Water Committee

August 29th, 2017

CARYN BENJAMIN: For August 29th, 2017 water committee meeting on Louisiana standards roll call. Dirk Barrios (absent), Vern Breland (absent), Ben Bridges, Robert Brou (absent), Jeffrey Duplantis (absent), Greg Gordon (absent), Jimmy Guidry (absent), Jimmy Hagan, Randy Hollis, Patrick Kerr, Amanda Laughlin, Rick Nowlin (absent), Rusty Reeves (absent), Chris Richard, Keith Shackelford, Cheryl Slavant (absent), Joe Young (absent), David Constant. We don't have a quorum.

AMANDA LAUGHLIN: You wanted to go over Randy's questions and Pat has a couple comments as well.

RANDY HOLLIS: Really wasn't that many. We were not consistent on the 100 year BFE. It appears that we agreed to a 2 feet above the 100 year BFE on everything. But in some cases we said 2 feet above the 10 year. And then top of reservoirs was just BFE. I listed five places where we have the BFE called out. I think Caryn you have them up there. Go to page 26. That's the first one. We state in those places this is for wells we have 2 feet above the 100 year BFE. That's consistent. So if you go down to D right below that. No, I'm sorry B. Those were just saying we're consistent 2 feet above 100 year. Now go to page 30. Page 30 again we're consistent with 2 feet. Now go to page 83. The first change that we have

we say 1 foot above 100 year. We're looking for 213 A1. You must have changed it. We had 1 foot above the 100 year. My suggestion was change it to 2 feet above to be consistent. Page 86 of 109. Electrical controls. That's where we say 2 feet above the highest flood level which may have occurred in a 10 year period.

CHRIS RICHARD: I think it's a typo.

RANDY HOLLIS: If we say 2 feet above the 100 year.

PATRICK KERR: So these are all just technical changes.

RANDY HOLLIS: What was written was what was proposed. The last thing is page 87 of 109. Under D1 ground level reservoirs we're saying shall be protected from contamination for 100 year flood elevation. So we don't say 2 feet above there. No now we do say on 3 you'll see 2 feet above ground surface and then on K4 and 5 what we say there is any accesses. There you go, vents. Vent goes over shall be 24 inches under 4, shall be 24 inches above the roof. That means if it's a metal vent you're going to have that water tight so the reservoir's 2 feet above the BFE. Do we want to make the top of a reservoir 2 feet above the BFE to match everything else?

CHRIS RICHARD: Could you just say protected to 2 feet above the BFE.

RANDY HOLLIS: Go back to D1 ground level reservoirs shall be protected from contamination.

CHRIS RICHARD: Two feet above the 100 year BFE.

RANDY HOLLIS: However they want to achieve that they can.

PATRICK KERR: So the roof could still be below that 2 foot as long as all the appurtenances are protected.

RANDY HOLLIS: Okay, that's all I had. I was just trying to be consistent throughout the document. There may be other places I didn't catch. Let's go over some of my other questions real quick. The very beginning of this 101A page 2. Says 10 state standards repeal. In other words, that means we will never use 10 state standards guidelines again. So someone can't pick them up and say well it says this. I'm sorry these standards govern from now on and so 10 states no longer has anything to do--

CHRIS RICHARD: Well they're not incorporated as part of the code anymore like they were.

CARYN BENJAMIN: For 101 the definition is being repealed from 10 states. But the intent of this rule making is to rely on this as the design standard and not 10 states. And that's when you go into 105 and you'll see that 10 states that section has been stricken.

RANDY HOLLIS: Page 3 of 109 section 101 D. Permits. Under D detailed plans specifications shall be submitted by the person having responsible charge of municipally owned public water supply or by the owner of a privately owned public water supply. In Mississippi I have to submit permits through the city, they have to sign it, and then it goes to the state. It

can be a protractive process of trying to get somebody to sign it. This does not allow an engineer of record to submit it. And I would prefer that we add in there allowing the engineer of record to submit detailed plans and specs. And it can be and/or however.

AMANDA LAUGHLIN: Yeah, I would say or.

RANDY HOLLIS: Shall be submitted by the engineer of record or. So after the word submitted put by the engineer of record.

CHRIS RICHARD: Cause it gets really complicated if a developer is putting in a water system would have to get the city to submit the plans for him. That would never happen.

RANDY HOLLIS: You're right. I hope y'all agree with that. Under page 18 of 109 section 161B flood protection. Under B I couldn't understand that sentence. Shall not be construed to allow existing water systems to be inaccessible during flooding conditions. I tried to reverse the negatives and it just didn't make sense to me. The way I suggest we write it is the owners or the person in responsible charge shall ensure that existing water supply facilities shall be readily accessible by some means during flooding conditions. That follows under C.

PATRICK KERR: We need to put critical like we did with the others.

RANDY HOLLIS: That's fine. C allows you to use boats, vehicles and other things to get to them.

CARYN BENJAMIN: Being these new standards are going to apply to new systems or new parts of systems we need to strike this for this rule making. I can add it during the 319 amendment to adopt the additional.

CHRIS RICHARD: This is when we were having design, sanitary. We had that whole thing that doesn't anymore. This is just design standards. So if it's not there.

PATRICK KERR: Caryn's right. We can strike that. It's covered by A and C.

RANDY HOLLIS: It is covered by those. I was just trying to make sense of sentence B and I couldn't make sense out of it. That's fine. Page 24 of 109. 169 D1AII. This is note one. Note one still says we can protect cast iron with leaded joints. I don't like cast iron because it's brittle and it can fracture and then you're nowhere. I would prefer for note one to at least be brought into this century by saying the sewer is of ductile iron pipe. And I added with an internal protective ceramic coating with external corrosive protective coating and with water tight joints. That gets you ductile iron with a protective 401 on the outside with a polyethylene on the outside to protect it from corrosion. So if we're going to bring this up to the standards we need to do that and get rid of cast iron.

CHRIS RICHARD: The only problem is would that ever happen because this is for citing a well which means the sewer's

already there. And so they would have to go and put ductile-- they're going to put things that they wouldn't normally put anyway unless they're anticipating a well to be cited there. Or do you have a problem with just a ductile iron pipe? Cement water line, ductile iron pipe.

RANDY HOLLIS: Cement water line is okay, but if you don't check the outside of it it's going to corrode.

CHRIS RICHARD: It depends on where it is. I have cast iron been in the ground for 60 years and it looks brand new.

RANDY HOLLIS: I have some ductile that's been in 5 years and it's gone.

CHRIS RICHARD: That's my point. It depends on the circumstances.

RANDY HOLLIS: But if I'm going to err I'm going to err on the side of being conservative.

CHRIS RICHARD: Then what I'm saying is that will never happen because this is for locating a water well. The sewer is already there so someone had to have the foresight to say I'm going to put sewer, I'm going to make it out of ductile iron pipe, I'm going to put protecto 401, I'm going to protect the outside in case somebody puts a well. Well that's not going to happen so you'll never have that variance happen.

PATRICK KERR: How about we just leave it at ductile iron with water tight joints.

RANDY HOLLIS: That's fine.

PATRICK KERR: Otherwise we can start specifying all other kinds of other pipe too.

RANDY HOLLIS: Individually I will put it in like that.

PATRICK KERR: Could we say this is being reduced to 30 feet on a case by case basis by the state health officer and then you can specify whatever you want.

RANDY HOLLIS: I'm scared to death some young engineer won't know what they're looking at.

AMANDA LAUGHLIN: No. If you make that statement then you'd have to put in parenthesis example.

CHRIS RICHARD: Would you put schedule 40 or maybe C900.

PATRICK KERR: Exactly. Or C901.

RANDY HOLLIS: If you wanted to put C900, 905 doesn't exist anymore.

BEN BRIDGES: That gets cloudy.

JIMMY HAGAN: Just call for pressure rated pipe.

