Proposal No. **23-213**

Submitter	Maxwell Rintoul
Affiliation	Hog Island Oyster Co.
Address Line 1	PO Box 829, 20215 Hwy1
City, State, Zip	Marshall, CA, 94940
Phone	(860) 372-0312
Email	max.rintoul@hogislandoysters.com
Proposal Subject	Proposal For Clarifying Product Loading Rules During Validation Study of Artificial Wet Storage Systems
Specific NSSP Guide Reference	Chapter 7 .04 C Wet Storage Source Water
Text of Proposal/ Requested Action	The purpose of the Validation study for a Wet Storage system is to demonstrate the ability of the System to properly disinfect the water from all coliforms. The Model ordinance states that this Study should be done under "Normal operating conditions" per Chapter 7 .04 C 3a. For our Artificial Wet Storage System, normal operating conditions means product being taken out, and new product going into the system on a daily basis. To fully test the ability of the system to disinfect from coliforms during a validation study new product would have to be cycled in and out. However, there is no guidance in the model ordinance on the loading of product in the tanks, only the sampling procedure. It seems that Normal Operating Conditions have been interpreted differently by state authorities. Some authorities have the thought that tanks should be fully loaded, and no product should be removed for the duration of the study. The reason for not removing product being the system should always be at max load and removing product for any period would reduce the potential load the system would have to disinfect. It is our belief that removing products and adding new products increases the potential coliform group load by introducing animals that are harboring more potential coliforms. Allowing for removal and adding of new products during the Validation Study is more representative of the maximum number of animals a Wet Storage system would experience. This is what 'Normal Operating Conditions' would mean for us; we are asking for clarification and guidance on Normal Operating Conditions for Land-Based Recirculating Wet Storage Systems.
Public Health Significance	Ensuring artificial wet storage systems are validated under their maximum load as they would during 'Normal Operating Conditions'.
Cost Information	Potential cost increases for Authorities and Shippers. More product used in the validation study would lead to increases in traceability documents on the authorities side. More product needed for the validation study on the Shipper's side.
Action by Task Force II, 2023	Recommends no action on Proposal 23-213 to the appropriate committee as determined by the conference chair.
Action by 2023 General Assembly	Adopted recommendation of Task Force II on Proposal 23-213
Action by FDA July 7, 2023	Concurred with Conference action on Proposal 23-213