

Water Meeting

6/17/15

J.T. LANE: All right, good afternoon everyone. I think we'll get started with roll call.

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

J.T. LANE: Well, thank you all for being here today. Especially as session has ended I know for us when session ends that's usually when the summer vacation season starts and I'm sure many of you are also either on that schedule or about to be on it so thanks for making the time. With that while we don't have a long agenda, I think some of the agenda items may take a little time today. I'll move into the approval of the minutes from the last meeting. Does anyone have any questions about them? And do I have a motion to approve them?

PATRICK KERR: Motion.

ROBERT BROU: Second.

J.T. LANE: Any objections? All right, minutes are approved. With that I thought we would move into, after I went through the minutes and had some discussion with Sheree and Dr. Guidry about the last meeting I know there was a lot of discussion around the grandfathering clause and how y'all would like to move into that process. And so there's a couple of I guess approaches we could take that I wanted to discuss and if y'all have others. And then just kind of decide today how we would like to start that work. One obviously would be that we wait till we're done with everything, all the parts and then have a discussion then about grandfathering so we know a 100 percent of the material we're working with, but also that we could also start examining at the next meeting all of the stuff that we have, all of the parts that we have approved. So it's one of two different ways to handle it. And also I think this is one of those things too that could work either way where we discuss all the grandfathering provisions together as a committee as oppose to taking the subcommittee route like we did with the other parts because I think everyone has a tremendous amount to add to that. Or we could again establish a subcommittee to start the work on the parts that are approved thus far. I guess one is an issue of timing as when to start it and do we want to start adding an ongoing

agenda item until we finish to our regular meeting to make some time to discuss the grandfathering section. And so I think either approach has merits and possibly some drawbacks, but that's my thoughts on it. Dr. Guidry, I don't know if there's anything else you want to add about it.

JIMMY GUIDRY: No, I'm just curious what y'all think.

J.T. LANE: I am too. With that I'll leave it open. Does anybody have any thoughts as to the best way to proceed on that or any reaction as to what I laid out?

JIMMY GUIDRY: No need for it? I'll stir it up.

J.T. LANE: Let's just wait on that. Randy.

RANDY HOLLIS: Always comes back to me. There was some interesting discussion, especially from Chris who's not here, about if something is so critical why grandfather it anyway. That was brought up at one of the previous meetings. I think maybe the best way to approach this is for each one of the committee members to look at what do they believe should be grandfathered. I think from my standpoint when I look at some of our treatment plants I have a single wet well. We talked about in those provisions new design will be a divided wet well so you can take one side down and not the other. That single wet well that we have has been there since 1940. It's worked. We know how to work the plant with that so from that

standpoint those are some things that I would like to see grandfathered that someone doesn't come in in a sanitary and say well the new provisions say you have to have two wet wells. And so I think if each one of us would list our pet-peeves first, then we could have a list that we could start from and then as a discussion as a group discuss each one of these points.

J.T. LANE: I agree. We could probably develop a template for everyone to complete that could go from what has been approved thus far and then we'll update it as we approve other parts. And then we will just make a comprehensive list and then start setting aside meeting time for each future meeting to start going through that, dwindling it down until our last few meetings may be just that we finish up the list on the grandfathering clause. The one thing we do is develop a template for everyone to start populating with their, as you said pet peeves, some things that are causing heartburn and then we'll start again discussing that as a committee. I personally think the community discussion is best because I think having a subcommittee won't be as effective as it would have been going through each part. Does anybody have any objections with that approach? Number one we'll provide a template to all of you to start and going through all of the approved parts thus far to say this is what you think we

should discuss for the grandfathering part that will go into the new code. And then as we develop the agendas for the ongoing meetings up until we approve the final part we'll try to devote some time for each meeting here after to discuss that list until we work through it and then the final couple of meetings I think will be to wrap up that discussion.

PATRICK KERR: I thought we had gone through this a few times and decided there were only going to be specific new design criteria which will have to be met retroactively. That the general consensus is that that which has been permitted and is operating to date is okay. It sounds like we're going back to the other side of this which is we're going to list what's allowed be grandfathered. I wish Chris were here cause I think he would be losing hair right now. I don't understand why we want to go back to the list of things that we're going to grandfather instead of a list of things that are critical to public health today. I thought that's where we were.

KEITH SHACKELFORD: That was my understanding too. I think if we try to come up with a comprehensive list it's going to be so unwieldy it will be almost impossible actually for y'all to enforce rather than maybe use the discussion and a list of these things to come up with overall concepts of what has to be done like you were just saying.

And policy more as opposed to a list of items to be regulated, or grandfathered, or not grandfathered.

PATRICK KERR: If what you have is making good water and meeting primary drinking water standards why should committee have to spend the money to change those to bring them into compliance with current requirements.

KEITH SHACKELFORD: All that being said still having the discussion and everybody's particular concerns about ideas of what they think is critical I think is valuable and necessary.

PATRICK KERR: I agree.

J.T. LANE: I think that's one approach, but we have had discussions also there's been many items we have discussed over all of our meetings that we said we'll discuss that at the grandfathering clause discussion so.

PATRICK KERR: I had the distinct impression that Dr. Guidry was more an advocate for not having an extensive list of grandfathered things.

J.T. LANE: I understand that. I think that still may be accurate, but we still need to, I want to know even if the list, I don't know how long the list will be, but I still think that each of you should provide your prospective on what we need to discuss so we can have a discussion about it and say we either agree, disagree on what should or shouldn't be on it. I don't want it to be an overrun list

or anything like that but. Do you want to add to that?

JIMMY GUIDRY: I really would like it to be simple and I don't know how we make it simple because we've said everything that we're writing into the code is what we're going to use for new plants going forward. There's not a whole lot of those when you look at new plants. There's a lot of remodeling, a lot of refurbishing, replacing. Where do we draw the line, where do you make them come into code. Now what we've done on other things in the past is that if somebody had a significant renovation, define what significant is, then you have to come up to code. Cause I don't know if the code requires say a certain size pipe. You're connecting to an old system who doesn't meet the code are you going to get them to replace all the pipes, probably not. But you're going to get everything going forward to meet the code. And so that's where grandfathering an old system that starts trying to remodel or replace at what point do you say you have to meet code. To me we have to clarify something that has been permitted years ago, but I don't know if we have proof all the time that we have permits. I'm not sure we have proof of what was permitted.

PATRICK KERR: We have a litany of inspections that have been conducted and we have test results for water quality and we have systems compliance and violation records. We

all know there's things in the ground that were never permitted, permits where never applied for. There's no doubt, but if it's been inspected a half a dozen times every few years and found to be in compliance I don't think we need to rely on the fact that I can't find a permit.

JIMMY GUIDRY: What gives me comfort, and I told you what gives me comfort is that our answer should be how well is the plant working the fact that we have increased the amount of chlorination, the fact that we increased the amount of tests done gives me comfort that we have a way to measure how well the well is working. Because we've done all this if I'm going to grandfather stuff in it's going to be contingent on the fact that they are still meeting the requirements. That gives me some comfort. Now if they lose pressure because they have some issues and they got to come and do major renovation there ought to be a point where we have to review does it make sense to improve the system as opposed to saying we're here adding an item we can live with what you have. At some point if they are not making, the water is not safe to drink hey all bets are off. We have to do what we have to do to fix it. And if we're going to do significant requirements to fix it then that ought to be up to code at that point in time. I do think it helps to see what the

heartburn is. I don't want to create more work for people. I would really like to know what are the things that absolutely have given people heartburn so we're still going to have to address those regardless in our surveys.

J.T. LANE: It would help us make policy whenever we start over cause we kind of look at this as our re-launch. When we're going to start enforcement after this process we know what to be looking for. The staff, properly train them so they know what to be looking for so we don't have, so we can make the enforcement I think and the inspections more uniform. Which hopefully would lead to less, y'all or other stakeholders having to call us and say hey we thought this was this way or that. It certainly would help educate us I think.

JIMMY GUIDRY: I value the fact that there's this back and forth because there's uncomfortableness saying you keep what you have, it's 40 years old, it's working, but we don't really know other than the test results. That's really what we know. So again, when they submit plans to add something and we review it there's some things we could probably bring up to code. Be a defining line if you're going to spend a few dollars to come up to code, and we determine what that is, when it's a major cost that's where we should weigh in. If it's new that's pretty easy. You're going to meet code. If it's old

there should be a dollar cost that says we're going to require that you put in covers over these tanks and it's going to cost millions of dollars we really need to weigh does it make sense to do that from a safety standpoint, from a health standpoint, from a cost standpoint for return on investment. But I do agree with you, there's probably so many items out there that give people heartburn that that list is quite lengthy because their plant doesn't meet it. And it doesn't meet, to me we're trying to meet federal requirements at a minimum and then there are state requirements. And right now we're working on what our code's going to look like. A blanket grandfather clause we need to define what is protected. I still want to retain if there's major renovation they have to come up to code as much as possible. If they're not doing a whole lot and the water is testing good I can live with it. But again, I don't know how we define that clearly for people. Most of what we review and what I gather from all these discussions is fixing things up, replacing stuff, repairing stuff. Unless I'm wrong, I don't see a whole lot of new plants coming up. Although that day may come where we're going to have to replace plants. But going forward no doubt we want people that are new, new plants up to code. Old plants really don't want to spend a fortune which is not going to get them any

better water than they have today. I don't disagree with the theory, just having a hard time drawing a line and saying we're not going to look at anything other than what's new. We have to look.

