Proposal No. 19-111

Proposal for Task Force Consideration at the ISSC 2019 Biennial Meeting	1. a. ☒ Growing Area b. ☐ Harvesting/Handling/Distribution c. ☐ Administrative
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10. Proposal Subject	Allowing the use of the SRS method in areas impacted by point sources
11. Specific NSSP Guide Reference	Section II. Model Ordinance Chapter IV. Shellstock Growing Areas @.02E; Chapter IV. Shellstock Growing Areas @.02F; Chapter IV. Shellstock Growing Areas @.02F(2)(b); Chapter IV Shellstock Growing Areas @.02G; and Chapter IV. Shellstock Growing Areas @.02H
12. Text of Proposal/ Requested Action	Chapter IV, @.02 E. Standard for the Approved Classification of Growing Areas ~~Affected by Point Sources~~ when Evaluated for Adverse Pollution Conditions. Chapter IV, @.02 F. Standard for the Approved Classification of Growing Areas ~~Affected by Nonpoint Sources~~ when Evaluated for Nonpoint Sources. (1) Exception. If the tidal stage increases the fecal coliform concentration, the authority shall use sample results collected during that tidal stage to classify the area. (2) Pollution Sources. Growing areas shall be~~:~~ ~~(a)~~ Impacted only by randomly occurring, intermittent events~~; and~~ ~~(b) Not impacted by discharges from sewage treatment facilities or combined sewer overflows.~~ Chapter IV, @.02 G. Standard for the Restricted Classification of Growing Areas ~~Affected by Point Sources~~ when Evaluated for Adverse Pollution Conditions and Used as a Shellstock Source for Shellstock Depuration. Chapter IV, @.02 H. Standard for the Restricted Classification of Growing Areas ~~Affected by Nonpoint Sources~~ when Evaluated for Nonpoint Sources and Used as a Shellstock Source for Shellstock Depuration
13. Public Health Significance	This proposed amendment to Chapter IV, @.02 updates the conditions under which

	the APC and SRS methods may be used. The proposal allows the use of the SRS method in areas impacted by discharges from sewage treatment facilities or combined sewage overflows where marine water stations have been placed to monitor nonpoint pollution. The intent of this proposal is to use the sampling methodology and statistical analysis most acceptable for the purpose of the marine water sampling station. If the station is placed to monitor nonpoint pollution, the SRS methodology should be used. If the station is placed to monitor adverse pollution conditions, the APC methodology should be used. In Washington state, marine water stations located in Conditionally Approved areas impacted by wastewater treatment plants are placed to monitor nonpoint pollution from the surrounding upland areas. The APC criterion is used to sample and evaluate data from these stations with the adverse condition defined as an upset at the treatment plant. Many wastewater treatment plants are high performing and upset conditions occur infrequently. The infrequency of the impact to the growing area does not allow for the intended use of the APC sampling strategy. Hydrographic studies and dilution analyses are more appropriate for the evaluation of the impact area around high performing wastewater treatment plants.
14. Cost Information	No impact