

# **Technical Guidance Committee**

## **Meeting Minutes**

Thursday, June 7, 2018

*9:00 a.m. – 2:00 p.m.\**

**Conference Room C  
Department of Environmental Quality  
1410 North Hilton Boise, ID**

### **TGC ATTENDEES:**

James Craft – Onsite Wastewater Coordinator, DEQ, (TGC Chairman)  
Mike Reno – REHS, Environmental Health Supervisor, CDHD  
Jason Peppin – REHS, Senior Environmental Health Specialist, PHD  
Kellye Eager – REHS, Director of Environmental Health, EIPH  
Joe Canning – P.E., B&A Engineers Inc.  
Kendall Unruh – WEB, Inc. dba Western Septic & Excavation

### **GUESTS:**

Lisa O'Hara – DEQ, Office of Attorney General  
Hannah Young – DEQ, Office of Attorney General  
Whitney Rowley – Administrative Assistant, DEQ  
PaRee Godsill – Everlasting Extended Treatment, ECP, (via telephone)  
Norman Semanko – Parsons Behle & Latimer Attorney representing Presby  
Environmental, Inc.  
Keith Taylor – Taylor Morgan, ETPS, Bio Microbics  
Jim King – Eljen  
David Lowe – Lowridge Onsite Technologies  
Jake Lowe – Lowridge Onsite Technologies  
Lisa Bahr – Southwest District Health  
Lee Rashkin – Presby Environmental, Inc. (via telephone)  
Fred Vengrouski – Presby Plastics, Inc. (via telephone)  
Aaron McCulloch – H.D. Fowler

### **CALL TO ORDER/ROLL CALL:**

Meeting is called to order at 9:00am.  
Committee members and guests introduced themselves.

**OPEN PUBLIC COMMENT PERIOD:**

9:02 AM James Craft opened the meeting for public comments. PaRee Godsill read her comments into the meeting:

**Meeting minutes clarification and Public Comment for the TGC meeting on June 7, 2018**

To: James Craft, DEQ

FROM: PaRee Godsill, Everlasting Concrete Products and Northern Aerobic Systems and Services.

Dear James,

Please review the following comments regarding the March 15, 2018 meeting minutes and Agenda items for public comment.

A. Meeting minutes for March 15, 2018

I would like to clarify some of the comments attributed to me in the March 15, 2018 draft of the meeting minutes pertaining to the SSD Program Update (d).

*“PaRee Godsill said, “It doesn’t make sense to need to have the manufactures certificate. I ask that certificates from the manufacture from group trainings or from other states not be accepted. They shouldn’t be able to present that as an individual manufacturer certificate when it is a state certificate. ... Don’t you think it would be beneficial to have two separate lists?” Norweco has come back and denied some installers,... As a manufacturer we only have one to choose from, then Norweco said no, now we can’t install Norweco.”*

We have experienced a few small problems with the new Service Provider Program. I was trying to relay them to the TGC, so it could possible run smoother. My concerns were about the certification process, the number of complex installers seeking the service provider certificate and the effect on the technology’s approval, and lastly getting a copy of the septic permit from the health departments.

First, a complex installer should not be prevented from taking the states service provider exam, because they do not have a manufacturer certificate. The Rule does not require it for RGF and if the manufacturer is no longer in business. Rule 58.01.03.006.04.b and 58.01.03.006.06(a)

Second, that certificates of training from the manufacturer (Norweco, Orenco, Bio-Microbics, ect.) only be accepted. A 'certificate of training' from an onsite sewage association in-lieu-of the manufacturer certificate should not be accepted. Rule 58.01.03.006.06(a)

Third, was a suggestion to have two Service Provider lists. One list for the ETPS that require a manufacturer certificate and the other for those that do not require a certificate, such as the RGF, ETPS manufacturers that are no longer in business and ETPS that are not seeking 'General' approval. TGM 1.10.1

I was trying to convey that there are not enough complex installers seeking to become service providers. Perhaps more would seek the service provider certificate if they knew they could be on the list for the RGF and ETPS with no manufacturer in business. Turning an installer away because they do not have a certificate seems to be counterproductive. Let's get them in the door and maybe they will expand their business capabilities by seeking manufacturer approval for those systems that require it.

I want to clarify that since the Rule change, Norweco has not denied training to any complex installer because they are a distributor for another technology. They have however denied training due to other reasons related to poor servicing, poor monitoring methods, repairing systems with nonapproved components, poorly repaired components and misrepresentation.

