

25-30 attendees  
~ 7-8 at HPHR  
~ 8-9 at Guidelines  
~ 5-6 at Comm & Ed  
~80% owners/operators

**Group B Forum Comments**  
**Spokane**  
**Ramada Inn**  
**September 9, 2008**

**Questions and Comments during Presentation**

- Are there data to show that systems not being actively regulated are worse off than the systems in counties that ARE being regulated?
- You should invite realtors and developers to these meetings
- It's discriminatory to allow more connections on the west side than the east side
- In focusing compliance efforts on high public health risks, would you force a system to drill a well?
- 1 person out of 25 attended a Group B educational workshop
- It will take more money to enforce the 24-hour notice proposal
- Has there been a public outcry for more testing?
- Do you have data on the casualties of arsenic poisoning?
- If a system has a good testing history, additional testing shouldn't be necessary
- In considering reducing requirements for the smallest systems, don't forget the small guy – they matter, too
- In considering increasing requirements for larger Group B systems, this will add additional costs to operating our small system.
- Does the State consider an association paying \$5/mo a system that sells water?

**High Public Health Risks**

- Existing sources without contamination shouldn't be subject to new rules
- Don't disagree with high public health risk definition
- Are any of these sources really risky?
- Look at data from arsenic
- Quantify need for increased or decreased testing
- No support for increased testing
- More frequent follow-up if tests are bad – same as existing

**Updating Design Guidelines**

- Current format and structure makes it seem like there are too many hoops to jump through – it's not clear what is expected of someone trying to get a new system approved
- The initial pump test should be at least 8 hours to ensure appropriate well supply
- Have higher design standards for Group Bs that are near Group As in proximity (i.e. require 6 inch pipe; define "near" as a Group B system that is inside a Group A water system service area)
- Would like to see more flexibility in the proposed water use standards

- Don't make rules so stringent that folks can't have two residences on one well
- "Simple system" should be defined as a public water system serving less than ten service connections consisting of a simple well and pressure tank with one pressure zone and not providing treatment other than chlorine disinfection or having special hydraulic considerations" (don't add to this current definition)
- Continue to require submittal of water system drawings
- Don't add costs to purveyors by requiring them to find professional engineers to design new simple systems when they rely on the State for project approval
- Don't tie the public's hands by adding regulations that will cost them more

### **Communication and Education**

- I support each of the ideas except #2 – making water quality available to permitting authorities – it's intrusive
- Quicker public notification is doable
- Education is a good idea for individual well owners
- Reminders are a good idea since some people don't run systems

<p>33 attendees          ~ 1 at HPHR          ~ 5-6 at Guidelines          ~ 5-6 at Comm &amp; Ed          ~90% owners/operators</p>
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## **Group B Forum Comments Ellensburg Days Inn September 10, 2008**

### **Questions and Comments during Presentation**

- Where does the State get their funding for Group B systems?
- Considering the number of people served by single-family wells, it's a good reason to include them in education efforts
- How often should LHJs inspect the wells? "I've had the same well but only had it inspected once in 15 years"
- Why is the proposed water use standard so high for the east side? Is this for new systems only?
- Will Ecology or DOH go out with the well driller and ensure surface seal is present? If you are only going to allow 4 connections, then why go through the hassle if you can get two 2-unit waivers?
- Sometimes rules are developed that work fine for the west side – they have a better financial base and can charge \$100k per lot whereas on the east side we don't have the money, especially in the RURAL AREAS where most Group Bs are developed.
- There is a huge financial burden to acquire a water right or hire a PE.
- This water use standard proposal is counter-productive to Dept of Ecology's proposal to drill less wells. If only four are on a system, then more wells will be drilled.
- Strongly opposed to SMAs – it's another layer of bureaucracy.
- Include the cost of a well in the financial analysis.
- If Ecology is saying only one well per 40 acres and DOH is saying only 4 connections per well, that leaves us able to put only 4 homes per 40 acres.

