

Water Committee Meeting

August 19, 2014

J.T. LANE: Welcome everybody. I think we'll get started with the roll call since we have to have enough to have a quorum.

SHEREE TAILLON: Dirk Barrios, Vern Breland, Ben Bridges (absent), Robert Brou, Jeffrey Duplantis (absent), Greg Gordon, Jimmy Guidry, Jimmy Hagan, Randy Hollis, Patrick Kerr, J.T. Lane, Rick Nowlin, Rusty Reeves (absent), Chris Richard, Keith Shackelford, Cheryl Slavant, David Constant, and Joseph Young (absent). We have 11 so we do have a quorum.

J.T. LANE: Thanks everybody. Good afternoon and welcome. Before we get going into our business, you have a sheet underneath your agenda which is a subcommittee status report, just where we are with each part as we go about discussing, and adopting new regulations for the state. That's just for your information. I didn't really want to discuss that report specifically unless y'all would like to, but I really wanted to give to you as an overview of where we are and really just kind of take a few moments to do a pulse check for everyone about our progress to date. I think we've made really good progress and really getting our work done in the best way possible. What we've seen we've needed roughly two meetings for each part to get it approved from both after the subcommittee work to get it discussed in full committee and then the next committee come back and discuss drafts and move for final approval and that's let us make some good progress on a few parts. What I would like to do we do have a number of parts left, just basically based on that, if we keep the momentum we have now it would take us a minimum of ten more months where we have a final set of rules. There's nothing bad about that timeframe, nothing that causes me any concern, but some of us may have a sense of urgency, but also want to do really meaningful and thoughtful work too so I don't want to rush it, but I also want to make sure everybody is comfortable with the time we are taking. I just thought we could use the first few minutes to discuss that. If in fact anyone is interested in

accelerating the timeline the first two things that jump out at me maybe extending the meeting times to allow for more work to happen for each meeting, or to maybe even have more meetings. That's just again, the timeframe I think it is definitely doable, but again let's take this moment just to see how everyone is feeling and if we want to discuss possibly adding anything else to our current meeting time or adding additional meetings. With that, Dr. Guidry do you want to add anything? I'll open it up to all of you if you have any comments, really just a quick discussion.

CHERYL SLAVANT: For us folks up in North Louisiana adding time as opposed to meetings would be great.

J.T. LANE: That would be the preferable option. Does everyone feel like we're making significant progress? Do we want to speed it up just a little bit as long as we're able to keep a robust discussion and have good quality work? Don't want to impede that. How does everyone else feel?

KEITH SHACKELFORD: Sounds good to me. I'm local, it's not a problem either way. Defer to the people that have to travel.

ROBERT BROU: Are we suggesting starting in the morning, break for lunch and continuing in the afternoon or...

J.T. LANE: Go back and look at the schedule for all the rooms and see what we can fit in. Either we do what we can, certainly I would prefer a standardized approach to it. Make sure y'all would be available on the days we already have set. One approach whether or not we try to add one additional hour for each meeting or two additional hours for each meeting. We can give y'all some options, something we can go back and look at. I wanted to make sure everyone was comfortable or had any objections. Re-poll to see if you would be available for extended meetings with our current set schedule.

ROBERT BROU: My only comment would be that I want to make sure if we have additional hours we actually have something meaningful we can talk about. So maybe tackle more than one section at a time, definitely speed up things. Don't want to meet and just spend more time on one subject.

J.T. LANE: I think you're right. We're going to have to monitor that. It's only going to work if we do more, I agree. Any other comments? All right, so what we'll do is go back and analyze the current schedule we have set and see what we can add to it and probably just poll the rest of you guys and see who can make it. I want to make sure we can maintain maximum attendance, obviously the quorum is the bottom line. We want to make sure we can maximize everyone's participation if we add more time to each meeting. With that, if there's no other questions or comments we'll go ahead and move to the next item which is approval of the minutes from last meeting which was sent to everyone via email. Were there any questions about any of the minutes? Do I have a motion? Jimmy. Thank you. Get a second? Randy. Any objections?

RANDY HOLLIS: I read them and I will promise to be here at every meeting from now on. Thank you Dirk. I do have some comments on that discussion specifically which we'll get to under old business.

DIRK BARRIOS: I take credit for a lot of stuff, I won't take credit for that.

J.T. LANE: With that move into our agenda item number 4, old business part 6 committee discussion and approval. Jake, this is the final approved text. This is what we did the side by side last time so do y'all want to review real quick anything else, any other modifications y'all might have made and then open it up for more discussion and Caryn make adjustments as we discuss. There are two versions, a clean version as it stands and one marked up with the changes we discussed in the last meeting.

JAKE CAUSEY: To the best of my knowledge only two things I recall that we said we were going to flesh out or revisit that was not finalized at the previous meeting. And one was definition for suction wells, said we would write one so that's in there in this version. Something that you all haven't seen yet. If there's a better way to flesh that out, certainly open to any suggestions there. Also, the only other thing the pumping station was the metering, individual pumps verses total station. I think the discussion was, and that's how we wrote it, was basically it's for the station as a whole, not necessarily the individual pumps. I think we wrote it in that fashion we had discussed. I think the language for everything else was we discussed at the meeting and should be exactly what you see

here. Those were the only two items. And then Chris provided the language on the motors shall be equipped with a nonreversible ratchet or other mechanical means language. So I think that's pretty much it. The only language that was not specifically hashed out at the previous meeting.

J.T. LANE: I think we sent all these out last week to everyone. I would guess at this point let's open it up. We did have a pretty good discussion on this last time. And I'll just open it up to the floor. Does anyone have any comments about the text, anything we maybe didn't capture quite the way we discussed in the committee?

DIRK BARRIOS: Hundred year flood elevation requirement, never agreed on anything for that. Reduce it from three to one which still is above the hundred year flood elevation. Again, we're talking about a hurricane or we're talking about a rain band?

JAKE CAUSEY: What we did put in here was the language that was recommended by the, I'll just say generally speaking, the full committee last meeting. That's what we put in here which did change it from three to one foot and then added language including the use of a levy system. That's my recollection. I think that's what was taken away from the committee. That's what you see there.

J.T. LANE: 6.1.1, right?

JAKE CAUSEY: 6.1.1 A.

J.T. LANE: Dirk, does that address your concerns on 6.1.1?

DIRK BARRIOS: If this would be strictly for new construction, then yeah.

JAKE CAUSEY: Yeah, I think that's precisely the premise for all the flood elevation requirements.

CHRIS RICHARD: Design is mentioned in 6.0, but does that mean everything that follows is for design because it doesn't really say like onsite protection. If not then we should have language saying in design or something like that.

JAKE CAUSEY: I certainly agree that that's the only thing flood elevation is used for and the specific regulatory language and how that's fleshed out. I'm not certain if for design that's there or just going to have to be addressed differently in the rule language, but I think certainly that's what would be

the case. May be there's still some question about how the grandfathering clause and other things might affect that. May just be part of that piece that addressed that rather than the language that you are referring to. I don't think we have that tweaked to know exactly how and where that would be specified, but that certainly would be the case.

J.T. LANE: So we have a running list, grandfather clause subcommittee, whoever is fortunate enough to chair that, I think this will be one of those.

CHRIS RICHARD: In the section I'm working on I tried to if it was specific for design actually prefaced by that so you don't have to worry about grandfathering. Make it clear here, don't have to revisit every section.

DIRK BARRIOS: Only other comment about elevation I would have would be if you're adding onto the existing facility and you have extended rule we're talking about maybe 5 foot higher. You would have some discretionary in there. In addition to the existing facility is what I'm talking about.

CHRIS RICHARD: That would be the grandfather we talked about before where you're retrofitting.

