

Technical Guidance Committee Meeting

Agenda

Thursday, September 7, 2017

*9:30 a.m. – 2:30 p.m.**

**Conference Room C
Department of Environmental Quality
1410 North Hilton
Boise, ID**

TGC ATTENDEES:

James Craft – Onsite Wastewater Coordinator, DEQ, (TGC Chairman)
Mike Reno – REHS, Environmental Health Supervisor, CDHD
Jason Peppin – REHS, Senior Environmental Health Specialist, PHD
Kellye Eager – REHS, Director of Environmental Health, EIPH
Joe Canning – B&A Engineers Inc.

GUESTS:

Lisa O'Hara – DEQ, Office of Attorney General
Larry Waters – PE, Wastewater Program Engineering Manager, DEQ
Whitney Rowley – Administrative Assistant, DEQ
PaRee Godsill – Everlasting Extended Treatment, ECP, Norweco
Norm Semanko – Parsons Behle & Latimer Attorney representing Presby Environmental, Inc.
Keith Taylor – Taylor Morgan
David Lowe – Lowridge
Dick Bachelder – Infiltrator Water Technologies
Dale Atkinson – Atkinson-Jet Septic
Tim Wright – Southwest District Health
Lisa Bahr – Southwest District Health
Allen Worst – R.C. Worst & Company, Inc.
Lee Rashkin – Presby Environmental, Inc. (via telephone)
Fred Vengrouski – Presby Plastics, Inc. (via telephone)
Sheryl Ervin – Bio-Microbics (via telephone)

CALL TO ORDER/ROLL CALL:

Meeting is called to order at 9:30.
Committee members and guests introduced themselves.

OPEN PUBLIC COMMENT PERIOD:

9:32 AM James Craft opened the meeting for public comments.

James Craft mentioned Allen Worst had requested to give public comment about the nitrogen policy. James Craft asked if Allen Worst's comment could wait until later in the meeting as it may be related to another discussion item on the agenda. Allen Worst agreed to give comment later when his issue was addressed.

James Craft mentioned Norm Semanko had also requested to give public comment regarding items on the agenda. Norm Semanko from the audience wanted to clarify if the recently submitted Presby letters would be read into the minutes at the 11:00 and 2:00 agenda times. James Craft asked that a representative from Presby read the letters into the minutes during those noted agenda times.

Norm Semanko had a second comment regarding Presby receiving notice in the TGC meeting agenda from a non DEQ member and wondered if this was standard procedure. James Craft apologized for any mix up in communication about the notice regarding the change in agenda items and said next time official notice will come from DEQ and not from outside third party.

MEETING MINUTES

APPENDIX A

9:37 AM **June 8, 2017 Draft TGC Meeting Minutes: Review, Amend, or Approve**

James Craft asked for any comments on the previous meeting minutes. No public comments were given.

Motion: Mike Reno moved to approve the June 8, 2017 TGC Meeting minutes as they stand.

Second: Kellye Eager

Voice Vote: Motion carried unanimously. Minutes will be posted to DEQ's website as final.

9:38 AM **Attorney General's Office Presentation on the Idaho Ethics in Government Act & Open Meeting Law**

Lisa O'Hara gave a presentation from the Deputy Attorney General's office at DEQ. She said, "We are here to assist DEQ and the TGC, as well as provide continuing education on any upcoming issues." After the presentation Lisa O'Hara reminded those in attendance the Attorney General's office is here to assist TGC members. Lisa O'Hara welcomed TGC members to visit the Attorney General's office on the second floor of the DEQ state office building.

Idaho's Ethics in Government and Open Meeting Laws

Lisa O'Hara
Deputy Attorney General,
Department of Environmental Quality
September 7, 2017

Ethics in Government Act

Idaho Code § 74-401, *et seq.*

- What is the purpose of the Act?
 - To protect the integrity of government.
 - To assure independence, impartiality, & honesty of public officials.
 - To inform citizens of the existence of personal interests which may present a conflict of interest.
- Who does the Act apply to?
 - "All public officials" including...
 - Any person holding public office of a governmental entity by formal appointment.
(This includes TGC Members)

- What does the Act prohibit?
 - A public official from taking official action *or* making a formal decision or recommendation,
 - where he has a *conflict of interest*,
 - **and** has failed to disclose that conflict as required under the law.

- What is a "conflict of interest"?
 - Any action/decision/recommendation,
 - in capacity as a public official,
 - that would be to the **private pecuniary benefit**,
 - of the public official, a member of his household, or a business that he (or household member) is associated with.

- What should a public official do if he believes he has a potential or actual conflict of interest?
 - DISCLOSE the conflict:
 - (1) Written statement describing matter to be acted on *and* the nature of potential conflict;
 - (2) provide the statement to appointing authority (the Director).
 - May seek legal advice from independent counsel or AG's office prior to disclosing.
 - Disclosing the conflict does not affect his ability to determine quorum or debate/vote on matter.
 - Recusal is an option but not required.

Open Meeting Law

Idaho Code § 74-201, *et seq.*

- Idaho's Open Meeting Law applies to:
 - A meeting,
 - of a governing body of a public agency,
 - to *make a decision or deliberate toward a decision* on any matter.

- **Meeting defined**
 - Convening of a governing body to make a *decision or deliberate toward a decision*.
 - Deliberation is the *receipt or exchange of information or opinion relating to a matter pending before the agency for decision*.
 - *Excludes* informal or impromptu discussions of a general nature not related to a matter pending before the agency.
 - But *includes any* receipt of information related to a decision.
 - Decision is any determination, action, vote or final disposition on which a vote is required and a quorum is present.
 - Whenever there is a quorum of a governing body meeting to deliberate or make a decisions, even if informal or social in nature, the open meeting law applies

- **Governing Body defined**
 - Members of any public agency
 - which consists of 2 or more members
 - "with the authority to make decisions for or *recommendations* to a public agency."
 - This includes advisory committees, boards, and commissions.
 - "Public agency" includes subagencies created by statute, ordinance, or legislative act.

- What does the Open Meeting Law require?
 - Meeting Notice (5 or more days in advance) and Agenda Notice (at least 48 hours in advance).
 - Held in a place that does NOT discriminate on the basis of race, creed, color, sex, age or national origin.
 - Taking, and posting, of written minutes.

APPENDIX B

9:45 AM **Technical Guidance Manual Section 4.19.3.4 Dosing Chamber**

- Review for final approval

James Craft stated no public comments were received, and that DEQ made a few adjustments to the section to eliminate repeated sentences. In addition, there were some minor formatting changes within the section. Mike Reno asked for clarification on why the TGC member’s handouts had red track changes instead of the colors seen on the digital version shown on the screen. James Craft said that was a printing issue from a different user accessing the file.

Motion: Mike Reno motioned for final approval.

Second: Kellye Eager

Voice Vote: Motion carried unanimously. Section 4.19.3.4 Dosing Chamber will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

APPENDIX C

9:49 AM **Discussion on draft changes to TGM Section 4.8.2. Approval Conditions**

- TGC to discuss proposed changes to condition number 4 for ETPS annual effluent monitoring and reporting requirements that do not agree with other sections in the TGM.

