

Large On-Site Sewage System
Rule Committee Meeting Summary
March 25, 2008
9:30am – 3:30pm

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Welcome and Introductions

Dave Lenning welcomed committee members, reviewed the agenda with committee members, and asked for member introductions, then audience introductions.

Task 1 – Continue on 2008 LOSS Rule Foundation Document

Richard continued the PowerPoint, covering the remaining topics:

- Specific Technologies
- Specific Requirements
- Fees
- Other
- Definitions

Questions/Comments:

Specific Technologies

- Minimum size orifice diameter and pressures heads for LOSS (*pressured distribution*)
- Reduce pump tank volume with emergency power (*pressured distribution*)
- Can we use non-pressure compensating emitters? (*SDS: Subsurface Drip Systems*)
- Reduce pump tank volume with emergency power? (*SDS*)
- Can exceed reg-specified slope with drip. (*Comments from Jerry, Geo Flow*)
 - a. Soil evaluation texture
 - b. Tyler tables
- Allow drip in type 6 soil
- Should sand-lined trench continue to be approved for LOSS? Do bigger flows make a difference for use?
- Who can operate, monitor and maintain the LOSS? (*Operator certification?*)
- What frequency and scope of monitoring and maintenance?

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- LOSS repairs where reduced soils depth or setbacks – What’s possible to protect public health? Must meet current requirements? (*Probably not. Especially applicable when we find the existing systems not being issued operating permits now*)
- How to deal with Loss expansion?

Definitions

- Compliance with local land use (DOH)
- Enforcement/Appeals (DOH)
- Do OSS definitions fit LOSS?
 - a. Design Flow
 - b. Failure
 - c. Industrial Wastewater
 - d. Installer (*qualified*)
 - e. LOSS (“C”) – flow splitting
 - f. Management Entity
 - g. Monitoring
 - h. Operator
 - i. Operating Flow
 - j. Surge Capacity (*Not defined*)
 - k. Repair – bio, chem. remediation before repair?
 - l. Sewage Quality
 - m. Soil Dispersal Component
 - n. Subsurface soil dispersion component
 - o. Vertical Separations (*which soil types*)
 - p. Public Entity

Other Comments on Issues (identified in the 2008 Foundation Document)

- Create higher level treatment standard(s)? (*Jim Gleason*)
- 3 comments given to Richard B. from Jerry (Geo Flow) design for drip systems.
- On Site Systems
 - a. Jurisdiction
 - b. Include LOSS tracking system
 - c. LOSS operator competency
 - d. LOSS SW & GW impacts – 90.48
 - e. LOSS WW strength & tmt. Needed
 - f. Flow splitting – define LOSS – to avoid
 - g. O&M and oversight – tighten
 - h. Establish fees to support true cost of program
- Bob – Loading – how “500” developed
- Nitrogen loading not specified for RGF [#23]
- Concern: make sure we have treatment processes approved for nitrogen removal.
- What about non-proprietary treatment approval (e.g. RGF) [#11]
- Performance – based standard – prove it works – adjust until it does. Proof = sampling and monitoring.
 - a. What else does the regulation have to specify? (O&M)

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- b. Registered list – pick and install. Minimal testing
- c. O&M still and issue
- Sampling/monitoring = difficult for small systems
- Sampling/monitoring = difficult for DOH to track and enforce
- How do we recognize testing protocols with out updating WAC each time we find a new one? (e.g. Std. 22 –California) [#11]
- Performance standards make more sense for larger systems [#10]
- How to decide if applicant’s data is sufficient and unbiased? Supports standardized testing [#11/10]
- Larger treatment technologies to be considered for lower flow applications? [#12/19] Where (at what flow) do they fail, and vice-versa sometimes cost may be the determining factor. Examples: (non identified)
- Variability of flow: Parks, ski resorts, schools [#8/19]

Agreements: Foundation Document and LOSS Issues Document

Dave asked the group to re-affirm what he thought were decisions from last meeting on the Purpose and Administration and Approval and Permitting Process Sections.

