

Water and Waste Advisory Board Comments
December 21, 2021 Meeting
Chapter 12

General Comments

Lorie Cahn: Ms. Cahn asked if Chapter 12 needs to include definitions of all of the terms of the 2018 Ten States Standards.

Department Response: WDEQ/WQD considered the comment. The 2018 Ten States Standards do not include a section of definitions. However, based on our review of the 2018 Ten States Standards, we do not feel any additional definitions are necessary at this time.

5(u)

Lorie Cahn: Ms. Cahn recommended revising “mechanically driven drives” to “mechanical drives.”

Department Response: WDEQ/WQD revised the passage as requested.

5(x)

Lorie Cahn: Ms. Cahn noted the defined term “offstream reservoir” is defined, but is not used in the chapter. Ms. Cahn asked WDEQ/WQD to provide the number of offstream reservoir facilities in the State.

Department Response: WDEQ/WQD considered the comment. As the term “offstream reservoir” is not used in the chapter, WDEQ/WQD proposes to remove it from Section 5.

WDEQ/WQD consulted our database and EPA records and found that there are between 4 and 20 offstream reservoirs that are permitted in Wyoming.

5(cc)

Lorie Cahn: Ms. Cahn recommended revising “utilizing” to “use.”

Department Response: WDEQ/WQD revised the passage as requested.

6(b)(iii)

Lorie Cahn: Ms. Cahn recommended revising the stricken “which” to “that” and removing “that” from “that the facility will meet...”

Department Response: WDEQ/WQD revised the passage as requested.

8(c)(ii)

Lorie Cahn: Ms. Cahn noted the passage may be missing helpful grammar and punctuation, such as an “and” before “material” and a comma if “material” does not go with “valve.” Ms. Cahn recommended removing the comma after “valves.”

Department Response: WDEQ/WQD revised the passage as follows:

(ii) Profiles of all water lines shall: ~~be shown on the same sheet as the plan view at legible horizontal and vertical scales, with a profile of existing and finished surfaces, pipe size and material, valve size, material and type. The location of all special features such as access manholes, concrete encasements, casing pipes, blowoff valves, and air-vacuum relief valves, etc., shall be shown.~~

(A) ~~be~~ Be shown on the same sheet as the plan view at legible horizontal and vertical scales;

(B) ~~with~~ Show a profile of:

(I) ~~e~~ Existing and finished surfaces;

(II) ~~p~~ Pipe size and material; and

(III) ~~v~~ Valve size, material, and type.

(C) ~~the~~ Show ~~the~~ location of all special features such as access manholes, concrete encasements, casing pipes, blowoff valves, and air-vacuum relief valves ~~shall be shown.~~

8(c)(iii)(A)

Lorie Cahn: Ms. Cahn noted that the passage is unclear and requested that WDEQ/WQD explain how the passage will be clarified.

Department Response: WDEQ/WQD has revised the passage as follows:

~~(formerly Section 7(c)(iii)(A))~~ (A) The bottom of the stream, the elevation of the high- and low water levels, and other topographical features at ~~all locations where the water line is near or crosses streams or lakes.~~ points where:

and

(I) The water line is within 10 feet of streams or lakes;

(II) The water line crosses streams or lakes.

8(e)(ix)

Lorie Cahn: Ms. Cahn noted the passage is unclear concerning the depth of the elevation. The passage does not specify how far below the penetration the applicant should be in providing the elevation.

Department Response: WDEQ/WQD has revised the passage as follows: Provide from the ground surface to the total depth of the drilled borehole to include the elevation and designation of geological formations, water levels, formations penetrated, and other details to describe the proposed well completely;

8(e)(ii), line 1126 (11/5/21 strike/underline)

Lorie Cahn: Ms. Cahn noted the paragraph is unclear.

Department Response: WDEQ/WQD has clarified the passage as follows:

When applicable, ~~T~~he type, size, strength, operating characteristics, rating or requirements for all mechanical and electrical equipment, including machinery, valves, piping, electrical apparatus, wiring, and meters; laboratory fixtures and equipment; operating tools; special appurtenances; and chemicals, ~~when applicable.~~

8(e)(x)

Lorie Cahn: Ms. Cahn recommended removing the “and” after “screen intervals;”

Department Response: WDEQ/WQD revised the passage as requested.

