

From: [Tyler Fortunati](#)
To: [Hannah Young](#); [Jerri Henry](#); [Paula Wilson](#)
Subject: FW: Drinking Water: Docket No. 58-0108-2301-Proposed Rule Comments
Date: Tuesday, October 10, 2023 10:18:32 AM

One additional set of comments.

Tyler Fortunati, REHS, CPM, MSIH | Drinking Water Bureau Chief

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From: Michelle L. Johnson <mjohnson@jub.com>
Sent: Friday, October 6, 2023 4:36 PM
To: Tyler Fortunati <Tyler.Fortunati@deq.idaho.gov>
Subject: Drinking Water: Docket No. 58-0108-2301-Proposed Rule Comments

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Good afternoon Mr. Fortunati,

I have the following comments regarding the proposed rule updates for Drinking Water: Docket No. 58-0108-2301

Section 003.73 – The language adding the date of July 1, 2007 to the definition of Substantially Modified appears to be to be a rule modification that may cause a system to become out of compliance for a rule that was not in place the time of the system improvements, and adds requirements in a retroactive manor.

Section 300.04 – There may be a typo, and the word “after” may have been intended to be deleted in the sentence “...mg/l disinfectant residual in the treated water after at peak hour demand before delivery to the first customer.”

Section 552.01.b.v – the change from 100 psi to 80 psi as the maximum pressure requirement for PRV installation in the distribution system seems unnecessary with the pressure requirements of current construction materials, and will likely trigger high cost capital projects with little benefit.

Please let me know if there are any questions.

Thank you,

MICHELLE L. JOHNSON, P.E.
Project Manager

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