

Mandatory Reporting of Contaminant Releases and Equipment Failures and Malfunctions FAQs

Last Revised: April 24, 2026

General FAQs

- **When does the reporting change go into effect?** The new reporting law went into effect on July 1, 2025.
- **What number do I call to make the report within two hours?** Call 1-866-531-3068.
- **Does the 2-hour reporting requirement apply to my waterworks?** Yes, the 2-hour reporting requirement applies to ALL Virginia waterworks. This includes community, nontransient noncommunity and transient noncommunity waterworks. A listing of Virginia waterworks can be found here: <https://www.vdh.virginia.gov/drinking-water/information-for-consumers/listing-of-waterworks-and-owners/>
- **What information should I provide when I call 1-866-531-3068 to make a report?** State you are reporting a drinking water emergency. Provide your name, telephone number, the name of the waterworks and the PWSID, the locality where the waterworks is located, and a short description of the situation.
- **What happens after I make a report within two hours?** The Office of Drinking Water (ODW) will return your call, if necessary, to gather more information, and to determine what additional technical assistance, regulatory support, or emergency response planning might be needed. If the 2-hour report was not necessary, or the issue reported is resolved or will be soon, and based on the situation description, then ODW will likely not return your call after normal business hours. ODW will follow-up during normal business hours the next day. ODW can contact local, state, and regional partners as necessary to help with response needs, if any.
- **Does it hurt to over report?** Please exercise professional judgment and only report when required. Reports within two hours should be rare. Submitting unnecessary reports causes extra and unneeded effort, especially after-hours reports. Submitting unnecessary reports drives up costs for the reporting services and diverts ODW away from other important needs.
- **When will I hear back from ODW after I make a report within two hours?** ODW will assess the information reported to the call center and determine next steps. You met your statutory obligation to report by making the report to the Call Center. A response from ODW is not necessary to complete the statutory reporting obligation. If the 2-hour report was not necessary, or the issue reported is resolved or will be soon, and based on the situation description, then ODW will likely not return your call after normal business hours. ODW will follow-up during normal business hours the next day.
- **What happens if I fail to report in a timely manner?** Failing to timely report will not usually result in an enforcement action. If the failure to timely report is associated with another regulatory violation, however, then the failure to timely report might be included in a Notice of Alleged Violation, with a request for appropriate corrective actions.

Enforcement is discretionary, fact-dependent, and considered on a case-by-case basis. Each situation will determine what action, if any, ODW takes if a waterworks owner fails to timely report an event requiring a 2-hour report. ODW expects that an enforcement action would likely be tied to an underlying failure to comply with the Waterworks Regulations and not solely due to a failure to make a 2-hour report.

- **Who should I speak with if I have additional questions not addressed in the FAQs?** Reach out to the field office for your waterworks - [Contact Us – Drinking Water](#)
- **Is the information that I provide for the 2-hour reporting event subject to the Freedom of Information Act (FOIA)?** Yes.
- **Should the 2-hour reporting requirement be added to a waterworks' Emergency Response Plan?** Yes.

Technical FAQs

- **How does the statutory reporting requirement affect a Quarterly Report for a waterworks that is not required to submit a monthly operating report?** While the 2-hour reporting requirement applies to all Virginia waterworks, only waterworks that are required to submit a Monthly Operating Report (MOR) each month are required to report on noncritical equipment failures or malfunctions.
- **What is the reporting requirement if the main power source for a waterworks fails but a back-up power source allows the waterworks to continue operations?** A 2-hour report is not necessary if back-up power sustains normal, uninterrupted service to customers. If there is no significant potential for serious adverse health effects due to short-term exposure or widespread disruption of water service, then a 2-hour report is not necessary. If a 2-hour report is not required but the failed power source remains out of service, then the failure of the main power source must be reported in that month's MOR due to the threat to service continuity.
- **What are the reporting requirements if a booster pump station with two pumps has one pump fail?** A 2-hour report is not necessary if the second pump sustains normal, uninterrupted service to customers.
 - If the waterworks determines that it is reasonably foreseeable that the booster pump station, including pressure zone storage, can meet the demand so there is no widespread outage, then it is not a critical equipment failure and there is no 2-hour reporting requirement.
 - If the failed pump remains out of service until the Monthly Operating Report (MOR) deadline of the 10th day of the following month, and if the noncritical equipment failure or malfunction could adversely affect water quality, public health or service continuity, then report it in the MOR.
 - If the waterworks determines that the booster pump station, including pressure zone storage, is not likely to meet the demand with a potential for a widespread outage, then it would be a critical equipment failure and a 2-hour report is required.

