

Andy Hooten

Any Line Numbers referenced below are based upon the Clean Version of the Proposed Rules.

General Comment - Rather than incorporating what Ten State Standards you want and excluding others at the beginning of a section, I would recommend placing the applicable TSS in the Section where it makes sense. The proposed format was difficult to follow and did not provide clear intent.

Line Number 2108-2109 – Section 14.h.v – It is suspected that these exist on private residence's service lines in the area and might be needed in the future depending on future development near the maximum water supply elevation of the system. How are we to proceed? Can these be allowed with proper backflow prevention inside a residential dwelling, or trigger a low hazard rating rather than a B (I)? How are these to be prevented as individual homeowners or contractors may not consult WDEQ standards prior to installation?

Line 2266 – Section 16.b – PE Pipe $\frac{3}{4}$ " – 3" pipe is incorporated via C901. Will AWWA C906 be addressed in this revision?

Line 2268 – Section 16.c – Flanged piping is not allowed. Have above-ground installations been considered in regards to this item, i.e. Creek crossings?

Line 2345-2346 – Section 16.k.v – Would having the sanitary sewer pipe be the same material as the water pipe be acceptable rather than a separate conduit pipe i.e. C900 for Sanitary Sewer Pipe (TSS 8.8.4.b)?

Line 2379-2380 – Section 16.k.vii.D – "may be" separated or "shall be" separated? I would suggest the following phrase, "when a pipe crossing is encased in flow-fill the minimum separation distance between the pipes shall be two inches, larger separations are encouraged".

Line 2382 – Section 16.l. "Table 1" and "Table 4" are referenced several times in 16.l. I assume all these references should be "Table 4". Please clarify.

Current Section 14.a.iv has been removed from the rules/regs – "All service connections shall be constructed in conformance with the Uniform Plumbing Code". Is there a replacement? I assume you intend to no longer allow copper service lines as copper is not listed in 16.b. Please clarify.

Service Lines. It is common, at this time, to install water service lines with SDR9 Poly and sanitary sewer services with SDR35. Several new home builders will change the SS service material to schedule 40 and install both services in the same trench, as allowed by Section P2906 of the 2018 IRC. Is it WDEQ's desire to continue the 10' separation of service lines or will reviewing agencies be able to determine if they desire schedule 40 pipe and single trenches? Which codes/rules/regs govern? Does WDEQ desire to adopt TSS 8.11?

Line 2704-2706 – Section 19.a.xiii AWWA C901 $\frac{3}{4}$ " through 3 inch for water service C-901-17. This has been updated to C901-20. Which version does WDEQ desire?