J.T. LANE: Probably need to get a full understanding of what are the issues so we can say there may be a few exceptions.

PATRICK KERR: I think when you walk in to do a sanitary survey and never having done one, but having walked into plants thinking about doing our own sanitary survey, figure out what we're going to have to do to satisfy these guys. General cleanliness, operating in accordance with the way it was designed it's very apparent, very apparent. Dive in there to figure out what kind of underdrain you got in a filter bed we need to look at that. That's the kind of thing I say no, it's operating the way it was designed when it was designed, it's producing good water that should be the test. Shipping paint, things like that if it's over a clear well probably not a good thing. If it's on tank somewhere, probably not DHH's concern. But that's the kind of thing that I think it's apparent what that plant looked like when it was built and how it should be operated to me. And that's what y'all should be enforcing that we continue to operate that way.

JIMMY GUIDRY: Would it make sense because really what

people pay attention to, would it make sense to look at what needs to be grandfathered in on the survey itself, just the survey. Is that what the heartburn is that people they don't like what they're reported for, what they're cited for?

PATRICK KERR: I think what we don't like is the fact that the survey is not a survey of an as-built facility. I think it should be as the facility was built. If there are some specific changes that need to be made to bring you into compliance with current primary drinking water standards that's part of the survey too. But otherwise your look at that plant should be what do I think this plant looked like when it was built 50 years ago.

J.T. LANE: I think that's accurate. We have identified that as a clear issue and breakdown between the build and new policy. Their checklist was not, was developed based on what the standards were today as opposed to how it was permitted at the time. I think that's what led to a lot of the concern and frankly frustration and anger about it. I think that is accurate and part of that is I guess what we want to try to work through and I think it's a good place to start.

PATRICK KERR: I think you guys are spot on with what you've done, I don't think the .5 residual, but I like the changes that were made and the strength of the sampling

program that's required now monthly. I think those are great changes. They're making us do what we should have been doing. And that's the kind of stuff I think that we should be spending our time and money on.

JIMMY GUIDRY: Again, I'm just trying to look at how do we address all the concerns and pushback. And I can't fix them all, but I can certainly fix the real big ones. To me the survey is a biggy. I don't know if review of plans is a biggy, y'all tell me. On a new one it shouldn't be. On an old one it might be, I don't really know. I get a sense it's really the citations and our rules that EPA, that meeting the requirements of no bacr or whatever chemicals. That's where I see people getting a lot of heartburn. They keep tightening up on the level, they keep tightening up on the number of things we look for. But again, we don't have a choice with federal regulation. We do have a choice with state regulation. I think we are getting closer, but to me you have to have something to work from. If I went down a list and I said it doesn't make sense to grandfather this in because it's crucial to health. But again, it's an older plant and it would cost you 10 million dollars to do it it doesn't make any sense. Nobody is getting sick from it and it's working as well as we can hope it to be. I guess I'm trying to get a sense of how big of a list it is that's giving the heartburn.

And to me it's people getting cited for stuff they can't fix without a lot of investment. So we can approach it from trying to work on language that covers what we're talking about here, but it would still help to have a list of those things that are on a survey that we shouldn't be looking at in a 30 year old plant. That would help me. Wouldn't matter to look at it anyway.

J.T. LANE: Would it help if we try to, send you the current survey instruments and also use the parts that we've approved thus far as well as a guide and then y'all just sort of list out on a template we can make those issues. And then we can talk about them in sequence and figure out how to, eventually I think once we start the discussion and handle a few of the issues it might, couple of trends might start to come up and might help solve the problems more quickly than we think.

JIMMY GUIDRY: I'll share with you a personal experience, not on this, but the way we do things today from a regulatory standpoint. It's no longer acceptable to have Freon in your air conditioner. Therefore if you replace your air conditioner or try to fix it that's one thing. You try to replace it you can't replace just the one in the house you have to replace the one outside because they don't work together. If you have to replace something on an old plant it's new and doesn't quite work with the old

permit that becomes a problem. And I don't know how often that happens, but I know what I just experienced is very expensive to replace the entire system because it's no longer acceptable to have that gas. Or it made a lot of sense when we had the discussion about the aqueous verses the gaseous. If there's a safer way and it's not more expensive why aren't we using the safer way. Common sense. But again, I think we're learning a lot about systems as a result of this amoeba simply because we live in a southern state seems to be chloramines have their issues and chlorine has its issues in Louisiana. I guess I'm looking for the experts to help me figure out when we go through a survey what are critical elements and what are the things that are really not necessary.

GREG GORDON: Dr. Guidry on one hand too I think all the discussion has been good. The one thing about surveys too this group will still be around. We're going to have to see the implementation of this and how it's done and how those surveys are conducted. We might have to get into the weeds a little bit for a while, but one of the big things I think for this group will also be the implementation of this standard that we've worked so hard to develop. In that later on down the line I think the way I look at it also I hear from you something on a day to day basis you need something finite, but there will be

all of us looking at things as time goes on and I say this to ease your concern because it will be a little bit of a fluid situation in having to look at how these surveys are done so we'll all come to an understanding in six months of implementation, a year down the line of implementation how these surveys and what are being looked at. And that will be a big thing to look back at the grandfather clause and say what can now maybe be dwindled down even more or how can it be changed based upon how all this has been implemented a year, two years worth of time.

J.T. LANE: With that we'll send those documents and we'll work on that.

JIMMY GUIDRY: When we come to your plants you know what we're looking for before we get there?

PATRICK KERR: Absolutely, usually.

JIMMY GUIDRY: Cited on.

GREG GORDON: Yeah, we know what you're looking for and I think Pat brought up a good thing, looks nice, everything is operational, it's not completely all the things we've looked at in the past and we look at our past records, surveys, and what y'all are looking for.

JIMMY GUIDRY: I'm afraid of the slide where water's good, we don't have to do that, we don't have to fix that we're grandfathered and we all do it. Letting things slide, not fixing things, letting things slide because water's still

good, don't want to spend the money. At some point you got to start pointing out this needs some work, this needs to be addressed.

GREG GORDON: The one thing I would say I go out in the field with my staff you hear it from the operators and I hear it from my utility employees we got to take care of this, we need to fix this, I'm a professional, I have certifications, I have a connection with these customers, I go out and talk with them on a daily basis when they have a complaint. There's a certain amount of professional pride among all of our staff and employees that those systems be running properly. And they look at it themselves and think if you're not taking care of this what do you think about me and my profession and your connection with the customers. In terms of what you're worried about I think the people that work on them every day that's what I hear more than anybody is the staff to say we need to take care of these things, we want things operating properly cause it's a reflection of the personal and professional reflection upon them.

JIMMY GUIDRY: And they get frustrated when somebody says we don't have the budget?

GREG GORDON: They can be, yeah. But if they see you're doing things, cleaning out tanks, repainting them, take care of issues, not letting something slide after they've

told you for the tenth time.

RANDY HOLLIS: Let me give you one hard example so we can think about this because it's not going to be easy. On the sanitary survey, and DHH does their job, because it's written in black and white all casings must be 12 inches above the ground for water wells. You have to have 12 inches. There are two incidents that I know of where the casing was 11 inches and 11 1/2 inches above the ground and the systems were written up because it wasn't 12 inches. The cost to repair that, to extend that casing up is astronomical. And yet is 11 1/2 inches or 11 inches acceptable if you're above the BFE if you've got good drainage in the area you'll never have an issue. But they're doing their job because it's not 12 inches. As we get into this and we talk about specifics it's not as easy as saying that's no problem because is 6 inches acceptable, is 4 inches. We're going to get into this. And you have to have a black and white line here because as your people come out they need a check list. It's not going to be easy as we get into some of these things and the casing height is the perfect example. You just don't extend the casing up that easily at all.

J.T. LANE: We normally save public comments till the end, but if you would like to offer please.

ROBERT GILLBRIDE: I just have one request. I will get

into the rest at the end. I would ask that the committee look at the difference between community and non community systems as you're implementing these rules and regulations cause a lot of this stuff that you're implementing are going to hurt small businesses or now hurting small businesses and potentially stop small businesses from opening on some of the stuff. But as y'all are having this discussion here y'all keep that in mind. There is a huge difference between community and non community systems.

J.T. LANE: Thank you. With that we have our check list. With that we'll move on to part 5, Randy.

RANDY HOLLIS: I only have five comments. This is going to go pretty quick. The first comment I have is we have a lot of comment from industry about those that produce chlorine or other chemicals and they use those chemicals for their own water treatment. And so we've not really addressed that in any of this part 5 about should we waive specific requirements for industry when they produce it and they use it within their own plants. And I bring that up mostly as a benefit, Will's been here most every meeting and you brought it up at Dow Chemical because they make chlorine and they use that chlorine in their potable water treatment. And to try and make every provision of this applicable to Dow Chemical in my opinion is really

not fair, but we haven't addressed that. I don't know if we want to address it now.

JAKE CAUSEY: We've had some sort of ongoing discussions with Dow as well. My general appreciation is that there's really only one major issue and it was with storage of chlorine gas.

PATRICK KERR: Transmission, they pipe it through the facility.

JAKE CAUSEY: I don't think there's any conflicts with that, none that I'm aware of.

PATRICK KERR: We were talking about a vacuum feed only would be allowed. And that's a problem for them. They use pressure liquid distribution.

JAKE CAUSEY: Oh, with what's proposed. Still gets back to the storage. That's where the only vacuum is listed in that specific section.