- B. Comments on the proposed changes to the TGM.
- a. Appendix E. 1.9.1 Managed Operation, Maintenance and Monitoring.
    - i. Getting a copy of the permit should be easy and uniform across all health departments. For instance, one district requires a quick email with an address. Another requires a public records request with the legal description. The proposed change to the TGM ask us to obtain a copy of the permit.
  - b. Appendix F. 1.9.3 Annual Reporting of Managed Operation, Maintenance, and Monitoring.
    - i. Suggest starting the program for the July 1, 2019 reporting period. We did not anticipate the additional cost for the 2017-2018 reporting period. The contract fee's have already been collected. You are asking the service providers for Norweco to pay an additional \$6 per permit. That is about \$1,020 for our company.
- C. Item not on the Agenda for public comment: The TGM 1.9.1.2.d **Notation as to whether the system was pumped since the last O&M visit including the portions of the system pumped, pumping date, and volume.** The pumpers are not required to notify the service provider when a pumping occurs. We cannot always count on the owner knowing the volume pumped or if they pumped the correct chambers/tanks. We recently came across components damaged by the pumper and the homeowner did not know until we came out for the service. Pumpers should be required to have a certificate from the manufacturer prior to pumping an ETPS.

Sincerely,

PaRee Godsill

James Craft said the certified service provider list states that recirculating gravel filter systems can be serviced by any of the listed service providers. The list can be expanded to list service providers who only want to provide operation, maintenance, and monitoring to recirculating gravel filter systems. James Craft would need to coordinate with the health districts to get a list of certified service providers who only want be listed under recirculating gravel filter systems.

Mike Reno added that just because a person is no longer certified in Idaho it does not mean they cannot get a certificate from the manufacturer (e.g., ETPS models from the Jet manufacture). Kellye Eager mentioned she recently administered a service provider exam and it was specified to be put on the service provider certificate for recirculating gravel filter systems. James Craft said, "I am willing to expand the list. James Craft agreed with PaRee Godsill's comment that an onsite sewage association certificate is not the same as the manufacturer certificate. As to your public comment "C", DEQ and health districts resources are limited as to notifications when the chambers are pumped. PaRee Godsill mentioned the homeowners are not aware of what to do after the pumper leaves, and she is working the homeowners educating them what to do.

James Craft said he would like to add a discussion on coarse sand and will bring this topic up after the product reviews.

**MEETING MINUTES:**

**APPENDIX A:**

**9:13 AM March 15, 2018 Draft TGC Meeting Minutes: Review, Amend, or Approve**

James Craft said no other public comments on the meeting minutes other than from PaRee Godsill, and asked the TGC members for any other additions or corrections.

**Motion:** Kellye Eager moved to approve the minutes with PaRee Godsill's comments.

**Second:** Joe Canning

**Voice Vote:** Motion carried unanimously with amended comments from PaRee Godsill. Minutes will be posted to DEQ's website as final within 30 days.

**APPENDIX B:**

**9:15 AM Eljen Corporation - A42 Geotextile Sand Filter Proprietary Approval Request**

**(Appendix B)**

- Jim King presenting Eljen A42 Geotextile Sand Filter product to TGC.
- Review of A42 Geotextile Sand Filter Idaho Installation and Design Manual.

James Craft invited Jim King to the TGC table. James Craft said, "Keep in mind

as we review this how we can improve the proposed TGM sand lined systems section.” Jim King first gave a PowerPoint presentation on Eljen’s product.

PowerPoint Presentation:



Slide 3: Jim King said they did NSF testing on 6” of sand via gravity flow.

Slide 11: Jim King said, “The bio mat is only growing on the geotextile fabric. This shows 6 units at 160 gallons per day, and the module was dosed at 25 gallons a day.”

Slide 12: James Craft asked if you could locally buy the geotextile fabric that goes over the top. Jim King said, “Yes you can, but it is provided with the product. The fabric on the system is shaped and constructed with the product and that wouldn’t be easily put on yourself, it comes made all together.”

Slide 23: Joe Canning asked if it was <2% passing in the manual or <5% passing as indicated on the slides. Jim King clarified it was the <2% passing.

Slide 29: Jim King mentioned sometimes our product can be coupled with other systems as a polisher, this picture shows our system with an Orenco system.