James Craft commented, “There is confusion coming from the health districts about the ETPS annual reports and the required effluent testing needed for the reports to meet the requirements in TGM section 4.8.2. The discrepancy comes from TGM section 5.13, Table 5.14 regarding products installed for reduction of total nitrogen <27 mg/L and subject to effluent testing (TGM section 4.8). James Craft asked for the committee member’s thoughts and if we needed to change this section to clear up the discrepancy. Kellye Eager said, “We need to.” James asks Alan Worst if this related to his public comment.

Alan Worst said his comment request regards nitrogen policies and subdivision approvals with 16 mg/L ETPS. Alan Worst states, “There have been various discussions about the responsibility of DEQ and equipment providers. Is this sensible to approve at that low of a total nitrogen limit, consistently given the nature of the nitrogen process?”

James Craft led the discussion of what and when to sample, what should be in the TGM as far as requirements, and what do we want to see in annual reports when submitting sample results.

Mike Reno agreed with the proposed changes made to section 4.8.2 and said that it would clear up the confusion. Jason Peppin recommended changing the text in a way that tied it to permitting, allowing more clarity for permit conditions on a specific sites. Jason Peppin said, “We have quite a few areas where the site alone requires an ETPS unit.” James Craft made changes to Section 4.8.2 to include “or as specified in permit conditions” in regards to if ETPS effluent testing is required or not under permit conditions.

In referring to Alan Worst’s comment, Joe Canning asked about NP studies and said, “Consultants put down and use a target number they are trying to meet, and that this puts an unreasonable burden on a septic system, I think that is getting more towards Alan Worst’s question.” Alan Worst said, “If staff could plug in a number, DEQ needs to have better education on what they need/can enter. It is a lot easier to have effluent limitations set at 20 mg/L than 16 mg/L. It can make a big difference.” Discussion continued on re-running nitrogen models and the problem with who paid for that type of work.

Motion: Mike Reno moved for preliminary approval for Section 4.8.2 as amended.

Second: Jason Peppin

Voice Vote: Motion carried unanimously. Section 4.8.2 Approval Conditions to be posted for 30-day public comment period.

APPENDIX E

10:00 AM Product Review: Infiltrator ATL Design and Installation Manual

- Discuss feedback from Infiltrator based on DEQ's recommendations and requests to modify installation manual.

James Craft mentioned DEQ did receive public comments from Presby. The revised Infiltrator ATL manual was discussed by TGC along with specific comments raised in Infiltrator's response letter to the DEQ initial review and comment letter sent on June 9, 2017:

DEQ Letter Review #11, Infiltrator ATL Design Manual Page 8 Bed Configuration:

James Craft said, "The concern here is the maximum separation distance from the ATL conduit row to edge of trench." Dick Bachelder was invited to sit with the TGC members for further discussion.

James Craft, Mike Reno and Dick Bachelder began discussing the concern about maximum separation spacing and referred to the diagram on page 9. There was confusion on the interchanging of terms "trench" and "bed" being used. Mike Reno cleared up the confusion saying anything wider than 6 feet is a bed.

Dick Bachelder stated he agreed with Mike Reno. Dick Bachelder stated, "There are two issues, a storage capacity issue, which is a real issue, and a spacing issue. Dick Bachelder commented about DEQ's comment regarding spacing from edge of bed to ATL conduit not be limited to 18 inches. Mike Reno said, "The Rules and Guidance on absorption beds say 1-3 feet. James states, "Okay so that is consistent with the rule." Mike Reno and Dick Bachelder agreed, "Yes".

DEQ Letter Review #13, Infiltrator ATL Design Manual Page 4 Effluent Distribution:

James Craft said, "The Infiltrator manual makes reference to hooking up to a pressure distribution but it was not tested under these conditions."

Dick Bachelder said, "The ATL conduit is approved for pressure but not tested anywhere under pressure." Dick Bachelder asked for a reason from DEQ on why the use of pressure pipe is not allowed. James Craft responded that because the ATL conduit was not tested under pressure during NSF 40 testing. Dick Bachelder described the ATL conduit as a 12" diameter bundle made with 4" diameter drainage pipe with holes at 360 degrees. The holes are drilled to engineered specifications. Infiltrator is not seeing a downside to putting a pressurized pipe in the ATL bundle. Dick Bachelder commented it would be expensive to retest the ATL system under pressure.

Mike Reno asked Dick Bachelder if Infiltrator puts effluent out under pressure, would you lose any treatment capability in the bundle. Dick Bachelder replied, “Good question, chances of a blast coming out of the bundle are pretty limited as well as the impact you are suggesting. We don’t see that occurring.” Joe Canning was concerned that pressurizing the ATL bundle is a deviation from NSF test. Dick Bachelder commented that Joe Canning had vast professional experience and asked him for potential negative impacts. Dick Bachelder said, “The bottom of the system sand is written as NSF standard, and claims about where actual treatment of effluent happens is subject to debate.”

Mike Reno said, “We have held standards to NSF testing at this point and could not allow product approval without it.” Dick Bachelder said, “Infiltrator will concede temporarily and ask NSF if they would be willing to certify the results when the ATL conduit is pressurized.” Mike Reno said, “We rely on NSF testing. If NSF submits something in writing to DEQ, we could allow pressure application.” James Craft told Dick Bachelder, “If NSF were to certify pressurizing the ATL conduit, more detail is needed on how a pressurized system would be installed.” Mike Reno commented that orientation of emitters would need to be up instead of down. Joe Canning mentioned finding a typo on page 9, and asked for a diagram clarification on page 8. James Craft said the diagram was crossed out, and Dick Bachelder said the typo has been fixed.

DEQ Letter Review #19, Infiltrator ATL Design Manual Page 8 Bed Configuration-Plan View:

James said, “Is the ATL pipe designed so that one pipe is filled with effluent before going to the next pipe? I want to have a blurb in the manual about having a distribution box to make sure the flow is distributed evenly throughout the system.” Mike Reno said, “Do we require a distribution box on anything else with just two pipes? I don’t think we require it for anything else.” James Craft asked TGC members on whether or not the ATL installation manual needed to include instructions about installing a distribution box. Dick Bachelder said, “My response is, and I feel strongly about this. The ATL system is nothing unique. I am trying to keep the manual to 24 pages. We are willing to consider complying with the request but want to understand why.” James Craft said, “It is a concern with even distribution of effluent between ATL conduits.” Dick Bachelder said, “We agree with the concern, we do not have to do this in other states. We are just reinforcing what you do in your TGM. All drawings include a distribution box. What do you want to say and I will put it in the manual.” Mike Reno said, “Say distribution box is recommended for installation.” Jason Peppin commented the TGC required the Presby AES system to have a distribution box. Dick Bachelder said he will send a revised draft of the installation manual to the TGC for further review with the TGM reference for a distribution box. Kellye Eager cited the TGM reference, 3.2.5.2 for Distribution box for Dick Bachelder.

Infiltrator ATL Design Manual Page 4 Sand Extensions:

James Craft asked for a clarification on the end of ATL conduit pipe spacing requirement for system sand and whether it is maximum or minimum 12 inches. Dick Bachelder commented there should be no more than 12 inches at the end of the ATL conduit. More

discussion involved leaving the spacing at 12 inches because that is how the ATL bundle was NSF tested.