RANDY HOLLIS: Should they be required to store 150 ton cylinders and pulling it off of their major process. I don't know if we want to cover that in some general comment.

JAKE CAUSEY: So I guess I just have a question more than anything. Initially my thought was that this exception that we've made would meet their needs and satisfy their issues. There may be one issue with respect to the pressure verses vacuum line in E of that section. So

maybe that's something we would need to address for them. But there is a provision that it could be stored outside. Still has to be protected from direct sunlight. I don't think there's ever been a desire not to store it in an area protected from direct sunlight.

PATRICK KERR: Theirs are stored in open to the atmosphere vessels much larger than a one ton container. Couldn't we make exceptions. They told me they had several hundred thousand pounds of chlorine stored.

WILL: We have bulk storage that feeds our potable treatment system, but then we have secondary cylinders. And our concern is the secondary cylinders because again it goes back to the risk question why are we worried about 150 pound cylinders, when we have a million pounds right next door. It's low impact, low risk. We've never had any issues. That's what our concern is.

RANDY HOLLIS: I think we've addressed that Will and like Jake said the storage now can be outside as long as it's covered, protected and everything so we're not requiring enclosed buildings. So that would apply for your secondary storage as well. In fact we don't even require weighting scales on backup systems anymore. I guess we have you covered then pretty much.

WILL: I'll have to double check it again. Last time I think we were getting close to being comfortable with it.

RANDY HOLLIS: Skip on to number two. Page five of the proposed regulations, paragraph 5.1.10 H. We put in here that each liquid storage tank shall be provided with a valved drain. If you have secondary containment around those liquid storage tanks you're penetrating both tanks for that so do we want to make that mandatory that every liquid storage tank shall be provided with a valved drain or make that optional should be provided. Right now it's mandatory, shall be.

PATRICK KERR: What's the purpose of that?

JAKE CAUSEY: The purpose of the drain is to clean and maintain the tank. Makes it extraordinarily difficult.

PATRICK KERR: Sometimes you just pump it out like you do a 55 gallon drum.

RANDY HOLLIS: My fluoride tanks I do not have drains at the bottom. I don't want to drain at the bottom of the fluoride tank. They're saturated. I don't want any penetration on the bottom of those things. I don't want anybody to come in and say that's a liquid storage tank you have to have a drain at the bottom of it. You don't want to do that.

PATRICK KERR: What public health purpose does it provide to put a drain in the bottom?

JAKE CAUSEY: The purpose of the drain is to clean and maintain the tanks. That's the extent of it. If you

can't deal with it you got to replace the tank I guess replace it. But then how long are you out of service. So you can quickly service the tank and if there's an issue and get it back in service. I don't think there's anything more profound than that. It's pretty simple. Most tanks I've seen do have drainage. I haven't seen one that did not.

RANDY HOLLIS: Yeah, but most every polyethylene type tank the drain is not on the bottom. The drain is about 2 inches off the bottom because you can't put it on the bottom on some tanks they have a curved bottom. So you're still left with a couple of inches.

JAKE CAUSEY: I don't think it means on the bottom, just near the bottom.

RANDY HOLLIS: I understand, but even on those tanks you can't drain it bone dry. You can get a specially fabricated tank the bottom is sloped toward it and you can drain everything out. Those are expensive, but you can get those. I just bring it up because we left it in there as shall and didn't know if the committee wanted to consider making it should or shall.

PATRICK KERR: Could we just change it to each liquid storage tank will have to be provided with a method of draining it. If we need to take it out of service we're going to pump it out, we're going to neutralize it. Is

that okay with you?

JAKE CAUSEY: I don't have heartburn either way. That's all that it is. I think it's pretty straight forward. And I don't know what operators are going to do when they approach a tank that doesn't have a drain in it. They're all going to respond differently.

RANDY HOLLIS: None of our diesel storage tanks underground have a drain. We got to go in and pump them out.

JAKE CAUSEY: So sometimes for systems it causes an outage can they still treat water while they're doing it.

RANDY HOLLIS: We cover that on water quality. They must maintain water quality while they're taking a tank out of service. We covered that in one of the other provisions.

JAKE CAUSEY: They're going to try.

RANDY HOLLIS: We covered that pretty carefully.

JAKE CAUSEY: What I'm saying is because you say they have to do it doesn't mean they'll actually achieve it. Sometimes you got to require they have the tools and the things in place to achieve it. Which is the purpose. It's like say measure how much chemical you feed, but you don't have to put in scales or anything else. Okay, well they're eyeballing it. In their mind they're measuring it, but probably not doing it very well. That's why you have some of these specific requirements. It's just a drain. It doesn't matter to me.

PATRICK KERR: Can we just say a method?

RANDY HOLLIS: I like that. Shall be provided with a method to be drained which could be a siphon.

ROBERT GILLBRIDE: For clarification this is on bulk storage, right?

PATRICK KERR: Uh-huh.

RANDY HOLLIS: With a method to be drained. Next one, number three. Day tanks, still back on my soapbox on day tanks. They have given you a copy of this. It's a calculation, what I did I went through and looked at we've got theoretical a 1,000 gallons a minute, 4 parts per million dosage and your product concentration is 10,000 parts per million. Gallons to the product to be fed a day is 576 gallons a day, 24 gallons an hour. Day tanks if you've got 30 hours of storage would have to be 720 gallons. We've since changed that to 10 hours so that it would only be 240 gallons and 30 days, no that is 30 hours. Ten days of storage would drop that back to 5700 and 60 gallons. If we looked at a positive displacement pump and this is a diaphragm type pump, an LMI pump. A lot of us are familiar with LMI pumps, also disposable pumps. But they operate with a stroke and a frequency. I would have selected an LMIC78 pump for this which has a maximum output of 25 gallons per hour. That gives you a dosage of 4.16. You physically can't get that pump to

pump anymore. It is physically restrained because of the stroke and the frequency. You're not going anymore than that. The minimum output is only .025 gallons per hour. And that is a true linear relationship with that particular pump from minimum to maximum. It's the maximum output of that pump that's going to prevent an overfeed. It's not the size of the day tank. I would suggest we do this on fluoride systems that you can use a flow signal in addition to the control signal. We got both of those, it takes both of those in series to start and stop a pump. That's going to help insure that the product will only be fed when the controls require a pump to be running and verification the flow is in the main line. The fluoride part I looked at interestingly doesn't really require a flow signal as much as a flow rate. You can use a flow sensor or a pressure sensor, either one, and that can be your second permissive signal. You don't have to have a flow meter. You can use either a vein, or something, or pressure switch. If either one of those signals is not received the pump would not run. In my professional opinion, in professional opinion that is much better protection for the public than a day tank overfeed. It is. A day tank I put in here can lead to problems with degradation of the product being fed. Why is that. You have to leave 20 percent of the product in the tank every

day. You got 30 hours of storage, you're only going to use 24. Twenty percent of that product stays in the day tank every day. You're putting new product in, but you have 20 percent of the old. It stays in it, it stays in it. So sodium hypochlorite they don't recommend that. You need to use a 100 percent of it every time. So I go back to and I gave you the information on LMI pump attached. I think this is better than a day tank and I gave the suggested language I recommended on day tanks.

JAKE CAUSEY: I think we were trying to get there and we had some general language. If you have something that provides the same level or greater protection we wouldn't have to use the day tank. And so this is helpful. And so one thing I mentioned to Randy right before the meeting is an issue. New Orleans had with the fluoride, and this is what I kept going back to because they use positive displacement diaphragm pump with interval checks and suction discharge and they had a failure of the motor speed controller on the pump that caused an overfeed. Randy indicated these LMI pumps don't have that, that's not an issue. So my question was we're saying positive displacement pumps, we're not saying positive displacement pumps that are just like the one you just mentioned. I'm definitely good with the concept, I just want to make sure that we're doing exactly that and that it's not leaving

these other vulnerabilities out there.

RANDY HOLLIS: Here's the difference, the LMI pumps can come with a variable speed control on it and they do so you can pace with the LMI pumps based on the flow. The trick to this is when I went to this calculation I didn't pick a pump that pumps a 100 gallons per hour and say okay I'm going to limit it to 25 with my variable speed control. That's what New Orleans obviously did. They've got a pump that can pump a lot more product into the line than what you need. And so if you screw, if your electronic controls screw up, yeah you can pump more. By picking the pump that I did, and this is engineering design, by picking this pump even if things go haywire that pump physically cannot pump anymore than 25 gallons per hour. It really involves the pump selection.

KEITH SHACKELFORD: Going to that and we don't need to get into engineering design into the details, but historically many engineers you don't want to pick a pump that has to operate at a 100 percent capacity to satisfy your chemical feed demand. They wear out much faster. You pick one that's common, you pick one that's going to operate at it's designed feed rate, but it's only at 50 or 75 percent capacity. They last much longer. That goes to the benefit of your client so they don't have to replace them and that doesn't solve this problem.

RANDY HOLLIS: Yes, it does. I intentionally picked 4 PPM which is the MCL for chlorine. If this pump screws up you're not going to go anymore than 4 PPM. You're going to operate at about 2 or 2 1/2. This particular pump would be operating at 50 percent of its capacity most of the time. What I picked was intentional of I'm not going to exceed the MCL for chlorine by doing this. I understand what you're saying, but that's part of looking at the pump to make sure the engineer if it screws up does not exceed something.

