

From: [Fred Vengrouskie](#)
To: [Paula Wilson](#)
Subject: rule revision comments
Date: Wednesday, September 18, 2019 9:18:48 AM
Attachments: [Idaho comments 91819.docx](#)

Paula,

My apologies for my inability to directly participate in today's meeting. Attached are my written comments that I had planned on discussing today.

Thank you,

Fred
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Eljen Corporation Comments: Preliminary Draft Negotiated Rule (Draft No. 1) Docket No. 58-0103-1901, Dated September 3, 2019

009. OTHER COMPONENTS.

01. Design Approval Required.

Commercially manufactured blackwaste and wastewater treatment and storage components and systems may not be used in the construction of a subsurface sewage disposal system unless their design is approved by the Director through the recommendation of the Technical Guidance Committee as directed in Section 004.

Comment/Observation: The wording is unclear regarding commercially manufactured systems being required to have one or two separate approvals and if the TGC must approve the system before the Director considers the product for approval. Is the purpose to make the TGC governing authority over product approvals? Furthermore, does that mean all previous approved products (no matter what class) need to come back to the TGC for commercial use?

009. OTHER COMPONENTS.

03. Extended Treatment Package Systems.

a. In addition to the items listed in Subsection 009.02., extended treatment package system plan and specification submittals shall include:

04. Proprietary Wastewater Treatment Products.

d. A minimum of twelve (12) inches of manufactured medium sand must be installed below the non-sand component of a proprietary wastewater treatment system.

Comment/Observation: It is unclear if our GSF products are Extended Treatment Package Systems or Proprietary Wastewater Treatment Products.

Comment/Observation: If a Proprietary Wastewater Treatment Product is required to conform to prescriptive standard (d) the word Proprietary no longer applies, We recommend replacing all prescriptive standards with

performance based standards for Proprietary Wastewater Treatment Products. If not, do all PWPT products require 12 inches of sand?

In addition, these definitions in section 003 seem to be repetitive.

003. DEFINITIONS.

XX. Extended Treatment Package System. A subsurface sewage treatment product that provides additional biological treatment to septic tank effluent.

XX. Proprietary Wastewater Treatment Product. A subsurface sewage disposal product comprised of distribution media that is capable of providing supplemental treatment to septic tank effluent.

Comment: Recommend making a clear distinction or combining the two.

XX. Manufactured Medium Sand. Sand that conforms to the gradation requirements of ASTM C-33 for size, and less than 2% passes through a #200 sieve for cleanliness according to the following table: **Manufactured medium sand (modified ASTM C-33) allowable particle size percent composition.**

Sieve Size	Passing (%)
100	2-10
200	<2

Comment/Observation: We recommend that ASTM C33 sand have less than 10% passing the #100 Sieve and less than 5% passing the # 200 sieve.