DEQ Letter Review #20, Infiltrator ATL Design Manual Page 8 Bed Configuration:

Dick Bachelder asked TGC for clarification on DEQ's comment #20. Mike Reno suggested referencing the TGM section on vertical separation distances to limiting layers. Dick Bachelder said, "The manual references this TGM section by adding a paragraph on page 4." James Craft commented that he appreciates Infiltrator keeping the manual simple and easy to read. Joe Canning cautioned when referencing TGM sections as the TGM is often updated and sections numbers change. This may lead to changing the ATL design manual for every TGM change. Dick Bachelder suggested saying, "Use current TGM edition" in the requirements of the ATL installation manual and that the specific language will be worked out with James Craft.

Jason Peppin commented that the ATL installation manual does not reference the minimal installation depth. Dick Bachelder inquired if this installation depth is in reference to the capping fill application. Dick Bachelder commented that the capping fill application is Idaho specific and that he has never heard of that term before coming to Idaho. Other states use terms like "mound". Dick Bachelder asked for clarification on where the vertical separation is measured from. Mike Reno said, "It is measured from the base of the system sand. Dick Bachelder asked the TGC to make sure that Infiltrator is treated fairly as other competitive systems. Mike Reno replied that it was a fair request. Mike Reno also talked about the above-grade capping fill requirements for a pipe to be 3 inches below native grade. This is a current design issue with DEQ that is yet to be resolved. Dick Bachelder said, "ATL systems are going in above-grade all around the country."

DEQ Letter Review #21, Infiltrator ATL Design Manual Page 9 Notes: Number 3:

James Craft said venting will need to be addressed for pressurized systems. Dick Bachelder agreed.

DEQ Letter Review #25, Infiltrator ATL Design Manual Page 13 Design Example:

Dick Bachelder said Infiltrator values the term "system sand" in the diagram. Mike Reno suggested not changing the diagram and make reference to medium sand. Joe Canning said the installation manual makes reference to the term "system sand" and specifies the sand material by making reference to the TGM.

DEQ Letter Review #29, Infiltrator ATL Design Manual Page 24

The interpretation of the diagram showing the raised connection was discussed. Dick Bachelder said, "The objective is to fill the ATL conduit before moving to the next row. The second diagram of the raised connection will need to be revised to reflect this objective." Dick Bachelder further explained from a manufacturing perspective we want to maximize first row but not fill it chock-full. Mostly we are concerned about air, for the aerobic conditions." Joe Canning asked how the ATL was tested. Dick Bachelder said, "It

was never intended to maximize effluent in the conduit line. Experience is air is a good thing. We won't use serial distribution unless on a slope." James Craft asked for examples of where serial configuration was used on the ATL system and if there was any field data to support it. Dick Bachelder replied that Infiltrator has longevity information for the ATL system but that is a couple years old. Dick Bachelder would share that data with DEQ but is not confident in what we will learn with those longevity studies. Dick Bachelder said, "Yes the ATL systems are working, to answer the question. I can get data on field experience."

Dick Bachelder stated that ATL was tested with NSF using a vent – a pipe connected to the distal end of each row was manifolded into a four inch vent pipe.

James asked the TGC if this is the data they want to see. Mike Reno and Joe Canning asked, "Is this hydraulic or treatment data?" Dick Bachelder said, "It's hydraulic."

Mike Reno said, "We don't make distinctions in anything else with parallel or serial systems." Joe Canning said, "What is the difference between that and a sand trench, nothing, other than it is NSF tested." Jason asked if all configurations for Presby been considered and tested for NSF as well? Fred Vengrouski with Presby commented (via telephone), "We did provide a considerable amount of comprehensive data to support configurations along with NSF data. We provided serial and parallel data." Mike Reno asked James Craft to look further into the Infiltrator data.

10:55AM Meeting break.

11:05AM Meeting Resumed

James Craft asked for any additional comments on DEQ's review and comment letter. No additional comments were given.

Note: Lunch Break was delayed until after the Oscar LOWeFLOW agenda item.

11:06 AM Presby Letter September 6, 2017 read into minutes

Norm Semanko, attorney representing Presby, read the Presby letter from Lee Rashkin dated September 6, 2017 into the minutes.



Presby Environmental, Inc.

The Next Generation of Wastewater Treatment Technology

143 Airport Rd., Whitefield, NH 03598
Tel: 800-473-5298 Fax: (603) 837-9864
www.PresbyEnvironmental.com

September 6, 2017

VIA EMAIL

James Craft, Onsite Wastewater Coordinator, DEQ
Chairman, Technical Guidance Committee
Idaho DEQ State Office; Water Quality Division
1410 N. Hilton
Boise, ID 83706
james.craft@deq.idaho.gov

RE: Comments on Infiltrator Water Technologies' Request for Approval for Use
ATL (Advanced Treatment Leachfield) System

Dear Mr. Craft:

Please consider and read the following comments into the minutes at the September 7, 2017 Idaho TGC meeting regarding Infiltrator Water Technologies' (Infiltrator) continuing efforts to seek approval for their ATL product in Idaho.

Below is a summary of our concerns with Infiltrator's Request for Approval of the ATL System. Please also take into consideration the concerns we have raised previously in writing and at TGC meetings.

Technical Inadequacies

Infiltrator's request for approval and accompanying Design and Installation Manual reflect design parameters that have never been tested and deviate from its NSF Standard 40 certified models. The ATL System has never been tested in the configurations that are being requested for approval in Idaho.

(Norm Semanko commented, "You have discussed some of that today.")

The Infiltrator ATL System has only one NSF certified model that reflects their three-bedroom configuration. Infiltrator has never undergone an NSF engineered review to certify flow rates other than for a three-bedroom house.

Product Amount / Loading Rates

(Norm Semanko commented, "You might look at #16 in June 9th letter.")

The Infiltrator ATL System is not tested or proven to work at 50 linear feet per bedroom. ATL's NSF Standard 40 certification is for 70 linear feet per bedroom and all state approvals for the ATL system require 70 feet per bedroom.

(Norm Semanko commented, "I would like to emphasize Presby was tested and approved at 50 feet. It is not

appropriate to tie what Presby did to Infiltrator. Not sure how numbers got put in the letter.”)

Absence of Field Data

Since Infiltrator does not have the extensive field data and additional testing previously required of similar products in Idaho, ATL should go through the provisional approval process. During our submittal process, informed parties insisted, and DEQ required, a minimum field data threshold of multiple systems for a significant length of time to be consistent with technology new to Idaho. *(Norm Semanko commented, “You have touched on that today.”)* Specifically, R.C. Worst, in its letter to the TGC dated February 3, 2016, stated that:

We feel it would be inconsistent and irresponsible for the committee to approve loading rate and soil separation reductions for a technology with no proven track record in the State. In order to maintain reasonable consistency, it would be our recommendation to require 30 systems and 3 years testing to maintain performance validation methods currently required of other technologies.

(Norm Semanko commented, “The standard was met and surpassed by Presby. We ask that DEQ treat people the same and consistent between products and go under the same rigor.”)