### **High Public Health Risks**

- Comfortable with once per year sample
- OK to not approve high risk source systems
- Likes idea of reminder cards

### Updating Design Guidelines

- It shouldn't be necessary for only PEs to design plans – allow other with expertise and experience to design them
- You'll end up with more SF wells with the proposed water design standards
- DOH needs to better understand what Ecology is doing and eliminate contradictions in rules
- Look into proposed requirement in a current study to have voluntary sprinkler systems for fire suppression in new residential homes – how will this impact what you're doing?
- There is strong opposition to the SMA requirement – other qualified people are available to do this, so make that an option
- Mandate systems to have a designated operator to do the testing

### Communication and Education

- Would like more educational materials about arsenic – where are arsenic hot spots? Require less frequent tests if not in a hot spot
- Yes on annual notifications – wouldn't hurt
- What is a community well? What are SMAs? Host tutorials or workshops annually for these kinds of topics
- Would like more info on the WFI
- Yes to quicker notification when a bad sample is confirmed

### Comment Cards

1. I would like to encourage requiring meters so that households can keep track of how much water they're using.
2. I agree with the implementation of higher standards such as reducing the arsenic level.
3. I want to let you know of an actual situation. There are four households on our well. We have junior water rights, but we are the only household using the irrigation water. The three other households irrigate off the well. I'm not sure that having different rules for households with water rights is a good idea. **(Group B System Owner/Operator)**
1. Need better coordination on exempt well issue by DOH, DOE, GMA. Also consult with CTED on Farm Worker housing, especially seasonal use. DOE wants to limit water use and is trying to get rid of exempt wells/limit growth in rural areas.
2. Many small farmers in effort to attract labor to rural areas provide housing to employees. Profit margins are small and requiring engineering and/or casing, etc is not cost effective. – Just because DOH staff doesn't have time to review paperwork on those systems.
3. Provide number of complaints for each of the high risk categories by year for five years. Is this a perceived problem or an actual health problem? **(Tree Fruit Farmers)**

54 attendees  
~ 10-12 at HPHR  
~ 8-10 at Guidelines  
~ 8-10 at Comm & Ed  
~85% owners/operators

**Group B Forum Comments**  
**Mount Vernon**  
**Best Western CottonTree Convention Center**  
**September 15, 2008**

**Questions and Comments during Presentation**

- Why aren't single-family wells regulated since they account for 920,000 people?
- Will the proposed changes affect existing systems?
- Please explain the exempt well & water use standard again – could this be waived with a PE justification?
- If the State decides to not approve high sources, could there be an option to allow a homeowner's association to allow such approval?
- What should we do if a nearby mine contaminates our wells?
- Why make water system info available to lending institutions?
- The sanitary survey went from 50 important items to 160 items to account for. This has become burdensome – don't do the same with Group B regulations.
- I don't agree with reduced requirements for smaller systems – all people deserve the same level of protection.
- If you want to charge by the hour, why would you not have the resources to do all you need to do? <per hour is for approval only> Isn't that the vast majority of the changes you're making? <no – data system work, etc>

**High Public Health Risks**

- Would like peer review of DOH activities – designs, surveys, etc.
- Use local/regional organizations?
- No arsenic rule for Group Bs
- Specificity about types of treatment options
- Model septic monitoring workshops
- Let small groups opt out
- More requirements? Maybe – twice/year?
- Concern over waiving all monitoring
- Like focus on high public health risks
- Several concerns over not approving new Group Bs with high risk

**Updating Design Guidelines**

- If online form is too rigid it might limit design
- Don't make filling out the form harder than the engineering
- Current Group B workbook doesn't fit anything other than community systems
- Like idea of having it electronically/online
- No flexibility for <800gpd? Can't we use other criteria to reduce that?