AMANDA LAUGHLIN: If you leave it as is that's the only time you're reducing it to 30 feet.

RANDY HOLLIS: I like what Jimmy said. Pressure rated plastic pipe and just leave it at that. Just put pressure rated. Take schedule 40 out and put pressure rated. Let's go next to 169D2. Continued sanitary protection of the well. What I wanted to add to this is is it talks about how you're supposed to protect from contamination and all this stuff and then it says ownership shall be provided through either ownership,

zoning, easements, leasing or other means acceptable to the state health officer. What I wanted to add to this which shall be maintained for the life of the well until the well is ultimately properly abandoned. What if properties are sold and somebody misses it. I just like to make sure that we have protected that for the life of the well.

KEITH SHACKELFORD: What if they go back and change the distance in the regs?

PATRICK KERR: You don't have control unless it's a permitted easement would be control. If the person who gave it to you has the authority to change it you don't have control. So this is adequate. My point is if somebody else controls it you don't have control. If you can take away an easement you granted me, which is a right in real property, then I didn't really get an easement. If I control it that means you don't get a vote former land owner. We do it with servitudes all the time.

RANDY HOLLIS: I would love to see it in there just so they know it has to be maintained for the life of the well. I understand what you're saying legally, but I like to put in there has to be maintained for the life of the well until the well is properly abandoned.

PATRICK KERR: I have a real property interest in that controlling document.

RANDY HOLLIS: But this will help maybe somebody that's buying

it to make sure that's in that property that they're getting the easement.

PATRICK KERR: If I don't have it in writing there's no such thing as a verbal agreement in real property. I don't have control anyway.

AMANDA LAUGHLIN: We would not approve it without a legal document that's been in the courthouse, signed and all that good stuff.

RANDY HOLLIS: It doesn't hurt to put it in there.

PATRICK KERR: I don't maintain the easements that I have, the land owner maintains the easements. Do I need to maintain the property now if we put this in here.

CHRIS RICHARD: The radius of control is what I think he's trying to say you're maintaining.

PATRICK KERR: That's fine. Let's leave it.

RANDY HOLLIS: Let's go on to 177C11. I don't know diatomaceous earth filters other than there's one (inaudible) my parents. Never put one in. If we go to C11 page 46. Right above that number 11 it is recommended the following be provided. And when I read those I'm going wait a minute, this looks like this is for every filter, not just for diatomaceous earth filters because some of these don't appear in any of the other filter requirements. I'm not sure who was in charge of this one, but was the intent of this--

CHRIS RICHARD: I don't know what it looked like before.

RANDY HOLLIS: That's a good question. I got 10 state standards here.

PATRICK KERR: This is a recommendation, the whole thing?

AMANDA LAUGHLIN: Right, the whole thing says recommended.

RANDY HOLLIS: It's not exactly like 10 state reads at all. The only thing similar is throttling valve. And the other ones are not part of that.

AMANDA LAUGHLIN: Some of those I think we added to multiple sections possibly.

PATRICK KERR: Says for every filter right above that. Look what 10 says, shall be provided for every filter.

RANDY HOLLIS: But that's under C. That follows 10 state standards right there exactly.

CHRIS RICHARD: Where is 11?

RANDY HOLLIS: Eleven doesn't show up under 10 state standards.

CARYN BENJAMIN: This should be it.

RANDY HOLLIS: Okay.

CARYN BENJAMIN: The formatting had to change in a lot of cases. Eleven didn't exist. It was part of 10, 10B.

RANDY HOLLIS: My only question is there are things in here that don't show up in any of the other filters like 1 to 1.5 inch pressure hose storage rack don't show up in any other filters. This looks like somebody was trying to make this applicable to all filters, not just diatomaceous earth.

CARYN BENJAMIN: It is under C. But I can explain it better

by adding in the following is recommended for diatomaceous earth.

RANDY HOLLIS: It's under that section.

CARYN BENJAMIN: Do you want it to apply to other sections?

RANDY HOLLIS: That was my question for the committee is should this apply for all sections.

PATRICK KERR: It's required in one place and recommended in the other.

RANDY HOLLIS: We can leave it there. It just looked like the intent somebody was trying to put it in all filters. Somebody can certainly put it in if they want to later.

BEN BRIDGES: If it's recommended it would be ideal to put it for all filters recommended but not required.

RANDY HOLLIS: When I read it it looked like it was supposed to apply to all filters. But then it doesn't need to be there because we have slow sand filters below it. So do we move it to another section.

CHRIS RICHARD: If it's recommended you can take it out.

RANDY HOLLIS: You sure can. We can delete the whole section.

CHRIS RICHARD: I'd rather do that than move it cause I think there's going to be unintended consequences.

RANDY HOLLIS: Is there something above that that you would want to leave in as a requirement since the section above it is a shall.

PATRICK KERR: Leave 10, right.

CHRIS RICHARD: Strike 11.

RANDY HOLLIS: Is there something in 11 you would want to move up to 10?

CHRIS RICHARD: C is already in 10.

PATRICK KERR: I think you just strike 11.

RANDY HOLLIS: Let's go on to section 179 C. Page 51 of 109. This is a question for my lack of knowledge. Number 2 for treating surface waters and ground waters under the direct influence of surface water of the system shall be designed to meet the CT standards set in chapter 11 of this part. Is there a CT for ground water?

AMANDA LAUGHLIN: Yes.

RANDY HOLLIS: Where does it say that? Should you specify you have to meet it for ground water.

CARYN BENJAMIN: It's only if you have well contamination. It's not necessarily a requirement all the time.

RANDY HOLLIS: So I can put a well with no retention time or CT.

PATRICK KERR: Do it every day.

AMANDA LAUGHLIN: Contact time, not CT like surface water treatment.

RANDY HOLLIS: So for ground water, a brand new well I have to have 30 minutes contact time.

PATRICK KERR: No, you do not. That's not true.

CARYN BENJAMIN: It's in the code.

PATRICK KERR: New wells.

CARYN BENJAMIN: If it's part of a new system, yes. But I guess if you're an existing system, you put in a new well, it's not a requirement.

PATRICK KERR: That would be a huge change and I don't know what purpose it serves. When we get hits under the ground water rule we have to correct the problem. If the problem is the source CT may be the solution, but until you've demonstrated a problem you don't have to do it. Anytime we get a coliform positive in a system you have to go back to the source and sample. And if we have a positive fecal we're going back to the source and we have to fix the problem. So CT is one solution.

AMANDA LAUGHLIN: And sometimes we do have systems that want to meet CT standards on the ground water, but it's monitoring issues for the ground water rule. Usually comes back to the ground water rule.

CARYN BENJAMIN: Some of your wells do CT.

PATRICK KERR: We're building big manifolds. It's crazy because you allow for plugged flow in a 36 inch pipeline, but not in a tank. That's okay, we'll talk about that some other time. We're manifolding and getting CT time at some of our sites.

RANDY HOLLIS: Okay. Let's go on to page 51 of 109 down below 179D. This references 355 and 357 of this part. Those don't

exist.

PATRICK KERR: They're in part 12.

CARYN BENJAMIN: The part refers to part 12 so that's all of water supplies.

RANDY HOLLIS: If y'all are comfortable the way it's referenced, okay. Under part 12 that I've got title 51 I couldn't find those paragraphs anywhere.

PATRICK KERR: The whole emergency rule 355 and 357.

AMANDA LAUGHLIN: It's not necessarily listed in there cause that's the additions to part 12. I don't necessarily think everything's printed from all of part 12. He's saying he can't find 355 in his booklet, but we only included the rule making part. We didn't give you all part 12. But if you go to the sanitary code right now 355 and 357 is our disinfection rule.

RANDY HOLLIS: When we list the page numbers of the bottom of this those are not correct for the final because it won't be 109 pages. It will be a lot more than that.