DIRK BARRIOS: For a brand new facility I can understand. We talked about this earlier, there's not many brand new facilities being built. A lot are additions to facilities in most cases, not saying there aren't any, in most cases upgrading existing facility because the population is increased and your plant is just not big enough, or facility is not big enough.

JAKE CAUSEY: I'll just say so on a statewide bases new facilities, there's lots of new facilities being constructed, brand new, full blown surface water treatment plants, certainly are perhaps in the minority of that, but generally speaking a lot of new facilities being constructed. Several new plants under construction or going online now. We even have existing plants that will build a new clarifier or they'll build a brand new bank of filters in a separate building, I guess for instance. I think if you're just replacing media and filters or changing control systems and those, changes pumps and all those basic things I think this would come up. If you pour concrete and building new structures then...

CHRIS RICHARD: That can be an issue. If you're adding onto an existing plant you want to keep

everything hydraulically flowing so if you're adding buildings to an existent plant and you want everything to be redundant you can't build it higher, have to build at same elevation.

JAKE CAUSEY: It does depend on design. So some facilities would build a separate plant adjacent to the existing plant and it's not relevant at all. If it's just a filter unit, yeah you're limited to existing infrastructure, you can't do anything differently. I think those cases are pretty straight forward.

CHRIS RICHARD: It's going to be like fire marshal, you're going to have to have certain levels when you're improving a facility how much whether it triggers having to bring everything up. Tearing out everything and starting over that's one thing, but if you're adding on a building like Dirk was saying.

RICK NOWLIN: Question Jake. I apologize for missing the last meeting and the discussion, but if you have a flood elevation established in South Louisiana and you have a storm event with a storm surge, may be 10 foot above that flood elevation . Does that reset the flood elevation, that storm surge, or not?

JAKE CAUSEY: I think that's probably why the other language was stricken in that section where 3 feet above the highest recorded flood elevation.

RICK NOWLIN: The answer is no?

JAKE CAUSEY: That's my understanding.

CHRIS RICHARD: If FEMA redoes it then.

RICK NOWLIN: Okay, thank you.

RANDY HOLLIS: Are we ready to move on to another part or stay at the hundred year flood elevation? I apologize for missing the last meeting also. Really good discussion last meeting, sorry I wasn't here. Under 6.2.1 suction well my question to Jake is and Caryn is if I design a floating intake structure that does not have segregated suction wells, floating intake structure, or if I put twin pumps into a ground storage tank, horizontal pumps, and use that will I be approved? Because this says suction wells must be water tight and also says must have separate pumping components to be taken out of service for inspection, maintenance, or repair. I can't do that with floating intake structure with

vertical turbine pumps, I don't have a suction well. So can we make suction wells optional depending upon the conceptual design? Otherwise you're going to kill me on an economical type of structure.

JAKE CAUSEY: Yeah, I certainly think so. When I was looking at this I guess to some extent I do believe we're looking at intake structures, but then I guess as we looked at this a little further it didn't really seem to encapsulate intake structures because it talks about floors sloped to permit. So we're looking at this thinking it's basically like a concrete box in the ground, vertical turbine pumps on top, something like that as a suction well. But intake structure, yeah if there's some language that you think will help draw that distinction even more so, yeah that's good.

RANDY HOLLIS: Because even not in raw water intakes, but for distribution systems where the pumps go into the ground storage tank and you have multiple pumps going in on the side of it it's not segregated. We use those all the time. Even the suction of the pump goes in the side of the ground storage tanks. One place I got four pumps going into the side of a ground storage tank. That is my suction well, but it's not segregated. I just wanted to make sure like a crom tank those will be approved.

CHRIS RICHARD: That's what prompted this whole conversation was the fact that you have ground storage tanks working that way and steel tanks you can't have a sloped floor, typically they're not, just a membrane type of floor. That's kind of what prompted the definition. May be we just need to add some more.

JAKE CAUSEY: That's exactly what we're trying to address as Chris said, certainly in agreement with that. That section would not be applicable in those scenarios and I guess we use the term just like compartments. I guess thinking segregated compartment, not the storage tank itself as a suction well. May be you could put some specific exclusions or something from that.

PATRICK KERR: As it's defined I think you're fine. If I were to read this my way it would say if you have a suction well it has to have these characteristics. And the definition they are using is a compartment. If there's not a compartment these characteristics are not necessary.

RANDY HOLLIS: Is a crom tank considered a suction well because that's where you're pulling suction?

PATRICK KERR: This definition for this code says it's a compartment designed to facilitate suction of water by a pump. So it would have to be a compartment in the tank, I would think. And I think the record will show that too.

RANDY HOLLIS: As long as we don't have to put in multiple tanks for multiple compartments. Do we want to cover that right now, or leave it like it is, or do we need a clarification?

PATRICK KERR: Other than from a storage tank.

RANDY HOLLIS: That's fine.

CHRIS RICHARD: Even a clear well you might have ten turbine pumps you don't have a compartment for each one of them. It's not just a ground storage tank. It's more like you have just suction wells. There's many other ways of doing it not that way.

JAKE CAUSEY: We wrote the definition with the intent that as Pat interpreted, but that's why it says compartment, not necessarily storage facility. That compartment is designed...

CHRIS RICHARD: Maybe say excluding storage tanks and clear wells.

JAKE CAUSEY: Might be easier to do it that way.

RANDY HOLLIS: Excluding raw water pumping and ground storage tanks, intake structures. Excluding intake structures, ground storage tanks, clear wells.

SPEAKER: (inaudible)

RANDY HOLLIS: That would be either intake or clear wells.

PATRICK KERR: Riverbank filtration and (inaudible).

RANDY HOLLIS: That would be an intake. Okay, the next comment that was raised was on 6.3 on pumps, at least two pumping units shall be provided. I am a very strong proponent of that. I think you need to have two pumps, I do. If you're relying on one pump to meet the system demands and you can't meet 20 PSI with one pump you have to have a second one. If you lose the first one you're dead in the water. But, what if that booster station is only for a betterment. Let's say that we can meet 20

PSI without pumps, but to serve that part of the system you want to get 65 because customers like 65 a lot better than 25 and they use more water so we like to sell more water. I think as far as a betterment if you can prove hydraulically that you can meet conditions at 20 PSI without any pumps then I don't think you have to absolutely have two pumps in that condition. What about backwash? You have many plants that have single backwash pump. The backwash is a distribution or an elevated tank. I don't think we have to have two pumps for backwash. And then the third example I have, what about tank turnover. Looking at water quality these days we need to turn tanks over. Many pumps that have a single pump on them. If we lose that pump what do we do, we operate the system, we drop the system pressure down so we can turn the tanks over. There is a good option to that without having to provide a duplicate pump. I think to make a blanket statement that at least two pumping units shall be provided in all conditions is not necessary because I think there are some good exceptions out there where we don't absolutely have to have duplicate pumps. I'll reiterate; I do like metering stations. I like gauges on every single pump. I think if pumps are critical to meet 20 PSI you absolutely have to have two pumps.

JAKE CAUSEY: I think the best way to address that would be to write the specific scenarios. You named three which are probably the totality of those that would perhaps arguably make some sense. The issue we have with the original language, and it was just contradictory the way it was written within the paragraph itself. If you want to write when pumps are used to circulate water to storage tanks you don't have to have two. I think a couple of exceptions probably resolve.

PATRICK KERR: If you can just change that first phrase or sentence to say something like any pump which is required to meet water quality standard demands will be provided with full redundancy. If I have three to serve for two that's full redundancy. If I need two we can say if one goes out we have full redundancy for that. It seems it would cover everything Randy is talking about. So only pumps are required to meet state water quality or pressure requirements, but if I go out and put in a booster station, as Randy said, cause it helps me meet customer demands, higher pressures, then the

state shouldn't have an interest in making sure I maintain that as a water system provider.