- **Please provide examples of specific impacts to an institution, etc.** If an outage affects a congregate care living facility (for example, a hospital, long-term care facility, correctional center, or prison), it is considered a “widespread disruption of water service.”
- **What is an objectionable substance?** “Objectionable substance,” is associated with taste or odor. Apply appropriate professional judgment to determine whether a 2-hour report is necessary. “Chemical contaminant” does not mean that the substance poses a health risk or concern.
- **Is reporting required if a waterworks with four wells only uses two of the wells and one of those wells fails?** A 2-hour report is not necessary if the waterworks maintains normal, uninterrupted service to customers. If the waterworks identifies the well failure before a widespread disruption of water service and places another well into service to avoid a widespread disruption of service, then 2-hour reporting is not triggered. If the well remains out of service due to the failure beyond the Monthly Operational Report (MOR) deadline of the 10th day of the following month, and if the noncritical equipment failure or malfunction could adversely affect water quality, public health or service continuity, then it must be reported in the MOR. In this case, the waterworks owner would evaluate the capacity of the remaining wells in service and compare it to the expected water demand, considering system storage capacity to determine if service continuity may be impacted.
- **Does the 2-hour window start when a pipe break occurs or when the Boil Water Advisory is issued?** The two-hour window starts upon waterworks personnel discovering that the contaminant release or critical equipment failure or malfunction requires reporting. In the case of a water main break, this would occur when the requirement for a boil water advisory is triggered. See this link for more information about types of water main breaks: [Boil Water Information for Utilities - Drinking Water](#)
- **Is “discovery” considered to be a SCADA notification or is discovery considered to occur when the event is confirmed from field observations?** Discovery is when the waterworks staff knows there is a problem or issue that is reasonably foreseeable to cause a widespread loss of service. Waterworks staff does not need to confirm the event from direct field observations. For example, multiple consumer reports of no service could be considered “discovery.”
- **Is there a 2-hour reporting requirement for loss of use of SCADA?**
 - 2-hour reporting is required if the waterworks can reasonably foresee the loss of use of SCADA is likely to cause a widespread disruption of water service or a contamination event.
 - 2-hour reporting is not required if the loss of use of SCADA will not cause a widespread disruption of water service or contamination. For example, waterworks staff, upon loss of use of SCADA, implement the waterworks’ emergency response plan, such that waterworks staff will routinely and adequately monitor elevated tank levels and other critical equipment through visual identification without the benefit of SCADA. In such case, the successful implementation of the waterworks’ emergency response plan will not cause a widespread disruption of service despite the loss of the use of SCADA.

- If the loss of use of SCADA is a noncritical equipment failure or malfunction and persists beyond the MOR deadline of the 10th day of the following month, and if the noncritical equipment failure or malfunction could adversely affect water quality, public health or service continuity, it must be reported in the MOR.
- **If a chemical feed pump fails and a backup pump is placed in service, what is the requirement?**
 - 2-hour reporting is not required, provided the problem does not create a significant potential for serious adverse effects on human health as a result of short-term exposure. For example, loss of chlorine feed at a surface water treatment plant for 15 minutes would not trigger 2-hour reporting. This is a noncritical failure.
 - If the failed chemical feed pump is a noncritical failure and is not returned to service by the MOR deadline, and if the noncritical equipment failure or malfunction could adversely affect water quality, public health or service continuity, it must be reported in the MOR.
- **If a waterworks becomes aware of a severe leak because tank levels are dropping but hasn't located the leak, when is the "discovery" and when is the 2-hour reporting due?** The "discovery" occurs when the waterworks realizes a reasonably foreseeable widespread disruption of water service is evident. The waterworks does not need to identify the actual leak location or cause of the problem.
- **Is 2-hour reporting required for TNC systems that can close?** Closing the business does not change the requirement for a 2-hour report. Any contamination event must be reported within two hours. For a critical equipment failure, please see the definition of widespread disruption of service below. If the event meets the definition of widespread disruption of service, a 2-hour report is required. If it does not meet the definition of widespread disruption of service, please see ODW's Boil Water Advisory (BWA) and main break guidance for notification to ODW.
- **Is 2-hour reporting required when a seasonal waterworks closes for the season?** No. A seasonal waterworks that closes at the end of the operating season should notify the appropriate field office of the shut down and when the waterworks will start a new season.
- **Is 2-hour reporting required if a TNC waterworks closes for a short time from depressurization, for example, over the weekend?** Please see the definition of widespread disruption of service. If the event meets the definition of widespread disruption of service, then a 2-hour report is required. If the event does not meet the definition of widespread disruption of service, then please review ODW's BWA and main break guidance for notification to ODW.
- **What is the requirement if there is a line break that requires a controlled shutdown of over 50 service connections?**
 - Review ODW's policy on water main break types (chlorinated) at [ODW Guidance on Main Breaks and Responses - Permanent Chlorination](#). Type III and Type IV breaks require boil water advisories in most cases.