PATRICK KERR: No. We'll only publish the changes. In the registrar it will just be the changes.

AMANDA LAUGHLIN: When it's published into the current part 12, yeah, it will be larger than 109. All of part 12.

PATRICK KERR: Like part 1 of this the definitions is more than just that one. It's the only one we changed.

RANDY HOLLIS: When I read this and look at the beginning of

it it states title 51 public health sanitary code part 12 water supplies. As though this is inclusive of everything. And it even lists all of the chapters and everything. So when you reference something like this of this part it's not in what we have. So legally if it's fine I'm okay with that.

CHRIS RICHARD: The final publication is the entire document so it's correct at that point. These are just publishing the changes. The final document will be the whole thing.

CARYN BENJAMIN: These are the effective sections of the code that are being amended.

RANDY HOLLIS: Okay.

CARYN BENJAMIN: That is one point to make, subsequent rule making will involve code clean up of any conflicts or redundant material.

RANDY HOLLIS: Let's go on to 179F2. And this is one of those things we covered just a minute ago, but do we want to change it or not. Pipe material. We talked under vacuum piping shall be polyethylene tubing or PVC pipe and then we talk about rubber PVC polyethylene. This is a pet peeve of mine, but I hate to see people use schedule 40 or lighter PVC pipe on any type of chlorine application. It's a cheap pipe, it's degraded by sunlight. I like schedule 80 and I think we'd be remised not requiring schedule 80 for anything involving chlorine. I would put after polyethylene tubing or schedule 80 PVC pipe and then rubber schedule 80 PVC polyethylene.

AMANDA LAUGHLIN: What's the cost difference?

RANDY HOLLIS: Nothing. When you're doing little sections, nothing. Most reputable people that's all they're going to have on their truck.

BEN BRIDGES: Most of ours only use schedule 80 anyway so I think it's understood and assumed that's what we're going to use.

RANDY HOLLIS: After PVC on that sentence rubber schedule 80 PVC or polyethylene. Shall be or after PVC. Let's go to page 72 section 203J4. And I don't think this needs to be changed, I just want to make sure we're on the same page. Bulk liquid storage tanks. Under number 4 liquid storage tank shall be kept covered. I got alumn tanks sitting out there that have a top on them, they're not covered.

PATRICK KERR: They are covered. They have a top on them.

RANDY HOLLIS: While we're here I want to make sure we all understand I don't have to put a cover over a bulk tank across the top.

BEN BRIDGES: A shade.

RANDY HOLLIS: So to say shall be kept covered doesn't mean I have to put a cover over it.

AMANDA LAUGHLIN: It means it has a lid on it.

CHRIS RICHARD: I agree, but that's not the way it can be interpreted because when you say the tank is kept covered, kept covered means over the tank, not part of the tank.

RANDY HOLLIS: Exactly.

CHRIS RICHARD: The way it's reading somebody is going to say no you have to put it in a building.

BEN BRIDGES: Which would enhance the life of the tank drastically.

RANDY HOLLIS: I have one that's 32 years old sitting out there right now. It's fine.

CARYN BENJAMIN: The second sentence appears to cover it. Shouldn't we just strike that first sentence?

PATRICK KERR: Should we say closed.

AMANDA LAUGHLIN: Then you're saying it has to be in a room.

RANDY HOLLIS: If the intent there is liquid storage tank shall have a top. Can we say shall have a top? Liquid storage tank shall have a top. I know that seems elementary but.

CHRIS RICHARD: The top of the tank where it has a cover it's still the top.

PATRICK KERR: Do you just want to say sealed against infiltration.

RANDY HOLLIS: No, I just want to make sure some young engineer doesn't interpret this and I get a letter back not approved because I didn't have a tarp or something over my tank. Liquid storage tank shall have a top.

CHRIS RICHARD: A lid.

PATRICK KERR: Yeah, a lid.

RANDY HOLLIS: Let's go to 205A which is on page 74. Number 3. I want to add a number 3. We have chemical name, purity,

concentration and supplier name and address. I would like to put under this that SDS sheets for every chemical shall be on site and--

PATRICK KERR: No, doesn't go here.

RANDY HOLLIS: And shall accompany each shipment and shall be readily available when deliveries are made. I think it's remised not requiring that. So where would it go?

PATRICK KERR: It's not there's to enforce. That's an OSHA requirement. That's not the health department.

RANDY HOLLIS: Okay.

PATRICK KERR: We could start putting all kinds of stuff in here.

RANDY HOLLIS: There is something about the requirement for SDS, but it's not during the shipment or delivery.

BEN BRIDGES: What if the product hadn't changed. The redundancy of putting it with a load of chlorine every time could be-- I mean once you have it once on site unless there's a major change to the product itself then it's got to go through all the NSF listing all that again, why don't you require every one to be-- seems like you got it on site one time should be good until it gets changed.

PATRICK KERR: Again, this is not a health department, something the health department should be. First of all it's going to apply to new facilities and for permits I don't think we need to have safety data sheets part of the health

regulation. I'm sitting here thinking about how much of a pain in the neck it is. Safety data sheets are normally kept in a central area where everyone knows where they are and basically now I have to have one with every shipping container whether it's a shipping container in storage or in transit I have to make sure the SDS is with it.

BEN BRIDGES: And updated and the correct one.

PATRICK KERR: If you have it in one place you can keep it current and people understand how to deal with an injury caused by it. But if it's in five different places it's a problem.

RANDY HOLLIS: And I understand that. Chemicals delivered in the middle of an 18 wheeler and starts leaking.

PATRICK KERR: The driver should have that and everything else.

RANDY HOLLIS: That's all I'm asking for is the driver should have that with them.

PATRICK KERR: How do I as a water company operator make sure the driver has the SDS and do I care. Once it comes on my facility.

BEN BRIDGES: If he doesn't you stop him and make him wait till he can get one sent, emailed, faxed.

RANDY HOLLIS: You know it's being delivered so before you get your forklift and offload it you say where's the SDS sheet. That's a competent operator so if we don't want to put it in there that's fine.

PATRICK KERR: We could put all kinds of stuff in here. That's

not a health department quality of water.

AMANDA LAUGHLIN: We can't enforce that like does a truck have a sheet. We actually do talk about looking for (inaudible) and NSF approvals.

BEN BRIDGES: Most deliveries we do have an SDS sheet.

PATRICK KERR: They should come with it.

BEN BRIDGES: And they should, but if they don't you go shoot the guy. What extreme do you go to. If you have an older copy in the book that would suffice and he doesn't have but one copy and you have a split delivery what do you do then.

PATRICK KERR: That's not what I'm saying. I'm saying if I have a shipping container of sodium thiosulfate if we put it here I have to keep the SDS with the shipping container.

RANDY HOLLIS: No. That wasn't what I read. That SDS should be on site and should accompany the shipment.

PATRICK KERR: Fully labeled to include C, SDS.

BEN BRIDGES: Every drum and every bucket that you have.

RANDY HOLLIS: What I said was the SDS should be on site and it should accompany the shipment. If y'all are saying we can't control that that's fine.

CHRIS RICHARD: If you get lime delivered does that section fall and so when you get a load of lime.

PATRICK KERR: There's not a bulk shipping container for lime. Well you could.

RANDY HOLLIS: Let's move on.

AMANDA LAUGHLIN: Ultimately there's permitting and there's like onsite inspection. The permitting process we're looking for specs on the chemicals for the engineer to make sure that it's NSF approved and then we double check that on the website. We look at those things in the permitting process. It's an inspection we're looking for the water system to have the chemical information. Most water systems they keep a book. It's right there and you know all their SDS sheets, all that good stuff. As far as like being able to know like what happens in the shipment we don't have the ability.

CARYN BENJAMIN: David was commenting on C. He was asking may be required by who for SA of chemicals delivered. And I had added this, the state health officer, but then I realized we don't really test the chemical. So who would test the chemical that is delivered.

