

From: Dan Ottenheimer [mailto:dottenheimer@oaksoninc.com]

Sent: Tuesday, September 09, 2014 3:12 PM

To: Scully, Robert

Cc: Clark, Amanda

Subject: comments on proposed Technical Standards as it relates to Perc-Rite Drip Dispersal

Bob,

As I said in person to you, a huge thank you to you and your team for helping to advance the possibility of people being able to use Perc-Rite Drip Dispersal in Connecticut.

I have reviewed the proposed amendments to the Technical Standards and offer the following:

1. In general, they are well written and well-conceived and will achieve what I believe to be our mutual goal to provide a different solution for people to use than has been traditionally allowed
2. I looked at the proposed changes to Section VI as requested and I think they are ok. I do find the existing pump system requirements in Section C are acceptable as written for use with Perc-Rite with one small notation for you to consider: since everything comes as a package we do not need the designer to specify all the internal components as indicated in the first sentence of the third paragraph. Those specifications would only be needed for a non-proprietary configuration
3. Proposed changes to Section VIII gives me slight pause. We have found it problematic when regulatory codes dictate the minimum spacing between the drip tubing as currently proposed at 1.5'. For example, what if there is a rock or tree to work around and in that one spot the tubing is 1.25' apart - would that need a variance? That restriction goes against the benefits of using drip dispersal. Seems smart on paper but it becomes a real problem in the construction phase. What we generally recommend is for the designer to determine the footprint area needed and then we help figure out the best tubing configuration and spacing that goes within that area. I think DPH's goal here is to make sure that the drip field is at least as large as what a footprint would be needed on the property as if a trench system were to be proposed. Correct? If so, that makes sense and I have no problem with that. I would suggest the following language at the end of bullet that begins with "Change language in Section H...." to change the wording as follows: ".....four times the required linear footage of a 3-foot wide leaching trench system calculated based on the building served. ~~and the tubing shall have a 1.5-foot minimum center to center.~~ Tubing spacing may vary but in no case shall the drip field be less than the required footprint area needed for a 3-foot wide leaching trench system."

Also, I am copying Amanda on this to ask you both whether we should plan on attending the CAC meeting next Tuesday? I have a conflict and want to see if I should try re-arrange things to be there if you think Perc-Rite will be discussed.

Thanks,

Dan

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