Department of Health and Human Services
Maine People Living Safe, Healthy and Productive Lives

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DETERMINING CLASSIFICAITON AND OVERALL POPULATION POLICY

PURPOSE: This policy is for determining the classification and overall population of Public Water Systems (PWSs) that have one, or more than one population type: Community (C), Non-Transient Non Community (NTNC), or Transient (T). This policy is written to further clarify and to be used in conjunction with the Multiplication Factor Policy (DWP0084).

SCOPE: This policy applies to all establishments being evaluated as public water systems.

ORIGINATOR/OWNER: Nate Saunders

RESPONSIBILITIES: Field Inspectors working with the Field Inspection Team Manager are responsible for determining the classification and overall population of a PWS.

POLICY: Determining Classification and Overall Population of Public Water Systems with One, or More than One Population Type: C, NTNC, or T

Background: Determining if an entity is or is not a PWS, what its classification is, and what its population is can be a simple or challenging task; there can be many complicating factors. It is the intent of this policy to document an understandable and consistent procedure by which PWS classification and population can be determined.

Foundational elements of this policy are:

1. Referring to the federal definition of the most basic type of public water system, when 25 people are served or have access to water for 60 or more days a year, the entity is a public water system.

2. Overall population is used for a number of purposes, some of which are: determining if an entity is a PWS, determining a PWS's sampling requirements, and determining a PWS's AFM (Alternative Funding Mechanism) fee.

3. When describing different PWS classifications, the Community classification is considered the "highest" classification, higher than NTNC, which is higher than Transient, for the following reasons:

    - Community consumers have higher exposure to water than NTNC or T consumers.
    - Community systems are more likely to be more complex than NTNC or T systems.
    - Community systems are subject to more regulations than NTNC or T systems.

Highest (Classification)	Community
|	
|	NTNC
V	
Lowest (Classification)	Transient

POLICY: For determining the classification and overall population of PWSs with one, or more than one population type, "Higher" classification populations are added down to "Lower" classification populations, but not vice versa: C onto NTNC onto T only.

1. Clarification on the policy for determining the classification of a PWS with one, or more than one, type of population:

For the purpose of determining the PWS Classification, "higher" classification population is added to, and counts toward, the population of a PWS with "lower" classification: C onto NTNC, onto T.

Note that higher classification population (e.g. Community) has more exposure to the water than population meeting the lower PWS classifications (NTNC or Transient). Therefore, the population with higher classification is included as population served by the PWS of lower classification. (In the past for example, when determining a Transient population, the people in one house attached to a restaurant may not have been included as "population served" because they were "Community" population, even though they had more exposure to water than the Transient population. This policy changes that practice.)

Examples:

A. For the purpose of PWS classification, Community population is added to NTNC population to determine a NTNC population. For example, a single well serves 5 apartments and a store with 15 Full Time Equivalent employees. The Community population of 5 x 2.5 people/apt = 12.5 is added to the 15 NTNC (employees) and results in a total NTNC population of 27.5. (See DWP0084) Note that this system does not have enough Community population to be a Community system, but it will be a NTNC system with a population of 27.5

B. For the purpose of PWS classification, Community (year round residents) and Non-Transient Non-Community (the number of employees) populations are added to the Transient population. For example, a well serves a single residence and a restaurant. The restaurant is open more than (6) months a year, serving two meals a day, has (8) seats and (2) staff. The Community population (2.5) and NTNC population of (2) is added to the Transient population of (8 x 3 people per seat[see Mult. Factors] = 24) to result in a Transient population of 28.5. The system does not have enough Community population to be a "C" system, does not have enough NTNC population to be a NTNC system, but it will be a Transient system with a population of 28 (rounding down, to the benefit of the PWS). In this case, none of the individual population types meet the criteria of a PWS, but the combination of populations does meet the criteria of a PWS (a Transient PWS).

C. For the purpose of PWS classification, NTNC (employee) and Transient populations **are not added upward** into a Community population.

