

Program Guidance - Seasonal Public Drinking Water System Start-Up Procedure Summary of Changes Based on Public Comments

Thank you to the individuals that provided feedback on the Department of Natural Resources (Department) proposed program guidance titled “Seasonal Public Drinking Water System Start-Up Procedure”.

Six e-mail comments were submitted to the Department during the public comment period. Included below is a copy of each of the public comments received.

In summary, comments provided suggestions for improving the print format, adding clarifying language, requiring additional water samples, and encouraging proper system shut down. Two of the comments inquired about the effective date and applicability of the procedures, responses were provided as noted below.

As a result, the Department made the following changes to the guidance. Clarifying language was added as suggested. A note encouraging proper system shut-down was added.

The Department will take into consideration the suggestion to improve the print format, when making future updates to the print version. The Department did not change the start-up procedure to require additional water samples, the current requirement to collect a water sample within 30 days of seasonal system start-up remains unchanged.

The following information was provided in response to questions about the effective date and applicability. The seasonal system start-up procedure requirement will be applicable to seasonal systems, beginning in 2016. A “seasonal public water system” starts up and shuts down at the beginning and end of each operating season, and depressurizes at least part of the water system at some point during the year. Examples include: Ski chalets, summer resorts, camp grounds, and restaurants that are only open during part of the year.

The final guidance was issued on April 9, 2015.

If you have any questions, please contact Eileen Pierce at (608) 275-3311 or eileen.pierce@wisconsin.gov .

From: Bill Scott [mailto:Bill_Scott@gshllp.com]
Sent: Friday, March 13, 2015 3:01 PM
To: Pierce, Eileen F - DNR
Subject: comment on seasonal water system guidance

Eileen –

I found the materials helpful and easy to follow, except one thing. The link to the how to chlorinate your well goes to a brochure that does not fit a standard size sheet of paper. If it could be modified to fit a 11x17 or some standard sheet, it would be easier to use.

Bill.



Bill Scott
Partner

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From: Ten Pas, Diane - DNR
Sent: Friday, March 13, 2015 5:06 PM
To: Pierce, Eileen F - DNR
Cc: Jensen, Jesse M - DNR
Subject: Comment on start-up procedures

Hi, Eileen.

The start-up procedures documents look fantastic! Kudos to the team that put them together.

I have 2 suggestions.

- For item 2 on the check-off list “2) Inspected land around well for potential sources of bacterial contamination.” Add “and removed/corrected sources found”
- For item 3 on the check off list “3) Corrected potential cross connections in water system”, I suggest rephrasing it slightly so it reads something more along the lines of one of these (I underlined my suggested changes):
 - 3) Corrected all potential cross connections found in water system
 - 3) Corrected potential cross connections in water system, if any were found
 - 3) Corrected potential cross connections in water system, or no potential cross connections found on inspection.

It may just be the way I was reading it, but it gave me the initial impression that it was saying they had to find a potential cross-connection to complete the start-up procedure (whether or not any exist at that facility).

Again, they look great! Have a great weekend.

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Diane Ten Pas

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From: BCMaas Maas [mailto:billandcathymaas@gmail.com]

Sent: Monday, March 16, 2015 8:52 AM

To: Pierce, Eileen F - DNR

Subject: START UP PROCEDURE

POSSIBLE ADD OR LOOK AT ADDING ADDITIONAL SAMPLES IN DISTRIBUTION SYSTEM IF SYSTEM IS VULNERABLE TO INFESTATION OF VARMENTS AND OR TROUBLED START UP DUE TO LEAKAGE.

Respectfully William
Maas

Any question, I can be reached at 715-416-0555

From: Mueller, Glenn A - DNR

Sent: Tuesday, March 17, 2015 2:27 PM

To: Pierce, Eileen F - DNR

Subject: RE: Draft RTCR Guidance is Posted for 21 Days for Public Comment: "Seasonal System Start-up Procedure"

Eileen: Comments/additions regarding "Seasonal System **Shut Down**/Start-up Procedure".

1. Since public health protection of the water supply system begins with proper shut down/draining, I think the handout should start there. Once the water supply system is drained and/or blown-out with pressurized air, they should re-connect any piping removed or disconnected or place caps or plug on open water supply lines to prevent the entrance of vermin during non-use months. This would include the openings on a shallow well or jet pump.
2. It has been shown (a study done by the State Lab of Hygiene for Bill Rock, former Private Water Section Chief) bacteria can be drawn into a well through a well vent during pumping cycles. Small enclosures over wells, including fake rocks, can provide harborage areas for insects and rodents and may provide a favorable environment for the growth of pathogenic bacteria. Recognizing that some of these enclosures are to provide additional security for the wellheads from damage and terrorism, the enclosure (and possibly a poured cement pad) should be constructed to eliminate the entrance of insects and rodents while providing adequate ventilation as to not encourage the growth of pathogenic bacteria. This can be accomplished through the use of rigid vents/and or screening.

Thank you for considering the value of the above comments/additions. If you have any questions or need any additional information or clarification of my comments above please let me know.

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Glenn A. Mueller[Name]

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Glenn.mueller@wisconsin.gov

From: Frank Keller [mailto:shadygroveresort@charter.net]
Sent: Friday, March 27, 2015 2:22 PM
To: Pierce, Eileen F - DNR
Subject: Well Start Up?

Eleen,
What if you do not shut your well down because we live here year round, how does this work in this situation?
Frank

From: mkelm [mailto:lkelm27@yahoo.com]
Sent: Friday, March 27, 2015 6:41 PM
To: Pierce, Eileen F - DNR
Subject: //////////???

i Usually understand most of this kind of stuff,,,, Here is a part of the email from Pres Thurston,,,,,I just do not understand what we are suppose to be doing .. can you help me>? MKelm thanks
To All Resort Owners, Below is a proposed protocol for start up of seasonal wells. It appears relatively harmless and requires that you inspect the exterior of your wells prior to start up in the spring. If you have any comments please send them to me ASAP. This comes from the EPA and the State has delayed implementing this until now. Jane Thurston, President, ROA

-----Original Message-----

From: Travis Peterson <travis.peterson@co.barron.wi.us>
To: oakgroveresort <oakgroveresort@aol.com>
Cc: Celina Dieckman <celina.dieckman@co.barron.wi.us>
Sent: Thu, Mar 26, 2015 8:25 am
Subject: Seasonal well start up procedure