

# Potential Program Changes Group B Public Water Systems

## *Discussion Paper*



August 2008

### **What is a Group B public water system?**

Group B public water systems are very small water systems. Most Group B water systems serve two to 14 homes. Other Group B water systems serve small businesses that employ fewer than 25 people or have no more than 25 customers per day.

Group B water systems are regulated under chapter 246-291 of the Washington Administrative Code. Most local health agencies have agreements with the state Department of Health, Office of Drinking Water to share responsibilities for regulating Group B water systems. This means a Group B water system could be regulated by either the state or local health agency, depending upon the county in which it is located.

### **Why are we discussing changes to the Group B rule and program?**

The state adopted the Group B public water system rule in 1994. Over the last 15 years, we have learned a lot from regulating these very small water systems. Based on this knowledge, we believe changes are needed to better focus on core public health protection.

There are over 13,000 Group B water systems in Washington. With so many water systems to oversee, the state typically only gets involved with Group B water systems when consumers are faced with serious public health threats. We want to make program changes that will allow us to target our limited state resources most effectively.



### **What has been done so far?**

In early 2008, we met with a number of local health agencies to talk about the challenges we all face in working with Group B public water systems. We talked about changes to the regulatory program that could address these challenges. We also agreed that people who get their drinking water from Group B water systems need better information about our limited role in overseeing these systems.

### **What changes are being discussed?**

We would like to share water system information with more of the public by using email and Web sites. We believe many water system problems could be resolved if information were more readily available to customers, realtors, lenders, local governments and others.

Other possible changes include:

- Focus program resources on resolving high public health risks (see below).
- Improve technical guidelines for approving new Group B water systems (see below).
- Update drinking water standards based on current scientific information.
- Send water quality sampling reminders each year to Group B water system owners and operators.
- Create an easier way to keep water system contact information updated.
- Have stricter water quality monitoring requirements for larger Group B water systems.
- Require water system operators to notify consumers of contamination more quickly.
- Improve and expand our education programs to include individual well owners.

## High Public Health Risks

### Why focus resources on high public health risks?

There are a few hundred Group B water systems we consider “high public health risks.” These systems have water sources that are considered riskier for consumers. Some examples of high-risk drinking water sources are:

- Streams.
- Springs.
- Dug wells (wells not drilled by a licensed well driller using steel casing).

High-risk sources for drinking water supplies are more likely to make people sick than lower-risk sources. This is because bacteria and disease-causing organisms have more opportunities to get into the water. Other sources are high risk because they already contain contaminants that could harm people drinking the water. Examples include:

- Presence of harmful bacteria such as fecal coliform or *E. coli*.
- Nitrate concentrations above 10 parts per million (ppm).
- Arsenic concentrations above 10 parts per billion (ppb).

We would like to provide technical assistance to help existing water systems remove these high public health risks. In some cases, a water system might end up with a new, safer source of water. In other cases, a water system would need to install treatment or fix equipment to avoid low pressure, water outages, or contamination that could make people sick.

We are also considering whether we should stop approving new Group B water systems that have risky water sources. This will help make sure any new Group B water system is able to provide safe, reliable drinking water on an ongoing basis.

## Updating Design Guidelines

### What improvements are we considering?

We currently provide a workbook (DOH Publication #331-071) to help people who are planning to develop a new Group B water system. The workbook includes technical guidelines for water system design, forms and worksheets for calculations, and a checklist to make sure the required parts of an application are completed.

One of the most common complaints from guideline users is readability. We would simplify and re-format the guidelines so that it is clear how they apply to specific projects. The updated guidelines would be more user-friendly.

We would also be more specific about requirements for calculating water demand for residential connections. Many new Group B water systems use “exempt wells,” which are wells that do not require a water right from the Department of Ecology. Consistent requirements will help determine whether a water right is required for a given Group B system.

We would also make additional changes to the Group B water system design guidelines:

- Create easy-to-use forms that can be downloaded from the Web.
- Reflect changes in technology.
- Improve consistency with Group A (federally regulated) water system guidelines.
- Provide clearer guidance on financial viability.
- Define what types of treatment and storage are “simple” and what types are considered “complex.” This would make it clear which systems must be designed by an engineer and which water systems can be designed by someone without a professional engineering certificate.

### We want your feedback

We want to hear from you about our proposed changes to the Group B rule. We will be hosting public forums throughout the state this fall. You can find information about the forums and driving directions on the Group B Web site at: <http://www.doh.wa.gov/ehp/dw/groupb.htm>

We have also created an e-mail list to help you stay informed during the Group B rulemaking process. We will send e-mail notices whenever we schedule meetings and when new information is available. You can sign up at the Group B Web site listed above.

### For more information

If you would like to talk to us about changes to the Group B program, contact:

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