D. For the purpose of PWS classification, Transient population **is not added upward** into a NTNC population.

2. Clarification on the policy and procedure for determining the overall population of a PWS with one, or more than one, type of population (all of which are consumers of water from the same source):

The overall population of a PWS includes the population of the PWS classification, plus any higher classification population that is also served by the same water supply.

Note that higher classification population (e.g. Community) has more exposure to the water than population meeting the lower PWS classifications (NTNC or Transient). Therefore, the population with higher classification is included as population served by the PWS of lower classification.

A. Community population = (service connections) x 2.5
B. NTNC population = (NTNC population) + (Community population)
C. Transient population = (Transient pop.) + (NTNC pop.) + (Community pop.)

PROCEDURE:

A. Determine the highest PWS classification for which there is enough population to meet that classification.

- For a ski area water system serving less than 10 condominium residences, with less than 25 staff, and a lodge/restaurant that meets the criteria of a Transient PWS, this system classification would be “Transient”.
- For a ski area water system serving less than 10 condominium residences, with more than 25 staff, and a lodge/restaurant serving any number of transient population, this system classification would be “NTNC”.
- For a ski area water system serving more than 10 condominiums used for “year-round residents” (year round defined as permanent residence greater than six months, DWP0084), any number of employees, and a lodge/restaurant serving any number of transient population, this system classification would be “Community”.

- If an entity has no single population type that is large enough to meet the criteria of a PWS by itself (<25 C, < 25 NTNC, and < 25 T), but has a combined population served of more than 25 people, this system classification would be “Transient”.

B. If the PWS only meets the Transient classification, then any Community (condominium) population and any NTNC (employee) population are added to the Transient population to determine the overall “Transient” PWS population. (Note: The exposure of Community and NTNC consumers to water is greater than that of Transient consumers. Therefore, Community and NTNC population should count as population served by the Transient PWS.)

C. If the PWS meets the NTNC classification, then any Community (condominium) population is added to the NTNC population to determine the overall “NTNC” population. (Note: The exposure of Community consumers to water is greater than that of NTNC consumers. Therefore, Community population should count as population served by the NTNC PWS.)

D. If the PWS meets the Community classification, then the overall "Community" population is determined as the number of service connections multiplied by 2.5 (DWP0084).

Notes:

1. Any "Transient" classification determination made in this policy assumes 60 days or more of operation per year, otherwise it would not meet the criteria of being a PWS.

2. This policy is used in conjunction with the Multiplication Factors Policy (DWP0084) to determine whether a system is or is not a PWS. As a result, some small systems that would not be considered a PWS using one multiplication-factor calculation alone, would be considered a PWS when the populations are combined per this policy. For example, a small system that has no single population type that meets PWS criteria, but has a combined population that meets the minimum PWS criteria of serving 25 people, 60 days per year, would become a regulated PWS (a Transient PWS). Specifically, a campground may have less than 10 campsites, yet when C population (two homes served by the same water system) and NTNC populations (campground employees) served by the same water supply are added to the T population, the overall population may become greater than 25, resulting in the entity becoming a regulated PWS (in this case, a Transient PWS).

3. The implementation of this policy and the changes that it will bring about will be accomplished via the Sanitary Survey, over the five year cycle by which all sanitary surveys in the state will be redone. Obvious changes that benefit the few NTNC systems that will have their populations reduced can be implemented as soon as the Field Staff can address the situation.

ASSOCIATED DOCUMENTS:

- Multiplication Factors Policy (DWP0084)

SUPERCEDED DOCUMENTS: None

RETENTION:

This document is retained per the DWP Record Retention Schedules.

REVISION LOG

Section	Page	Rev.	Date	Description Of Change	Approved by:
		Original	8/8/05		Nancy Beardsley
New sections added. Notes	1, 4	A	8/20/12	New document format. Removed PWS-specific, out-dated consequences of adopting the policy (AFM related), minor wording changes for clarification that do not affect policy.	Nathan Saunders