Water Meeting

11/24/14

J.T. LANE: Good morning everybody. Thank you to all that could make it. Roll call please.

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

J.T. LANE: Good morning again. The only statement I was going to make the new format of the meeting, the length of the meeting, really this is our first long meeting if we get through either this morning or this afternoon if we need a break just somebody raise their hand, take a 10 minute break if we need to just to respond to emails and what not. With that number 3, approval of the minutes. I think everybody got that via email last week.

SHEREE TAILLON: This is actually September's minutes we are approving.

J.T. LANE: Any questions about them? Any objections? Jake, update on the amoeba.

JAKE CAUSEY: We have I guess concluded our surveillance program during this summer. I think our last round of sampling was the last week of October. Actually haven't gotten those results back yet. I guess we're not certain what those might be. Other than that we did a total of 28 water systems. Roughly five samples in each of those sites. We'll be working, once we get these final results back, working to write a report on all of the findings, etcetera so that we can share. But certainly a lot of samples come back with thermophilic amoebas in general present. I guess a descent number of those came back with positives with the distribution system, but not all of

those positive for naegleria fowleri specifically. We're trying to summarize those data and certainly make that available to share with everyone. One thing we definitely, I guess so initially the survey kind of started with systems similar to St. Bernard and Desoto as far as surface water chloramines, residuals, and we knew we had a limited timeframe with the number of samples. Trying to get groundwater, a few free chlorine systems. It was kind of a hodgepodge of at least some of those different elements that we wanted in there. For next summer we want to look at doing a broader groundwater survey like raw groundwater to get an idea. If we find this amoeba like they found in Arizona for sure. I know some of them speculated whether it was in their (inaudible) or perhaps just affixed to well casings. They really didn't include one way or the other. But anyway, if that's there and positive and present in any of our water wells we certainly need to know about that. I guess that's where we were at. Getting the last round of results I guess hopefully this week and then we'll certainly be preparing a final report to share with everyone. It is over. That's all I have.

J.T. LANE: Any questions? With that up for new business number 5.

SHEREE TAILLON: Greg said he was going to be here.

J.T. LANE: With that we'll move on to old business.

PATRICK KERR: The interstate is closed on one side or the other in Baton Rouge. I don't know which one.

J.T. LANE: With that you have copies of part 7. With that I think what we'll do is start with part 7 and see if there's any questions on the copy that has changes from our last discussion. Open it up now for any discussion or questions. Any adjustments we might need to make for the copy before we move for final approval? Any questions or comments?

DIRK BARRIOS: I still think we shouldn't be placing a requirement of 100 year flood elevation that should be maybe should or possibly adhere to the local building requirements. In the lower part of the state 100 year flood elevation to do any kind of design you're looking at storm surge. Part 7.0.2 part A. Storm surge is a very important impact on especially the lower coastal areas and anybody that lives in the coastal areas is going to have problems. Don't put any requirement, just say have to adhere to the local building requirements. Why should we as a board on water quality standards be worried about the elevation? They have to meet the requirements of the elevation wherever they are building at. Why should DHH first thing I'm going to ask is well what is the elevation of the 100 year flood at that location? I don't think that's something DHH should have to worry about.

JAKE CAUSEY: I didn't catch the last part. What specifically?

DIRK BARRIOS: What I'm saying 100 year flood elevation requirement for building is an issue that should be of local concern. You have to meet the building requirement of wherever you are building at. Why should DHH, this is water quality standard, nothing to do with elevation.

JAKE CAUSEY: I would say water quality has a lot to do with elevation.

DIRK BARRIOS: When you are putting 100 year flood elevation basically saying lower parts of the state are going to have issues. Y'all seem to not understand that 100 year flood elevation encompasses storm surge and a storm surge in a lower part of the state, and I talked to engineers that deal with it every day and they told me storm surge is what you have to take into consideration. Building up plus 18, plus 14, plus 12, whatever. Let's face it, on the coast we don't have a rocky coast. We have a spongy coast and it's not going to be something that we would be able to adhere.

JAKE CAUSEY: Building codes are based off of 100 year flood elevation.

DIRK BARRIOS: You have no flexibility in here when you are saying a 100 year flood elevation. Probably going to pass, but I'm going to vote no. Anytime you are going to say 100 year flood elevation I will vote no. I surveyed for 20 something years; I know what it means. Not in favor. I thought we were here to set standards on water quality and all of a sudden setting standards on a whole lot of stuff that has nothing to do with water quality issues. We all have to adhere to building requirements. I don't think water issues should have anything to do with that. You can refer to the local building requirement or something like that or should or whatever, but I just don't think that statement in here. When you say a 100 year flood elevation in 10 states that are in the Great Lakes area they are talking about most of the time. If it was strictly a rain event most people wouldn't have an issue, but when you live on the coast you have to consider storm surge. And storm surge is something that you can hardly ever, you can design for it, but the next storm might be worse. I just think it's an issue that we shouldn't be placing these precise requirements.

CHRIS RICHARD: I understand what Dirk is getting at. I understand what your position is Jake as well as protecting the inundation of the ground storage tank in other parts of the state. There are requirements in the state that differentiate between whether you're a coastal parish or not. I don't know if there's something that you could say that I understand you don't want to put a ground storage tank 20 feet in the air because of storm surge. It's not going to be effective and you're not going to be serving water to people who have already evacuated. Could you put the 100 year requirement except in coastal parishes which would be handled on a case by case basis, or good engineering practice, or something? I understand you can't put it to protect above a 20 foot storm surge along the coast when the elevations are zero to one.

PATRICK KERR: I wonder Jake if we couldn't put just after groundwater table comma and then say something unless the facility is protected from inundation to a 100 year flood elevation. We could design a tank that you could in fact have 3 feet, 4 feet of water on the side wall and not have a problem with finished water storage. But reliability of the system is really important to water quality. If you need the tank to provide water service and you should be able to function even if there's a 100 year flood event. Would that satisfy you if we put something, I don't know exactly the language, inundation is accounted for in the engineering design?

CHRIS RICHARD: A lot of the parishes don't have protection, the levy system for a storm surge. It wouldn't satisfy some of those low lying coastal areas.

PATRICK KERR: Penetration to the side wall will be above the 100 year flood elevation. It's impervious to water flowing through the side wall obviously in a foundation, vents and things. Opens above that should satisfy I would think.

J.T. LANE: Something we come up with now or do y'all need to...

PATRICK KERR: I think if you just said unless inundation up to the 100 year floodplain. Provisions are made for inundation up the 100 year floodplain.

RICK NOWLIN: Being from North Louisiana let me ask the question please, when you have a major storm surge is the plant shut down in South Louisiana? Is it standard practice to shut the plant down or keep the plant running until it's inundated then you shut it down? It seems to me that if you make a change that you're talking about you might be building a lot deeper reservoir than you otherwise would build. Is that true or not? If you are saying no penetration below the 100 year flood elevation that don't point less than the 100 year flood elevation.

DIRK BARRIOS: It's still going to cause you issue I'm sure from your design. A ground storage tank you don't normally, let's say it's 54 foot high, you don't normally enter a

ground storage tank 54 foot high off the ground. Bunch of engineers in here. They are all water tight, the tank can't leak.

PATRICK KERR: Talking about vents too. If you put a 10 foot tall that's partially underground right now what it says is 50 percent of the stored water has to be above grade. If you were to put, we have a storage tank in Baton Rouge that's open at the top of it and it's probably 15 feet tall, maybe 18 feet tall, those need to be above the flood elevation. It's protecting against inundation. And your sump would be below grade most likely, but it's protected from inundation. I'm not talking about, I'm just saying any atmospheric vents will be above the inundation level period.

RANDY HOLLIS: I think the perfect example of that the tanks, the crom tanks where you have the manways that are located at ground level, but those are water tight connections or manways that have gaskets and everything so those don't leak. The ones on top of reservoirs you have a 4 inch curb and a 2 inch overlap that are not water tight. I think as long as those are located above the floodplain we're fine. But for other accesses, at ground level, that's just like a (inaudible) on a pipe.

JEFFREY DUPLANTIS: When would a vent not be at the top? Otherwise just water running out from the inside.

RANDY HOLLIS: Talking about any penetrations and when you say any penetrations we need to clarify that so that we could put a manway below.

PATRICK KERR: All of our vents are supposed to be at ground level. As that tank level declines below the water level there's water on the outside we would in fact have siphonage back into the tank. It's something we have to design for. If we're going to design a tank to be inundated partially we have to make some changes. Might have a vapor break at the top or something like that, but it could be done. If we take a drain all the way to the ground and then bring the water level up outside the tank and use

the water in the tank we're going to have siphonage problems.

RANDY HOLLIS: We keep saying coastal areas, South Louisiana I'm working in Kentwood right now which is right at the Mississippi state line, and speaking of Mississippi State, but anyway, Kentwood is located within a stone's throw of the state line and we have a BFE that's 6 foot above ground surface where we're putting in a water well and a ground storage tank that's where the existing ones are. We're dealing with this not just in coastal areas, up in a very high elevation. It could happen in other locations. I think if we do what Pat's suggesting any vents or openings that occur on top of the tank that have to be above the BFE and then any other penetrations like manways as long as they're gasketed could be below the BFE. As far as having to have the lowest elevation below, above the BFE I think that's overkill on a watertight structure.

JAKE CAUSEY: I guess I'll just say that you're talking about a really sort of complex requirement there. Would you limit it to concrete tanks or steel bolted galvanized tanks to qualify?

PATRICK KERR: Any tank. They are waterproof, not waterproof, but water tight.

JAKE CAUSEY: And then the overflows I'm still not certain.

RANDY HOLLIS: I have to agree with Jake on that. I wouldn't put a steel tank below ground and bury it. I have to agree with you on that. I think we're talking about a concrete structure that's a water tight structure that's made to be below ground.

DIRK BARRIOS: This would include clear wells I would imagine.

JAKE CAUSEY: An exception except for concrete finished water tanks that are protected from inundation the way that you all were trying to describe. I guess we're talking about adding to the sentence shall be placed above the 100 year flood elevation at least 2 feet above the groundwater table and then provide, I guess sort of an exception, except for concrete finished water tanks, structure, whatever you want to

call them, that are protected from inundation.

PATRICK KERR: Even easier, we can just say ground level reservoir shall be designed to account for or to protect stored water from inundation up to say a 100 year plus 2, whatever number you want to put in there. They are designed to protect from inundation. The floor level doesn't matter. It's basically the beam of the tank. 7.0.2 just said ground level reservoirs shall be designed to protect from inundation or from contamination due to inundation up to the 100 year flood level or BFE cause the rest of it's mute. It doesn't matter what part of the state it's in the stored water needs to be protected from inundation. Ground level reservoirs shall be designed, constructed, installed, whatever you want to say, such that inundation up to the 100 year floodplain is something a design, what would you say, accounted for?

CHRIS RICHARD: Want to say protected because a lot of the areas along the coast talking about levies and they are protected. The area where it's built can be 10 feet below the 100 year flood elevation, but it's protected by the levy system of 100 year flood elevation. I think Dirk's concern is the storm surge which isn't necessarily 100 year flood. Sometimes FEMA maps have both. The problem with the storm surge is 20 feet above the ground it's tough to protect, especially your plant's probably already under water at that point.

J.T. LANE: Working through filing for claims.

PATRICK KERR: It would be nice if you had stored water that wasn't contaminated. Just say groundwater reservoirs shall be designed such that inundation of waters at the BFE will not cause contamination of the stored water and leave it at that. And then you guys figure out as design engineers what protections are necessary. And we take out something that's really an arbitrary measure, the floodplain elevation which Dirk objects to reasonably.

J.T. LANE: Is there anything else y'all want to add to that? Is there anything else?

JAKE CAUSEY: My only concern there's a lot of intricacies involved there and I don't know that what's protected or what's not protected has sort of been discussed. What you're going to do with overflow, what exactly the criteria are to be protected verses not. You can make a statement like that, but then frankly you get a lot of complaints about plan review process. Going through a tank for Dirk's system that he's going to build next year and we basically rehash this whole thing all over again. It's not ironed out.

J.T. LANE: I agree. Try to balance flexibility and being clear, don't want to be too clear that you're not flexible. The flexibility creates more work and back and forth between our staff and systems.

JAKE CAUSEY: Which is fine. We're happy to work through it as it comes up to insure that is met, but just since it's not specified every little point here that's what we'll be doing.

PATRICK KERR: If we don't change this language though it will require a waiver which is not something we should do. If we put the language you have to do a little more work, but it's doable.