PATRICK KERR: And if you have an application where for your stated reasons you want to use a pump at 50 percent that could exceed the MCL maybe we need a day tank. If that's not an application that you can use this provision for. I will say that you're going to exceed the MCL for 30 hours or 15 hours if you're twice overfeeding cause Murphy says it's going to happen when the operator turns the light switch off and walks out the door. We're still going to overfeed whatever the chemical is until the day tank is empty in 15 hours if we're double feeding. It doesn't prevent that. This actually prevents the overfeed from happening at all. It's a better mouse trap.

JIMMY HAGAN: I agree with Randy, but in my world, the little water systems, when their pumps fail, the ones that I might have designed or their engineer, well a lot of

times they go to get another pump and they don't necessarily get the pump that was originally put in. It could be smaller, it could be larger, it could be anything.

RANDY HOLLIS: And they just violated the state standard because they can't do that without going back to DHH.

JIMMY HAGAN: It goes in as this and they order one, the pump expert comes out, and they get something that's much larger. And this things working better, it's pumping more. And then some cases they get one that doesn't work at all and we look at the tank it's been in there for 6 months and hasn't pumped anything in there. Where did you get the pump.

PATRICK KERR: How does a day tank fix that? How do we fix stupid?

JIMMY HAGAN: You can only pump out what's in there, just at a higher rate for a very short time period. They should know in looking at it that hey what's in here is disappearing in 6 hours instead of 24 hours or something like that. How do you keep that from happening, I wish I could tell you it doesn't happen, but in fact it does because we get calls at places all the time the same situation. We're not saying the day tank is the ultimate solution, it's that people do get pumps that are not engineered for that particular application or incorrectly

sized.

DIRK BARRIOS: On a different note about day tanks some of the products if we would have to put every product that we used in a day tank talking about safety for the employees and all, very hazardous. And one of them that we use to make chlorine dioxide is sulfuric acid 78 percent. You get one drop of sulfuric acid on your skin you're not wiping it off, it's eating away.

JAKE CAUSEY: You're not feeding that directly?

DIRK BARRIOS: Mixing it in a generator. You're telling us no matter what we have to have a day tank, I'm just saying.

JAKE CAUSEY: No, we're talking about chemicals that are fed directly into the water system.

ROBERT BROU: It doesn't actually define that.

DIRK BARRIOS: It goes through a generator and the generator use to purate and 78 percent sulfuric acid to make chlorine dioxide.

ROBERT BROU: Using the exact same system.

JAKE CAUSEY: Frankly that goes back to the exception we had put in there. Eva Thorton had emailed me several configurations with chlorine dioxide and making sure there's not an overfeed. Analyzers or some sensors and switches and what have you that frankly cost more than a day tank, but they provided a greater level of protection.

Which I said yeah that makes sense. Goes back to the exact exception that we had posed to the code as it is. I don't know, something like Randy is talking about I think requires a special permit or approval of sorts. You're talking about on surveys having to go check every LMI pump, is this the right make and model.

DIRK BARRIOS: So if I change the day tank and I don't use the right size day tank, but the guy doesn't know you might be better off. Let me play devil's advocate. Supposed to be 100 gallon day tank, day tank after so many years you have to replace it. So they go to buy a 100 gallon day tank, but they couldn't get a 100 gallon day tank so they get a 120 gallon or 150 gallon. They put it in the same place you're not going to tell the difference when you come back. Like Pat you can't regulate stupid. People are going to make those types of changes. People are going to do it. They are going to do it and it will look good. You're not going to be able to distinguish between a 100 gallon 150 unless you have it when you go out there and look at it that that close.

PATRICK KERR: We have a universal exception to what you're trying to do with day tanks Jake at this table. There's you on one side and I think there's everybody else on the other. We got to get it fixed. We have to stop fighting about day tanks and figure out how to engineer a solution,

please. Am I misspeaking?

JIMMY GUIDRY: I'm going to ask this question. We talk about grandfathering stuff in. Day tanks, have they been around forever?

PATRICK KERR: Some people use day tanks and others do not.

JIMMY GUIDRY: What it sounds like to me is that some have used day tanks fine, the water's been fine. Some have used pumps and pumps have been fine. It would really take somebody that knows their stuff to go around and say we changed the day tanks it's the wrong one, we changed the pump it's the wrong one. I know that doesn't happen. But you know who's libel at the end of the day, people that run the system. Like you said, we may not regulate stupid, but if we catch stupid we'll point it out. But if you don't catch stupid you may pay the price. I guess what we're trying to get is that we feel we don't agree on what is a shall. And to me shall is shall not feed too much chemical into the water system. Whatever accomplishes that, that we can show accomplishes that we get where we need to go. It might be the pump, but it sounds to me it has to be the right pump. That makes me nervous. I know for a fact with sewer systems people are constantly trying to find the cheaper pump, not the right pump, the cheaper pump. How do we make sure that we don't feed too much. That's all I care about. Don't feed too

much chemical to people. Not enough, it will show up.

Too much, it will show up, but in something I can't fix.

JAKE CAUSEY: If I'm not mistaken the email proposed just using an analyzer at the point of entry. If you measure how much you're putting out there then that's how you know stuff.

PATRICK KERR: That's not a solution either. There's some chemicals we're using, TKPP we don't measure that inline. We measure that based on dose and then we control for it. There's just not in line analyzers for everything at the doses we're using.

RANDY HOLLIS: Real-time alarms going from every remote site back to the location in every rural system and they don't have them.

PATRICK KERR: The problem with day tanks we don't visit our plants daily anymore.

DIRK BARRIOS: And that's my problem, we visit our plants every day 24 hours a day 7 days a week. And you're trying to pass rules that's going to regulate them, but affects us and we're there all the time and y'all not making that distinction. And that's my heartburn. That's Robbie's heartburn.

JIMMY GUIDRY: What's the solution? I'm hearing Randy's solution which is if you have the right pump that protects you. I'm hearing Jake's solution if you have day tanks

that protects you. I don't think any of it protects you unless you're routinely monitoring stuff to make sure you're not poisoning people which is a high risk. This is a high risk game if you overfeed. I haven't seen it be an issue. Are we trying to fix something that's not an issue?

PATRICK KERR: We've had acute overfeed with some chemicals. We have had some issues with overfeed of chlorine, overfeed of fluoride.

JIMMY GUIDRY: How did you address them? Change your pump, change the day tanks.

PATRICK KERR: Find the problem. Find the problem and fix it.

J.T. LANE: What was the problem? What's typical?

PATRICK KERR: What's a typical problem for overfeed.

JAKE CAUSEY: This was a pump failure in New Orleans with fluoride. If they had a day tank they would not have reached the levels they did because the pump it was more than two times that it was feeding. It doesn't take a whole day, it only takes a couple hours.

PATRICK KERR: Can I make a suggestion? This 5.1.1 shouldn't be day tanks, it should be control of chemical overfeed and just take it from a different tact and allow some engineering solutions and day tanks is one.

JIMMY GUIDRY: I like that.

DIRK BARRIOS: We use it for a lot of chemicals, we just don't use it for certain chemicals because they're hazardous to handle. We use it for fluoride, alum.

JIMMY GUIDRY: Well, it's an argument people make against fluorination. They argue the fact you really don't need it, that it really is a risk, and that it's an extra cost, and you're putting something in your body that doesn't routinely have to be there. If it's done correctly it saves you a ton of disease because it protects your teeth, it protects you against bacteria. If it's done incorrectly it poisons you. The people that are against it say it's a poison, we shouldn't have it in water. The people are for it saying it's great stuff if you control it. So controlling it really is the answer. The more we can assure they're controlled there ought to be in engineering. I think the future is sensors that actually tell you something is wrong. Probably that day is not too far from now. They probably have some now, probably super expensive. If there was a way to monitor it to where you knew what the level was cause it's not something we routinely check. It's not something we routinely know. I do like the idea there may be more than one way to skin a cat. And let the engineers figure out how do you do it. We should protect the public cause that's exactly the argument. Too much of a good thing is a bad thing for

you. I like that.

J.T. LANE: We will work on language that will allow for that flexibility.

JIMMY GUIDRY: Is there a way to explain exactly what pumps protects you. Is there a way to say it without saying a brand name. Is there a way to say protects from overfeed?

RANDY HOLLIS: We always go back to fluoride because it is recognized fluoride can be extremely toxic if you overfeed it. It is a very hazardous chemical and so what was put into 10 state standards and the requirements years ago was two permissives, flow and control. And if you don't get either one of those you cannot feed fluoride. And they recognized that was an acceptable way of feeding chloride is you have two permissives if either one of them doesn't work, and we just had this in Crowley. We got hit by lightning with our flow meter. Because we did not have a flow signal, and we notified DHH, we shut off our fluoride system because we did not have a flow signal. We're back to flow meters now, we're back to feeding fluoride. That's been recognized for years, two permissives is acceptable to feed fluoride. That's what I was suggesting in here for the feed of chemicals. If you have two permissives then you've got your control there that says okay now you can feed your chemical. And that's what I was trying to accomplish with this. I think a properly

designed pump can limit the overfeed better than a day tank. Could an operator come in and change out a pump and put a bigger pump in, absolutely. But that would happen with a day tank also. You can have a day tank and you can put in a bigger pump. So saying that's not going to happen with a day tank is not true. That can happen with a day tank as well.

JIMMY GUIDRY: I would rather find a way to assure that there's a way of either checking or making sure that we have the right thing in place. And I don't know how you do that because everybody would have to learn more about pumps and everybody would have to know what they're looking at or day tanks. I can accept both, whatever protects you I can accept. But assurance that that's the right one and hadn't been replaced or hadn't been put improper to me sounds like something that may be an educational thing. You go to systems and say don't just replace with any pump, don't just replace with any tank. How do you accomplish that?

