CERTIFICATION

Type	Level Required	Highest Certificate
Distribution	Dist 1	Dist 1
Treatment		

(Water use data is gathered through an annual survey conducted by the Division of Water Rights. More information here: www.waterrights.utah.gov/distinfo/wuse.asp)

WATER USE REPORT

Total Pts: 0

Violation	Points
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