Slide 27: Joe Canning asked Jim King for clarification on why you would do a sand mound with this system and that it seems like a lot of sand is required. Kendall Unruh mentioned this sand mound is typical of an at grade system. The TGC members discussed other application scenarios. Joe Canning asked about application rates. Jim King said, “We would absolutely follow your mound requirements. We would ask for the same as other products, for sizing and other requirements.” Mike Reno mentioned you could use the product in a one-foot mound instead of a two-foot mound and be able to save sand. Jim King said after the meeting he would draw up that example and add it to the manual.

After the presentation Joe Canning asked, “What do you do for pressure distribution?” Jim King said they put a pipe inside the four inch pipe. James Craft referred TGC members to page 15 in the Eljen manual that illustrates this pressure distribution setup. Jim King also mentioned the pressure cleanout information on page 16 of the Eljen manual. Joe Canning asked what was gained by pressure distribution. Jim King said equal and continuous distribution and this is typical for larger systems. Jim King mentioned, “In our training we specify, don’t always design to the minimum specifications, because of various overloading scenarios that could happen.” Jim King shared an example of a site that had failed three times and before Eljen came out to install their product as a new system. Jim King stressed the importance of finding out why the site failed and to design a new system from there.

Joe Canning asked, “How does the health department approve designs that need extra components outside of the design manual? These systems are not designed by a licensed engineer.” Jim King said, “The installers have access to our company’s technical staff. Eljen can write a letter to the health department to

help clarify design requirements and Jim King offered to add something in the manual to speak to that. Jim King referred TGC member to the Eljen manual in section 1.1 where it states residential designed systems only and for restaurant system designs to refer to our technical staff.

James Craft asked about installer training and noted the Eljen manual needs to reference this training requirement. Jim King mentioned the installers are trained and there are four ways to receive this training. Jim King agreed to add a statement in the manual about this training requirement. James Craft asked, "How long are the certificates good for?" Jim King said there wasn't a limit on that, if we see they haven't installed one in 4-5 years we call and ask they do training again, but that is not in writing anywhere.

Kellye Eager mentioned, "I would like to make sure that is clear as to what is required from the manufacturer on page 6 regarding the Garbage Disposal section, because the health districts have to fall back on the manual." Jim King stated he is fine with how the section is worded in regards to use of garbage disposals and pointed out that every single system requires an effluent filter. James Craft asked that the manual reference TGM Section 5.9 for approved septic tank effluent filters.

Kellye Eager asked a question on page 10 in the Eljen manual regarding what dual compartment tanks were approved. The TGC discussed an option. James Craft also requested in the Eljen manual in section 1.10 to reference the TGM Section 5.2 for approved septic tanks.

Kelly Eager asked a question on page 12, "Are we okay with the spacing and separation distances?" Jim King mentioned scenarios where this could change based on configurations and soil types. Kendall Unruh asked if there was a min and max distance for these configurations. Jim King said, "Eight (8) feet would be a good center to center on the laterals. Minimum would be three (3) feet lateral to lateral, always with six (6) inches on the edge of the system." Joe Canning and Mike Reno agreed it is helpful to have these guidelines of minimum and maximum in the manual in addition to bed system configurations. Jim King said he would stay as close to Idaho's current guidelines, and Mike Reno agreed that would work for us. Kendall Unruh also agreed saying it would be helpful for the installer and the health department to have that specified in the Eljen manual. Jim King agreed to provide minimums and maximums in the installation instructions.

Joe Canning asked that diagrams on page 9 to change "Per Design" to minimum six (6) feet. Jim King agreed to make that change. Jim King also mentioned on page 14 it states the installation steps, but he will provide a design as to how he would do it, to verify that he and the TGC members were on the same page.

Kendall Unruh asked the committee about the NSF testing at six (6) inches of sand versus why we are testing at twelve (12) inches of sand? Kendall Unruh asked for the history behind that reasoning. Joe Canning said, “The first systems installed were at twelve (12) inches of testing, we want to be on the same standing as other systems.”

Joe Canning commented, “We have specific design manuals for a lot of these systems. I am concerned with getting through all of this for those staff reviewing them at the health department. Is it possible to have a few pages of highlights on the design manuals?” Jim King mentioned he has a document with design highlights and would provide the TGC a copy after the meeting. Kendall Unruh cautioned that this could lead to the manual never being fully read.