RANDY HOLLIS: And that's going to be very difficult as Jimmy knows because they're going to look in the blue book and they're going to say okay here's a pump, here's a cheaper pump, let me order this one. They are going to find something cheaper and it may work.

DIRK BARRIOS: Work to a certain degree.

RANDY HOLLIS: We can't fix every problem like that, but we can write the best regulations so your people have that tool when they go out there.

JIMMY GUIDRY: You think you've come as close as you can get?

RANDY HOLLIS: I think I have. I just don't think a day tank is a solution.

PATRICK KERR: Also consider the chemical and the MCL and what's driving it. A violation of the MCL free chlorine of 4 in the short term is not going to cause a problem for public health. Chronically it will cause a problem. It's a violation and it needs to be reported. However, is it something that's going to hurt the public, no. So in that case do you need to take as strong of a control, probably not. Fluoride, maybe something that you want to take a better look at cause it causes (inaudible) pretty quickly in infant teeth. And so yes you may very well want to look at that. But that's why I think just have a section on control of overfeeds and then have the design engineer satisfy the reviewing engineer that these controls are adequate. Whether it's a day tank or inline monitoring. Moving down that path inline monitoring there's lots of inline chlorine analyzers out there where guys that run a half inch or 3 quarter inch pipe from the sampling point back to the analyzer and it's moving a quarter of a gallon

a minute and we're talking hours if not days until you actually are seeing what you put through it. I would rather spend the time fixing that and making sure we're getting near real-time information than this.

J.T. LANE: Sounds like we can work on some language and get back to all of you for next meeting. Continue with review of part 5 and work with Randy.

RANDY HOLLIS: I suggested language so I would like for Jake to look at that language and talk about it at the next meeting again.

J.T. LANE: Plan at the next meeting to finalize it. We may offer some tweaks or alternatives and then finalize it. Is that okay with everyone?

RANDY HOLLIS: I had two more things. One was a minor thing on page 7 and it was under the protective equipment. 5.3.2 actually respiratory protective equipment. The unit shall use compressed air and have at least a 30 minute capacity. I put the word and in there, just works better.

PATRICK KERR: Should.

RANDY HOLLIS: You don't like that?

PATRICK KERR: Units don't always used compressed air.

They use just over pressurized with blowers now for a lot of these applications. Not wearing a SCBA and handling a lot of these chemicals because you don't have to do fit tests and respiratory surveillance and all that good

stuff. You wear a hood with air blown in from a blower, I guess it's compressed by the blower. But I think you're talking about bottled gas when you say compressed air, right.

RANDY HOLLIS: I think that was the intent here was the SCBAs.

PATRICK KERR: I hadn't even thought about this.

RANDY HOLLIS: The hoods would have compressed air because the blower in the back and those cartridges would have about a 30 minute capacity.

PATRICK KERR: It's not a cartridge, it's an electric blower.

RANDY HOLLIS: But it has cartridges in the pack filtering out the chlorine into the hood.

PATRICK KERR: That would be enough?

RANDY HOLLIS: Yeah, you've met this. That's the hoods we have everywhere.

PATRICK KERR: Compressed airs, that little blower is compressing it up?

RANDY HOLLIS: It is. Differential pressure across it. That's a blower. Number 5 goes back to page 12. Page 12, and this was just to avoid confusion down the road since we've been through the arduous task of everything was under 5.4.5.3 A which is the top one on page 12. Says anhydrous ammonia and storage feed systems shall be

enclosed and separated from other work areas and constructed of corrosion resistant materials. I wanted to put in here just add a sentence that bulk anhydrous storage tanks holding more than 500 gallons shall not be located in an enclosed area. Was that the criteria they set, the Louisiana Gas Commission?

JAKE CAUSEY: Yes.

RANDY HOLLIS: If we put this in here then somebody down the road will understand we've already addressed that. We've complied with LA Gas Commission. Anything over 500 goes outside just so we don't have to go through this again. That was a suggestion to add in there. That's all I got.

DIRK BARRIOS: On page 3 of 14 on 5.1.4 C where it says devices utilized. In a lot of cases we do grab samples. Again, we're manned 24 hours a day 7 days a week. We test our feed rates for some of our chemicals by doing grab samples. How you interpret the word device. I say device or ability. Or method. When you say device to me it's like a mechanical instrument that's actually recording and in some cases we don't always use a device. We actually physically measure constantly throughout the shifts.

JAKE CAUSEY: I just read this to say whatever you use has to be compatible with what they're measuring.

SHEREE TAILLON: Instead of device methods utilized to

readily measure.

PATRICK KERR: What you're using to grab that sample should be able to store chemical.

DIRK BARRIOS: I'm just trying to envision your sanitary coming out there and saying where is your device to measure whatever chemical you're talking about. I'm being literal. To me you're saying device it means something that's actually getting a reading.

J.T. LANE: Why don't we say methods, materials, or equipment and make it or.

DIRK BARRIOS: Something that will allow you to get grab samples.

JAKE CAUSEY: I'm looking at the end of it I think we added previously, if I am not mistaken, and shall be provided. Devices to measure shall be provided.

J.T. LANE: I think that accommodates.

JEFFREY DUPLANTIS: They're not talking about the method here. Right here they're talking about a plastic cup or graduated cylinder.

DIRK BARRIOS: I'm just being literal and I'm saying a guy comes to do a sanitary survey and he's going to say okay you have a device to measure chlorine, you have a device to measure alum. This chemical where is your device. Well, that's not a device. That's all I'm saying. It's a method, I go out there and I grab a sample.

JEFFREY DUPLANTIS: This is not a method. That's a piece of equipment or something.

DIRK BARRIOS: How do you do define the word.

JAKE CAUSEY: You're not literally grabbing it with your hand. You're using something, right.

RANDY HOLLIS: You're saying methods and materials utilized.

JEFFREY DUPLANTIS: This C is not about the method. C is about the equipment. So maybe it's just equipment utilized to readily measure.

J.T. LANE: Devices, equipment, or supplies, or material, something like that.

JIMMY GUIDRY: How about just anything.

JAKE CAUSEY: Equipment is fine.

J.T. LANE: Thank you Randy for all that extra homework you did.

JIMMY GUIDRY: I thought you were just supposed to talk about day tanks.

RANDY HOLLIS: Wait till next meeting. I'll come up with more.

DIRK BARRIOS: I got one more thing on page 8 item 12 D it says secured. I thought about the chlorine cylinder and we use rollers to hold it in place. Which you use the rollers cause if you have a leak so you can rotate it instead of liquid draining out you have gas coming out.

If we have rollers and we have to strap down every one of them it kind of defeats the purpose of being able to get in there and find the manner to take care of the potential leak. Whereas a liquid leak instead of gaseous. Whereas a gaseous leak is going to leak slowly where we have chlorine scrubbers that can pretty much take care of it. But if it's a liquid leak it can get out of hand real quick by the time a guy can get in there and remove a strap that has a strap down. Says secured in a fixed position.

PATRICK KERR: Yeah, but this is for an exception to chlorine rooms. This is if I want to put it in other than a chlorine room I have to do all these things. If I want to store it outside I have to do all these things.

JAKE CAUSEY: It's on the next page. You're more concerned about 9 of page 14. G 3 says restrained in position.

DIRK BARRIOS: I might have marked the wrong sheet.

JAKE CAUSEY: If the cylinders are chlorine gas housed only in chlorine storage rooms or designated areas that conform with the exceptions, isolated from operating areas, restrained in position.

RANDY HOLLIS: You have a chlorine leak somebody's not going in there without full protection and if you have something easy--

DIRK BARRIOS: But if it's a liquid leak it's a whole lot

more volatile than it is a gaseous leak. And if you have it strapped down some kind of way you're going to have to take that strap off. If it's a severe enough leak there's going to be a lot of liquid on the ground.

PATRICK KERR: This is talking about strapping it down so it doesn't move. This is on like a vertical cylinder putting chains around it so it doesn't fall over. It doesn't say, it says restrain in position. It's not going to change positions but.

DIRK BARRIOS: I guess our question is are being on those rollers acceptable?

JAKE CAUSEY: Talking about one tons slightly off the ground?

ROBERT BROU: I also have one tons on a rail. There's five of them in a line, three being off to the side. They have chops, but that's not secured.

RANDY HOLLIS: Let me stress this. If we make something so complicated to restrain it, bolts and taking air guns and this stuff the operators will not use it and we know that. But if you do something just put a couple of cleats on both sides of it with a rope and run the rope across the top and you do a cleat that's restrained. And so when you go to change the cylinder undo the cleat, throw the rope off, move the cylinder. It's something that simple that was trying to comply with the concern if you get a

hurricane are they going to float off somewhere. The intent was something simple that would restrain it, but not something that's going to take you 30 minutes to unbolt it. A rope and a couple of cleats you take it off, you rotate it, and you're done.

ROBERT BROU: I do have one more on 8 of 14 under number 12 B shielded from public view. I have a plant and I guess they were probably put there in 1972. They are behind a fence, secured area, manned 24 hours, chlorine alarms. But if you pull up to the gate you're looking right at my chlorine cylinders, probably 40, 50 yards away directly at them. To change that I don't know how I would begin to change that. Build a 20 foot tall wall in front of it. Which would block my generator. I don't know how you fix that.

