



BOARD OF PUBLIC WORKS

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ELECTRIC, WATER AND SEWER DEPARTMENTS

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March 10, 2014

Emily T. Carpenter
Water Protection Program, Financial Assistance Center
Missouri Department of Natural Resources
1101 Riverside Drive, Jefferson City, MO 65101



Re: Comments to 10 CSR 20-8.190 Disinfection Guidelines

Dear Ms. Carpenter,

Thank you for the opportunity to comment on the 10 CSR 20-8.190 Disinfection Guidelines. Please see the Hannibal Board of Public Works (HBPW) comments in regards to PAA as a disinfectant below.

Comment #1:

(7) Peracetic Acid. (A) 1: The minimum PAA dose shall be one and a half parts per million (1.5 ppm).

HBPW believes this would be an unwise statement as written currently by MDNR to be added into Chapter 8 –Design Guides, to cause possible over dosing of PAA when it may not be necessary to provide adequate treatment as a disinfectant. What is the basis for requiring this minimum dosage, please clarify? With this minimum dosage requirement in this guideline, the HBPW recommends to MDNR to add wording to this regulations that would state;

"variances from stated minimum dosages and contact times will be considered by MDNR in cases where results from site specific bench and/or pilot testing demonstrate that permitted discharge limits can be achieved using PAA dosages and contact times that are less than the minimum dosages and contact times stated in the regulations, and that the minimum dosage and contact time stated in the regulations are intended for those facilities that choose not to conduct bench and/or pilot testing".

This allows individual WWTPs to determine what feed rate is necessary to meet regulatory guidelines.

Comment #2.

(7) Containers. (B) 1. Chemicals for use in PAA disinfection should be kept upright, in their original shipping containers with hazard labels intact.

HBPW believes this statement could preclude PAA from being delivered to a bulk storage tank onsite. Therefore, HBPW would like to see the (7) (B)1. modified to allow either original tote containers or on site bulk storage tank(s) to be utilized in the storage of PAA.

Comment #3.

(7) Contact Period and Tank (G) 1. A minimum contact period of ten (10) minutes at design peak hourly flow or maximum rate of pumpage shall be provided after thorough mixing.

HBPW believes this would be an unwise statement as written currently by MDNR to be added into Chapter 8 –Design Guides, to require more contact time than is necessary to provide sufficient treatment as a disinfectant. HBPW recommends to MDNR to add wording to this regulations that would state;

"variances from stated minimum dosages and contact times will be considered by MDNR in cases where results from site specific bench and/or pilot testing demonstrate that permitted discharge limits can be achieved using PAA dosages and contact times that are less than the minimum dosages and contact times stated in the regulations, and that the minimum dosage and contact time stated in the regulations are intended for those facilities that choose not to conduct bench and/or pilot testing".

HBPW believes this would let engineers and individual WWTPs to determine what contact time is necessary to meet regulatory guidelines and keep capital cost to a minimum. Thus allowing individual WWTPs to determine what contact time is necessary to meet regulatory guidelines.

Comment #4.

(7) Contact Period and Tank (G) 1. & 2.

HBPW would like to see that the outfall pipe from WWTPs be allowed as contact time in CT calculations into Chapter 8 –Design Guides.

If you have any questions regarding our recommendations, please let me know. HBPW is very interested in being kept informed since we are evaluating the use of PAA as our disinfectant. I appreciate the opportunity to participate in MDNR's review process of Design Guidelines 10 CSR 20-8.190 Disinfection.

Sincerely,

Mathew N. Munzlinger

Digitally signed by Mathew N. Munzlinger
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