JAKE CAUSEY: Perhaps. I think one issue is going to be that those demands do change over time. So you put a booster system in today because they don't like 30 they want 50 and then 5 years down the road they got another 200 customers down there your dynamic has changed. And so I think that's probably why on the front end is when we have booster stations for that because those conditions change in the system over time. Year to year most likely for some systems. For others it may not change for a long time. Backwash pumps I would say are needed for water quality. I don't know if that would fit the criteria.

CHRIS RICHARD: I think that would be in treatment. Probably filtration and treatment. The other thing instead of having the pumps capable of meeting maximum demand of the system is that what you want is redundancy so you want one pump out of service to meet the design capacity of that station. If it's a booster station you don't need to meet the system. Using the system to decide what flow you need this station to provide. Once you do that you don't look back at the system, you say now this pump station needs to deliver so many GPM. If one pump's out I need to still be able to deliver so many GPM without any kind of maximum (inaudible). So I would change that language to say the capacity of the pump station with one pump out of service not, what does it say, the maximum pumping demand of the system.

JAKE CAUSEY: The system is much larger than the area served by that individual station. Talking about this section where it says the demand of the system just means the maximum demand.

CHRIS RICHARD: Design capacity of the station.

RANDY HOLLIS: I go back to reiterate I think we can make it really simple like Pat suggested at the very beginning just say two pumping units shall be provided when the station is required to satisfy 20 PSI or something to that affect rather than listing exceptions.

JAKE CAUSEY: My concern is that's a moving target.

RANDY HOLLIS: Every pump station is a moving target. Ascension Parish went from 500 customers to

25,000 customers. What we put in for 500 customers.

JAKE CAUSEY: That's the change that Chris just made.

RANDY HOLLIS: We had to come back and redesign every pumping system. You can't put something in today that you know is going to satisfy 20 years' worth of service. You have to look at it periodically.

JAKE CAUSEY: You should. So there are those that don't.

RANDY HOLLIS: If I put something in that I project 10 percent growth per year it's going to be so overkill today that (inaudible).

CHRIS RICHARD: Randy, you have an issue with putting two pumps?

RANDY HOLLIS: No.

CHRIS RICHARD: If you're going to put two pumps if you design your pump station and you agree two pumps should be there then it just says with one pump out of service you meet the design of the station. If you designed your station to provide 20 PSI with one pump over whatever then that's what it's going to do, you designed it. If you agree with the two pumps all its saying is it should be able to meet the capacity of that station with the pump out of service.

RANDY HOLLIS: I agree with two pumps when that station is necessary to meet 20 PSI, but if that pump station is only for a betterment, let's say that I can do distribution for tanks or whatever, treatment plant I can get 25 PSI to the end of the system, but I want to get 65 out there at all times put pump station (inaudible) and keep them on a constant 65 then I don't necessarily have to put in two pumps because one is going to do the trick. When it goes down they live with 25 until I repair the system. Backwash pumps the same thing. I don't necessarily have to have two pumps in every application. That's my point. Don't force me to put in two pumps when it's not necessary. If the two pumps are necessary to provide 20 PSI, absolutely.

ROBERT BROU: That was the exact conversation we had. The attempted language, I think it was Jeff tried to put in there, I was part of that subcommittee, that was the discussion we had, exactly what you just said Randy. When you're only looking for to improve a situation, but not necessary to meet

all the water quality standards. That was the attempt of what we tried.

RANDY HOLLIS: If I'm using pumps to turnover a tank why do we need two when one works and I've got an alternative method of turning over the tanks.

ROBERT BROU: We didn't discuss tanks.

JAKE CAUSEY: I don't know that a tank is a booster station. It's a circulation pump.

PATRICK KERR: We have quite a number of ground storage tanks that we use as booster stations. We bypass them, we pull water out of the tanks and introduce it. It's a booster station with a reservoir.

JAKE CAUSEY: I understand that there are pumps on tanks that are used as booster stations. My understanding, what Randy was referring to, is a pump on a tank just to recirculate the tank.

RANDY HOLLIS: Water down pumping into the system to pull the tank down so we use that to pull the tank down to turn over the tank and we refill it later. It's not recirculating the tank.

JAKE CAUSEY: So it is acting as a booster station.

RANDY HOLLIS: But if we lose that pump all we do is turn off wells, lower the system pressure, and get water out the tanks. We just don't normally operate that way because people like better pressure. And the hydraulic (inaudible) exceeds some of our tanks, but we can pull the pressure down and turn over a tank if we have to.

JAKE CAUSEY: But so you're saying you only need one pump?

RANDY HOLLIS: That's right. We only need one pump because we have an alternative way of meeting the criteria you set to turn the tank over.

PATRICK KERR: Just like for backwash, elevate the tank in lieu of a pump.

JAKE CAUSEY: Yeah, I don't disagree with that. I guess what I'm saying is that so we've had booster stations where today if that pump goes out they can be 20 PSI. A year from now they're still using the station to meet the criteria and they've got an extra 100 customers down there that pump station goes out, probably not going to meet the 20 PSI because their conditions have changed. That's the moving target that I'm saying. As long as the pump is working the system is fine.

DAVID CONSTANT: Instead of having two pumps shall, talking about having shall have redundancy in the system might be hydraulic head, might be another pump, it might be with the booster pump or without, but you're talking about having redundancy.

JAKE CAUSEY: How are we defining redundancy? Frankly, we'll have a slew of many different arguments about how these different things can happen and if those aren't spelled out what meets the criteria for redundancy I don't think we've solved anything. I guess that's what I was talking about just naming those exceptions as far as--

PATRICK KERR: Just something you just said Jake that concerns me, the booster pump isn't a function, its capacity is not only a function of the pump, the station is not a function of the pump capacity putting a second pump on a booster station that's limited to moving through a 1,000 gallons a minute at 65 PSI. Doesn't mean next year I can put through 1500 because I turned the second pump on. If you're saying we need to overbuild the facilities for growth, I know that's not what you're trying to say, but it's basically what you're saying. If we don't do this what happens five years from now when they need additional capacity downstream? Well, I still have a 16 inch line feeding that low pressure cutoff is going to shut me down at a 1,000 gallons. Doesn't matter how many pumps I have. I think you're trying to fix a problem that--

JAKE CAUSEY: Well, that's not what I was getting at. So realistically systems invest as much as they're able to or may be what the demand or need is, but certainly A they can save money and get a line out somewhere that they couldn't otherwise by putting a second pump. That's going to happen. And then B they are not going to upgrade the station until they are having low pressure issues. I mean that's what I'm saying. The deal is upfront they're going to say hey we don't need the second pump, we don't have to spend the money, we can meet 20 PSI. But they are going to continue to expand the system until they have low pressure issues and that will be if they have two pumps it will be with both pumps running at the same time or if they only had one pump it will be with the one pump. They will expand the system until it basically is overloaded in a sense.

PATRICK KERR: If you design it to require two pumps then we have to have a third one. We have to have redundancy.

RANDY HOLLIS: If you have a pump station, a booster pump, with typically flat curves, not your vertical curves (inaudible), more flat curves. If you have a station designed for 100 gallons a minute the second pump you might get 125 because you don't know the capacity or the nature of turbine hydraulics. You can't say let's kick in a second pump and we're going to double the capacity. Once you design that pump in there it's there. The proper thing to do is to design it properly upfront. If they need 500 you have (inaudible) standby. I am all for two pumps if that station is necessary for 20 PSI, I am for that. There are many applications where we don't need that redundancy.