PATRICK KERR: We went to Home Depot and put a little privacy fence just so somebody with a 30 odd 6 sitting outside your gate isn't going to shoot your chlorine cylinders. It's like stupidity, but it's what Bubba's going to do with a 6 pack, right.

ROBERT BROU: What kind of privacy fence, what are we talking about. I've got slab all the way from my gate all the way to those cylinders.

JAKE CAUSEY: Just so they aren't visible.

ROBERT BROU: There's no place to put fence is what I'm

saying.

PATRICK KERR: I promise you can put something out there.

ROBERT BROU: I will come pick you up and bring you.

PATRICK KERR: You might not like it, but you won't be able to see it. We put up PVC privacy fence well off the area and just so somebody driving down Airline Highway doesn't look over and see there is chlorine sitting there.

ROBERT BROU: This ain't exactly a highway. It's a dead end street that goes almost nowhere, but I'm one of the only occupants on the end of the street. My wastewater department is across the street. There's all of two people who live near it, but absolutely if they pull to the gate you're looking right at it.

RANDY HOLLIS: Relocate your outside ammonia bulk storage tank in front of your chlorine cylinders.

ROBERT BROU: It's not far. It's blocked, it's obscured at least. I'm open to suggestions.

JIMMY GUIDRY: This is a good example, would this be grandfathered?

ROBERT BROU: It certainly isn't affecting water quality. It's been there for 40 something years.

JIMMY GUIDRY: It's a long time, we're not changing anything. All we're addressing is that people out there are crazy nowadays and try to take out a tank.

J.T. LANE: Is anyone else looking at it from a public

safety standpoint too?

ROBERT BROU: It's part of my risk management plan. I have to comply with RMP for EPA. We have a lot of different things that we have to address with that. For hurricanes one of our procedures is we fill up a dump truck full of sand and back it up within a few feet of it so it can't come out of that. It's a three sided building with one opening, but the opening is straight to the street.

J.T. LANE: If there's anything in part 5 you want to run through. Is there anything else in part 5?

JAKE CAUSEY: No, please no.

J.T. LANE: We're going to jump on to part 10. Just say that I know there's a couple issues from the last meeting about the pressure testing and cross connection control that we're still working through a couple of issues on the plumbing code is being finalized with the transition committee. I know Caryn's been sitting on that, on the transition and we made them aware of the pressure testing frequency concern and they went ahead and voted to make it annually instead of every other year. And so what we have done is also besides cross correction asked the AG for an opinion on where there's disagreement or want to do things differently. Where that begins and ends for us because it's still sort of gray for us. I hear you and we did raise that as a concern and as a recommendation.

PATRICK KERR: So the plumbers want to test it every year, that's what they're telling you. I wonder why.

J.T. LANE: We've asked for the AG's opinion on that.

Those two things may be that we discuss we sort of have to wait till they weigh in on that. I wanted you to be aware of that.

PATRICK KERR: I'm curious now that you say that to know how the plumbers are going to interface with public water suppliers cause there is no link. I'm not beholden to any plumbing code requirements other than the fact that OPH had at some point in the past said this is a drinking water requirement.

J.T. LANE: Those were on our list of questions too that the AG opinion was not just related to this. I don't know if David wants to give a quick overview what exactly is in it. We had a letter of the requests was about four or five pages of questions that we had that are going to be effective in January. Related to enforcement and of what we see as some overlap and we just want to be clear of where our authority begins and ends because I certainly don't want to misstep. The legislature made it pretty clear. There's some implementation issues we still need to work through.

JAKE CAUSEY: House bill 1048 last year made it pretty clear we were not in the plumbing business. Like at least

eight different times. Cross connection control is something that definitely kind of is right there in between. Typically containment protection is typically located within the plumbing system. Some water systems, very few, one percent maybe have assemblies where they own it for the customer, but that's the other 99 percent it's always in the customer's plumbing system. Some of that falls with the plumbing so then the question becomes how much of this do we have the authority to do based on the legislation that passed last year. Legislation passed last year specifically says the plumbing code is going to include requirements of cross connection control.

PATRICK KERR: How is the plumbing board going to enforce since they have no authority over drinking water.

JAKE CAUSEY: The code council and the local building official, not the plumbing board.

PATRICK KERR: So other than communities that have code councils to have enforcement authority there will be no cross correction control enforcement?

JAKE CAUSEY: We don't know the answers to any of those questions. Those are the same questions we have. If that's the answer then there is a big problem that we have to fix, frankly. That's just where we're at. We need to know what the answer is so we know if there is a big problem we have to fix. Another one that's come up is

with general testers and the cross connection surveys. I think that's something else. I think there is some folks probably here from the public, been hearing from more and more water systems who had their staff certified as general testers so they could do tests and with the law that changed, and the codes changing we're not going to have general testers anymore. I think those are things water systems are probably, I know a lot of them want so it's probably something we're going to try to I guess work with them to achieve. Likely something that may also require legislation.

DIRK BARRIOS: Where do we proceed from here. If you ask us if you're a customer of ours and we deem that you're an at risk customer and you need a backflow prevention device sounds like to me we can't even make you put it in. How do you make them test it?

PATRICK KERR: You tell them you're not going to have water if you provide water service.

JIMMY GUIDRY: If you want water you have to have this.

JAKE CAUSEY: This is what DHH's authority is, not what your authority is. Those are two very different things.

DIRK BARRIOS: Our mandate is to protect our system. I was thinking if I think you're an at risk customer I'm going to make you put a backflow prevention device and on an annual basis I need test results.

ROBERT BROU: So we can still certify someone as a general tester, we just can't own y'all certification. Cause in the past we just referred them to y'all, to the plumbing code website.

PATRICK KERR: It's your rules, you can certify anybody you want.

MITCH LABAS: Right now I think what Jake is saying is pretty accurate. The general testing won't exist in essence. And there's a lot of water systems that have sent people and gotten them blessed to go in and take care of and it and according to the new reg.

DIRK BARRIOS: Only if we own the system.

J.T. LANE: Please identify yourself.

MITCH LABAS: Mitch LaBas with Backflow Prevention Services.

JAKE CAUSEY: To answer Robbie's question there are laws and rules that do remain in place that regulate who can install and test and repair backflow preventers and that's plumbers with a WSPS endorsement. I don't know that you can certify your own people to test assemblies that are in a plumbing system. Certainly ones that you own that are part of your community water system, yes. If it's in a plumbing system I think there are other laws and rules that still control that.

DIRK BARRIOS: If we own the backflow prevention device we

can get guys certified to make the repairs and test.

JAKE CAUSEY: Yeah, definitely. That's two major issues.

And again the one on the test was the other. I think we included most of the other language in this. So it's a little more up to date based on the last meeting. But I think there's some questions that we still got to get answered before we know.

PATRICK KERR: Let me ask a question about surveyors.

Since we don't have a surveyor, but if a water system were to have or a community were to have an ordinance or a water system rule requiring backflow prevention that pushes it into the plumbing side you just have to prove you're meeting the plumbing standard, whatever it is come January, continue to have water service. There's nothing wrong with that either. I have a person who I call a surveyor who's gone through the process and is qualified as a surveyor that doesn't mean he has to be covered you say language in January.

JAKE CAUSEY: What I would say from our prospective from promulgating the rule I don't know that I would want to move forward having 1400 water systems determining who would qualify as surveyors or not.

PATRICK KERR: So who do we use?

JAKE CAUSEY: We need a certification program. Just like general testers, we need a certification program.

PATRICK KERR: But if we can't, if the plumbers tell us you can't do it.

JAKE CAUSEY: I don't think it's going to come from the plumbers. I think the plumbing board at the last meeting they were willing to do the certification program for surveyors and general testers. They got to get authority from the legislature. I think that's what the interpretation to me is.

PATRICK KERR: So nobody's got the authority right now, basically.

JIMMY GUIDRY: What's changed here is that the uniform construction code council will now be in charge of plumbers. Plumbers are not happy with that because now they're going to be treated just like everybody else when a developer builds something it's going to come under uniform construction code council who's going to be reviewed by a local inspector who probably won't have the knowledge on the plumbing or anything else. But other states have done this. This is not something that hasn't been done elsewhere. When that's done usually IPC the code that they were going to is amended to address what you are talking about. Right now we're having difficulty by being involved with the transition of getting them to agree how we want to amend. We're trying to amend things to protect health. They are thinking we're in charge now,

you can have your input, but we have final say. So local water companies getting involved and letting their uniform construction code council know we need these things is probably what I would advise because the regulation is going to come from your uniform construction code council. Some of them are strong, some of them aren't very strong. But you're input I'm sure as a community provider of services is going to be heavily looked at as to what protects water. They're not listening to us totally.

JAKE CAUSEY: They didn't want to put a certification program into the plumbing code itself. They didn't feel like that's the way to handle a certification program.

J.T. LANE: It's part of what we've asked the AG to weigh in on because there's a part of the law where it says their authority is clear over ours in terms of the language in the plumbing. So what we've asked for is that what public health issues the way our sanitary code is written actually really trump that. And that's one of the things we've asked the AG to offer so we can clarify this and move forward. We have presented on these issues.

PATRICK KERR: David, could you circulate that so we can weigh in on it?

DAVID MCCAY: Yeah, I can. I can send it to J.T. or Jake.

PATRICK KERR: So we could send letters of support or whatever to the AG.