- See the question immediately below for more information related to the threshold for widespread disruptions of service.
- **Please summarize the service line criteria for “widespread disruption of water service”.** A “widespread disruption of water service” is a loss of water service to: (1) 500 or more service connections for waterworks with 5,000 or more service connections; (2) 10% or more of the waterworks’ service connections for waterworks with 500 to 4,999 service connections; (3) 50 or more service connections for waterworks with fewer than 500 service connections; (4) a congregate care living facility (for example, a hospital, long-term care facility, correctional center, or prison); or (5) one or more connections provided by a wholesale waterworks unless the wholesale waterworks owner knows that the loss of water service to a consecutive waterworks will not result in a loss meeting any of the conditions established in (1) through (4). A “loss of water service” means no flow or low flow at the customer’s tap caused by no or low pressure in the water distribution system. As a reminder, a water service outage due to planned removal from service, repair, or maintenance of equipment is not an equipment failure and does not need to be reported.

Except for items (4) and (5) in the above paragraph, ODW does not consider a disruption of water service to 49 or fewer connections to be a “widespread disruption of water service” requiring reporting within two hours; however, an owner would still have a duty to report a low or no pressure event within the distribution system to ODW within 24 hours pursuant to 12VAC5-590-570.B of the Waterworks Regulations.

- **What if there is a failure, but adequate water can be provided from another provider? For example, a surface water treatment plant is shut down due to an equipment failure and wells cannot satisfy all water needs, but the waterworks can obtain sufficient water through a consecutive connection.** A 2-hour report is not necessary when normal, uninterrupted service to customers is maintained. In this case there is no widespread disruption of service and 2-hour reporting is not required. If the failure extends beyond the MOR deadline, then it must be reported in the MOR.
- **Does the law establish a new requirement for pressure testing during a water main break?** No, the law establishes requirements for reporting critical equipment failures or malfunctions. Waterworks must conduct pressure testing as necessary to identify critical equipment failures or malfunctions.
- **If there is a loss of water affecting only a few connections but one is a small long-term care facility, does that still classify as “widespread”?** Yes, a long-term care facility such as a nursing home or assisted living facility is a congregate care living facility and the loss of water event is defined as a widespread disruption of water service.
- **If one service connection affecting more than 50 residents (example, apartment complex or mobile home park) experiences a loss of service, does this trigger the 2-hour reporting requirement?** Waterworks owners are to use their best judgement in instances where multiple residences are served by singular connections. Refer to the widespread disruption definition guidance to make this assessment.

- **If a waterworks purchases water from a wholesale utility and the wholesale utility has a major issue, are both utilities required to report?** The primary or wholesale waterworks is required to report. If the problem will cascade to the secondary or purchasing waterworks, then the secondary or purchasing waterworks must report too; unless the wholesale waterworks has already communicated the issue to the consecutive connection(s) and relayed that communication to ODW.
- **Is reporting required if power is lost for a couple hours at a public school that operates on well and septic?** Maybe. The waterworks must report if a widespread disruption of water service is reasonably foreseeable based on anticipated demand and water storage. For example:
 - If power is lost, it is likely that most staff and students would be sent home. If waterworks personnel estimate that the water remaining in pressure storage is sufficient to maintain system pressure until power is restored, then no 2-hour report is required.
 - If power is lost, but pressure storage is insufficient to maintain pressure with the remaining staff and students in the building, then a 2-hour reporting is triggered.
- **What is an example of a backflow event that is considered a contaminant release and what is an example of a backflow event that is not considered a contaminant release?**
 - If a backflow event flows into the waterworks, 2-hour reporting is triggered.
 - If a backflow event flows into premise plumbing, but does not reach the waterworks system, 2-hour reporting is not triggered.