RANDY HOLLIS: Can we make it this simple, we start off with A vents and curbed manways of ground level reservoir shall be placed above 100 year flood elevation at least 2 feet above the groundwater table. It's the only two things we're talking about, vents and curbed manways.

JEFFREY DUPLANTIS: Look at 7.0.9 E. Does that need to be revised now?

RANDY HOLLIS: That was a totally different subject we talked about last time as far as 24 inches above the roof.

JEFFREY DUPLANTIS: Says at the finished grade of the surrounding ground so should

that be 24 inches above the BFE to prevent the suction thing?

KEITH SHACKELFORD: You have an atmospheric vent at the top of the overflow anyway.

PATRICK KERR: Just using a scupper at the top.

RANDY HOLLIS: I don't see a problem with E either. I would leave it like it is. I guess the question is do we want vents and curbed manways at an elevation of the 100 year elevation plus 2 feet, or do we want just BFE. We're not talking about accessing the side of the tanks, gasketed pipe, talking about at the very top of the tank. Do we want it at the BFE or 2 feet above?

PATRICK KERR: This is location of reservoir. Basically this says you cannot install a groundwater tank if the base of the tank is not at least 2 feet above groundwater. It also says above the water table and above the 100 year floodplain. All we're saying is that matters not in the tank location if the tank is not going to be contaminated by inundation. The vents and all that stuff is a separate issue. Can I put a tank at BFE minus 5 and I say yes you can provided you design it in such a way that inundation is not going to occur. It's protected from contamination by inundation. Just leave it like it is and say 2 feet above the groundwater table unless protected from inundation at the 100 year flood elevation or the BFE. And then whether it's protected or not between the review engineer and design engineer.

CHRIS RICHARD: By protected you mean it could be a levy system. You can build 10 foot below the BFE and have your overflow down to the ground. New Orleans, Morgan City, they are protected. You don't have to build it differently.

PATRICK KERR: Protected includes any protected measures. Base flood elevation in a levy protected area is elevation of the (inaudible). No, it's not in the floodplain. They don't calculate the base flood elevation in a levy protected area, do they?

CHRIS RICHARD: Yes. It will still say base flood elevation is zero and you are protecting

it to.

PATRICK KERR: What language do we need to protect stored water from contamination?

CHRIS RICHARD: If you're going to say 100 year flood you need to say protected from the 100 year flood.

JAKE CAUSEY: For pumping stations you use the same language protected from 100 year flood.

RANDY HOLLIS: Clarify atmospheric openings.

PATRICK KERR: Just has to be protected from contamination. Any kind of opening that could introduce contamination into the tank should be above the base flood elevation.

RANDY HOLLIS: We don't need to clarify gasketed openings or anything cause manways are openings if they are on the side of the tank.

PATRICK KERR: That's designed to protect from contamination. Any kind of opening, I don't care what it is, if it's a crack they find at a sanitary survey it should be protected, should be sealed.

RANDY HOLLIS: I just like to clarify that with saying atmospheric openings then you've clarified anything like a curb, or a vent, or anything above the BFE. Just to say openings is concerning to me because are they going to say you can't have that gasketed opening on the side of the tank?

PATRICK KERR: I don't care.

RANDY HOLLIS: I do cause we're going to have to fight it later on. Do we say atmospheric openings? Under A are we starting that out by saying atmospheric openings on ground level reservoirs shall be placed above the 100 year flood elevation? How do we write that?

PATRICK KERR: It says the lowest elevation of the floor and sump of the ground level reservoir shall be placed and then it continues to say unless the design protects stored water from contamination by inundation period. If you have an opening on the tank you have to convince DHH that's not going to be a source of contamination for stored water.

RANDY HOLLIS: Okay. I just don't want to get into an issue down the road that we've got our sump below the 100 year flood elevation and they are saying nope you can't do that.

PATRICK KERR: I think all of Baton Rouge's are probably below the groundwater table.

RANDY HOLLIS: I would like to take that out of here so we're clarifying it's only the top of the tank.

PATRICK KERR: We're talking about a location. Where are you going to put the tank? It doesn't matter. All those other penetrations are dealt with in here.

RANDY HOLLIS: To me location is vertical not just horizontal.

PATRICK KERR: Jake, what do you want?

JAKE CAUSEY: I'm thoroughly confused. Let me ask this, if we just said the floor and sump floor of ground level reservoir shall be protected from the 100 year inundation or contamination including the groundwater table. We're not just saying 2 feet above, just any contamination whether it's surge, or groundwater, or whatever it is and just period.

RANDY HOLLIS: Take out place above and put in protected from.

CHRIS RICHARD: Take out groundwater table too because at what time of year are you talking about?

JAKE CAUSEY: Just says protected from. Instead of lowest elevation of scratch that and say the floor and sump floor ground level reservoirs shall be protected from instead

of being placed above the 100 year flood elevation and just say and the groundwater table. We can put contamination in there somewhere. That would just replace the first sentence in A. The lowest elevation of, so it will read the floor and sump floor of ground level reservoirs shall be and then delete placed above and insert protected from the 100 year flood elevation and delete at least 2 feet above. So after and delete at least 2 feet above leave the word groundwater and then delete the word table.

J.T. LANE: Does that work for everyone? What's next?

JIMMY GUIDRY: Before we move on it's not clear that what you said shall be protected from 100 year elevation inundation.

JAKE CAUSEY: The floor and sump floor groundwater of ground level reservoirs shall, well so shall be protected from contamination at the 100 year flood elevation. We'll stick those words in there. We would just put that at the end from inundation and contamination at the end of the sentence. At the end of the sentence after the word groundwater so it will read the floor and sump floor ground level reservoirs shall be protected. I guess it will say at the 100 or by the 100 year flood elevation and groundwater from contamination period.

DIRK BARRIOS: I think floor and sump floor should come out.

CHRIS RICHARD: The whole thing, not just the floor.

JEFFREY DUPLANTIS: The first word of that sentence should be ground.

JAKE CAUSEY: We're going to delete the floor and sump floor and we'll just start the sentence with ground level reservoirs shall be protected from contamination or should we say inundation?

J.T. LANE: What else?

JAKE CAUSEY: Read it one last time? Good, okay.

J.T. LANE: So what else?

RANDY HOLLIS: Under 7.0.18 disinfection, just a clarification that we're doing away with administrative code of 50 milligrams per liter 3 hours and we're going to go with AWWA which is 10 milligrams per liter 6 hours or the spray method of 200 milligrams per liter for 30 minutes and then we fill it up and take a sample. Getting rid of the 50 per 3 hours. Okay.

J.T. LANE: Any other comments?

DIRK BARRIOS: Just one and it's a question. On 7.0.13 freezing and I can maybe address this, Randy might understand it better than I do, says if a water circulation system is used it is recommended that the circulation pipe be located separate from the riser. My question is does it also include kind of like the design y'all use?

RANDY HOLLIS: And I covered this the last time it's recommended, it doesn't say it shall be located outside. So the word recommended says you can have it inside or outside. I gave up on that and said fine.

J.T. LANE: Any other questions, comments? We will get to work on making those final edits. Move on to number 9. We're going to make the final changes and then we'll vote. So for part 9 waste residuals.

RANDY HOLLIS: Under this is section 9.3 precipitative softening sludge B. This occurs throughout this document where we say approval from the Louisiana Department of Environmental Quality shall be obtained. I think it's incumbent upon the water plant or water system to obtain those permits. If we start dictating they shall obtain permits from DEQ I think it's overstepping our boundaries. I would like to strike it from land application all the way to obtain and let them handle that. If they get in trouble with DEQ they're in trouble with DEQ. I think we're overstepping our boundaries by dictating those types of permits. Later on in here we even talk about

TCLP and everything else. That's way overstepping our boundaries cause that's DEQ. The very last thing. On 9.8 arsenic waste residuals. Thank goodness we don't have to deal with that anymore, but still if someone is facing that under 9.8 it talks about TCLPs which is a total characteristic leaching procedure 5.0. What if that changes to 5.0? That's nothing to do with this.

J.T. LANE: Approval from DEQ is that why we included that as sort of a check and balance or something that should be done first or?

JAKE CAUSEY: I think I would agree that for B I guess an example item 1 through 6 B that would be something that would be done in accordance with whatever permit from DEQ, not something that we would specifically regulate or look at. I guess in essence really that part we could remove. So we do need to say something here about if you are going (inaudible) you have to do so in accordance with a permit granted by DEQ. We need to have something saying that if this is how you intend to dispose of your sludge because when we do issue certain permits we make sure other permits, maybe not have been completely obtained, but that our agency did kind of rely on one another. We could definitely squish this down more directly to that effect. Saying if you are going to choose this method that you do have to obtain a permit.

J.T. LANE: Approval of permit in accordance with DEQ regulation.

CHRIS RICHARD: What if a permit is not required? Land application of alum sludge does not require a permit so you're putting a requirement for a permit that you don't have to get.

JAKE CAUSEY: Put if required.

CHRIS RICHARD: I agree with not putting anything. It's up to the engineer and the owner. There's an exemption in the law that allows a plant that takes water from the

Mississippi River for instance to discharge their sludge back to the body of water which it came from without a permit.

J.T. LANE: I guess business, ease of doing business prospective, is it more helpful to at least include a mention of it. Often times yes I agree, often times we get, governments get criticized because we may not know what another department is doing or how they are interconnected. Is it at least worth making reference to it? And that's why I said in accordance with their rules and regulations so we don't have to worry about updating it if it meets certain requirements. I guess an easier read and just another way we could take that I guess.

CHRIS RICHARD: There's so many things you have to get. You might have to get a wetlands permit, a CORPS permit, a building permit. We're only handling one. I think whoever is doing the work needs to know what permits they need to obtain.

PATRICK KERR: Can we address all the waste maybe in two categories, sanitary waste and then treatment residuals and just say permits may be required from LDEQ. And then this applies not just to sludge, but all the other waste streams. Say the same thing about lagoons, designed lagoons, that all has to do with permitting that's required in advance anyway. Alum sludge, the same thing. I don't know other than telling people you may need permits from somebody else you lay out requirements in our rules that may very well differ from the regulatory body requirements.

KEITH SHACKELFORD: We already covered this actually in part 1 general, section 1 general part 1 where it says the design of facilities, excuse me, permits for construction to take water for waste discharges for stream crosses etc. may be required from other federal, state, or local agencies.

PATRICK KERR: If it's not you who's enforcing it it shouldn't be in our rules.

JAKE CAUSEY: I guess in a sense. Not on after operation, but certainly during a

permitting process. We would want to know how the waste is being disposed of, what have you. Not that you obtained them before we issue a permit, but we certainly would be looking at those aspects not regulative to that extent. That would be the reason for the reference. Different disposal methods. Sanitary sewer, that disposal method, we would absolutely regulate. We regulate sanitary sewers.

PATRICK KERR: I understand that, but it would be up to an agreement between the water treatment plant and the sanitary sewer provider whether it would be able to accept that waste stream.

JAKE CAUSEY: Yes and no. We certainly approve the sewers and to some extent if they were going to accept a waste treatment that was going to cause significant problems I would certainly say we may not permit. That situation hasn't come up, but obviously apparent we would definitely come to the table and ask a question.

RUSTY REEVES: The reason it's in there it was in the standards and we were trying to clarify from a committee standpoint to make sure the proper permits are required for these rural water systems. The big boys have engineers on staff that take care of everything. The little fellows in the woods.

CHRIS RICHARD: They got to get an engineer though.

RUSTY REEVES: They got to get an engineer, I realize that, but they still the ones that get caught without the permit.

RANDY HOLLIS: 10 state standards has gotten so watered down they don't even give you criteria anymore. Minimum depth of 5 feet or 2 feet all that's fine. When we start stipulating under B like 5 trace metal loadings.

RUSTY REEVES: Where it says reviewing authority we put DEQ in there trying to clarify some of the information to make sure it went to the right people. The system may be permitted by DHH, but then down the road they discharging and somebody didn't get

the discharge permit. And this happened over and over again with the rural water systems. And then all of a sudden they scratching because now they are dumping brine into a ditch that some farmer's pumping water out of. And other issues besides that there. I don't know if DEQ is the right authority. Somebody needs to review what they are fixing to dump in that ditch or whatever.

RANDY HOLLIS: Where are you reading reviewing authority?

RUSTY REEVES: In the original 10 state standards.

JAKE CAUSEY: That's what we replaced DEQ with.

RANDY HOLLIS: Under B.

RUSTY REEVES: And other places throughout here we tried to clarify at least where they need to start.