BEN BRIDGES: The operator itself. When they offload they should check specific gravities color.

CHRIS RICHARD: That says required, not that he would perform it.

AMANDA LAUGHLIN: Also says may be required.

CHRIS RICHARD: It's not saying who's testing, it's just saying could require it.

BEN BRIDGES: But not every system does. Only a few of mine check it every time before it's offloaded. It's checked and I have a (inaudible) before it's ever offloaded and some don't

care. Some do and some don't. Check temperature, the whole 9 yards. And then compare it.

PATRICK KERR: It should say the state health officer may require it. That may include testing for containments in the chemicals. May require ASA of chemicals. I wouldn't say delivery.

RANDY HOLLIS: Is the word delivery correct? Or should be for chemicals utilized at the site or something. Or utilized on site.

BEN BRIDGES: If it's not delivered.

RANDY HOLLIS: The word delivered means at the time of delivery. If they come out and see 12 chemicals there. Stored at the facility.

PATRICK KERR: May require ASA of chemicals used in process. Something like that. Just period. And then you have the right to get a chemical analysis of any chemical that's being used at the facility.

RANDY HOLLIS: Go to page 76 which is 209A4.

CARYN BENJAMIN: While we're on this Kerr you reviewed this? So you're good with it. Which number?

RANDY HOLLIS: Four. This is just a general question to make sure we're comfortable. Where it says chlorine gas not stored in a room shall be. This applies to either ton cylinders or 150s, right. We're not designating it only tons. Or railroad. I didn't want somebody to say, wait a minute this

shows 150 in a room. We're passing this such this is for any chlorine gas stored. Okay.

CARYN BENJAMIN: That's repeated for ammonia as well.

RANDY HOLLIS: Wanted to make sure we're all on the same page. All right, 209E 2 page 78.

CARYN BENJAMIN: This one I wasn't sure we needed to cover this one. I didn't know if this got changed because we modified.

RANDY HOLLIS: I think it just needs a period and that needs to be taken out. That has nothing do with carrier strength.

CARYN BENJAMIN: Right. That's what I was confused about.

AMANDA LAUGHLIN: Delete the pink highlight.

RANDY HOLLIS: It has nothing to do with treated water for ammonia.

PATRICK KERR: Why does water have to be softened?

RANDY HOLLIS: Because you don't soften water carrying ammonia with scale and all of a sudden it floats up.

PATRICK KERR: I don't know how much softness we could add. It doesn't need to be softened it needs to be what.

BEN BRIDGES: Non scaling.

CHRIS RICHARD: You want soft water. You don't soften it because it is soft.

PATRICK KERR: I would say non scaling.

AMANDA LAUGHLIN: I'm just thinking about plan's review.

CHRIS RICHARD: He doesn't soften his water cause it's already soft. Softening is a process. It's saying you soften the

water. The water comes out the ground soft you don't do anything.

AMANDA LAUGHLIN: It says unless it is soft. I don't necessarily read that and think that you were intentionally softening the water. Yours is natural.

CHRIS RICHARD: I read it you treat the water to soften it. You have to treat it to soften it before you can use it as a carrier.

PATRICK KERR: I would say the carrier stream was non scaling.

AMANDA LAUGHLIN: I don't think the term non scaling to me-- that's super subjective.

RANDY HOLLIS: Unless the carrier stream must be softened.

PATRICK KERR: No.

BEN BRIDGES: What's your softener? What's your number?

PATRICK KERR: Okay so I go from 500 to 450 am I good. I'd meet this requirement. If I had a total hardness of 500 and took it to 450.

RANDY HOLLIS: Back up. This is aqueous ammonia. Why even put it in your aqueous ammonia. Anhydrous ammonia, absolutely. But when you're dealing with 81 percent water already is that necessarily required for aqueous ammonia at all. It is for anhydrous. But do we even need that for aqueous ammonia?

PATRICK KERR: What's your experience been with the new aqueous feed?

RANDY HOLLIS: We don't have a problem with it at all. When you've got 81 percent water already you don't need to soften.

When we were injecting anhydrous directly into the stream without softening it we had to clean the injectors every eight hours.

PATRICK KERR: And they're probably using DI water solution too.

RANDY HOLLIS: Maybe. I don't think we need this under aqueous ammonia at all.

PATRICK KERR: I agree.

RANDY HOLLIS: Page 91 of 109.

CARYN BENJAMIN: Hang on. I want to make sure you're good with the revision to anhydrous. Cause this was done at the last meeting. I was supposed to do it after and provide it to y'all.

PATRICK KERR: Where did the 500 gallons come from Caryn?

RANDY HOLLIS: That came from the LP Commission in federal law for anhydrous ammonia.

PATRICK KERR: Oh, I'm sorry.

RANDY HOLLIS: Anything that is more than 500 the LP Commission will not let you put it in a building. Go up to E carrier water systems. That's a good way. I'm fine with that. Page 91 section 225. T3. We go through this and say disinfection procedure chlorination method three which is highly chlorinated water held in the tank is not recommended. And then we say should be kept if it's used it's recommended. My point is if this isn't a standard and it's not recommended

should we just delete it. We have other methods of chlorination that we use.

PATRICK KERR: I don't know why it wouldn't be recommended. It should be disposed of properly regardless. It's incredibly expensive to do a tank with that method instead of just wash down.

RANDY HOLLIS: But the point is is it creates disinfection by-products. That's why they're not recommending it. Because you have highly chlorinated solution that could produce DBPs.

PATRICK KERR: Say should though.

RANDY HOLLIS: If it could create DBPs and it's not recommended why do we have it in our standard.

CHRIS RICHARD: Because T says it is. You can take it out if you want. When you incorporate C65211 you have all the standards. You'd have to say something if you don't want one.

CARYN BENJAMIN: Method three is filling it all the way up.

RANDY HOLLIS: Then Chris what I put in there where it says is not recommended what I would put is shall not be used period and then you eliminate the next two sentences.

CHRIS RICHARD: That's fine. I'm just saying you have to say something because it is incorporated.

RANDY HOLLIS: Shall not be used instead of is not recommended.

PATRICK KERR: I have to push back. The standard setting agency, this has been very highly vetted, there may be specific

circumstances where you want to use this method and the operator should be allowed to use it. If your concern is that water should not be introduced to the distribution system change the should to a shall and leave it alone.

BEN BRIDGES: What if the system doesn't have high DBP formation and can use it?

PATRICK KERR: I hate to take a method out that the standard set in committee vetted very heavily.

BEN BRIDGES: Otherwise you're wasting whatever number of gallons and that was the whole purpose of being able to dilute it down where you wouldn't waste it.

PATRICK KERR: We don't use it, probably most people don't.

CARYN BENJAMIN: Especially you don't want to send it into distribution if you're using chloramines.

BEN BRIDGES: But if you can salvage it and use it.

CARYN BENJAMIN: No, I know, but if you're on chloramines in the system and you let that water in you're going to tank your ammonia.

RANDY HOLLIS: Can we change it to this, instead of is not recommended say shall not be used unless approved by the state health officer. So then you are getting a waiver.

PATRICK KERR: No. Why do you want to take it out of the standard? What's wrong with the standard?

RANDY HOLLIS: What I hate to see is all these are shalls and recommendations from this committee and now we have something

in here that flat says is not recommended. If someone gets sick and you get into litigation and they use this method wait a minute, you guys approved this and you said is not recommended. Why did you let that water system do that.

BEN BRIDGES: Why is it not recommended, because DBP formation?

RANDY HOLLIS: That's what it says.

CHRIS RICHARD: But you don't have the potential. If you take out the not recommended it's a method that can be used. As far as introduction of the water in the system there's other disinfection requirements in the code that require the chlorine or the disinfectant to be at a certain level. There's other places that cover it.

BEN BRIDGES: Caps it where you can't be over 4.

