



State of Utah

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DIVISION OF DRINKING WATER
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February 01, 2023

Grady Kohler
Wanship Water Co. LLC
5000 Old Meadow Lane
Park City, UT 84098

Subject: **Notification for Groundwater Required to Disinfect to Secondary Requirements – Wanship Cottage Sites #22019, Wanship Cottages Well (WS001)**

Dear Grady Kohler:

The Division of Drinking Water (the Division) records indicate that you are the responsible party for the Wanship Cottage Sites. The Wanship Cottage Sites water system is a public water system and thus subject to the Administrative Rules for Public Drinking Water Systems. The Division has determined that, based on recent water quality samples, Wanship Cottages Well (WS001) is a low-quality ground water source that does not reliably meet bacteriological standards. Wanship Cottage Sites is now subject to requirements to provide continuous secondary disinfection and meet the following requirements:

- Provide continuous disinfection and demonstrate compliance with secondary disinfection requirements through ongoing monitoring and reporting.
- Conduct monthly source assessment bacteriological monitoring of the Wanship Cottages Well (WS001) for assessment purposes.

You must notify the Division in writing, within 30 days of the date of this letter, what action will be taken to address the low water quality at this water source. This correspondence should be addressed to the Vulnerable Source Assessment Team at EQDWVSA@utah.gov. If these steps are not completed within 30 days from the date of this letter the Division may need to follow up with formal enforcement actions.

If you cannot complete the above steps within 30 days, the Division encourages you to apply for a Corrective Action Plan (CAP). The purpose of a CAP is to establish terms, conditions, and timelines for a water system to come into compliance with the significant deficiencies. A CAP can be granted if there are no violations associated with the deficiencies. A system can request a temporary CAP extension at requestcap.utah.gov. Nothing in the Corrective Action Plan prohibits the Division from taking further enforcement actions if a system fails to comply with the requirements in the Corrective Action Plan. If you have further questions regarding a CAP, contact Brandi Smith at (385) 515-1650.

Background

In June of 2022, Wanship Cottages Sites took a total of eight samples. Of the eight samples taken five were total coliform positive and *Escherichia coli* (*E. coli*) absent.

In August of 2022, this system took a total of thirteen samples. Six of those samples were distribution system samples and seven were triggered source samples. Two of the six distribution samples were total coliform positive and *E. coli* absent. Of the seven triggered source samples taken all of them were total coliform positive with one also being *E. coli* positive.

In September of 2022, four more distribution system repeat samples were taken and one was total coliform positive and *E. coli* absent. Four triggered source samples were taken and two of the four were total coliform positive and *E. coli* absent. Between August and September of 2022, there were nine samples at Wanship Cottages Well (WS001) that were total coliform positive and one sample that was *E. coli* positive.

The positive total coliform sample results indicate that Wanship Cottages Well (WS001) source is a low-quality ground water source that does not consistently meet standards of bacteriologic quality.

Based on your sample history, Wanship Cottage Sites is subject to requirements to provide continuous secondary disinfection of the Wanship Cottages Well (WS001) and may be subject to additional treatment if further water quality sampling results indicate that any of Wanship Cottage Sites's sources require primary disinfection.

For Existing Chlorinators

The Division does not have sufficient information on the existing chlorinator (Wanship Cottages Well Chlorinator, TP001) to determine if it is designed to meet all requirements for secondary disinfection. Please provide documentation that the following requirement is met within 120 days to avoid the addition of deficiency points to **Wanship Cottage Sites Water Sytem's** IPS report:

- TD22 – Lacks backup power supply for required disinfection (SIG, 25 points)
- TD01 – Continuous disinfection is required but lacks automatic switchover (MIN, 15 points)

Significant deficiencies must be resolved within 120 days or the system must enter into a corrective action plan with the Division. Failure to either resolve the deficiency or enter into a CAP within 120 days will result in a treatment technique violation as stated in R309-215-16(4)(a).

Required Actions

Wanship Cottage Sites is subject to requirements for secondary disinfection monitoring and reporting, as described in Addendum A. Wanship Cottage Sites must comply with these requirements within 30 days from the date of this letter.

Complete the bacteriological source assessment sampling described below.

