

WORKSHOPS COMMENTS ON THE DRAFT SEWAGE TANK RULE

April 7, 2009
Moses Lake, WA

1. Renewals - Why is the local health district or department responsible for tank information at renewal?

- If you ask local health for that kind of information, then fund us for it. Otherwise, its just additional work that is an unfunded mandate.

2. What will you do if local health tells you a tank doesn't work right? Wait the 3 years?

- *DOH answer: No we will look at the complaint when it comes in and work with the manufacturer.*

3. When you say watertight –

- What do you mean? Most tanks will seal themselves, if there is a crack. Where is the equality? I don't think you know what we are up against.

4. If you don't watch carefully, you'll split the tank.

5. You need to understand-

- If you take it out of the yard and set it we shouldn't be responsible. You want us to be responsible? When does it end?
-DOH answer: You would not be responsible after installation.

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6. Why don't you have a date that we would hear back from DOH?

- Ecology permits have a date. Add the timeline for review and approval.

7. It would be nice if DOH has deadlines too.

8. Many will wait for the right project for a specialty tank to get approved.

9. You will see plastic tanks or drums in eastern Washington.

- You will do more harm than good.

10. Will we get stuck with old inventory?

- *DOH answer: The panel recommended 1 year for old inventory.*
-I think you need to give us more time.

11. Would the waiver process work for inventory too?

12. Did you have any eastern Washington manufacturers on the panel?

- *DOH answer: Yes. M-1 manufacturing, Wilbert Precast, and Xerxes.*

13. p16 0210(1)(d) Says must be must not be included. Which is it?

- *DOH answer: Must not be is correct.*

14. Are tanks with mid lateral seams included?

- *DOH answer: Yes, if the tank is watertight.*

15. pg 20. Intercompartmental wall fittings and use of slots. Can we still use the tee on the top?

- *DOH answer: Yes.*

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16. What if you hook 2 tanks together, each less than 2,000 gallons?

- *DOH answer: You would need 18 inches.*
-Access is a different number.

17. p. 18(e) Risers. Is that for traffic bearing tanks too?

- *DOH answer:*

18. 24 inches. What measurement is that?

- *DOH answer: Diameter.*

19. Be clear it is a minimum of 24 inches.

- Add (+) or (-) to the 24 inches. It is not usually so exact, but really close.

20. Effluent Screens.

- The effluent screens cause the system to plug easily and they need to be washed indoors. Chelan-Douglas went back to baffles.

21. We tried screens and it didn't work. People won't clean it.

22. People wanted it the rule. Many ways to maintain it.

23. pg. 20. Can we still have the tee?

- *DOH answer: You have that option*

24. 40 inches on any tank? Is there anything that says- use these rules unless in conflict with local rules?

- *DOH answer: The waiver provisions allow local health jurisdictions to issue on-site permits if a conflict occurs.*

25. What happens if I meet the 10%, but not the 9 inches?

26. Why is it important to require length and width?

- We don't want to submit paperwork for every difference that could occur.

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27. Identification - How do you propose to keep the label /date on the tank? Scratch it on?

- *DOH answer: Actually, that would work. We didn't specify the exact method. It just needs to be a permanently on the tank.*

Discussion and Comments

How would you like to see that? dd/mm/yr? Year only?

How is the label done now?

- We cast it on the inside of the riser lid in Jefferson Co. (Put the sticker on the lid)

Do you want to know when the tank was installed on the label or tank?

- *DOH answer: No, the date when the tank was manufactured.*

What about welding the identification on?

I think this will be one more thing to do.

28. Section 0410 – Watertightness, The regulation has more to do with the product itself, why is this section even in it?

- Benton/Franklin doesn't test for watertightness, why do you require it?

What is the difference - if I use a vacuum or water-fill it?

- You are going beyond the tank and to installation with this section.

Prefer the Health District rules to the ones applied. We don't want to do a waiver for every tank.

29. The ASTM standard says the purchaser can choose the testing

30. 0410 (6) and (2) are in conflict with each other.

31. If you get vacuum equipment and test at the manufacturer site, will the tank be tested at the installation site?

- *DOH answer: Yes.*

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32. Renewal Fee.

- It should be a set price for renewal. Without a firm price, it is just open-ended.

33. Fee. \$408.00 for each tank you make? What about different baffle lengths ?

- *DOH answer: Specify what your plans will cover at the initial submittal.*

34. The definition on design engineer and the other RCW.

- It didn't say what the definition of engineer is and that it has to be a WA professional engineer. Why restrict it to WA professional engineer?

35. p28 Homeowners should not be able to certify or design and install.

- I wouldn't allow homeowner to certify the tank as watertight.

36. Who is responsible if the homeowner does or does not do something to the tank so that it isn't watertight?

37. Fee.

- Suggest the state have an annual registration fee of \$15.00 per tank.

38. Nothing refers to calculations for fiberglass or polyethylene tanks.

- We would look at our own rules to put in calculations.

39. How much for vacuum testing? Equipment? What are you doing for air?

- About \$1,000 for the equipment. You have to come up with a lid. I use a compressor on the truck for air.

40. Wenatchee world article says 50% of people had enough money to pay bills for a month. 25% of people have enough money to pay bills for 2 weeks.

- If most tanks go up in price \$175 to \$300, people can't afford that. You will see more tanks put in that are more like drums.

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41. Is there a study saying leaking tanks contaminate anything? Is that why this rule is coming about now? So, if no study- why are we fixing it?

42. Where is the science behind this rule? How many cracks in tanks?

- I don't see why we have to appease a few people.