RANDY HOLLIS: Say that again.

CHRIS RICHARD: There's other parts in the code that cover the disinfectant levels that can be introduced in the system.

AMANDA LAUGHLIN: I understand why it would not be recommended in certain circumstances, but I don't like dealing portions of the standard. I think that is very difficult and confusing. You're going to have all sections of a standard approved except for one, but it's an AWWA standard.

RANDY HOLLIS: You're saying we should leave it in like it is or take it out totally?

AMANDA LAUGHLIN: If the procedure's used it's recommended that you dispose of it and not necessarily put it into the system

like that. I don't know that when someone uses that method my first thought is that they are going to waste it somewhere, flush it before putting it to the system.

RANDY HOLLIS: This procedure is you fill up a tank 5 percent with like, what was it 200 PPM or something to 5 percent. So that water that's in there could create DBPs. Then you fill it up totally and if it passes you put it into the system.

BEN BRIDGES: But you've also reduced the percentage of DBPs in that volume. You have diluted it because you added water that's still convoluted.

(council speaking simultaneously)

RANDY HOLLIS: The advantage to this is all the water used in the disinfection tank you don't waste. It goes into the system.

BEN BRIDGES: If it's 30,000 gallons that's one thing, but if it's 2 or 3 million.

AMANDA LAUGHLIN: A 2 or 3 million gallon tank you're probably not going to go that route. You see what I'm saying. It's kind of like we're trying to make something apply to all. They have different options and I think that an engineer they wouldn't use that method in instances where that's not the best method to use. They have other ways to do it. You're basically stating no one can do this at any point at any time.

BEN BRIDGES: I hate to say that.

AMANDA LAUGHLIN: That's why I don't like piece mealing

portions of a standard.

BEN BRIDGES: It may not be the most economical, but it might be the easiest way to do it.

RANDY HOLLIS: And a lot of maintenance companies use this method because they can take HDH and dump it in the bottom of the tank, fill it up a little bit and then let it sit there for whatever contact time is required. And then they fill it up the rest of the way. And then they put the tank in service. Who's going to take a THM sample?

BEN BRIDGES: Nobody.

PATRICK KERR: And there's no need to. THM is not an acute problem. It's a chronic problem. That's why we use a 12 month average. But I think we're over analyzing this and lots of systems-- method three is 5 percent at 50 milligrams per liter and then fill the tank. So 95 percent has system water and 5 percent had 50 milligrams per liter. The only thing we have to do I would imagine a lot of systems actually use this process. We use a wash down process, we wash the walls down. But then this has to be held for 24 hours after it's filled and sampled. I think this is a perfectly acceptable method.

RANDY HOLLIS: But somebody other than me thought about the DBP problems because that's listed in there.

PATRICK KERR: Somebody did. Whoever worked on this section. They were concerned about DBPs and we want to point it out to people it may cause a problem.

BEN BRIDGES: Here is the one big negative. You could blow a DBP.

PATRICK KERR: If you read this it's very reasonable method for disinfection.

RANDY HOLLIS: Absolutely. We used to use it all the time. And the state says you can't use it anymore.

PATRICK KERR: Which one?

RANDY HOLLIS: This one. They only allow method two. They don't approve method three.

CHRIS RICHARD: We're writing the code right now and we're saying three is okay.

AMANDA LAUGHLIN: What?

RANDY HOLLIS: The only method we've had approved lately is two.

KEITH SHACKELFORD: Last time I did a tank it was the same way.

PATRICK KERR: Fifty milligrams in the first 5 percent of the tank.

AMANDA LAUGHLIN: It might be because there's a conflict in the sanitary code.

RANDY HOLLIS: I'm not dreaming this up.

AMANDA LAUGHLIN: I understand. But in our sanitary code we have a disinfection method too. And so we've kind of gone outside of that and allowed AWWA standard in lieu of what's in the sanitary code. I don't know that it's necessarily the method is changed.

BEN BRIDGES: I know of a system they just did three. Fill it

up and didn't waste it.

PATRICK KERR: And then they sampled it for bac-t and put it in service.

AMANDA LAUGHLIN: Before I don't think, and Caryn you might correct me if I'm wrong, (inaudible) AWWA standard in our code at all. We were allowing it as an equivalent so you can use the code or AWWA standard. I think the standard has changed over the years.

BEN BRIDGES: I think the main fix is going to be on the bac-t side. I wouldn't worry about THMs at this point.

CHRIS RICHARD: You can take that whole paragraph three out.

RANDY HOLLIS: If we want to leave something that says not recommended that's okay. It just seemed odd.

PATRICK KERR: If you're worried about litigation why are we putting it in there?

RANDY HOLLIS: That's my point.

PATRICK KERR: Just take it out. Just take the paragraph out.

CHRIS RICHARD: Not take the method out, take paragraph three out.

RANDY HOLLIS: That's fine.

PATRICK KERR: Who put it in there, the subcommittee?

RANDY HOLLIS: It's an AWWA standard.

AMANDA LAUGHLIN: What chapter was that in? When it was under review. What committee?

CARYN BENJAMIN: What was the duration for that one? Might

have been because of the duration or the residual because you have to have that residual of 5.

RANDY HOLLIS: Large storage tanks may be disinfected by washing the interior of the chlorine at 2 milligrams per liter.

CHRIS RICHARD: So you can do that or the one before it. You can do them both.

RANDY HOLLIS: That's what we used. Go down to the bottom of the page. That's A. B is the one says you may use the other method. So what do we want to do, take it out?

PATRICK KERR: Leave it out.

RANDY HOLLIS: Page 92 of 102.

PATRICK KERR: AWWA standard 50 parts 5 percent for 6 hours filled overflow 24. Sample twice.

CARYN BENJAMIN: What about residual?

PATRICK KERR: Two.

RANDY HOLLIS: Are we all in agreement with this? Okay, 229 C1. This talks about the sizing of pumps and wells in a hydro tank system. This comes straight from 10 state standards. Says the capacity of the well in the pumps in the hydro system should be at least 10 times the average daily consumption rate. And then it talks about the size of the hydro tank should be 10 times the pump. I'm okay with that. The pump and the tank. It's just if I have a well I'm saying if the demand in the system is 50 gallons a minute I have to have 500 gallon a minute a well. And that seems to be overkill to have 500 gallon a minute

well and you only have 50 gallons a minute demand in the system. My question is should we lower that number 1 from 10, I'm not comfortable going down to 2 or 3, but maybe 5 is a reasonable number.

CHRIS RICHARD: I think 5 is a good, probably the highest peak factor you would have on a water system anyway. I think 5 is a good number.

RANDY HOLLIS: I just think 10 is overkill. For smaller systems. And you can't use a hydro tank for greater than whatever we stipulated in here, 150 customers or something.

CARYN BENJAMIN: We're talking about the capacity of the well and the pump. Shouldn't that be listed in the well section?

RANDY HOLLIS: This is talking about tank systems.

CARYN BENJAMIN: They may not realize it until they get to the tank and they've already designed.

CHRIS RICHARD: You could have a system that doesn't have a hydronumatic tank because it's not pumping into it the well could be much smaller because you have storage.

PATRICK KERR: Let me ask a stupid question. Doesn't that say it needs to be 5 times the average daily consumption. So 5 times not 50 gallons per minute, but 5 times 1,440 times that or 74,000 gallons. The average daily consumption rate is how much water you use in a day.

CHRIS RICHARD: It's a rate so it could be GPM.

PATRICK KERR: Gallons per day. Daily consumption. Doesn't

say per minute.

CHRIS RICHARD: It's a consumption of rate so since it's a rate it can be expressed in GPM.

PATRICK KERR: But it says daily consumption rate. You're saying daily consumption rate in gallons per minute?

CHRIS RICHARD: Yeah, I'm saying that's how I interpret it cause I think that way.

