

The State of New Hampshire
Department of Environmental Services

Thomas S. Burack, Commissioner



*Celebrating 25 Years of Protecting
New Hampshire's Environment*

January 23, 2014

Kevin McKinnon
Colebrook Water Works
37 South Hill Road
Colebrook, NH 03576

Notice of Violation

**Subject: Colebrook, Colebrook Water Works (PWS ID: 0481010)
Water Conservation Plan Compliance**

Dear Mr. McKinnon:

On November 2, 2009, the Department of Environmental Services (“DES”) Drinking Water and Groundwater Bureau approved a Water Conservation Plan (“WCP”) for Colebrook Water Works in accordance with Env-Wq 2101, *Water Conservation Rules*. The WCP included details related to complying with the water conservation rules, as well as a response plan to address reducing the percentage of water losses and unmetered authorized consumption to below 15% of system input volume, as required per Env-Wq 2101.09 (previously Env-Wq 2101.05(m)).

The table below outlines the status of loss reduction since 2009. More than twice the volume of water necessary to satisfy customer demand has been pumped from sources and every year Colebrook has lost more water than it has sold to customers.

YEAR	PRODUCTION (Million Gallons)	METERED USE (Million Gallons)	LOSSES (Million Gallons)	LOSSES (%)
2010	150.38	44.70	105.68	70.3%
2011	119.34	38.90	80.44	67.4%
2012	104.34	22.23	82.11	78.7%
2013	98.34	21.20	77.14	78.4%

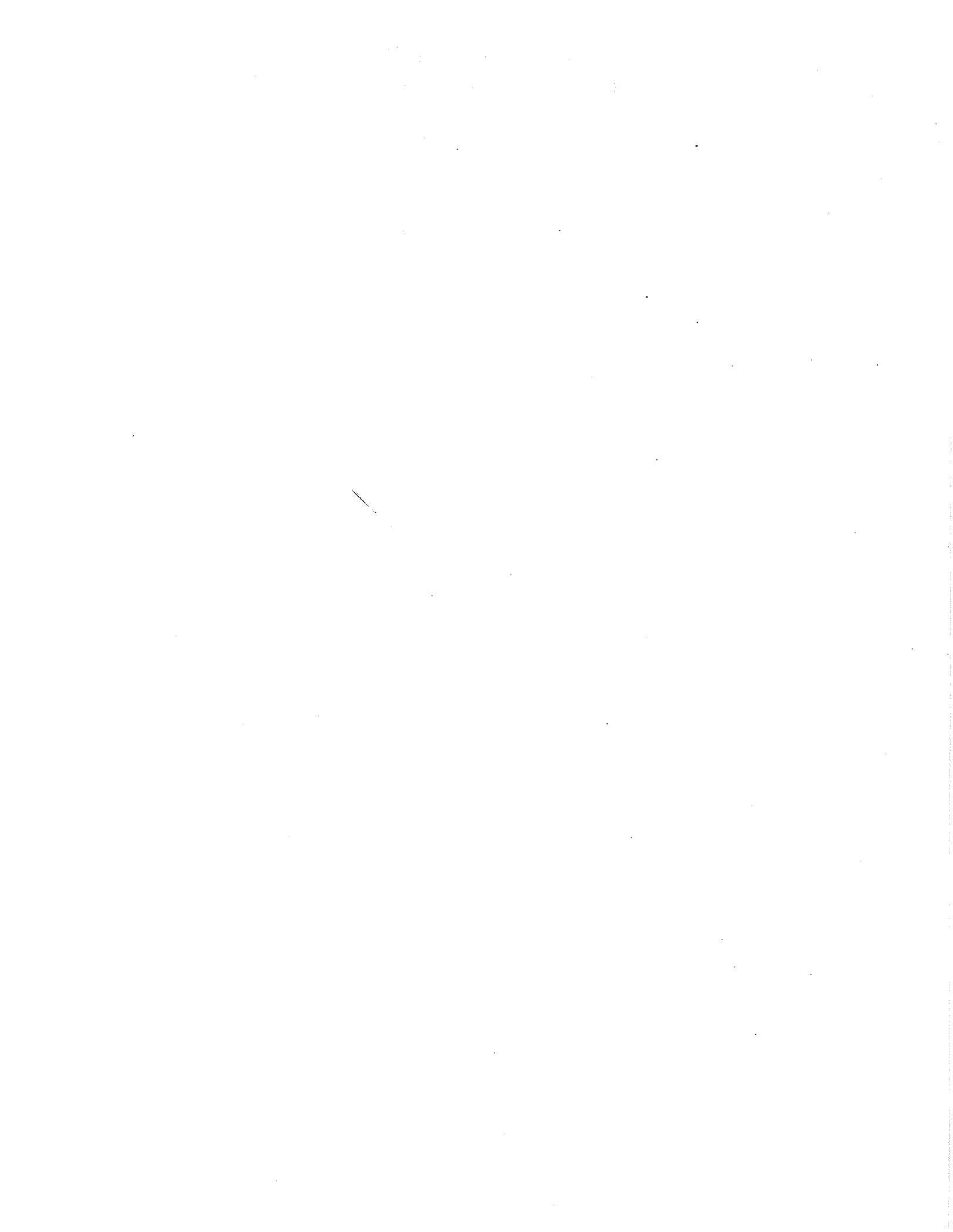
Based on correspondence received from April Hyde, Chief Operator, on June 20, 2011, and a meeting with you and Ms. Hyde on July 27, 2011, DES determined the following:

1. While ongoing acoustic leak detection and leak repair continued, the 4-year water main replacement project proposed to address large water losses had not progressed as proposed in the WCP due to a lack of financial resources.
2. Despite funding issues, customer water rates had been lowered since 2009.
3. The water audit submitted on June 20, 2011 indicated that in 2010 approximately 105 million gallons or 70% of water distributed into the system was lost. This is equivalent to a 198 gallon per minute (gpm) leak and reportedly \$350,000 worth of non-revenue water.

www.des.nh.gov

29 Hazen Drive • PO Box 95 • Concord, NH 03302-0095

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4. Service meters were changed out when they no longer worked, although the proposed service meter change-out program stipulated a ten year cycle.
5. The age of the existing service meters were not known; therefore, there was no information available to base the meter change-out program on.
6. The source meters for GPW #1 and #2 had not been tested or calibrated on an annual basis as proposed in the WCP. The meter was also not installed properly.

In response DES issued a letter to you on August 4, 2011 requesting a Compliance Assurance Plan (CAP) be submitted to DES to address the above.

On September 26, 2011, DES received a CAP proposing the following:

1. The schedule for the water main replacement project would be moved to 2014.
2. A leak detection and repair program would continue to be implemented.
3. Customer rates had been increased since our last meeting.
4. A service meter registration program would be implemented.
5. The water meters on GPW #1 and #2 would be calibrated.

On October 10, 2011, DES approved the CAP on the condition that progress reports would be submitted to DES on December 1, 2011 and June 1, 2012.

Based on review of the progress reports and an ongoing compliance report submitted, as well as correspondence with you and Ms. Hyde, DES has determined the following:

1. The main replacement project has not progressed as proposed in the WCP and has been rescheduled to 2016.
2. Water losses increased from 70% in 2010 to 79% in 2012. (Note* Production volumes decreased by approximately 46 million gallons, but billed metered use decreased by approximately 50% or from 44.7 million gallons to 22.23 million gallons with no known reason.)
3. Between 2010 and 2013, 66 service meters were replaced, totaling approximately 14% of all service meters. Therefore, 86% of service meters continue to be used beyond recommended timeframes.
4. In February 2013, a new source meter was installed on GPW #1 and #2.

You are hereby notified that a violation of Env-Wq 2101.09 (**previously Env-Wq 2101.05(m)**) has occurred as a result of failing to decrease water losses to below 15% within the timeframes of the approved response plan.

You are hereby notified that a violation of Env-Wq 2101.06 (**previously Env-Wq 2101.05 (d)**) has occurred as a result of failing to maintain service meters.

In response, complete the following:

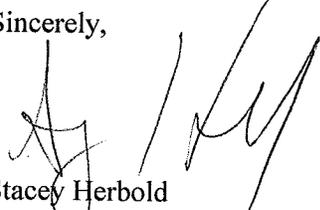
1. **Within 30 days of the date of this NOV**, submit a revised Compliance Assurance Plan to DES documenting how compliance will be achieved to decrease losses and the timeline for completion. The CAP should address and include a timeline (month and year) for the following:
 - a. Investigation into why billed use has varied so much and correction of the problem detected;
 - b. Number of service meters to be changed out and a deadline for change out;
 - c. A date of when funds will be applied for to fund the Main Street water main replacement project and the new deadlines for the project; and
 - d. Details of ongoing in-house leak detection.
2. Implement the revised CAP upon approval from DES; and
3. Submit all correspondence to:

Stacey Herbold
NHDES Water Use & Conservation Program
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Please note: Failure to comply with this Notice of Violation will result in the issuance of a Letter of Deficiency or other enforcement action, which will be posted on the DES website and remain posted for a period of 5 years after compliance is achieved.

If you have any questions prior to responding or if you would like to schedule a meeting discuss a strategy for addressing water loss, please contact me by phone at (603) 271-0659 or by email at stacey.herbold@des.nh.gov.

Sincerely,


Stacey Herbold
DES Drinking Water and Groundwater Bureau

cc: April Hyde, Primary Operator
Rebecca Merrow, Town Manager
Colebrook Board of Selectman
Derek Bennett, NHDES