

Technical Guidance Committee Meeting Minutes

Thursday, December 13, 2018

9:00 a.m. – 2:00 p.m.

Conference Room C
Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

TGC ATTENDEES:

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

GUESTS:

Lisa O'Hara – DEQ, Office of Attorney General
Larry Waters – DEQ, Wastewater Program Manager
Lori Flook – Administrative Assistant, DEQ
Jim King – Eljen Corporation
Dave Lowe – Lowridge Onsite Technologies (via telephone)
Lori Badigian – REHS, Central District Health Department
Ashley Garrison – Presby Environmental, Inc. (via telephone)
Dick Bachelder – Infiltrator Water Technologies
Norm Semanko – Parsons, Behle & Latimer, Attorney representing Presby Environmental
PaRee Godsill – Everlasting Concrete Products (via telephone)
Lee Rashkin – Presby Environmental (via telephone)

CALL TO ORDER/ROLL CALL:

Meeting is called to order at 9:02 AM.
Committee members and guests introduced themselves

9:05 AM ***Public Comment Period***

Rachael Smith opened the meeting for public comments. Norm Semanko asked about an item on the agenda regarding a product proposal that was previously denied. He questioned how if the Director has final approval on product, according to the rules, there are only 35 days from the date to appeal. Lisa O'Hara disagreed with this and said that new information had been presented related to the product. Rachael Smith said there were other product manuals on the agenda with proposals to modify product manuals for product approval. Larry Waters said that DEQ will be approving products and not specific design manuals.

APPENDIX A:

9:35 AM **Action Item** September 13, 2018 Draft TGC Meeting Minutes
No corrections were noted.

Motion: Kellye Eager moved to approve the minutes

Second: Joe Canning

Verbal Vote: Unanimously passed. The final minutes will be posted to DEQ's website within 30 days.

Old Business

APPENDIX B:

9:40 AM **Action Item**
Eljen Corporation - A42 Geotextile Sand Filter Installation and Design Manual- Proposed alternative cap and fill section

Rachael Smith stated that the difference between the two manuals presented is in Section 5, page 16, 5.3 ABOVE-GRADE CAPPING FILL SYSTEM diagram. A lengthy discussion followed regarding what part of the product was required to be a minimum of 3" into native grade. It was also discussed that the product was tested by NSF with 6" of sand below the product and the TGM requires 12". Someone explained that 12" is required because the installation is not in a controlled environment; 12" is protective of the environment and to prevent groundwater contamination. It was agreed that the previous version of the manual should be used with an edit to section 5.3 of the manual that should reference TGM 4.3.3 rather than TGM 4.3.1.

Larry Waters reiterated that DEQ will now be approving *products* and not *design manuals* and that the products should comply with the TGM. Norm Semanko said that IDAPA Rules require plan and specification submittal which appears to be what the manual would include. Mike Reno and Jason Peppin questioned how health districts would go about having approved products with manuals that did not meet the TGM.

Lee Raskin said someone mentioned that DEQ missed something on Presby's approval. He said this was not the case and that Presby applied as a proprietary system and was approved in this manner. Their aggregate is 3" into the ground. He said they have a history with fully mounded systems and 90% of systems have only 6" of sand below.

Mike said that the Presby approval was not in conformance with the Capping Fill section of the TGM. Lee said that DEQ approved the Presby product using the proprietary section.

Larry stated certain site conditions are not addressed in the TGM and that individual health districts address the site conditions during inspections. Jim King asked whether or not Eljen's product with the revised manual would be approved. Kendall asked whether there was a point in discussing the manual if DEQ is not approving manuals. Larry said the manual gives a general idea of how the system works. Jason said the health districts need manuals to use in the field with solid guidelines to follow. Mike agreed and said that each health district cannot try to compare every manual to the TGM. Lori agreed and said that every situation is different and that it is difficult to give property owners "guidelines". It is helpful to have a manual and a checklist for the products. Larry said that the TGM is guidance and not rules. Jason said a tool sheet for all products may be helpful. Joe suggested that each product could have an "expectations list". Kendall questioned that if manuals are not approved, how are installers supposed

to know how to install products. Jim said that the manufacturer should provide training for their products and installation. Dick asked if the permitting authority has authority to reject the TGM. Someone answered that the state rules say that the TGM must be followed. Mike said that approving products and not manuals would allow the product manual to show one thing and allow the inspector to change expectations based on conditions. Norm stated that the TGM is guidance and that the Director has final approval. Mike again asked if health districts will have to follow the TGM or design manual. He said that health districts should not have to leave it to EHS to make decisions and that in reviewing manuals, the TGC should stick with what exists in the TGM for approval and also approve the product based on NSF data. The TGC relies on DEQ for final direction.

Motion: A committee member motioned to approve GSF product without the proposed alternative Above Grade Cap and Fill section

Second: Joe Canning

Verbal Vote: Unanimously passed. Preliminary product approval will be posted to DEQ's website for 30 days public comment, and then final approval.

New Business

APPENDIX D:

10:55 AM **Action Item** OSCAR-II Design Manual, December 2018

Rachael explained that the OSCAR-II was approved during the last meeting. The revised manual proposed an alternate method of design for C soils based on mound designs and eliminated the maximum basal width of 15' for all system types. Dave Lowe explained the revisions in the manual.

