

**Group A Public Water Supplies - Chapter 246-290 WAC
WSR 16-17-139
Public Hearing Testimony and Department of Health's Recommendations
October 12, 2016**

Name & Entity Represented	Summary of Comments	Department of Health's Recommendation
J.D. Wilson & Abdoul Gafour, City of Renton	Water System Planning - The City of Renton supports the rulemaking extending the planning period to ten years. Thanks to the department for excellent services, guidance documents. Extending the water system planning cycle to ten years will result in a cost savings. We'll be able to focus resources on other water system issues rather than on planning so often.	Adopt as proposed: The department appreciates the City of Renton's support of extending the water system planning period from 6 to 10 years.
Audrey Adams, Washington Action for Safe Water	Fluoridation: The FDA said sodium fluoride is not safe not, not effective, and not FDA approved. Water systems are using industrial grade products and they are not purified before using in drinking water. Other water systems are using fluorosilicic acid which is also is industrial grade, not purified, and not FDA approved. These products are corrosive to the pipes which leach lead and arsenic. Sodium fluoride additive is not safe for use and contains lead and other corrosive chemicals. The manufacturers of these products do not warrant the safety, effectiveness or use of these products. The rule does not require the safety of the products, this needs to change. EPA has not approved these products. The state should regulate these products. No agency warrants the safety of these products.	Adopt as proposed: In April, 2016 the State Board of Health adopted a rule to lower the optimal level of fluoride additive in drinking water for those systems that choose to fluoridate. To protect public health, WAC 246-290-220 requires additives for use in drinking water to comply with ANSI/NSF Standard 60 or 61 which fluoride additives must meet. This comment is not within the scope of this rulemaking.
Drew Noble, H2O Management Services	WAC 246-290-451 Volunteers taking chlorine residuals: The color wheel color comparator field test kit enables homeowners to measure chlorine residual simply and quickly. A digital colorimeter field test kit requires several additional steps. Homeowners who volunteer to take daily chlorine residual samples have little time and attention for taking residuals. Requiring use of a digital meter could result in the volunteer skipping daily readings, or using the result from the	Adopt as proposed: The department does not recommend making any changes. The rule currently requires systems use an EPA approved method such as the digital colorimeter. The color wheel and test strips are not EPA approved methods. Current practice allows operators, or non-operators designated by the operator to measure and record chlorine residual tests, to use a color wheel for all types of chlorine tests. The rule change maintains the

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	<p>day before. The alternative, sending an operator to do the daily chlorine residual test, would be cost prohibitive.</p> <p>WAC 246-290-451 Temporary disinfection versus remedial disinfection: The concern is over the cost of requiring a professional engineer (P.E.) to design disinfection treatment facilities when disinfection is needed only on a temporary basis. Remedial disinfection, intended to be operated permanently or at least long-term, should be designed by a P.E. Temporary disinfection may be used as a precautionary or interim measure for a relatively short period of time, such as when waiting for a new water tank to be installed to replace an old, unsanitary tank. Costs to a small water system to install temporary chlorination while waiting for a new reservoir to be installed is quite high. Why pay extra thousands of dollars for engineering and added monitoring? Some systems may choose to do the "glug method" (shock chlorination) to mask contamination. Also, the proposed regulation gives the department no discretion over the decision to require disinfection. There are often singular, minor problems at the root of contamination problems that can be fixed without the</p>	<p>requirement to use an EPA-approved method for measuring chlorine residual specifically when chlorine is added for the purpose of disinfecting a groundwater source known to be contaminated or considered at high risk for microbial contamination. EPA rules give states the option to include in their regulations an allowance to use the color wheel to measure free chlorine. With this rule change the use of a color wheel for measuring chlorine residual is specifically allowed, provided that chlorine is added only for the purpose of maintaining a detectable residual in the distribution system.</p> <p>Adopt as proposed: The department does not recommend making any changes. The requirement for design of disinfection treatment is governed by chapter 18.43 RCW, professional engineer statute. The requirement to install continuous disinfection in the current regulation is triggered by systems that have documented microbial contamination or documented microbial contamination threat to a groundwater source; and by repeated (multiple) instances of unresolved microbial contamination detected in the distribution system. The proposed rule adds detail to what is meant by microbial contaminant threat, adds desalination of seawater as a disinfection trigger, and applies terminology consistent with the Revised Total Coliform Rule. The basic structure of the rule remains unchanged: in the event source contamination is detected, the source is threatened by contamination, or the distribution system is found to be contaminated on multiple occasions, the rules obligate the</p>

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	need to install disinfection treatment.	water system to install continuous and effective disinfection as an added barrier against disease. If a system is required to provide continuous disinfection as a result of hitting any of the above, triggers the professional engineering requirement. The significant analysis under Table 2 – Simple disinfection included costs for engineering design. Our practice has been and will continue to allow qualified and experienced water utilities and SMAs to install disinfection on a short-term temporary basis to address a temporary condition without enforcing the professional engineering requirement.

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