

RE: proposed tech standards update/changes

John Laudano <JL@qvhd.org>

Wed 8/25/2021 11:40 AM

To: 'Robert Scully' <robert.scully@po.state.ct.us>

Cc: MHosseini@mptn-nsn.gov <MHosseini@mptn-nsn.gov>; phyllisamodio <phyllisamodio@bristolct.gov>; Kevin.elak <Kevin.elak@middletownct.gov>; chris.butler.cb@gmail.com <chris.butler.cb@gmail.com>; cehatreasury@gmail.com <cehatreasury@gmail.com>; ekavanah@hartford.gov <ekavanah@hartford.gov>; EricaMikulak@bristolct.gov <EricaMikulak@bristolct.gov>; Kristen Amodio <kamodio@qvhd.org>; Syenco@crahd.net <Syenco@crahd.net>; Brian.Falkner@newbrianct.gov <Brian.Falkner@newbrianct.gov>; kbaldwin@llhd.org <kbaldwin@llhd.org>; LPagliari@ci.milford.ct.us <LPagliari@ci.milford.ct.us>; Sbyrden@meridenct.gov <Sbyrden@meridenct.gov>; Pawlik, Matthew <Matthew.Pawlik@ct.gov>; Merrigan, Sean <Sean.Merrigan@ct.gov>; Clark, Amanda <Amanda.Clark@ct.gov>; Jeff Polhemus <jffpolh@yahoo.com>; Ryan McCammon <Ryan.McCammon@chathamhealth.org>; Ryan Currier <rc@qvhd.org>; Kristen Amodio <kamodio@qvhd.org>

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Bob and others,**Recently I sent you an email correspondence dated June 10, 2021.**

That email consisted of my observations of, and comments on, the currently proposed changes to the Technical Standards of the Public Health Code as related to subsurface sewage disposal systems. The observations are numbered one through eleven.

I hereby retract my comments, in their entirety, contained in item eight (8) and item ten (10) of the aforementioned email. From this writing into the future the contents of item eight (8) and ten (10) are no longer representative of my opinion, viewpoint, or concern of the topics they relate to.

Please make it known to any and all persons interested in, or potentially interested in, the matters of the contents of this correspondence, and the referenced June email, that I do not hold an observation or opinion on either of the topics referred to in items eight (8) and/or ten (10).

John

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From: John Laudano

Sent: Thursday, June 10, 2021 1:36 PM

To: 'Robert Scully' <robert.scully@po.state.ct.us>

Cc: matthew.pawlik@ct.gov; Merrigan, Sean <Sean.Merrigan@ct.gov>; amanda.clark@ct.gov; Jeff Polhemus <jffpolh@yahoo.com>; Ryan McCammon <Ryan.McCammon@chathamhealth.org>; Ryan Currier <rc@qvhd.org>; Kristen Amodio <kamodio@qvhd.org>; Lynn Fox <lf@qvhd.org>; Alexis Rinaldi <ARinaldi@qvhd.org>; Karen Wolujewicz <kwolujewicz@qvhd.org>

Subject: proposed tech standards update/changes

Bob and others,

I read the summary and have a few thoughts. (Don't I always?)

1. **On page two in the paragraph that starts "Item R", what is the second to last sentence about? We don't typically get involved with the distance that geothermal piping is away from the geo borehole or trench,**
2. **On page two in the second paragraph starting "Subsection A", it would be wise to encourage two-way cleanouts or to consider whether a single cleanout should direct a snake in a particular direction,**
3. **On page two in the paragraph starting "Table 2", is "Fernco" appropriate or should a generic name be used instead of advertising a particular product? Or, has Fernco become generic?,**
4. **On page three and others, can we please stop using the word "Repair". Tanks and systems get replaced not repaired. Please,**
5. **On page three in the paragraph starting Subsection A, can you provide the rationale? See my last discussion/frustration email about this also. This creates a major inconsistency when you compare products for a design. I don't understand the need for the tank outlet invert to ever be higher than the invert of the leach product except to insure gravity flow. If there is a technical/engineering reason please tell me,**
6. **On page three the last paragraph; can you tell us what the discussion is about and what is proposed?,**
7. **Page four, first paragraph; what is a stabilized rate?? What accuracy is required?? Consider the red, slow soils that are being improperly perc tested and then get assigned ten minute rates and then systems fail prematurely. Perc tests are not being done well enough. I maintain that there needs to be a minimum of three perc tests per leach area. Always. The perc errors are huge. The difference in rates between multiple percs, all within fifty feet of each other, is almost always enormous. I have the data. I see it routinely. Couple this kind of error with over-rated products and failures are certain,**
8. **Kudos for promoting subdivision designs with ELA-credit-limited products. I think ten is high but it's a good start,**
9. **On page four I think the reduction in up-slope select fill is an excellent idea but I would like to see five remain for the ends. The ends are always the portion that get shortchanged on sand and where a failure is predictable,**
10. **On page five second paragraph- why now?? Why not when Richard and I designed S-box? What changed?,**
11. **Page five; two more places, "repairs" gets used when "replacement system" is the topic. I realize I'm beating a dead horse but customers and homeowners pick up on the language being incorrect especially when the paperwork is related to a real-**

estate transaction and someone thinks that a septic system was repaired and not replaced.

John

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