Unproven Technology

The ATL product has little field history and virtually no established track-record in the onsite septic market. During the May 18, 2016 TGC committee meeting Dick Bachelder personally stated that when their ATL product was tested with 6 inches of sand beneath the pipe and loaded at 2.1 gallons per linear foot the product exceeded NSF 40 performance standards but that **he could not verify how long their ATL product would last at that loading rate**. This statement alone should support the Idaho DEQ requirement for Infiltrator to provide field data for ATL to go through the provisional approval process.

Conclusion

We feel that, if DEQ considers this application, it must be in accordance with NSF Standard 40 Certified models, with pipe amounts used with other approvals, in parallel distribution, and must undergo the provisional approval process of obtaining field data. Given that ATL is a recent introduction to the marketplace, it would be impossible for them to have the field data that TGC has required of other innovative technology.

(Norm Semanko starts reading here, and skips the above paragraph.)

DEQ has an obligation to supervise the actions of the TGC to foster a policy of open, and as a result honest, government. *(Norm Semanko commented, “I appreciate the Deputy Attorney General’s office review on that today.”)* To be consistent with requirements imposed on competing technology, and to avoid an arbitrary and capricious review, any approval of the ATL System must require:

- Only NSF-certified configurations (3 bedroom systems, in parallel distribution);
- A minimum of 70 linear feet per bedroom to be consistent with its NSF testing and other state approvals;
- Substantial field data to be able to circumvent the performance validation methods currently required for other technology; and
- Storage capacity calculations.

Sincerely,

A handwritten signature in black ink, appearing to read "Lee Rashkin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lee Rashkin
Vice President

CC: Attorney Semanko, Parsons Behle
Tyler Fortunati, REHS, IPDES Compliance, Inspection, and Enforcement Lead, DEQ
Barry Burnell, Water Quality Division Administrator, DEQ

(Norm Semanko commented, "Regarding data, I know what was submitted and requests DEQ provide guidance as to not share trade secrets." Lee Rashkin via telephone commented, "Regarding the serial and parallel comments, we went through an extensive review process. We had to substantiate our manuals, this doesn't relate to other technologies. The infiltrator comment is not appropriate. NSF testing venting should be included. Referencing Presby without substantiating their own merit is inappropriate.")

James Craft asked TGC members for any comments on the Presby letter.

Mike Reno said, “A proprietary wastewater treatment product manual may undergo the same approval process. ATL needs to be held to the same standards as Presby and require the same level of confidence in testing for ATL.” James Craft asked, “Still go with proprietary route but consider provisional testing?” Mike Reno replied, “Whatever Tyler required Presby to submit to circumvent that provisional process, we need to require the same.” James followed with, “DEQ will internally review that data.” Lee Rashkin (via telephone) said, “Our system was NSF certified with 6 inches of system sand, however Presby AES system utilizes 12 inches of system sand, because that is what we were able to provide significant data for.”

Dick Bachelder commented that he is fearful of term “same” because of the wide interpretation, and that Infiltrator does not have the same data as the competitor. Dick Bachelder asked to clarify what is meant by “same”. Mike Reno replied, “I want to restate that as the same level of information. The framework of comparison is from the TGM, not another application. That is not fair and not right.” TGC members agreed.

Dick Bachelder summarized and commented that venting needs to be looked at on its own merits. The loading rate at ATL tested 2.2 gallons of linear foot conduit of pipe. Protocol is 150 gal/day loading rate. We used 210 feet. (He explained how they came up with 2.178 gallons and that they round to 2.2 gallons). In each bedroom we are calling for an additional 50 ft. The comment posed concerning longevity was addressed by Dick Bachelder, “I don’t know how long these are going to last, I don’t know anyone who knows how long they will last. I will bring field data, but that will not tell you how it will last 30 years from now.”

Mike Reno suggested TGC table this review until field data that is forth coming arrives and DEQ evaluates that with TGM requirements for approval. Dick Bachelder said, “I will offer to submit an addendum and a revised copy of the installation manual and will see you in December to wrap it up.”

Motion: Joe Canning moved to table the Infiltrator manual review until DEQ reviews additional information sent by Dick Bachelder.

Second: Kellye Eager

Voice Vote: Motion carried unanimously. TGC will revisit the Infiltrator product manual review after DEQ reviews additional information.

APPENDIX D

11:28 AM Product Review continued: Presentation by Dave Lowe of OSCAR LOWeFLOW Treatment System Design Manual for Idaho

- Dave Lowe from Lowridge Onsite Technologies, LLC is seeking pre-approval as a proprietary wastewater treatment product. Additional comments noted on slides.



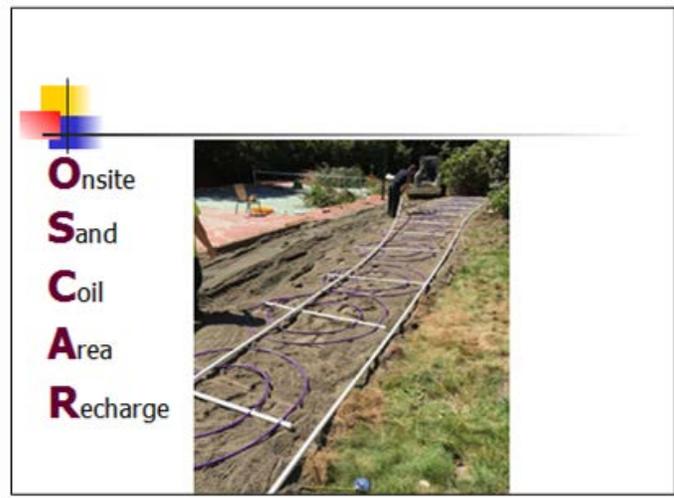
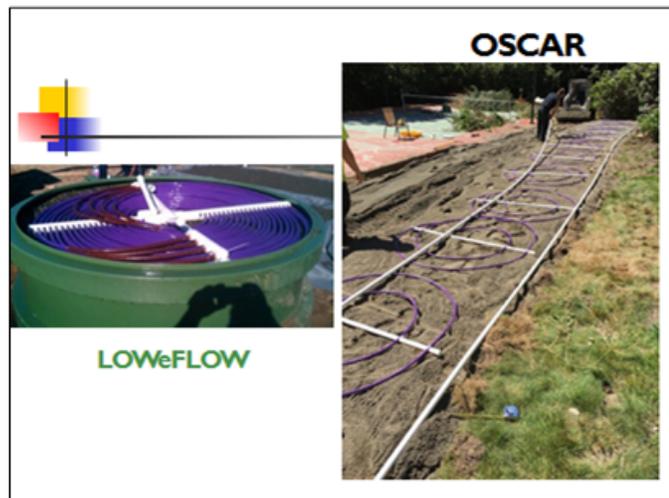
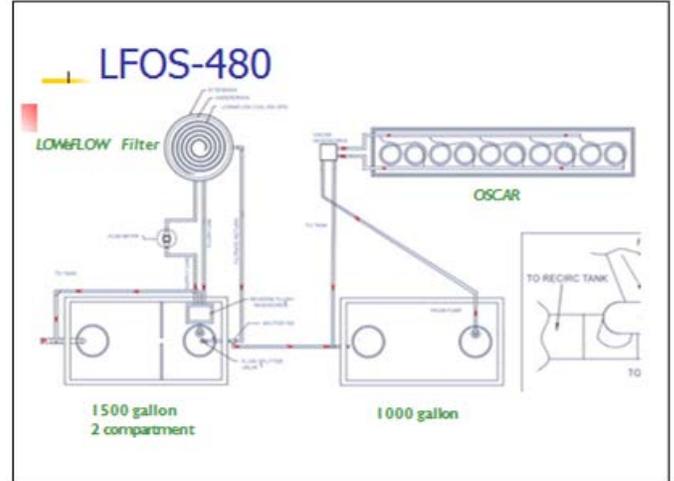
Seeking Approval

- Proprietary wastewater treatment product
- LOWeFLOW = recirculating filter
- OSCAR = single pass bottomless ISF

Dave Lowe said, "Understand manuals are in draft form today."