JAKE CAUSEY: I think we can delete 1 through 6 below which is what Randy was getting at. We can put behind shall be obtained comma, if required period. Just be two sentences there.

RANDY HOLLIS: The first sentence and then approved from DEQ if required.

RUSTY REEVES: And on that TCLP 26 systems in the state that have arsenic issues. I don't know if it applies to any of them.

J.T. LANE: Did we resolve the TCLP issue?

RANDY HOLLIS: Under B you only have the first sentence the application of liquid lime then the next sentence is approvable from DEQ shall be obtained if required. Everything else is deleted. And then you're going to ask that during the submittal stage. The last one is 9.8 and that is under arsenic. Maybe you consider hazardous and must have approved permits by DEQ if required.

JAKE CAUSEY: So 9.8 keep the first sentence and then just keep the last sentence.

RANDY HOLLIS: Yeah, that would be perfect.

JOSEPH YOUNG: On 9.3 the first two sentences is that necessary?

JAKE CAUSEY: It's not a specific requirement.

CHRIS RICHARD: None of it is a requirement in the entire section. I thought we talked about not putting shoulds in the code. If you go by what we agreed to earlier you scratch almost everything cause it's all just recommendations.

JAKE CAUSEY: We are going to end up with a lot of shoulds. We've removed a lot of them already.

J.T. LANE: Any other comments or questions? We will get those changes made and get a copy to everyone. With that we'll move on to part 1.

RANDY HOLLIS: Can I go back to one thing. Under 9.3 C talks about discharge of lime sludge to sanitary sewers. Under F mechanical dewatering of sludge may be considered. The third sentence mechanical dewatering shall be preceded by sludge concentration and chemical pre-treatment. That is a shall and I would like to take that out because there may be, as we discussed earlier, some technical advances that don't need mechanical dewatering prior to sludge concentration and I would like to take that sentence out so it's not mandated.

J.T. LANE: Is this based on if it's needed based on the first sentence saying maybe considered. Needed to be preceded by sludge concentration is that why?

RANDY HOLLIS: If you select mechanical dewatering as your alternative then it says you shall have mechanical dewatering before sludge concentration. I would just like to take the third sentence out because technology may advance to where we don't need that and we're making it mandatory.

JAKE CAUSEY: Instead of just change the shall to a should.

J.T. LANE: Not delete it, just change the shall to a should. Any final thoughts from that? So we'll proceed on with part 1 side by side for discussion. I don't know if there's any

other comments? Is there anything else you want to add?

KEITH SHACKELFORD: When we get into the comments I want to jump, frankly I don't have an issue with anything until we get to 1.2.1 subparagraph I, no L where DHH's comment is this is a basic system overview sheet it does need to be on one sheet rather than scattered about. If you're working on a very large system and you have improvements throughout the entire system to get all of that on one sheet the scale may be such you can't even read what's on there. Page 6. Part 1.2.1 paragraph L and DHH's comment was this location and nature of existing structures and appurtenances affecting the proposed improvements need to be on one sheet. Ideally yes, but once again Baton Rouge Water Company and you're doing improvements at every well site you can't get that all on one sheet and have it legible.

JAKE CAUSEY: I would agree with that. I've not yet got a project from Baton Rouge Water all wells simultaneously for one permit. But I don't disagree. Everything generally that we have received in permit something here and something there this is just basically saying overview sheet of where these improvements are happening. We can call it something else, we don't have to be I guess the absolute on one sheet, but just say that we need a basic overview if it's one or two sheets. Just that there's an overview of the project.

KEITH SHACKELFORD: The only other question, comment I have is moving down to the next group of DHH comments on page 6. Talks about additional discussion where we may need to change something to submarine crossings. I don't have any real heartburn with the suggestions, but I don't see any suggestive language to incorporate that.

CHRIS RICHARD: You're recommending put as built drawings, I recommend we use

record drawings. A legal difference and level of standard of care between an as build and a record drawing. A record drawing is sufficient for the needs.

JAKE CAUSEY: I'm curious to know the difference.

CHRIS RICHARD: For instance on a waterline if you're 5 feet from the road the as built says exactly as it was built whereas a record drawing is more of a general conformance with what was built. It may sound simple, but when you get in court it's not the same.

RANDY HOLLIS: Chris is exactly right. We cannot stamp a record drawing with our professional engineering stamp because the contractor provided the information to us and that's why our insurance policies say record drawings. We cannot stamp an as built drawing.

CHRIS RICHARD: And LAPELS just issued a policy last year saying that drawings should not be stamped by the engineer.

KEITH SHACKELFORD: Where you're laying pipe and variances on an hour by hour basis some of our clients don't pay for full time inspection so we don't have someone there that can see and measure and put that on the sheet. And like Randy and Chris said you're depending upon the contractor's mark ups and that just becomes a real issue.

CHRIS RICHARD: I think you're still getting what you want.

JAKE CAUSEY: So just explain to me what a record drawing basically would be plan spec, just that information, but not stamped, sealed, signed. It would be signed, just not sealed.

CHRIS RICHARD: There would be no stamp on it, basically the old term as built it's a historical document of what was constructed which is what you're after. It's not an as built, like an as built on this room would have to show where every outlet is, where every thermostat. If we move 4 feet we've got to redo your drawings cause

that's not how it was built.

JAKE CAUSEY: It would come with a signed cover letter that says this is what we found.

CHRIS RICHARD: Yeah. You can send it in and say the plan was built in general conformance with the approved plan specification.

KEITH SHACKELFORD: The letter they required doesn't say general.

RICK NOWLIN: We generally include in a letter based on the information provided by the construction contractor.

CHRIS RICHARD: Because anything that says warranty assurance or anything like that, professional liability, there's no coverage. Beyond the standard of care for engineering.

J.T. LANE: Go back to A submarine crossing. Get everyone's feedback.

JAKE CAUSEY: We had inserted this just as a point of reference as something we found. It's equally applicable here. I think we talked about changing the term from submarine stream crossing to just submarine crossing. I think part of it too we wanted to make sure we felt like we were all talking about the same thing. If that's the case and this looks like that then we can change the term and incorporate this information in there.

J.T. LANE: Any other questions or comments? Anyone wants to go through them?

JAKE CAUSEY: Comments on part 1. So the DHH 1 comment just with respect to when permits are required and basically our comment is to include what's currently in part 12 right here. That's currently the criteria today for when a permit is required to use that right there. Comment number 2 change reviewing authority to state health officer. Comment 3 was to delete the sentence, hard to tell frankly which oh, there it is, preliminary plans and engineer's report should be submitted a week prior to the preparation of final. Yeah we got enough, we don't need those. We can delete that

sentence. The last one our comment was that the should needs to be a shall. Comment number 5 I guess there was discussion about H and so I think this was the language I guess we had discussed rather identifying things specifically just say documentation of adequate source and supply. DHH 6 I guess just some clean up in that section. Say public water systems required by The Department of Health and Hospitals and The Office of Public Health to demonstrate adequate capacity. So this is just referring back to our existing capacity development regulations in title 28.

J.T. LANE: Any comments or questions on the first page?

PATRICK KERR: Why do you care about cost estimates?

JAKE CAUSEY: So that is something we have been tracking frankly for all of our plan review and permits, the cost estimate for the project. It's a data element that we're tracking for multiple purposes.

CHRIS RICHARD: We're required by law to do an estimate for building anyway, for public jobs.

JAKE CAUSEY: DHH 8 was just to change the word waterworks to water supply system just to conform with terminology. DHH 9 was to replace with I guess LAPELS instead of engineering registration requirements of the individual state or province. We'll just say requirements of The Louisiana Professional Engineering and Land Surveying.

J.T. LANE: Page 2, any comments on that?

JAKE CAUSEY: Next one is on page 5. I don't think we have any comments on page 3 or 4. The comment on page 5 DHH 10 is just to actually delete that section because it was redundant from I think what was on page 1 already. The next comment DHH 11 on page 6 so we changed H cause H says date, name, and address of the designing engineer. We were attempting to conform this to health requirements, seal, signature, and date of the Louisiana licensed professional engineer. But I guess now

that I'm looking at it that's kind of what I get to so that might be redundant. We can clean that up. DHH 13 we talked about 12. So what I wrote on here was noted on one sheet, noted on one sheet if possible. Just kind of leave it at that. Then so DHH 14 was the submarine crossing we discussed. DHH 15 going to leave record drawings. DHH 16 on page 7. For the laboratory facilities and equipment I guess it was inserted for all new plants. We indicated to delete that because this is only for permitting. This is submission of plans. This is only applicable when plans are submitted for a permit.

CHRIS RICHARD: Would that require laboratory facilities at all plants, unmanned plants?

PATRICK KERR: Our concern is the way this is written you have to have a laboratory facility at all plants and that's not necessarily so. We talked about several meetings ago we have the capacity to do the required testing and not have a laboratory facility. If B just said something like project including the capacity to perform required testing. I may form that out.

JAKE CAUSEY: So all of our supplies are required to have, quote unquote, approved laboratories unless they are only doing chlorine residuals. So maybe we could put something in there laboratory facilities equipment unless the system is only doing chlorine residuals cause otherwise you are required to have an approved lab based on the testing.

CHRIS RICHARD: The way it reads you have to have it at the plant. Talking about three remote plants, let's say iron removal plants, I have a central lab or I contract it out. The way I read this is I have to have one at each one of those plants which is not necessary. I don't have anybody at that plant.

J.T. LANE: Some language that said including an outline of lab capacities or services to perform the necessary test. Is that something?

CHRIS RICHARD: Or arrangements shall be made for laboratory analysis.

GREG GORDON: Or show that you have a contract that you have somebody under contract that does your analysis or you can show that you have a contract with that person or entity.

CHRIS RICHARD: Or another facility has your equipment.

JOSEPH YOUNG: You can do all that, but there's a word for those applicable sanitary components. Doesn't that cover that? In the first sentence those applicable sanitary components.

CHRIS RICHARD: We're doing a plant somewhere like for North Water District they're not going to have a lab, they don't have anybody there.

JOSEPH YOUNG: Then it's not applicable.

CHRIS RICHARD: He may still want the test run. They are still applicable to test, just not at that location.

JOSEPH YOUNG: If you don't have a lab then you're not providing specs.

PATRICK KERR: Why don't we just say in B set capacity to perform required laboratory analysis or perform required analysis and just leave it open?

JAKE CAUSEY: It's very general in it says laboratory facilities and equipment and I'm reading it I am thinking in the context of the system, not a specific facility.

PATRICK KERR: If we just said including the capacity to perform required testing or laboratory analysis. We can do it with a contractor, do it on site, whatever we need to do.

JAKE CAUSEY: Yeah. Laurie, did you get that? That was the last comment.

PATRICK KERR: I have a question about capacity. And I don't know whether this is the right, I don't quite know how to say this, but first of all we're not concerned in Baton Rouge about our sewer system supply 20 years forward. We are concerned that we

may not be using the same source supply we are using today. We may have to modify that. To what level are you going to scrutinize our projections? We're working with DEQ, working with DNR on protecting our groundwater, salt water contamination, etc. I can't tell you a permit application through today's method I can provide people water in Baton Rouge 20 years from now. What I can tell you is 20 years from now we will have water to whoever lives in Baton Rouge. I just want to make sure capacity doesn't become limiting in that or cost me a lot of money that actually we build these systems (inaudible). I can't tell you for example where Baton Rouge will put its next well field. So what exactly are you looking for? I don't think I can rely on an engineer to stamp something and say our current system can provide for the customers we're going to have 20 years from now. Especially 3% growth. Three percent is almost a doubling in 20 years. What are you looking for exactly?

JAKE CAUSEY: Probably nothing to the extent that what you are considering now. Really what we're going to be looking for is a basic engineer report on technical, managerial, and financial and anticipating impacts on smaller systems far greater than Baton Rouge Water would be concerned. And they are not looking 20 or 10, they're trying to make it to next year a lot of times. Not a lot of detail, we're not really, I guess it's been looked at, considered the rates and billing the engineer doing a project yeah they can pay for this with their rates. Very basic capacity stuff. Really to a level that we're doing it now. I wish I had a form because that might be something, that only three or four page questionnaire.

PATRICK KERR: Go back and find it more for an assurance by the system. There's another reference I believe.

JAKE CAUSEY: There was one later that we deleted.

RANDY HOLLIS: 1.1.5 C present and/or estimated yield of the sources of supply.