Procedural FAQs

- **Who can report an incident? Must the Operator in Responsible Charge report?** Any waterworks representative can report a drinking water emergency. The waterworks owner is responsible for meeting the reporting requirement.
- **Will the waterworks receive an acknowledgement of receipt of report for 2-hour reporting if they contact the VDH Call Center?** ODW will return your call, if necessary, to gather more information, and to determine what additional technical assistance, regulatory support, or emergency response planning might be needed. If the 2-hour report was not necessary, or the issue reported is resolved or will be soon, and based on the situation description, then ODW will likely not return your call after normal business hours. ODW will follow-up during normal business hours the next day.
- **After the 2-hour report is made, should waterworks also report in detail how the issue was fixed?** Yes. The waterworks should stay in contact with its ODW field office during the period of discovery through recovery.
- **Will a live person be available 24/7 to answer the phone or will it be a computer-generated response?** Yes. The VDH Call Center (1-866-531-3068) connects to a live person 24/7.
- **What if the system is overwhelmed with reporting and no one can get through and be marked as "reported"? What happens to the 2-hour window to report if calls can't get through?** The VDH Call Center will have someone available 24/7/365 to take

a live report. Please report delays or an inability to report directly to the field office. See [Contact Us - Drinking Water](#).

- **After a report is made, who will ODW call back?** ODW will call back the person and number provided from the 2-hour report.
- **What happens if ODW does not call back?** ODW will assess the information reported to the VDH Call Center and respond accordingly, which may be the next business day. Waterworks should only reengage the VDH Call Center if the situation has changed and warrants an update regarding further impacts on public health and/or the widespread disruption.

Enforcement FAQs

- **Please clarify the language on the start of the 2-hour window.** Discovery of the reportable event occurs when waterworks personnel have determined that a “contaminant release” or “critical equipment failure or malfunction” has occurred that requires reporting within two hours. Waterworks personnel should use diligence and sound judgment when determining whether a reportable event has occurred.
- **Will these reports be published, available to the public, or subject to FOIA?** Depending on the value of the information, ODW may decide to share information about 2-hour reports to improve future reporting. At this time, no decision has been made on what will be shared on VDH’s website about reports submitted within two hours. The reports will be subject to FOIA.
- **Any punitive damages or fines anticipated?** Each situation will determine what action, if any, ODW takes if a waterworks owner fails to timely report an event requiring a 2-hour report. ODW expects that an enforcement action resulting in a civil penalty would likely be tied to an underlying failure to comply with the Waterworks Regulations and not solely due to a failure to make a 2-hour report.

Monthly Operating Report (MOR) FAQs

- **Are monthly operating reports now required to be submitted with an online form?** Yes.
- **Will waterworks receive an e-mail confirmation once the MOR has been submitted?** Yes, the person inputting the MOR in REDCAP will be prompted with the option to enter their email address to receive a confirmation email.
- **When will electronic MOR submissions start?** Begin using the new REDcap MOR submittal method for the July 2025 MOR between August 1, 2025, and August 10, 2025.
- **Can waterworks send their MORs to their field office?** Beginning with the July 2025 MOR on August 1, 2025, MORs must be submitted through the online form. VDH will not send email confirmation, but field staff will be able to sign into REDcap to download all reports.
- **Is there a MOR template available?** Yes. Reach out to your field office to obtain an MOR template.

- **When will instructions be sent about MOR online reporting?** Instructions are in the slides for the June 17, 2025, webinar located [here](#).
- **Is the new MOR reporting located at the Global Environmental Consulting (GEC) website?** No. VDH will share a link on the ODW website to the reporting form to waterworks on or before August 1, 2025. Additionally, VDH will send an email message on the first day of each month to the designated operator contact for each waterworks required to submit an MOR. This message will include a link to the reporting form.
- **Is the MOR reporting beginning August 1st for normal operation or just for an equipment failure or equipment malfunction?** The new MOR reporting covers the normal Monthly Operating Report in addition to the reporting of non-critical equipment failures and malfunctions.
- **We have 25 groundwater systems that we submit monthly reports for. Will there be a way to submit multiple MORs at once or will these need to be submitted individually?** No, each waterworks MOR must be submitted individually.
- **Will VDH ODW provide additional training, demonstrations, and a step-by-step job aid on how to use the new MOR reporting form, and how to report a noncritical equipment failure or malfunction?** A demonstration and training on the MOR reporting form is included in the recording of the June 17, 2025, webinar starting at approximately 36:30 located [here](#). Instructions are included in the webinar slides located [here](#).