

Message

From: Todd Parfitt [todd.parfitt@wyo.gov]
Sent: 8/8/2017 11:15:49 AM
To: Forsgren, Lee [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a055d7329d5b470fbaa9920ce1b68a7d-Forsgren, D]
CC: Wagner, Kenneth [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=048236ab99bc4d5ea16c139b1b67719c-Wagner, Ken]; Kevin Frederick [kevin.frederick@wyo.gov]
Subject: Sanitary Surveys in Wyoming
Attachments: EPA-Sanitary-Surveys-and-Determination-of-Significant-Deficiencies-of-Wyoming-Public-Water-Systems (1).docx

Lee, I am following up on our conversation from a few weeks ago regarding the position of Region 8 on sanitary survey requirements for Wyoming municipalities. While I understand the importance of ensuring that drinking water systems are appropriately designed to ensure safe drinking water is delivered to the public, I do have serious concerns about the reasonableness and motivation behind some of the requirements. In particular is the issue of appropriate mesh size associated with water storage tanks to prevent entry or vectors/insects. I am told by R8 staff that Wyoming municipalities must use a 24mesh size even though ALL other R8 states allow a 14mesh. Given that EPA has approved all other R8 programs, this raises the following serious concerns:

1. Consistency and fairness. How is the risk for Wyoming drinking water supplies different than all other R8 states to justify the more stringent requirement. If 14mesh is protective of drinking water for Colorado, Utah, North Dakota, South Dakota, and Montana, why is it not protective for Wyoming drinking water systems.
2. Disproportionate Expense. Is it justifiable to impose an added expense on Wyoming municipalities and citizens when EPA has already determined that use of a 14 mesh in the R8 states (other than Wyoming) does not pose an unacceptable risk.
3. Risk to System Integrity. From an engineering point of view a 24mesh may in fact cause damage to the water tank and system. The concern is that the tight mesh size will result in back pressure, especially if impeded by fine particulates, causing the tank to rupture. Who would be responsible to repair or replace any damaged infrastructure if that were to happen?

Considering these points, I am extremely concerned and frustrated with the position that R8 has taken. My primary concern is that R8 has said that they would allow Wyoming municipalities to use 14 mesh if Wyoming were to take over primacy for the program. As you know we are the only state in the country at this time not to have primacy for the drinking water program.

This explicit attempt to force Wyoming to become a primacy state at the expense and safety of our municipalities is disturbing and quite frankly unacceptable.

We have had several discussions with R8 to try and resolve our differences. R8 is recommending mediation. However, I do not think this is an issue that should take the time and resources of multiple staff of Wyoming DEQ and EPA for mediation to resolve. Common sense should prevail.

I will be at EPA meeting on other Water issues on Thursday August 10th. If you have some time and are available I would like visit with you and work to resolution of this issue.

Todd

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Todd Parfitt

Director

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