



DATE: December 29, 2025

TO: Kathleen Buchli, Code Reviser

FROM: Tami Thompson, Regulatory  
Affairs Manager

A handwritten signature in black ink that reads 'Tami M. Thompson'.

SUBJECT: Rescind Interpretive Statement | When Problem Systems are Required to Submit a Water System Plan or a Small Water System Management Program Filed as WSR 00-07-082

This memo serves as notice that the Department of Health (department) is rescinding an interpretive statement titled “When Problem Systems are Required to Submit a Water System Plan or a Small Water System Management Program” filed March 15, 2000, and published as WSR 00-07-082.

This statement provided guidance to staff when to require the submittal of a water system plan or a small water system management program for systems that previously were not required to submit a planning document. The department is rescinding this interpretive statement because it is outdated and does not reflect current business practices.

Individuals requiring additional information on this should contact Mike Means, Water Quality, Policy, and Certification Manager for the Office of Drinking Water at [mike.means@doh.wa.gov](mailto:mike.means@doh.wa.gov).

Thank you for your attention to this matter.

cc: Mike Means, Water Quality, Policy, and Certification Manager

OFFICE OF THE CODE REVISER  
STATE OF WASHINGTON  
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WSR 26-04-057



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
DIVISION OF DRINKING WATER  
*Airustrial Center, Bldg. 3 • P.O. Box 47822 • Olympia, Washington 98504-7822*  
*TDD Relay 1-800-833-6388*

**Memorandum**

March 3, 2000

TO: Interested Parties  
FROM: Gregg Grunenfelder *MM*  
SUBJECT: Interpretative Statement Summary

**Title of Interpretive Statement:**

When Problem Systems are Required to Submit a Water System Plan (WSP) or a Small Water System Management Program (SWSMP).  
Sections: WAC 246-290-100(2)(c) & -105(3)(b)

**Issuing Entity:** Alan Rowe, Operations Manager  
Division of Drinking Water

**Description of Subject Matter:**

Direction is provided to staff as to when to require submittal of a water system plan or a small water system management program for systems that previously were not required to submit a planning document. Examples of documented problems that could trigger the planning requirement are identified. The final decision of requiring the submittals rests with the Regional Managers.

**Division Contact:** Ethan Moseng  
Division of Drinking Water  
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**Effective Date:** February 29, 2000

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# Consistency Statement

February 29, 2000

**Topic:** When Problem Systems are Required to Submit a Water System Plan (WSP) or Small Water System Management Program (SWSMP)  
Sections: WAC 246-290-100(2)(c) & -105(3)(b)

**Issue/Question:** WAC 246-290-100 allows staff to require submittal of a WSP from "any system experiencing problems related to planning, operation, and/or management as determined by the department." WAC 246-290-105 allows staff to require submittal of a SWSMP when "an existing system has operational, technical, managerial, or financial problems, as determined by the department." For the sake of consistency, direction must be provided to staff as to when to require submittal of a WSP or a SWSMP.

**Discussion:** This consistency statement (CS) pertains to existing, non-expanding systems presently required to prepare but not necessarily submit a SWSMP. Expanding systems are required to submit WSPs, therefore any problems would be addressed in their WSP. To determine if a system must submit either a WSP or a SWSMP requires two distinct decisions: (1) Are the problems significant enough to require a planning document and, if so, (2) which planning document, a WSP or SWSMP, is more appropriate?

The type of planning document required will depend upon how the solution to the problem(s) will be developed. The SWSMP may be submitted in whole or in parts according to a department-approved schedule to address specific concerns. Depending on the problem(s) and proposed solution, DOH may also require a project report and/or construction documents addressing specific improvements.

## Decision:

- ◆ Any staff, with the regional planner, may present a situation to the Regional Manager for a decision.
- ◆ Documented "problem" systems that may be required to submit a planning document to DOH include:
  - (1) Systems in significant non-compliance (SNC) with any water quality program;
  - (2) Systems required to issue a boil water advisory;
  - (3) Systems identified as the source of a waterborne disease outbreak;
  - (4) Systems not meeting water quantity, and/or pressure requirements as identified through multiple consumer complaints and verified by regional office staff;
  - (5) Systems with a combination of MCL, treatment technique, and/or monitoring violations in more than one water quality program;
  - (6) Systems that don't meet requirements or expectations established by the local community, such as concerning secondary contaminants or reliability of supply;
  - (7) Systems with deficiencies documented in a sanitary survey (SS); or
  - (8) Systems with other problems documented by the Regional Manager.
- ◆ A SWSMP will normally be requested if the system intends to solve their problem(s) while maintaining the existing customer base.
- ◆ A WSP may be required when the system :
  - (1) has demonstrated the inability to satisfactorily prepare a SWSMP;
  - (2) expresses the need for substantial assistance warranting hiring a PE to develop a plan; or
  - (3) intends to expand their customer base in order to help pay for or facilitate the improvements needed to solve their problem(s).

"This Consistency Statement is provided as guidance to regional office staff to ensure consistent implementation of DDW program elements. Decisions by DDW staff to grant /deny an approval, or to take enforcement action, must be based on an RCW or WAC."