Proposal No. **23-205**

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Proposal Subject	Recirculating Wet Storage Water Quality Threshold
Specific NSSP Guide Reference	Section II Model Ordinance – Chapter VII. Wet Storage in Approved and Conditionally Approved Growing Areas Section .04 Wet Storage in Artificial Bodies of Water (Land-Based) C.Wet Storage Source Water (1) General. (3) Recirculating Water System. Section IV Guidance Documents – Chapter III. Harvesting, Handling, Processing, and Distribution .05 Protocol for Addressing Positive Coliform Sample in an Artificial Wet Storage Water Body
Text of Proposal/ Requested Action	Section II Model Ordinance – Chapter VII. Wet Storage in Approved and Conditionally Approved Growing Areas Section .04 Wet Storage in Artificial Bodies of Water (Land-Based) C.Wet Storage Source Water (1) General. (f) Disinfected process water entering the wet storage tanks shall have ~~no detectable levels~~ less than or equal to 2 cfu/100ml of the coliform group as measured by an approved NSSP method appropriate for UV process water and follow the protocol of the Decision Tree (Section IV. Guidance Documents Chapter III. .05) (g) When the laboratory analysis of a single sample of disinfected process water entering the wet storage tanks shows ~~any~~ a ~~positive~~ result above 2 cfu/100ml for the coliform group daily sampling shall be immediately instituted until the problem is identified and eliminated. (h) When the problem that is causing disinfected process water to show positive results above 2 cfu/100ml for the coliform group is eliminated, the effectiveness of the correction shall be verified on the first operating day following correction through the collection, over a twenty-four (24) hour period, of a set of three (3) samples of disinfected process water. (3) Recirculating Water System. (b) Once sanctioned for use, the recirculating process water system shall be sampled weekly to demonstrate that the disinfected water is ~~negative~~ less than or equal to 2 cfu/100ml for the coliform group. (c) The dealer shall inspect and/or clean the system if a weekly sample tests positive for the coliform group, but is less than or equal to 2 cfu/100ml.

	~~(c)~~ (d)When make-up water of more than ten (10) percent of the process water volume in the recirculating system is added from a growing area source classified as other than approved, a set of three (3) samples of disinfected water and one (1) sample of the source water prior to disinfection shall be collected over a twenty-four (24) hour period to reaffirm the ability of the system to produce process water with less than or equal to 2 cfu/100ml for the coliform group ~~free from the coliform group or viable bacteria~~. ~~(d)~~ (e)When ultra-violet treatment is used as the water disinfectant, each time a bulb change is required either to replace a burned out bulb or for servicing, new ultraviolet bulbs shall be installed and old bulbs discarded, and the weekly disinfected process water sample shall be collected and analyzed. Section IV Guidance Documents – Chapter III. Harvesting, Handling, Processing, and Distribution .05 Protocol for Addressing Positive Coliform Sample in an Artificial Wet Storage Water Body If the water sample is ~~positive~~ above 2 cfu/100ml for coliforms in the recirculating system, institute daily sampling.
Public Health Significance	The NSSP regulations for wet storage allow for flow through systems in approved waters without disinfection. However, recirculating wet storage systems in the US currently need to meet a zero coliform threshold for weekly process water tests to meet NSSP regulations. When the laboratory analysis of a single sample of disinfected process water entering the wet storage tanks shows any positive result for the coliform group, daily sampling must be immediately instituted until the problem is identified and eliminated. This is a significant burden on the industry and the shellfish laboratories. This proposal would change the trigger for daily testing to samples that exceed 2 cfu/100ml. This does not reduce public health protections and requires the dealer to inspect and/or clean the system if a sample comes back positive but less than or equal to 2 cfu/100ml. This proposal does not eliminate~~eleiminte~~ the need for the system to be initially verified by testing negative for the coliform group under normal operating conditions. Justification for this proposal is partly based on the Canadian recirculating~~recirulating~~ wet storage process water quality threshold of ≤ 2cfu/100ml which is found in the Canadian Shellfish Sanitation Program manual.
Cost Information	This proposal will result in significant cost savings for the dealers in collecting and shipping daily samples as well as the laboratory in processing unnecessary samples when 2 or less cfu/100ml is observed in process waters.
Action by Task Force II, 2023	Recommends sending Proposal 23-205 to appropriate committee as determined by the conference chair.
Action by 2023 General Assembly	Adopted recommendation of Task Force II on Proposal 23-205
Action by FDA July 7, 2023	Concurred with Conference action on Proposal 23-205