



TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LARRY J. WILSON, DIRECTOR

Pick Soudal

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.

