

Comments from the Chapter 8 Stakeholders Meeting 7/22/08

Attendance List: An attendance list for this meeting is unavailable.

10 CSR 20-8.110

(3)(B) – The first sentence gives a submittal period of 180 days for construction permits. It was recommended that this time frame be further defined to indicate work days or calendar days.

Action – The term “calendar days” was added to read 180 calendar days.

(4)(C)8.I. – It was recommended to change the title of this subparagraph from Sludge to Biosolids.

Action – This title was changed to Biosolids.

(5)(B)2.E. – It was recommended that cable be added to the list of utilities in this subparagraph.

Action – The term cable was added to this list.

(4)(C)5.A.(I) and (I)(a) – The question was raised concerning the specific reference to the 21<sup>st</sup> edition of the Standard Methods for the Examination of Water and Wastewater and whether or not the reference to the edition was needed.

Response – It was explained that we must provide a specific reference to the edition as part of the rule making process. The edition number was kept in the draft rule.

Action – None

(4)(C)5.C.(I) – This sentence has both english and metric units for two (2) design parameters. There was a question on the ratio of english vs. metric number used for these parameter numbers.

Action – This conversion was checked and the BOD<sub>5</sub> number changed from 0.1 to 0.09.

(4)(C)8.C.(VII) – It was suggested that a determination from DGLS regarding losing and gaining stream site conditions be added in this Part.

Action – This part of the rule is to address information needed from the Department’s Division of Geology and Land Survey (DGLS) when earthen basins are proposed as part of the project. The wording in this part was revised to include a stream determinations from DGLS for new wastewater treatment facilities.

(4)(C)8.C.(VIII) – There was a typo, the second sentence read as, “... water facility, a determined by the ...”

Action - This sentence was revised to read, “water facility, as determined by the...”.

(5)(A.)2.A. – There was a question if the test boring logs had to be on the plans or not.

Action – For verification, this subparagraph was revised to specify the test boring logs must be included on the plans or in the specification as an appendix.

(5)(A.)2.B. – This subparagraph states that blueprints shall not be submitted. It was suggested that this statement be removed from the rule. In the discussion it was determined that the number of plans submitted to the department as blueprints is very few. It was also discussed that

with today's technology, blueprints can easily be converted to acceptable documents. It was also noted that blueprints can not be scanned into electronic files which are increasingly being used for record keeping purposes.

Action – For record keeping purposes, this statement was kept in the proposed rules.

(5)(A.)2.B. – This subparagraph states that, in addition to submitting drawings, electronic versions of the plans can be submitted to assist in the review. The question was brought up concerning the term electronic versions and what versions, or what would be considered suitable for submittal. For example, would PDF files be acceptable.

Action – Since the use of the electronic version depends on the availability to both the consultant and the department review engineer and since the submittal of the electronic version is not being required by this rule, this subparagraph was not modified. The specific details on the electronic method used can be decided between the design engineer and the review engineer or the review office.

Note: (It was noticed in during the revision process that the nomenclature for this and the following subparagraph was incorrect. These subparagraph were revised to 5)(A.)2.A. and (5)(A.)2.B.)

(5)(A.)4. – The question was asked of what was needed as engineering criteria as required in this Paragraph. The intent of this paragraph was to include the technical design information and the pertinent operational assumptions used in the design of the system in the engineering report for departmental review purposes. When reviewing this issue, it was found that there was some overlapping of information in this Paragraph, Paragraph (4)(B)6., Subparagraph (4)(C)6.A. and Subsection (4)(D).

Action - The areas of the rule listed above have been revised to reflect and provide the design information needed with the respective documents.

Action – The words "... criteria shall be included with all plans and specifications..." were replaced with "... criteria shall accompany all plans and specifications ...".

Action – The sentence, "Unless required in 10 CSR 20-8.120 through 10 CSR 20-8.220, specific design calculations for the architectural, structural and mechanical components of a system do not have to included with the design criteria." was added to this sentence.

(5)(A.)4. – This subject was not discussed in the meeting. It was noticed during the revision period that some confusion may exist for the submittal of design criteria on design information for architectural, structural, mechanical, and electrical designs. Although this information needs to be included in the plans for construction purposes, unless required in 10 CSR 20-8.120 through 10 CSR 20-8.220, specific design calculations for these items do not have to included with the design criteria.

Action – A statement has been included in this Paragraph to clarify these requirements.

#### 10 CSR 20-8.120

(5)(A) – It was recommended that the minimum pipe sized allow for pipes smaller than eight inches (8") in diameter, especially for septic tank pumps systems discharging to gravity systems.

Action - This same subsection allows for smaller diameter pipe with justification and Subsection (1)(A) allow for deviations with justification. This Subsection was not changed.

(5)(D) – It was recommended that the minimum slopes outlined in this subsection be increased for velocities, when flowing full, of not less than three feet (3') per second. This was recommended due to the fact that contractors can have a hard time laying pipe at the lesser slopes provided in the rule. It was mentioned that there are situations where these lesser slopes are needed to due to topography. It was also mentioned that these rules set a minimum slope and, if a sewer district or operating authority, wants to set standards with steeper slopes, they can do so.

Action – This requirement was not changed.

(5)(H)5.C. – It was noted that there were no specifications regarding the number of flutes on mandrels uses for the deflection test. In this discussion it was pointed out that a mandrel needs to have an odd number of flutes for proper use. Nine flutes was the number provided and recommended for a minimum number.

Action – The requirement for a mandrel with an odd number of flutes and no less than nine flutes be used when a mandrel is used for deflection tests.

(5)(I)3.A. There was a question if manholes were included in the water test for gravity sewer lines. It was recommended that the words “any section between manholes” be included in this sentence.

