

From: Glenn Reynolds
To: commentletters
Subject: Fwd: point of entry regulations comments
Date: Thursday, November 30, 2017 9:58:19 AM



Engineering better water
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Commenter
ID 02

----- Forwarded message -----

From: **Glenn Reynolds** <greynolds@h2osolutions.com>
Date: Wed, Nov 29, 2017 at 6:05 PM
Subject: point of entry regulations comments
To: Melissa.Hall@waterboards.ca.gov, "Mark Bartson (mark.bartson@waterboards.ca.gov)"
<Mark.Bartson@waterboards.ca.gov>

Melissa, I opened the pdf as a google document, added comments via google documents and then shared you into the document. However it is possible that your state email address will not be able to access the google document and thus you would not be able to see the comments. It won't be pretty but I will cut and paste the actual comments into this email. the comment will be first then the page reference and then the text I am commenting on. It will take more time then reading the comments on google documents but less time than asking the state IT department to get you access to google docs. Feel free to call or email with questions.

I would strongly urge that you encourage Point of Entry and or Point of Use. Point of entry will be MUCH more viable for mobile home treatment where point of use is VERY problematic. point of use will be fine for non transients like a school or business where non drinking use maybe significant and drinking water use is incidental to total water volume. Water fountain at power plant as an example. by using both phrases it will keep folks aware of both options and better align with federal guidance page one first line "Point-of-use treatment device" or "POU" means a treatment device applied to

B-01

why not just change this to existing public water systems? that way new systems are excluded. first page middle (a) With State Board approval, aA public water system, except for a proposed new community water system that does not have a domestic water supply permit, may be permitted to use point-of-use treatment devices (POUs) in lieu of centralized

C-02

i would recommend that this be results based not ansi approved! The testing is usually done on specific contaminant challenge levels and if this system exceeds those levels then the "certification" is useless. I would simply require a pilot as the equipment costs less than \$500 and test the result. This allows much lower cost and greater flexibility in equipment selection. page four last paragraph As ensured by the public water system, each POU shall:Each POU must: (1) If theBe independently certified in accordance with an American National Standard Institute (ANSI) has issued a product standard applicable to the specific type of POU, be independently certified in accordance with the

E-03

this is much harder than it sounds. take for example nitrate. A nitrate resin bed filter for an entire mobile home costs \$1,500. However a hach nitrate analyzer costs \$15,000. I think having a schedule for service validated by testing is a better approach. the only monitor which is cheap and effective is a tds monitor for reverse osmosis systems, but i doubt you have many point of entry systems treating for salt and the site would need to prove that they can use salt as an indicator for the contaminant they are treating. page five: (4) (5)Be equipped with a mechanical warning (e.g. alarm, light, etc.) that

E-04

alerts users when a unit needs maintenance or is no longer operating in a manner that assures the unit is producing effluent meeting state and federal drinking water standards, unless the device is equipped with an automatic shut-off mechanism that prevents the flow of water under such circumstances; and

**(E-04
cont'd**

this would be a good location to have language that requires an exterior point of entry as preferred to an interior point of use. For example if you allow point of use on mobile home kitchen sinks, then what about bathroom use and how will you get access to service the unit each month and to test water quality? If the law states that point of use can be used if an explanation as to why point of entry is not viable that would be easy page six:) The public water system's authority to require customers to accept POU's in lieu of centralized treatment and to take an action, such as discontinuing service, if a customer fails to accept POU's;

F-06

this has caused issues in the past where the district engineer thought he was responsible for waste tracking of uranium absorption media how about it states that treatment concentrate streams or backwash streams disposal locations have a plan? and not use the words waste handling? page 9: (6) POU waste-handling and disposal procedures.

G-07

the dictionary defines effluent as liquid waste or sewage discharge. Is that what you want to monitor? the permeate is what I want to drink and what you should monitor wrong word and super important. The the Latin means "to flow out" modern is waste
page ten (2) POU effluent – initially, with samples collected as soon as possible but no later than 72 hours after a device is installed; and
(3) POU effluent, – on-going following the monitoring in paragraph subsection (a)(2) –, annually, with one twelfth of all units sampled monthly on a

H-08

same as above comment. bad word choice PAGE 11 (e)If an on-goinga POU effluent sample result exceeds an MCL for a contaminant other than nitrate, nitrite, nitrate plus nitrite, or perchlorate, the public water system shall:

H-09

shouldn't there be some wiggle room so a violation is not triggered on a bad sample? I would think that five percent of the samples over a year could exceed the limit so there was room for an individual unit which was overrun through some excessive use anomaly didn't mean the entire program was at fault? PAGE 11 (e)If an on-goinga POU effluent sample result exceeds an MCL for a contaminant other than nitrate, nitrite, nitrate plus nitrite, or perchlorate, the public water system shall:

H-10

why strike this. I argue we should leave it in. PAGE 14 d)A public water system shall be in violation of the MCL if:
(1)for all POU's combined, during a 12-month interval more than five percent (5%) of the results of the effluent monitoring conducted pursuant to section 64418.5 exceed an MCL,

K-11

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