

Anchorage Water and Wastewater Utiliyt

Thank you for extending the comment period. Unfortunately I had a vacation planned and have done this review in my spare time on vacation. AWWU also hired a consultant to review the changes.

If you have any questions on the comments created, please feel free to reach to me. Some of the comments are related to the changes and some are related to difficulties we have seen with the current regulations and would like to see changes.

I will be back in my office on 4/7/22.

Sincerely,

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#	Code	Comment	New Due to changes	recommended changes
1	72.005(b)	ADEC should review the definition of person. The current definition is pointed at an individual, when some of the violations could be completed by a company.		x
2	72.005(a)2	Why is private water system being placed here? Why isn't other types of system also placed here. Isn't this already covered under 72.005(a)1?	x	
3	72.005(a)	Why was goal of 72.005(a)2 about protection of the environment removed in this update. That would have covered private water systems and other items that may need protection?	x	
4	72.005(b)2	Is there a reason design isn't covered under the requirements of this chapter. Seems like it should be.		x
5	72.010(b)(2)	There seems to be an unnecessary focus on Private Water systems, when all water systems need protection. Also should water systems be handled in 18AAC80? Why is wastewater being used to control water systems?	x	
6	72.020	This section should not have been disbanded into various places. One central location keeps it simple and prevents confusion as to what system needs what. Central locations for the generally the same requirements also keeps from repeating the same information multiple times.	x	
7	72.055	It is assumed that this isn't a change to the requirements that AWWU operates under as we accept the items in this area. Or does AWWU need a review of our septage receiving stations that above and beyond our current permit?	?	
8	72.060(b)	AWWU applies for a lot of waivers because of the way the separation rules are written. The requirements for separation distances should be revised for utilities in confined rights of ways and often cross each other. This should be coordinated between 18AAC72 & 18AAC80		x

9	72.060(b)	The report requirement here is not necessary for AWWU due to our system being regularly out of compliance with separation to storm and sewer pipes. These are standard in our system and need to adjusted accordingly.		x
10	72.080(b)(1)	Is AWWU at risk of having our operating approval revoked because of a misconception of what needs to be reviewed by ADEC and what we have been delegated or planned to have delegated to us?	?	
11	72.100	Private water systems belong under 18AAC80 not in wastewater.	x	
12	72.100(b)(4)(A)	The vertical separation distance between water and sewer is not achievable without a waiver as water is typically deeper to prevent freezing of water lines. This requirement doesn't appear to be written for typical Alaskan (Arctic) building requirements	x	
13	72.100	Will AWWU's delegation stand or will we have to re-apply? What is liability requirement of the state that AWWU has to provide (18AAC72(c)(3)	x	
14	72.201(c)	What is the review process for ADEC to decide if something doesn't require approval for replacement in kind. AWWU completes a lot of projects of replacement in kind that should fall under this category.	x	
15	72.201(e)(3)	This adds to AWWU's work load and has potentially out weighted failure costs. This should be completed only when ADEC requests it.	x	
16	72.230(a)(5)	I don't think that a change of pipe material should qualify for a reason to review the plans again.	?	
	72.240(c)	Why change the submittal deadline from 90 days to 60 days? AWWU has a hard enough time to achieve the 90 days due to other contract requirements	x	
18	72.240(c)	What is the definition of completion of construction. As mentioned above, our construction isn't technically complete until all contract requirements have been met.	?	

19	72.240(c) (2)(B)ii	The requirement to have a professional engineer stamp the record drawings is problematic for bigger projects that require multiple specialties, but is overseen by one. Also electrical drawings may be stamped, but construction takes place by others and overseen by non-electrical engineers.	?	
20	72.270	Is this intended for single family residential when talking about pump stations?	?	
21	72.270(b)(7)	The exclusion of ground and silty water seems out of place. AWWU has incidental acceptance of groundwater, construction water and surface water from various sources. Would having infiltration be considered a violation?	?	
22	72.530(d)	Where does ADEC have the allowable pipe types listed? One thing AWWU has difficulty with in private sewer lines that are above the maximum. Energy dissipation and drop connects are not beneficial. ADEC should look into if a maximum is necessary as internal house plumbing goes above the maximum and it is okay there. Shouldn't ADEC also address line and grade requirements? Is a small belly okay or not, what about a half pipe belly. What is the slope tolerance. These are areas in which AWWU has addressed, but did not find similar requirements in 18AAC72	?	
23	72.540	Waivers a big item for AWWU due to proximity of community lines. These should be addressed in this update.	?	
24	72.630(d)5	Why require glued joints? Why aren't gasketed joints okay, such as ductile iron pipe and PVC DR 18?	?	
25	72.630(d_	Slope requirements are duplicated here, could be in other places too. Repetitive requirements should be reduced in this update.	?	
26	72.640	This is another section for waivers. Again these are repetitive and redundant. Recommend consolidating to one location for easy use. The waiver requirements will most likely not differ much from type of system to system.	?	