Kellye Eager asked, “Is it the standard that for the installation inspection we are seeing the product mostly covered? Are we seeing enough to properly do the inspection?” Mike Reno said, “It is up to the district when they want to see it?” Kellye Eager commented to make sure the installers knew when the inspection points are during the installations. Mike Reno mentioned it depends on the confidence we have in the installer as to how often we inspect. James Craft said, “I want to leave that open to the health districts as to when they inspect and how much they see.” Jim King mentioned that this was a teaching point and a training point in his training process, but not something that is put in their manual.

Joe Canning asked about pump applications with the Eljen product on steep slope applications, and Jim King said he would add in their pumping and venting diagram to address that.

The committee reviewed the homeowner’s manual provided with the Eljen design manual. Jim King mentioned the most important pages were pages 13-14 with the “Do’s and Don’ts”. Jim King gives this manual to everyone that uses their product and it is included in with the installation package. Joe Canning and the TGC agreed that this was great info and a lot of the times the home owners don’t get this, the more information the better coming to the homeowner. Kendall Unruh said he put a comment on social media to solicit feedback on the Eljen product and he heard great comments.

Jason Peppin asked a sizing question from pages 7 and 8, indicating that square feet matters and limited in several situations. Jim King explained further and reassured that there would always have enough area in a bed or a trench application.

**Motion:** Mike Reno motioned to table this until the next meeting pending additional provisions and edits to the manual

**Second:** Kellye Eager

**Voice Vote:** Motion carried unanimously. The Eljen manual is tabled until the next meeting pending additional provisions and edits to the manual.

10:16 AM **James Craft called for a 10 minute break**

10:26 AM **Meeting resumed**

### **APPENDIX C:**

10:27 AM **Lowridge Onsite Technologies – OSCAR-II Treatment System Approval Request (Appendix C)**

- Dave Lowe presenting OSCAR-II Treatment System product to TGC.
- Review of OSCAR II Design and Installation Manuals for Idaho

James Craft invited Dave Lowe to join the TGC table. Dave Lowe was seeking approval barring some edits to the product's manual (i.e., to fix the wrong cross section diagram and to specify the tank sizing as required by the TGM). Dave Lowe provided an official copy of the NSF report distributed a copy to TGC members. James Craft suggested going page by page and addressing any TGC comments during their review of the design manual.

Kellye Eager mentioned on page 2 if it would be twelve (12) inches of sand instead of six (6) inches. Kendall Unruh said, "There needs to be a why we are testing at twelve (12) inches and put a comment on that. It isn't written anywhere, other than that we are being consistent with the first one tested." James Craft commented TGC required the Presby AES and Infiltrator ATL to have twelve (12) inches. Mike Reno added they were tested at both the six (6) inches and the twelve (12) inches and the TGC was more comfortable with the 12 inches. Joe Canning commented that ATL's didn't have testing for that back then. James Craft mentioned it varies state by state, and mentioned a few other states that have it approved at the 12 inches.

Mike Reno had a question regarding coils, he said, "The emitters are much closer than they would be in typical 2 square feet separating the systems, how does this fit in different soil type systems?" Dave Lowe went to page 6 and 7 in the manual regarding flat site to answer this question. Mike Reno and James Craft noted that the example should be either a B-1 at 0.8 gpd/ft<sup>2</sup> or a B-2 at 0.6 gpd/ft<sup>2</sup>. Dave Lowe agreed to make the edits to this example as discussed.

Jason Peppin asked about stretching out the design. Dave Lowe said, "It comes down to more of an aesthetic issue with more sand than anything else, that it

could develop crop circles on the surface, but everything else would be good. No one ever stretches these out, it generally doesn't happen that way. There are ways to do a custom design to make these more aesthetically pleasing and have the coils fit. We calculate the basal area on the 1:1 and for the 3:1 ratios as well." Dave Lowe and Joe Canning discussed laying sand over 1:1 slope to make it a 3:1 slope.

James Craft asked if the diagram on page 7 could be larger to see the smaller writing within the diagram. Dave Lowe said he would do that, "I wanted the whole thing to fit on one page, but I could blow up that section with numbers." Dave Lowe responded to a question from the TGC about what types of plants are acceptable for covering the coil. Dave Lowe said he wouldn't plant a tree on top of the coils but around the coils could be advantageous for nutrient absorption. Anything else could be fine; it is basically a virtual wetland area.

