



May 17, 2012

NR 811 WORKGROUP MEMBERS

Subject: Peristaltic Pump Requirements in NR 811

Dear Members:

Thank you for your timely responses on the requirements of NR 811.39(2)(e)3. After review of your comments and suggestions it appears there is a consensus that, for some peristaltic pump designs, the requirement of NR 811.39(2)(e)3 are overly protective. There does not appear to be a consensus on how to address the issue. Some of the members support retaining the current language and some support a change. After discussing the issue with staff we are proposing the following:

- Retain the language currently in NR 811.39(2)(e)3. This provides the broadest protection and addresses all peristaltic feeder pumps designs and installations.
- As part of plan review of proposed facilities evaluate requests for individual peristaltic feed pump "variances" under NR 811.03 – Alternative requirements.
- Revisit the issue the next time NR 811 is undergoing a major revision.
- Accept the use of peristaltic pumps that were installed as of May 1, 2012 provided they meet the design requirements of NR 811.39(2)(e)3 or they meet the design and installation conditions for variances listed below.

Based on staff evaluation and workgroup member comments, all of the following conditions would need to be met in order to receive a variance:

- The variance approval must occur prior to installation of the chemical feed pump.
- The chemical feed pump must have at least 3 rollers.
- The chemical feed pump must have a sealed housing.
- A check valve must be installed at the chemical injection location.
- The chemical feed pump must be installed above the top of the chemical solution tank.
- The chemical injection location must be at a point of positive pressure.

Thank you again for your timely responses and continued assistance in developing design standards that are both protective of public health and practical.

Sincerely,

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