RANDY HOLLIS: Let's say the average daily flow rate in the system is 50 gallons a minute. That means you have to have 500 gallon a minute well.

CHRIS RICHARD: Change it to average daily demand. We don't use consumptive anywhere else, I don't think. Take that out and put demand.

RANDY HOLLIS: Well technically average daily demand of max day of the max month.

CHRIS RICHARD: They have average day as well in the code and take the rate off.

PATRICK KERR: But it can't be the daily demand expressed in gallons per minute. How do you want it? The daily demand is 70,000 gallons a minute.

CHRIS RICHARD: But you can do the same thing with the well. The well is 50 gallons a minute operating 24 hours a day. It's a rate. Express it either way. You have to express them the same.

RANDY HOLLIS: It could say average daily demand expressed in

gallons per minute. Then we have a 250 gallon a minute well on the average daily demand is only 50. We're still 5 times greater.

KEITH SHACKELFORD: And you got a second source.

PATRICK KERR: You're going to change that in the next paragraph too.

RANDY HOLLIS: No, I think the tank needs to be 10 times the pump for cycling. That's proper. I just thought the well was overkill.

CARYN BENJAMIN: Shall or leave it as a should?

KEITH SHACKELFORD: I would say should and make it as a minimum.

RANDY HOLLIS: Says should be at least. Shall be at least.

PATRICK KERR: What about paragraph 2?

RANDY HOLLIS: Yep. Right after 250 GPM pump shall.

CHRIS RICHARD: Then you have to say a minimum. It's at least 10 times so that's a minimum. 250 GPM is not shall be 2,500 gallons. That's the minimum. It could be 5,000.

RANDY HOLLIS: Section 231. I guess this goes to 231 page 93 this talks about pressures and we're going up to 20. I guess this is for all new systems right here, but we did stipulate one of the deficiencies we're going to make every existing system go to 20 instead of 15. This is for future so I'm okay with all future ones being 20. Should we go back and revisit that for the smaller systems. Y'all okay going to 20 for everything.

CARYN BENJAMIN: We'll have another meeting to go over that rule.

AMANDA LAUGHLIN: Last meeting it was going to be significant deficiency going forward. I will say this, in plans review a lot of times if you've worked in an area for a long time you know what water systems have pressure issues. I know for myself when I would review plans and I saw a project come in and I knew they already had pressure issues and now they're extending their line further that raised a lot of questions. Don't do this cause you're not going to be able to meet it. I think that's something our engineers will as they learn water systems and all the things that go with it I think they will catch that in plan review. Extending lines and not going to meet 20 out there.

RANDY HOLLIS: We talked last time the last meeting was we're going to make every existing system comply with 20. And so the question is if they come in for a simple line extension to serve four houses wouldn't that be the time to say okay guys no, not until you prove to me that you could meet 20 everywhere. Are we going to retroactively go back on every little system and say guys as of July next year 15 no longer counts. You have to meet 20 whether you have a line extension or not for any permit. Is the time to do that really when they come in for any permit whatsoever?

AMANDA LAUGHLIN: No. Once it's a significant deficiency it's

every one all the time. This would be more about the design of the system and can you meet the 20 going forward with what you have. The significant deficiency will catch people that are already existing systems that aren't meeting the 20. So either way.

PATRICK KERR: Are there any systems in Louisiana that have more than 100 pounds static pressure?

CARYN BENJAMIN: Some of the plants.

PATRICK KERR: I guess my question is that last sentence makes it the water company's responsibility.

CHRIS RICHARD: You can get it at the bottom of the hill like in North Louisiana you get high pressure.

PATRICK KERR: But is it the water system's responsibility to install pressure reducing valves or the customers?

CHRIS RICHARD: The water system. We put it in cause it will break the lines.

BEN BRIDGES: The customer was responsible with this one.

PATRICK KERR: And this makes it the water company's responsibility. I'm just curious is that really what we want to do. Some water systems will want the customer to maintain the pressure reducing valve on their pluming system. And other water systems will install them themselves. Same argument about back flow prevention. This says it has to be a part of the meter setting or at the main. I don't know that's what we want to say.

RANDY HOLLIS: Every system I've ever dealt with that had over 100 it was the water system's responsibility at the meter to knock it down and put a pressure reducing valve.

PATRICK KERR: I know lots of systems in North Carolina the meter's at the street and the pressure reducing valve is in the basement and it's owned by the customer and maintained by the customer. Personally I don't care, but does anyone want to make this a water utility responsibility. That does, that makes it a water utility responsibility.

RANDY HOLLIS: I think the problem you run into is hot water heaters and pop off valves. And now you get a customer whose pop off valve is going off is that because of a hot water heater or the water company is sending the water pressure too high.

BEN BRIDGES: You have systems we're fixing to get in this in one area in particular cause we're fixing to consume about 30 houses that are on 40PSI water and when you hit it with 80, 90, 100 the valves are not ready for it. So what we've done in the other cases the one or two houses that really had problems we put a pressure reducing valve on the customer's meter itself. He paid for it.

PATRICK KERR: Can I make a suggestion that we fix this by saying the static pressure exceed 100 PSI gauge pressure reducing devices shall be provided on mains comma as part of the meter setting on individual service lines comma or be required of the customer.

BEN BRIDGES: I don't like it on mains.

PATRICK KERR: I don't either, but it's an option.

BEN BRIDGES: If I'm down from you and I want 80 PSI at my house and you only want 60 and they regulate me to 60 I'm not going to be happy.

PATRICK KERR: I agree.

BEN BRIDGES: It needs to be meter or unit.

CHRIS RICHARD: They have some systems they have main breaks so they want it on the main.

PATRICK KERR: And that's okay. We all choose what pressures we operate under.

CHRIS RICHARD: I'm saying don't take off mains. If you want to add to it. If you leave all three then it's an option.

BEN BRIDGES: I just don't want it to be limited to the main. If I build a new camp house and I want and I can handle 80PSI I should be able to.

CHRIS RICHARD: Pat said you can do anything you want.

PATRICK KERR: The utility can do anything it wants. The customers can complain and get it changed.

BEN BRIDGES: I like the point of use more than the whole main.

RANDY HOLLIS: I hate the word shall on the main because that says you shall be provided on the main.

AMANDA LAUGHLIN: More about where the responsibility lies.

RANDY HOLLIS: We have some mains in Tennessee leaving out of there 200 PSI. As long as it's part of the meter and not the

main I'm okay.

PATRICK KERR: Or required of the customer. If we could add something.

CHRIS RICHARD: Shall be provided on mains, or as part of the meter setting, or required on whatever you said customer.

PATRICK KERR: Or installed and maintained by the customer.

CHRIS RICHARD: Either one of the three.

PATRICK KERR: Baton Rouge Water couldn't care less, but there may be some systems in North Louisiana where the customers are responsible for the pressure reduction.

BEN BRIDGES: They're so few and isolated we've just told the customer put one in and they did. And it's 100 bucks and they were all happy.

PATRICK KERR: You couldn't do it with this written as is.

BEN BRIDGES: I just had an engineer last week ask me do I want to do a whole new 4 inch main for 30 houses or individual. I said individual because I may want more pressure at my house.

PATRICK KERR: We have agreement, right. We're all saying the same thing.

RANDY HOLLIS: Should we take out the word static though. What if your well kicks on?

PATRICK KERR: We have all kinds of transients 10 times 100 pounds as you well know.

RANDY HOLLIS: Not 10 times 100 pounds. But 125 130 easily.

PATRICK KERR: You don't think pressure transients can hit 6

700 pounds in a 100 pound system.

RANDY HOLLIS: They can but.

PATRICK KERR: I think static is a good word there.

RANDY HOLLIS: Add on that you want to add on the end of that.

PATRICK KERR: I would just say provided on the mains comma take out the or shall be provided on mains comma. Take out the or. And then after system put comma or.