CHRIS RICHARD: If I understand what Jake is saying, just to try to clarify in my mind, it's when you have one pump and to meet 20 PSI like you said and that's all it's for and if it goes out you still have 20 PSI you're okay. If it grows enough then it goes out then you don't meet 20 PSI if you had one subdivision. What if you put the language in there that instead of having two pumps or the provisions to add a second pump because if you build a small area that you can't have a second pump you have the ability to add it in the future should it be needed. Would that satisfy both of your concerns? In other words, you don't put it in you just have the ability to add it.

RANDY HOLLIS: When we design, you design them, we design them you look at not just existing customers, you look at future customers. So any type of an RDA loan you look at future customers. I don't dare design it on existing customers today because next year it's going to be out of date. So every pump station we design should be based on hydraulic analysis, future customers for the life of that station or the life of a loan. I don't think there's a real good application out there where I put a pump station and next week it's going to be overloaded or next year. I go back to say if we can provide 20 PSI without the station, why put in the station? I mean how many systems do we have that we met 20 at the end of the system and we have no stations sitting there? That's approved, that's designed, that's allowed. We're not putting in bigger pipes because we designed those pipes

to meet 20 with future customers in mind. All I'm saying is if you have a pump those customers like 65 as opposed to 20 and you can still meet 20 why require the redundancy? That's all I'm saying. But if it's needed to meet 20 PSI, absolutely put in two pumps.

PATRICK KERR: Can you just call it critical installations will include redundancy? Critical installations required to meet pressure requirements.

RANDY HOLLIS: In lieu of saying critical I'd just simply say at least two pumping units shall be provided if the station is required to meet 20 PSI.

KEITH SHACKELFORD: Start the sentence with where necessary to meet minimal system requirements.

RANDY HOLLIS: At least two pumping units shall be provided. That's fine.

PATRICK KERR: Then you're going to ask about 6.3 B, right? Is that next on your list?

RANDY HOLLIS: No. Yeah, okay. I missed that one. I like what Keith suggested if we can put that in.

KEITH SHACKELFORD: You start the intro part of 6.3 with where necessary to meet minimum system requirements then at least two pumping units shall be provided.

J.T. LANE: Jake, any other comments you have on that?

CARYN BENJAMIN: Say it again.

J.T. LANE: Beginning 6.3 pumps, beginning at the first sentence where necessary to meet minimum system requirements, at least two pumping units shall be provided. We can kind of maybe combine what Pat said earlier in this new clause where necessary to meet minimum system requirements such as pressure or and water quality, at least two pumping units shall be provided.

KEITH SHACKELFORD: Just further explaining what the minimum requirements are.

JIMMY GUIDRY: I'm listening and this doesn't totally make sense to me and I'm not the expert so bear with me. What we want is that the pressure never drops to put people's health at risk. We want to keep it from getting contaminated. So we want a redundant pump where if a pump drops out the other pump is there so that you never drop that pressure. So it's really about having redundancy where it's critical to have the redundancy. You don't have to have redundancy throughout the entire

system, you have to have it where the pump goes out and the pressure goes down below the protected pressure. That's really what we're trying to do.

KEITH SHACKELFORD: The case you're describing you're depending on that station to maintain that pressure so you have to have two, but if you can maintain the pressure just through straight flow through the pipes hydraulically, as Randy called it, you're increasing the pressure, you're bettering the system operation above the minimum requirements with the booster pump then it's still not necessary to have the redundant pump.

ROBERT BROU: There's still redundancy in the pumps. They may be back at your plant, upstream, or downstream.

JIMMY GUIDRY: The way you're suggesting the wording right now is saying if we need two pumps to keep that pressure up, but that's not what it is. If we need another pump to backup if that pump goes out. It's not just having two pumps because you needed two pumps to increase the pressure. It's having that second pump if that pump goes out and drops the pressure to maintain the pressure.

PATRICK KERR: Dr. Guidry this is just pumping facilities we're talking about, so individual facilities as opposed to system capacity. This is just the pumping facility so if the facility is backed up by something else, is required to be backed up by something else, that something else has to be there too.

JIMMY GUIDRY: All right.

RANDY HOLLIS: I am not about to suggest we compromise on 20 PSI, not at all. If we need it we need two pumps. The concern I have with operators is when that first pump goes out now you're down to only one pump. So many of them let that first pump sit there for months and don't fix it. That's where y'all can get so much help because when that first pump goes out fix it because now you're down to a situation you're describing if you lose that backup now you're in trouble.

PATRICK KERR: I would like to know what subparagraph B means.

CHRIS RICHARD: The motor. The motor you don't want it (inaudible) you get a line break and the

motor's going to draw more and burn up your motor. It's good practice to provide horsepower to make sure your pump is not capable of drawing more horsepower than the motor can provide.

RANDY HOLLIS: I agree with Chris. It doesn't say the maximum horsepower that you could put on the pump. What it says is the maximum horsepower condition of the pump.

PATRICK KERR: So if you run it out to the end of the curb.

RANDY HOLLIS: So if that particular (inaudible) requires 50 horsepower even though you put a 100 on the pump. The wording is okay.

J.T. LANE: Good on B. Next comments.

RANDY HOLLIS: Just for grammatical on 6.1.1 A where we said the station elevation to a minimum of 1 feet, make that 1 foot.

J.T. LANE: I guess so.

PATRICK KERR: 6.4.1 the same. I think we should just strike it.

RANDY HOLLIS: Or after duplicate pumps when required to meet, the same language.

J.T. LANE: 6.4.1 duplicate pumps, just strike that part?

PATRICK KERR: And 6.4 A I think is covered in C. Says you can't go lower than zero and you can't go lower than twenty and twenty's the real limit.

CHRIS RICHARD: If you suck it off a tank.

PATRICK KERR: You're sucking air then it's below the bottom of the tank.

CHRIS RICHARD: But you don't have to have 20 PSI (inaudible).

PATRICK KERR: Okay.

ROBERT BROU: B says the pumps installed in the distribution system shall maintain inlet pressure required in section 8.2.1. I don't have that with me, but I think 20 PSI.

CHRIS RICHARD: I'm talking about the suction of a pump which is connected to a tank does not have to have 20 PSI. A covers the fact that it can't be below 20, can't be negative.

PATRICK KERR: But B covers it too. The last sentence covers exactly that.

ROBERT BROU: Between B and C it covers it.

PATRICK KERR: A and B conflict each other there. Cause we allow suction and other parts, don't we? I just want to make sure we don't need to keep 50 feet of pressure on top of a pump. We do need to fix this though. There's a conflict in here, I just can't find it. Because we say you have to maintain 20 and then it says pump taking suction from the ground shall be equip with automatic shutoffs, it doesn't say they're exempt from the 20. Keep 20 pounds on a tank I need to keep the (inaudible) 50 feet tall, right?

CHRIS RICHARD: It's inline booster pumps you have to maintain 20. It talks about inline below, but it doesn't refer to (inaudible) 20 it's for inline boosters and suction pumps would be (inaudible).

PATRICK KERR: So should we call this inline booster pumps?

CHRIS RICHARD: I think that's what they're referring to.

KEITH SHACKELFORD: Rename 6.4 inline booster pumps.

CHRIS RICHARD: B would be coming off of a ground storage tank, C would be inline pump.

RANDY HOLLIS: We've got apples and oranges in this one section.

CHRIS RICHARD: 6.4.3 is inline booster pumps if you want to move B under that?

RANDY HOLLIS: The first sentence of B, not the second sentence.

J.T. LANE: So for 6.4 move B, the first sentence of B, to underneath 6.4.3. That would solve the issue?

PATRICK KERR: No. We have, Randy, booster pumps that do both. I'm sure lots of systems do, where if you need more capacity you take it out of clear well, if not bypass the clear well to add water to a high service pump, for example. Is that inline booster pump or is that distribution booster station? We might need to fix this.

