

## Jeffrey Rosenlund

Thank you for the opportunity to make comments on this important chapter of rules and regulations. My general comment pertains to incorporating the Ten State Standards as a reference. These standards appear to be referenced only partially and certain parts are excluded? I attempted to go through the rules I was most familiar with and it took a fair amount of effort to jump back and forth between the TSS and WYDEQ chapter 12.

The way these standards are incorporated will not make future updates of this chapter any easier. For example when new TSS are adopted, this chapter will require a total review and rewrite to get the correct sections incorporated.

It would seem best to either A: incorporate the entire TSS and only have a limited section to make your modifications to the TSS, or B: incorporate what you want from the TSS directly into Chapter 12 without reference to the TSS.

A few other things that should be fixed in these rules include:

1. requirement for a 24 mesh screen on tanks. This is quite small mesh for a northern climate like Wyoming, and will be quite costly. It is easy for this small of mesh to freeze over and completely block off, resulting in plugged vents, etc.
2. the requirement for a manhole to access valves at river crossings. This doesn't make sense in places where we've experienced creek crossings as the manholes would likely be under water. Having a valve in a manhole actually makes it harder to access a valve and close it than if it were in a valve box, especially if the area is flooded by a foot or two of water.

Thanks for the opportunity to comment!