Kellye asked if we needed drafted drawings for the manual or are hand drawings acceptable. A committee member said that drafted drawings would be good.

Rachael asked if the committee should hold off on product approval until the next meeting pending review of the manual edit for medium sand and the drafted drawings. The committee agreed.

Motion: A committee member motioned to table the product approval until the next meeting.

Second: Joe Canning

Verbal Vote: Unanimously passed to revisit at next meeting

APPENDIX E:

11:20 AM **Action Item** TGM Section 1.9.5 Property Owner Operation, Maintenance, or Monitoring Requirements

Rachael explained that the first part of this section was edited based on ETPS program guidance issued last year. Other applicable edits will follow when the ETPS program guidance is updated.

Lori said the ETPS program guidance needs to be updated with appropriate letters and directions to health districts. Rachael acknowledged this.

Motion: Mike Reno motioned to pass edits as written

Second: Joe Canning

Verbal Vote: Unanimously passed. Edits will be posted to DEQ's website for 30 days and readdressed at the next TGC meeting for final approval.

APPENDIX C:

11:30 AM *Action Item* TGM Section 5.5 Approved Non-Discharging Products

Rachael explained that the need for an organized “Approved Non-Discharging Products” section was discussed during the last TGC meeting. The proposed edits to this section would organize composting toilets, incinerator toilets, vault toilets and “Other” into an “Approved Non-Discharging Products” section. A committee member said they did not see any issue with the edits.

Motion: Mike Reno motioned

Second: Jason Peppin

Verbal Vote: Unanimously passed. Edits will be posted to DEQ’s website for 30 days and brought to the next TGC meeting for final approval.

NEW BUSINESS ITEM:

11:35 AM *Action Item* TGM Section 5.14 Proprietary Wastewater Treatment Products

Rachael explained that this item is on the agenda because a committee member suggested it would be useful to have a reference in the TGM for all proprietary wastewater treatment products. Mike said that this had already been discussed during the meeting and did not need to be discussed further.

APPENDIX F:

11:40 AM *Action Item* TGM Section 4.19.3.2 Pressurization Unit

Rachael explained that a health district wanted this item on the agenda because it was unclear to the district and to installers whether the residual head of 5’ in section 4.19.3.2 of the TGM is a *suggestion* or a *requirement*. It was discussed that 5’ is a suggestion and residual head differs depending on orifice size. After discussion of whether or not any edits were needed, a committee member recommended that the equation be edited to read $R = \text{residual head (2.5 - 5 ft.)}$.

Motion: Mike motioned to approve with the edit of $R = \text{residual head (2.5-5 feet)}$

Second: Jason

Verbal Vote: Unanimously approved. Changes will be posted to DEQ’s website for 30 days and brought to the next TGC meeting for final approval.

12:00 PM Lunch Break

APPENDIX G:

1:00 PM *Action Item* TGM Section 4.24.3.1 Sand Mound Absorption Bed Cell Design

Rachael explained that the reference to pressure distribution in the sand mound section was updated to be consistent with changes made to the pressure distribution section 4.19.3.1. Kellye asked for clarification of where this came from. Rachael explained that the numbers in the edits to 4.24.3.1 came from section 4.19.3.1. She asked the committee when the changes were made to the pressure distribution section. Mike said that the changes to that section were made during a TGC meeting a couple of years ago.

Motion: Mike motioned to approve the section with the edits

Second: Jason

Verbal Vote: Unanimously approved. Changes will be posted to DEQ's website for 30 days and brought to the next TGC meeting for final approval.

APPENDIX H:

1:15 PM **Action Item** Infiltrator ATL Design Manual, December 2018

Dick Bachelder presented Infiltrator's request for approval to use a six foot wide trench configuration with three ATL conduit rows.

Lee Raskin asked how far a product can deviate from NSF testing without providing data. He said there is no field data for this proposal. Someone mentioned that some products are approved with configurations that are different than how they were tested for NSF. Jim said that their trench configurations with minimum spacing between modules were tested with NSF. Mike said that the TGCs recommendation for approval should be based on how it was tested with NSF. Jason said that if the TGC is holding some to the NSF standard, then this should be applied across the board.

Motion: A committee member motioned to deny the proposal of reducing exterior width to 6" around ATL on 6' trench.

Second: Joe

Verbal Vote: Unanimously voted to not approve the Infiltrator ATL with the proposed configuration. Infiltrator ATL's original approval will remain.

1:50 PM **On-site Wastewater Program Update**

Rachael provided an update on the on-site wastewater program. She said that since the last TGC meeting, the Clearstream Model DA, Lowridge OSCAR-II, and Dry Flush had been approved. She said because she had received many calls from people inquiring about composting toilet models, the TGM Section 5.5 Composting Toilet Table had been updated to reflect which toilets were still in production. She said she had just finished the OSWP health district audits and would be compiling the statewide report for EPA within the next month.

NEXT MEETING:

1:55 PM **Schedule Next Meeting**

It was decided that the next meeting would be scheduled for March 7th at 9:30AM to be held at the Idaho Department of Environmental Quality state office.

2:00 PM **Action Item – Approve Adjourn Meeting**

Meeting was adjourned