Proposal No. **23-206**

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Proposal Subject	Wet Storage Sampling Requirements
Specific NSSP Guide Reference	Section II Model Ordinance. Chapter VII. Wet Storage in Approved and Conditionally Approved Growing Areas. .04 (C)(3) Recirculating Water System
Text of Proposal/ Requested Action	(3) Recirculating Water System. (a) A study shall be required to demonstrate that disinfection for the recirculating system can consistently produce water that tests negative for the coliform group under normal operating conditions. The study shall meet the requirements in Section C. (2) (b) above. (b) Once sanctioned for use, the recirculating process water system shall be sampled weekly to demonstrate that the disinfected water is negative for the coliform group (c) If the recirculating process water system passes (20) consecutive weekly samples, monthly sampling can be initiated. If a monthly sample fails, weekly sampling will resume until twenty (20) consecutive weekly samples demonstrate that the disinfected water is negative for the coliform group. (d) If the recirculating process water system passes twelve (12) consecutive monthly samples. Quarterly sampling can be initiated. If a quarterly sample fails, weekly sampling will resume until twenty (20) consecutive weekly samples demonstrate that the disinfected water is negative for the coliform group. (e) 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 free from the coliform group or viable bacteria. (c)(f) When ultraviolet 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.
Public Health Significance	Many wet storage facilities only operate a few days a week and may only have shellfish products in the wet storage system for a few hours, with potentially different products in the system on a daily basis. Weekly sampling for these recirculating systems is excessive and does not provide an accurate accounting as to whether a facility is going to have a sample failure. We propose a tiered sampling system for facilities that have a history of passing water samples and accounts for what to do when a sample does fail for Total Coliform.

Cost Information	There is significant cost to the shellfish wet storage facilities to overnight samples to a certified lab, in addition to the cost for the sampling and shipping supplies. Additionally, extra costs are incurred by the certified laboratories that have to run more samples.
Action by Task Force II, 2023	Recommends sending Proposal 23-206 to the appropriate committee as determined by the conference chair.
Action by 2023 General Assembly	Adopted recommendation of Task Force II on Proposal 23-206.
Action by FDA July 7, 2023	Concurred with Conference action on Proposal 23-206.