

GA EPD

CAP GUIDANCE



WHAT IS A CAP?



A CAP (Corrective Action Plan) is a plan created by a Water System detailing specific actions to be taken to return to compliance for a specific violation. These plans are requested through Notice of Violations (NOVs) and should be submitted to the Drinking Water Compliance Unit. CAPs are separate from the Public Notice and should be submitted to EPD in a letter format. Once a CAP is approved, quarterly updates regarding the progress of the CAP must be submitted.

DEVELOPING A CAP



When developing a CAP, it is important to use SMART Goals. SMART goals are

Specific, Measurable, Achievable, Realistic, and Timely.

A CAP should include, but not be limited to, identifying the cause of the violations, corrective actions taken or to be taken to correct these violations, and plans to ensure they do not recur. This plan must be submitted according to the deadline set forth by EPD (usually within 30 days of the violations being issued) and must be approved by the Drinking Water Compliance Unit Engineer.

The following items must be included in a CAP:

- **A date by which the system expects to return to compliance.**
- **Specific actions to be taken, with a construction schedule provided.**
- **A date by which a revised CAP will be submitted to EPD if quantifiable results are not achieved by the original CAP.**
- **If a CAP includes a flushing plan, specific details on the frequency of the flushing plan should be included.**

Please note: Any treatment modifications must be approved by either the EPD Permitting and Engineering Team for surface water systems or the appropriate EPD District Engineer for ground water systems **prior to construction or installation**. Receiving CAP approval does not equate to receiving Plan Approval for any treatment modifications. If installing treatment, please contact the appropriate engineering unit to discuss obtaining Plan Approval.

CORRECTIVE ACTION PLAN EXAMPLE

January 1, 2024

Ms. Jennifer Morson, Engineer
GA EPD, Drinking Water Compliance Unit
2 Martin Luther King Jr. Dr. SE
Suite 1052 East
Atlanta, GA 30334

RE: **Corrective Action Plan**
Georgia Water System (WSID# 0000001)
Dougherty County, Georgia

Dear Ms. Morson:

In response to the NOV sent to the Georgia Water System on December 28, 2023, the following Corrective Action Plan and schedule has been developed to address and achieve compliance with the Stage 2 Disinfectants and Disinfection Byproducts Rule (2 DBPR).

In order to meet the requirements of the NOV and achieve compliance with the 2 DBPR, the system proposes: the addition of a new source well to blend with the current supply well, installation of auto-flushers, and a flushing plan. Below is a proposed time schedule for the completion of this project. Plans and Specifications for the new supply well and auto-flushers will be submitted to the SW District Office for review and approval March 1, 2024. The expected completion date of this project is November 1, 2024. In the meantime, the system will utilize a flushing plan to reduce the age of the water. We will flush at 10 locations in the system near dead ends, for 3 hours, twice a week. We expect to return to compliance by December 30, 2024. If we do not return to compliance by December 30, 2024, a revised CAP will be submitted to EPD by January 14, 2025. Updates regarding implementation of this CAP will be submitted to EPD quarterly.

Project Goal	Date
Submittal of Design	March 1, 2024
Open Construction Bids and Award Contract post EPD Approval of Plans	April 20, 2024
Begin Construction	May 20, 2024
Construction Complete	December 30, 2024

Please let me know if you have any questions on this CAP.

Sincerely,

Water System Official

Water System Official

Georgia Water System

cc: GA EPD Southwest District Office

*Please note: This is simply an example of a corrective action plan. The actions detailed in this example CAP are not to be used as a flushing plan that may be effective for your system.

CORRECTIVE ACTION PLAN TEMPLATE

Date: _____

WSID#: _____

Violation Type (Specific Contaminant): _____

Short Term Solution Actions*:

*If Short Term Solution includes flushing, you must include frequency, number of locations, and any other pertinent details.

Short Term Solution Implementation and Completion Dates: _____

Long-Term Solution Actions:

Long Term Solution Dates*:

Project Goal	Date Completed

*Table should include items such as submitting plans and specifications, securing funding for the project, construction timelines, etc.

Date by which a revised CAP will be submitted if desired results are not achieved: _____

Please attach any additional information relevant to the Corrective Action Plan.

Water System Official Signature: _____

Date: _____

*Please note: This template can serve as your Corrective Action Plan. Each applicable field must be completed. Please submit to the DW Compliance Unit Engineer.