RANDY HOLLIS: I think any pump that pulls from a pipeline connected to the distribution system would have an inline booster and it cannot drop below 20 PSI, but we have other pumps that pull from the storage tank and they're obviously well below 20 PSI because of the level of the tank. But I don't know of any booster tank, any booster pump we have inline drops below 20. I think if we pull the

first sentence B and put it under booster pumps and the first sentence of C and put it under booster pumps under inline. That will resolve two of the issues.

CHRIS RICHARD: Booster pumps is the header of the whole thing and then you have a subsection that says inline booster pump. So maybe you want to have some header that's for pulling off a tank and then have it underneath it and then have inline booster pump and what covers inline booster pumps beneath that. It's still kind of confusing if you don't have a heading for defining the first section. Cause right now it just says booster pumps.

PATRICK KERR: I think part of the problem is suction line. We need to maintain 20 PSI in the distribution system upstream of the pump. Not anything to do with the suction line.

ROBERT BROU: We don't have one anymore, but in the past St. Charles had a line feeding a booster pump that they had to have that low cutoff switch because it was, the concern was dropping the suction line below 20 PSI which is also a distribution line leading up to that station.

PATRICK KERR: If we just said automatic shutoff for low pressure shall maintain at least 20 PSI in the distribution system upstream of the pump.

RANDY HOLLIS: That's the same thing. Suction line is the distribution line upstream.

PATRICK KERR: If it's not a distribution line (inaudible) it's not.

CHRIS RICHARD: If it's under inline boosters and inline booster pump by definition in my mind is on a distribution system.

RANDY HOLLIS: I believe the first sentence under inline booster pumps will resolve it.

PATRICK KERR: But we have pumps either on the tank or the distribution line. Sometimes we bypass tanks and we fill them while we're pumping to increase pressure downstream cause we have excess capacity upstream. Is that an inline?

CHRIS RICHARD: It's operating as one under that function.

PATRICK KERR: Exactly.

CHRIS RICHARD: When you do that your suction line (inaudible) under that operation.

RANDY HOLLIS: I think for this instance if we take B and C the first sentence and put it under inline booster pumps that leaves the basics for the booster pumps of the negative pressure, the suction lines, and the storage tanks where it should be and put those two specific sentences where it should be under inline boosters.

CHRIS RICHARD: And if it operates both ways both apply depending on the operation of the pump station at that time.

KEITH SHACKELFORD: Now say all that again.

PATRICK KERR: So the first sentence of B and C goes into 6.4.3. And B and C will remain, just be the second sentence.

CHRIS RICHARD: Can you also copy E to under 6.4.3 so the inline booster pump has a bypass also.

J.T. LANE: 6.5. Looks good. 6.6.

PATRICK KERR: We have to use electricity when we use hydraulics in 6.5?

J.T. LANE: The last sentence in 6.5.

PATRICK KERR: We use hydraulics for some of our, for example, closed by-passes, booster stations, we don't need electricity.

RANDY HOLLIS: Under 6.5 Pat?

PATRICK KERR: Hydraulically operated valves.

RANDY HOLLIS: Spring-loaded hydraulically operated that close automatically without electricity. The biggest concern I had when I read through the minutes was the fact that it says that every single station shall report when the station is out of service which means, I think the discussion was last time not a red light blinking, but you actually have to have telemetry to send it to somebody at the station it no longer works. That's what I gathered out of the minutes of the last meeting. And this is for all new design, every new station. It's not a bad idea, but it will add cost to it for telemetry.

PATRICK KERR: Locally controlled station, not remote controlled. If I put a PLC in the field it's not remotely controlled?

J.T. LANE: 6.6. So everyone's good with 6.6 which is the last section? Any other comments on the draft?

RANDY HOLLIS: Sorry to regress. Under 6.2 pumping stations the very beginning of this where we have both raw and finished water pumping stations shall A be of durable construction, fire and weather resistant. No problem with that. Have underground structure waterproofed. Every pump station shall have an underground structure waterproofed. I'm reading it literally. So if you turn in a design and you don't have an underground structure, that's literal. If I've got ground storage tanks above ground I've got to put something underground so I can waterproof it?

J.T. LANE: Just add have any underground structure waterproofed. Just add the word any, just have any. Any other comments? All right, so these are the changes I have we're going to make and work through. First one would be to add 6.2 B add the word any after have. So have any underground structure approved. 6.2.1 we're going to the definition add suction well to the end of the definition excluding groundwater tanks, intake structures, and clear wells. Is that correct? And then on 6.3 at the beginning of the first sentence where necessary to meet minimum system requirements such as pressure and water quality at least two pumping units shall be provided.

JAKE CAUSEY: And then there was a change on the second sentence. Second sentence says with any pump out of service remaining pump or pumps shall be capable of providing the maximum, instead of the maximum pumping demand of the system, we are going to say maximum design capacity of that station.

RANDY HOLLIS: At the beginning when you read that very first sentence two pumping units shall be provided, like to take out water quality because turning over tanks is water quality and that was one of the examples I gave. (inaudible) I don't mind for pressure, I don't want to put water quality (inaudible) duplicate pumps for integrating tanks.

PATRICK KERR: It's not required to meet water quality if you can do it another way. In systems that produce pressure it's not going to allow me to have sufficient flow in the system. If you're running

the periphery at exactly .5 milligrams per liter and I reduce the pressure of the system I guarantee you you're going to drop below. A lot of demand is timed demand. People turn on the shower. It takes as long as it takes. If I know it's periphery I maintain exactly .5 and I reduce the pressure it's going to drop. That's the only thing I was thinking about water quality.

RANDY HOLLIS: Your chlorine residual is going to drop the pressure?

PATRICK KERR: No, if I drop the pressure there won't be as much movement of water in the system and so the less water will get used and that last customer's going to end up with older water. I'm probably taking it to the extreme. If you just want to take it to 20 PSI that's fine.

RANDY HOLLIS: On the hydraulic analysis it shows that we don't (inaudible), but water quality is going to get a whole bag of worms. It's easier to do a hydraulic analysis to show I can meet 20 without the station at all. I think that's just going to complicate the issues we're trying to resolve. Minimum system requirements.

J.T. LANE: We got the other change in the second sentence where we will take out at the end maximum pumping demand, system meet maximum design of that station. The next set of changes was 6.4 booster pumps. Take the first sentences of B and C and move and copy E and move that under 6.4.3 inline booster pumps and leave the second sentences of B and C. Under 6.4 we're going to strike 6.4.1 entirely. And I think that was it. Did I miss anything? So what we'll do is go back, change, tweak this language. I don't know if Caryn is going to be able to edit fast enough to take a vote in this meeting. We'll add it to do a final vote next time.

ROBERT BROU: On 6.6.6 standby power was to maintain minimum 20 PSI, but the discussion we had during the subcommittee really revolved around the same redundancy issue that if a station was critical to man that 20 PSI that should have to have backup power, but in some circumstances not having that during a power outage is not critical to your system and that way it would allow systems that have multiple pumping stations to go to their critical facilities that have backup power to those, but not necessarily at every single station and that's really not captured the way we have it worded

currently.

PATRICK KERR: Why? Just says you have to have enough to maintain 20 PSI throughout the system.

ROBERT BROU: It still says to ensure continuous service a power supply shall be provided, standby auxiliary power. If it said in order to maintain or if necessary to maintain.

KEITH SHACKELFORD: Same language where necessary to maintain minimum system requirements.

ROBERT BROU: I don't think it captures it. Something as simple as where necessary to maintain the system pressure.

J.T. LANE: Add where necessary. We'll do that on 6.6.6.

PATRICK KERR: Say a power supply shall be provided where necessary?

J.T. LANE: Power supply shall be provided from a standby or auxiliary source where necessary to maintain. All right, so Caryn is going to work on that for us. We'll do public comment after we do part 1. With that Keith is going to give us his subcommittee report on part 1. Y'all have a copy of that marked up in your packets. With that I'll hand it over to Keith.