JIMMY HAGAN: Is it just a question of who's going to provide it?

PATRICK KERR: Yeah.

BEN BRIDGES: Customer or the system.

PATRICK KERR: Or a condition of service on the customer. I don't know.

JIMMY HAGAN: The system installed it because the system was building a system that had such high pressures in some areas to meet the 15 or 20 out on the end.

PATRICK KERR: And you maintain them at every customer's house forever?

JIMMY HAGAN: The system does, yes.

PATRICK KERR: They do? Wow.

JIMMY HAGAN: Because those guys are closest to the source.

RANDY HOLLIS: I really consider the pressure reducing valve just like the meter. The system owns it, the system should own the pressure reducing valve and maintain it.

PATRICK KERR: Okay, I'll be quiet. Leave it alone. That's

fine.

RANDY HOLLIS: I think blaming the customer because pressure blew up something in their house I don't think that's right. I think the system should regulate that pressure to a reasonable range to the customer's house.

PATRICK KERR: So I should be required to maintain pressures when your water heater has a problem?

RANDY HOLLIS: You have to maintain minimum 20PSI to that customer. That's law.

PATRICK KERR: When their water heat backs up the system because there's a backflow preventer and they start blowing plumbing is that my problem or there's?

RANDY HOLLIS: I just think we should be responsible for not blowing out their piping.

BEN BRIDGES: If you're sending them 120PSI at the bottom of a hill they can't do anything about that.

PATRICK KERR: Other than put a pressure reducing valve.

BEN BRIDGES: Right, but it's not their fault you're sending them so much pressure. Maybe the system could absorb. And we're talking about isolated cases, not 30,000 customers.

PATRICK KERR: It's not a problem for me. I think there's some systems in North Louisiana.

RANDY HOLLIS: If somebody comes to you and says I want a line extension and by the way I'm 200 feet down the hill. And he said well you're the only one in our system. Okay, I can give

it to you, but it's going to require a special feature. Then you can require the customer.

BEN BRIDGES: And we would charge for that and put it in the main up top. But if it goes through four bottoms and only one guy complains we're going to put it on that one guy.

RANDY HOLLIS: The last thing I have was 235 and I think Amanda clarified that for me. I was surprised to see this under materials. It talks about shall not contain more than .2 percent lead. Thought it was .25. I didn't realize there were exceptions to that and they straightened me out and said yes there are, that distribution main (inaudible) valves 2 inches in diameter or larger are exempt from the lead free requirement.

PATRICK KERR: So are fire hydrants.

RANDY HOLLIS: Yeah. I was just surprised to see there was no requirement on lead for systems. That's all I have.

PATRICK KERR: I have a question that someone raised yesterday. I recommend a bunch of IEs get changed to EG in the code and Caryn did that. But where it talks about permits not required for in kind replacements where the code now requires a minimum of 3 inch lines in a distribution system and we're replacing 2 2 1/4 inch galvanized. Can we make a 3 inch line an in kind replacement and not require a permit?

AMANDA LAUGHLIN: Typically water lines are not in kind. You have to check the material, disinfection method.

PATRICK KERR: If I replace a 8 inch waterline and don't make hydraulic changes I don't get a permit today. If I have an 8 inch AC pipe that I need to replace because it's leaking too many places and I replace a thousand feet of it there's no permit required for that. We can argue about whether I should apply for a permit or not. It's an in kind replacement. We're not required to, right. That's an in kind replacement.

CHRIS RICHARD: I always thought of that more on the plan end myself. Equipment type things, pumps, clarifier equipment, in kind.

AMANDA LAUGHLIN: I've never considered a pipe replacement in kind. But pumping and those types.

PATRICK KERR: We always have.

AMANDA LAUGHLIN: Pipes, no.

CHRIS RICHARD: I think part of the issue with it on the water pipe the reason it's different on a lot of systems is they have to get bac-t from the health department.

AMANDA LAUGHLIN: How far are you going to be from the sewer system.

PATRICK KERR: I guess I'm opening up a can of worms, but the code does not require it. Let's go back to what's required for permits.

CARYN BENJAMIN: You didn't change the size, you didn't change the material.

CHRIS RICHARD: He's changing the material. That's why you

need a permit.

PATRICK KERR: It's not a hydraulic change.

BEN BRIDGES: Something that doesn't leak. A better product.

AMANDA LAUGHLIN: Galvanized to PVC? Yes, we would review that.

CHRIS RICHARD: Because you're changing material.

PATRICK KERR: So then you're changing manufacturers of pumps you need to get a permit?

CHRIS RICHARD: If I'm changing capacity, not the manufacturer. PVC and galvanized isn't the same as going to Goulds to Fairbanks Morse. Going from galvanized to PVC that's two totally different materials. And the material has to meet certain specs. We've always submitted plans for line replacements.

PATRICK KERR: We don't.

BEN BRIDGES: What length, under 200 feet? Any length.

PATRICK KERR: Look what it says, shall be constructed, operated, or modified to the extent that capacity hydraulic conditions functioning of treatment process or quality of finished water is affected without getting a permit. Change from galvanized to PVC doesn't change any of that. I'm not required to have a permit. It doesn't change the treatment process, the quality of finished water, capacity of hydraulic conditions.

JIMMY HAGAN: If you go from a 2 to a 3 it does. And it also

changes the quality. It's going to be a lot better.

PATRICK KERR: If I replace an 8 inch PVC line with an 8 inch PVC line I don't get a permit. There's no need to have a permit. We do it all the time.

CHRIS RICHARD: I've changed galvanized or old cast iron lines to PVC and I submit a permit. I'm not saying I was right or wrong. I'm telling you what I did.

PATRICK KERR: The code does not require it. I'm glad you guys do. And all I was asking is since I now have a minimum size requirement for distribution lines of 3 inch I was asking if we could make in kind to say anything smaller than 3 move to 3 is in kind.

CHRIS RICHARD: Another reason I think they required it in the past is you can't put it back where it was typically.

PATRICK KERR: That doesn't matter.

CHRIS RICHARD: No, it does matter. Because there's clearances from sanitary structures.

PATRICK KERR: It didn't change anything that requires a permit.

CHRIS RICHARD: But it's a sanitary feature.

PATRICK KERR: It doesn't matter. Chris it doesn't require it. It's not required.

CARYN BENJAMIN: Let's put in material.

AMANDA LAUGHLIN: I respect that's your interpretation; that's not mine. It does require a permit.

CHRIS RICHARD: But what you're saying I can go put a new waterline in--

PATRICK KERR: Read what it says.

CHRIS RICHARD: I understand what you're saying.

PATRICK KERR: No, I'm not saying that.

CHRIS RICHARD: You can because--

PATRICK KERR: No, I can't. Actually if I had one right next to a sewer line I could replace it in place without getting a permit. And I can repair it in place without getting a permit. The way it's written. It would be kind of stupid to do it. But yes, I could. Anyway, sorry. I opened that can of worms. I'll be quiet. Do we need to change that?

AMANDA LAUGHLIN: I don't think there's anything that needs to be changed about it.

CARYN BENJAMIN: Want me to add material?

PATRICK KERR: We're going to vote on it.

CHRIS RICHARD: I wouldn't add anything.

PATRICK KERR: So you change a Gould's pump you're going to have different pump curve, it's going to change hydraulic conditions. You need a permit. Why?

CHRIS RICHARD: It's not changing quality of the water.

PATRICK KERR: Change the hydraulic conditions.

JIMMY HAGAN: If you change the size of the pump.

CHRIS RICHARD: Not changing the size. He's saying I can't get the exact same one. Unless you change the exact curve.

PATRICK KERR: That's a hydraulic change. We never interpreted it that way.

CHRIS RICHARD: The design point is the same.

BEN BRIDGES: Is there a distance, a minimum that you can change out. So if you have a leak and you change out 5 foot.

