

LOSS RAC Discussion Agenda & Record of Decisions

Issue Paper for Technical Subcommittee Meeting		<i>Number of Members Present:</i> _____	
Engineering / Design Topics	Topic Number: 22	50% +1= _____	Two Thirds = _____
Topic Statement	Determine what appropriate requirements for subsurface drip requirements (SDS) should be included in the LOSS rule. – allow in type 6 soil or with steep slopes? Allow non-pressure compensating emitters & if so under what circumstances?		
Background	SDS is a pressure distribution technology that uses ½ inch diameter polyethylene tubing, small emitters (orifices), high in-line pressures, filtration, and other unique characteristics and components to assure uniform distribution of effluent throughout the dripfield (drainfield that uses SDS tubing). A RS&G for SDS has been developed by DOH. WAC 246-272A-0234 contains requirements for SDS and other distribution technologies, as well as limitations on location for all drainfields. Because of the unique attributes of SDS, there is reason to consider modification of requirements that typically apply to other distribution technologies.		
Problem Statement	<ul style="list-style-type: none"> • As noted in the reference section, WAC 246-272A-0234(2) limits the use of SDS for OSS with daily design flows greater than 1,000 gpd to soil types 1-5 and slopes less than 30%. These limits are also stated in the RS&G for SDS. The apparent reason for the limits relates to the greater flow and greater flow density. These limits were set after discussions and technical deliberation by both the TRC and the small OSS rule advisory committee. • Numerous successful installations of SDS have been made in fine textured soils and on slopes even greater than the 45% maximum slope limit that exists for all OSS with design flows less than 1,000 gpd. Some of these installations have been for flows throughout the LOSS flow range. • The small OSS rule and SDS RS&G don't prohibit the use of non-pressure compensating (turbulent flow) emitters. The SDS RS&G that existed prior to July 1, 2007 allowed only pressure compensating emitters. • If the determination is made to allow SDS installation in Soil Type 6 or on slopes greater than 30%, inconsistencies between the LOSS rule and the small OSS rule and SDS RS&G will exist. DOH attempts to assure that different rules are consistent. This would typically preclude the addition of allowances if they were inconsistent until other documents were changed after appropriate technical discussion and input 		

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Reference / Research	<p><u>WAC 246-272A-0234(2)</u></p> <p>(2) All soil dispersal components using a subsurface dripline product must be designed to meet the following requirements:</p> <p>(a) Calculation of the absorption area is based on:</p> <p>(i) The design flow in WAC 246-272A-0230(2);</p> <p>(ii) Loading rates that are dependent on the soil type, other soil and site characteristics, and the spacing of dripline and emitters;</p> <p>(b) The dripline must be installed a minimum of six inches into original, undisturbed soil;</p> <p>(c) Timed dosing; and</p> <p>(d) <i>Soil dispersal components having daily design flows greater than one thousand gallons of sewage per day may:</i></p> <p>(i) <i>Only be located in soil types 1-5;</i></p> <p>(ii) <i>Only be located on slopes of less than thirty percent, or seventeen degrees.</i></p> <p><u>SDS RS&G</u></p> <p>Footnote 2 below Table 5 states: “On site systems with design flows of 1000 gpd or greater are only allowed in soil types 1-5, or on sites with slopes less than 30 percent.”</p>										
	<p>1) Should the LOSS rule permit SDS in a LOSS in soil type 6 or should the rule’s requirements be consistent with the small OSS rule and the SDS RS&G?</p> <p>a) If the committee recommends the allowance for soil type 6 be added, how are the inconsistencies with the small OSS rule and SDS RS&G justified? After answering this question, go to question 3.</p> <p>b) If the committee recommends that the LOSS rule should be consistent with other rules/RS&Gs, go to question 3.</p> <p>TRS Recommendation: NO. The rule should not permit SDS in soil type 6. LOSS should be consistent with OSS.</p> <table border="1"> <thead> <tr> <th colspan="3">Committee Vote</th> </tr> <tr> <th>GRN</th> <th>YEL</th> <th>RED</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>			Committee Vote			GRN	YEL	RED		
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Questions	<p>2) Should the LOSS rule permit SDS in a LOSS on slopes greater than 30% or should the rule’s requirements be consistent with the small OSS rule and the SDS RS&G?</p> <p>a) If the committee recommends the allowance for installation on slopes greater than 30% be added, how are the inconsistencies with the small OSS rule and SDS RS&G justified? After answering this question, go to question 3.</p> <p>b) If the committee recommends that the LOSS rule should be consistent with other rules/RS&Gs, go to question 3.</p>										

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