



## **Dockton Water Association**

9710 SW WINDMILL ST  
Vashion, WA 98070

July 21, 2022

Richard Rodriguez  
Department of Health  
Northwest Drinking Water Regional Operations  
20425 72<sup>nd</sup> Avenue South, Suite 310  
Kent, WA 98032-2388

Re: Small Water System Management Program 2013 Submittal (13-0317 SWSMP)

Dear Mr. Richard Rodriguez:

Thank you for your patience as we have gathered information to respond to your comments on May 29, 2013 and Ecology's comments dated April 4, 2013 regarding the Small Water System Management Plan (SWSMP). We have enclosed the updated SWSMP planning document for your review and approval. This letter addresses outstanding comments we are aware of from Health and Ecology on the plan.

### **Health letter dated May 29, 2013, Re: Small Water System Management Plan, Submittal 13-0317**

Comment #1: "Provide a short summary of existing facilities and how they operate in Section 1-2. Include information regarding existing sources, reservoirs, booster pump stations, control valves, distribution piping and treatment."

Answer: Done. See updated section 1.2 of the SWSMP.

Comment #2: "Continue to work on your Cross Connection Control Program and Wellhead Protection Program, both of which are required under WAC 246-290. Please keep the Department apprised of progress on the schedule submitted in Sections 1-4 and 1-5, respectively."

Answer: Done. See updated sections of 1-4 and 1-5 of the SWSMP.

Comment #3: "Update DOH contact information Section 1.6/3."

Answer: Done. See updated sections of 1.6 of the SWSMP.

Comment #4: "Update your coliform monitoring plan to include a map showing routine and repeat sampling locations. Also, clarify language for repeat samples. We would not recommend you sample the Sandy Shores Well if it has not been in use. Also, if you use the raw water sample at Dockton Springs as your 4th repeat sample; you might run the risk of getting a non-



acute MCL violation. It might be better to take a fourth sample in the distribution system and mark your GWR sample as a 'raw'.

Answer: See coliform monitoring plan and figure in Appendix F of the enclosed SWSMP.

Comment #5: Incorporate Stage2 DBP sampling requirements into 2-3.

Answer: See coliform monitoring plan and figure in Appendix F and Water Quality Monitoring Schedule in Appendix O of the enclosed SWSMP.

Comment #6: Please address the issues contained in the April 4, 2013 letter from Department of Ecology.

Answer: Done. See separate response below.

Comment #7: Dockton's annual water use efficiency reports for 2010 and 2011 report distribution system leakage of 26.6% and 21.3%, respectively. Have you initiated a water loss control action plan and are these activities included in your financial operating budget?

Answer: The most recent three-year rolling average for water loss is 9%, which is below the 10% limit. Therefore, a water loss control action plan is not required. See section 2.9 of the SWSMP.

Comment #8: You may wish to consider including design and construction standards for distribution main replacements, given your capital improvement schedule (CIP) contains a number of main replacement projects. For any new projects not included in a previous or current CIP; you must submit a project report/construction documents to DOH for review and approval.

Response: Not done. We do not currently have plans to develop standard construction documents due to funding constraints.

**Ecology letter dated April 4, 2013, Re: DWA SWSMP ID#19550; ODW #13-0317**

Comment #1: The Water Right Self-Assessment (WRSA) does contain the following errors in the designation of the water rights:

Comment			DWA Response
Number shown in the WRSA		Correct No.	
Water Right Claim	17023762	173023702	Water Right Claim number 173023702 is associated with source S01 (Dockton Springs) and certificates S1-23804C and S1*10800C listed on the updated Water Right Self-Assessment form (WRSA).
Water Right Certificate	5739	5383	Water Right Certificate 5383 is associated with source S02 (Sandy



			Shores) and certificate G1*06019C listed on the updated WRSA.
Water Right Certificate	2537	6734	Water Right Certificate 6734 is associated with source S03 (Hake Springs) and certificate S1-20464C (inactive) not listed on the updated WRSA.

Response: See our responses in table above. In addition, copies of the certificates are in Appendix G and an updated Water Right Self-Assessment Form is in Appendix H of the enclosed SWSMP. Due to water quality issues, the infrastructure associated with Hake Springs (well, cistern, and booster station) were disconnected from the system and have not been use for over ten years.

Comment #2: In addition, the association should provide the 6-year and 20-year forecast Water Right Self-Assessment (WRSA) forms.

Response: Short and long-term forecasts are no longer required on the Water Right Self-Assessment forms for Small Water System Management Plans. To answer this question, a capacity analysis was performed to determine short and long-term water right requirements and compared them to existing rights. See Table 10 and 20-Year Forecasted Water Rights Status on page 13 of the Technical Memo in Appendix T of the enclosed SWSMP.

**Health Routine Sanitary survey Report dated June 8, 2018 (Excerpts Directly Relating to the SWSMP)**

Outstanding Comment from previous survey [4/1/2013]: “In the next Water Use Efficiently (WUE) Report identify your goal and report progress on achieving your goal.

Answer: Complete. As required, we submit annual WUE reports. The 2021 three-year annual average for the system is 9%, below the 10% threshold. The last public forum to establish the WUE goal was 6/4/2021. See section 2.9 of the enclosed SWSMP.

Outstanding Comment from previous survey [4/1/2013]: “Develop and implement a Source Water Protection Plan.”

Response: Ongoing. See updated section of 1.5 of the SWSMP.

**Health letter dated June 13, 2018, Re: Routine Sanitary Survey 2018 (Excerpts Directly Relating to the SWSMP)**

Comment #6: “Continue to develop the wellhead protection program. Please see Department publication 331-106 Source Water Protection Requirements for more information.”

Response: Ongoing. See updated section of 1.5 of the SWSMP.

Comment #7: “Update cross-connection control program (CCCP) as needed in order to meet the objectives of the Association. Board of Directors must approve the CCCP to give the Association



legal authority to implement. I recognize the current efforts to educate consumers and to collect information on the types of hazards present in the system.”

Response: CCC program approved by the Association. See updated section of 1.4 of the SWSMP.

Comment #8: “What level of reliability do customers expect? The 520 booster pump station is the sole source of supply to the 520 pressure zone. Consider adding emergency power to improve system reliability in the 520 pressure zone.”

Response: Complete. Backup power and automatic transfer switch installed in 2020. See section of 1.2 of the updated SWSMP for a list of improvements to the system since the WSP amendment was approved in 2005.

Comment #9: “Practice good technique for measuring chlorine residual (written guidance provided in separate correspondence).”

Response: See coliform monitoring plan and figure in Appendix F and Water Quality Monitoring Schedule in Appendix O of the enclosed SWSMP.

Comment #10: “Follow up with review comments for the Small Water System Management Program submitted to the Department in 2013 for approval (guidance for next steps provided in separate correspondence).”

Response: See updated SWSMP enclosed.

Thank you for your constructive comments on our 2013 Small Water System Management Plan and in the 2018 Routine Sanitary Survey. Please let us know if you have any further questions or comments.

Regards,

7-21-22

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cc: Brietta Carter