PB ✓ 9-8-86

DATA ENTERED	DATE	
	1	2 14

DATE RECEIVED	FACILITY NAME	COUNTY NO.	PROGRAM AREA CODE	FACILITY TYPE CODE	SUBJECT AREA CODE
3 4/23/87	4 City of Comell	5 14	6 NP	7 NO2	8 ? 405 (Split Flow)

RULE REFERENCE	DESIGN STANDARD REFERENCE	DECISION / DATE	APPEAL ACTION / DATE
9 62.3(2) e	10 NA	11 Denied 5/28/87	12

ENGINEER	VARIANCE RULE
13	14

15. DESCRIPTION OF VARIANCE REQUESTED: ~~The city is applying for~~ equivalent to secondary treatment and a variance to also be eligible for split flow since they don't think they can meet the equivalent to secondary limits during wet weather flows.

16. ENGINEERS JUSTIFICATION: City plans to retain pumping station to handle 20 yr PHWW flow of 5.2 MGD and add primary "C" clarifier to handle that flow. Flow in excess of 24 MGD would be bypassed around secondary treatment because final clarifiers can not handle 5.2 MGD. Split flow and equivalent to secondary would apply only until 1990 when the new final clarifier would be completed. They don't give any justification in the request other that they will not be able to meet equiv. to secondary for TSS during wet weather. I understand from telephone conversations they want to construct as funds become available

17. DEPARTMENTS JUSTIFICATION: They are not able to meet the TSS equiv. to secondary limits consistently now nor after their first phase as they would not meet the 7/1/88 deadline. The hydraulic loading would prevent them from meeting the limits. Actually they don't qualify for equiv. to secondary. They feel if they can bypass high flows around secondary treatment they could meet equiv. to secondary limits. Their information shows they may still have a problem meeting the Max TSS limit. The final clarifier appears to be the limiting factor. They are planning to construct another final clarifier in 1990. We have to deny the request for variance as well as equiv. to secondary

18. PRECEDENTS USED: None

STATE OF IOWA

RECORD COPY

File Name Carroll -5

Senders Initials SH

TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
LARRY J. WILSON, DIRECTOR

June 10, 1987

Mr. Randall M. Krauel
Director of Public Works
City of Carroll
Carroll, IA 51401

Dear Mr. Krauel:

This is in response to your request for a variance to allow split-flow treatment as well as equivalent to secondary treatment final affluent limits.

In reviewing your request and the rule very thoroughly, the conclusion has been reached to not grant the variance. The rule is very clear that the two provisions are not to be applied at the same time. During drafting of the rule, a conscious effort was made to assure that the rule was written so as not to state or imply in any way that the two provisions could be applied at the same time. The reasoning is that equivalent to secondary treatment already provides significant relief from the effluent limits for existing trickling filter plants. Also, the figures submitted with the request show that even with split flow the facility may have difficulty meeting the total suspended solids limits at times.

At the present time, the facility is not eligible for equivalent to secondary because the records show that the facility can not consistently meet 45 mg/l total suspended solids. However, the facility may qualify after upgrading.

Sincerely,

Steven N. Williams

for LAVOY HAGGE, CHIEF
WASTEWATER PERMITS SECTION

LH:rag/WWPM159N02.01