



**Metropolitan St. Louis
Sewer District**

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May 20, 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 20-8.140 Wastewater Treatment Facilities

Greetings:

The Metropolitan St. Louis Sewer District (MSD) is suggesting the attached revision to Chemical Handling language in the second draft rule 10 CSR 20-8.140 Wastewater Treatment Facilities dated April 4, 2014 and currently posted on your website.

Sincerely,

Nora C. Estopare

Nora C. Estopare, P.E.
Principal Engineer
Metropolitan St. Louis Sewer District

Enclosure: Suggested Revision to Chemical Handling Language

(10) Chemical Handling, Housing, Safety and Identification. It is the wastewater treatment facility owner's responsibility to ensure that all local, state, federal and other applicable building and construction codes and requirements are met during construction and subsequent operation.

(A) *[Hazardous]* Chemical Handling.

1. ~~Containment materials~~Materials of Construction. The materials utilized for storage, piping, valves, pumping, metering, splash guards, etc., shall be specially selected considering the physical and chemical characteristics of each hazardous or corrosive chemical.

[2. Secondary containment. Chemical storage areas shall be enclosed in dikes or curbs which will contain the stored volume until it can be safely transferred to alternate storage or released to the wastewater at controlled rates which will not damage the facilities, inhibit the treatment processes, or contribute to stream pollution.]

2. **Secondary containment.** Each chemical shall be evaluated to determine if accidental release of the maximum storage volume can be discharged to the wastewater treatment facility at a controlled rate which will not damage the facility or inhibit the treatment process. The discharge outlet or gravity drain through the wall or floor of the secondary containment structure shall be designed accordingly. For each chemical that must be stored until an accidental release can be safely transferred, sSecondary containment shall be designed to contain any spilled product from the primary containers or rainfall from the operational containment area and secondary containment area for the amount of time required for proper cleanup and recovery.

(A) The volume of the secondary containment area when not protected from precipitation shall have a minimum volume of one hundred twenty-five percent (125%) of the volume of the largest storage container located within the containment area plus the space occupied by any other tanks located within the containment area.

(B) The volume of the secondary containment area when protected from precipitation shall have a minimum volume of one hundred ten percent (110%) of the volume of the largest storage container located within the containment area plus the space occupied by any other tanks located within the containment area.

(C) The secondary containment structure shall not have a discharge outlet or gravity drain through the wall or floor of the containment structure.

(D) The walls and floors of the secondary containment structure shall be constructed of suitable material that is compatible with the specifications of the product being stored.

(3) Liquid polymer should be similarly contained **as in paragraph (10)(A)2. of this rule** to reduce areas with slippery floors, especially to protect travelways. Non-slip floor surfaces are desirable in polymer-handling areas.