PATRICK KERR: For 20 years, right. Description of the population trends as indicated by available records and the estimated population which will be served for 20 years in the future. If I present to you that 20 years from now I need twice as much water as I have now are you going to ask me where am I going to get it? And if I tell you worse case from the river would that be adequate?

JAKE CAUSEY: For you it would be cause it's right there and you can use it. Where are you reading that?

PATRICK KERR: Page 2 1.1.5. I'm just concerned we will have to prove to you something that data today won't support. And what purpose does it serve? I have been in communities where they cannot provide for tomorrow's subdivision. I can't imagine it's going to happen in Baton Rouge, but it could happen in smaller systems. What's the 20 year thing? Basically I think you need to be able to demonstrate capacity to serve what you're adding.

JAKE CAUSEY: So certainly we wouldn't hold out permits today based on you're not certain where you'll get your water 20 years from now. As infrastructure is added to know that systems are thinking about that and at least preliminarily thought about is good, but no it's not going to hold up, absolutely not.

J.T. LANE: Submit with all the caveats you can possibly think of. Part of it we do have an interest in it in general and helps us also to get ahead of things as we look to the future to be more helpful to y'all or communities in general. More intel on what's going on. I think from that standpoint it's helpful.

CHRIS RICHARD: And that would only be applicable in increasing of plant capacity or increasing the users of the system. If you're adding or replacing lines or you're doing redundancy project that's not increasing.

RUSTY REEVES: Comes from the financial end cause we don't want to build a system

that we don't have water 20 years from now, especially all these smaller systems they don't know where tomorrow's water is coming from in some cases.

PATRICK KERR: I think we also talked about having a standard permit for main extensions. I don't see any language in this about that. They do improve proximate hydraulic conditions, but they really don't have a material effect on the system. If we come up with something that says yeah you can put in a line, how are we going to do that? Is it going to be in here?

CHRIS RICHARD: I sent the Florida permit we use for line extensions.

PATRICK KERR: I wish we would have something like that. I think it would reduce the burden on you significantly because you're doing a lot of plan review for line extensions that really have no impact on water quality. If the engineered certified we're going to build it 10 feet away from any sewage it should be an automatic permit in my mind.

JAKE CAUSEY: We have different experiences. That's about all I can say. We deal with a lot of different engineers across the state. You have boards, small systems wanting to do their own things, contractors pushing things. You get a hodgepodge of those things. To not look at those things I would have a lot of concerns.

PATRICK KERR: Individual systems apply for permits for standard specs and given a specific range of concerns they can install and submit record drawings.

JAKE CAUSEY: I'll say this, one of our bigger issues is development. Those happen in bigger systems and smaller systems. We've had a lot of issues with private developers wanting private water supply lines behind gated communities and a master meter upfront. And if something goes in that's stamped off on we don't know about these things unless we are reviewing those plans in advance. We've had a lot of those issues come up and that's how we're able to address them on the front end.

It's really costly at the back at that point in time.

PATRICK KERR: So I'll reiterate though, could a system, is there anything that can prevent a system from submitting standard specifications and assumptions and having a permit? For example, to do reconstruction on Essen lane. Pretty detailed pain in the neck project, but it doesn't change anything. We might upsize the pipe one size. We would love to be able to get in there and do our work rather than wait for a permit. We do all kinds of extensions. It just takes weeks or months sometimes to get permits for very simple things. A master meter and the plumbing behind that is what you're eluding to whether you have jurisdiction or not.

JAKE CAUSEY: Not always plumbing. We're talking about a line that serves multiple premises.

PATRICK KERR: It's plumbing. Downstream of a meter it's plumbing. Now should you regulate it, yes. That should be a regulated consecutive system in my mind.

JAKE CAUSEY: Which means it's not plumbing.

PATRICK KERR: I'll agree to disagree. The question stands can we make some kind of provision, and we can put whatever restrictions on it you want, but it would save a lot of time for you and I think a lot of money for us if we could have a standard spec that we can install under. And if we have a problem maybe we just shorten the period and you get seven days or something.

CHRIS RICHARD: You still send your plans and specs. You're still reviewing them, but what is does is outlines the things that are important to you that you're looking for and it says whether or not those have been addressed in the permit. If it hasn't been then you say you haven't and why you haven't so it clears up the review process. Did they do this, oh no they didn't. This is their explanation why, do I want to accept that or not it's up to you. The intent is to speed up the process for these small line

extensions and distribution systems to get one, two week turn around.

JAKE CAUSEY: I guess if they're not, at least from my view, I would say if it's not relative to a development if it's just for a water supply or getting from .A to .B in those context I can see that making some sense. But when you're talking about adding distribution lines in a development or for a development that's where we get into a lot of sticky issues. And so not seeing those in advance is just going to create bigger problems.

CHRIS RICHARD: You'll still get the plans and on that permit you can have one of your questions is this system served by a master meter. Something that will put a red flag so you can go more in depth on that particular submittal. Still coming in the same way it did before with this permit, but you have one of your questions is this served by master meter. A development that has a distribution system with 100 homes and so that person, that developer is going to be the water provider for those people. You'll know right off the bat. This one is coming from Baton Rouge Water Company or an extension of their system an engineer submitted.

JAKE CAUSEY: The way I'm reading it right now is kind of a little separate sort of fast track like a fast pass at Disney World limited specifically to water distribution lines not part of a development which I don't know.

J.T LANE: We'll take a look at it.

JAKE CAUSEY: I can see the community sewage system doing the same thing for their force main extension.

GREG GORDON: I think I agree with Pat and Chris that there needs to be something because we've been getting a lot of developers and people if you're doing line extension a cost of service to provide that line extension we are now waiting a full 60 or 90 days. We used to be able to say we could start ordering the parts or doing

some things, but as y'all have experienced budget cuts and staff cutbacks that makes it hard. So if you have something, those basic things you could do, extending a line from my system to this strip mall that has a dance thing that's trying to open up by a specific date we can extend to that because you start getting into, unfortunately with y'all, Baton Rouge Water we get the blow back from the people why is it taking so long for me just to get water and now I'm going to every elected official saying it's taking me forever to get something. I think that's important. I think in talking to somebody that works with Steven that used to be at DEQ I think it would be a good thing for DHH to look at, kind of like that fast pass where you can pay a little extra for the overtime so you can get something through quickly like DEQ does specifically. And as I always say to developers is that you want limited government, but then you want more people. You want your thing approved faster. But having something where something basic can get done in a timely manner would be a big help.

JAKE CAUSEY: Definitely gets stuck behind some larger projects.

PATRICK KERR: I know we don't want to go back to letters with no objections, but a permit. Just seems to me it would be wise in your permit you already tell us if we missed anything it's on you. Basically it says we did the best review we could, but if we miss something that needs to be fixed you got to fix it. Why couldn't we do that with a submittal that is basically a permit and if you find we've done something outside the requirements then you make us fix it. I would be willing to gamble that on these kind of extensions.

J.T. LANE: Any other feedback, part 1? We have some homework to do. We are at 11:45 right now. Do y'all want to break for lunch, reconvene at 1 and then we'll have the revision from 7 and 9 to do a follow up. A side by side for 2. Work for everybody? We'll reconvene at 1:00.

I think we're going to get started if everybody is ready. I think what we'll do is part 2 the side by side and then we will revisit 7 and 9.

JAKE CAUSEY: Looking at part 2 our first comment is on page 2 which I guess is just to change the reference from electric code or relevant standard and/or local codes to state requirements of the applicable codes adopted under the statute, a statewide uniform construction code statute in place that adopts these codes. Reflect the appropriate State of Louisiana statute for the local building codes. DHH comment 2. In reference I guess to the same provision that I guess there was, so I guess this was design standard and not sanitary survey. And so our comment was that particularly small systems, there are frequently electrical issues that can certainly impact the performance of that system. So certainly I guess our prospective was, at least in a general sense, exposed wiring and those sorts of things need to be part of sanitary surveys and therefore I guess not strictly a design standard. Maybe not to the extent of the electric code, but perhaps something to prevent exposed wiring or something to that affect with respect to these small systems because it is a frequent issue.

CHRIS RICHARD: I'm not on the electric code. If it's like the building code you're not required to keep, to bring things up to current code so you might be in compliance with NEC when it was constructed and not required to bring it up to today's standards, but still in compliance. Don't want to tell people bring it up to today's standard when it was okay for when it was constructed.

JAKE CAUSEY: You could probably just generally exposed wiring not laid in puddles of water, I don't know, it's pretty straight forward basic. I don't think it's like an upgrade code compliance issue. I think anybody could look at it and say this was never a good idea. Probably wasn't like that when it was built, modified thereafter. That's why I would say maybe some other statement that water systems shall not have exposed

wiring that is unsafe or something. Just something that cuts right to that point.

RANDY HOLLIS: I can tell you this surprised me. Knob and tube wiring, which is exposed, is still allowed to be left in place. You got to be careful when you start saying exposed. That's raw wires running through beams it's got ceramic tubes and you have a positive and a negative. That's still allowed. You have to be careful when you say exposed wiring because some of that may actually meet local building codes. I understand about danger and that, but we need to be careful when we start trying to rip something out that actually could meet codes.

JAKE CAUSEY: Frankly the only thing that comes to my mind is we're looking at small community water systems, trailer park who has 5 feet of wiring from the panel to the pressure switch and it's a hodgepodge of a mess.

RANDY HOLLIS: Isn't that more of a local building code issue to get the building official involved?

JAKE CAUSEY: From what we see that's certainly a reliability issue. You're going to have water outages, you're going to have pumps burn up, other things as a result of faulty wiring which impacts the water system.

JEFFREY DUPLANTIS: This has to do with design and not existing conditions.

RUSTY REEVES: I think what Jake's going at was most of this that's he's talking about is on small water systems a pump got changed out at 2:00 in the morning, didn't put the cover back and it's just laying there loose. Them kind of housekeeping more of things and probably is the local electoral inspector should be doing it, but he don't ever go there because it's a public facility. The only inspection these systems may get is from DHH. And I guess where I see most of it is the sanitary seal with the electrical wires running down there or whatever you call that, I don't even know what you call a connector on the top. Just wires running and raining on there every day. I don't

know how the wording needs to be in here.

JAKE CAUSEY: We're not checking wire size, all this other nonsense, just the basic stuff.

CHRIS RICHARD: I'll check with an electrical engineer we use a lot and ask for his input. We don't have to decide right now.

JAKE CAUSEY: DHH comment 3 I guess this was just a should, it wasn't a specific requirement. Adequate facilities should be included for job space and storage consistent with the designed facilities. We felt like that was a good recommendation to keep in there. Not a requirement. DHH 4 recommends deleting where laboratories are provided.

J.T. LANE: On 3 since the committee recommended deleting it what is our rational for keeping it?

JAKE CAUSEY: Adequate facilities should be included for shop space and storage consistent with the designed facilities. It's as simple as that. Water systems don't have stuff jumbled up inside a little pump shed and you can't get to some point in there that you need to. Again, this is just a recommendation.

JEFFREY DUPLANTIS: If it's not enforceable don't put it.

RUSTY REEVES: On some smaller systems stuff stored at the operator's house, and the secretary's house. One separate place to store.

JAKE CAUSEY: When he shows that to his manager and says hey in the code it says that I should have enough space. It's not a mandatory requirement. On DHH comment 4 I guess the sentence was modified to start where laboratories are provided. We recommended deleting that so it would just read each public water system shall have equipment and facilities for the routine daily laboratory testing necessary to insure the proper operations of the water supply system. I guess this gets back to maybe what we are discussing in part 1 as well.

KEITH SHACKELFORD: Put available.

JAKE CAUSEY: We can definitely mirror this after the approach we took in part 1.

DIRK BARRIOS: I think that's why we put where laboratories are provided because you won't have a laboratory in the area location.

PATRICK KERR: The difference between this and part 1 is part 1 was about plants and each pump station is a plant under the definition. So should a water system be able to test chlorine residuals, ordinary routine daily sampling, I don't think this is objectionable. You have to have it. It is different than part 1.

JAKE CAUSEY: Just says you have to have the ability to do testing.

PATRICK KERR: Shall have equipment and facilities for routine daily testing that can be by contract. It used to say its own. We took that out.

