

# STATE OF COLORADO

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Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department  
of Public Health  
and Environment

April 10, 2014

Mr. Kip Petersen  
Donala WSD  
15850 Holbein Dr  
Colorado Springs, CO 80921

Subject: Sanitary Survey of Donala WSD  
Public Water System Identification (PWSID) No. CO0121175  
El Paso County

Dear Mr. Kip Petersen:

This letter serves to report the findings of the sanitary survey conducted by the Field Services Section of the Colorado Department of Public Health and Environment's Water Quality Control Division ("the Department") at Donala WSD ("the Supplier") on March 13, 2014. The assistance that was provided during the sanitary survey was very helpful and is greatly appreciated. Table 1 identifies the parties present during the sanitary survey.

**Table 1: Parties Present**

Name	Organization
Mark Parker	Donala WSD
Kip Petersen	
Robert Hull	
Paul Hanson, PE	CDPHE
Heather Drissel, PE	

This letter is the Supplier's notification of any significant deficiencies and/or alleged violations of the *Colorado Primary Drinking Water Regulations* (Regulation 11), 5 CCR 1002-11 identified during the sanitary survey. A significant deficiency represents an unacceptable risk to public health or safe delivery of drinking water. Table 2 summarizes the number of findings and the required written response and resolution dates.

**Table 2: Sanitary Survey Findings**

Severity Category	Number Identified	Written Response Due (within 45 days of letter date):	Resolution Due (within 120 days of letter, or Department-approved alternate date):
Significant Deficiencies	0	No response required	No response required
Other Violations	0	No response required	No response required
Observations-Recommendations	8	No response required	Not applicable

**Significant Deficiencies:**

According to Regulation 11, Section 11.3(66), a significant deficiency means:

*any situation, practice, or condition in a public water system with respect to design, operation, maintenance, or administration, that the state determines may result in or have the potential to result in production of finished drinking water that poses an unacceptable risk to health and welfare of the public served by the water system.*

The Supplier's written response to this letter must address all items listed in this category. All significant deficiencies must be corrected and will be followed-up by the Department.

No Significant Deficiencies were identified.

**Other Violations:**

Other violations may be identified during a sanitary survey that are not significant deficiencies but must be corrected. The Supplier may be contacted by a compliance specialist from the Department's Compliance Assurance Section for additional follow-up on these violations. The Supplier must resolve these violations prior to the subsequent sanitary survey, which will be verified by the Department's inspector at that time.

No Other Violations were identified.

**Observations/Recommendations:**

While the Department does not directly follow-up on the observations/recommendations, the Supplier is advised to address them. The following observations/recommendations were identified:

**1. F313 - Finished Water Storage: Tank Fox Run (SDWIS ID: 017)**

*Storage Corrosion Protection:* Storage facility corrosion protection. Colorado Design Criteria for Potable Water Systems (Design Criteria), Section 7.0.17

A December 13, 2013 Fox Run tank inspection report from Inland Portable Services, Inc. was reviewed during the sanitary survey. The Fox Run tank inspection report noted delamination and dealloying (with 13 percent concentrated cell corrosion and surface corrosion noted) and recommended an interior blast and recoat. The Supplier appeared to be adequately evaluating cathodic protection and the inspection report with their engineering firm.

In addition, the Fox Run tank inspection report noted that the hatch does not have a gasket. Supplier staff clarified that the hatch is a heavy, metal overlapping lid with metal on metal contact, but that the Supplier plans to add a gasket as a precaution.

The Department recommends implementing the recommendations listed in the December 13, 2013 Fox Run tank inspection report.

**2. T995 - Treatment: Chlorinator Well 11d (SDWIS ID: 023)**

*Other Treatment Observations:* Inspector identified treatment observation.

During the sanitary survey, a PPG series 3000 tablet chlorination system at Well 11D needed to be rebuilt and was not available for use on an emergency basis. The Supplier was reminded that if the Supplier were to replace the emergency chlorination system with treatment other than a tablet chlorination system, then the Supplier would need to submit plans and specifications and receive approval from the Department.

It was also observed during that the sanitary survey that an inactive gaseous chlorine treatment plant was located near Well 1 (the treatment plant was not in use and did not contain treatment chemicals). Raw water from Well 1 is treated at the Robert Hull Treatment Plant. Because the inactive gaseous chlorine

treatment plant near Well 1 is not listed in the SDWIS database, the Supplier would need to notify the Compliance Assurance Section prior to utilizing the gaseous chlorine treatment plant near Well 1.

**3. S997 - Source: Well No 9a (SDWIS ID: 016)**

*Other Source Observations:* Inspector identified source observation.

The Well 9A wellhead is located in the water system's maintenance yard. While the traffic in the yard is limited to Donala employees, the Department recommends that the System install bollards or some other measure to protect the wellhead against the possibility of accidental damage.

**4. S997 - Source: Well No 8a (SDWIS ID: 015)**

*Other Source Observations:* Inspector identified source observation.

