Proposal No. 19-119

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	Reduced marine water sampling in conditionally approved areas impacted by point sources
11. Specific NSSP Guide Reference	Section II. Model Ordinance Chapter IV. Shellstock Growing Areas @.03 Growing Area Classification C3. Reevaluation of Conditional Classification(b)(ii)
12. Text of Proposal/ Requested Action	Section II Model Ordinance Chapter IV Shellstock Growing Area @.03 Growing Area Classification C3. Reevaluation of Conditional Classification (b) Water Sample Collection (ii) When the conditional management plan is based on the operation and performance of a WWSD (s); combined sewer overflows(s); or other point sources of pollution, monthly water samples are required when the growing area is in the open status of its conditional classification except when: (a) Hydrographic or dilution analysis has been completed to determine the impact of a performance failure; and (b) Communication requirements are documented and the WWSD operator provides immediate notification to the Shellfish Authority during a performance failure.
13. Public Health Significance	This proposed amendment to Chapter IV, @.03C3(b)(ii) updates the requirements related to the monthly sampling requirement in Conditionally Approved areas classified based on the operation and performance of a WWSD, combined sewer overflow, or other point source. The proposal allows the Shellfish Authority to reduce the number of marine water samples in the area from monthly to five or six times per year, based on the sampling methodology used, if additional studies and appropriate communication channels have been developed. Based on the high performance of many treatment plants, upset conditions occur infrequently and are not evaluated through the placement of permanent marine water sampling stations. Dye and drogue studies coupled with computer modelling are commonly used to determine the potential impact from a point source of pollution on the growing area and are used to calculate the dilution available throughout the area. In Washington state, all NPDES permits issued to wastewater treatment plants contain requirements for operators to provide immediate notification to the Shellfish Authority during upset conditions. Failure of the operator to respond in a

	timely fashion could result in a significant penalty. Upset conditions impacting Conditionally Approved shellfish growing areas in Washington State are infrequent; however, during each event the Shellfish Authority has been immediately informed. The high performance of current treatment plants, effective use of hydrographic and dilution analysis, and immediate communication during upset conditions provide more effective and efficient protection of public health in Conditionally Approved areas impacted by point sources. Upset conditions are infrequent and random which can make monthly sampling inefficient and ineffective at evaluating impacts from the point source.
14. Cost Information	The reduced sampling option would be a cost savings for the Shellfish Authority.