Action - The subparagraph was revised to “... any section between manholes of the system.”

(6)(A) – It was noted that the word modem in the first sentence should be modern.

Action – Modem was replaced with modern.

(6)(B) – In draft copy, the words “when necessary” were taken out of the fourth sentence for inside drop connections. It was indicated by the committee that external drops are better than the internal for maintenance and that internal drops should be limited to larger diameter manholes.

Action – The phrase “(when necessary)” was replaced into the wording and the additional wording was added, “ can be used in manholes when the manhole diameter is sufficient to contain the drop pipe and allow adequate space for access into the manhole.” was added to this subsection.

(6)(B) – It was mentioned that contractors were installing drops that entered manholes on the joint between sections in pre-cast manholes and this was causing problems.

Action – A sentence stating “When using pre-cast manholes, drop connections must not enter the manhole at a joint.”

(6)(F)1. – It was noted that test time for the manhole exfiltration test varied between 15 minutes and 1 hour and recommended that one specific time be given.

Response – This time frame came from researching Iowa’s design rules.

Action – Due to lack of support in 10-States and the ASTM standards, this paragraph was removed.

Action – To prevent confusion, the word air in the title was changed to vacuum.

(10)(A)1. – It was stated that the distances given between sewer lines and manholes and water lines of ten feet were hard or impossible to meet when installing collection systems in cities or densely populated areas. It was recommended that an allowance for installing sewer lines and drinking water lines closer together be incorporated into this paragraph.

Response: This issue has come up before, but for a different reason. It was pointed out the these paragraph conflicts with the rules for gravity lines and force mains. The purpose of adding this distance in the rules was to provide some consistency with PDWB’s guidelines without having to reference another set of departmental set of requirement. To address your issue, we will have to deviate a little from this intent. We talked with PDWB and they stated that their concerns are over a potential for manholes to leak from joints where pipe enter the manholes, providing a potential contamination source to drinking water lines. With these concerns in mind, it was determined that there was two options to follow. These options were to either delete the 10 foot requirement from the draft rules or follow Ten States Drinking Water guidance and replace "shall" with "should".

Action – The was revised to " ... no sewer manhole should be located closer than ten feet...".

#### 10 CSR 20-8.130

(4)(G)4. – This paragraph requires that automatic heating and dehumidification equipment shall be provided in all dry wells. It was given that dehumidification is not needed in dry wells but it is needed in the electrical control panels if they are in the dry well.

Action – This paragraph was revised to require dehumidification for electrical motor controls located in dry wells.

(5) - The fourth sentence in Section (5) is repeated in Subsection (5)(C).

Action – The fourth sentence in Section (5) has been removed.

(9) – Their were some issues on the design flow that is needed to design the lift station for the 24 hour detention period.

Action – For clarification, the following sentence was added, “The retention time shall be based on the design peak hourly flow. Refer to Subparagraphs (4)(C)4.A., B. and C. of this rule.”

(10) – There was concern of the definition of excessive rock when defining when grinder pump systems can be used along with the justification for using grinder pumps systems over gravity sewer systems. This wording is basically arbitrary. It was recommended that a specific definition be provided are be this wording be removed.

Action – The wording for this portion of Section (10) was revised to, “... groundwater or other documented conditions make construction and maintenance of a conventional system not feasible or impractical.”

(10) – A discrepancy between the current rules and RoMS 249.1000 was pointed out and pertains to the operation and maintenance responsibilities between the operating authority and an

individual user for grinder pump and low pressure systems between the source and the connection point at the main collection system. The current rules sets the operation and maintenance responsibilities of grinder and low pressure system from source to the main collection system line on the operating authority. The statute allows the operating authority the option to either assume responsibility of this portion of the system or leave the user responsible for this portion of the system.

Action – To satisfy the statute, the wording of for this portion of this section was revised to, “The operating authority shall be responsible for the design and installation of the entire system which shall include the force mains, grinder pump units and appurtenances. The operating authority shall be responsible for the proper operation of the forcemain system, up to and excluding, the individual user’s pressure sewer systems.”

Action – Due to design and operational issues with this change, the additional wordings were added to (12)(K), “If the operating authority will not maintain control of the operation of an individual user’s pressure sewer systems in accordance with Section (10) of this rule, isolation valves must be placed at the point the operating authority’s responsibility ends and the individual user’s responsibility begins.”

(10)(E)1. – There was a typo in this paragraph. The word pumpage was spelled pump age.

Action – The words pump age were combined to pumpage.

(12)(C) – This subsection states that corrosion protection for the receiving manhole shall be provided in accordance with 10 CSR 20-8.120(6)G. It was noted that corrosion can occur in manholes near the forcemain termination manhole. It was mentioned that odors can be a problem at the termination manholes.

Action – This subsection was revised to “Corrosion protection and odor control for the receiving manhole, and or upstream manholes (if necessary), shall be provided in accordance with 10 CSR 20-8.120(6)G.”

(12)(H) – It was commented that a specific method for identification of the forcemain needs to be provided.

Action – The following sentence was added to this subsection, “This may be accomplished by the use of a metal tracer wire to determine the location of the pipe and/or brightly colored or different colored plastic coated metal strips or tracer tapes.”

(12)(I) – It was mentioned that some means, bedding, needs to be included for the protection the of forcemains from large and/or sharp rocks in backfill material. Technically, bedding is the portion of the backfill material used to support the pipe and provides little to no protection from backfill materials that could damage the pipe either during or after the backfilling process. It should be noted that the protection requested against rocks and other unsuitable materials was already included in the draft rule in Subsection (12)(I) Installation.

Action – Although protection of forcemains from rocks was already included in the rule, some wording was added for additional clarification.