

**Technical Guidance Committee
June 1, 2007
Final Meeting Minutes**

ATTENDEES:

AJ Maupin, P.E., Onsite Coordinator, DEQ Representative
Bob Erickson, South Central District Health, TGC Member (teleconference)
Joe Canning, P.E., B&A Engineers, TGC Member
Mike Reno, Central District Health Department, TGC Member (teleconference)
Roger Albright, R.H. Albright Excavating (teleconference)
Steve Pew, Southeast District Health, TGC Member (teleconference)

GUESTS:

None

The meeting was called to order at 8:50 am June 01, 2007.

OLD BUSINESS

Evapotranspiration (ET) System Section This draft section had received comments, which were discussed. These comments included:

- Removal of the extra Water Mass Balance table from the end of the text,
- Specify salinity testing occur annually during late summer or early fall when the effluent level is at its lowest yielding the highest potential salt concentration,
- Who is responsible for the monitoring and reporting, and
- Recommend that Idaho's Board of Professional Engineers and Professional Land Surveyors (PE&PLS) review and comment on this guidance to verify that it will not require PE oversight.

The responsibility for monitoring and reporting resides with the home owner as the generator of the wastewater. The monthly effluent depth must be compiled and submitted to the Health District annually and it is recommended that the annual salinity levels be submitted also. The Onsite Coordinator committed to removing the extra blank Water Mass Balance table, adding the time frame for salinity testing and contacting the PE&PLS Board to obtain their position on whether this activity would require Professional Engineering (PE) oversight.

A motion to accept the ET System section as modified was made, seconded and passed unanimously.

Extended Treatment Package (ETP) System Section The Onsite Coordinator presented ETP System malfunction rate in support of altering the ETP System section. The Health District (HD) Administrators recommended a trash tank be placed in front of each ETP System. HD representatives got together with DEQ and hammered out a recommendation for TGC consideration.

Recommendations include:

1. Requiring a suitably sized septic tank precede the ETP System,
2. Changing testing requirements to parallel National Sanitary Foundation (NSF) Standard (Std.) 40 tests conducted. This requires changing the 5-Day Biological Oxygen Demand (BOD₅) test to the 5-Day Carbonaceous Biological Oxygen Demand (CBOD₅) test,
3. Clarify Public Works Contractor (PWC) unsupervised activities,
4. Include a flow chart to clarify individual system monitoring and reporting requirements and procedures and a second flow chart to clarify Operations and Maintenance (O&M) monitoring and reporting requirements. This second flow chart will clarify criteria for the O&M to stay in good standing.

Item 1: Clarification developed addressing criteria for and size of preceding septic tank. In order to make the ETP Systems truly 'extended' the primary requirement for a standard subsurface sewage disposal

system must exist at every site. Consequently, each installation must have a primary clarifier (septic tank) volume equal to or exceeding the volume required by Rule (IDAPA 58.01.03.007.07.a). If the ETP System provides that volume, this change does not affect that product. If the ETP System has a small clarifier or no clarifier preceding the aerobic treatment section, then the system will be required to install the appropriate tank volume to, at a minimum, bring the clarifier volume into compliance with Rule.

Item 2: NSF Std. 40 monitors CBOD₅ and Total Suspended Solids (TSS). Currently, the ETP System monitoring requirements specify monitoring BOD₅. CBOD₅ is a subcomponent of BOD₅. When a system is required to monitor and report Total Nitrogen (TN) the system is reporting on nitrogen twice. This is because BOD₅ is a combination of CBOD₅ and Nitrogenous Biological Oxygen Demand (BOD₅ = CBOD₅ + NBOD₅). Additionally, NSF Std. 40 has two (2) monitoring periods. The first is a weekly average, composed of a minimum of three (3) 24 hour composite samples. The second is a monthly average, composed of the month's four (4) weekly averages. NSF Std 40 weekly average limits are CBOD₅ ≤ 40 mg/L and TSS ≤ 45 mg/L. NSF Std 40 monthly average limits are CBOD₅ ≤ 25 mg/L and TSS ≤ 30 mg/L. The HD representatives requested that DEQ return the monitoring and reporting limits specified in this ETP System section to 30 mg/L for both TSS and CBOD₅ instead of widening the passing criteria to 45 mg/L. The TGC concurs with both HD representative recommendations for retaining the monitoring limits at 30 mg/L and changing BOD₅ to CBOD₅.

Item 3: The TGC recommends that the Public Works Contractor (PWC) be removed from the list of acceptable entities for system construction due to difficulties and construction errors encountered with systems installed by PWC. The Onsite Coordinator informed the TGC that PWCs are eligible to construct public system under the supervision of a registered Idaho PE per Rule (IDAPA 58.01.03.006.06.a). The Rule requires that the PWC possess prior experience installing community or municipal subsurface sewage disposal systems and that all work is completed under the direction of an Idaho licensed PE. TGC recommends that the ETP System section be modified to add that clarification.

Item 4: The HD representatives adamantly recommend that any O&M not meeting the 90% functioning system limit be suspended prior to developing a Corrective Action Plan (CAP) as currently shown in this draft ETP System text and flow charts. The TGC recommends that the number of times each malfunctioning system can be tested be limited to three (3). After the third unsuccessful effort to return the system to proper function the system will be classified as a "Failing System" per Rule (IDAPA 58.01.03.004.05) and be required to obtain a permit to repair the system. The initial test that identified the malfunctioning system will not be counted among these three (3) tests. The home owner and O&M will have 90 days to successfully complete their CAP, providing 30 days between testing. The TGC also recommends the criteria for monitoring and reporting on a specific system change from. "Installed before June 30th" to "place into operation before June 30th". HDs that do not receive the certificate of occupancy will rely upon the service provider to inform them of when the home became occupied.

A motion to accept the ETP System section as modified was made, seconded and passed unanimously.

TGC asked for clarification on ETP System section actions required prior to insertion into TGM. Onsite Coordinator indicated that the modified ETP System section will be published for Public Comment. The stakeholders will have their opportunity to review and comment. Any comments received may require DEQ to generate a response to public comment. If no adverse comments are received the new ETP System section is inserted into the TGM.

Onsite Coordinator informed the TGC that frequent complaints have been made concerning the TGM containing the old Health and Welfare Individual / Subsurface Sewage Disposal Rules (IDAPA 16.01.03). The TGC recommends that these pages be replaced with the current Rules (IDAPA 58.01.03).

The meeting adjourned at 9:40 am.