

DOH Mission: "To protect, promote & improve the health of all people in Florida through integrated state, county, & community efforts."

DOH Vision: "To be the Healthiest State in the Nation."

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Therefore, your e-mail communications may be subject to public disclosure.

From: Anderson, Damann L. [mailto:danderson@hazenandsawyer.com]
Sent: Wednesday, April 11, 2018 5:26 PM
To: Holcomb, Dale <Dale.Holcomb@flhealth.gov>
Cc: Barranco, Ed <Ed.Barranco@flhealth.gov>; Roeder, Eberhard <Eberhard.Roeder@flhealth.gov>
Subject: Proposed Rules 64E-6.009

Dale,

I was a bit surprised when I heard that the proposed rules for Nitrogen Reducing Biofilters were out on the street with a Workshop Hearing on April 16th, since I had not heard anything on the issue for almost a year. I cannot make the meeting, and have not had much time to review the rules, but below are my primary comments for your consideration.

1) I am very surprised there are no monitoring requirements for the proposed system, or no installation of at least one monitoring device at the time of construction. It will be very hard to monitor treated effluent from these systems without monitoring devices installed, and they are much harder to include post-construction. I recommend installation of a suction lysimeter or pan lysimeter just below the denitrification media at the very least, and it would be good to have a monitoring device below the nitrification layer as well, to determine if nitrification is occurring. Without such data, it will be impossible to tell if the systems are achieving their desired goals, or where the problem is if they are not. How will 7 (a) 13. Media replacement be evaluated if no sampling provisions are provided? What happened to the pilot testing of various configurations agreed upon at the last TRAP meeting, so that these systems could be further tested and refined to optimize performance?

2) It appears that you are allowing gravity distribution of STE for these systems. This will result in very deep systems on flat topography, which may be more costly than simply installing a pump and using pressure distribution, which would also give better treatment performance. The exception to this may be where a site has 6-8 ft of topographical drop away from the building, so that system components can still be relatively shallow, but these sites are rare in Florida. I recommend requiring pressure distribution unless such topography can be demonstrated.

These are my primary comments, there are other wording issues that are a bit confusing, but I am sure others will catch all of these. Feel free to contact me if you have any questions on my comments.

Regards,
Damann

Damann L. Anderson, P.E.

Water Resource Practice Leader
Vice President | Hazen and Sawyer
10002 Princess Palm Avenue, Suite 200, Tampa, FL, 33619
813 630-4498 (office) | 813 549-2116 (direct)
danderson@hazenandsawyer.com | hazenandsawyer.com