

Department of Environmental Protection
Bureau of Safe Drinking Water - Capability Enhancement Program
Technical-Managerial-Financial (TMF) Capability Weaknesses

PWSID: _____ System Name: _____ Capability Score: _____

Evaluators Name/Contact Information #: _____

A capability score is calculated based on a system’s compliance history. Systems having a capability score of ≥ 200 have been identified as having capability weaknesses based on their inability to consistently comply with safe drinking water regulations. The Department of Environmental Protection (Department) conducts onsite TMF capability assessments at these systems as part of their PENNVEST capability review. Capability weaknesses are root cause issues that prevent water systems from maintaining compliance or maintaining long term viability. The capability weaknesses marked below with an “X” in column C were identified at your water system. These capability weaknesses are required to be addressed prior to receiving Drinking Water State Revolving Fund (DWSRF) funding or as part of the DWSRF funded project. Note that all acute violations must be addressed immediately. A prompt response is requested in order to complete the PENNVEST capability review in a timely manner.

Table of Capability Weaknesses

A. Item No	B. Capability Weakness	C. Must Address Prior to Funding or as Part of the Funded Project	D. Regulatory Citation
Significant Capability Weaknesses			
1.	Imminent Threat Violations: (A2) <ul style="list-style-type: none"> • Failure of key water treatment processes Acute violations (A3) <ul style="list-style-type: none"> • Surface or GUDI system without filtration 		109.202 MCLs, MRDLs or Treatment Technique Requirements

2.	<p>Priority Violations:</p> <p>(B1)</p> <ul style="list-style-type: none"> • Failure to provide an adequate supply of water • System is having problems with water quantity, meeting demand, inadequate supply • If excessive water loss leads to water outages, could qualify as B1 <p>(B2)</p> <ul style="list-style-type: none"> • Failure to provide an adequate min residual in dist • Inadequate Disinfection in Distribution System <p>(B3)</p> <ul style="list-style-type: none"> • Water system is not in compliance with MCLs, MRDLs or Treatment Technique Requirements <p>(B4)</p> <ul style="list-style-type: none"> • Not in compliance with Department order <p>(B5)</p> <ul style="list-style-type: none"> • System has unpermitted source(s) connected to the system 		<p>109.607 Pressures (related to design); 109.4 General Requirements;</p> <p>109.710 Disinfectant residual in the distribution system;</p> <p>109.202 MCLs, MRDLs or Treatment Technique Requirements;</p> <p>109.603 Source quality and quantity;</p> <p>Per Department order;</p> <p>109 Subchapter E. Permit Requirements</p>
3.	<p>Operation/Administrative Violations (C,D,E) that are contributing to an imminent threat or priority violation, or when the violation is chronic/persistent</p> <p>(C1)</p> <ul style="list-style-type: none"> • Chemicals, materials and/or equipment do not meet ANSI/NSF 60 or 61 <p>(C4)</p> <ul style="list-style-type: none"> • If lack of financial planning is contributing to the failure to properly operate or maintain the PWS • Water treatment plant is unattended during periods of operation and alarms do not allow for fast response to water quality problems <p>(C7)</p> <ul style="list-style-type: none"> • System has outstanding permit violations 		<p>109.606 Chemicals, materials and equipment;</p> <p>109 Subchapter E. Permit Requirements;</p> <p>109.703 Facilities Operation</p> <p>109.701 (a)(3)(iii) Circumstances exist which may adversely affect the quality or quantity of drinking water</p>
4.	<p>Process control decisions are being made without an SOP by someone other than the operator in responsible charge</p>		<p>302.1203 Process Control Decisions</p>
5.	<p>System refuses TMF Capability Assessment, other department inspection, or fails to produce requested items covered under 109.6</p>		<p>109.6 Inspection Authorization</p>

6.	System has not conducted disinfection profiling and benchmarking when required		109.204 Disinfection Profiling and Benchmarking
7.	System is not in compliance with monitoring and reporting requirements		109.301 General Monitoring Requirements 109.701 Reporting and record keeping
8.	EPA analytical method not being followed for sampling, analysis or calibration		109.304 Analytical requirements
9.	System has not submitted Available Operator Report and/or fee		302.1206 Operator in responsible charge 302.202 Operator certification program fees
10.	System has failed to identify an owner or responsible official		109.4 General Requirements
11.	System has not submitted a Primary Facilities Report, a Sub-facilities Report, or a Water Allocations Report		Water Rights Act Act 220-Chapter 110, Subchapter C 109.701 (b) (2)
12.	System does not have necessary SOPs		109.702 Operation and Maintenance Plan 302.1204 Standard operating procedures
13.	System does not have an Operation and Maintenance (O&M) Plan, O&M Plan needs updated, or system is not implementing their O&M Plan		109.702 Operation and Maintenance Plan
14.	Funded project will cause a significant change to disinfection process, disinfection practice, or will affect disinfection efficacy and system has not conducted disinfection profiling and benchmarking		109.204 Disinfection Profiling and Benchmarking
15.	System has not corrected significant deficiencies identified in a Sanitary Survey		109.705 Sanitary Surveys; 109.4 General Requirements
16.	No properly certified operator		109.704
17.	Violation(s) that contributed to an ETT Score \geq 11 remain unaddressed		Per memo from Cynthia C. Dougherty w/ EPA's interpretation of SDWA 1452(a)(3) requirements
18.	No ERP or ERP needs updated		109.707 Emergency response plan
Weaknesses Contributing to a Significant Deficiency		The following capability weaknesses may be included in the above list of weaknesses needing to be addressed if contributing to a significant deficiency and adversely affecting operations.	
1.	Cross-Connection present or no Cross-Connection Control Program		109.709 Cross-connection control program (at the direction of DEP) 109.608 Cross-connections
2.	System has a history of noncompliance, consolidation/interconnection is an option, and the system has not evaluated whether consolidation/interconnection is the most feasible/viable option.		109.4 General Requirements
3.	System does not have an Asset Management Plan		109.4 General Requirements

4.	Inadequate record keeping & maintenance of records		109.701 Reporting and record keeping
5.	System is not maintaining a Monthly Operations Report (MOR)		109.701 Reporting and recordkeeping
6.	Water system has not conducted a Sanitary Survey		109.705 Sanitary Surveys
7.	No Distribution System Map		109.706 System Distribution Map
8.	Lack of resources adversely affecting operations		109.701 (a)(3)(iii)(H)—lack of resources that adversely affect operations, such as staff shortages 109.704 (a) & (b) Operator Certification
9.	System is not practicing full cost pricing which is adversely impacting operations		109.4 General Requirements
10.	System only has one source of water		109.602 & PWS Manual-Part II
11.	System does not have redundant processes or backup treatment		109.602 & PWS Manual-Part II
12.	Last FPPE evaluation rating was “needs improvement” and priority comments have not been addressed (surface and GUDI systems only)		N/A
13.	Lack of in house training is adversely affecting operations		N/A
14.	Chemical feed pumps are not routinely calibrated and/or dosage charts are not used or available and is adversely affecting operations		109.4 General Requirements
15.	System exercises interconnect valve less frequent than annually; if one exists		109.4 General Requirements 109.702 Operation and maintenance plan

Narrative description of identified capability weaknesses: