

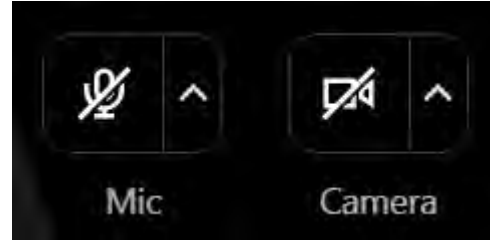


Project Process & Exemption Criteria

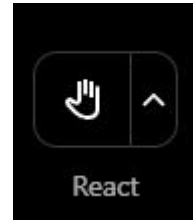
September 1, 2026

Online Tools

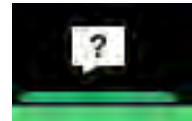
Muted (bottom, middle)



Raise hands (bottom, left)



Use the Question Tool (top, right)



Agenda

- Housekeeping Items
- Team and Project Introductions
- Summary of Technical Sessions
- Today's focus: Administrative Rules and Licensing
 - What we have heard and observed
 - What gaps have been identified
 - Discussion questions
- Call for Outstanding Topics
- Next steps and Close Out



Tips for a Good Meeting

- Share from your experience and perspective
- Please listen when others are speaking
- Allow space for all to participate
- Be generous
- We ask that all present be respectful and kind and we believe that this will lead to good outcomes



What is the Minimum Design Criteria Rule (MDCR) Update?

MDCR will update 18 A.A.C. 5, Article 5 design criteria and associated rules, replacing existing requirements that reflect outdated **1978 standards** and practices.

Key Benefits



Improve **regulatory clarity** across criteria



Ensure robust **public health protections**



Modernize to **current industry practices**



Align with **Safe Drinking Water Act** requirements

Bulletin 8

Disinfection of Water

Bulletin 10

Construction
Guidelines

New PWS
Minimum Design
Criteria

Your Voice Matters!

Take our survey and visit our site to keep up with our project progress.



bit.ly/4m8jZv9



bit.ly/4sRiPLa



Minimum Design Criteria for Public Water Systems and Related Infrastructure

Revised On: Feb. 10th, 2026 - 08:49 am

Summary:

ADEQ intends to update its public water system design and application process rules in 18 A.A.C. 5, Article 5, Minimum Design Criteria for Public Water Systems.

- Article 5: Minimum Design Criteria for Public Water Systems | [View Article 5 >](#)

ADEQ's rules for public water system Minimum Design also include Engineering Bulletins 8 and 10 via incorporation by reference in A.A.C. R18-5-502:

- Engineering Bulletin 8 — Disinfection of Water Systems | [View Bulletin 8 >](#)
- Engineering Bulletin 10 — Guidelines for the Construction of Water Systems | [View Bulletin 10 >](#)

The Minimum Design Criteria Guidelines (Engineering Bulletin 10) and rules for public water systems and related infrastructure in Article 5 currently reflect engineering standards and practices from 1978. The rules and incorporated technical requirements will be updated to reflect current industry standards and practices.

Rulemaking Website

azdeq.gov/rulemaking/minimum-design-criteria



More information and content to come (e.g., external survey).

Finding MDCR Webpage from the ADEQ Homepage (azdeq.gov)



Click on the “Laws/Rules/Policy” tab.



Laws/Rules/Policies

Click “View” under Active Rulemakings
([azdeq.gov/active-rulemakings](https://www.azdeq.gov/active-rulemakings))



Active Rulemakings

ADEQ maintains a list of active rulemakings | [View >](#)

Under the Water Quality subheading, click
on “View” next to Minimum Design Criteria
for Public Water Systems



Water Quality

- Drinking Water Rule Updates to Conform to Federal Requirements | [View >](#)
- [Minimum Design Criteria for Public Water Systems](#) | [View >](#)
- Nonpoint Source Discharges: Remediation of Abandoned Hardrock Mines, Inc.

Sources & Construction Session 1 Takeaways

KEY OBSERVATION

Attendees were excited about the first technical session and made many comments in chat and audio.

Include comparison between ADWR and ADEQ requirements

Discuss depth of sanitary seals, compliance sample taps, and like-for-like well pump changes.

Clarify source water classification (including AWP, ASR, GUDI), modification, reactivation, sampling, and closure.

Clarify backup power and floodplain requirements



Pump, Hydro-tank, & Storage Session 2

Takeaways

KEY OBSERVATION

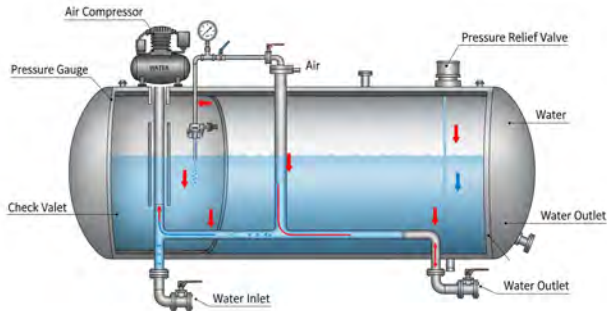
Overall received good feedback on pumping facilities, hydropneumatic and storage tanks (STs).

Include guidelines for physical and cybersecurity.

Define like-for-like evaluations, “water ST” vs “Chemical ST”.

Include schematics, subsurface ST, criteria for hydro-tank or surge tank.

Discussion on tank materials and ASME/NSF standards.



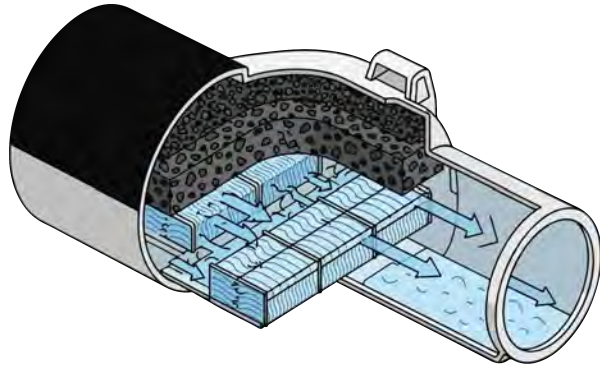
Treatment Session 3 Takeaways

KEY OBSERVATION

Overall did not receive as much feedback from stakeholders as in other engagement sessions.

Request for foundational criteria for when pilot testing, bench-scale testing, or other demonstrations are required.

Standardize methods for calculating blended finished water quality or finished water stability.



Several treatment approaches to be included/expanded, such as ozone contactors, UV disinfection, PFAS treatment, and biological treatment systems.

Include criteria for treatment technology or treatment unit approval packages.

Disinfection & Distribution Session 4 Takeaways

KEY OBSERVATION

Overall received very good feedback and active participation from attendees



Update guidance on types of disinfection technologies

De-mystify criteria for water line-utility crossings

Provide better chlorine gas safety and tank design direction

Clarify fire flow requirements and ADEQ's evaluation

Establish easier to follow disinfection guidelines for contractors

Provide guidance on corrosion control treatment and evaluations

Provide clarity around water demand calculation criteria

Today's Topics

01  **In-Kind Replacements**

02  **Streamlining Process**

03  **Exemptions**

04  **Adding "pre-AOC" Process**

05  **Rule Update Transition**

In-Kind Replacement Criteria (i.e., like-for-like)



What We Heard

- Clear definition of in-kind replacement needed.
- Permitting timeline and fiscal difficulties for small systems / rural systems.
- In-kind have not required permits, but interpretations differ on what qualifies as “in-kind” producing varying conclusions.



Identified Gaps

- In-kind replacements could include pumps and other appurtenances.
- Some flexibility around equipment requirements in permitting allows for easier repairs, and replacement.



Discussion Questions

- What components should qualify for in-kind replacements?
- Should these rules only apply to non-treatment in-kind components?
- What criteria should apply for each listed component category?
- Do you recommend standards from other states that are extremely clear?



ATC/ AOC Streamlining for Specified Project Types?

Concept

What does a “streamlined” application process mean to you?

Exemption Scope

What types of isolated projects shouldn't be exempted, but could be streamlined?

Pros & Cons

What are pros and cons of offering a streamlined review? (e.g., how much time could be saved)

Value Assessment

Ultimately, is there value in a streamlined process for specific isolated projects? *(In chat: Yes/No)*



What Information Is Needed in Streamlined Submittals?



Potential Information Exclusions

If streamlining for some specified projects has value:

- What analyses or information may safely be excluded from the application process?



Information Required to Submit

What information ***must*** be submitted to allow for sufficient review to protect public health for these isolated component projects?

- Liquid chlorinators
- Consecutive or interconnections
- Booster pumps
- POU/POEs (treating for secondary MCLs or aesthetics only)

Exemptions



What We Heard

- Monetary threshold for eligibility is too low
- “Structural” is a confusing term
- Lack of clarity, generally



Identified Gaps

- Project information and exact locations
- Simplicity, specificity, and clarity
- Public health protection criteria



Discussion Questions

- What exemptions should **not** be allowed?
- What types of projects pose the least risk to public health?
- Does project size matter?
- What characteristics should qualify a project for an exemption other than monetary thresholds?

Pre-AOC Steps: Testing & Operation



What We Heard

- Chicken or the egg situation: How to obtain an AOC while needing to run the system in order to get the data required to obtain the AOC
- As-builts can delay AOC applications



Identified Gaps

- Wasting water unnecessarily to obtain testing results
- Practical operational constraints in obtaining fire testing, bacteria and chlorine testing, and/or performance testing results



Discussion Questions

- Would a “pre-AOC” step be beneficial to balance commissioning realities with red tape?
- Could submitting short-term Validation Testing for early EPDS discharge help bridge the gap before full-scale Performance Testing is complete?

Rule Update Transition

Because the other rule changes are uncertain, we haven't broached this topic very much internally, but be aware we will be asking ourselves the following:

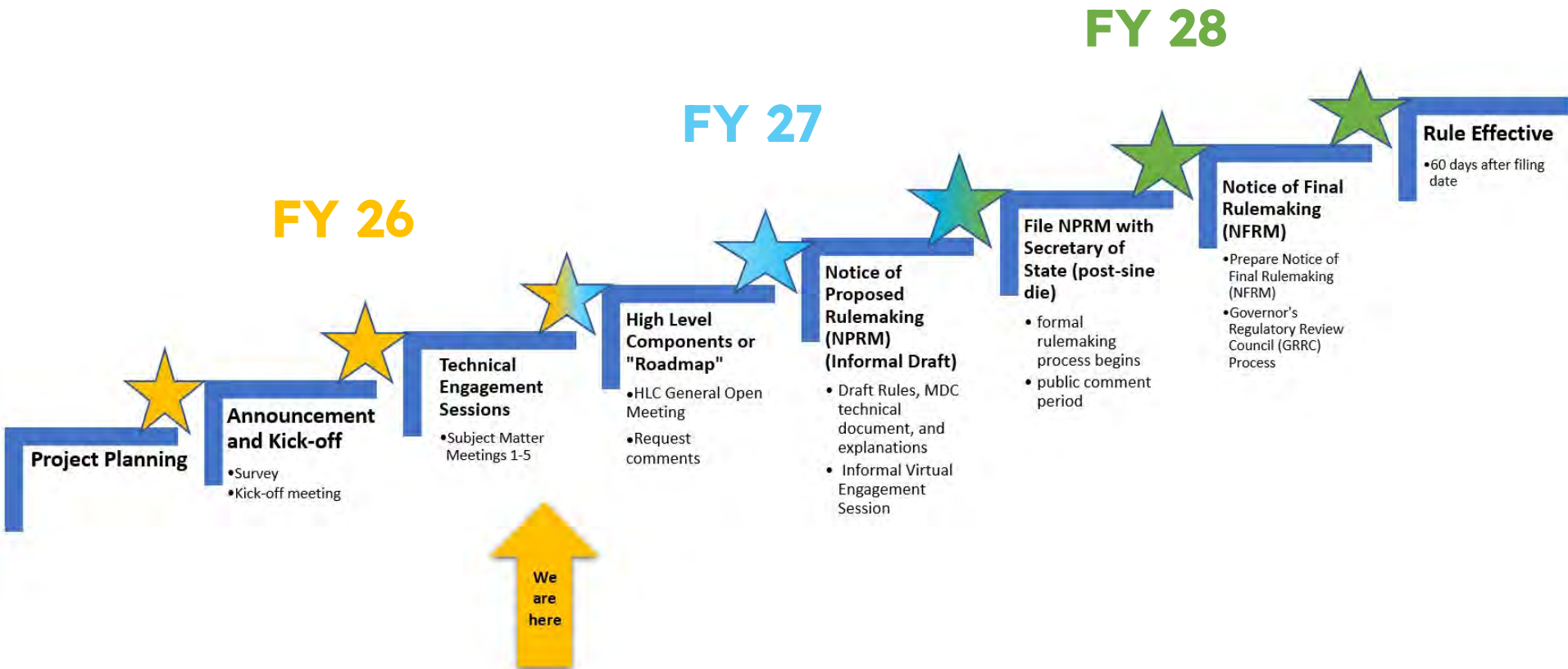
- How should rule transition work? For example:
 - Should there be a grace period?
 - What should trigger coming up to code?
- Do you think these standards should apply across the board, or are there specific systems where these rules might not make practical sense?



Photo credit: ADEQ

Outstanding Technical Topics for MDCR Update?

Project Timeline & Milestones



FY= Fiscal Year (July - June)

Thank You!

See you online in Q1 2027 — Stay tuned!

Next Steps



Survey Deadline

Survey will remain open until the High Level Components are released.

Scan or Click to Participate



bit.ly/4m8jZv9

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