JAKE CAUSEY: Regardless whether you have a, quote unquote, lab you need to be able to do the testing. The next DHH comment number 5 was to replace the reviewing authority with state health officer. That was the same for comment number 6 as well. Comment number 7 so this is to insert after the word auxiliary facilities so it says where laboratory facilities are provided each public water system shall have sufficient bench space, adequate ventilation, lighting, storage room, sink, and auxiliary facilities shall be provided. After auxiliary facilities insert the following. So I guess it was just to insert a parenthesis after the word auxiliary facilities to give some examples. Everything that was going to be inserted is just in parenthesis after the word facilities I guess was examples. DHH comment 8 bottom of the same page. Insert the word own so the sentence in 2.11 would read please note that in some cases the take-off point of the water treatment plants own service connection line and finish water sample tap line may be downstream of the plant itself. Just trying to clear it up.

J.T. LANE: On number 7 since this is a shall statement, I know those are examples, is

that optional to the system in terms of what's needed?

JAKE CAUSEY: All of that certainly would be case by case on what lab you got, etc. It's not that those are all specifically required, just depends on your system and your testing, what might be needed or not.

PATRICK KERR: I read it like you do J.T. We need to take the shall if it's a recommendation. Put a period after laboratory sink and then pick up auxiliary facilities may include but not limited to blah, blah, blah. Should be provided as required, something like that.

JAKE CAUSEY: So the first sentence in that section a shall was included from the subcommittee shall have sufficient and so our only comment was to add some parenthesis and examples of what auxiliary facilities might be within labs. That was our only comment.

DIRK BARRIOS: After facilities where it says shall be provided just take it out.

JAKE CAUSEY: DHH comment 9 this was relative to section 2.12 wall castings. The section read consideration shall be given to providing extra wall castings built into the structure to facilitate future uses whenever pipes pass through walls of concrete structures. We thought I guess it was a good thing to leave it cause it just says to consider having some extra ones, doesn't say you have to install them. I think it would be a good thing for general design.

CHRIS RICHARD: How is that going to be enforceable? I considered it and I said no, I don't think it's necessary. There's a lot of ways to consider, we core existing structures all the time. You can put it in after the fact. An advantage of that is you're putting the right size and the location. My consideration is I'm not going to put it and so it doesn't need to be in the code.

RANDY HOLLIS: Let's just change shall to should and it takes care of it.

CHRIS RICHARD: Let's just leave it out.

JAKE CAUSEY: So DHH comment 10 I guess the section 2.13 originally entitled meters and then it was changed to flow meters. Same thing, just leave it as meters. I'm not sure why if the title, oh, it's flow measurements. Just a title, really doesn't matter.

DIRK BARRIOS: There are different ways of getting measurements.

JAKE CAUSEY: So DHH comment 11. Last sentence and the finished water was stricken. We recommended leaving it in, not sure why it's stricken. Certainly need to measure your flow from your finished water.

KEITH SHACKELFORD: I agree with leaving it in because that's how you're going to judge your system losses is the total of the finished water meter verses the total meter of the customers. That's more accurate than inferring the finished water flow by subtracting out your recycle, your backwash water from your initial production.

JAKE CAUSEY: On the other side for a groundwater system that has a flow meter on the water well that may be technically before treatment, but we wouldn't necessarily want a (inaudible) flow meter on the other side of the chlorinator just for that purpose.

PATRICK KERR: Or a ground water system that measures total flow. We use the total flow for treatment purposes, but we don't measure flow from each wellhead other than by time and total flow at the station. We don't meter each well, we meter the output so we can track chlorination and residuals. We use it for our equipment, all that kind of stuff. I say we, plenty of systems that don't have meters on each individual well. In the past during sanitary surveys we've been able to demonstrate to your satisfaction that we can calculate the flow from each of the wells based on tests and run times and stuff like that.

JAKE CAUSEY: In lieu of a meter on each well you have a meter for the total station.

Maybe we can just put an exception for groundwater systems. For groundwater systems a flow meter on the well discharge pipe before treatment. You wouldn't need another meter after. St. Tammany, they have a water well, a flow meter, and then they provide treatment thereafter. Technically your finished water isn't until after it's treated.

CHRIS RICHARD: You said you had the ability to measure finished water you got it. You took the first one equal to my end. It's not an exception. If it's a well going through pressure filters it comes out on the other end. What's coming out the wells is minus some backwater.

RUSTY REEVES: Of course to meter a different source and I'm trying to remember how that's worded in DNR.

PATRICK KERR: DNR requires that all flow be measured and you can measure it by metering at each well head or collectively.

JAKE CAUSEY: I'm good with that. We can just leave the finished water in there. DHH 12. I guess the first section was deleted that said for liquids or gases not listed above the previous section. I guess this is all part of 2.1.4. Liquids and gases not listed above unique color scheme and labeling should be used in situations where two colors do not have sufficient contrast to easily differentiate between them. Six inch band of contrasting color should be on one of the pipes at approximately 30 inch intervals. The name of the liquid or gas should also be on the pipe. In some cases it may be advantageous to provide arrows indicating the direction of flow. Our recommendation was to leave this section in there so the next section that is I guess new and inserted right below says in lieu of the color coding of pipes described above. And I think this next section is relative to the entirety of 2.1.4. It's not relative to this specific section on liquids and gas not listed above. I don't think that was relative to

that. We're talking about leaving this section for liquids or gases not listed above and it gives that criteria. And then this is a new section I guess that's proposed to be included in lieu of the color coding of pipes as described above all pipes may be painted similar colors as long as each and every pipe is banded and labeled in 5 foot intervals with the name of the liquid or gas clearly displayed on the pipe. Arrows indicating direction of flow should be included in this labeling or utilize other methods approved by the state health officer. Our comment on that was I guess just a reminder of the non-potable color requirement in the plumbing code. I guess try to make sure that, anyway I guess it was a point of information. I don't think that's something that we would include here, just something to think about in respect to these other color coding requirements. I guess really our basic recommendation is the stuff that was stricken for liquids or gases not listed above to leave that section in. We didn't really have an objection adding this last section that would allow some other alternative means to color code pipes as long as they are properly labeled and named.

RANDY HOLLIS: For those of us that's familiar with the plumbing code in general what is required as far as identification of a 3 quarter inch cooper line?

JAKE CAUSEY: So the plumbing code has specific color coding and/or identification requirements for non-potable water, not for potable. So the non-potable had to be a distinct yellow color and some signage indicating it was non potable. Pretty certain an ASME standard on identification of pipes that talks about labeling and distances and sections. There's a standard reference to the plumbing code about labeling identification. The basic requirement is that for non-potable pipes they have to be a distinct yellow color. In a water treatment plant you're going to have a lot of different non potable pipes so you don't want them all the same color. You just have

to have a system.

CHRIS RICHARD: Yellow is chlorine.

RANDY HOLLIS: Yellow is used for five different materials if you look on the previous page. Caustic, chlorine, ozone to sulfuric acid.

CHRIS RICHARD: Chlorine is strictly yellow. We took them and put like waste water plants we have signs that say non potable water at each hose, but not a particular color. If you put yellow at a waste water plant they will think it's chlorine.

JAKE CAUSEY: That was just one of the points that came up while we were reviewing that. That's something that exists in the plumbing code.

SPEAKER: I represent Dow Chemical Company. In earlier committee we discussed it and the way we had phrased it that in lieu of following the color code or the labeling that we would have approval from DHH of an alternative. That's not clear. I think that was maybe intended toward the end.

JAKE CAUSEY: You bring up a good point. There is actually a statute frankly in law that is specific to not just chemical manufacturing plants, but other plants I guess, refineries, etcetera that says in those cases that in lieu of identifying non potable water in yellow they can develop their own plan. I think they do a cross connection survey every five years in addition to that. We would need to include that statute by reference really in here which is kind of getting back to that last section. I think it would help if we refer back to, we can use the same language in that statue for chemical plants they have some definition of those in the statute that we can refer back in here to make sure we pull back in as well. The only recommendation we're making, or change I guess, is that for what's stricken in black above where it says liquids or gas not listed above a unique scheme, etcetera is to leave that in there. But at the end systems still have the option basically in developing their own scheme as

long as it distinguishes.

ROBERT BROU: If you did put that section back in it talks about 30 inch intervals and the next paragraph talks about 5 foot. Five feet apart that's very close. Thirty inches is almost ridiculous.

DIRK BARRIOS: When you get into some of these plants we have so many of these little lines if you have to put them every 5 feet it's going to almost look continuous.

JAKE CAUSEY: One thing to consider ASME standard that we had used it talks about in long runs and short runs and bends and Ts and elbows it kind of I think maybe addresses some of that. Maybe something we can try to share to at least look at to see if maybe that A we can just steal some language from it. Maybe we can get some of that and share. We'll look at that further. The next comment DHH 14. We recommend rewording the first sentence section 2.15 disinfection which currently reads all wells, pipes, tanks, and equipment which can convey or store potable water shall be disinfected in accordance with current AWWA procedures. This is getting back to the existing language we have in the code part 12 today that says water from new systems or from any new parts of existing systems shall not be furnished for consumer use until all wells, pipes, tanks, and equipment which can convey or store potable water are disinfected in accordance with section 353 A and B of this part in accordance with section 353 C of this part. The highly chlorinated water, etcetera, etcetera, I think all that comes from the code. So basically just insert the language we have in part 12 in this section.

CHRIS RICHARD: On 2.15 where it says to include the disinfectant dosage, contact time, and method of testing. We typically whatever method AWWA standard we don't tell them which one they have to do. Like on a tank if they want to spray the walls so we can't give you that information cause we don't know what it's going to be. Is that

really necessary if you're telling them to comply with that standard anyway? If you're approving all three why do you need to know at the time of approval which one? The first sentence includes the disinfectant dosage, contact time, and method of testing.

JAKE CAUSEY: You're not talking about in our comment. The second sentence in there, method of testing. I guess with what we're inserting there from the sanitary code talks about the method of testing to verify the procedure. You can probably scratch that.

PATRICK KERR: Your comment 14 there's no provision in here to provide water to people under a boil water advisory. It says we shall not make water available to anyone until it's come back from testing. We need to fix that. Also, I know we're going to argue about this until we're blue in the face, but depressurizing a line in a controlled situation should not result in a boil water advisory and what we're doing is causing a chicken little situation. The more we tell people boil their water when it doesn't need to be boiled the less compliance we're going to get when we really need it. It doesn't bother us at all to hang cards and tell people to boil their water. But I'll tell you from experience and talking to people after issuing those boil advisories I'm afraid they are not going to listen when it matters because we're doing too much of it. I think that is industry wide concern and it's not unfortunately being heard at the department level in the State of Louisiana. If we have a controlled environment, we dewater the hole, we have positive pressure before we cut into a line between certain valves, there's no reason to issue a boil advisory. Should we take samples at one point AWWA says, still says, I believe that you're not even required to take samples. I think that's ludicrous. I think we should take samples after we make a repair and if we find there to be a problem change our methods or reevaluate whether or not we should be issuing BWAs. We do work every day and I would love

for you to come out and see it. And we hang tags on doors and we get all kinds of calls from people should I really boil my water. How should I answer that question? Basically all we can say is read the notice that's approved by DHH. We're not going to tell you yes or no, but read the notice.

DIRK BARRIOS: Just to give an example we had an issue in one area that affected a school so the school shut down until we can get the negative sample two or three days.

JAKE CAUSEY: Because they had no water or because they were under a boil water advisory?

DIRK BARRIOS: Because they had a break and they were under a boil water advisory.

JAKE CAUSEY: I have seen schools respond differently in different places to boil advisories. Typically I have seen they would provide bottled water to the kids cause they couldn't use the fountains. They can flush commodes all day long. The other impact is the cafeteria and they certainly have procedures how they can operate under boil advisories. We have lots of restaurants that operate under boil advisories. We have procedures as well as including the use of hand sanitizers for hand washing. The school doesn't have to shut down when there's a boil advisory. They may choose to do so and that's certainly their call.

RUSTY REEVES: I think the boil advisories are necessary. Just an example in our little town the lead between the main and the meter broke, had to shut it down. School was out that Friday, but there's no labs open to get the sample ran. We could have had the sample to the lab Saturday morning and been clear for Monday morning, but Monday our little rural school had to bring in bottled water and made all the provisions you're talking about. If it happened Thursday it would have still been Monday before we could have gotten the sample ran.

JAKE CAUSEY: We run samples on the weekends all the time.

DIRK BARRIOS: How do you get a sample to that lab?

JAKE CAUSEY: You have to deliver it. You have to get the sample to the lab. Right now we have a lab in Metairie, Amite, and Shreveport. The lab in Metairie is moving to Baton Rouge.

RUSTY REEVES: That's fine for Baton Rouge water. You take us in Southeast Louisiana I have to pay a man six hours probably.

JAKE CAUSEY: A lot better than shutting the school down and bottled water.