Mike Reno asked a question regarding Table 3 on how three (3) coils in a 97 ft<sup>2</sup> area works for the OS50. Dave Lowe explained the OS100 vs the OS50 and the spacing between them and the increase in length with space between the coils. Dave Lowe also referenced OS240-5 and OS300 diagrams in the manual for further explanation. Mike Reno asked if the coils come pre-fabricated so the installer knows the separation distances needed. Dave Lowe said they do and it is clearly marked, with this product there is some minimal construction at the site.

Mike Reno said, "So this couldn't be considered a sand lined system." James Craft said, "Correct, we would look at different standards for approval." Joe Canning commented, "This would be more of a proprietary system, more of a unique system. You could call it a proprietary mound." Jason Peppin said, "It may be that not all proprietary systems are trenches." James Craft said, "We are thinking of how best to list it in the TGM." Dave Lowe mentioned that was his intent at the last meeting to demonstrate side by side the differences in the two products. James Craft said, "It would be modification in TGM Section 1.4 Product Approval, adapting the language to new technologies. It can be done, it would have to go through draft revisions." Kellye Eager asked if this could allow for six (6) inches instead of twelve (12) inches for testing of systems. Mike Reno replied, "Maybe more of a case-by-case basis with field testing and NSF." James Craft commented, "In the proprietary section would we specify less than twelve (12) inches would require field testing? How long is testing? If the trial doesn't work what happens then? Is it listed as an experimental system? Is it 30 installs over three monitoring seasons?" Mike Reno stated we would approve for six (6) inches with lysimeter install with testing or twelve (12) inches like he has it and if it passes then we could remove the lysimeter requirement for subsequent installs.

TGC requested Dave Lowe add a reference back to the TGM section for septic tank sizing in the installation manual.

Dave Lowe said this will come as a two-part kit with straight forward installation instructions. Joe Canning and Dave Lowe discussed adding a chart/matrix to make the P.E. designs more of a stamped design to help have less site specific custom designs. They discussed the complexities of creating such a chart.

James Craft asked if we could pair this up with other approved products. Dave Lowe said yes, it is in the manual (see Appendix B) to pair up with other technologies. Mike Reno asked if timer settings come preset. Dave Lowe said the kit comes preset with a default setting and stickers are placed inside the door as well with the settings. The TGC discussed the niche this product would fit in with only needing to scar the ground minimally and not affect ground water levels.

Joe Canning commented that separation distances will need to be added in the manual and referenced. Dave Lowe said he would make those changes with James Craft. Mike Reno asked about a maintenance manual for installers. Dave Lowe said, "We will put trainings online and have field trainings as well. It is an annual recertification and we will have a list of providers." James Craft said, "We would require a complex installer for this, but we wouldn't require a service provider." TGC agreed with that statement. Mike Reno said, "Based on edits needed in the manual and in the TGM we would need to table the preliminary approval until next meeting.

The TGC discussed the Installation Manual next. Dave Lowe discussed previous cold weather concerns and the fixes made to address that. Dave Lowe said insulation was not needed as long as they keep the power on in the winter. Dave Lowe shared a couple of diagrams to help explain the changes. He mentions that it seems to work fine with vacation homes, where we would typically have cold weather concerns. Dave Lowe also discussed the diagram on page 2 and measures to avoid freezing.

TGC asked the question on Step 10, "Would the stumps limit the basal area?" Dave Lowe said they leave the stump in place so they still have native undisturbed soil. Otherwise taking it out and back filling with sand would create a conduit for a runoff cavity, we recommend leaving the stumps in place. Jason Peppin mentioned it is nice to have clear guidance in the manual to leave the stump in.

James Craft asked if there was an upper flow limit to this system before the installer would need to contact you. Dave Lowe explained that in a custom

design and for when flows exceed 500 gallons per day that the installer needs to contact him.

**Motion:** Mike Reno motioned to table this until the next meeting pending edits to the manual and changes to the TGM to provide a pathway for approval for products like this OSCAR-II Treatment System.

**Second:** Jason Peppin

**Voice Vote:** Motion carried unanimously. TGC will table its review on the OSCAR-II Treatment System until next meeting pending edits to manual and changes to the TGM.