KEITH SHACKELFORD: Thank you. It's been quite some time since we originally visited this section and I don't know if we're at the point where we need the side by side comparison or comments from DHH and yourselves. There were frankly very few changes in general to the entire section. But the very first part 1.0 general beginning of that sentence for all new facility construction was a big topic of conversation. A lot of the other changes are replacing reviewing authority with state health officer. Then as far as submission of plans for maintenance and replacement of existing facilities shall not be required. That goes to operations and maintenance more than it does new design and construction. And again we, a lot of discussion and debate, the consensus was in the discussion that we would change the last sentence of 1.0 general to read document submitted for formal approval should include but not be limited to and then moving on down. And we don't get to any other substantial change until we get to part 1.2.1 L where we deleted the phrase noted on one sheet with respect to location and nature of existing waterworks structures and appurtenances affecting the

improvements. The magnitude of the set of plans can be such that you just can't get all of that on one sheet. Continuing on detailed plans 1.2.2 A we added the exception, I'll read the whole thing, stream crossings, providing profiles with elevations of the stream bed and the normal and extreme high and low water levels except where submarine stream crossings are to be installed by means of directional drilling then the extreme high water level may be omitted. Continuing on down sub paragraph F in that same section the discussion was that often we don't know the exact stratification and geological layers and materials. Before the well is drilled we know generally what they are from other wells in the vicinity, so rather than put a definitive document together listing that information we changed it to read that upon completion that we submit record drawings reflecting the actual geologic formations and water levels. Moving on, section 1.3 specifications. We added the phrase to the very first part for those applicable sanitary components in the completed details technical specifications. Laboratory facilities and equipment for all new plants. Going down the design criteria, 1.4 and the introductory sentence once again added for those applicable sanitary conditions. 1.4 L add the term chemical to the feeder capacities and ranges. And the last two changes in part 1 again were changing the title of reviewing authority and then the one last item of change in order to incorporate the design summary package that we all know to fill out and submit, that in our opinion actually needed to be revised within the sanitary code itself as opposed to in the 10 state standards, or whatever that's going to be called, document. That's the report. Pretty upfront and simple unless we have some additional comments, which I'm sure we will.

J.T. LANE: Open it up.

PATRICK KERR: There's a couple things I think Dr. Guidry you're going to wear your hand out unless we put your representative in here, someone authorized to sign off on all this, or your designee. I think we need to do that. We had talked months ago about having, and I think Chris brought this up, it's done elsewhere, almost a blanket permit for certain types of projects, main extensions, things like that that really I think would reduce the load of the reviewing authority significantly. If you could

certify that this project meets the requirements of a blanket permit it could be installed and then if the reviewing authority found it to be noncompliant could change it and that would be a risk you take as an owner by installing before a permit is issued. But I really think things like minor main extensions, increasing the sizes of mains where mains already exist could be very well covered with a blanket permit and we reduce your load. The other side of that though is there's still nothing in this that gives you as a reviewing authority a time limit to issue the permit. And it's something we're still having a lot of problems with. Take 90 days to get back comments on a set of plans which is still happening and then restart the clock at 90 days again. We can't take 270 days to put a project in. We need to figure out a way to address that. I'm open for suggestions. I know we've been fighting about that for a long time.

JAKE CAUSEY: So there is a statute that requires reviewing plans within 60 days for water and sewer. That certainly does exist. So one other comment was in here talks about submission of plans for maintenance and replacement of existing facilities in kind shall not be required. So we do currently have language in the sanitary code about when a permit is required and not required. And so I guess, I think that's what this was trying to get at. I think the language that we have in the code currently is what we should stick with. Under that I think effectively the same things, meet the same criteria. I think the wording as far as changes that affect water quality, etc. I think is better worded. Effectively though in kind still meet that same criteria, not require a permit.

PATRICK KERR: I think the sanitary code now doesn't say water quality it says hydraulic improvements, I could very well be wrong.

JAKE CAUSEY: Says quality of the water produced.

PATRICK KERR: A project that doesn't produce water, like replacing a main, if I replace it with a bigger main, a hydraulic change, the way we always interpreted it, (inaudible) but that's another thing. I think we can deal with a blanket permit. We go out and replace (inaudible) cause we're doing relocation, highway improvements, I don't know why a permit is required for that.

CHRIS RICHARD: The permit in Florida has certain minimum requirements that the engineer has to certify that he met. The sanitary features (inaudible) you have to check them, if you don't comply you put an X and explain why you didn't comply with whatever that provision was. And there's two places that you have to stamp to certify that on the application and the owner has to sign and we'll get the permit turned around in a week. Basically putting the responsibility on the engineer. It's his stamp, he's certifying that it's done. His responsibility to make sure.

JAKE CAUSEY: I wasn't speaking in regard to blanket permitting. I was just speaking in regard to the revision in here, but what it says is no public water supply shall be here after constructed, operated, or modified to the extent that the capacity, hydraulic condition, treatment processes or the quality of finished water is affected without an exception in accordance with a permit. Blanket permitting is a whole different complication.

J.T. LANE: With regards to your comments about the review time there has been a budget reduction obviously in the last couple of years, but what we are doing though is trying to consolidate. We currently operate with 22 different IT systems within environmental health alone and so we are consolidating them into one and overhauling that entirely. We do expect there will be efficiency gained by the staff not having to work through so many different systems. I think that's the first step we are taking. We are looking as we have retirements in certain areas where we don't need additional sanitarians. We need additional engineers for plan review. We are switching resources to that. We have seen and noted the impact of the cuts that there would be delays. And so we've been trying to mitigate that as time has passed in terms of staffing. With the digital health department which we just got approved, the name of the program is digital health department. Totally focused on environmental health. Everything from water system work to restaurant work, everything in one place from an environmental health standpoint. A significant step forward to do away with a lot of these legacy systems that are going to make us more efficient and save money too. I wanted y'all to know that is in progress. We just got approval last week to move forward in the implementation of

that. Working through the final timeline for that and it should be done before the end of the year, the calendar year.

PATRICK KERR: I guess the question is would the department entertain language, if Chris I can volunteer you, that would establish in this part expedite handling of common facility improvements. We don't need to call it a blanket permit, but certain projects I think should have expedited handling. A short form permit process.

ROBERT BROU: Restricted to distribution system improvements, nothing to do with water capacity, water quality, pretty basic stuff.

PATRICK KERR: The other thing I'd like to put in here is some teeth about removing equipment once it's permitted. I think things like iron manganese removal systems once they're permitted should be operated and not move. But we need to put some teeth in that. I can't imagine anyone would ever do it.

JAKE CAUSEY: Not a water quality issue, right?

ROBERT BROU: What about his comment about every place we put reviewing authority replace the word state health officer?

JAKE CAUSEY: I think the state health officer is defined as a definition in the code. It says certain cases (inaudible) and in some cases designee so that's following the theme throughout the sanitary code.

J.T. LANE: Typically what happens from a workflow standpoint is that if there is any appeals or response to letters that may get disapproval or changes requested, that sort of thing, anything that gets to that point elevates through the initial review and stuff like that as long as, anything between the system engineers and engineering staff typically doesn't elevate to us. It's only when there are requests for variances and what not that come through us.

PATRICK KERR: I guess we can go over this next time for real, this is the first we've seen it, right?

J.T. LANE: Yeah, we'll review the changes requested plus what you've outlined and then provide a side by side, but if there's anything else we have an hour and a half.