Outline

- What is OSCAR-LOWeFLOW?
- Treatment capability- NSF
- With time allowing, other.



Dave Lowe said, "LOWeFLOW has 400 feet of tubing. Oscar coils are single pass, 50 gal per day criteria, 5' by 5' system. 100 gal per day criteria 7' by 7' sqft. It is same but with a bigger foot print.."

What is OSCAR?

Proprietary Technology:

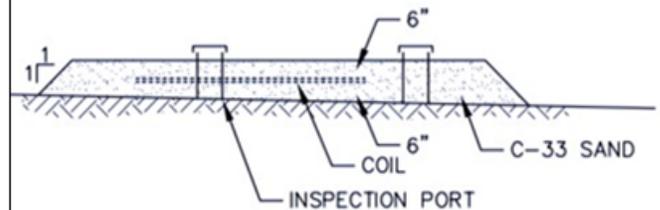
- Treatment unit (fecal coliform)
- Final disposal component

Two Components of OSCAR

- 1. Pre-assembled drip coils
Each coil =
50 or 100 gpd
- 2. ASTM C-33 sand
6" depth under coil



OSCAR Side View



Dave Lowe said, the coil is not elegant but functional, and the bracket is to keep it in its shape.

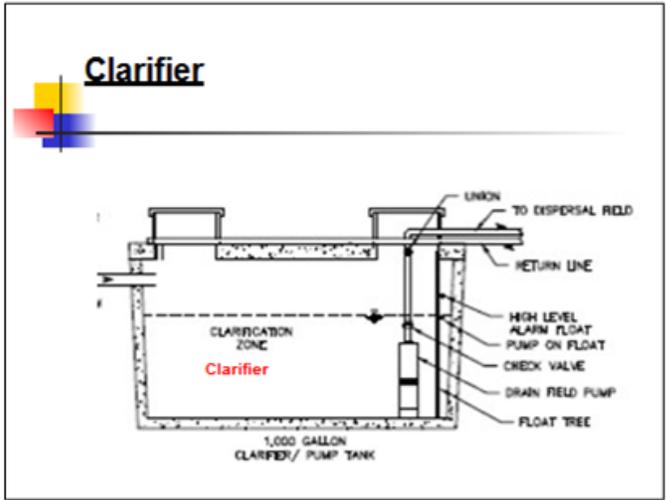
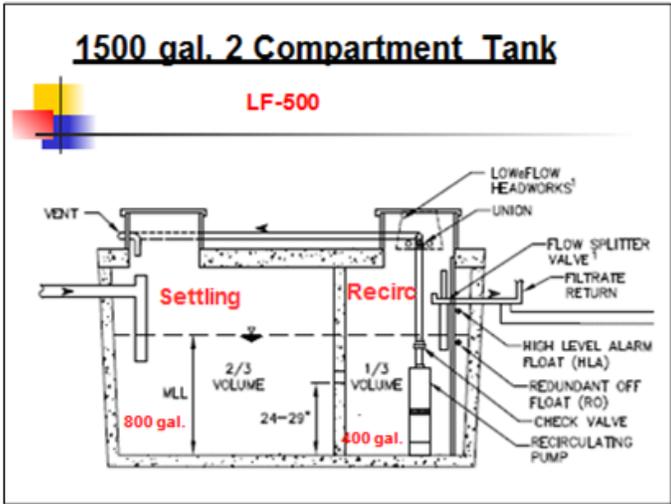
LOWeFLOW



Tank Functions

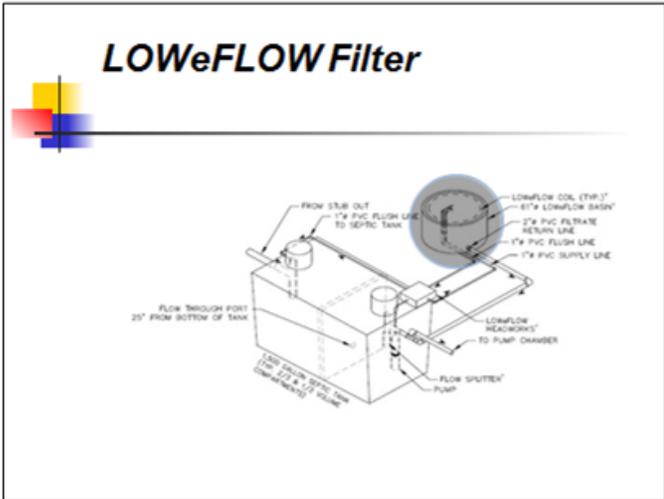
- Settling (septic)
- Recirculation
- Clarification
- Dosing (discharge)

Dave Lowe said, "LOWeFLOW is an organic removal treatment unit"

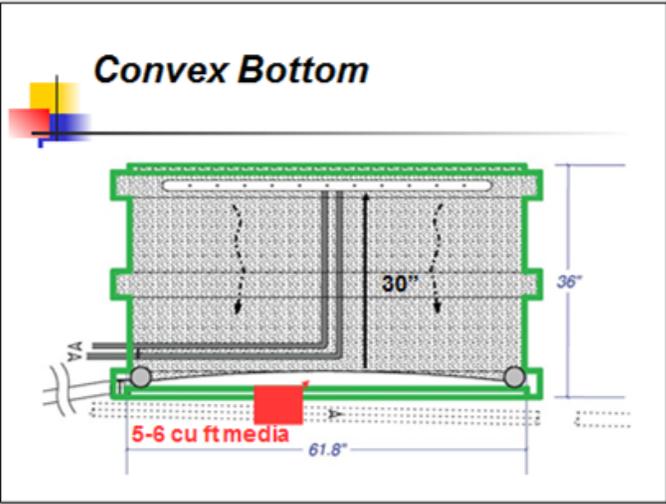


Dave Lowe mentions, "looking for a 4:1 ratio"

Dave Lowe mentioned, "Emergency storage is configured in other tank."