RUSTY REEVES: We're increasingly putting the burden on the system to have to transport something that far. I'll be honest with you, we're going to do the boil advisory, but there's tons of them not doing it because they're just not going to do it till they get caught because the more and more we close labs down the more restrictive some of this gets. We're actually 20 miles what was the Lake Charles lab on one end of our systems. I just wanted to put that in there a lot of cost going to a lot of these things.

J.T. LANE: When we talk about the pressurization is that in general or in reference to the comment in number 1, comment 14.

PATRICK KERR: Basically what the department is requiring is that anytime for any reason if you depressurize below 20 PSI you issue a boil water advisory. I think if you have an unplanned depressurization that's not controlled you got to issue a boil water advisory. The line blew out and lost the pressure without any supervision. But if I go out to specifically cut a branch into a line and I close two valves and partially dewater that line in a clean hole there's no chance of contamination. Now could we get back siphonage from a connected customer, we could. Could a connected customer pump water back to our system today under pressure, absolutely. The risk

is not significant just because you're dewatering. We're not even dewatering, we're just opening the line, making a repair, and then resealing the line, flushing it, may or may not even chlorinate it. We normally on a small thing like that you chlorinate the materials, we swab with chlorine, contact time, re-pressurize and flush it. What we're doing now is we're then taking a sample, issuing a boil water advisory, and look at it for a year. Get folks to submit their results after the fact. We've not had a single positive result in a situation like that. If we're not getting any positive coliform, fecal or non-fecal, but no positive coliform samples, does telling the public to boil their water do any good or are you doing more harm? I think we're doing more harm by repeatedly doing boil water advisories. We have them in Baton Rouge every day. We notify you guys every day. Tens, dozens, hundreds of homes sometimes, but there's no reason for them to be under a boil water advisory other than it makes us feel good. I just wish there was a way in the code that you could have a system produce its own method or use the AWWA method and say if you follow these rules to sample to demonstrate that you did it right, but you don't have to issue a boil water advisory unless there's a problem with sampling. And maybe if the system has a problem with sampling after making a repair then you require them to issue a boil water advisory every time until they fix the problem. Identify the problem as a failure to correctly make your repairs instead of telling everybody to boil their water.

J.T. LANE: AWWA does not require that now?

PATRICK KERR: It's changing. C 651 is changing and basically what they're saying is they're going to build a matrix of whether it was a scheduled outage and exactly how the repairs were affected to tell you different levels of things you should do. In some cases boil water advisory is inadequate and we ought to be on the phone with you Dr. Guidry saying we need a boil water order or a do not use order. If there's

contamination in the system a boil water advisory isn't enough. If we introduce some chemical in the water I'm sorry a boil water advisory isn't going to cut it and I don't have the power to issue a do not use order, but you guys do. I can turn the water off, a big red button. I just wish you guys would entertain what has really been peer reviewed and about to be issued by AWWA.

CHERYL SLAVANT: People will get a boil advisory three days after the incident. In our area people call because they got a boil advisory maybe it's mailed three days after the incident and all they do is get frightened and they don't know what's going on and we get phone calls.

PATRICK KERR: I think that's another problem. Basically the way the rule is written we can mail it to you. We have to notify you within 48 or did we change it? Anyway, it can be in the media if it's a large system, it can be by mail or hang tag. The only one that's effective is to knock on the door of every person and make sure they know and that's still ineffective cause grandma just came in from out of town and used the water. Again, not helpful when those aren't real boil water advisories, but we do the best we can. Mailing them to somebody it takes you 48 hours to get the results and they get it three days later it doesn't work.

CHRIS RICHARD: What is the matrix of the standard?

JAKE CAUSEY: Last year AWWA presented on that. I know that since then there have been some studies come out about exposure during main breaks, depressurization events. So there was one in Norway that had some, I don't know, results that there were some increases in gastrointestinal illnesses. CDC started their own, I think they did one this past summer. And I think their results were we need to redesign our study and do it again and they presented on that. Nationally, yeah there's a lot of talk about that. Has anything been concluded no, but a lot of people have their

opinions.

J.T. LANE: Have any states taken action on it that don't require a boil advisory during controlled?

JAKE CAUSEY: From what I've seen and heard in the comments even in some of these presentations is that pressure falls below 20 a precautionary boil advisory. That's the rule of thumb, no matter what you're doing, no matter planned, unplanned, otherwise. Pressure drops below 20 PSI potential for back siphonage, cross connection, it becomes unknown at that point. Water systems are not water tight so when you have a pressure drop there's a potential. So stay above 20 that's always been the rule of thumb.

J.T. LANE: Does anybody else have any comments on this? Sounds like we have work to do.

RUSTY REEVES: Our system is going to continue to issue them, but we had a contractor working in the area and we went through 18 days by the time we got it lifted from a Thursday break that lifted Tuesday they broke it Wednesday. Kind of like Pat said, and I'm all for notifying, but after about the third one we issued it's on Facebook oh, really we have to boil our water. I think them peoples immune to boiling their water in that section of our system. On the other hand, I see the need for it just like the school deal. Two blocks from our water well 1.5 chlorine residual. We knew it was at the school within five minutes of turning the water back on. We feel the water was comfortable to drink that Friday afternoon, but we issued the boil advisory anyway so we could get the sample done. Like Ms. Slavant's talking about our peoples there door to door within 30 minutes of the water going off, post call, a Facebook page. They get notified a lot of times before their water even stops running to their house to boil water.

PATRICK KERR: We do need to address though that you don't have any provision in there a boil water advisory store water service.

JAKE CAUSEY: Yeah, the shall not be furnished for consumers use until all, etcetera.

PATRICK KERR: We need to put something in there about AWWA.

JAKE CAUSEY: Providing water.

PATRICK KERR: There's nothing in here that allows us to provide water service.

JAKE CAUSEY: Got you. Okay, DHH comment 15 2.18 safety consideration must be given to the safety of water plant personnel and visitors. The design must comply to all applicable safety codes and regulations that may include The Uniform Building Code. Then it goes on to a list of other codes. And then some items to be considered. It was struck through and stated to be determined by the regulating governing authority which typically is going to be the local building official which is where those permits are obtained. DHH recommends to write consideration shall be given to the safety of water plant personnel and visitors. The design shall comply with all applicable safety codes and regulations that include but are not limited to the codes adopted under authority of act 12 legislative session. So basically I guess just to retain that paragraph, but include in there the statute that adopts for the state their building codes. Then the other comment DHH 16 regarding flood protection. The section read other than surface water intakes all water supply facilities and water treatment plant access roads shall be protected to at least the 100 year flood elevation or maximum flood of record as required by the reviewing authority. A freeboard factor may also be required by the reviewing authority. So this was stricken to just state to be determined by the regulating governing authority. DHH's recommendation is to state other than surface water intakes all water supply facilities shall be protected to at least the 100 year flood elevation or maximum flood

of record. Water treatment facilities shall be readily accessible by access roads built to at least the 25 year flood level elevation and some other specifics. I know that information came from some previous discussion on this topic. It's been a while. We did insert protected to at least a 100 year flood elevation. I guess we were trying to get back to that same approach we were taking with 100 year flood elevation. I do recall I think maybe the first time we had considered this part 2 for the access roads recommended that we use the 25 year flood level at that time. That's what we inserted back in here with some of the results that I discussed.

CHRIS RICHARD: On the 100 year flood I'll let Dirk handle the 100 year flood, but I would take out I think we had talked about it before the highest flood of record. You could have a millennium flood happen once in the history of the world and you are making them build above it. As far as the 25 year flood I'm not aware who publishes 25 foot flood elevation. I think it doesn't serve any purpose to build a road, a driveway above a certain level when the roads leading up to it don't meet that same standard. It's kind of pointless to have your road up high because you can't get to it except by boat.

DIRK BARRIOS: 100 year flood elevation, again I can only say ditto from what I said earlier. It's basically requiring, I don't see where we get into the requiring the water systems to build to a certain elevation. That should be to the governing authority that requires building.

JAKE CAUSEY: Let me just ask this question. So we permit water systems to not operate during a flooding event. I don't think we would be doing our job as the safe drinking water program permitting water system facilities if none of them can operate during a flood. I think there's an expectation.

DIRK BARRIOS: Okay, so you're telling me anytime there's a hurricane in the South

Louisiana we got to abandon our water plants. My guys are going to love you cause I tell them they can't leave.

JAKE CAUSEY: That's not what I said.

DIRK BARRIOS: You're saying we can't operate during a flooding event.

JAKE CAUSEY: That's not what I was saying. You need to be able to operate and that is our job as a drinking water program.

DIRK BARRIOS: There's other ways of protecting besides building to that elevation.

JAKE CAUSEY: Absolutely. Agreed. We did use the word shall be protected.

DIRK BARRIOS: The reason I'm concerned is we're looking at an expansion line existing plant in Thibodaux, but it's 2000 feet off the highway. Because of the hydraulics of the existing plant if we're forced to do things like this right here we may have a hard time building it on the property we have. Because if hydraulics won't match almost going to have to be two independent plants rather than a plant with an extension or an improvement to it.

CHRIS RICHARD: That's your grandfather clause.

DIRK BARRIOS: Not for new construction.

CHRIS RICHARD: Adding on for an existing facility.

DIRK BARRIOS: If that's the case then I don't have a problem.

PATRICK KERR: This is different than what we talked about earlier. You may have to elevate your switch gear, motors, and that's all this says.

CHRIS RICHARD: The comment about the roads and 25 years before we go too far. I think that should be stricken.

JAKE CAUSEY: We struck maximum flood of record. I guess the only other thing is the access roads. So originally we left those in and I know we had discussion, this 25 year flood level and all that came from original discussions here. I know that during

flooding events that area for people to work within that is the same level of protection as the facility itself. It's been critical for bringing in generators and other things. If you don't have an area to bring stuff in that access road has served as that.

CHRIS RICHARD: That public road connecting to it doesn't build to that same standard so it doesn't matter. I'm not aware of who publishes a 25 foot elevation I'm to build to.

JAKE CAUSEY: We did not come up with that number. That has no meaning then we don't need to use it. We can scratch access roads, but I'm trying to remember there was one permit recently, City of Walker.

RUSTY REEVES: On the access roads could you say at least to the elevation of the existing parish or state road that's there?

JAKE CAUSEY: We were just looking for the access road frankly to be protected to the same elevation as the site in general.

PATRICK KERR: Why not strike that and use your last paragraph. The last sentence. They have to prove to you if they can't get there on the road they have a means of getting supplies there in a flood situation.

JAKE CAUSEY: That's good. We'll scratch water treatment facilities accessible all the way through and keep this last paragraph.

J.T. LANE: Any comments on comment 15?

ROBERT BROU: I guess it's really just to get some clarification, talks about applicable regulations and includes OSHA as a municipality. We are not subject to OSHA, would that just not be applicable to us?

JAKE CAUSEY: Yeah. Keep in mind that even that section is not something that we are going to be reviewing for anyway. Just the local building official.

PATRICK KERR: Why don't you take it out?

JAKE CAUSEY: Because it's very relevant to the water system design. The last comment 17 on the back of the last page. Section 2.21 chemicals and water contact materials. So this is the NSF, the AWWA and NSF standards for chemicals and water contact materials which would be pipes, etcetera, tanks. So the note said deleted the section handled in chapter 5. And then DHH comment says chapter 5 does not address water contact materials, only relevant to chemicals. May need to specify the standards here for water contact materials. And I guess if the chemicals want to be addressed in 5 that would be fine. I don't think chapter 5 is going to address both. Or we can just leave it here. I think what we propose just said chemical water contact materials shall meet the appropriate standard there. It's fine to leave here, pretty short sentence.

DIRK BARRIOS: We were being pretty specific on what we're allowing in your comment. We have to deal with this chemical, but it didn't meet UL certification and we threw them out. We're finding out that UL is approved. Anyway, I guess that's the confusion in here when guys like us that don't deal with all the different types of certification and he says he can meet this, but can't meet that one and we put in our spec it kind of messes things up. I guess just to try to get some more clarification.

JAKE CAUSEY: For the chemicals it's fairly simple, one standard NSF 60, but so what may be confusing is that other listing agencies can certify a product to that NSF standard. UL can certify and list a product to NSF 60 standard and there are others.

DIRK BARRIOS: I think it cost us money to get the NSF 60 standard certification, right? If they have the UL certification they don't want to pay for the other one, but it's the same product.

JAKE CAUSEY: So UL is going to certify the product to that NSF 60 standard so the standard it has to meet is the same, who is certifying that product to meet that

standard would be a different entity.