PATRICK KERR: 1.2.2 G. I'm thinking about the Elk River in West Virginia. I don't think you can put the responsibility on the water system to find all existing and potential sources of contamination. I think we might have to report known locations, but that's part of the litigation that's going on up there that the water system didn't know what was being stored and the facility wouldn't tell them, they had no power to find out. If you would just say location of all known existing and potential sources. The other question is laboratory facilities and equipment. I know we fought about this months ago for all new plants. EPA considered each pumping station like we own to be a plant. UCMR or other rules, each individual pumping station is a plant. We don't have laboratory facilities in each of our plants, don't intend to put them in the new ones, so I think we need to do some work on that. 1.3 B. May be laboratory facilities which are required based on newly installed treatment techniques or whatever shall be provided. We contract a lot of our laboratory analysis and this would require that we, I don't know what purpose it serves. We got to report what we need to report and if we don't we're going to get hammered.

RANDY HOLLIS: You can't simply insert the word treatment before plants because we're adding chlorine, we're adding ammonia and that's considered treatment. So the word treatment doesn't solve that.

CHRIS RICHARD: Contract it out you don't have it onsite anyway. You're meeting the requirements, but not providing a lab onsite.

PATRICK KERR: Is there a reason that y'all would like that language to stay?

JAKE CAUSEY: There is an approved lab requirement as well from EPA as well as us. So what we can do is we can look at this and see how that lines up with the approved lab stuff and bring it back and make sure it all meshes together. We agree, you don't need a lab at each pumping station.

GREG GORDON: There's another part you already did that, you can probably just use that language. I don't remember where it says something about where you can use approved labs.

JAKE CAUSEY: Noted, we'll try to clean it up.

PATRICK KERR: And then 1.6 the last paragraph, we fought about this a lot months ago. This is the do

whatever you want paragraph for the state health officer. The etc. bothers me. Anyway, we need to do some work on that.

J.T. LANE: Can you give us some general principles that we can start with right now?

PATRICK KERR: I think you all need to tell us what we might need other than what's in here. I think the argument that was made months ago was that we're spelling out everything that the health officer requires for submittal of plans and then at the very end we say and anything else we might ask you for, why are we doing the work? We need to figure out what you need and do away with 1.5 or if you need to add something in this committee, which is a standing committee, you should add it.

JAKE CAUSEY: And I'll say I don't believe that any of us here today can foresee on every possible project that we may review the next 10 years every single piece of information that would be needed. I think that's unreasonable.

CHRIS RICHARD: But you can request it without putting it in the code. And the other problem, for instance, proprietary technical information or we've had requests for pump curves. We don't have a pump curve till we have a pump. You're bidding it and have requirements once we have a contractor through the public bid law you select a contractor, he submits it, then you have a pump curve. That's long after plans have been approved. So you can't provide certain things at plan submission. Technical data, I may have three clarifying manufacturers approved. I want to clarify; I don't know who it's going to be yet. I can't submit that technical information till after I have a contractor.

JIMMY GUIDRY: What it sounds like to me is there's things we have to have to make decisions and whether this language is here or not it doesn't matter. You're not going to get your permit without us getting what we need. So what it really boils down to is we need to have a process that if you can't provide it, or a logical reason why it doesn't make sense, we ought to have a discussion of why we're asking for it. If you can't provide it, why are we demanding it? There ought to be a way to say okay it's delaying our project because you're asking for something I can't provide. I think the whole intent is to make sure we don't delay the process because it's too expensive to be sitting there

waiting on a delay because we don't have, because we disagree, because you're not doing it the same way. We need to have a process on how do we address those things which are delaying a project. If we have 60 days to give a permit many times we send it back, we don't get information, we don't hear anything and all of a sudden somebody turns the heat up and it's like oh, it's urgent. And six months went by and it wasn't anything we sat on, somebody didn't give us what we needed. And then they might come back and say well we don't have what you need. Well we should address that six months ago. There needs to be a quick process when something's not approved, where somebody's disagreeing with what they're asked for that we have a discussion. Or Jake tell me if I'm wrong, I think that's where we get a lot of hang up. We hear about it months later. Somebody didn't turn something in, or didn't know what they needed to turn in, or they didn't agree that they needed to turn it in. I understand why there would be a lot of grief because it's money being wasted while we're waiting. I don't want to drag it on. I want to expedite it. I want to make sure it happens appropriately, but again I think it's a process we all have in place.

PATRICK KERR: Dr. Guidry, that might bring up the issue there's no real appeal process. If we reach an impasse I don't know how it gets resolved, but the real issue I'm trying to raise on this 1.6 is there's a process to change rules in the administrative procedures act and I think we should go through that process if we want to change the rules and adding to the requirements is a change to the rules. So we need to make sure the submission of plan requirements are beefy enough to cover us and not have something in there that says and anything else that the reviewing engineer may ask for. We give you everything you asked for. If I'm doing something that's never been done before in the state you may have to provide additional information, but I mean even exactly why do you need, the examples there that are used in here, copies of deeds, and copies of contracts, I can see contracts. Why do I need to prove to the reviewing officer that I own the land. I might be leasing it. Why do you care? If I don't control it and somebody sues me I lose the facility. I guess my point is we're kind of by-passing the EPA by saying and you can do anything else you want to cause there is a provision

in the sanitary code that says if there's an acute issue you can deal with it immediately. This is more like routine submittal of plans and somebody asks for something we've never done before.

JIMMY GUIDRY: What I see with regulations and policy when you do rule-making that's a month, that takes months to happen unless you do emergency rule. If you have anything new that you want to weigh in or change the rules that is not a good process, in my opinion, to address health. Literally what you're asking for is to be clearer on what it is we're looking for and to have a list of what we're looking for. And there are some things that we don't think of that's probably a pretty long list if we have to think about every possibility. I think that's where the issue comes in. That list is not something that we can exhaust. I think we can do a better job of having a checklist, I think what we're asking for. I think we should do a better job saying this is what we look for, and maybe a better job of why we look, maybe we need to explain. Jake, you're going to have to tell me, I think that's an issue for people.

J.T. LANE: Maybe what we can do is do a review of maybe (inaudible) of plan review and see what additional information we have asked for historically so we can provide a better list.

JAKE CAUSEY: I can certainly think of situations where, for example, copy of a deed. Didn't ask for it, but we should have. We were told they owned it, but at the end of the day maybe they thought they did too. I don't see that as something we would necessarily routinely ask for, but frankly dealing with some systems and circumstances we've had I certainly would intend to on future projects in some of those developments. Proprietary technical data, yeah especially we've got manufactures and chemicals wanting to try some latest greatest product all the time, but it's proprietary. Those things come up. We have lots of new technologies trying to be applied in the drinking water industry that you're not just really going to be able to wholesale cover. But I think on a routine basis we can definitely provide a good summary checklist or something that would be excellent. But certainly there are going to be differences that come up all the time where we're going to need additional information. It's just what happens. You shouldn't be submitting plans by any stretch and every

project you get requests for something different. If it is a lot of different requirements or something like that on every project, then that's obviously a problem we need to straighten out. The routine should be the routine.

JIMMY GUIDRY: I had the experience when we do contracts there are contract rules written in law that people that review the contracts and no matter how many times I do it and they tell me this is what you need, check this list, check this list, every time I sit with them they think of something to add. And it's so frustrating because well we didn't add it six months ago, why are you adding it now. Well they went back and read it and realized they should have been asking for it. There's a lot of reasons that if we keep moving that dial, but it can't be a moving target. Man, I share your frustration. It's got to be more obvious what you're looking for and why you're looking for it and their exceptions. And those shouldn't be so many that every time you do a plan it's another exception. That's got to be frustrating. You think you crossed all your T's, dotted all your I's you turn it in and you're ready to roll and it gets pushed back and you don't even know why.

