

From: David Potts [mailto:DPotts@geomatrixllc.com]
Sent: Wednesday, April 16, 2014 4:52 PM
To: Scully, Robert
Cc: TWA220@aol.com
Subject: Summary of Proposed January 1, 2015 Revisions to the Technical Standards for Subsurface Sewage Disposal Systems

Bob,

I offer the following concerning the above referenced document.

1. I am supportive of allowing drip systems in CT. However, I believe that the best way to incorporate in this type of system would be to have a generic alternative ELA rating for all shallow placed pressure dosed dispersal technologies (SPD); not just drip. This is the methodology that was utilized in the EPA BMP guidance document entitled "Recommendations of the On-site Wastewater Treatment Systems Nitrogen Reduction Technology Expert Review Panel". Under this alternative ELA analysis, any SPD technology that fits this definition, with suitable documentation, could utilize this alternative ELA methodology and alternative center to center distances between laterals. It is poor public policy to exclude all viable and comparable technologies.
2. I also believe that all of these SPD technologies should have the same requirement, or lack thereof, for P.E. design. Although we have seen no reason for necessitating a P.E. design, we are only seeking consistency.
3. I also recommend that the language "since limited effluent application does not result in biomat growth at the orifice holes on the drip lines." be eliminated. It is simply incorrect to say that there will be no biomat growth at or adjacent to the orifices, tubing and the like. There are numerous studies and pictures that document this biomat occurrence. The question is not whether or not biomat will be visible, but whether or not it will negatively affect system performance.
4. Assuming that I understand what "credited height (3/4 up the distribution pipe)." means, I am generally opposed to it. The distribution pipe should be above the level of infiltration. Upon completion of a dose passing through openings in the pipe, the invert of the pipe should not be under water. If the holes in the bottom of the pipe are under water, oxygen and gas transfer cannot occur. The infiltrative surface area coincident with the pipe is available for infiltration should it be necessary. However, crediting this surface area only diminishes inherent safety factors.
5. Although this change relating to crediting $\frac{3}{4}$ of the height of the distribution pipe would allow Geomatrix to simply lower all of our distribution pipes, have a lower profile and be more competitive; I feel that it is in the best interest of the industry, general public and environment that leaching systems should be credited below the invert of the pipe.

Respectfully Submitted,

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