Approved Minutes of the Technical Advisory Committee Meeting

July 30, 2019

**Attendees:** Roger Thompson Carl Fuller

Rodney Pingree Denise Johnson-Terk

Gunner McCain Justin Willis

Steve Revell Graham Bradley

Cristin Ashmankas Rich Wilson

Craig Jewett Bryan Harrington

Mark Bannon Sheri Young

Ernest Christianson

**Scheduled meetings:**

October 3, 2019 1-4 PM The Annex Building

**Department of Environmental Conservation Staff Changes:**

Mary Clark is retiring from the Indirect Discharge Program

Cristin Ashmankas will join Ernie at the central office in the Regional Office Program.

Allison Lowry is the new Assistant Regional Engineer in Essex.

**Technical Advisory Committee Member Changes:**

Peter Boemig asked to not be reappointed now that he is moving into full retirement.

Craig Jewett, Professional Engineer, and Sheri Young, Licensed Designer and

Certified Professional Soil Scientist, will join the TAC.

**Indirect Discharge Program Pre-Rule Making:**

Bryan outlined some information about the Indirect Discharge Program. There are about 90 older systems (existing on or before May 17, 1986) with design flows of less than 15,000 GPD which are subject to a general permit. There are also about 45 older systems with design flows of 15,000 GPD or more that are subject to individual permits with some monitoring conditions. There are about 50 newer systems that discharge sewage waste and about 25 newer systems that discharge non-sewage waste. The Indirect Discharge Rules (IDR) were recently updated and were effective on April 12, 2019. This update was done in association with the update to the Wastewater System and Potable Water Supply Rules (WW Rules) that were also effective on April 12, 2019. The IDR update clarified that the WW Rules regulate non-sewage wastewater systems with a design flow of less than 6,500 GPD and made some updates to the general permit requirements. Bryan said they are in the very early stages of doing a more general update of the IDR rules and have yet to begin public outreach work. He will keep the TAC posted when the process moves forward.

**Innovative/Alternative Systems:**

Graham said that the Geomatrix GeoMat Flat™ and GST™ systems are under review. As the review proceeds the TAC will have a chance to comment.

**Discussion of WW RULES:**

Several TAC members asked questions about the difference in leachfield sizing when using the soil description method or the percolation test method. The WW Rules allow for percolation testing but also require use of the soil description method. If the soil description method results in a more conservative loading rate, it must be used for the design. There are some soil categories that have a large range of reported percolation rates. The group discussed the variability in percolation testing including how well the saturation portion of the test is done and the time of year when the testing is done. There are concerns that the new WW Rules may restrict development when larger systems are required because the percolation test is superseded by the soil description requirement.

The questions discussed included:

1. whether the soil texture and structure categories should be further subdivided

2. whether percolation tests that allow for an increased loading rate should be allowed as the basis of design

3. whether the loading rates assigned for either percolation tests or soil descriptions are in some cases too high or too low

4. if the apparent difference in results from the percolation test and the soil description methods is caused by inaccurate application of one or both methods

The general consensus of the TAC is not to rely on percolation testing but to maintain the scientific approach by allowing a designer to conduct sieve analysis to demonstrate that the soil, which is in a particular category with multiple soil textures, is at the coarser end of the range and therefor should have a higher loading rate.

Ernie and Grahame will do further research into how other states deal with the loading rate issues.

The TAC will continue this discussion at the next meeting.

Steve asked about the requirement that invert elevations be shown for the wastewater piping and distribution system. He noted that in many cases the application is filed to get approval for a lot long before a specific building is proposed for the lot. There are also concerns about how much variation from the approved plan is allowed before an as-built plan and certification is needed. Ernie explained that the TAC had discussed this issue during the process of updating the WW Rules and supported the existing language. Mark noted that the goal is to have a set of approved plans with all the details needed for a competent installer to complete the installation. Ernie thinks that a compromise would be to not require an as-built plan when the system as installed in accord with the design relative to basic requirements such as location, slope, or depth to SHWT even if the invert elevations differed from the approved plan. Sites where some or all the elevations need to be exact in order to comply with the design standards would have invert elevations for the critical areas such as the bottom of the infiltrative area relative to SHWT and bedrock. This topic should be discussed further at the next meeting.