AMANDA LAUGHLIN: That's different.

CARYN BENJAMIN: Maintenance, repair.

PATRICK KERR: That's a modification.

BEN BRIDGES: What's the difference in repairing or replacing.

PATRICK KERR: I guess we've always interpreted it to say if we're not modifying the hydraulic conditions, the treatment process, the capacity we don't need a permit cause that's what it says. That's how we've always dealt with it. We can modify it, that's no problem.

JIMMY HAGAN: Y'all view 2 1/4 to 3 as a repair.

PATRICK KERR: No, I'm asking if we could make that an in kind replacement. In kind is used someplace else in the language that Caryn put together.

AMANDA LAUGHLIN: I would consider a repair doesn't require a permit.

CHRIS RICHARD: I'm saying if you had to replace a section of pipe I don't know what the length would be. If you wanted to put, you could put the 3 inch minimum requirement would not come into play.

PATRICK KERR: We don't normally get a permit to replace a piece

of 2 inch galvanized with a piece of 2 inch PVC whether it's 10 feet long or 100 feet long. We never thought we needed a permit for that. Maintenance, replacement existing facilities in kind shall not be required.

BEN BRIDGES: But you're not in kind. You went from 2 to 3. That's what I missed while a go. I was going to 2 to 2 or 3 to 3.

PATRICK KERR: No, what I said is I would like us to define in kind to include a change from something that's no longer allowed, 2 inch line to 3 inch line, define that as in kind. This right here says replacement of existing facility permits shall not be required.

CHRIS RICHARD: I think the 3 inch minimum doesn't apply to you going fix a 2 inch line.

PATRICK KERR: The reason to have the 3 inch minimum is real. I would like to be able to upgrade to the 3 inch as we do it without getting a permit. This is the other place I rely on to tell you I don't need a permit to do replacement of existing facilities. So 8 inch AC to 8 inch PVC an existing facility, in kind.

BEN BRIDGES: But 2 to 3 would not be.

PATRICK KERR: But 2 to 3 wouldn't so what I was asking is if I'm upsizing specifically to meet the code requirement of 3 inch can we call that in kind.

AMANDA LAUGHLIN: I'm sorry, I have to leave. I have a 4:00

call. Is this the last comment ever.

PATRICK KERR: We can leave it. We'll just get a permit. The only two things I did is the requirement for phosphate testing you said had to have a range of .2 to 20 milligrams per liter. I suggested many of our kits don't go that high. If we did .2 to 1.2 times your target you would know if you're over. So if I had a target of 5 and my kit only test to 5 we're going to be rock solid at 5 if I overdose.

AMANDA LAUGHLIN: Where does that come from?

PATRICK KERR: I don't know where it came from.

AMANDA LAUGHLIN: Is that a 10 state standard language?

CARYN BENJAMIN: This was.

AMANDA LAUGHLIN: Phosphate measuring kits, I'm not sure what their range is.

BEN BRIDGES: You would have to have two or three different sets and possibly two machines to run.

PATRICK KERR: Exactly. So I'm just trying to get away from that and just say you need to be able to test the range of dose you're going to use. And a little more so you can see if you're over. That was my only recommendation.

CARYN BENJAMIN: Was there one more?

PATRICK KERR: I don't remember.

AMANDA LAUGHLIN: So September 11th 2 to 4. Next meeting Caryn or I will send out a meeting invite.

PATRICK KERR: Oh, that was an important one. Ten days of

chlorine storage at each site is a huge issue for a lot of systems. The threshold quantity for chlorine is 2500 pounds and I would like to have a provision that says you can have 10 days of storage or have a plan for getting it delivered. You got to have an adequate plan to get the chlorine you need. So 10 days of storage at one of our facilities would be 15 tons of chlorine. We use a ton and a half a day. That's too much to ask us to store.

AMANDA LAUGHLIN: I remember this conversation and we debated this for like two hours about how many days of chemical supply needs to be onsite and I don't remember, it used to be a lot more, wasn't it like 30 days and then we went to 10.

PATRICK KERR: I'm just talking about the highly hazardous chemicals. EPA has established a threshold quantity for. So Baton Rouge Water Company probably would need to store in the aggregate... And we're not building new facilities I guess. What I'd like is a way to have a plan that you guys can approve. I don't care how you word it.

AMANDA LAUGHLIN: What do you have onsite at each site now?

PATRICK KERR: Our sites vary, but at our largest site we're about to put in a 25 ton storage facility. But we're planning to use that at all of our sites and move it around.

AMANDA LAUGHLIN: That meets the ten days.

PATRICK KERR: For that one site. I have 60 sites. Many of the sites have three or four days. Some have 30. Our control

is 2500 pounds. So if I'm using more than 250 pounds a day I cannot store 10 days on that site without doing a risk management plan which is a very involved process.

AMANDA LAUGHLIN: That's for new. If you built a new site you would probably plan for 10 days. You're already doing that. You just said you have 25 tons.

PATRICK KERR: We're going to put a major storage facility so we can service our own. I just think you're asking to put a highly hazardous chemical in the community for no good reason.

AMANDA LAUGHLIN: I understand, I just have a hard time going back and changing something we debated and debated and voted on. We will have to go over it all over again.

PATRICK KERR: I don't remember that debate.

AMANDA LAUGHLIN: I remember it was 30 and everyone agreed on 10.

PATRICK KERR: Ten state standards says 30 for all chemicals?

AMANDA LAUGHLIN: Yes.

KEITH SHACKELFORD: We often wind up more than that because you want 125, 130 percent of the delivery.

PATRICK KERR: That's bulk chemicals. Chlorine doesn't get delivered that way. There's a lot of guys run 150 pound bottles of chlorine that are changing them once a week. Or every couple days. If you're changing them every couple days then you need to have minimum of 5 150s onsite. I think the greater good is served by reducing that exposure.

RANDY HOLLIS: Storage should be provided for at least 30 days chemical supply.

PATRICK KERR: At each facility.

RANDY HOLLIS: It was a minimum 1 1/2 truckloads.

PATRICK KERR: This is a shall guys.

AMANDA LAUGHLIN: I would have to read what a threshold quantity risk management plan entails.

PATRICK KERR: So highly hazardous chemicals, tier two chemicals normally have a quantity above what (inaudible). So for chlorine it happens to be 2500 pounds. If I store more than 2500 pounds of chlorine at any site I have to have a risk management plan which includes an analysis of all the downwind impacts of a release. It's huge. DEQ gets involved, EPA gets involved. We have RFPs at some of our facilities. I'm just looking for a trigger. If you want to keep ten days of phosphate onsite I've got no problem with that. It's something that's inherently safe.

RANDY HOLLIS: Let me ask this question. This is for the design of facilities. So you design it to handle a minimum of ten days. But if the operator on duty decides to only want two can you be cited that he doesn't have ten days of storage onsite?

CHRIS RICHARD: Have to maintain it in a way it was permitted, so I guess he could be.

PATRICK KERR: It says a minimum of ten days shall be onsite.

Not available, onsite.

BEN BRIDGES: So he would be in violation.

RANDY HOLLIS: Onsite or readily accessible.

PATRICK KERR: The world is not going to end if we stop chlorinating in an emergency. We'll be under a boil notice.

RANDY HOLLIS: That's your proposed language?

PATRICK KERR: That's my proposed language. We'll vote on it next time.

AMANDA LAUGHLIN: We are really-- we have to go to rule making or this is never going to happen.

BEN BRIDGES: We were ready today.

AMANDA LAUGHLIN: It's four and we just now finished comments, additional comments and additional comments.

CARYN BENJAMIN: Next time I send this out it's going to look a tad bit different. I'm going to accept all the changes and then I have to take the new sections and they're all going to be turned into red text.

RANDY HOLLIS: Are we adjourned of the non meeting?

CARYN BENJAMIN: Yep.