

Paula Wilson

From: PICKEL, TERRY <TPICKEL@cdaid.org>
Sent: Monday, May 21, 2012 11:58 AM
To: Paula Wilson
Cc: MARKLEY, JIM; SCHREMPP, GREG; NOLAN, GARY
Subject: Draft Rulemaking Public Comments.

Good morning Paula,

Below are my suggested changes to the draft Rule highlighted in yellow.

Explanation:

- In Section 002.01, the “Incorporation by Reference” of the cross connection control manuals would resolve a few outstanding issues with testing and tester conduct.
- I noticed a disparity in the notification periods between Sections 302.03 and 303.04. I believe for consistency, the response period for both sections should be identical to avoid confusion.
- In Section 543.03, I added some additional language to clarify all applications of this requirement.
- In Section 552.01.ii.1, the water supplier typically would notify the affected customers as per their Department approved standard operating procedures of the unplanned or emergency situation, the anticipated time of repairs/replacement and suggest an adequate period of non-consumption to allow for an anticipated sampling period. Re-notifying the customers that the water is safe for consumption would take significant resources from other projects and routine maintenance for no plausible reason and considerable expense. Obviously the supplier would re-notify if the supply is unsafe or there were other valid concerns.
- In Section 552.06.e, after further consultation with other water suppliers and testers, I am proposing some language modification to extend the reporting period by an additional 5 business days (to a 10 business day maximum) while allowing some flexibility to the water suppliers to set their own standards. This should allow sufficient time for ordering parts/replacements, repairs and retesting. It should also tend to resolve problems with testers holding reports as leverage against the customers contrary to the water supplier’s need for immediate notification.

002.INCORPORATION BY REFERENCE AND AVAILABILITY OF REFERENCED MATERIALS.

01. Incorporation by Reference. The following documents are incorporated by reference into these rules. (4-11-06)

a. 40 CFR Parts 141, revised as of July 1, 2011, and 40 CFR Part 143, revised as of July 1, 2011. Any reference in these rules to requirements, procedures, or specific forms contained in any section or subsection of 40 CFR Parts 141 and 143 shall constitute the full adoption by reference of that section or subsection, including any notes and appendices therein, unless expressly provided otherwise in these rules (4-11-06)()

b. American Water Works Association (AWWA) Standards, effective December 2009, available for a fee from the AWWA, 6666 West Quincy Avenue, Denver, Colorado 80235, Telephone (800) 926-7337, <http://apps.awwa.org/ebusmain/OnlineStore.aspx>. (4-7-11)

c. Cross Connection Control Manual, available from Pacific Northwest Section of the American Water Works Association, P.O. Box 19581, Portland, OR, 97280-0581, Telephone (503) 246-5845. (3-30-07)

d. Manual of Cross-Connection Control, Foundation for Cross-Connection Control and Hydraulic Research, University of Southern California, KAP-200 University Park MC-2531, Los Angeles, CA 90089-2531, (866)545-6340, [otify if the](#). (3-30-07)

Delete similar paragraphs n. and o. under "Section 002.02 Availability of Reference Materials". (if utilized under Section 002.01)

302.SANITARY SURVEYS FOR SYSTEMS USING SURFACE WATER OR GROUND WATER UNDER THE DIRECT INFLUENCE OF SURFACE WATER.

The Department shall conduct a sanitary survey of all public water systems which use surface water or ground water under the direct influence of surface water. (4-5-00)

03.Response Required. The owner of a public water system must respond in writing, describing how and on what schedule the system will address all significant deficiencies, not later than forty-five (45) days after receiving notification from the Department.

303.SANITARY SURVEYS FOR PUBLIC WATER SYSTEMS USING GROUND WATER.

The Department shall conduct a sanitary survey of all public water systems that use ground water. 40 CFR Part 141, Subpart S, is herein incorporated by reference. (5-8-09)()

04.Response Required. The owner of a public water system must respond in writing, describing how and on what schedule the system will address all significant deficiencies, not later than ~~thirty (30)~~ forty-five (45) days after receiving notification from the Department.

543.FACILITY AND DESIGN STANDARDS: CROSS CONNECTION CONTROL.

03. Replacement Parts and Components. All replacement parts and components, including resilient seated shutoff valves, shall meet original manufacturer's specifications or otherwise be approved by the USC Foundation as replacement parts or components for use on double check valve backflow prevention assemblies, reduced pressure principle backflow prevention assemblies, and pressure vacuum breakers, spill resistant pressure vacuum breakers and vacuum breakers. The design, material, or operational characteristics of any assembly must not be altered during maintenance or repair. (4-7-11)

~~552.FACILITY AND DESIGN STANDARDS:~~ OPERATING CRITERIA FOR PUBLIC WATER SYSTEMS.

01. Quantity and Pressure Requirements. Design requirements regarding pressure analysis are found in Section 542.13.

ii. **Public Notification.**

(1) During unplanned or emergency situations, Wwhen water pressures within the system are is known to have fallen below twenty (20) psi, the water system supplier must notify the Department, provide public notice to the affected customers within twenty-four (24) hours, and disinfect the system. When sampling and corrective procedures have been conducted and after determination by the Department that the supply is safe the water

supplier shall notify the Department that the supply is safe for consumption. The water supplier shall re-notify the affected customers ~~that only~~ if the supply is ~~determined not to be~~ safe for consumption. (4-7-11)

06. Cross Connection Control Program - Community Water Systems.

e. Assemblies that cannot pass annual tests or those found to be defective shall be repaired, replaced, or isolated within ~~five (5) business days~~ a specified period defined by or acceptable to the purveyor, in no case exceeding ten (10) business days. If the failed assembly cannot be repaired, replaced, or isolated within ~~five (5) business days~~ ten (10) business or less, water service to the failed assembly shall be discontinued.

Thanks,

Terry W. Pickel
Assistant Water Superintendent
City of Coeur d'Alene