DAVID MCCAY: Just to let you guys know the opinion request doesn't mention backflow prevention. It gives some other examples. But I drafted it essentially, it just ask the general questions about these two provisions in the act. And the one that says the plumbing code trumps anything DHH does and the other that says, seems to say DHH shall have no role in enforcing the plumbing code. How that affects what we do in terms of and the examples I mentioned were essentially retail food examples. But the general questions I think are the same. I don't know what kind of answer we're going to get. My worry we're going to get some sort of vague wishy-washy answer that's not particularly helpful. And if I had to bet I would bet the answer might be something along those lines. I think maybe, this is just my view, this isn't the department's view or J.T. or Dr. Guidry. Maybe what's needed is possibly a legislative solution. If you guys come up with the approach that you think needs to be taken that somebody approaches the legislature and asks them to enact something that says notwithstanding act 248 or anything therein this shall be allowed.

J.T. LANE: Jake, I know you said the plumbing board or legislation might be required, but they don't currently have on their current authority ability to promulgate rules that would allow them to start a program?

JAKE CAUSEY: To certify, no. Code council doesn't certify anybody currently.

J.T. LANE: The plumbing board.

JAKE CAUSEY: Oh, the plumbing board. No, they don't currently have the authority to do the certification.

PATRICK KERR: So you can't say no plumbing can connect to a public water supply other than through a whatever. You can't put a rule in there about the connection between the plumbing and the public water supply. That's not the department's role?

JIMMY GUIDRY: We can regulate your side, can't regulate the plumbing side.

JAKE CAUSEY: We're not certain now.

PATRICK KERR: I'm not talking about the plumbing side. You cannot connect this to us unless before the first branch there's backflow prevention or cross connection control and you don't think you could.

JAKE CAUSEY: If you read act 836 last year I think you might arrive at that same conclusion.

J.T. LANE: What if we just made a blanket statement like that and pretended. I guess not pretended, but.

JAKE CAUSEY: You can't even think about regulating plumbing.

MITCH LABAS: What Dr. Guidry said earlier is that, and I'm looking at the water system guys here, the responsibility

falls on y'all. That's not news. The cross connection as Jake mentioned is really kind of in a gray area right now and my personal opinion I think that y'all have a significant stake in what's being said. So the legislative issue may be the route to go, or at the topic of discussion at least. Again, what Dr. Guidry said it's all on y'all as water system owners and operators. The cross connection issue is, I'm not going to say hands off on the other side, but there's a lot of knowledge needs to be spread.

JEREMY HARRIS: Just to keep in mind, Jeremy Harris with DHH, in a similar manner you mentioned like would we have the authority to require a backflow before they got service. Another thing that could potentially change is grease traps. So smaller units, more grease getting into municipal systems it's kind of similar. And it seems like it would make sense that a municipality if there's no issues would have the authority to say no you can't discharge into our system unless you put in a bigger grease trap. It's similar.

MITCH LABAS: As Jake was saying a while ago have some stake on who's going to be the surveyors, the testers, the approved general testers. Y'all have guys on staff, may or may not, are looking to get certified to do the testing and it won't happen right now.

PATRICK KERR: We can't test the plumbing device.

MITCH LABAS: But the same thing on the surveyor end of it. Set a standard. Somebody says you're good, I saw you go to a survey class, you were there for an hour or two you're good. That's not a good standard. Establish some kind of standards that should be followed and I think you have the significant stake.

JAKE CAUSEY: I think you're talking about clarify authority for cross connection control water systems, general testers and surveyors so that what's proposed here can rock and roll.

PATRICK KERR: The solution is for the water system providers to own cross connection control devices and that's hugely expensive and unbelievably burdensome. If you can't get legislative relief to allow the customers to provide that protection we got a big problem.

JIMMY GUIDRY: But if you require it to be connected you have a lot of teeth. We see this with electrical, we see this with water. Local government has a lot of authority if they choose to say you will not connect unless you have this. When I buy property or whatever property is I have to meet certain requirements or that property is not functional. I don't have sewage, I don't have water.

PATRICK KERR: Dr. Guidry, the problem we've had as a private utility is that I don't have police power. And

we've fought about this for years with y'all. And so if I can't give you due process as a customer and I'm not allowed to come on your property to inspect it there's not an awful lot I can do cause they can tell me no you can't inspect my plumbing. You're not a plumber.

JIMMY GUIDRY: You can't check to see if they did what you asked before you connect?

PATRICK KERR: I can before they connect, but now how am I going to make you do it every year. It's one of those things that my lawyers tell me you're really going to get yourself in a crack. That's why years ago where I started was Jake can I send you a list of people who haven't provided annual testing results to me and you with police powers and due process order that I shut them off. But now you've lost it too.

MITCH LABAS: The building officials have it and they are the ones who should be enforcing it. They should be talking to you on the local level.

JAKE CAUSEY: I think for the most part it was unintended consequences. This was nothing even discussed. I don't know that there's really any opposition. I don't think anybody else even understands the issue. I think it's just unintended consequences. I think it just went a little bit far. I don't know there would really be opposition per say.

ROBERT BROU: Can we as a committee want to take a position and write a position and send it to our legislators. Get something enacted that at least fixes this problem. Cause I agree with you, probably totally unforeseen, unintended, but it's going to destroy us if we don't get this fixed.

PATRICK KERR: What kind of authority might Dr. Heitmeir's committee have over something like this? It's an interpretation.

J.T. LANE: David, didn't we put in the law that it would be such over-site of health and welfare as well?

DAVID MCCAY: I remember something to that affect. Was that this one?

JAKE CAUSEY: No, act 836.

DAVID MCCAY: I just don't know if that's in here or not.

PATRICK KERR: This is the greatest contribution to public health is getting this cross connection control fixed.

J.T. LANE: It's not a bad idea. The transition committee's work is done pretty much and the council is going to take over and at some point, maybe before legislative session, maybe the position paper should go to them. To council, the construction to get them to reconsider and then maybe the next step would be to ask Senator Heitmeir and Representative Simon for an informational briefing this fall so we can go and brief them on the issues. Cause we can do that. I hate to wait

for a solution until next session.

PATRICK KERR: Put it in the veto session.

J.T. LANE: Does that sound like a good plan? And we can draft a paper and we can circulate it to y'all. Try to approve it by the next meeting and then.

JIMMY GUIDRY: This bill was passed without going through health and welfare. It was passed going to the committee, commerce. It was pushed by the developers. The chair of the commerce committee on the house side is a developer and he got it passed on both sides. He made sure it didn't go through health and welfare because he did not want health to weight in. This was orchestrated, he's not running for office. He has done his term. A lot of things can change by next session. There is an opportunity to weigh in. This will put some things at risk and I do not think a uniform construction code council should be able to determine or will be able to determine something's a health risk or not. They will look at cost, they will look at a developer's investment. They will not look at health with exception of our voice and your voice. Our ability to say hey you can have say over the plumbing code, but not this. I think that goes in law. I don't see how anybody can argue that. You have to protect your water. Start thinking of things they cannot regulate.

PATRICK KERR: Other than that, this looks good Jake.

JAKE CAUSEY: It's only those one or two little things.

J.T. LANE: As far as part 10 goes we know we have some pretty big to dos on that. Is there anything in part 10 otherwise you want to review or look into?

PATRICK KERR: I appreciate your movement and Florida's movement on cross control. I think two years is a good compromise.

JAKE CAUSEY: What was interesting when Florida did this they said we know there's conflicts with our plumbing code which requires it annually. If we look back at house bill 1048 it says we can't do anything that conflicts with the plumbing code. It's an issue. And keep in mind, I think Florida said that for all backflow preventers serving a residence. So whether it's for lawn irrigation or for some other purpose if it served a residence they went to biannual testing. What we had in here right now is just lawn irrigation which is probably 90 percent. We left it with that.

J.T. LANE: Any other comments or questions on that? All right, any other comments questions otherwise?

PATRICK KERR: July 23rd is a Thursday not Wednesday.

ROBERT BROU: The survey had the most responses for the 23rd.

SHEREE TAILLON: The 23rd at 9 a.m. So yeah, Thursday.

JIMMY GUIDRY: I'll be on vacation so I would definitely want to check and see if there is enough people attending at that time.

J.T. LANE: With that, any other public comments?

ROBERT GILLBRIDE: So I have a few things I would like to go over. First thing is how many people on this panel are certified water or wastewater operators. We have three.

ROBERT BROU: At the table.

ROBERT GILLBRIDE: At the table. And then how many of y'all represent systems that are smaller than 500. Only one. Just trying to get a consensus where we're at here. Some items I would like to discuss is again the difference between community and non community. Y'all are passing these things like ASME tanks. ASME tanks I have a price list here that y'all are going to enforce on these people. We'll start with a 120 gallon tank for small daycares. Regular tank is 495 dollars. ASME is 3,585 dollars. A 220 gallon tank, regular a 1,000 dollars. ASME 4,300 dollars. A 315 gallon tank 1,300 dollars. ASME 4,900.

JIMMY GUIDRY: I have a question. Tell me the difference, tell me in our requirements where we said ASME tanks. Did we say that?

JAKE CAUSEY: We said had to be built to ASME standards. We didn't say it had to be stamped ASME, but had to be built to the standard.

ROBERT GILLBRIDE: You show me one company that is going to stamp a tank that is not ASME and say that it's equivalent.

KEITH SHACKELFORD: We're saying it doesn't have to have the ASME stamp.

ROBERT GILLBRIDE: But it has to be equivalent.

KEITH SHACKELFORD: It has to be built to the standard and you can buy one built to the standard without the stamp much cheaper than a stamped tank.

