

Idaho Department of Environmental Quality

Individual/ Subsurface Sewage Disposal Rules Negotiated Rulemaking



December 12, 2019

General Housekeeping

- Sign in sheet
- Cell phones off/muted
- Mute phone lines when not participating
- Speak into a microphone and introduce yourself when providing comments
- Be precise, concise and polite
- Participation encouraged!

Outline

- Review of comments received
- Review of Negotiated Rule Draft No. 2
- Discussion
- Next steps

Public Comments

Eljen Corporation

- Difference between extended treatment package systems and proprietary wastewater treatment products is unclear
 - Wording has been changed to address this
- Wording is unclear regarding commercially manufactured systems and approvals by Technical Guidance Committee (TGC) and Director
 - TGC reviews products then recommends to Director for approval. If a product was approved in the past without review/approval from the TGC, the product would not need to be retroactively reviewed by the TGC after the rule change.

Public Comments

Eljen Corporation

- “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?”

Public Comments

Eljen Corporation

- We recommend that ASTM C-33 sand have less than 10% passing the #100 Sieve and less than 5% passing the # 200 sieve.
 - The sieve requirements in the table are based on what is currently used and available in Idaho as “medium sand”.

Public Comments

Public Health Districts 2 & 4

- Suggested edit: “Property owners with an extended treatment package system installed on their property must complete annual operation, maintenance and monitoring requirements ...**The service maintenance year is July 1 through June 30 of each year...**”
 - Suggestion incorporated into draft rule.

Public Comments

Public Health Districts 2 & 4

- “Since the specifications for ASTM C-33 Sand are not the same specifications for Manufactured Medium Sand, we would recommend the removal of any reference to ASTM C-33 Sand from the rule.”
 - Suggestion incorporated into draft rule.

Public Comments

Infiltrator

- Subsection 003, 006 and 009 are not consistent with the usage of “proprietary wastewater treatment products”
 - Draft rule has been edited to address this
- Draft rule includes language which refers to NSF International as National Sanitation Foundation which is its former name
 - Draft rule has been edited to use current NSF name and references

Public Comments

South Central District Health

- Reference to ASTM C-33 in rule is potentially confusing.
 - ASTM C-33 reference has been removed in draft rule.
- ETPS and proprietary sections require standard wastewater disposal drainfields, however most ETPS and proprietary systems install a gravelless drain field, or a drain field made up of the proprietary material.
 - This has been addressed in the draft rule.

Public Comments

South Central District Health

- “ETPS section requires manufacturer’s representative to certify installation of ETPS within 30 days. There are instances when it may be more advantageous for that certification to occur more than 30 days following installation.”
 - 30 days seems more reasonable for health districts to close the permit with final inspection

Public Comments

South Central District Health

- Is the manufacturer's certification considered part of the authorized construction or activity referred to in 005.08?
 - Yes, if the manufacturer's certification is part of the final inspection for the permit, then this would be considered part of the authorized activity.

Public Comments

South Central District Health

- Concern that requiring any product installation configuration different from that used during NSF 40/NSF 245 testing alters the conditions under which the system will function

Public Comments

South Central District Health

- “The nature of proprietary systems means that their design, function, and construction may vary greatly from one product to another. Can the manufacturers propose, and DEQ approve, an inspection checklist for each specific system at the time of product approval?”
 - Yes, this suggestion was added to 009.02.

Preliminary Draft Review

2 + 3 Children stories up to 7 Album ideas.
4 Prophets and etc.

I started with the Genesis as my first album. Mr. Werner Janssen's Symphony Orchestra of Los Angeles will perform the Suite, October 21, 1945 and I believe that about four other conductors will do it in 1945. -- *if the Suite can be finished in time. The names of the conductors for next season.*

I divided the Genesis Suite into seven parts:

1. Prelude
2. Creation *Nathaniel Shilkret*
3. Adam & Eve *Alexander Tansman*
4. Cain and Able *Darius Milhaud*
5. Noahs Ark *Mari Castelnuovo-Tedesco*
6. The Rainbow *Ernst Toch*
7. Babel *Igor Stravinsky*

As for the Prelude, it is the only one number without narrative, and I would like you to submit your ideas rather than you be influenced by mine. However, I will try to give you some ~~more~~ thoughts on it. It should be a Prelude in the same manner as Lohengrin Prelude is to the Opera -- there are other illustrations in Music but you'll understand what I mean -- ~~Haydn~~ Hadys wrote a Prelude ~~in G major~~ but it is not exactly my idea for the Genesis. For poetic and dramatic ideas here are some phrases from the Bible that may help you.

for Creation

- 1.) A Prelude that expresses the phrase "In the beginning God Created the Heaven and the Earth"
- or
- 2.) Any man's expression to the wonder of the Almighty God.
- 3.) The feeling of a man reading "The Creation of the World" up to fall of man in the Bible. Your part in Genesis is separate from the other parts and need not concern you at all.

It should be a composition that can stand on its own in the concert hall or recordings (which of course is a wide audience and not so exclusive, musically).

I would suggest this title.

Prelude -- Genesis -- Bela Bartok
(For Symphony Orchestra)
(Subtitle) In the beginning God created the Heaven and the Earth

Perhaps I have explained all this clumsily but I do want you to be patient with me and excuse my writing. Your acceptance would make me happy.

Yours Sincerely, Nathaniel Shilkret, ~~Composer~~

Questions?



Next Steps

Comments due: January 9, 2020

Next meeting: April 2, 2020



Availability of Information

- Ongoing public comment opportunities and updates will be posted at www.deq.idaho.gov/58-0103-1901.
- To sign up for email notifications, contact Paula Wilson at paula.wilson@deq.idaho.gov.

Thank you!

