



Gina Thompson <gina.thompson@wyo.gov>

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## Water Quality Rules Chapter 3 for Environmental Quality Council Hearing 22-3101 comment

1 message

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noreply@smartcomment.com <noreply@smartcomment.com>

Mon, May 23, 2022 at 10:25 AM

To: [tourney.seth@epa.gov](mailto:tourney.seth@epa.gov)

Bcc: [gina.thompson@wyo.gov](mailto:gina.thompson@wyo.gov)

Thank you for your comments on the Water Quality Rules Chapter 3 for Environmental Quality Council Hearing 22-3101. Your comments have been received.

**Name:** Seth Tourney

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**Submitted By:** US EPA Region 8

### Water Quality Rules Chapter 3 for Environmental Quality Council Hearing 22-3101

The proposed Chapter 3 regulations do not require applicants to submit as-constructed record drawings to Wyoming DEQ after a permitted project is constructed. It is acknowledged that statements of completion are described with each general and individual permit issued; however, Chapter 3 should formalize and require this as-built verification process. The proposed Chapter 3 Section 12(f) discusses the procedure for the permittee to request a deviation from the plans submitted with the permit application; however, the permittee is not required to submit documentation that the project was constructed according to the permit application, plans and specifications.

Why is this a concern:

Requiring a submittal of as-built drawings would help to ensure that projects are built in accordance with the permitted design, plans and specifications. EPA has observed several water facilities that were not constructed according to the permit, resulting in EPA identifying significant deficiencies that must be corrected. Additionally, Wyoming DEQ would be adequately informed about partially constructed drinking water projects and ensure adequate public health protection.

Suggested remedy for the concern:

Add a citation requiring all permitted construction projects to provide Wyoming DEQ with an engineer's certification and as-constructed plans and specifications to document the final project constructed.

## US EPA Region 8

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