Bacteriological Source Assessment Sampling Requirements

Based on the determination that Wanship Cottages Well (WS001) is subject to secondary disinfection, the following monitoring is required:

1. Bacteriological Source Sampling

- a. This system is subject to take monthly *Escherichia coli* (*E. coli*) samples at Wanship Cottage Well (WS001) (assessment monitoring) during the operating period and shall continue for a minimum of 18 months. **This schedule will begin March 2023.**
- b. This sample is in addition to the monthly distribution system sample (DS001). Please label the source sample as WS001 (for both the facility ID and sample point ID) on all laboratory forms.
- c. Please contact Sitara Federico for any positive samples that may occur at the source at 385-515-1459 or sfederico@utah.gov. If any sample result comes back as *E. coli* positive, please contact the Division within 24 hours of being notified of the result.

Please note that you must notify the Division in writing within 30 days of the date of this letter what action will be taken to address the low water quality at this water system. If Wanship Cottage Sites does not take the steps outlined in this letter, the Director may need to follow up with formal enforcement actions to protect public health. This correspondence should be addressed to the Vulnerable Source Assessment Team at eqdwvsa@utah.gov.

Please contact Sarah Page at (385) 272-5778 or sepage@utah.gov if you have any questions or need technical assistance.

Sincerely,



Mark Berger
Rules Section Manager

Enclosures: Addendum A - Secondary Disinfection Monitoring and Reporting Requirements
Operational Report_GWRD Secondary

cc: Grady Kohler, Wanship Cottages Sites, grady@wanshipwater.com
Nathan Brooks, Summit County Health Dept, nbrooks@summitcounty.org
Julie Cobleigh, District Engineer, jjcobleigh@utah.gov
Mark Berger, Division of Drinking Water, mberger@utah.gov
VSA Team, Division of Drinking Water, eqdwvsa@utah.gov
Sarah Page, Division of Drinking Water, sepage@utah.gov
Sitara Federico, Division of Drinking Water, sfederico@utah.gov
Luke Treutel, Division of Drinking Water, ltreutel@utah.gov
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Jennifer Yee, Division of Drinking Water, jyee@utah.gov

Addendum A - Secondary Disinfection Monitoring and Reporting Requirements

To meet secondary disinfection requirements, Wanship Cottage Sites will be required to continuously maintain a minimum of 0.2 mg/L free chlorine residual at the Point of Entry (POE) into the system and demonstrate a detectable chlorine residual in the distribution system.

Secondary Disinfection Requirements and Reporting

1. Chlorine Residual – Point of Entry (POE) to Distribution System (EP001)

- a. The POE sampling location will be identified as **EP001** in the Division's database.
- b. Maintain a minimum of 0.2 mg/L residual (measured as free chlorine) at the POE sampling location. [R309-215-16(3)(b)(iii)(A)(I) and (II)]
- c. The chlorine residual concentration measured at the POE sampling location shall not exceed the maximum residual disinfectant level (MRDL) of 4.0 mg/L (measured as free chlorine). [R309-200-5(3)(c)(iv)]
- d. Record and report the lowest daily chlorine residual concentration, measured as free chlorine, at the chlorinator POE sampling location (EP001) **a minimum of daily**. [R309-210- 8(3)(a)(ii)]

2. Chlorine Residual – Distribution System (DS001)

- a. This water system must **maintain a detectable residual throughout the distribution system**. It is recommended to maintain the chlorine residual above 0.1 ppm in the distribution system. [R309-520-5]
- b. The chlorine residual measured in the distribution system shall not exceed the maximum residual disinfectant level (MRDL) of 4.0 mg/L (measured as free chlorine). [R309-200-5(3)(c)(iv)]
- c. Take **a minimum of three (3) chlorine residual samples per week at varying locations throughout its distribution system (DS001)**. [R309-105-10(1)(c)]
- d. Distribution system chlorine residuals must be taken in conjunction with total coliform sampling. [R309-215-10(3)]

Disinfection Report Submission

To demonstrate ongoing compliance with secondary disinfection requirements, the **Wanship Cottage Sites** water system must complete monthly operational reports for each active chlorinator using a template approved by the Division.

1. **Operational reports are submitted quarterly**. The operational report template has been enclosed with this letter. The reports are due to the Division by the 10th day following the end of each reporting month or quarter (i.e., January 10th, April 10th, July 10th and October 10th for quarterly reports). The reports can be submitted by hardcopy, fax, or email at DDWReports@utah.gov. Please contact Luke Treutel at (385) 258-6084 or ltreutel@utah.gov to schedule training regarding proper reporting.
2. In addition to monthly disinfection reporting, this water system must submit the monthly average of chlorine residual samples taken in the distribution system. Distribution system chlorine residual monitoring results are due quarterly by the same compliance dates as the monthly disinfection report and can be submitted via an online form found at mrdl.utah.gov. Maintain monitoring records for a minimum of 5 years. [R309-105-17(1)]