DIRK BARRIOS: Where we ran into a problem is the way our specification was written. It didn't allow UL certification, it just said, and I think forget exactly what it is, but that's where we ran into the problem.

JAKE CAUSEY: You just want to say the product is certified to meet that standard and you would want to know that the agency who certified it meets that standard, meets the criteria for being able to certify that it meets that standard. It definitely gets very deep and I've been in that a great deal with a lot of other standards and certifications. We can perhaps help review your specs for you so it gives you that latitude to make sure it does meet that standard, but other agencies who are approved.

CHRIS RICHARD: You're saying it doesn't have to be approved by NSF, say it meets the NSF standard. But has to be approved by some recognized agency?

JAKE CAUSEY: Yeah. It's got to be certified and listed as meeting that standard. It just doesn't have to be done by NSF, can be done by someone else who meets the criteria to do that.

DIRK BARRIOS: Didn't have anything to do with UL the way it was written.

JAKE CAUSEY: That's not the intent here. That's all the comments.

RANDY HOLLIS: When we talk about water contact materials I go back to this some time ago. We're talking about materials in direct contact with the water, not the steel, not the welding of the steel if it's coated properly, but we're not talking about the pit filler either. We're talking about if it's got two coats of approved NSF paint on top of it we're okay. Is that right?

JAKE CAUSEY: So I do remember this question coming up and I remember that we were supposed to look into that and I don't remember looking into that.

RANDY HOLLIS: It's because of the issues of the cost of NSF certification some of the

companies don't make NSF pit fillers, but we have two coats of epoxy on top of it that is NSF approved.

JAKE CAUSEY: I remember this coming up. We definitely need to.

RICK NOWLIN: Jake going back to 2.6 standby power, let's talk hypothetically for a second. I may have two rural water systems interconnected and they're in timberland so every time we have a storm come through trees are down and power is knocked out and neither one of them have generators, hypothetically speaking. At our council meeting last week we approved the reprogramming of an L gap grant to purchase a generator for one of the systems. That system has capacity to serve both systems and they're presently interconnected, they actually exchange water on some basis. Would an interconnection between two systems with one having a generator and excess capacity meet the requirements of 2.6?

JAKE CAUSEY: That's a good question. I'm thinking that's something that would worry me that we would accept, but I would say that's not a question I've ever been asked before, really haven't given a lot of thought about. It sounds feasible. Is the connection typically open? That would be part of the question would be they have an interconnection, but is it like an emergency connection?

RICK NOWLIN: It's an emergency so either one can supply to the other.

JAKE CAUSEY: I guess we're really looking at it more of a case by case if they have adequate storage.

RICK NOWLIN: Not automatically in violation of 2.6 you'd have to look into it?

JAKE CAUSEY: Yeah, we would definitely consider it if the intent is met, I guess if you will.

J.T. LANE: Any other comments on part 2? With that we'll go, everybody has a copy of revised part 7 and 9. If we could quickly look at those.

DIRK BARRIOS: Just one general question on part 2. It was asked of me and I couldn't answer it. On sample taps says sample taps shall be provided so that water samples can be obtained from each water source and from appropriate locations in each unit operation of treatment and finished water. The question came in where it says from appropriate location to each operation of treatment such as can you (inaudible) it. I couldn't answer the question. Sample taps shall be provided so that water samples can be obtained from each water source and from the appropriate location that each unit operation of treatment and from the finished water. From finished water I don't have a problem with. Raw water coming in we can make a tap on the raw water line coming in. We can take samples, we know how to take samples, but it describes the kind of taps you have to have after that and I don't know how you can 1 foot wad thick of concrete wall penetrate the wall and put a sample tap.

CHRIS RICHARD: Provisions for sampling shall be provided.

DIRK BARRIOS: It's just confusing I guess what I'm trying to say. It says taps shall be consistent with sampling needs and shall not be dot, dot, dot. It kind of almost implies that you have to have a facet and I don't know how you can put a faucet on a chamber or a settlement basin. We take samples, but we don't take the samples that way.

JAKE CAUSEY: I don't disagree. I think the biggest challenge is solid contact clarifiers, (inaudible) set basins. It's all gravity, no pressure. You're not going to install a tap unless you go below.

CHRIS RICHARD: Put provisions for sampling, the ability to sample in each process.

PATRICK KERR: Can you just say sample sites instead of taps? We took the word tap out, other than for bac-t. You have to make provisions to sample. If you just call that section sampling you can just say facilities shall provide, to be provided so that water

samples can be obtained from each water source, etcetera. Take the word tap out. And the last sentence about bac-t you were going to use smooth. I think it calls for stainless, does this say stainless? Other parts of the code you say stainless.

J.T. LANE: Any other comments in 2? With that we will move over to part 7 and 9. I don't know if ya'll had a chance to look through. We had changes in 7.0.2 A. Looks like the changes we discussed were made.

JAKE CAUSEY: There was only one change.

KEITH SHACKELFORD: Do we need the word requirements after elevation?

CHRIS RICHARD: What we said was the sentence would read ground level reservoirs shall be protected from 100 year flood elevation and groundwater contamination.

JAKE CAUSEY: Yeah we maybe can delete the word requirement, but move the word contamination to the front. It was wordy at the end. Everything else is exactly the same.

PATRICK KERR: Groundwater reservoirs shall be protected from 100 year flood elevation and groundwater contamination.

KEITH SHACKELFORD: Protected from the 100 year flood elevation. Contamination resulting.

PATRICK KERR: Maybe it should say groundwater reservoirs shall be protected from contamination at the 100 year flood elevation and from groundwater infiltration.

J.T. LANE: So 7.0.2 A the first sentence will read ground level reservoirs shall be protected from contamination at the 100 year flood elevation and groundwater infiltration. Any other comments or questions on part 7? So with that change what we just outlined can I get a motion to approve part 7? Pat moves. Robert seconds. Any objections? Awesome. And then chapter 9 page 2 of 7 we edited 9.3 ended with obtain and required and deleted 1 through 6. Edited F, delete two sentences in that

section. And then on 7 of 7 9.8 arsenic waste residuals. We deleted, we kept the first and last sentence, deleted the sentence in between. Are there any questions?

PATRICK KERR: One other technical change. Grant approval in that same paragraph 9.A I think they either can require a permit or issue a letter of no objection, but they won't approve it, right? They don't give you an approval. A discharge permit where they say we have no objection, which they'll tell you it's not an approval. I don't know if approval is the right.

JAKE CAUSEY: Contacted for approval.

PATRICK KERR: If you don't have a permit requirement they don't approve they just say thanks for contacting us.

JAKE CAUSEY: We've been putting if required. Contacted for approval if required.

PATRICK KERR: That's fine, but they don't have an approval. Either they give you a permit or they don't.

JAKE CAUSEY: Oh, well than say contact for a permit if required.

J.T. LANE: The LDEQ must be contacted for a permit if required.

JAKE CAUSEY: Prior to disposal.

JIMMY HAGAN: Last sentence of 9.7.

PATRICK KERR: Why don't we just say necessary approval shall be obtained from LDEQ in both places? Necessary approval shall be obtained so if you don't need an approval you don't have to get anything.

RANDY HOLLIS: Same thing under 9.8 change to arsenic.

PATRICK KERR: Check my thinking though, if we're discharging arsenic through a lagoon and then farming it in quantities below the TCLP requirement.

CHRIS RICHARD: TCLP is hazardous material. If you fail a TCLP you're in a whole nother world.

PATRICK KERR: My point is if it doesn't rise to a permit required level you just dispose of it as you're allowed to.

CHRIS RICHARD: If you have a discharge to a ditch or anything you need a permit.

PATRICK KERR: If we take lime sludge that's got some arsenic in it just from contact we don't need a DEQ permit unless we exceed the limits that DEQ would regulate, correct?

RANDY HOLLIS: Correct, you have to contact and go through that process with them and they'll tell you you don't need a permit.

PATRICK KERR: So just necessary approval.

RUSTY REEVES: Looking back to 9.4.3 at the end says disposal that has been approved by the appropriate reviewing authority or authorities. Would that language also fit in other places? Not saying they have to get a permit, just said disposal has been approved.

RANDY HOLLIS: The problem with that is when you go to DEQ they may give you a letter of no objection, but they're not going to give you an approval. We have a water well here in town we're discharging to Mississippi and we have no permit because they will not issue us a permit. It's considered an irrigation well. If they permit ours they'll have to permit every irrigation well in this state. We got a letter of no objection.

CHRIS RICHARD: There may be instances that your arsenic or levels in your lime sludge that are higher that require a permit because there's a total that the land can have. But again, when you get with DEQ they're going to tell you get a permit and then you're going to have to start monitoring your land application or say if you don't have anything you're good to go.

RANDY HOLLIS: DEQ is the one that dictates that.

JAKE CAUSEY: I think what Pat said just say necessary approval shall be obtained from

LDEQ prior to, we can modify them to read exactly that.

RANDY HOLLIS: On page 2 you left a sentence there we wanted to take out. On page 2 3B we were going to take out the second sentence. Prior to land application chemical analysis of the sludge including calcium and heavy metals shall be conducted.

JAKE CAUSEY: On page 2 of 7 3B, we just need to delete the middle sentence.

PATRICK KERR: 9.4.2 B not 9.4.2.3 B.

JAKE CAUSEY: The next one 9.4.3 so just modify the end of that instead of saying disposal approved by the appropriate reviewing authority and I guess and necessary approvals have been obtained with required.

J.T. LANE: Is that 9.4.3?

JAKE CAUSEY: Yeah. Maybe say and disposal has been approved by the LDEQ if required. The last sentence of 9.7. All you have to do is insert the word necessary in front of approval.

J.T. LANE: I have four additional changes. Do y'all want to see a final copy? Are there any other comments on subchapter 9? We have four additional changes we are going to make. With that while we're working on that Greg if you want to do your subcommittee report. Heard you got stuck in traffic this morning.

GREG GORDON: I'll run through it real quick. Thanks to Rusty, Keith, Steve who was at one of the meetings, Ms. Caryn and Sydney for helping us through the process. Try to do this as quickly as possible. Part 3 source, 3.0 under general. Change the reviewing authority to state health officer and other applicable reviewing authorities. And that same paragraph took out reviewing authority, put state health officer. In general design standards for new systems and sanitary survey. 3.1 surface water. It would be under design standard for new systems or improvements, also sanitary survey. Again, sanitary survey going forward depending on how the grandfather clause reads

when it's finally developed and approved. 3.1.1, if anybody has a question throw something at me, get my attention, please do. 3.1.1 quantity, no real changes to this. It would be under design standard for new systems and/or improvements, enforced on sanitary survey. 3.1.2 quality. No changes within this we discussed at the subcommittee meeting. It would be under design standard for new systems and improvements and of course sanitary survey. 3.1.3 no portion of this will be placed in the new standards. Minimum treatment. 3.1.4.1 design of intake structures shall provide for and A included as determined by the state health officer. Subsection C frazil ice was deleted. Proposed to be deleted. No other changes and that would be under design standards for new systems and improvements and the sanitary survey. 3.1.4.2 raw water pumping wells shall. No changes, however the design standard for new systems and improvements subcommittee members thought this section should not be enforced on sanitary surveys and should be discussed in the to be developed grandfather clause. DHH representatives thought this language should be enforced in sanitary surveys. All of those in attendance at that meeting agreed that section needs to be consistent with language in part 2 sections 2.20 and 2.5. 3.1.4.3 off stream raw water storage reservoir. No changes were discussed or at that subcommittee meeting. It would be design standard for new systems and/or improvements on the sanitary survey. 3.1.5. Zebra mussel control. Title would proposed be changed to nuisance plant or animal control. Subsection B plant would be deleted and facility utilized in its stead. Subsection F the control zebra mussel would be deleted and add the language nuisance plant and animal control. It would be enforced on the design standard for new systems and/or improvements and enforced on the sanitary survey. Under 3.1.6.1 site preparation under impoundments and reservoirs. Subsection C delete or take out reviewing authority