43. I worry about someone coming to me and saying you are not approved for different holes and boots. How will you handle that? I can see a particular health district saying no. How picky will the health district be?

- *DOH answer: The intent is that if your engineer buys-off on holes in different sizes or places or different boots- you would not have to submit for approval every time a slight change is made to the tank design. Sealing mechanisms ? (Nothing more here)*

44. You are hitting consumers and manufacturers hard on this.

45. Cost will go up the most in areas that are most economically depressed.

46. What about the watertable?

- If it is so far down, why are you worried?

47. We have to have drivers and boom truck operators certified now too.

48. What about letting health districts permit if 10ft down – as a criteria.

- Then test for watertightness.

49. pg 17(4)(d) concrete baffles- Why prohibit them?

- *DOH answer: They are allowed if cast in the tank.*

Inlet and outlet only?

- *DOH answer: Yes.*

-That's not clear. You should make it clearer.

April 2, 2009
Tumwater, WA

1. How does the applicability work for counties? If the design is good for 3 years at the county, how will that work – if I don't install the tank until after the 3 years.

- *DOH Answer: Preferred approach:*
 - (a) grandfather the county design with watertightness testing phase-in. DOH will check with county on how to transition to the sewage tank registered list.

2. Is a professional engineer from another state OK?

- *DOH answer: No. Definition of a P.E. requires licensing in WA. Definition in statute.*
 - Discussion:
DOH should look at that question again. Don't limit it to WA, not that easy to get a WA P.E. license most engineers are using their license properly.
 - *DOH will revisit that issue.*

3. If I'm on the approved list – Do I have to go through the whole process again?

- *DOH answer: Yes*

4. Access Openings

- Do the fiberglass and polyurethane guys have to go with the same thing? (Measurements). May not be able to seal with risers for those tanks.
 - *DOH answer: We used 24 inches in draft to be consistent with large and small systems.*
 - Additional questions and comments -
Recommendations look different from what we (panel) agreed to. I thought 20 inch risers were adequate for fiberglass folks. Norwesco landed on 20 inch for risers
- Did DOH or the panel consider maintenance? 18 inch openings very small

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4. Access Openings (Cont.)

-DOH: yes and so did the panel. Connections are a problem with the access and riser openings in the draft

5. Section 220 – has two #3s.

6. Did you check the length to width dimensions with the fiberglass folks? How about depth?

- *DOH answer: We checked on the length to width ratio and there is not a problem. We have calls in and will check on the depth ratio.*

7. Section 400

- Discussion
 - I have an issue with section 400(1),(2), and (3). You have both manufacturer and DOH instructions. Do one or the other.

Additional questions and comments:

- The DOH way on the instructions will damage tanks. Delete (2) & (3)
 - undisturbed soil; not workable

8. Section 410 paragraph 2 – test to the invert of the outlet

- Why test differently for a pump chamber? DOH should add to the invert of the outlet there too.

9. Watertightness Testing – Section 410 On #6 (d) – any allowable loss?

- *DOH answer: Panel couldn't agree on the number for "allowable" loss under this testing method.*

10. Watertightness Testing – Section 410 On #6 (b) – why seal beyond the testing area?

- DOH needs to change this.

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11. Watertightness Testing – Section 410 On #6 – 9.212 conflicts with the description of the testing procedures later in the section. Does this throw out the specification? Did anyone check with ASTM on what their language means?

- *DOH answer: Panel recommended testing to the invert of the outlet. The ASTM standard is not specific about what “full” means.*

12. Fees – Section 0990

- It'll take about \$30,000.00 to get my tanks approved (based on 20-30 models). Can I get a design and approval on a “generic” plan?
- Can you give 1 approval for a use as a septic tank, grease interceptor, etc? Can you give 1 approval per tank mold?
DOH answer: We designed this piece to allow you to submit plans and for all the uses of the tank. On the initial application, make certain you identify all the types of tanks the plans will be used on and that your engineer stamps all the plans.
- DOH needs to clarify how this will work in the rule.

13. Enforcement – Section 0520

- It says you'll enforce the provisions of the Chapter. Will you really? “Shall” is strong wording. Maybe word it a bit differently.

14. What is the intent of the effluent screen size requirement? Is it only on the outlet?

- *DOH answer: It is up to the designer what size mesh the effluent screen is.*
-Additional questions and comments -
Refer to 272A language here.
What about using 272A for the “list” transition too?

15. What about a tee “glued” to the pipe? Would that work?

- *DOH answer: I think that would work. We'll look at that more closely.*

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16. I'm stupefied that the watertightness testing only has to be to the invert of the outlet. It should be to the top of the invert of the outlet just as in the RS&G Why go backwards? Why would anyone want to make a tank that is not watertight?

- The system is only as good as its weakest link. The cost is small. We should be doing more.

Additional questions and comments:

- If its leaking out higher than the outlet – that's a problem. If its leaking "in", the counties can go more restrictive.
- What is the cost to the environment if there is a problem with the tank leaking?
- In Mason County, O& M and timed dosing help find leaking tanks. We have better placement and better ways to find leaking tanks.

17. Is there a more stringent watertightness test requirement for LOSS?

- *DOH answer: Typically the requirement is found in the LOSS reg. We'll check on the LOSS recommendation and see about including it in this regulation.*

18. On the Approved list- How do we know if a tank on the list is used for the right conditions?

- *DOH answer: Right now we don't know whether tanks are used correctly and under the right conditions.*

19. Typo on page 26. "must be complete". Doesn't read right.