

Sewage Treatment Systems Technical Advisory Committee
NO QUORUM PRESENT, NO FORMAL ACTIONS COULD BE MADE
INFORMAL MEETING NOTES

Date: Tuesday, July 9, 2019
Time: 10:00 a.m.
Place: BWC/OSOSH
13430 Yarmouth Drive
Pickerington, Ohio

TAC Members in Attendance:

Manufacturer Representative & Committee Chair: Chris Mandich
Manufacture Representative: Zak Sherman
ODH Director of Health Representative & TAC Secretary: Rachel Townsend
Ohio EPA DSW Engineer: Brian Hall
Professional Engineer: Walt Sandefur
Ohio Townships Association Representative: Gary Salmon
ODA Soil Scientist: Matt Lane

Absent:

OEHA Registered Sanitarian & Vice Chair: Dan Lark, Lake County General Health District
Designer: David Chronister
AOHC Health Commissioner: Julianne Nesbit, Clermont County Health Commissioner
Public Representative: Christopher Schraff
Installer/Service Provider: Chas Kaiser
Academic: Karen Mancl
AOHC Health Commissioner: Mark Adams, Henry County Health Commissioner

Guests:

Don Carabin: Norweco Inc
Scott Hetrick: Norweco Inc
Dewey Conrad: Ecological Tanks Inc.
Paul Rice: Tangent Company
Travis Genshock: Tangent Company
James Conley: Hydro-Action
Jeff Luthman: Consolidated Treatment Systems
Tom Ashton: American Manufacturing Company, Inc
Tony Nosko: Ohio EPA

Other ODH participants:

Dusten Gurney
Kyle Bianco
Mike Laubert
Audrey Blakeman

Welcome and Introduction:

A quorum was not present. No formal action(s) by the committee were able to be conducted. Those meeting attendees present were introduced.

TAC Appointments Update

No Updates at this time. All positions are currently filled. Discussion was held regarding TAC members who are consistently absent and what ability TAC has to remove and/or recommend replacement of members who do not frequently attend. The TAC bylaws state that the applicable appointing authority may remove a member from the committee for failure to attend two consecutive meetings without showing good cause for the absences. TAC could make a recommendation to the appointing authority, but the appointing authority would have to ultimately act. Committee members also referenced legislation regarding formal appointments and removals to state boards.

Approval/modification to the agenda

A quorum was not present. No formal actions were able to be made by the committee.

Approval of June 11, 2019 Minutes

A quorum was not present. No formal actions were able to be made by the committee.

Tangent Company

600 GPD Landsaver MBR Seeking approval for:

- <20 Fecal Coliform Reduction for Unrestricted Surface Spray Application
- <200 Fecal Coliform Reduction for Restricted Surface Spray Application
- <1,000 Fecal Coliform Reduction for a 2' Soil Depth Credit
- <10,000 Fecal Coliform Reduction for a 1' Soil Depth Credit
- CBOD₅ <25mg/L and TSS <30mg/L for sizing reduction
- Meeting the requirements for Continuous Flush Drip Distribution

The application was tabled at the June TAC meeting as committee members requested additional information and clarification regarding the submittal. Although no formal action or recommendation could be made by the committee Paul Rice and Travis Genshock went before the committee to present the application request on behalf of Tangent Company and address questions raised by TAC members at the June meeting. Before the formal presentation began, committee members had questions regarding supplementary materials received in support of their application. Most committee members present were under the impression that edits and addendums would be made to the application and supplementary materials to reference a maximum design capacity of 360 gallons per day (GPD), but all materials, and the name of the treatment train, still reference a daily design capacity of 600 GPD. Conversation ensued around whether TAC could recommend, and ultimately the Director approve, the application at a lower design capacity when the application and all materials reference a different design capacity. The application also still references a concrete model but the intention is to just seek approval for the plastic version at this time. Concerns were raised about potential confusion that would be created if the TAC were to recommend and the Director were to subsequently approve a product for a specific design capacity that is less than the design capacity referenced throughout the application and product reference materials. Paul explained the intention is to get the system approved for 360 GPD then have it tested at a higher flow capacity and come back seeking approval for 600 GPD. A brief discussion was held regarding the Director's statutory authority

and the statutory deadline surrounding the application. Tangent discussed the potential of withdrawing the application and what would need to be documented.