- Water use standard is too rigid
- Water use standard doesn't reflect any data collected
- Water use standard is not a realistic requirement for all areas
- Can rainwater catchment supplement usage?
- Water use standard stops creativity
- Water use standard will be challenged legally
- How will water use standard impact septic design?
- How would proposed standard promote water use efficiency?
- Water use standard will promote drilling of individual wells
- What about stock watering?
- "Simple system" should be defined as a well, pressure tank and distribution only
- For non-PE designs, who signs off?
- Require Group Bs to meet Group A design standards if they are within a certain distance of a group A system
- Will there be an upper limit for the review charge?
- Publish historical data on review times
- Cost estimate up front?
- Against giving regulators a "blank check"
- Current method of charging is not fair for good designs
- Need to have good, clear guidelines up front
- What happens if you get a bad state review engineer?
- How will you assure that system is installed as it was designed?
- Additional guidance on financial viability would be good
- Technical assistance would be very helpful for financial viability
- Financial viability is totally irrelevant to non-residential
- Low-interest loans of \$100k or less with less headache

### **Communication and Education**

- Support for annual reminders, especially for nitrate
- State should send WFIs to Group B systems (same as Group A)
- In favor of on-line WFI
- DOH's website is too difficult to navigate – organize it so it's easy to find Group B information and use every day language that average folks can understand
- No problem with giving lenders/permitters water system data – they already access this and are getting more strict with their requirements
- 24-hour notice is a really good idea – 28 days is too long. Could even go to 12 hours? Clarify that it's for a confirmed sample
- Agree with expanding education efforts to single-family well owners

- Requested information/training:
  - Good instructions for pulling samples
  - Better education regarding arsenic, nitrate, etc.
  - Detailed instruction/steps to go through for meeting all requirements
  - Training for new system planning
  - Provide a user/operator guide that is user-friendly and covers all requirements in rule
  - Help folks understand issues with water rights – and how Group B systems are affected
  - Training/teaching on how aquifers work – recharge rates, etc
  - Include a Group B section in Water Tap & send the publication to Group B system owners and operators.

**Comment Cards**

Dividing Group B systems into 2 parts by size is a **BAD IDEA!!** It will simply cost the DOH more time and effort (and money). In addition, sampling requirements should remain the same for all “B” systems – the requirements are really minimal as it is. **(Group B Owner/Operator)**

Regarding approval: Current definition of provisionally approved – inadequate – should include source inventory, well site inspection, covenant (or best attempt), screened well vent, water well report, source meter, quantity pump test, info on equipment, IOC, bacteria, as-built drawing w/ full info, as-built schematic of pump house w equipment, 20 psi min, ASME, future buyer info filed on properties, service area (properties) **(Local Government)**

If only 40% of current Group B systems are complying with existing requirements that seems to define a health risk. Perhaps available resources should be used to correct this deficiency. Redefining Group B sizes with more sampling requirements complicates the issue without improving risk factors. **(Group B owner/operator)**

Design – may need more flexibility instead of inflexible 800 gpd. Should allow P.E. justification. What will happen to 2-connection systems – part – very flexible. Goal should be “the best source at the best location”.

On the matter of proposed changes to Design Guidelines: instead of changing project review fees, or perhaps in conjunction with this, put together a set of Group B Standard designs from which owner/engineers must choose when setting up a new system. Somewhat on the order of the standard septic designs approved by the Department of Health. That would help to cut costs and increase efficiency as well.

35 attendees  
 ~ 7-8 at HPHR  
 ~ 7-8 at Guidelines  
 ~ 7-8 at Comm & Ed  
 ~75% owner/operators

**Group B Forum Comments  
 Olympia  
 Point Plaza East  
 September 17, 2008**

**Questions and Comments during Presentation**

- Do you have a breakdown of DOH’s Group B expenditures? How much is spent on existing vs. new systems?
- Where do the funds come from? Do you charge fees that support the work you’re doing?
- Regarding the existing state program, what kind of emergencies do you respond to?
- If I have a 2-party well, am I considered a Group B system? What about 2 families on one parcel?

