

**From:** [Tyler Fortunati](#)  
**To:** [Paula Wilson](#)  
**Subject:** FW: DW Rules Considerations  
**Date:** Friday, March 31, 2023 9:32:28 AM

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Hi Tyler, I hope I am not too late to provide some feedback on the rules undergoing ZBR this spring. I have gathered some feedback from our board and staff members and would like to share some of our ideas below.

Considerations for section 553 (system classification):

We do not see any reason to change the rules per se but would like to have some further discussion in coordination with DOPL and possibly some additional guidance available to the regional DEQ staff when a system classification changes from very small to class I. The challenge is when the population of a community increases thereby requiring a previously classified very small system to class I. The current rules do not allow for a smooth transition to upgrade the license thereby putting the system out of compliance or in the situation of needing to hire an expensive contract operator. We have received input from DEQ that the regional offices have some flexibility (i.e. grace period) to work with the community allowing them time to upgrade their licenses. But this is only an informal process. Is this something that could be included in guidance so there is consistency from region to region?

Consideration for section 543.04 & 552.06 (cross connection):

1. There is a conflict in these sections when referring to the AWWA Pacific Northwest Section Cross Connection Manual and the uniform plumbing code manual in regards to double check valve backflow prevention assemblies. The AWWA Pacific Northwest Section Cross

Connection Manual is a fantastic reference guide, so we highly recommend leaving the manual as a reference document in front of the rules. But in section 543.04 and 552.06.b., the reference to the manual should be removed since it directly conflicts with the uniform plumbing code which has been identified as the overriding rules for the double check valves. An alternative option would be to clarify that small distinction in the reference material but we couldn't figure out how to do that in a clean fashion in the rules.

2. Please consider eliminating section 552.07. We feel that a cross connection control program is beneficial for all systems similar to the requirement for community water systems. The full cross connection control program is preferable so that the PWS is familiar with and verifying all connections. The full program requires protection installation prior to providing water service. Without this verification it is possible that the PWS may not be aware of a new device. Elimination of this section also helps simplify the rules and eliminate word count.

Consideration for section 900.01 (setbacks):

Is there any possibility of increasing setbacks listed in Table 1 of section 900? With our work in the field and source water protection some of these setbacks are fairly thin. We weren't sure about the source of these figures but wanted to ask about the possibility of increasing some of them. We did note setbacks are also referenced in sections: 504.07.b.viii, 510.02, 542.07 and .08.

Thank you Tyler. Give me a call with to discuss if you like.

*Shelley Roberts, MBA, CPA*

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