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Water Quality Rules, Chapter 12, Water and Waste Advisory Board Meeting comment

1 message

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To: bseppie@jpwb.org

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Thank you for your comments on the Water Quality Rules, Chapter 12, Water and Waste Advisory Board Meeting. Your comments have been received.

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[Water Quality Rules, Chapter 12, Water and Waste Advisory Board Meeting](#)

Attachment(s):

Comments on Chapter 12.docx

Comments on Chapter 12, Water Quality Rules

General Statement:

Due to the size and complexity, the format of the proposed rules is challenging to use. Consider adding a table of contents illustrating each section and the associated page numbers. Because many sections have major sub-sections, these could be labeled as subheading and included in the table of contents.

The partial inclusion of specific Ten State Standards (by reference only) may lead to issues when interpreting and enforcing the standards. The user must cross reference back to specified sections of the TSS (in several instances only select portions of the TSS are referenced) . Consider incorporating the full text (with permission) of each included sections of the TSS directly into the appropriate subsections of Chapter 12. The verbiage will need to be modified to merge with the contents of the proposed rule. As the rule is proposed now, that “merging” will need to be made by the users and/or reviewer which may cause confusion.

Water treatment process design is very specific to the waters being treated. The use of pilot or demonstration plants is essential to most all surface water treatment plants of sufficient size. The cost and time associated with *successful* pilot studies must yield benefits to the design/permitting process. Consider bolstering Section 6 so that once a study has provided proven results, those findings are the basis for compliance with the potential conflicting requirements that may be more “generally” written.

Section 12 Treatment:

12. (h) Proprietary treatment systems often incorporate tube settlers. These systems may or may not require routine cleaning beyond normal “blowdowns” --- thus tube cleaning may only be an annual occurrence. These types of systems would not comply with 12. (h),(iv) as written.

12.(m) (ii)---missing or misnumbering??

12.(m) (iii) The use of Ozone may be driven by several factors depending on the process design/goals. Taste and Odor control may be a secondary or incidental benefit. When used as a pre-oxidant the dosage and contact time presented in (iii) is excessive and may be detrimental.

12. (r) &(s) Section 9.3,b of the TSS has not been included by reference. Without the inclusion of 9.3,b, the proposed Chapter 12 rules do not address land application of dewatered sludge except for the liquid lime softening sludge (see (r)(iv)).

Alum Sludge is specifically addressed in subsection (s) but sludge from ferric sulfate or ferric chloride is not. Consider including TSS section 9.3 b, it is an appropriate method to be considered: dependent on-site specific conditions.

Section 14 Pumping Facilities:

14.(d),(iii) Six air changes an hour is excessive in a pump station where sensitive electrical gear is in a segregated/isolated room. Consider allowing exceptions where applicable.

14.(g),(iii) Pump and pipeline design must consider surge. Pressure relief valves may provide the appropriate level of protection for some designs. Categorically excluding relief valves should be reconsidered.

Section 16 Distribution Systems:

16. (a) The proposed Chapter 12 does not include TSS 8.5 which provided a method to address inflow prevention (via AWWA C514). Consider including this section of the TSS.

16. (f) Air relief and Vacuum Breakers are essential in most large transmission systems. It is not always practical to provide segregated vent piping to the surface (ex. within paved areas). Alternate designs to drain the vaults or add inflow preventors need to be considered.