- How would you monitor usage with the 800 gpd limit? What about systems that might use more?
- Will review fees be consistent across counties?
- What about HPHR sources if treatment will be provided?
- I'd like to see this rule have a more ecological, sustainable focus on source.
- How many Group Bs were approved last year?
- What is the definition of a shallow well?

### **High Public Health Risks**

- Should rainwater be considered surface water?
- Ok with High Public Health Risk definition
- Some concern with blanket “no” to HPHR sources – maybe larger system ok? One size doesn't fit all
- Concern about 2 levels of monitoring standards
- Thurston PUD and Washington Water are being very selective about new Group Bs
- Existing systems:
  - Need to be creative
  - Need to link with local permitting
  - Notification
  - Market mechanism
- Spring sources may be ok w/ GWI determination
- Split opinion about increasing monitoring requirements

### **Updating Design Guidelines**

- Why not adopt Group A design guidelines for Group Bs?
- Increase to 1250 gpd depending on size of lot (1 person)
- 800 gpd is arbitrary, and likely too high – where is data to support this number? (majority)
- Make provision for counties to approve lower standards with appropriate monitoring in place
- Keep 800 gpd as guideline, to rule
- What about the role of SMA? Why isn't the SMA program being enforced?
- If there was more dependency on SMAs, DOH would have less work
- SMAs lack the clout for enforcement
- Regarding whether or not a PE should be required to design new systems – first we need to know how many counties have active designer programs. If county doesn't have one, it's a moot point.
- Are there counties currently allowing non-PE designs?
- Consult with Board of Registration for certifying non-PEs – this would provide consistency across the state
- Don't hamstring counties that depend on the State's program by requiring PEs when there are non available in the those counties
- What is the approval process for existing, but non-approved Group Bs?

## Communication and Education

- For notification, clarify whether it's a door hanger or in-person
- If the county runs the Group B program, why can't they send a reminder in my yearly bill?
- Reminder is a good idea if the cost is reasonable
- Use email notification
- Send notice one month prior to sampling deadline
- 24-hour notice is a good safety practice for consumers
- Good idea is notification is a door hanger
- Will email notification work?
- Multiple notification methods may be best left to system owner
- If there is a WFI change, update info via postcard
- Online updates to WFI could cause problems for security
- Password protect the online WFI portal
- Downside – if owner moves, no one keeps info current
- It may not work, depending on if there is a county program
- How can we bring “unknown” (i.e. unapproved, undocumented) Group B system into compliance? Regulate inspection program.
- Distribution of communication materials could be expensive
- Make education available on the Web

## Comment Cards

1. Rule needs to address “green” sources such as rain water harvesting as a source for a public group B system. I realize treatment and O&M is needed. Thus, there will need to be a balance to protect PH and promote sustainable efforts.
2. Omit 2 connection systems from the rule.
3. Rule should include 3-14 connection and less than 25 people per day (**Local Government**)

52 attendees ~ 10 at HPHR ~ 7 at Guidelines ~ 2 at Comm & Ed ~ 80% owners/operators
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**Group B Forum Comments  
Bremerton  
Sheridan Park Community Center  
September 24, 2008**

## Questions and Comments during Presentation

- Could you provide a clear definition of an exempt well?
- Is the 800 gal/day for new designs?
- It seems like you would want more options for water demand guidelines considering the need for conservation.