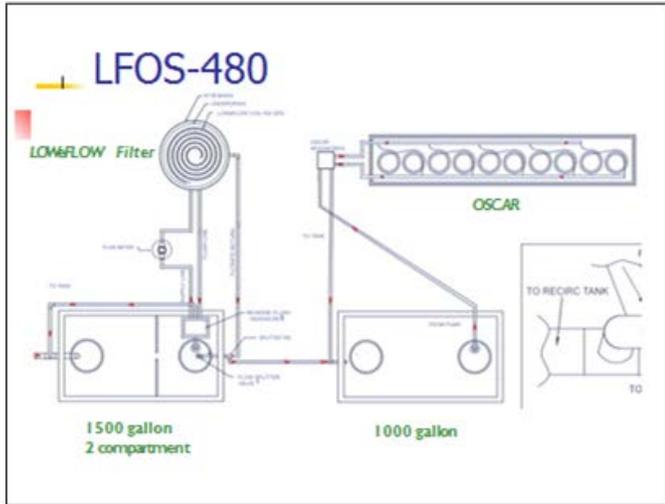


- ### Filter Basin and Coil
- 500 gpd poly basin
 - LF-500 Coil
 - Media: Growstone: recycled glass



Dave Lowe mentioned they use synthetic media exclusively now, and this media is similar to a pumice stone.

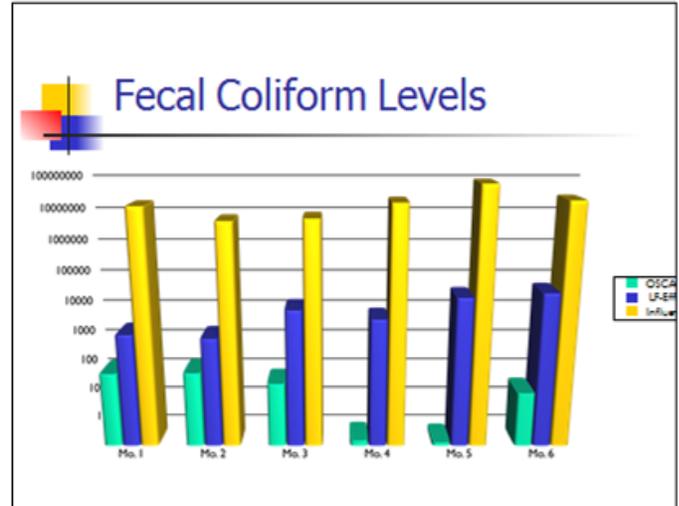
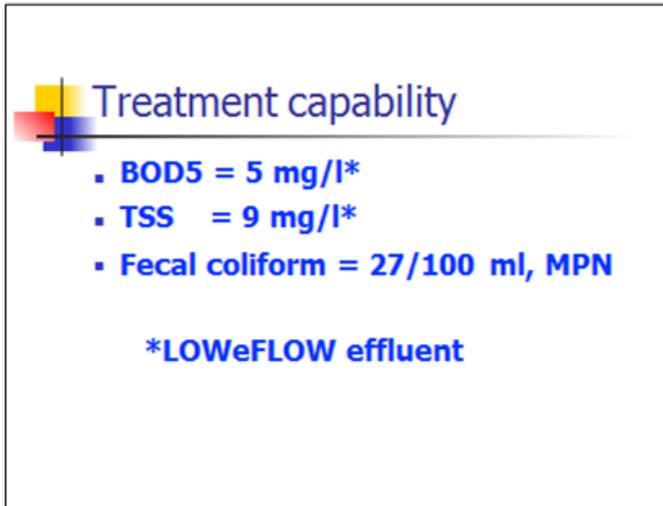
Dave Lowe talked about the bottom of the mold. He said, "Originally the mold was made for easy stacking and for efficient shipping but that gave it a loose bottom. So they made changes to a convex shape to have flow off to the outer edges and fix the loose bottom. Liquid leaves through one outlet via a welded port." Mike Reno asked how many gallons a day the LOWeFLOW filter was designed for, and Dave Lowe said it is 500 gal/day.



Dave Lowe mentions it is normal to have the wet marks showing.



Dave Lowe said, "There is only sand on top of this. The grass is growing on liquid and nutrient from effluent out of the Oscars. I see this as good growth pattern after one year. You could run a riding lawn mover over this site, as far as firmness of the ground."



Discussion after the presentation:

Dave Lowe mentioned there were two NSF reports and provided additional report details regarding, treatment capability, testing parameters and results.

Dave Lowe also mentioned in regards to fecal coliform levels there was a 6 month spike on the NSF report graph because of the 4 stress tests. The last test was during vacation mode, so the system was shut down for a week or so. Dave Lowe explained when effluent is put back in after vacation mode it will cause that spike and that you need to keep the bacteria fed to avoid a spike.

Mike Reno asked, “Was the LOWeFLOW meant to be without the Oscar component? Or did the Oscar component test add to the LOWeFLOW design? Was this design just for treating fecal coliform?” Dave Lowe answered, “Yes, the Oscar uses sand versus a UV lamp to reduce fecal coliform.”

James Craft asked a question regarding the NSF report saying it is not an NSF certified treatment system because Lowridge has not been audited by NSF and the alarm panel has not been evaluated for compliance to Standard 40. Dave Lowe said, they opted not to do that and Washington State does not require a NSF certification process. Washington relies on the NSF data. LOWeFLOW could pursue the NSF audit by using a sub-panel for the alarm on the system along with paying fees. James Craft stated the system needs to meet NSF standards/approval according to TGM.

Mike Reno asked a question regarding what size of rock was tested and if it was 3/8 inch. Dave Lowe said, “Yes, 3/8 inch. It is a nightmare to try and get consistent 3/8 wash rock material from the pit.” Dave Lowe discussed finding silts when using 3/4 inch concrete aggregate. Dave Lowe said, “They have gone back and forth on media

issues with states and we have one more month of testing. Data will be available after the testing. Dave Lowe mentioned NSF is validating rock without additional testing.

Kellye Eager inquired if the Growstone media used in the system was hard to come by. Dave Lowe said the Growstone is readily available through the distributor and comes in two large bags as part of the kit for the installer. Kellye asked, "How often does the Growstone need to be changed?" Dave Lowe said, "It should be never, but not more often than any other media. The longest LOWeFLOW in service was done in 2012 on a 4-plex residential building and the effluent was reported clear. Dave Lowe said there is more experience longevity wise with the LOWeFLOW than the Oscar, but with the Oscar that is the least of his concerns.

Mike Reno asked Dave Lowe what he was proposing for approval. Dave Lowe said, "He wants approval as one complete unit today, the Oscar with the LOWeFLOW."

Mike Reno said, "There is an issue with the septic tank portion. A thousand gallon septic tank is the requirement for Idaho. To get approved in Idaho the system might have to put in a septic tank prior to install." Dave Lowe used the LFOS-480 PowerPoint presentation to discuss the comment and said, "We would have to separate the 1500 gallon tank into a 1000 gallon and 500 gallon tank." Dave Lowe mentioned the cost is lower with one tank, and that he would push for this arrangement. James Craft mentioned that tanks used in Idaho must be an approved tank listed in the TGM. Dave Lowe agreed and stated the installation manual can specify that requirement.

Mike Reno asked Dave Lowe for any field testing data. Dave Lowe said there is no field testing data. Mike Reno explained that based on DEQ's policy, lacking field testing data requires going through the provisional approval process. Mike Reno gave explanation on the ETPS general and provisional approval process. James Craft added that Dave Lowe would need to develop a QAPP and have a 3rd party submit and conduct sampling. Dave Lowe asked if fecal coliform levels are an issue for Idaho. Mike Reno said it was not, and the TGC led more discussion on the process of approval. Dave Lowe is thinking about seeking two different approvals and explains why using a diagram. Discussion amongst TGC members and Dave Lowe occurred about terms and soil differences in Washington State versus Idaho. James Craft added that Dave Lowe would need to get 90 data points, 30 systems tested each year.

