

## Division of Drinking Water Policy/Procedure

Title:	Group A/B Water System Classification	Number: A.07
References:	N/A	
Contact:	Alan Rowe	
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Supersedes:	A.07 Group A/B System Determination 5/1/95 (Revised 4/12/96)	
Approved:	(signed copy) <i>Director, Division of Drinking Water</i>	

Drinking water policies are written descriptions of the approach taken by the Program to implement a statute, regulation, court order, or other agency order, and may include the Program's current practice, procedure, or method of action based on that approach. Any generally applicable directives or criteria that provide the basis for imposing penalties or sanctions, or for granting or denying Program approvals, must either be in statute or established in a rule.

### **POLICY:**

1. The Department of Health (or Local Health Department per Joint Plan of Operation) shall classify public water systems as Group A or Group B according to information received regarding actual design and construction of system facilities. The classification shall be included in:
  - The letter acknowledging the construction completion report (for new or expanding systems), or
  - The approval letter (for as-built approvals) or,
  - Classification letter from Water Facility Inventory (WFI) staff when existing systems are activated.
  
2. System classification shall be based on physical capacity of system facilities.
  - For Group A, the system shall be designed and constructed to serve the number of residential connections or non-residential population consistent with WAC 246-290-020 (1) through (5)
  - For Group B, the system shall be designed and constructed to serve the number of residential connections or non-residential population consistent with WAC 246-290-020 (5) (c).

**Note:**

- Based on their Joint Plan of Operation, it is expected that when local health jurisdictions receive documents for a Group B system which are phased to eventually expand to a Group A system, the documents will be forwarded to DOH for review and approval.
- As outlined in the "Guidelines for Group B Public Water System Approval," a Professional Engineer is required for Group B design if the system includes any of the following: ten or more connections, storage, fireflow, more than simple water treatment or line lengths that exceed the limits for the specified pipe diameter.
- Per WAC 246-291-300 (4), Group B water wholesalers shall be monitored per Group A source requirements if the combined connections are 15 or more or the combined population is 25 or more people/day.

3. When a purveyor decides to expand the water system beyond its designed number of services (community systems) or population (non-community systems), the system owner shall submit the appropriate new or updated water system plan in accordance with WAC 246-290-100 and WAC 246-291-140. Appropriate project reports and construction documents for Group A systems, and design reports (Group B Workbook) for Group B systems shall also be submitted. These documents shall be reviewed against requirements in effect at the time that they are submitted.
4. The Department of Health (or Local Health Jurisdiction per Joint Plan of Operation) shall require public water systems to conduct ongoing monitoring based on the information indicated in their Water Facilities Inventory for the active connections and population being served.
5. System monitoring shall be in accordance with Group A or Group B requirements as follows:
  - Monitor using Group A requirements: Systems providing service to active connections or residential or non-residential population consistent with WAC 246-290-020 (5) (a) and (b).
  - Monitor using Group B requirements: Systems providing service to less than 15 residential connections and less than 25 people/day or, 25 or more people/day during fewer than 60 days/year consistent with WAC 246-290-020 (5) (c).

**Note:**

- Systems classified for design approval as Group A Community which the WFI indicates have less than 15 active services and serve less than 25 people per day, and as Group A Non-community which the WFI indicates currently serve less than 25 people will show in the database as a Group B. These systems shall monitor water quality according to the current Group B regulations until such time as the population served or number of active connections meets the Group A definition.

## **PURPOSE STATEMENT/BACKGROUND:**

The purpose of this policy is to standardize what constitutes a Group A or Group B system, to establish a process for classifying a system Group A or Group B, and to clarify application of plan review, design standards and monitoring requirements for Group A and Group B systems. This policy is intended to assist in implementing State Board of Health and Departmental regulations.

## **PROCEDURE:**

### (1) Review and Approval Criteria

- Assure that the cover letter for documents submitted for approval indicates the number of connections or non-community population the system is designed to serve. Request this information from the purveyor prior to proceeding with review if it was not provided with the submittal.
- Use appropriate planning and design requirements when reviewing submittals per Page 1 number 2 of this policy.
- Review the construction report/certification and WFI (if required) upon receipt. Send the system owner a letter acknowledging the construction report/certification (cc: WFI staff person) which clearly states the following.
  - Designation of the system design as a Group A or Group B system.
  - The number of connections approved and/or non-community population served.
- WFI staff will send out a new WFI with on-going monitoring requirements.
- Enter system information in the DOH database. This may include entering information from the WFI and assigning an ID number if the system is new (See Establishing New Group A Water Systems Policy # N.03).

### (2) Ongoing Monitoring

Apply ongoing monitoring requirements specified in the current Group A or Group B regulations, according to the reported active connections and population served on the annual WFI update. Group A monitoring requirements that depend upon population shall be based on the combined residential and non-residential population indicated on the system's current WFI.

(3) To track population changes and assure appropriate monitoring, WFI mailings will be sent out per the following schedule:

- Group A - once per year
- Group B - once every three years
- Approved Group A's (designed under Group A criteria) that will show in the database as Group B's until the increase in active connections or population require a change to a Group A- once per year. (This tracking will be conducted through SADIE.)

## IMPLEMENTATION

### Step 1

Conduct a one-time review of existing Group B systems which the Drinking Water database indicates are approved for 15 or more services to confirm appropriate classification as a Group B. Any system not confirmed as a Group B through submittal of a revised WFI shall be classified as Group A according to number 2 on page 1. (To be accomplished by Data staff and the Regional Offices staff and LHJ if agreeable).

### Step 2

Meet with DOH local health staff, informing them of the new policy, its implementation process and for determining how to incorporate it into Joint Plans of Operation.

### Step 3

Meet with Local Health Jurisdictions, informing them of the new policy, how it will be implemented and when to begin implementation.

### Step 4

Conduct WFI mailings per WAC schedule (procedure 3) to assure data is up to date for application of monitoring requirements (provided that LHJ agrees with schedule for mailing).

### Step 5

Due to database limitations, manual tracking will be conducted for Group B systems wholesaling water to another public water system when the cumulative number of services or population served meet the definition of a Group A system. Systems in this category must be tracked by the Regional Office staff and will be referred to the source monitoring staff for mailings.