The committee members re-voted the sections below:

1. Purpose and Administration: (Page 3)
 - RAC agreed/confirmed: the section is ready for DOH to draft language (*all green cards*)
2. Approval and Permitting Process: (starts Page 4)
 - RAC agreed/confirmed: the section is ready for DOH to draft *language (all green cards)*

Since all the votes were green cards, Dave asked Melissa to start work on these two sections.

Task 2 – Audience Comments

No comments. (Audience members were invited to ask questions and give comments during the presentations.)

Task 3 – Updates

Melissa McEachron provided updates on the website and progress on meeting location changes.

The location for the next meeting is:

- April 24th in Olympia (WSDOT)

Melissa said she will continue to work on an alternate location for June meeting. If she cannot find a better location, it will be held at the DOH Kent office. (Schedule says Kent office now)

Task 4– DOH’s Initial Priority Cut on Key Questions and Issues

Dave presented the group with the document they would use for the prioritization exercise. The top part of the document (in italics) listed the Department of Health’s Top issues that need to be addressed. The remainder of the document is a chart with

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numbered issues that the committee members would be asked to prioritize before the end of the day.

Italicized Section Discussion

Dave then gave a brief explanation of each of the unnumbered italicized issues and asked the group if there were any questions or any additions. (No additions suggested)

Vote:

Dave asked the committee members to indicate using the cards the level of agreement that DOH's italicized list issues (MUST be addressed issues) "hits-the-mark" and does not overlook anything critical.

The RAC voted and agreed/confirmed (*all green cards*).

DOH staff will research these issues and bring information back to the RAC for discussion at future meetings.

Task 5 – Prioritize Key Questions and Issues

Numbered Section and Priority Discussion

Dave moved onto the numbered section. He reviewed the numbered issues (identified last meeting) and asked the group if they have questions about any of the list.

Questions/Comments

1. Where is public entity in issues document? [DOH list #6]
2. Is financial assurance getting to "public entity"? - No
3. Need for 150% sizing requirement?[#18]
 - a. some think for guidance – site specific
4. Ecology operator certification statute: applicable to
 - a. Any wastewater treatment system expect single family [#24]
 - b. or any system with septic tank and sub surface disposal. [DOH list]
5. Any LOSS system transferred from Ecology to DOH that currently must have a certified operator – will have to continue to have a certified operator. [#24]
6. Reclaimed water installation – GP 3 WWTP: Impact to state parks. Likely to change under new reclaimed water rule (under development) [#24]
7. Operator "in responsible charge" – can Parks/DOT have one "roving" operator to cover multiple parks – or must it be one for one?

After discussion, Dave asked the group and members of the audience to prioritize the issues by marking their sheets with a total of fifteen votes (Xs or stars typically). Dave also asked that the "voter" identify in the top right hand corner which group they fit into: committee member (CM); interested party (IP) or Dept. of Health staff (DOH).

DOH will tally the results and share them with the committee.

Added Task - Qualified Installer

There was enough time to cover one of the topics. Dave and Richard presented information on qualified installer criteria. The committee discussed and voted on the criteria.

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Discussion/Suggestions

- a. LHJ now have certification program – Approved experience out weighs LHJ certification – (opinion)
- b. Question: How do we get a QI? Geographic location is a problem
- c. 3+ years experience doesn't make sense as a qualification. Suggest X systems exceeding Y gallons/day.
 - Size - (residential is very different than commercial) (X=5 Y=1500)
 - Complexity – System complexity – at least pretreatment
 - Issues – Complexity of design & details in installations financial capability of commercial project owner if installer ruins the site, usually no alternative.
- d. Concern: Lack of qualified installers
 - Suggest: More intensive design engineer inspection or during installation. (need to define)
 - Demonstrate Experience
 - Manufacturer may require own certification (not regulatory provision)
 - Richard's Question: Does this regulate a profession?
 - Do these requirements cover the average engineer and average installer?
 - Mamdouh: Minimum level of inspections b design engineer specified in regulation + experience level for installer.
 - Question: must “certified installer” be onsite the whole time during installation?
 - What goes into rule, what goes into guidance?

