STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
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CERTIFIED MAIL: 7009 2250 0000 0886 5967
RETURN RECEIPT REQUESTED

May 12, 2015

Mr. Eric Seaman, P.E., Wastewater Division Director
City of Jefferson City
320 E. McCarty Street
Jefferson City, MO 65101

RE: City of Jefferson, MO – Standard Sanitary Sewer Specifications Revised 2015, Standard Sewer Specifications and Details Comments No. 2

Dear Mr. Seaman:

The Department of Natural Resources' Water Protection Program has finalized the review of the City of Jefferson Standard Sanitary Sewer Specifications Revised 2015 received on March 24, 2015 with the request for permit modifications (MO-0094846 and MO-0044300) to reinstate the approved sewer permit authority. We expect a response to the following requirements below within 30 days receipt of this letter:

DEVIATION REQUEST:

Requirement No. 10 of the original department comment letter dated February 24, 2015 requested revisions to Detail 50.02 to include concrete encasement of the drop connection. "Due to unequal earth pressures that would result from the backfilling operation in the vicinity of the manhole, the entire outside drop connection shall be encased in concrete", per 10 CSR 8.120(6)(B)4.

In order to obtain a permanent deviation for the City of Jefferson Standard Sanitary Sewer Specifications, the city must submit a separate written request. "Justification must substantially demonstrate in writing and through calculations that a variation(s) from the design rules will result in either at least equivalent or improved effectiveness", per 10 CSR 20-8.120(1)(A).

Provide the estimated number of manholes with outside drops shown in Detail 50.02 which have been installed since 2007. How many have had reported leaks or failures? Supply the documentation if available or a summary of the number of manholes with outside drop connections which failed due to the concrete encasement. Present the justification and equivalency of the city's method to prevent unequal earth pressures from damaging the manhole outside drop connection.

REQUIREMENTS:

The following items are required to be in compliance with 10 CSR 20-8. The City of Jefferson Standard Sanitary Sewer Specifications Revised 2015 must be updated to incorporate the following requirements.

1. Part SS 4.3.h of the revised specifications states, "[s]ewers built adjacent to or crossing streams shall be in accordance with 10CSR 20(8)." The citation should be altered to 10 CSR 20-8.120(8), which will fulfill requirements No. 13 and 14 of the original comment letter.
2. "Sewers crossing water mains shall be laid to provide a minimum vertical distance of eighteen inches (18") (46 cm) between the outside of the water main and the outside of the sewer", 10 CSR 8.120(10)(C)2.A. Part SS-2.5.b. of the specifications requires a vertical separation of force mains and water mains, but does not address gravity sewers. Add the vertical crossing requirement for gravity sewers.
3. Please provide two finalized copies of the City of Jefferson Standard Sanitary Sewer Specifications signed, sealed, and dated for department approval.
4. Please provide a copy of the passed and signed ordinance adopting the finalized City of Jefferson Standard Sanitary Sewer Specifications.

If you have any questions concerning the review of standard specifications and details, please contact Mrs. Emily Carpenter, Water Protection Program, (573) 751-6569, emily.carpenter@dnr.mo.gov, or Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176. For all other questions concerning the operating permit modification request, please contact Ms. Leasue Meyers, Water Protection Program, (573) 751-7906 or leasue.meyers@dnr.mo.gov. Thank you.

Sincerely,

WATER PROTECTION PROGRAM

Byron F. Shaw, Jr.

Byron F. Shaw, Jr., P.E., SRF Engineering Unit Chief
Financial Assistance Center

BFS:ecc

c: Northeast Regional Office
Mr. Refaat Mefrakis, P.E., Water Protection Program, Engineering Section
Ms. Leasue Meyers, Water Protection Program, Engineering Section
Ms. Joan Doerhoff, Water Protection Program, Compliance and Enforcement Section
Mrs. Emily Carpenter, Water Protection Program, Financial Assistance Center