#### 11:45 AM Jason's Discussion on Figure 3-6 USDA – Coarse Sand

Jason Peppin states the TGM Table 2-1. Sizes of mineral, soil, and rock fragments, on Medium/Coarse sand and TGM Table 2-2. Soil textural characteristics, are not very clear. Jason Peppin added that Figure 2-2 Soil textural determination flowchart after you get past the sands is also not clear. Jason Peppin discussed the Figure 3-6 USDA Particle Size Distribution handout. Jason Peppin said the TGM as it is written now is open to wide interpretation. I have a question here on coarse sand, where does number 16 sieve come from and how is it applicable to coarse sand? I would like to get a historical background on this." James Craft said, "TGM Table 2-1 was updated to correct the equivalent diameter sizes in May of 2016, but the sieve numbers were not changed." Jason Peppin restated, "Does sieve number mean anything, or are we taking the strict guidelines as defined by the National Resources Conservation Service (NRCS)? Sands are coming back from the lab as NRCS guidelines and are automatically categorized as unsuitable." Mike Reno and Kellye Eager asked how field classification is determined in northern Idaho? Jason Peppin explained Panhandle Health District's procedure. Jason Peppin said, "There could be political implications with this, it is too much of a grey area. I would like more of a strict guideline or more clear direction for if and when we would get challenged on this."

Mike Reno asked, "Are you looking for a percent of coarse sand in the system that is suitable for a septic system?" Jason Peppin said, "Yes, from a time standpoint, what we have now is not practical and is too time consuming." Mike Reno mentioned we need a definition of coarse sand on what is the percentage of other sands. Jason Peppin said he wanted to see how other districts are doing it and get more interpretation; the sieve numbers are not matching up between the TGM tables (also referencing TGM Table 3-4 Medium sand (modified ASTM C-33) allowable particle size percent composition)." Mike Reno said, "Based on medium sand requirements if it had at least 25% passing the number

30 sieve you are not at coarse sand. You have enough fines in the column to treat effluent.” Mike Reno also commented, “Use the number 35 sieve from the USDA table then, then you could just use one pan.” Jason Peppin said that makes more sense and the main thing we wanted was some consensus across the table on it. TGC referred to TGM Section 4.23.3.2.3 Pressurized Enveloped In-Trench Sand Filter Design and Construction as another option to further explain their interpretation.

Mike Reno said, “That is what I would do, use the #35 sieve to have 25% passing through.” Jason Peppin commented, “I agree it is clearer now.” Mike Reno added, “The caption on Figure 4-41, maybe it should say impermeable layer instead of porous layer and #4 should say filter and impermeable limiting layer.” James Craft added a note to that in the TGM on #4, page 4-137.

**12:15 PM Break - Lunch (1 hour)**

**1:15 PM Meeting resumed**

Lisa O’Hara, Deputy Attorney General with DEQ, commented that the coarse sand discussion was added to the agenda and although no decision occurred, no formal motion to amend the agenda was made. The discussion on coarse sand will be included in the meeting minutes to be posted.

James Craft said, “Also our discussion on TGM Section 4.23.3.2.3 will be tabled until the next meeting.”

**1:18 PM Discussion on TGM 2.2.4.2.3 Nutrient Evaluation Model Outputs for a Reduced Separation Distance to Surface Water**

- Discuss removing reference to DEQ DRAFT guidance On-Site System Surface Water Separation Distance Determination Guidance

James Craft said, “Until it is completed I don’t think we should add this model reference to the TGM. If you feel we need to complete the model, I can put in a request for a work order to get it done.” Jason Peppin said, “I get requests often for it or something similar.” Mike Reno commented, “I think it is pretty onerous. I think we should get it finished with Mike Cook’s help since he has been working on it.”

**Motion:** Kellye Eager motioned to remove Item #4 from the TGM referencing model and to finish this model.

**Second:** Mike Reno

**Voice Vote:** Vote passed and Motion carried unanimously to remove the reference to On-Site System Surface Water Separation Distance Determination

Guidance.

**APPENDIX D:**

**1:22 PM Discussion on draft changes to new TGM section 4.24 Sand Lined System  
Proposed alternative system section for proprietary treatment technology.**

James Craft gathered requirements for approval, design, maintenance, and construction. James Craft read the proposed TGM Section 4.24 into the minutes, and commented, “Given discussions on the OSCAR-II Treatment System and other proprietary systems maybe “proprietary” isn’t the correct terminology. Maybe be ‘comprised of’ instead of “proprietary”. This would cover products from Presby, Infiltrator, and the upcoming Eljen.”

James Craft asked TGC for clarification on the depth of an Eljen module when used in an above grade capping fill system. Mike Reno explained how the Eljen module would need to be three (3) inches into native grade. Approval condition 5 was modified to specify this requirement. Kellye Eager mentioned adding a quick reference guide for the manuals to aid installers and health inspectors.