Vote:

The group voted on the criteria.

A qualified installer meets the following criteria:

- If less experienced installer, require more intensive level of inspection by design engineer.
- Or installer has installed 5+ similar (complexity includes at least pretreatment) projects with flow <1500 GPD
- Still needs designer inspection at some level.

All votes were “green.” Dave asked Melissa to move “qualified installer” forward to draft rule language stage.

Wrap-Up, and Action Items

Announcements: Dave announced that there will be NO meeting in May. (Several conflicts arose)

Technical Subcommittee idea: Dave and Richard suggested a technical subcommittee to look at some of the technical issues may be valuable. Committee members agreed and several volunteered.

Technical Subcommittee Volunteers:

1. Dale
2. Matt

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3. Jim
4. Mark
5. Scott
6. Dave
7. Bill Stuth

Dave mentioned the current thinking is for the technical committee to meet in May, when usual meeting is canceled. Dave also mentioned that DOH is still targeting a rough draft WAC by the end of June, which means a lot of work ahead for the committee and technical subcommittee.

Committee member comments at the end of the day: Dave asked the committee members to give DOH feedback on the meeting:

- Installation discussion – real issue finally
- Going well
- Visit state parks
- Compliments on facilitator
- Like effort to recycle lunch items and going great
- Going fine – will be busy
- Going well – need subgroups to achieve goal of rough draft.
- Ecology – Health relationship = +
- Put more effort on website and email (such as prioritization)
- Well head protection – Lee wants to talk about coordination
 - Separation vertical/horizontal
 - GW Rule
 - Spokane Issues
 - Shorelines master plan regulations - coordination with LOSS rule

Audience Comments: None

Request Information

- Request info from other states on Management Entities. Report to RAC (difficult to find management entities)
- Future Guest Speaker(s) – Consistency (CTED)

For Next Meeting: (April 24th Meeting)

- Report on Priority Exercise
- Guest speakers – operating permits – ODW, DOE – John S., OSWP - Mamdouh
- Assignment: LOSS RAC – review “definitions” and comment to Melissa before the next meeting.
- Note: *NO MEETING IN MAY*

Adjourn 3:40

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Meeting Attendees

Department of Health

Maryanne Guichard, Director, Office of Shellfish and Water Protection
Dave Lenning, Manager, Wastewater Management Program
Denise Lahmann P.E., Engineering Supervisor, WWMP
Melissa McEachron, WWMP Rule Coordinator
Richard Benson P.E., Technical Issues Lead

Committee Members and Alternates	Guests
Bill Stuth, Installers	Jim Gleason, Enviroquip
David Jensen P.E., Design Engineers	Jerry Walton, Geoflow Inc.
Dale Broyles, WA State Parks	Robert Nation, Fextex Systems, Inc
John Stormon, Ecology	Peter Michel, AIM Manufacturing
Jenn Kunkel, BIAW	Ray Gauthier, AIM Manufacturing
Bill Dewey, Environmental Interests, Taylor Shellfish	
Judy Hockett, WSDOT- Operations	
John Poppe, West Sound Utility Dist.	
Jerry Deeter, Local Health Jurisdictions Kitsap Co. Health Dist.	
Scott Jones P.E., Design Engineers	
Matt Lee, LOSS O&M Companies, Aqua Test Inc.	
Mark Nelson, Private Utility District, Evergreen Valley Utilities	
Lee Mellish, (Video conferencing), Utility Districts, Liberty Lake Utility District	
DOH Staff	
Linda Pang P.E., Wastewater Management Program	
Jeanne Andreason, P.E.	
Mamdouh El-Aarag P.E., Wastewater Management (videoconference)	

Parking Lot Items

2/28/08

Legislative Issues:

- UTC regulation of private, for-profit management companies, if allowed.
- Staffing to implement the rule. (inspection workload)

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No adds