



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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MEMORANDUM

TO: Kerby Cole, Lewiston Regional Office Administrator
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Doug Howard, Twin Falls Regional Office Administrator
Jim Johnston, Idaho Falls Regional Office Administrator
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FROM: *Barry 8/3/06*
Barry N. Burnell, Water Program Administrator

SUBJECT: **Rule Interpretation—Standby Power**

DATE: August 2, 2006

Proposal: The newly negotiated facility standards rule has provisions regarding standby power that fall within the rather broad range of interpretations that have been applied to the current drinking water rules, as discussed below. The new rule strikes a middle ground that was acceptable to negotiators and is protective of public health. **This memo proposes that, effective immediately, DEQ engineers performing plan and specification reviews for new public water systems use the framework agreed upon in the new rule until the new rule becomes final in the spring of 2007. This applies to standby power provisions only.**

Current Rule Interpretation: Although views on this issue have differed around the state, it seems clear that Recommended Standards for Water Works ("Ten States") requires that all water systems have storage sufficient to supply average day demand. Ten States also requires standby power sufficient to supply average day demand *plus fire flows where provided*, during a power outage. Storage requirements may be reduced if the system has enough pumping capacity with standby power *to supplement peak demands of the system*. The wording used here is unfortunate (i.e. "supplement"), which may help to explain differences in interpretation, but in the most literal reading, the standards require a combination of storage and standby power sufficient to supply peak demands during a power outage. DEQ has not traditionally held to the storage requirement, choosing instead to allow water systems to supply all of their needs via pumping. For systems that rely on pumping only, standby power must be sufficient to support peak day pumping demands.

New Proposed Facility Standards Rule: Negotiators felt that standby power supporting average day demand can eliminate most of the risk associated with power failures at considerably less cost than would be required if standby power must sustain peak demands. The new rule requires standby power sufficient to maintain distribution pressure standards and supply flow equal to *average day demand for a period of eight hours, including fire flow where provided*. If a system has elevated storage sufficient to meet this criterion, no standby power would be required. The rule also lists considerations that DEQ can take into account when evaluating proposals for less standby power (or none at all).

Summary: The approach proposed here lies within the broad range of interpretations available under the current rule, and lies in the middle ground. Standardizing around the provisions of the new rule will help to narrow the range of interpretation and lead to greater consistency around the state.

BNB:jt