RECORDING PROJECTS

Question: *What types of needs should I include in the questionnaire?*

Answer: Record the capital improvement projects that your system needs to address over the next 20 years. Consider your entire system inventory. Capital projects include new installation and replacement or rehabilitation of existing infrastructure for source water, treatment, storage, pumping, transmission, and distribution. Do not include non-capital needs such as O&M, studies, or administrative costs.

Consider current as well as future needs. Record projects that are needed now, even if funding is not currently available for the project. Record projects for which you already have funding as long as they have not begun construction by January 1, 2015. You should also record projects that may not currently be necessary but that you anticipate needing before December 31, 2034.

Include projects even though you may not have final engineering design or cost estimates. Projects in the planning stage can be included if they are shown to be necessary, feasible, and your system has committed to completing the project. If there is no cost estimate available, EPA will model the cost based on the size of the project. Be sure to include the appropriate design parameters for cost modeling.

Finally, include additional projects that you are planning that have green infrastructure or climate resiliency-related needs. Examples include a berm for a pump station at risk for flooding or elevating an emergency power generator.

Question: *What types of projects are allowable?*

Answer: Most capital improvement projects needed to obtain or maintain safe drinking water for current customers are allowable and should be included. To answer this question, it is easier to list those that are not allowable. The major categories of unallowable projects are:

- Projects that are not Drinking Water State Revolving Fund (DWSRF) eligible, such as those where a substantial portion is for anticipated future growth or for fire protection or for raw water reservoir or dam-related needs.
- Projects for source water protection.
- Projects that are not for capital improvements. Examples of non-capital projects include operations and maintenance costs, studies, water rights or fee payments, sample collection or analysis fees, or employee wages and other administrative costs.
- Projects that are not necessary to help the water system meet its public health goals. Examples include projects for demolition of existing infrastructure (unless an allowable project will be constructed at that site and requires the demolition), projects for improving aesthetics of facilities, buildings and parking facilities not essential to providing safe drinking water, acquisition of...
land (unless it is part of an allowable project), or connecting existing homes that already have an adequate drinking water supply.

- Projects for which construction has already started by January 1, 2015.
- Multiple projects that meet the same need or repeated projects that address the same piece of infrastructure. Examples include a project for a well and a separate project for a pump for that well (well projects are assumed to include a pump) or rehabilitating the same finished water storage tank more than once in the 20-year survey period.

**Question:** The number of users served by our water system is expected to double over the next 10 years. Do we include projects for future water users?

**Answer:** Projects included in this survey must be necessary to serve current customers and/or other existing homes that don’t currently have adequate water and are not connected to your system. Do not included projects where a substantial portion of the project is for future growth or to entice development of an area. However, you can reasonably size projects needed for current customers to accommodate anticipated future growth. The project’s documentation should explain the basis for the additional capacity.

**Question:** I understand that operation and maintenance (O&M) needs should not be included in the questionnaire. How is O&M defined for this survey?

**Answer:** Routine maintenance of equipment such as repair of valves or generators and part replacement performed as preventive maintenance are not included in this survey. However, rehabilitation of major infrastructure components such as storage tanks and pump stations, where the infrastructure is restored to near new condition, are allowed.

**Question:** Can I use more than one type of need code for a project?

**Answer:** Multiple type of need codes can be used for a project only if you are providing a documented cost estimate. For instance, if you have a cost estimate for drilling and completing a new well and installing a treatment facility with chlorination, the project can have the new well and new treatment facility types of need included. However, if no cost is provided, each of the components (the well and the ground water chemical feed) must be recorded as their own project so that EPA can model the costs.

**Question:** Can I use more than one reason for need, regulation, or documentation code for a project?

**Answer:** Yes. You can use as many codes as needed to explain the reason for the projects listed and to identify the applicable regulation(s) or secondary purpose and the type of justification or documentation provided. However, the codes should match reasons and regulations stated in the documentation. It is not uncommon for a project to have more than one of these types of codes.
Question: *What is the difference between the codes for “Expand/Upgrade” and “Rehabilitate?”*

Answer: The “Expand/Upgrade” code is used only in reference to a complete treatment plant (type of need codes T10 – T24). It is not used for any individual treatment components. It indicates a complete plant needs to undergo major improvements that may add or change unit processes or result in an increase in capacity. Examples include upgrading from direct to conventional filtration, adding membrane filtration to a direct filtration plant, or adding a treatment train to expand capacity.

The “Rehabilitate” code can be used for most system components as well as for a treatment plant. It indicates that the infrastructure needs to undergo substantial work (beyond O&M) to restore it to “like-new” condition. An example is cleaning and lining existing water mains.

**DOCUMENTING PROJECTS**

Question: *How do I document the need for my projects?*

Answer: This is the most important element of the survey. If a need is not documented, it will not be included. There are two types of documentation of need that may be used to justify projects for the survey: independent and survey-generated. List 4 in the *Lists of Codes* provides the most common types of documentation of need.

