

From: [John Lovie](#)
To: "PFAS@doh.wa.gov"
Subject: Informal comment on PFAS rulemaking from Whidbey Island Water Systems Associations
Date: Tuesday, January 21, 2020 11:59:00 AM

On Friday January 17th, Whidbey Island Water Systems Association held a special member meeting to discuss the draft changes to WAC 246-290. The following comments were discussed and approved unanimously by the water system representatives in attendance:

- **Sampling locations:** Clarify that routine sampling for the contaminants with a SAL listed in this update will take place at the same location as for other organic contaminants, which is after treatment, if any, at each entry point to the distribution system
- **SDRLs:** Add the SDRLs for the contaminants with as SAL to 246-390 before at the same time or before releasing this update. Otherwise add a note that SDRLs are under development.
- **SAL Exceedance:** Define in the definitions section "confirmed detection" as in "SAL exceedance based on: confirmed detection"
- **Additional Monitoring:** Delete tables 10 and 11 and all references to follow-up monitoring and follow up actions for contaminant levels under the SAL. DOH already has discretion to ask for additional routine monitoring in cases where this may be necessary.
- Please also note that Table 10, "20%" should read "<= 20%"
- **MCLs:** Add language documenting criteria for creating an MCL at the State level, as has been done for SALs
- **DWSRF:** Make Drinking Water State Revolving Fund loans and other drinking water grants and loans available for corrective action following a SAL exceedance as they are for MCL exceedances
- **Phase-in period:** Document the criteria used to decide when in the three year phase in period a given water system will be required to test.
- **Waivers:** Add at least a road map for how the waiver program will be developed as field data becomes available.
- **Documentation:** Create an explanatory document for water systems in plain English describing these changes in sufficient detail for implementation. Include flow charts for contaminants with a SAL in new sources, routine monitoring, follow-up monitoring, post-treatment monitoring, and notifications and corrective actions. Unless follow-up monitoring is removed as recommended, , include a flow chart that shows what happens when a sample comes in at <=20%, >20% and <80%, >=80% and <100% or >=100%. Please also address here what happens if the SDRL is >20% of the SAL. Please also address what happens if a lab lists a result which is under the SDRL.
- **Labs:** Please provide a list of accredited labs able to test for contaminants with a SAL.

Representatives of the following water systems were in attendance and unanimously approved the comments:

Bayview Meadows
Campo Hacienda Community Association
City of Langley
Holmes Harbor Water Company

Koontz Ranch Homeowners
Mariners' Cove Beach Club
North Bluff Association
Race Lagoon Heights Association
Scatchet Head Water District
Seawest Services Association
Shangri-La Shores
Sierra Country Club
Sky Meadows Community Association
Sunlight Beach Water Association
Sunlight Shores Country Club
Sun Vista/Sunlight Beach
Town of Coupeville
Treeline Water Association
West Beach Road Association
Whidbey West Water Systems
Widarama Beach Water Rights Assoc.

Additional Attendees represented:

David Engineering
Island County
King Water
Island County Water Resources Advisory Committee

Respectfully submitted,

John Lovie
Vice-President, WIWSA