CHRIS RICHARD: One thing may be more of a procedural thing I guess that would be useful, and some of the districts do it, rather than send a letter saying your plans aren't approved because I need this, this, and this. Put it in the mail, I got to get it in the mail, go through the office, and I got to redo it and submit it. Call, pick up the phone, ask the question, email me. I will get it to you within five minutes so you can complete your review without having to put it aside and start over. When you work with the districts that do that you get your plan reviews like that. And the ones that do that it does go faster.

GREG GORDON: I just think with this you don't want to get into ROTD which is rule of the day kind of situation. Unless you want to put in order to expedite a permit.

JIMMY GUIDRY: If you want to eliminate that section to make you feel better, it's fine. You're still just going to get your permit when we get what we need. I'm okay without stating it. I'll tell you every state employee, this is really interesting, in their job description at the very end in the print says

whatever's needed by your supervisor. And it's not clear what that could be. It might be showing up at a shelter taking care of patients, it's never clear. It allows you the flexibility to take care of things. If you don't want it there, you don't like that flexibility I still think we're going to have to have certain data to give a permit. I think we need to make that easier and clearer. I understand you're frustrated.

SIDNEY BECNEL: Not to beat a dead horse, but today in two spots we put when necessary you either need two pumps at a pump station or you need backup power supply to maintain 20 PSI, but if it's a brand new system how would the plan reviewer know when necessary?

PATRICK KERR: Hydraulic calculation.

SIDNEY BECNEL: Right, but that section you want to amend it talks about hydraulic head, I don't know if that's the right word or not, but we need that.

PATRICK KERR: I agree, that should be in the plan submittal as a necessary calculation.

SIDNEY BECNEL: But if they didn't submit it?

PATRICK KERR: Then they have an incomplete set of plans.

SIDNEY BECNEL: Would it be a contest between the state and that engineer?

PATRICK KERR: Unfortunately it happens to us all the time. Usually not your fault. It doesn't happen all the time. But yeah, incomplete just like if we didn't specify the limits of our treatment pumps.

J.T. LANE: Any other comments on the work that Keith presented?

PATRICK KERR: I guess I didn't hear an answer. Would you guys entertain putting that checklist type for distribution improvements permits in this?

J.T. LANE: The Florida example.

PATRICK KERR: Right. Would the department entertain that?

J.T. LANE: Sure, we absolutely should.

JIMMY GUIDRY: Anything that makes our lives easier. I have to be honest, not anything against engineers, there's always bad apples. People that just don't do what they should. They put their

stamp on it doesn't mean they are doing what they should.

CHRIS RICHARD: There's remedies for that. And along those lines I would also change where it says about the engineer it says somewhere about the applicable in the state under 1.2.1 has to be a Louisiana engineer. I would specify that on I, 1.2.1 says requirements of the individual state.

JIMMY GUIDRY: And I have a question on this whole section, and Keith may be, by stating at the very beginning for all new facility construction. Does that mean that submission of plans only applies to new facilities?

CHRIS RICHARD: Could be a waterline the way I read it. Anything that's new you have to submit plans for.

JIMMY GUIDRY: So it's facilities or new construction?

PATRICK KERR: We're saying anything, improvements to the facility, a new waterline, new pump.

JIMMY GUIDRY: I'm just curious if that language let's these people believe a facility is a structure or facility.

GREG GORDON: Define facility somewhere and define state health officer.

CHRIS RICHARD: Waterworks construction.

JAKE CAUSEY: Again, we do have language in the code that talks about when a permit is required. It's not just a new facility, but it can be modifications of existing facilities as well. It's something we're going to look at. Look at what's in the sanitary code and try to merge it all back together.

J.T. LANE: So everybody should have a new copy of what Caryn edited for chapter 6 pumping facilities. And while we are looking at that I just want a chance to discuss before we move on to the last discussion on that and potential vote I want to go ahead and do since we covered part 1 and part 6 to open it for any public comment anybody would like to make for the meeting today. No comments. So I'll give y'all a couple minutes.

JIMMY GUIDRY: We need a slight discussion at the very beginning about, go back to subcommittee status and our goal whether we wanted to speed up the process to get this done by extending our

meetings. All I want to point out is different parts, some more complicated than others, take different amount of times. We're going to have to have some kind of timeline trying to get some of this stuff done. Literally I think there's some committees that might not met for some time. If you start looking at the gaps here where work needs to be done, especially for those chairs, I just want to remind you we have some catching up to do, not just the department, but the whole committee. If we're going to have one every month and extend it to try to do two in a month we've got some work that needs to be done. We didn't discuss that, but having a longer meeting if we don't have the work done is not going to make us finish any faster.

J.T. LANE: Any comments on the changes to chapter 6 that we discussed?

RANDY HOLLIS: I have one comment. I'm searching for a word, and Chris you brought this up, under 6.3 introductory paragraph the last sentence of that shall be capable of providing the maximum design capacity of that system.

PATRICK KERR: Of that station.

RANDY HOLLIS: That works. Of that station. Thank you.

ROBERT BROU: Under 6.4.3 where we have inline booster pumps we separated out what we thought should apply, do we need to take out the beginning of that first sentence in addition to other requirements of this section. Just put that inline pumps shall have. That way you're not pulling in the negative pressure of 20 PSI, you are, but you're not doing the negative pressure and all the other stuff.

PATRICK KERR: Standby generators, kind of loathed saying this, but one of the lessons we learned in Katrina was having enough fuel to operate, that's critical. There's no provision in this about number of hours we need to provide or anything like that. I don't know if you want to go there, but it was huge for us. We burned about 10,000 gallons a day after Gustav. We learned that lesson in Katrina thank goodness, but I don't know if you want to put something in here that requires, and it can't be a contract because what the contract says sorry we just had a hurricane. Just think about it. It's going

to suck for us, but it needs to be in there. Y'all think about it.

GREG GORDON: From our prospective in St. Tammany we can't get a fuel provider to sign a contract.

PATRICK KERR: We do it ourselves for that reason.

JIMMY GUIDRY: What do you mean do it yourself?

PATRICK KERR: We have tank trucks and access to the facilities that download fuel across the river. The other option is to make sure you have 72 hours or 48 hours of fuel. 72 hours. Gustav we lost 79, 80 wells. 72 hours might be good.

SIDNEY BECNEL: Under 6.2.1 when we defined suction wells excluding particularly clear wells and if you notice before we took clear wells out we said clear wells had to be covered otherwise protected against contamination. I'm sure the intent we still want clear wells to be covered, but what other section covers clear wells is my question?

CHRIS RICHARD: Storage.

SIDNEY BECNEL: Under storage, under existing code then we might have to amend 337A unless--

JAKE CAUSEY: I think you're talking about part 7.

SIDNEY BECNEL: No, I looked under storage in part 7. Doesn't seem to address the sanitary aspect.

CHRIS RICHARD: It says on 7.03 protection from contamination all finished water storage structures shall have suitable water tight (inaudible) which includes birds, animals, insects, and excessive dust. Chapter 7. Part 7. We didn't get to it yet, but that's what will cover it. I think we're okay.

J.T. LANE: Any other comments on the draft? At this point I would like to entertain a motion to approve part 6 with two changes to the draft. On 6.3 the first paragraph, second sentence ending with station instead of system. And then under 6.4.3 inline booster pumps removing from the first sentence in addition to the other requirements of this section. Start with inline booster pumps shall.

ROBERT BROU: One more, under 6.2.1 the definition.

J.T. LANE: All right, so that is the motion.

PATRICK KERR: I second.

CHRIS RICHARD: I'll second.

J.T. LANE: Any opposed? All right, chapter 6 is approved. All right, with that any other comments, questions about anything we discussed today? We'll go back and look at the schedule and see where we can propose longer meetings and what we will cover to take advantage may be more complex parts so we don't have to have additional meetings. And we'll get that out to you next week. All right, with that do I have a motion to adjourn? Thank you.