Alan Worst commented from the audience and asked the TGC why LOWeFLOW is considered under the proprietary category. Alan Worst pointed out a discrepancy on why the Orenco Advantex system was considered under the proprietary category. Alan Worst stated to put both LOWeFLOW and Advantex in proprietary or both as extended treatment package system. Mike Reno explained that the mechanical components in the LOWeFLOW system make it proprietary. Dave Lowe said, "We

are not in any disagreement with Alan Worst's comments and we want to be considered for proprietary approval. Mike Reno thanked Alan Worst for bringing that up. Joe Canning and Dave Lowe clarified questions on a diagram regarding flow and discussed the need for operations and maintenance to ensure the system functions properly.

Dave Lowe explained the process for certifying installers under his company. Dave Lowe said that certified professionals are listed under his website and provides training videos for the installers. Dave Lowe further explained the field training component for installers. Dave Lowe said that once the installers finish the electrical work, he visits the site to do start up procedures with the installers. Mike Reno discussed Idaho's installer requirements. Dave Lowe reassured TGC that Dave Lowe conducts his training and also tells the installers that it does not preclude them from local requirements.

Mike Reno recommended tabling this discussion until DEQ receives and reviews the required data from Dave Lowe. Joe Canning agreed. Dave Lowe asked the TGC to clarify what the actions items were for the approval process. The TGC collectively summarized the following 1. Have the NSF data, 2. Submit the field test data, 3. Have a new design showing exactly what is requesting to be approved; i.e., LOWeFLOW with or without the OSCAR, 4. Design manual criteria, 5. Your manual specific to Idaho, not Washington, using Idaho loading rates, 6. Label diagrams and figures in the manual. Dave Lowe agreed on the action items needed to continue the approval process.

Motion: Joe Canning motioned to keep Mike Reno's previous suggestion and table this topic until submitted data is received.

Second: Jason Peppin

Voice Vote: Motion carried unanimously. TGC to table further review of the Lowridge OSCAR LOWeFLOW product until the requested information is sent to TGC and DEQ.

12:30 PM Meeting adjourned for a 1 hour lunch break

1:30 PM Meeting resumed

APPENDIX F

1:30 PM **Old Business**

Gerald R. Williams Engineering Letter dated June 6, 2017

- TGC discussed Mr. Williams' request to have Presby AES systems engineered.

James Craft requested Norm Semanko to read Presby's comment letter dated 9-7-2017 into the minutes. Norm Semanko read the letter.

James Craft asked for any comments to the Mr. Williams' letter. Mike Reno commented, "The statement, 'AES systems is the only solution,' is incorrect." Mike Reno explained there are other systems and options. Designing the drainfield system is the same process no matter what type system is installed. The Presby AES system design installation manual allowed the pipe to be installed 9 inches above natural grade, which is more similar to mound than capping fill system. The issues with the Presby AES system are based on application use and how the design manual has been approved for these applications.

Joe Canning stated the drainfield is different; it is a matter of proper bookkeeping when designing. Joe Canning does not believe engineering is necessary. Kellye Eager agreed with Joe Canning and mentioned some installing complications with the Presby AES system is no different than in other systems. Kellye Eager said her health district staff have inspected system installations and are pleased with the outcome. Kellye Eager said her district has not seen any issues with Presby AES system from not being engineered.

Action: Mike Reno asked DEQ to check with the engineering board to determine if designing the Presby AES in above-grade capping fill applications would be crossing any engineering lines.

James Craft said DEQ would verify with the engineering board if any engineering is required when the Presby AES is used in above grade applications and will report back in a future TGC meeting.



Presby Environmental,

The Next Generation of Wastewater Treatment Technology

143 Airport Rd., Whitefield, NH 03598
Tel: 800-473-5298 Fax: (603) 837-9864
info@presbyeco.com
www.PresbyEnvironmental.com

Technical Guidance Committee
Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

RE: PEI Response to Gerald Williams, P.E. "Recommendation for AES Systems to be Engineered"

Dear Committee Members,

I am Don Prince, Technical Advisor here at Presby Environmental. Commenting on behalf of Presby Environmental, Inc. (PEI), I appreciate the opportunity to respond to the comments by Gerald R. Williams, P.E. concerning his "Recommendation for AES Systems to be engineered" that were read into the record of the Technical Guidance Committee meeting on June 8, 2017.

Mr. Williams states he has designed a number of Presby Advanced Enviro-Septic (AES) systems and, from his experience, speaks highly of the technology. However, it is our opinion that his request to the TGC to require Presby AES systems to be engineered is problematic. This is based on both the reasons he has given as justification, and, more importantly, the conflict of interest that is presented by the potential loss of business to his firm with any expansion in the amount of systems not required to be engineered. It is understandable that Mr. Williams see a threat to his business and is looking for ways to minimize the impact.

It is well-known that the introduction of new technology inevitably causes some level of disruption to the status quo of the marketplace. This disruption may cause long-standing practices to be re-examined and adjusted as needed with the potential to lose business in one sector and gain in others. The consumer, who foots the bill for everything, drives the move for better, more efficient technology and the approval process ensures new technologies do not pose a threat to public health or mislead consumers with inferior performance.

Mr. Williams has given a number of reasons for justifying that any septic system designed with the Presby Advanced Enviro-Septic technology require the services of an engineer. I would like to quickly respond to them here:

- Mr. Williams says the AES system is expensive and therefore would only be used for "extreme environmental conditions". With well over 20 years of experience, this has not been the case in other markets. When starting out in a particular market, sometimes challenging conditions will drive a designer/installer to try a new technology. However, familiarity, reliability and ease of construction combine to drive designers/installers to use our technology for all types of systems. The Presby AES system is actually a very economical, third-party certified, secondary treatment system. Educated consumers gladly pay a little more when they understand the reliability that is realized by a system that treats the wastewater before releasing it to the native soils.
- Mr. Williams counts manual pages to demonstrate the complexity of the Presby AES technology. This is not a valid means of comparison. The Presby AES technology is far from complex and uses many of the very same skills and design concepts from the well-known conventional technology, including septic tank primary treatment, gravity distribution and even the same pump system as conventional, if needed to gain elevation. To assert this technology is as complex as a sand mound with pressure distribution is not accurate and we wholeheartedly disagree with that assertion.



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- Mr. Williams argues Vertical Design, Contractor Coordination and Timing issues will be insurmountable without the involvement of an Engineer on projects which utilizes Presby AES technology. Again, with well over 20 years of experience in other markets, the vast majority of which do not require an Engineer to be involved in the design process, we have found that contractors quickly adjust to changes in the marketplace to coordinate effectively. To insinuate that hand-holding by an engineer is required to avoid the scenarios outlined in his letter undermines the credibility of the contractors he is referring to, especially in view of the fact that this coordination is routinely accomplished in other parts of the country.
- Lastly, Mr. Williams asserts that for “environmentally tough conditions”, all options should require an engineered system. The Presby AES system is the only solution for these sites which is not required to be engineered and the dilemma this creates for his business losing clients when informed of the AES option. This assertion clearly illustrates the conflict of interest that exists with Mr. Williams lobbying for changes to the way an approved technology is used in the State of Idaho. I cannot speak to the deliberations of the TGC, but given the thoroughness of the approval process, consideration of “environmentally tough conditions” seemed to be a central component of the approval process by the TGC.

