

TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES

LARRY J. WILSON, DIRECTOR

Pick Sandal

May 28, 1997

Attn.: Kenneth Owen
Rathbun Regional Water Association
R.R. 3, Box 265
Centerville, Iowa 52544

Re: All Weather Access Road Variance Request, Avery Wastewater Works

Dear Mr. Owen:

This letter is a reply to the request received by the department on April 28, 1997 from McClure Engineering for a variance from *Iowa Design Standard 18C.10.2, Access*. This standard requires that an all weather access road be provided to the wastewater treatment lagoon site to allow year round maintenance and operation of the facility. The department has reviewed the justification for the variance provided by McClure Engineering and has concluded that the proposal would not result in equivalent access to the facility as that provided by an all-weather access road. Therefore, the variance request is denied. This denial is based on the following:

1. All weather access for maintenance and operation of the facility is fundamental to providing wastewater treatment. The time of year when operation and maintenance is most likely is early spring when it is often raining and there is snowmelt. An operator faced with a thousand foot drive or trek through deep mud will be discouraged from visiting the facility, with or without a four wheel drive vehicle.
2. IDNR Field Office 5 is strongly opposed to permitting construction of wastewater facilities without all-weather access:
 - The facility may be inaccessible to even four-wheel drive vehicles.
 - Daily flow measurement is a discharge permit requirement.
 - The operator needs to be able to get to the facility daily, particularly in the spring when even a little I/I can quickly fill the lagoon. In small systems grease, soap, and objects can plug the influent piping causing it to overflow or backup. In other words, the operator needs quick easy access just to look things over and make sure problems are not developing.
 - Field staff should not have to depend on others to provide rides to facilities.
 - The grassy strip will be grassy the first time its driven over in wet weather, not the third and fourth.

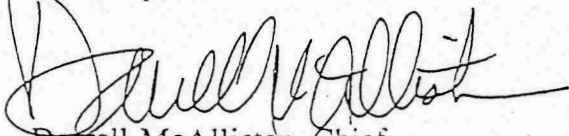
- Field Office experience is that lagoons with poor access are always poorly maintained and operated.

The department has also reviewed the request to not provide a gravel driving surface on the top of the lagoon dikes. The purpose of this requirement is to allow the operator to drive to control structures for lagoon maintenance and operation. Since the lagoon is so small, it will not be that inconvenient for the operator to walk to the control structures from the access road rather than drive.

Four other variance requests have been reviewed and approved. These are for lagoon riprap erosion protection, pond influent piping, number of lagoon cells, and inter-cell control structure.

If you have any questions or comments, please call me at (515) 281-8869, or Bill Graham at (515) 281-5917.

Sincerely,

A handwritten signature in black ink, appearing to read 'Darrell McAllister', written over a horizontal line.

Darrell McAllister, Chief
Water Quality Bureau

cc: Monroe County Board of Supervisors, Monroe County Courthouse, Albia, IA 52531
McClure Engineering, 2701 SE Convenience Blvd., Ankeny, Iowa 50021
Field Office 5

09-19-06

VARIANCE REQUEST

Iowa Department of Natural Resources

1.	Date: May 21, 1997	13.	Decision: <i>Approve</i>
2.	Review Engineer: Bill Graham		Date: <i>6/5/97</i>
3.	Date Received: April 28, 1997		
4.	Facility Name: Avery WWTF	14.	Appeal:
5.	County Number: 68		Date:
6.	Program Area: CP (wastewater)		
7.	Facility Type: C05		
8.	Subject Area: 350, number of lagoon cells		
9.	Rule Reference: 900-64.2(9)a		
10.	Design Stds Ref: 18C.5.1		
11.	Consulting Engr: McClure Engr.		
12.	Variance Rule: 900-64.2(9)c		

15. Description of Variance Request:

The city of Avery and Rathbun Regional Water Association are requesting a variance from the design standard which requires a minimum of three cells for all facilities greater than one acre total surface area. Avery is proposing a two cell lagoon even though total water surface area is greater than one acre.

16. Consulting Engineer's Justifications

Small community pilot project.

17. Department's Justifications

Departmental approval for this variance is recommended since Avery is one of the small community pilot projects.

18. Precedents Used

Other pilot program projects.

19.	Staff Reviewer: William Graham	Date: May 21, 1997
20.	Supervisor: <i>[Signature]</i>	Date: <i>5/27/97</i>
21.	Authorized by: <i>[Signature]</i>	Date: <i>6/5/97</i>