At the time of the sanitary survey, it was observed that Well 8A is located in the center of an unpaved U-turn area that is gated for access by Donala employees and contractors. During the sanitary survey, the inspection team discussed protecting the wellhead similar to other Supplier wellheads. The Department recommends the installation of a cage or other adequate structure to protect the wellhead.

**5. R997 - Monitoring & Recordkeeping and Data Verification:**

*Other Monitoring & Recordkeeping And Data Observations:* Inspector identified Monitoring, Recordkeeping & Data observation.

At the time of the sanitary survey, at EP002, the Supplier was monitoring free chlorine residual prior to the 53,000 gallon clearwell, instead of after the clearwell as specified in the Supplier's monitoring plan and 4-Log Certification Application (which was approved by the WQCD in a letter dated January 9, 2014). During the sanitary survey, the Supplier immediately moved the sampling location for EP002 to after the clearwell. The Division inspectors further noted that in addition to contact time provided by the clearwell, that additional contact time would occur in the treatment process because the Supplier prechlorinates.

**6. M990 - Management:**

*Other Management Observations:* Inspector identified system management and operation observation.

The Supplier's cross connection control activities in accordance with Section 11.37 of Regulation 11 of the CPDWR and records were reviewed at the time of the survey. The Supplier's inventory of cross connection control devices and test records was well documented and well organized. The Supplier's Rules and Regulations require commercial and irrigation backflow devices and reserve the right to require testing on any backflow device (including residential). The Supplier requires that commercial and irrigation backflow devices are testable devices, with testing by a State-certified backflow tester required before the device is used the first time and annually thereafter. The Supplier's Rules and Regulations further specify termination of service for failure to provide adequate cross connection control, and the Supplier has developed a warning letter that leads to a penalty and eventual disconnection of service if annual certified backflow test results are not provided to the District. It is recommended that the Supplier continue their process to review users and inventory all cross connection control devices, and to add a column to their tracking spreadsheet that denotes the date tested (in order to facilitate review of compliance with annual testing requirements).

**7. M990 - Management:**

*Other Management Observations:* Inspector identified system management and operation observation.

While the Department inspectors did not observe exceedences in the analytical results reviewed for the

Combined Radium-226 + 228 Maximum Contaminant Level (MCL), the inspectors did observe concentrations approaching the Combined Radium-226 + 228 MCL of 5 pCi/l (e.g., at EP024 on Oct 3, 2012, Radium-226 was 3.0 pCi/l and Radium-228 was 1.6 pCi/l). The Supplier blends water supplies to meet the MCL.

**8. M820 - Management:**

*Emergency Response Plan:* Supplier emergency response plan.

At the time of the sanitary survey, the Supplier had a robust written Emergency Response Plan (Plan) and also has online water quality monitoring stations located throughout the distribution system. The Supplier was commended for storing the Plan in a fire safe lock box and for their online monitoring efforts in the distribution system. It is recommended that the Supplier periodically update the list of contacts in the Plan.

**Field Verification/Sampling**

While performing the sanitary survey, the inspector verified operator certification requirements and performed water quality sampling for free chlorine residual. Table 3 indicates the operator certification verification for Donala WSD. Table 4 indicates the results of the water quality sampling performed onsite.

**Table 3: Operator Certification Verification**

Category	Required Certification Level	Name of Operator in Responsible Charge	Certification Level Held and No.	Certification Expiration Date
Treatment	B	Mark Parker	A - 4916	11/01/2015
Distribution	2	Mark Parker	4 - 4916	05/01/2014

**Table 4: Sampling Results**

Parameter	Sample Location	Value	Units	Notes
Disinfectant Residual	Entry Point 002	0.28	mg/L	Measured by Department at EP 002 during daily plant startup on the morning of the sanitary survey. SCADA records demonstrated compliance with 0.5 mg/L at EP's 001, 002, 024, and 013T.
Disinfectant Residual	14510 Bermuda Dunes Way	0.31	mg/L	

**Reminders**

- Regulation 11, Section 11.4(1)(b) (Prior Approval Required) requires the Department's approval prior to commencement of construction of any improvements, treatment process modifications, or the addition of new water sources.
- Most regulations, guidance documents, and forms are available via Internet on the Department's website. Please link to <http://wgcdcompliance.com> for further information.

Enclosed with this letter you will find a postage-paid Customer Satisfaction Survey Postcard. Please take a few moments to complete the survey and return it to the Department. Your efforts to provide feedback to improve the sanitary survey process are appreciated.

If you have any questions, please contact me by phone at (719) 545-4650 x101 or via e-mail at paul.hanson@state.co.us. Thank you for your time and cooperation.

Sincerely,



Paul Hanson, PE, Senior Field Engineer  
Field Services Section  
Water Quality Control Division  
Colorado Department of Public Health and Environment

cc: El Paso County  
Drinking Water File, PWSID No. CO0121175  
Pueblo Drinking Water File, PWSID No. CO0121175

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