ROBERT GILLBRIDE: So the engineer, so if Randy designs my system, and I'll pick on Randy cause I know him, and he says we're going to put in X tank then his certification is on the line because he's saying it is equivalent to an ASME standard. Am I wrong or correct?

RANDY HOLLIS: You're wrong. There's a company out of Hattiesburg that will build a tank to ASME standards. They've got the welding certificate, everything. They just don't have an ASME inspector watching it a 100 percent to stamp it. So they will tell you it is built to ASME standards, but it's not stamped. And they are out of Hattiesburg.

ROBERT GILLBRIDE: You're telling me that if as the engineer on record that if you do that, put that in the system, something happens who's liable?

RANDY HOLLIS: That manufacturer.

JAKE CAUSEY: What company is that?

RANDY HOLLIS: I'll get you the name of it. When this came up with Keith I called them and talked to them. And he said our difference is is that an ASME tank has to have an inspector to watch it a 100 percent of the time to certify it. He said we do not have that person here. We x-ray wells, we give you mill certificates on the metal. We'll do every bit of it, we just won't stamp it because we don't have the guy here full time.

ROBERT GILLBRIDE: I've called six manufacturers and everybody is telling me no.

PATRICK KERR: So the 100 dollar tank that you're buying is that like a (inaudible) tank?

ROBERT GILLBRIDE: I'm talking about going to the local water well supply and buying hydropneumatic tank. And that's why I'm saying you have to see the difference between community and non community.

PATRICK KERR: No, we don't. EPA doesn't see the difference for these kinds of things. We have to treat them both the same.

ROBERT GILLBRIDE: When it comes to public health.

PATRICK KERR: That's what we're here for.

ROBERT GILLBRIDE: What does ASME tank have to do with public health?

PATRICK KERR: Resiliency.

ROBERT GILLBRIDE: So you're going to blow up a--

PATRICK KERR: I'm not going to blow up anything.

ROBERT GILLBRIDE: -- tank going over 50 PSI.

PATRICK KERR: I understand your concern.

ROBERT GILLBRIDE: I'm just saying, you're making it hard for small systems to comply. Or not y'all, but the rules and regulations. So I'm simply stating that system we just did was looking at a 1,000 dollars for a tank and had to spend 9,000 because this ASME was enforced.

J.T. LANE: For non community verses community are we using the EPA definition for community verses non community?

ROBERT GILLBRIDE: Yeah, water system. I'm a contract operator so I operate for daycares, stores, restaurants, apartment complexes, little mom and pops in the middle of nowheres that have water that we need to protect. That was one of them.

J.T. LANE: If EPA considers that a community system it's 25 or more residences.

JAKE CAUSEY: Services any residences.

J.T. LANE: Is it people or, so it's people.

PATRICK KERR: It's not 25 trailers, it's 6 trailers.

JAKE CAUSEY: But it serves a residential population, not a business. There's a difference between community and noncommunity. It's people, but if it's people in a residential situation verses people in a work at Home

Depot situation. The use of the water is different.

That's how you delineate community verses non community.

ROBERT GILLBRIDE: Then non community transit and community transit.

JAKE CAUSEY: I think what would be helpful is the information like Randy just shared. Robert has apparently called six people trying to find these things and it's just not easy to find. It's frustrating I believe.

ROBERT GILLBRIDE: So another concern I had is he made a comment, he probably didn't even realize it, said LMI pumps are disposable. Again, in the big picture for big water systems LMI pumps are disposable, but for these little mom and pops a 500 dollar LMI is not disposable. That's what I'm asking y'all to look at. When y'all are making these rules and enforcing them make sure that you're looking at the small mom and pops. I'm not saying we have to cheat on chlorine or anything like that for health, but a lot of this stuff is not for that. Then as far as backflow you cannot rely on these plumbers to install. I have four RPs by my house that are 2 inches off the ground. But they're certified by the plumbers. They're certified by the water system because the water system is Uncle Toms in the middle of nowhere and they don't know what they're doing. I stand hard on that. I am a general tester. The second thing is there is no code

enforcement. So you go to little city in the middle of nowhere inspecting code enforcement to regulate this it's not happening. Thank you.

J.T. LANE: Is there anything y'all want to add? Anyone else that has any other comments they want to share? Thank you Robert, appreciate it.

JIMMY GUIDRY: Could I just ask the question, tell me why that's important, that tank?

KEITH SHACKELFORD: Standards of quality of the manufacturer.

JIMMY GUIDRY: And you didn't have that requirement before?

JAKE CAUSEY: It's in 10 state standards and been there that it has to meet ASME standards.

JIMMY GUIDRY: But not in our code.

JAKE CAUSEY: Well, nothing that was in 10 state standards was written in our code per say.

J.T. LANE: I thought 10 state standards said it had to be certified, but we changed it to had to meet the standards.

RANDY HOLLIS: What we did was we reached a compromise.

You can go to an ASME certified tank that is stamped and it is very expensive. You can go to the tanks that Robert referenced that are made to withstand some pressure, but they're not designed, they're not welded, they're not x-rayed or anything. And so what Robert is promoting is a cheapo tank that we don't know what it would withstand.

And so what we did is, and I'm sorry Robert I take issue with that.

ROBERT GILLBRIDE: But they are stamped that they withhold up to a 100 to 150 PSI. That's all you're worried about. What else are you worried about?

RANDY HOLLIS: Surge. What we did is we compromised instead of the el cheapo tank, cause you're doing it to save money. You're doing it to save money, that's why. And instead of going to the real expensive stamped tanks we compromised and said let's give us a tank that's built to ASME standard, but it doesn't have to have a certification on it. To me it's a good compromise in that we're not costing as much as an ASME tank, but we're not going with the cheapest one that we don't know how it was really built. Cause it's super thin metal and I'm just not comfortable with that. So you're asking me about my professional opinion, I think we came up with a good compromise. How long will that company in Hattiesburg continue to make ASME tanks that are not stamped, I don't know because other states are going to that.

ROBERT GILLBRIDE: All these tanks that I did check on that are non ASME are NSF approved. So you got an NSF approval, you have a 100, 150 PSI approval which is all you're really worried about on a hydropneumatic tank. I mean most water systems small like that don't run above 60

at the very most. So again, all these small tanks, a little daycare running a 75 gallon bladder tank it's not ASME. How are you going to go in there and tell these people they have to put in a 5,000 dollar tank. It's just not feasible for these small systems.

JIMMY GUIDRY: How would that play out if they have to replace a tank that has to meet the standard. If they don't have the tank currently they are going to have to replace their tank?

JAKE CAUSEY: I think that's all to be discussed in the grandfather. I don't think any of that has been determined yet. Certainly if they replaced the tank then I think we know the answer.

ROBERT GILLBRIDE: If we replace equipment we shouldn't have to worry about ASME, right?

JAKE CAUSEY: That's not my understanding. If you replaced the tank you have to meet the code with the new tank.

ROBERT GILLBRIDE: Isn't there wording in there that says if you replace like kind that you do not have to meet?

JAKE CAUSEY: Talking about the language where a permit is required. I think that's the language you're referring about when a permit is required. But install a new tank would definitely need a permit.

ROBERT GILLBRIDE: I just ask you to look at it. I'm not saying anybody is wrong, I'm just saying with this whole

implementation of the rules that y'all have been here to put together and enforce I'm just asking y'all to look out for the little guys. If these little guys can't continue to operate then I can't continue to operate. It's bad for economy, it's bad for everybody else.

JIMMY GUIDRY: I appreciate the input and I am trying to understand it because I'm going to have to decide what I can swallow as a grandfather clause. And it's not a simple answer because every little item you talk about there's somebody that says why do we have to meet that standard and other people that say, the experts say because it's the right thing to do. But 9,000 versus a 1,000.

PATRICK KERR: Our expansion tanks and water heaters all ASME stamped, certified?

ROBERT GILLBRIDE: Water heaters are ASME on fire vessels. These are not fire vessels, but when we looked that up the other day my question is how come can you buy a water heater for 250 dollars.

PATRICK KERR: Cause you buy a lot of them.

ROBERT GILLBRIDE: Once the industry sees that hey we've got them the non ASME's probably won't be, the non stamped probably will not be non stamped or go up on price. I'm dealing with daycares, small mom and pop businesses that are freaking out. Now that we've swapped over to NSF

bleach these guys are used to paying a 1.50, 2 dollars a gallon are now up to 6 to 8 dollars a gallon. It's hurting them and every little thing y'all do, not y'all, every little thing that gets done to these people hurts them and is pushing them, pushing them.

JEREMY HARRIS: Robert have you ever seen one of them fail, one of the tanks, not ASME.

ROBERT GILLBRIDE: No, I have not. I've been in the business for 21 years, I've worked for three different water companies. One of them has several railroad tanks out there that sure as hell ain't ASME. And I can tell you I have never seen one fail.

RANDY HOLLIS: I'll send you a picture or two where it blew the lid off it about 200 feet and hit a house.

JEREMY HARRIS: What size were they?

RANDY HOLLIS: Probably about a 3,000 gallon tank. End of it got blown off and went 200, 300 feet.

JEREMY HARRIS: What was the pressure rating?

RANDY HOLLIS: Probably got water logged with no air pressure the hammer hit it and blew it off.

ROBERT GILLBRIDE: And again, I'm not debating it. I'm just saying on a small 75 gallon tank on a small daycare I don't see it blowing. That's my opinion.

J.T. LANE: Anything else? Do we have a motion to adjourn?

ROBERT BROU: Motion.

DIRK BARRIOS: Seconded.