9(b)(iv)

Lorie Cahn: Ms. Cahn requested that WDEQ/WQD review the passage and clarify “all” since some information may not be known at the time the application is submitted.

Department Response: WDEQ/WQD revised the passage to the following:

A determination of the degree of hazard of all [known or anticipated](#) water service connections to be connected to the proposed project. A hazard classification shall be identified for each connection and recommended mitigation measures shall be described for each hazard.

9(f)(ii)

Lorie Cahn: Ms. Cahn recommended revising “this data” to “these data.”

Department Response: WDEQ/WQD revised the passage as requested.

10(b)

Lorie Cahn: Ms. Cahn recommended adding “that” to “shall demonstrate the.”

Department Response: WDEQ/WQD revised the passage as requested.

10(b)(ii)

Lorie Cahn: Ms. Cahn recommended clarification of the passage.

Department Response: WDEQ/WQD revised the passage to “The plant capacity design shall ~~include documentation of the~~ demonstrate consideration of:”

10(b)

Lorie Cahn: Ms. Cahn recommended adding “that” to “demonstrate the facility will.”

Department Response: WDEQ/WQD revised the passage to “demonstrate that the facility will...”

11(e)(ii)(C)

Lorie Cahn: Ms. Cahn recommended adding “in” to “required Tables 1 and 2 of this Section.”

Department Response: WDEQ/WQD revised the passage to “required in Tables 1 and 2...”

11(e)(vii)(E)

Lorie Cahn: Ms. Cahn recommended removing “;” and “and.” Ms. Cahn recommended replacing the stricken characters with “.” after “annular space.”

Department Response: WDEQ/WQD revised the passage as requested.

11(e)(vii)(E)(II)

Lorie Cahn: Ms. Cahn requested that WDEQ/WQD review the passage at 11(e)(vii)(E)(II) and determine if “the” is necessary to “the 40 CFR Part 141.”

Department Response: WDEQ/WQD removed “the.”
11(e)(xxvi)

Lorie Cahn: Ms. Cahn recommended removing “an.”

Department Response: WDEQ/WQD revised the passage as requested.

12(b)

Lorie Cahn: Ms. Cahn recommended revising the passage back to the original language.

Department Response: WDEQ/WQD revised the passage to “The capacity of the water treatment or water production system shall be designed for the maximum daily demand at the design year.”

12(e)(vi)

Lorie Cahn: Ms. Cahn noted the passage contains an extra “if.”

Department Response: WDEQ/WQD revised the passage and removed the extra “if.”

12(g)

Lorie Cahn: Ms. Cahn recommended removing “the” from “the flow rates.”

Department Response: WDEQ/WQD revised the passage as requested.

12(i)(x)(B)

Lorie Cahn: Ms. Cahn recommended removing “of the.”

Department Response: WDEQ/WQD revised the passage as follows:

Proposed diatomaceous earth filtration shall be pressure or vacuum type units ~~shall be of the pressure or vacuum type.~~

12(j)(i)(D)

Lorie Cahn: Ms. Cahn noted that "with" should it be "when." "with" seems to tie to the reference to "chlorinator" and this is a timing issue.

Department Response: WDEQ/WQD revised the passage as follows:

Standby equipment of sufficient capacity shall be available to replace the largest chlorinator unit, ~~except for a well water systems~~ providing no treatment other than disinfection are exempt from the requirements of this paragraph (D) and are not required to provide standby chlorination equipment

12(k)(i)(A-H) and (k)(ii)(A-N)

Lorie Cahn: Ms. Cahn noted that several words are capitalized that should be lower case.

Department Response: WDEQ/WQD revised the passage by changing the incorrectly capitalized words to lower case.

12(k)(iii)(E)

Lorie Cahn: Ms. Cahn recommended revising "with" to "when" or "if."

Department Response: WDEQ/WQD revised the passage and the phrase has changed to "The validated dose that meets or exceeds the required dose shall be delivered under maximum flow and design (UVT) condition, ~~with~~ when the larger UV unit is out of service.

12(k)(iv)(G) and 12(k)(vi)(C)

Lorie Cahn: Ms. Cahn recommended revising "headloss" to "head loss."

