

DEPARTMENT OF RESOURCE MANAGEMENT

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Environmental Health Division

November 27, 2018

State Water Resources Control Board
Care Of: Ms. Jeanine Townsend, Clerk to the Board
1001 I street, 24th floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov



RE: **Comments – Proposed Revised POU/POE Regulations**

Dear Ms. Townsend,

The purpose of this letter is to provide comments on the proposed revised permanent regulations for Point-of-Use (POU) and Point-of-Entry (POE) treatment to achieve compliance with drinking water standards. Solano County appreciates the opportunity to provide the following comments to help inform the Water Board about the potential increased cost and regulatory issues the proposed regulations may create within Solano County:

1. In Solano County there are areas with anthropogenic constituents that may rely on POU/POE use with increasing demand on water systems.

Solano County Environmental Health is concerned that the proposed regulations do not clearly provide a mechanism for public health agencies to access the POU/POE operational data within real time in order to identify if the non-residential property use meets POE/POU compliance standards.

2. The additional effort to meet the POU/POE regulations as proposed would likely increase costs of providing water service by public water systems within Solano County. These costs would likely be passed on to customers. To avoid paying higher rates, customers may request to install individual wells. POU/POE devices may be the best alternative to individual wells, despite the potential additional costs.

Solano County is concerned the proposed POU/POE regulation change may result either in higher rates for residents or an increase in private wells which have minimal oversight. Solano County encourages the Water Board to look at all means to minimize requirements and costs of providing POU/POE service while still meeting necessary health and safety goals.

3. The proposed POU/POE regulations may have minimal effect on current Solano County Environmental Health Division operations, as the revisions do not address POU/POE use for microbial contaminants.

Currently there exists an area in unincorporated Solano County where it is difficult to develop private wells for residential use, as water quantity is minimal, and water quality may be impacted. Should the use of POU/POEs be approved for microbial contaminants, it may encourage development on those parcels currently serviced with "raw" (irrigation) water.

Solano County appreciates the opportunity to provide comments on the proposed revised POU/POE regulations. Please do not hesitate to contact me (jissahota@solanocounty.com) if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jagjinder Sahota".

Jagjinder Sahota
Environmental Health Manager