The presentation continued with Paul and Travis addressing questions that arose from the June TAC meeting including, but not limited to: Clearly indicating that an initial 2-years of service is not included with the purchase of unit, clarification on the proper procedure for obtaining effluent samples, disinfection steps for the startup procedure, revisions to the installation checklist, submission of raw data and clarification of the fecal data and dilution steps taken by BioSolutions during the analysis of the effluent, failsafe conditions, and submission of the appendix C effluent spreadsheet results. Those in attendance discussed some of the differences between NSF testing and certification versus the field testing performed for this product such as, uniformity of the testing procedures and analysis, ability to test at a specified flow rate, not being able to touch the unit for the 6-month testing cycle, and audits of distributors. Paul noted that Tangent has been in discussion with Chagrin wastewater treatment plant to test the treatment train at 600 GPD with the intent to apply for a higher design capacity and to seek approval for the NPDES standards. Input was sought from committee members. It was noted that if approved for meeting the performance standards of drip distribution a drip assurance package would still need to be submitted and approved administratively by ODH prior to the product being listed as approved for use in Ohio for drip distribution installations. Tangent company did ultimately elect to formally withdraw the application with the intent to resubmit with some of the discussed changes incorporated into the application.

Norweco

Norweco Singlair R3 System seeking approval for:

- NPDES Discharging System
- Type 4 Gray Water Use

Due to the TAC committee not having a quorum present, Scott Hetrick of Norweco requested that their application request be moved to the August meeting. Scott asked the committee members present if there were any questions about the data submitted in support of the application request. It was noted that there was no summer ammonia data submitted.

Field Data Discussion

Although not on the agenda committee members wanted to discuss field data requirements for renewal of products. TAC members previously voted and approved Appendix E to Standards, Guidelines, and Protocols for O.R.C. 3718.04 Review (2020-2025 Product Renewal Standards). Effluent standards are written in rule 14, and do not differentiate between field data verification and lab testing data. Discussion was held regarding the variability and discrepancy of health district's enforcement of operation and maintenance requirements and the role and accountability of manufacturers in operation and maintenance activities. Many committee members expressed concerns with the stringency of the current effluent quality standards, especially if they were to be applied to effluent data from field verification sampling. Comments were made that commercial and municipal treatment systems nor package plants (all of whom have an operator overseeing system functionality and performance) are not held to this high of a standard and some members feel it is unreasonable to hold household systems to this standard. Many of those in attendance expressed concern that applying the effluent quality standards for initial approval to requirements for renewal will severely limit manufacturers from conducting business in Ohio. It was recommended that the

manufacturer should only need to demonstrate that a mean or geometric mean of effluent data for field verification meet the effluent quality standards as opposed to the mean/geometric + one or two standard deviations (depending on the standard) because of uncontrollable variables from household to household. TAC members mentioned that currently rule 13 states ODH may require field data and is not explicit to the same standards as for initial approval. Others in attendance noted that there may be treatment trains that have been approved that should not be renewed. Currently Rule 13 has not made it out of ODH. Once it does it will go to the Joint Committee on Agency Rule Review (JCARR) for review. At that time a notice to manufacturers may be considered in order to inform them of the staggering of renewals and what will be required for a renewal application submission. Committee members again expressed concerns with time restraints and the challenging logistics moving forward.

Additional Updates

Chris Mandich asked for any additional updates. None were noted.

Next meeting:

The next TAC meeting is scheduled for August 13, 2019 at BWC/OCOSH.

Adjourn:

No formal adjournment was made due to the lack of a quorum.