Department Response: WDEQ/WQD revised the passages as requested.

12(l)(i)

Lorie Cahn: Ms. Cahn recommended adding "that" to "designs shall demonstrate."

Department Response: WDEQ/WQD revised the passage as requested.

12(l)(ii)(E), 16(l)(i)(B)(III), and 16, Table 4

Lorie Cahn: Ms. Cahn recommended revising "principle" to "principal"

Department Response: WDEQ/WQD revised the passages as requested.

12(l)(ii)(f)

Lorie Cahn: Ms. Cahn noted that “fluoride” is misspelled in the passage.

Department Response: WDEQ/WQD corrected the passage as requested.

12(l)(iv)

Lorie Cahn: Ms. Cahn noted that “loading” is misspelled in the passage.

Department Response: WDEQ/WQD corrected the passage as requested.

12(n)(iv)

Lorie Cahn: Ms. Cahn noted that the passage includes too many uses of “shall.”

Department Response: WDEQ/WQD corrected the passage as requested.

12(o)(iv)

Lorie Cahn: Ms. Cahn noted that “Log” should be lower case.

Department Response: WDEQ/WQD corrected the passage as requested.

12(r)(i)

Lorie Cahn: Ms. Cahn recommended adding “to” or “into” to “discharged directly a sanitary sewer...”

Department Response: WDEQ/WQD corrected the passage to “shall be discharged directly into a sanitary sewer...”

13(b)(ii)

Lorie Cahn: Ms. Cahn recommended revising the construction of the second sentence to match the construction of the first sentence.

Department Response: WDEQ/WQD corrected the passage to “Tanks shall maintain structural integrity while in use.”

14(g)(ii)

Lorie Cahn: Ms. Cahn recommended removing “(4)” from the passage.

Department Response: WDEQ/WQD corrected the passage as requested.

14(i)(ii)

Lorie Cahn: Ms. Cahn noted the use of “manifolded” is unusual in this context.

Department Response: WDEQ/WQD revised the passage to the following:

Each pump shall either have an individual suction line or shall have the multiple suction lines ~~shall be manifolded such that they will ensure~~ that demonstrate similar hydraulic and operating conditions.

15(c)(ii)

Lorie Cahn: Ms. Cahn noted the paragraph is incorrectly numbered.

Department Response: WDEQ/WQD corrected the passage as requested.

16(l)(i)(A)

Lorie Cahn: Ms. Cahn recommended that WDEQ/WQD review the passage and propose revisions for clarity.

Department Response: WDEQ/WQD revised the passage to the following:

(A) Applicability. ~~In order to~~ To protect all public water supplies from the possibility of the introduction of contamination due to cross connections, the water supplier shall: ~~require backflow prevention devices for each water service connection in accordance with Table 1 which appears at the end of this section, with the exception of (B)(I) residential water service connections and (B)(II) domestic non-residential water service connections. The water supplier shall take appropriate actions which may include immediate disconnection for any water user that fails to maintain a properly installed backflow prevention device or comply with other measures as identified in Section 14 (i) of these regulations.~~

(I) _____ ~~Require~~ Require backflow prevention devices for each water service connection in accordance with ~~Table 1 Table 4 which appears at the end~~ of this sSection, with the exception of (B)(I) residential water service connections and (B)(II) domestic non-residential water service connections.

(II) ~~The water supplier shall~~ Take appropriate actions that may include:

1. Immediate disconnection for any water user that fails to maintain a properly installed backflow prevention device; or

2. ~~comply~~ Compliance with other measures as identified in this Section.

16(I)(i)(B)(V)

Lorie Cahn: Ms. Cahn recommended revising “utilizing” to “using.”

Department Response: WDEQ/WQD corrected the passage as requested.

17(b)

Lorie Cahn: Ms. Cahn recommended revising “assure” to “ensure.”

Department Response: WDEQ/WQD corrected the passage as requested.

18(a)(ii)(B)

Lorie Cahn: Ms. Cahn recommended removing the extra uses of “the” from the passage.

Department Response: WDEQ/WQD corrected the passage as requested.

18(c)(ii)(A-K)

Lorie Cahn: Ms. Cahn recommended removing the extra uses of “a” from the passages.

Department Response: WDEQ/WQD corrected the passages as requested.