- **Independent documentation** is documentation that was generated independently of this survey. Independent documentation was written for purposes other than the survey as part of the water system’s typical planning process. Examples include a Capital Improvement Plan, an engineer’s estimate for a specific project, or a sanitary survey report. You may submit the complete document or send an excerpt from it that describes the specific project and includes the document title and date. Please write the project number near the text that discusses each project.

- **Survey-generated documentation** is documentation written specifically for the survey by the system or the system’s engineer or other representative, or by the state. Survey generated documentation should include a description of the project(s) and a statement of why the project(s) are necessary. Please sign and date your statement. Survey-generated documentation may also be used to supplement or clarify a project that has independent documentation but the reason for need is not clear in the independent document.

Question: *What type of cost documentation is useful for the survey?*

Answer: Please do not generate a cost estimate for this survey. Only pre-existing and independent documentation may be used to justify a project cost. Cost estimates should include the total cost of the project including design, materials, site work, equipment costs, and contingencies. Do not include unallowable costs such as interest accrued in a project cost or fees added to support the state’s DWSRF Program.
If cost estimates are not provided, costs will be modeled from data obtained from the survey. In order to model costs, the appropriate design parameters (such as the capacity of a tank or the length and diameter of pipe) must be included.

**Question:** Are there any projects for which I must include a cost estimate?

**Answer:** Yes, we cannot model costs for the following:
- Off-stream raw water storage
- Projects coded as “other” types of treatment (T46) or “other” types of infrastructure needs (W10)

**Question:** Some of our projects have documentation of need or cost from several years ago. How old can the documentation for a project be in order to be valid for the survey?

**Answer:** The survey strives to use the most recent documentation available for every project. The following policies apply to documentation of need and documentation of cost:
- **Documentation of need** may not be more than 4 years old (prior to January 1, 2011) unless it is supplemented with a signed statement that the project is still needed, is within the original scope, and has not begun construction as of January 1, 2015. The independent document and the project validation statement would both be submitted with the completed survey. If you participated in the 2011 DWINSAs and you would be relying on independent documentation submitted for that survey you only need to submit the validation statement.
- **Documentation of cost** may not be more than 10 years old (prior to January 1, 2005). If the cost document is too old, be sure to provide the modeling parameters so the project cost can be modeled.

**Question:** My system participated in the 2011 DWINSAs. What do I need to do for the 2015 DWINSAs?

**Answer:** The 2015 DWINSAs will rely on updating the information used for the 2011 effort. A copy of the projects included for your system in the 2011 DWINSAs will be provided as a starting-point for your review. Updating the information will include:
- Deleting all projects that began construction prior to January 1, 2015 or are no longer needed.
- Updating the information for any projects that still apply to the 20-year period of January 1, 2015 through December 31, 2034, such as the number of meters to be replaced.
- Adding any new projects that are applicable to your system and deleting or revising any projects that overlap this new addition. Examples include deleting a project to rehabilitate a storage tank if that tank is to be taken out of service after installing a new tank.
- Providing documentation applicable for the type of project, including survey generated validation statements of need for projects included in 2011 and retained or modified for 2015.
ADDITIONAL ISSUES

**Question:** How will the data in the inventory tables on the questionnaire be used?

**Answer:** The inventory tables do not need to be completed for participation in the survey. The purpose of the inventory tables is to help you identify potential projects. By thinking through and listing your infrastructure inventory, EPA hopes you will be prompted to consider projects for all of the main components of your system. They are intended to help you recognize projects that may not have been included in your current budget or planning documents.

An exception to this policy applies if you use survey-generated documentation for projects to rehabilitate or replace pipe. In that case, you must provide the total miles (or feet) of pipe in your system in the inventory tables.

**Question:** Our distribution system is in poor condition. How much of our pipe should I include to replace or rehabilitate?

**Answer:** EPA understands that pipe rehabilitation and replacement needs may not be completely addressed by existing planning documents. EPA suggests including all pipe rehabilitation or replacement projects that are independently documented and determining what percentage of your pipe those projects represent. If you believe those documents do not adequately capture your pipe needs and they represent less than 10 percent of your total pipe inventory, you can add projects to bring your pipe replacement or rehabilitation up to 10 percent of your total pipe inventory using survey-generated documentation. Alternatively, you can include up to 10 percent of your pipe inventory with only survey generated documentation of need. Also, make sure you provide an estimate of your total miles (or feet) of pipe on the inventory table.

**Question:** If my project is included in the survey, does it mean my system is more likely to receive SRF funding?

**Answer:** Not necessarily. This survey is not an application for funding, but it does influence the amount of money your state will receive. This survey collects information that is used to help determine the percentage of appropriated DWSRF money to be given to each state. It also informs Congress of the total drinking water infrastructure need nationwide.

**Question:** What if I don’t plan to apply for SRF funding?

**Answer:** Your participation is still important! Whether your system ever applies for DWSRF funding or not should not affect your participation in this survey. Your participation will help determine the amount of money your state will receive by showing the amount of capital need for systems that are similar to yours in your state.

For more information about the Assessment and its policies, please see the 2015 DWINSA Reference Manual at [www.dwneeds.com](http://www.dwneeds.com), or contact the EPA Contractor at 406-443-9194.