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October 20, 2025

Tyler Fortunati  
Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706

RE: General Rule Making - IDAPA 58.01.08, Rule 552.01.b.v.

Dear Mr. Fortunati,

Veolia Water Idaho is writing to respectfully request that the draft rule that was published in Bulletin 25-10 on October 1, 2025 be amended.

**For background information:**

For efficient Public Water System (PWS) operation, system pressures sometimes must exceed 100 psi. System components such as pipe, fittings, etc are designed to safely experience pressures well above 100psi. However, as a general rule, our PWS seeks to keep pressures at service connections below 100 psi. Where that is not feasible, system-wide or service line PRVs are utilized. Plumbing code covers the home pressures remaining below 80psi, typically through a homeowner installed PRV and is a different standard than PWS design and safety.

The currently proposed changes (October 1, 2025) to 552.01.b.v are more stringent than prior language and will severely restrict PWS design and significantly increase the cost of PWS operation without materially improving system safety or customer satisfaction and potentially harming safety, particularly for fire sprinkler design. DEQ can review system design and require a 100psi pressure standard where needed, but plumbing code clearly covers the in-home considerations of high pressures, which is different from PWS design and operation.

Additionally the language of July 1, 2024 and proposed language of October 1, 2025 require significant DEQ staff time for review of each instance of pressure exceeding plumbing code requirements, and has greater potential for varying interpretations. The modifications we propose below, we anticipate, will reduce DEQ staff time required and improve clarity in interpretation.

**Proposed language:**

The following language is intended to capture a PWS standard rather than a home plumbing standard. We propose that this language replace the existing and proposed 552.1.b.v (1), (2), and (3).

v. Any new or substantially modified PWS area should ordinarily maintain a maximum pressure of 100 psi, where it is feasible to meet the pressure requirements as part of the material modification, measured prior to the structure, facility, or premise which is connected to the PWS water source, and which is or may be used for domestic purposes (service connections).

- (1) Pressures above 100psi at service connections must be controlled by pressure reducing valves installed in the distribution system (preferred) or at individual service connections.
- (2) If static pressure at a service connection exceeds 100psi the Department may approve the use of pressure reducing devices for individual service connections on a case-by-case basis.
- (3) If PWS modifications will cause pressure to routinely exceed 80 psi the PWS owner must notify affected customers. Notification may include reasons for the elevated pressure, problems or damage that unmitigated elevated pressure can inflict on appliances or plumbing systems, and procedures or mitigation efforts affected property owners may initiate to minimize problems or damage.

If this language is not acceptable, we would prefer the language that was in the rule prior to July 1, 2024.

Thank you, we very much appreciate your attention to this matter.

Sincerely,

Cathy Cooper, P.E.  
Director of Engineering  
Veolia Water Idaho