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Date: Wednesday, October 9, 2024 2:25:02 PM



General Comment

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Amend §3.8 and new/amended Chapter 4, waste management

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Comments concerning proposed rulemakings

I would like to provide the following comments. RRC Statewide Rule 8 (3.8 Water Protection) defines distilled water as “Water that has been purified by being heated to a vapor form and then condensed into another container as liquid water that is essentially free of all solutes.” Under 3.8 (d)(7)(B) the Rule allows “Authorized Recycling” and states under paragraph (iii), “If treatment of the fluid results in distilled water, no permit is required to use the resulting distilled water in any manner other than discharge to waters of the state.” This helps companies like TETRA to direct R&D activities towards exploring and meeting opportunities for reuse of recycled produced water to this level of purity. However, under new proposed RRC rules the incentive to treat water to meet the distilled water definition appears to have been removed. The new Water Protection rules moving to Chapter 4 (Environmental Protection) continue to define distilled water. However, any further reference to the term has been removed from the text even though it is still in the definitions. Under the RRC proposed rule, the paragraph pertaining to the authorized use of distilled water other than discharge to waters of the state has been removed. TETRA recognizes that not all distilled water can be used for all beneficial reuse applications as there may require additional treatment to remove constituents such as: PFAS, volatile organics, ammonia, boron, etc. Any clarification would be beneficial. thank you, Clifford Kirchof Environmental/Chemical Regulatory Compliance Manager TETRA Technologies, Inc.

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Origin

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