- Shoreline areas with salt water intrusion face increased dangers to the aquifer by pulling in such a high volume of water (800 gal/day).
- Is there currently an annual testing requirement for arsenic?
- Are you going to lower arsenic maximum contaminant level (MCL) to 10 parts per billion?
- Are the systems that aren't complying with ongoing monitoring requirements the same ones that don't have Satellite Management Agency (SMA) oversight?
- How is SMA compliance in counties complying with ongoing monitoring?
- What is the compliance rate with nitrate testing?
- 1 person out of 52 has attended an educational training
- Regarding the 24 hour notice idea, how do you define contamination? Make sure it's well-defined and we're clear about how notice should be given.
- What are typical sources of arsenic? Are some areas of Puget Sound higher than others?
- Are you saying DOH would rather have 6 potentially untreated single-family wells instead of a 6-connection Group B with treatment? Is there data to support this idea?
- What about other heavy metals? Will there be changes in MCL?
- What guidelines are given to single-family well owners now?
- Do we have people dying from arsenic?
- Currently, we have a system with capacity for 6 connections, but we only use 3. How would different requirements for different sized Group Bs apply here?

### **High Public Health Risks**

- Consider removing certain uses from being public water system – business has requirements for testing
- Generally ok with description of high public-health risk
- Group B must be a drilled well – ok
- Need info on how to safeguard dug well
- Other uses might be an issue with HPHR prohibition. Need testing but should be able to use all sources
- Forget about different regulations for different sized systems
- Concern with chemical addition (chlorine) and impacts
- Idea to apply Group A standards for GWI systems
- Concern about lawsuits with prohibiting the sources you're talking about

### **Updating Design Guidelines**

- Simplifying and reformatting the guidelines is a good thing
- Is there really a need to redesign the guidelines from the current workbook?
- Simple is good – don't try to build a Mercedes when the Ford we have works fine.
- If you restrict outdoor use and have metered data (CCR, 3<sup>rd</sup> party ownership, etc) can group A standards be applied?
- If it is an existing system should we not establish water use standards if metered data is available?

- How do we apply the standard to existing systems that need expanding or improvements/repairs?
- When boosters or storage are involved, make PE design a requirement
- Whether or not a PE is required is already clear – not a big issue
- Regarding hourly fees for approval review, there is concern that water systems might be penalized if they hire the wrong engineer
- Hourly rate instead of fee is fine
- There is a chance of abuse with the hourly rate idea
- Instead of using the term “financial viability guidance”, say you’re providing a sample financial plan for water systems – “guidance” often turns into “rule”
- Problems with systems that are “too” over designed

### **Communication and Education**

- The address for a well remains constant, so mail info to “water consumer” to avoid returned mail for wrong person
- Annual reminder is a good idea – but try to avoid duplication with county efforts and be sure contact info for recipient is correct
- It’s a good idea to make water system info available to lenders, permittees – just don’t let that be the start of over-regulation
- WFI portal would make updating info easier, but be very cautious in controlling the use of the on-line form – “garbage in, garbage out”
- Requiring quicker notification is good – 24 hours is reasonable
- How will you be sure your audience knows about your educational materials, training, etc?
- Coordinate with other State agencies, utilities, etc to put info about website in their newsletters
- Air a public service announcement – who to contact, where to go for help
- Designate a water quality month
- Provide training for good sampling techniques
- When a regulation changes, how does it get communicated to those who need to follow it? How to folks easily know what changes were made?
- Different requirements for different sized Group B systems is unenforceable
- Keep it simple – don’t over regulate

### **Comment Cards**

- A TV program said Nestles are buying up water rights all over the world including Washington State. What percentage of Washington’s water have they bought?
- Our system is not broken & we don’t need additional requirements. We have an excellent system well-maintained by us and we take samples (the correct method) annually and every time we made a repair. Steve Twiss sends us a bottle every October (we don’t need a postcard). I don’t think we have missed a sample in 15 years. We know how to treat water if we find bacteria. We meter and system and each house. We have very qualified knowledgeable people in the neighborhood and we don’t need training or an SMA. We drink the water and are the real stakeholders of quality.

**Comments Received via Mail**

Water testing reminder OK

No mandatory tests!

No water meters on private wells!

No restrictions on personal/private wells!

Leave the working class alone!

No ridiculous taxes for trumped up ideas!

Remove “water right” requirements (You buy = your water!)