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Subject: Comment on 58.01.03 - Individual/Subsurface Sewage Disposal Rules
Date: Friday, January 22, 2016 9:01:17 AM

Hello Paula,

This is written to comment on the proposed Individual/Subsurface Sewage Disposal Rules. I am a licensed professional engineer in the State of Idaho, and an owner of a Norweco advanced treatment system. As such, I am a member of Effluent Technologies, the non-profit set up in eastern Idaho for the Norweco systems.

I am in favor of having state licensed and certified service providers. I am also in favor of having these service providers receive system-specific training from the manufacturer on the systems they service. Based on our experience with Norweco, however, I am doubtful they will be willing to train other service providers other than under the umbrella/monopoly of the current franchise owners for Norweco Systems in Idaho. This problem is compounded in that Norweco will only sell parts for their systems through the current franchise owners who then disproportionately mark up the prices for the parts sold to individuals who are not members of their non-profit. This in an effort to strong-arm members of other non-profits to join their non-profit.

My experience with the service provided by the current franchise owners for Norweco Systems in Idaho has been good, however they have demonstrated an unwillingness to operate under the direction of the non-profit as currently mandated by the State.

I agree with the direction the State is moving in doing away with the non-profits as third-party oversight of the service providers, however, I do not want to be forced back into a State-mandated monopoly as my only choice for my service provider. I am in favor of requiring the ATS's be serviced regularly and a record of these services be provided to the State.

I understand the Norweco system is not provided with a sample port that will allow consistent monitoring of the effluent. I would support requiring Norweco, in order to maintain approval for sale of their systems in Idaho, to design a retrofit sample port for their existing systems. This could be something as simple as a tee and riser installed in the septic tank outlet downstream of the filter. I understand there would be a cost to install the sample port that should be shared between the homeowner and Norweco. I believe monitoring of the treated effluent is an important verification the system is operating properly.

Thank you,

Marvin W. Fielding, P.E.

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