



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

CHAPTER 8 STAKEHOLDERS MEETING

Attendees:

Phil Walsack (MPUA), Mike Pessina, P.E. (Olsson Associates), Emily Lyon, Cynthia Smith, Cindy LePage, Mark Bockstruck, Dave Uhlig, Leland Neher, Keith Forck, Refaat Mefrakis, John Rustige, and Rob Morrison*

* DNR employees are denoted in blue.

Background:

- ❖ 110 through 130 have been presented. Comments are still welcome.
- ❖ We will discuss 140 through 170 today. Comments will be accepted anytime.
- ❖ We are taking the approach of putting out all the rules 110 through 220 and then going back to the revised versions. After comments are received on the revised versions, we will present the rules to the Commission.

10 CSR 20-8.140:

Pessina:

- ❖ **(5)(B)1.**: Can the three installations be any location nationwide or just in Missouri.
 - Nationwide
- ❖ Hypothetical situation: A technology in California is proven, but new to Missouri. How will we handle the review? Do you need data or will you accept CA's approval?
 - We need to review the data. Approval from other states must be similar to Missouri's rules and approval requirements.
- ❖ How will MDNR keep a record of approved technology? Currently there seems to be a disconnect between the Regions and Central Office. If approved in the CO, he doesn't want it re-reviewed in the RO.
 - All MDNR offices should accept an approved technology due to this rule (5)(B).
 - This is an administrative issue and guidance is needed.
- ❖ Will other consultants be privy to the performance data collected on a technology that was researched by me (Pessina)? And how will I (Pessina) know if a technology has been approved previous by MDNR?
 - The manufacturer will let you know if it has been approved previously.
 - Again, this is an administrative issue, which might need its own stakeholder group for input.
- ❖ Could the Cannibal Solids Process in MO, NE, and IL be considered proven?
 - Maybe, if we have enough data.

Mefrakis:

- ❖ How does the department determine performance? What statistics are used?
 - The new rule says that the treatment process must achieve limits 90% of the time. The statistics should be done by a professional and given to the department.



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Walsack:

- ❖ Asked how information about the meetings is getting out. Asked for copies of the previous and current drafts.
 - We will email you the drafts.
- ❖ What is the timeframe for the RIR and when do we estimate the rule making process to be finished. Remarkd on how evasive the department is on answering this question.
 - Not trying to be evasive, just unsure how we will package the rules several or one. Hard to predict how long the process will take. Anywhere from a year to five years.
- ❖ How do other states approve 10 State Standards?
 - Canada hired a contractor, which costs money. Other states have very active engineering councils which contribute a lot of time and thoughts. Our previous meetings have had more attendance.
- ❖ Has the department asked how other states deal with the cost issue of the RIR?
 - No we have not asked that yet.

Pessina:

- ❖ **(9)(A)**: Safety issues should not be part of the design. This could lead to a possible lawsuit
 - Will look at this.
- ❖ **(9)(A)13.**: "...in accordance with OSHA..." This is opening a can of worms. How can the department say it complies with OSHA and how can the consultant know either?
 - You have a point.
- ❖ **(8)(A)**: Idaho has a really good standard for emergency power.
 - Will look at this.
- ❖ **(5)(G)**: Does this rule mean all flows (including RAS and WAS) or just process flow?
 - Process flows only.
- ❖ **(6)(H)**: Believes the shalls in Landscaping should be changed back to shoulds.
 - Will change back to shoulds.
- ❖ **(8)(F)3.**: To what degree of accuracy must the measurements be taken? How must it be measured?
 - Mag meters could be used. Shouldn't this be in the design anyways?
- ❖ **(8)(F)2.**: Agrees with influent flow measurement on lagoons. Will this be used on inspections and force retro-upgrades?
 - No, it will be noted on the inspection report. However, there will not be any forced upgrades.



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10 CSR 20-8.150:

Pessina:

- ❖ **(3)(A)3.I.(II)**: What is acceptable? This rule seems very vague.
 - **Unsure, we will look at this.**
- ❖ **(3)(B)??**: It isn't stated clearly if a mechanical screen may have a manual screen as a backup.
 - **Manual is acceptable.**
- ❖ **(3)(A)3.A.**: There seems to be a disconnect between screen sizes.
 - **Will look at.**
- ❖ **(7)**: I&I is a looming issue and maybe this section should be beefed up.
 - **Flow equalization isn't designed for I&I and storm events. It is to be used for diurnal flows and such.**
- ❖ **(3)(A)4.**: Remarks on odor control in closed buildings.
 - **We agree that it does smell.**
- ❖ What event do you want to protect the plant from instead of a prescriptive equation for peak flow determinations?
 - **We cannot say bypassing is allowed. We cannot say which storm event to design for. Actual data is best to determine what the peak flows are.**
 - Brings up the point that flow measuring devices have a maximum flow they can measure.
 - Cannot measure the flows coming out of manholes, basement backups, and lift stations.
 - **All these things are true, but actual data is best.**

10 CSR 20-8.160:

Pessina:

- ❖ **(4)(D)3.**: Why are the weir loading rates different between 1 MGD plants and less than 1 MGD plants?
 - **10 States split them.**
- ❖ Why is the department not promoting redundancy of clarifiers?
 - **10 States doesn't promote redundancy of clarifiers.**
 - They become a maintenance issue when a clarifier cannot go out of service.
 - **The rule says they are to be designed to the peak hourly flow *not* the peak daily flow.**

10 CSR 20-8.170:

Not discussed. Send any comments into Dave or Leland.

Conclusion:

Send in any comments. We will email out the drafts of the next couple rules.