Under “Drainfield Trenches” 3, Mike Reno made an edit to clarify how the minimum square footage is calculated. Under “Absorption Bed” #1 changes were added to the TGM to reflect discussion, and after discussion on #2 it was decided to remove it entirely because it is going to be scalable. Section 4.24.4 “Construction” #1 was deleted after it was decided it wasn’t needed. Section 4.24.5 no changes were made per the discussion.

Norm Semanko (from the audience) asked, “During consideration of Infiltrator’s ATL is that the genesis of this?” Mike Reno said, “We were trying to come up with a name to call these types of systems. Dick Bachelder with Infiltrator suggested calling these products “Sand Lined Systems” based on what he has seen from other states (e.g. Alabama).

Norm Semanko said Presby was now on the phone call. Lee Rashkin with Presby joined the meeting via telephone.

James Craft explained this TGM section for Sand Lined Systems is a starting point for discussion and will be available for a public commentary. Norm Semanko said, “Our folks will put together comments on this. I do remember them being volunteered to help with the draft and provide comments later.” Kendal Unruh said, “To clarify Infiltrator didn’t have any part in the draft to this; this was something you (James Craft) created?” James confirmed that.

Lee Rashkin comments and asks how this section came about. Kendall Unruh

said, “We have boxes in the TGM that these systems are not fitting into.” James Craft said, “We are just trying to put a name and a qualifying category for these upcoming technologies.” Lee Rashkin provided more comments and James Craft asked Lee Rashkin to provide his comments in writing during the public commentary period.

Lee Rashkin mentioned Anti-Trust Laws. He said, “I haven’t got a response back from DEQ yet from their letter. Why is additional language beyond TGM Section 4.3 needed? Lee Rashkin disagreed to the conversation of categorization of specificity over performance.” Mike Reno said, “Regarding performance, part of the reason is the manual has to be usable, and for ease of use in the field. Our attempt to combine systems that are similar is for the ease of use for the field staff.” Lee Rashkin said he respectfully disagreed and said he would submit those comments. Jason Peppin said, “Some changes that were provided today are tied to performance, I don’t know what else we can do to address that.” Lee Rashkin provided additional comments. Mike Reno addressed Lee Rashkin’s comment, “Are you wanting a combined treatment and dispersal category name, a different term than sand lined systems? We are open to that please put that in writing.” Lee Rashkin said he would submit that along with his comments. James Craft said, “We look forward to your comments.”

**Motion:** Mike Reno motioned for preliminary approval of TGM Section 4.24 Sand Lined Systems.

During the vote Fred Vengrouski (via phone) asked if he could make a comment, “Can you explain why Eljen is in this category versus why Oscar is not?” James Craft explained briefing explained the difference. Fred Vengrouski said, “In looking at the code itself I am trying to determine one falls into the category vs the other. What is the mechanism to make a system proprietary?” James Craft said, “I recommend submitting that comment during the public comment period.”

**Second:** Jason Peppin

**Voice Vote:** Vote passed and motion carried unanimously. TGM Section 4.24 will be posted to DEQ website during a 30 day public comment period.

## **APPENDIX E:**

### **2:07 PM Discussion on draft changes to TGM Section 1.9 Managed Operation, Maintenance, and Monitoring.**

- Discuss proposed changes for OnlineRME ETPS annual reporting format.

James Craft read into the minutes the changes to TGM Section 1.9.1 Managed Operation and Maintenance number 2. James Craft logged into the OnlineRME.com site to further explain and demonstrate the reporting aspects. James Craft proposed to report on typical system components, and that other system components can be added if needed. James Craft also commented he could have a service provider refresher course where we can go over how to use OnlineRME. James Craft also explained the inspection types on OnlineRME, and added the first couple of months are a free trial period, after that period for every routine report it will cost \$3.00 to enter. Mike Reno asked, "How are the providers going to take the cost? There might be some pushback on that." PaRee Godsill (via phone) read her public comment on section B-b regarding the additional cost, asking that it becomes a requirement for the next reporting period. Mike Reno commented to address PaRee Godsill's comment, "This would be starting July 1st to June 30th of 2019, which is when it would be required, not this current monitoring period which is due July 31, 2018." Jason Peppin asked, "How service providers are going to be notified?" James Craft said both property owners and service providers will get a public notice letter along with a current list of service providers.

