

Clark County Public Health Group B Workgroup 2013

Group B Update - Rule Comparison Table

This table is intended to inform the Clark County Public Health, Group B workgroup of differences in relation to the 2014 Washington State Department of Health (DOH) code revision.

Current DOH Practice (Existing Group B Rule)	Clark County Role (Existing)	2014 Rule (Adopted 2014 Rule)	Options for Clark County Role
Group B System Definition: A system that serves fewer than 15 service connections ⁱ and <ul style="list-style-type: none"> • Fewer than 25 people per day; Or • Serves 25 or more people with fewer than 60 days per year. 	Consistent with DOH definition of Group B systems.	Changes to existing definition: <ul style="list-style-type: none"> • 1-2 connection systems have no requirements unless they serve a food service establishment; treatment facilityⁱⁱ, transient accommodation, licensed childcare (not a home provider – must be a care center). • 3-9 connection systems would follow new WAC requirements. • 10-14 residential connections must be reviewed by DOH and meet Group A design standards. • Residential connections are identified to serve 2.5 people. 	Be consistent or modify definition to include other criteria such as “Business”. For example: churches, grange halls, small business with workers, etc.
Flexible regulatory approach <ul style="list-style-type: none"> • Most design standards are in guidance, and engineering flexibility is commonly provided • Systems can use drilled wells, dug wells or springs with proper design provisions 	Operate under a Joint Plan of Responsibility (JPR) granted by DOH to review and approve Group B water systems. <ul style="list-style-type: none"> • Flexible regulatory approach allowed for system specific designs and approvals. • Sanitary Surveys of water systems ended 	Strict approval criteria for new/expanding systems: <ul style="list-style-type: none"> • Source must meet primary water quality standards without treatment - Arsenic standard reduce to 10 ppb • Source can only be a drilled well 	1) JPR without Local Ordinance: Operate under a Joint Plan of Responsibility (JPR) granted by DOH to review and approve Group B water systems <ul style="list-style-type: none"> • Approval must meet WAC requirements <u>OR</u>

<ul style="list-style-type: none"> Water quality treatment can be designed for systems that don't meet standards Arsenic standard is 50 ppb Expanding systems can submit simple design report showing capacity 	<p>in 2008 due to state funding cuts.</p>	<ul style="list-style-type: none"> Expanding systems must meet 2014 code revision No Waivers will be issued by DOH 	<p>2) JPR with Local Ordinance: Operate under a Joint Plan of Responsibility (JPR) granted by DOH to review and approve Group B water systems <u>with local ordinance</u></p> <ul style="list-style-type: none"> Waiver options available for source type, quality. Monitor, oversight, and primary enforcement processes must be in place. <p><u>OR</u></p> <p>3) Full DOH oversight: DOH reviews and approves/denies all water system proposals without local involvement.</p>
<p>DOH provides a database for</p> <ul style="list-style-type: none"> Updating system owner/connection changes and water quality results. Individual property connections are not identifiable. 	<ul style="list-style-type: none"> Maintains internal database of known water system locations. Provides DOH with owner/connection updates as system are approved or updated. Individual property connections are not identifiable. 	<p>DOH will create a record for a newly identified water system, but will not update system owner name or connection status afterward.</p>	<p>1) JPR without Local Ordinance:</p> <ul style="list-style-type: none"> Maintains internal database of known water system locations. Provides DOH with owner/connection updates as system are approved. Individual property connections are not identifiable. <p>2) JPR with Local Ordinance:</p> <ul style="list-style-type: none"> Database needs will be determined by local ordinance. Examples of tracked information includes: <ul style="list-style-type: none"> Systems with waivers. water quality O&M tracking enforcement needs <p>3) Full DOH oversight:</p> <ul style="list-style-type: none"> No CPH involvement.
<p>DOH can provide technical assistance to systems with water quality issues during the approval process.</p>	<p>Provides technical assistance to water systems during and after design approval.</p>	<p>DOH will refer operators to their website for assistance.</p>	<p>1) JPR without Local Ordinance:</p> <ul style="list-style-type: none"> refer operators to the DOH website for assistance <p>2) JPR with Local Ordinance:</p> <ul style="list-style-type: none"> Level of assistance determined by the

			<p>allocated resources granted by the local ordinance.</p> <p>3) Full DOH oversight:</p> <ul style="list-style-type: none"> No CCPH involvement.
Professional Engineer (P.E.) requirement for design submittals often did not apply.	Design workbooks often approved by our office without engineering.	All new and expanding systems must be prepared by a P.E.	<p>1) JPR without Local Ordinance:</p> <ul style="list-style-type: none"> All new and expanding systems must be prepared by a P.E. <p>2) JPR with Local Ordinance:</p> <ul style="list-style-type: none"> Local ordinance may allow the most common systems to be designed by someone other than a P.E. <p>3) Full DOH oversight:</p> <ul style="list-style-type: none"> All new and expanding systems must be prepared by a P.E.

NOTES:

ⁱ Hardships are considered connections.

ⁱⁱ Any facility permitted under WAC 246-337-001 or WAC 388-76; Supporting RCW's include 71.12, 71.05, 70.96A, 71.34.