and instead add Department of Natural Resources, Office of Conservation and state health officer. This would be under design standard for new systems and/or improvements and enforced on the sanitary survey. Under 3.1.6.2 construction may require, that section was proposed to be deleted. 3.1.6.3 water supply dams. Said say be taken out. 3.1.7 security also be taken out. Considering security has been discussed in a number of other sections. 3.2 groundwater. Under 3.2.1.1 source capacity. That whole section that's going to be a design standard for new systems and/or improvements. 3.2.1.2 number of sources. This gets into the two sources. Design standard for new systems, also enforced in the sanitary survey for those water wells designed, permitted, constructed after the date be specified with the developed grandfathered clause. The requirement needs to be discussed during the development of the grandfather clause. This is something that all the subcommittee members felt should be done. Other discussion during the subcommittee meeting centered around the required two sources as a recommendation only and/or a secondary source based upon a number of connections. There was also some talk about, and the person I talked about this at the break about, just two sources become that people just need to know that's the level playing field for everybody going forward in the future. Just going to have to live with it. But knowing that number of sources is an issue for developers and others, home builders and such statewide, so I assume whatever happens with this will be closely monitored by those who are interested in the to be developed standard. 3.2.1.3 standby power. The design standard for new systems also enforced on sanitary surveys for those water wells designed, permitted, constructed after the date specified to be developed grandfather clause. Again, subcommittee members felt the requirement needs to be discussed during the development of the grandfather clause. And this section needs

to be coordinated with part 2 section 2.6. 3.2.2 quality. No changes to that, but a design standard for new systems and/or improvements enforced on the sanitary survey. Microbiological quality. No changes to that, but a design standard for new systems and/or improvements and enforced on the sanitary survey. 3.2.2.2 physical, chemical, radiological characteristics. Be a design standard for new systems and/or improvements. 3.2.3 well location. Deleting 3.2.3.1 reviewing authority and adding state health officer. And adding the sentence at the end to say Department of Natural Resources, Office of Conservation, other groundwater authorities shall be consulted relative to proper groundwater development. It would be a design standard for new systems and improvements. Subcommittee members pointed out that the language in the this section is already covered in administrative code part 51, part XII 327.A.2 Most subcommittee members and DHH representatives pointed that out. 3.2.3.2 continued sanitary protection. Fencing of the site may be required by the reviewing authority was proposed to be stricken. We had design standard for new systems and/or improvements. And 3.2.3.3 wellhead protection. The word plan would be deleted and read a wellhead protection assessment. It would be under design standard for new systems and/or improvements. In 3.2.4 general well construction right under that 3.2.4.1. No changes. You can see it would be a design standard for new systems and/or improvements. 3.2.4.2 minimum protected depths. No changes, however it was noted that it would be a design standard for new systems and/or improvements. It's already covered in part 12 so they may not need to be actually included. In 3.2.4.3 surface or temporary steel casing, a design standard for new systems and/or improvements. No changes to that. 3.2.4.4 permanent steel casing pipe. No proposed changes aside from the design standard for new systems and/or improvements. Subcommittee members also noted similar

language in administrative code 56:I325 D F and H. 3.2.4.5 PVC well casing. Again, no changes. However design standard for new systems and/or improvements. The subcommittee also noted similar language in other portions of the administrative code. For 3.2.4.6 other nonferrous casing materials. Design standard for new systems and/or improvements. 3.2.4.7 packers. Design standard for new systems and/or improvements, changes to any of that. 3.2.4.8 screens. No proposed changes to that. Design standard new systems and/or improvements. Subcommittee members also noted similar language in parts of the administrative code already. Giving this redundancy. 3.2.4.9 grouting requirements. There were no changes discussed to any portion of that section. However, at the very end of it the subcommittee members noted similar language in the administrative code currently exists. 3.2.4.10 upper terminal well construction. No changes. And actually there were no proposed changes to the rest of any of those sections. And design standards for new systems and/or improvements. Getting down to 3.2.5.2 plumbness and alignment requirements. Would be a design standard for new systems and/or improvements. 3.2.5.3 geological data shall be a design standard for new systems and/or improvements. 3.2.5.4 retention of records would be enforced on the sanitary survey. Under 3.2.6 aquifer types and construction methods, special conditions. Under sand or gravel wells would be a design standard in that language, no proposed changes to it. Would be considered a design standard for new systems and/or improvements. 3.2.6.2 gravel pack material. No purposed changes to any portion of that section. All under design standard for new systems and/or improvements. Under 3.2.6.3 no proposed changes to any of that language. It would be considered a design standard for new systems and/or improvements. 3.2.6.4 infiltration lines. No proposed changes to any of that language, but considered a

design standard for new systems and/or improvements. 3.2.6.5 limestone or sandstone wells. No changes to that language. Design standard for new systems and/or improvements. 3.2.6.6 naturally flowing wells, no changes to that language. However design standard for new systems also enforce sanitary surveys for those wells designed, permitted, and constructed after the date specified in the to be developed grandfather clause. Subcommittee members felt the requirement needs to be discussed or developed in the grandfather clause. Other discussion at the subcommittee meeting concerned the language in A and the need to clarify quote require special consideration and in B relative in the to be developed grandfather clause. In 3.2.7 well pumps, discharge piping, appurtenances. Really no changes, any proposed change to the language. And that, since we've been here a long time, that's all throughout the rest of this subcommittee report. There were no proposed changes to any of the language. Anybody has any questions?

ROBERT BROU: On 3.1.5 change the title to nuisance plant or animal control, but in the very next sentence you still have control.

GREG GORDON: Okay, thank you.

PATRICK KERR: On that same page 3.1.6 C I think DEQ has requirements for well abandonment. It has nothing to do with the threat of inundation. It's when it's no longer useful it has to be abandoned and that is an issue because 20 years later you find the well that people have been throwing things down for years if they are no longer in use.

GREG GORDON: Department of Natural Resources, Office of Conservation, Louisiana Department of Environmental Quality and the state health officer.

PATRICK KERR: I don't know if DNR has a standard for well abandonment, but other than for oil and gas. But for water wells it's DEQ, right?

GREG GORDON: I think that was something Mr. Sydney actually really recommended.

JAKE CAUSEY: DNR. It used to be DOTD and now it's DNR.

PATRICK KERR: My issue is it's not if wells will be inundated, they should be properly abandoned if they are no longer used as a water supply.

CHRIS RICHARD: Not necessarily. There are some wells, we have one in North Louisiana, they still have in service and they're using it with USGS to collect samples. It's not being used for a water source anymore, but a potential exists so they're not going to plug it, but periodically run it.

GREG GORDON: 3.1.6.1 site preparation and under C abandonment of all wells.

J.T. LANE: On 3.2.3.3 wellhead protection there's an assessment done, let's say the assessment assesses that you need a plan, should we add that?

GREG GORDON: The subcommittee discussed striking the word plan and adding the word assessment. You're asking that if the assessment says you should have something then you should have some kind of plan?

J.T. LANE: I like doing an assessment, but if they come back and say you need some sort of plan to respond to any need identified, should we, and maybe I don't understand it fully.

JAKE CAUSEY: I did have one comment in that same section 3.2 and 3.2.3.3 the wellhead protection can kind of go up to a mile radius from the well. But one thing, I don't know if it was brought up, I'm sure many of you know what we've been doing on plan reviews and permits for water wells as far as continued sanitary protection is that so when we permit we want to make sure the distance from sewer treatment plants, sewer mains, storm sewers, all those things are within the appropriate distance, but required 50 foot radius of ownership and then a 100 foot radius of control meaning outside that 50 foot radius could be servitude or some other type of

thing. I think that's something that we should meld into here so that engineers and all have that on the front end. We were trying to find a happy medium I think.

GREG GORDON: I know one system in our area had that issue, especially when you're under sanitary survey and trying to do your secondary well. I agree we need to go through some of these permeations because the company was trying to do they had 98 feet, that wasn't enough. So they went in and got the extra 2 feet, a 100 feet. But then past that there was a property line with empty property and they couldn't get an easement and it got rejected because the potential that someone may put a septic system on that piece of property right after the 100 foot radius. They couldn't get the person to relinquish it or anything. That company is going through their best efforts to put in a secondary well site.

JAKE CAUSEY: It only has to be a 100 feet away. If you own up to a 100 feet away then beyond that somebody puts in a sewer plant wouldn't be a violation of the code.

RUSTY REEVES: But if they only own a 100 foot. Put the well in the middle it was 50 from each property line.

GREG GORDON: The way it was explained to me, there it is, I got my 100 feet, it's the piece of property right next to it. I can't get any control on that. Because there's an unknown as to what's going to happen and there's no central sewage there.

JAKE CAUSEY: If you have a 100 foot radius like that's the distance you can put a treatment plant a 101 feet away from a public supply well to meet the code. If they own a 100 foot radius then beyond that should not be an issue. If it is, let me know and we will address that.

CHRIS RICHARD: If someone has a well in that situation and worried about a waste water plant they have to come to you for a permit. When y'all are reviewing the plans on the location do y'all look at location to wells to prevent someone from

constructing?

JAKE CAUSEY: Yeah, we try to. A lot of them are going to be individual sewage plants that go to the health unit. They may or may not know where a water well is. The guy installing a plant may not know where a water well is. Really typically more relevant to individual sewage. As well as other things people build a shed and stick God knows what right next to well sites. That's the policy that we've been permitting under a 50 foot radius ownership by some feet. If you have 98 feet I think we can live with that.

CHRIS RICHARD: If you're up against a highway that has a 100 foot right of way then you can use that with the right away as part of your distance.

JAKE CAUSEY: In certain places the right of way, yeah.

CHRIS RICHARD: On 3.2.4 10 D we're back to that 100 year flood and the level of highest flood of record on the well casing. Again, the highest known flood elevation.

RANDY HOLLIS: We're saying 3 feet here, do we standardize on 3 or 2?

CHRIS RICHARD: Everywhere else it's 1.

RANDY HOLLIS: The same above the 100 year flood elevation.

CHRIS RICHARD: I think we should and take out the highest known flood of record.

JAKE CAUSEY: I am trying to remember the casing has to be 12 inches above the ground, but with respect to the 100 year flood.

RANDY HOLLIS: One of my questions, where are we going to put into this, or is it specified somewhere, about minimum distances to wet wells, or manholes, or to storm water? All those requirements we have to meet I don't see it in here. You're talking about adding all those in here?

JAKE CAUSEY: Yeah, I think they were referenced in the subcommittee report in a particular section.

RANDY HOLLIS: In another part of the Louisiana administrative code?

PATRICK KERR: State sanitary code already. There is a table of distances.

RANDY HOLLIS: And so that will still apply?

CHRIS RICHARD: It will all be incorporated as one document.

RANDY HOLLIS: That's what I thought we were going to bring it in. On the next review we can have that table.

JAKE CAUSEY: This was just the initial subcommittee report. When we get to that it will be in there.

RANDY HOLLIS: I guess one of the things I'm going to ask is for a full depth grouted well that's 2000 feet deep do we have to be X distance away from a storm drain or manhole because we're 2000 feet fully grouted. There's no way. Can we see some relaxing on some of these firm requirements of storm drains and manholes?

JAKE CAUSEY: I don't see any point to put them closer. I don't know why we would want to put them closer to the well for any purpose. Regardless of routing, I wouldn't want to put it closer to the well. I'm good with what we've got. I wouldn't want to relax it.

CHRIS RICHARD: Compare with DNR standards to make sure we're not conflicting.

JAKE CAUSEY: That was kind of a whole joint thing with DOTD many years ago. It will be incorporated.

PATRICK KERR: So you'll take this and look at the department's comments next, correct?

J.T. LANE: Yes. Questions or comments on 3? Great job Greg, thank you. Laurie has given y'all an updated part of subchapter 9 with the four last changes we made. Page 2 of 7 deleted second sentence 9.3 D. And on page 4 of 7 the top of the page 9.4.3 at the end inserted DEQ required. And then on page 7 of 7 at the end of the last sentence 9.7 and the last sentence of 9.8 we edited that approval shall be obtained

from LDEQ prior to disposal of all radioactive wastes required and 9.8 all arsenic residual wastes required. The four last changes. Robert moves that we accept as modified.

PATRICK KERR: One more very minor one, but I think it's LPDES elimination system on page 3 of 7. No biggie, but it says LPDS on 9.4.1.

J.T. LANE: LPDES. The great people that have sat with us half the morning and most the afternoon do y'all have any comments on 7 or 9 y'all want to share before we vote? With that do I have a motion to approve subchapter 9 with the extras?

CHRIS RICHARD: One more correction on 9.5.4 just change NPDES and anywhere else to LPDES.

J.T. LANE: A motion to approve subchapter 9 waste residuals with those letter changes? Robert moves, Keith seconds. Any objections? All right, awesome. One last chance for any other public comments before we adjourn. Sheree gave you all a copy of the document for construction of water main extension so if you want to take a look at that. We can discuss it and have an analysis at our next meeting. Any or questions or comments? Thank you.