

Mandatory Reporting of Contaminant Releases and Equipment Failures and Malfunctions FAQs

Last Revised: July 2, 2025

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, gather more information, and determine what additional technical assistance, regulatory support, or emergency response planning might be needed. ODW will contact local, state, and regional partners as necessary to help with response needs, if any.
- **When will I hear back from ODW after I make a report within two hours?** ODW will call you back as soon as possible.
- **What happens if I fail to report in a timely manner?** ODW will review the facts and circumstances to determine next steps. Each situation will be fact dependent when it comes to the appropriate next steps and needs.
- **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.
- **In the event the waterworks owner is unsure if an event triggers a reporting requirement, what should they do?** Completing the 2-hour report is recommended whenever the waterworks is unsure if a report is required.

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?** 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?**
 - 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 it must be reported 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 is a critical equipment failure and there is a 2-hour reporting requirement.
- **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," meaning producing an unusual or unpleasant taste or odor, is sufficient to qualify as a "chemical contaminant." Whether a chemical contaminant is "objectionable" is somewhat subjective and waterworks personnel will need to apply their professional judgment to determine whether the standard is met under the totality of the circumstances.
- **Is reporting required if a waterworks with four wells only uses two of the wells and one of those wells fails?** 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 from their investigation 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.
- **Is discovery a SCADA notification or confirmation in the field?** Discovery is when you know you have a problem reasonably foreseeable to cause a widespread loss of service. You do not need to have specifically confirmed it by field observations. For example, if you receive multiple consumer reports of no service, this could be considered discovery.
- **Is there a timeframe on loss of communications to SCADA?** With loss of SCADA communications:
 - 2-hour reporting is required if the waterworks can reasonably foresee the event is likely to cause a widespread disruption of water service or a contamination event.
 - 2-hour reporting is not required if it will not cause a widespread disruption of water service or contamination.
 - Note that for some systems, loss of SCADA communications means that the system will not operate, meaning that intervention is needed for a prolonged outage to avoid loss of water service.
 - If the loss of SCADA communications 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 tanks 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. The 2-hour reporting is due

after an investigation concludes and the waterworks determines that a notice within 2-hours is required by law.

- **Is the 2-hour reporting required for TNC systems that can close?** If a TNC experiences a complete loss of service, then reporting is required, even if the business can close during the outage. Closing the business does not change the requirement for a 2-hour report.
- **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 restart a new season.
- **Is 2-hour reporting required if a TNC waterworks closes for a short time from depressurization, for example, over the weekend?** If a TNC waterworks depressurizes while closed because of a critical equipment failure or malfunction, then 2-hour reporting is required.
- **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”.**

Waterworks Total Number of Service Connections	Criteria for widespread disruption of water service
5,000 or more connections	500 or more service connections
500 to 4,999 connections	10% of waterworks' service connections
Fewer than 500 connections	50 or more service connections

- **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.** 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 this new law establish a new requirement for pressure testing during a water main break?** No, the new law establishes requirements for reporting critical equipment failures or malfunctions. Waterworks will need to conduct pressure testing to the extent needed 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 event should be considered 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?** No, because widespread disruption of water service considers the number of service connections and not numbers of persons or residents, and an apartment complex or mobile home park is not a congregate living facility.
- **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, but if the problem will cascade to the secondary or purchasing waterworks, then the secondary or purchasing waterworks should report too. Reporting by the secondary or purchasing waterworks confirms to VDH that the waterworks is aware of the event and expected consequences.
- **Is reporting required if power is lost for a couple hours at a public school that operates on well and septic?** The waterworks needs to evaluate if a widespread disruption of water service is reasonably foreseeable based on anticipated demand and water storage. For example:
 - If power is lost, most likely, most staff and students would be sent home. Waterworks estimates that water remaining in pressure storage is sufficient to maintain system pressure until power is restored, and 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, 2-hour reporting is triggered.
- **What are some examples of backflow events that are considered contaminant releases and which are not?**
 - 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 call to 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?** No. The ODW representative will call the waterworks back, which will confirm receipt of the two-hour report.

- **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?** If you utilize the preferred method of calling the VDH Call Center at 1-866-531-3068 then you will be connected 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 preferred reporting method via the VDH Call Center will have someone available 24/7/365 to take a live report.
- **After a report is made, who will ODW call back?** ODW will call back the person and number provided initially. For the preferred method you can also speak to the operator and provide an alternative phone number if needed.
- **What happens if ODW does not call back?** If ODW does not call back within 2 hours you may call the Call Center back and ask for a status on your call. These situations should not occur regularly but are possible. You will not be penalized when ODW reviews the call log and sees the initial report was made within the 2-hour reporting requirements.

Enforcement FAQs

- **Clarify the language on the start of the 2-hour window.** Discovery of the reportable event occurs when waterworks personnel have investigated a situation and 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.
- **Does it hurt to over report?** ODW expects waterworks to exercise professional judgment and to only report when required. Reports within two hours should be rare situations and not normal experiences. Submitting unnecessary reports will cause extra and unneeded effort, diverting technical staff's attention away from other important needs.

Monthly Operational 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?** No; however, you will see a confirmation message on your browser after submitting the MOR.
- **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 will be required to 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 Operational 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](#).