James Craft added, "As a note, when reports are entered into Online RME, there is a thirty minute delay until the health department will see it. If an error is made, the provider can request the health department unlock the report for the service provider to fix the mistake.

Keith Taylor asked, "Will all properties be in the database?" James Craft added, "We are trying to update all known systems to be in OnlineRME's data base. If you come across a system that is not listed, you can add one in and it will notify the health department." Keith Taylor said, "Does it have a place where it can show when a system has been pumped?" James Craft explained how that would work in the routine inspection spot on OnlineRME. Mike Reno asked, "Are the health departments charged to print out reports?" James Craft said, "There is no charge except for the submitting inspection report. Also the chain of custody is required to be mailed to the health districts; there will be a spot for the health department to finalize the report once they receive that by mail."

#### **APPENDIX F:**

##### **2:30 PM Discussion on draft changes to TGM Section 1.9.3 Annual Reporting of Managed Operation, Maintenance, and Monitoring.**

- Discuss proposed changes for OnlineRME ETPS annual reporting format.

James Craft read TGM Section 1.9.3 as it relates to the previous section. Mike

Reno said, “As part of the reporting is there a part to submit that the house is vacant and they couldn’t do the report?” James Craft explained there is a comment field in the report that could explain the situation. Keith Taylor commented on property sales, “A pumper comes out not familiar with the system and will come out and not look at the ETPS for an inspection, they only pump it. Homeowners are upset as to why?” James Craft said, “We are not required by rule for tracking pumping reports, only the annual reports are required.” Kendall Unruh said, “I agree, there needs to be a real change, but that is beyond the capabilities of the committee. There is no standardization at all for septic tank property sale inspections. It is called an inspection and there is a different idea of that for each pumper. Jason Peppin agreed with Kendall Unruh’s comment. Homeowners are wanting and guaranteed inspection when going into a property sale.” James Craft said, “Right now we don’t have the best way to communicate with the homeowners for that, I guess trying to get the realtors involved be a starting point.”

**Motion:** Kellye Eager motioned for final approval as amended for Section 1.9 and 1.9.3.

**Second:** Mike Reno

**Voice Vote:** Vote passed and Motion carried unanimously.

2:45 PM **On-site Wastewater Program Update:**

**a. TGM updates on recently approved septic tanks and products;**

James Craft listed recently approved tanks: Bonner Concrete Products Inc 1,000 gallon, LarKen Precast now has two tanks that can accept a BioMicrobics MicroFast ETPS units, and lastly a Norwesco 1,500 gallon green tank. Oldcastle Precast bought out Robertson Manufacturing tanks and acquired all of Robertson Manufacturing’s tanks. Tanks with either name are acceptable during this transition period. Also, an address change for Bio-Microbics was noted.

**b. Installer Bond Form revised;**

James Craft said they changed the obligee from Idaho DEQ to the property owner. Mike Reno asked if James wanted the health department staff to send out the new bond form. James said, “Yes, please send those out with the reminder notices. Any new installers will need to use this new bond form.”

**c. DEQ webpage update – Idaho Code Related to Individual and Subsurface Sewage Disposal Systems;**

The TGC thanked DEQ for providing this resource.

**d. Provide update on OnlineRME implementation;**

James Craft said he plans to send out a public letter in June or July, he showed a draft of the letter.

**NEXT MEETING:**

2:50 PM Schedule Next Meeting

James Craft scheduled the next committee meeting for September 13<sup>th</sup> at 9:00 AM. Meeting start time can be tentative due to flight schedules. It will be held at the Idaho Department of Environmental Quality's state office.

**Motion:** Mike Reno motioned to adjourn meeting.

**Second:** Joe Canning

**Voice Vote:** Motion passed unanimously.

2:52 PM Meeting

**Adjourned**

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**List of Appendices**

Appendix A – TGC Meeting Minutes from March 15, 2018

Appendix B – Eljen Corporation – A42 Geotextile Sand Filter Installation Manual, January 2018

Appendix C – Lowridge Onsite Technologies OSCAR-II Treatment System Design and Installation Manuals March 2018

Appendix D – TGM Section 4.24 Sand Lined System

Appendix E – TGM Section 1.9 Managed Operation, Maintenance, and Monitoring

Appendix F – TGM Section 1.9.3 Annual Reporting of Managed Operation, Maintenance, and Monitoring