It is not our intention to denigrate the engineering profession; we respect and value it highly. Most engineers find our technology to be a useful tool in their toolbox. However, when an innovative technology and thorough approval offer increased simplicity, value and reliability to the Idaho homeowner without compromising public health, disrupting the status quo should be a secondary consideration.

Sincerely,

Donald Prince, Technical Advisor

Presby Environmental, Inc.

143 Airport Road, Whitefield, NH 03598

(T) [800-473-5298](tel:800-473-5298) (T) [603-837-3826](tel:603-837-3826)

APPENDIX G

1:36 PM **Dale Atkinson Letter dated January 20, 2017**

- TGC discussed Mr. Atkinson's request for policy regarding septic tank pumping requirements.

James Craft asked Dale Atkinson since he was present in the meeting if he would like to give his comments regarding his submitted letter.

Dale Atkinson said, "I have been frustrated for fifteen years, to be held responsible for septic systems I do service for. Homeowners are not following my recommendations, nothing is being done about it, and I am tired of it. Something needs to be put in place that pumping needs to be done."

James Crafts explained to Dale Atkinson that DEQ provides recommendations in several places to have tanks pumped every 3-5 years. Recommendation is on the DEQ website and in guidance from EPA's website along with informational brochures. James Craft asked how districts would be able to enforce and manage when a septic tank needs pumping. It is not realistic to hire a whole 'police' force to enforce that policy. Dale Atkinson said, "Recommendations don't work, it needs to be a requirement." James Craft asked Dale for recommendations on how that would be enforced. Dale Atkinson said, "You could check on it when the house is sold, check when the tank is pumped, and check when the septic system fails. It is impractical to hire an army of policeman to enforce it."

James Craft said, "The service provider model is designed to check septic tanks as part of the operation, maintenance, and monitoring (OMM) for ETPS systems and would be documented on annual reports. The service provider checks the septic system to determine when pumping is required. Not pumping the septic tank can lead to drainfield failure. James Craft read examples from the TGM and afterwards stated, "If the property or system owner doesn't keep up with OMM, they would have consequences of a failed septic system." Mike Reno, Kellye Eager and Jason Peppin gave instructions about permitting and information given to the septic system owners, but they all agreed they cannot force the owner to read what they are given. Jason Peppin said, "Mainly permits are to instruct, we just do not have any authority as a Health Department to enforce." James Craft commented on the variability in situations on whether or not a septic tank needed pumping. I think there is plenty of guidance for recommendations on when to pump a septic tank. Dale Atkinson asked, "What happens when they don't pump?" James Craft said, "That would be a case by case basis for the Health Department to consider."

James asked for any further comments from the TGC. No comments were given. The discussion was ended at this time. TGC decided not to change existing rules or provide further policies or guidance.

1:50 PM **SSD Program Update**

- **DEQ webpage updated to reflect new rule change for ETPS**

James Craft said to refer to DEQ's website when people call in with questions.

- **Service Provider list development**

James Craft showed the current service provider list and said he will mail out another letter with a hard copy of the list; recognizing not everyone has access to the internet.

- **Public outreach letter to notify property owners about service provider list**

Mike Reno asked if DEQ would need another updated address list. James Craft said he would send out another request for districts to return an updated ETPS mailing list.

Alan Worst from the audience commented, "I took the test and passed it, do I need a certificate, or are there no provisions for those long time providers to be grandfathered." James Craft said, "The certificate needs to be provided from the manufacturer."

Sheryl Ervin with Biomicrobics asks to give comment via telephone. Sheryl Ervin said, "As far as de-certifying a service provider, what is the process for that? Do we send an email to you stating the reason?" James Craft said, "Every year we rely on the manufacturer's certification. If for any reason the manufacturer does not certify a service provider, then yes a letter stating the manufacturer's reason is appropriate and I will pass that on to the health districts to make all aware."

- **Service Provider FAQ and Study Guide**

James Craft said you can find the frequently asked questions (FAQ) and study guide about service providers on the DEQ website with links to resources. Jason Peppin thanked James Craft for adding the links, stating it is very helpful. Kellye Eager asked, "Do we know how long it is taking someone to pass the test? TGC discussed test taking time limits and agreed it should be limited to 2 hours."

Mike Reno asked, "Are non-licensed employees allowed to work under a certified licensed installer or does it have to be the certified installer to do the work." James Craft said, "Whether the certified installer is onsite or not, it is the laborers/technicians who are installing without certification. I think it would be okay to have laborers perform service provider duties, but the responsibility comes back to the lead service provider." Jason Peppin said, "That is the only way it seems practical to get to all systems checked all over the state."

Sheryl Ervin (via telephone) asked for more clarification, "I have a question with reporting, if house is vacant for various reasons, how are they to report to the state for systems not currently in use? Do they need to hire a service provider to do that?"

Mike Reno said, “Typically the service provider would provide that explanation to us in writing that the house is vacant.” Sheryl Ervin said they had a site with a RV on it. Mike Reno instructed Sheryl Ervin to contact your local health department.

Keith Taylor from the audience asked to give public comment. Keith Taylor said, “I am a complex installer and have been working my way into this business.” Keith Taylor said, “I am concerned with the response to the certified installers having other hires working under them comment. Is it possible to make that complete 100% law? Keith Taylor explained to TGC that companies like these have multiple turn over employees and wondered if this is better than having one trained person. Keith Taylor mentioned he got involved in this service provider business because he has an extended treatment package system at his house. Keith Taylor expressed how end users will feel with a different guy coming out to their site every time and claimed a non-certified installer will not know as much as the actual certified installer. As homeowners that could be a big conflict as to who actually does the work and whether that work is of the same quality or not. Keith Taylor said he would be frustrated if his or his neighbors’ ground water was contaminated due to lesser quality work.

Alan Worst commented, “We had a situation like this and I can see that happening with the service provider model.” Keith Taylor mentioned there is no one monitoring qualifications of installers/laborers who do not have certifications. James Craft asked Keith Taylor what he would recommend, Keith replied, “I would like to see an auditing process. There are several competing plumbing companies charging lower prices, \$99, it doesn’t give us a chance. I am a concerned homeowner and installer and have run my own plumbing company. I am not an expert in this, but am putting a lot of energy in getting into this and doing it right. There is a lot of turnover with in those businesses.” Mike Reno said, “We don’t have funds as a health district to audit service providers and all their work.” Keith Taylor said, “As a homeowner maybe there should be something in place making sure systems are serviced properly. State and community water quality are suffering.”

Sheryl Ervin (via telephone) said, “If you have someone who is on the service providers list as a certified complex installer and they switched companies after getting on the list. I see issues with tracking this and verifying certification under the new company. If they leave one company due to problems with cutting corners and go start new at another company, how would we track and prevent that?”

Mike Reno recommended a resolution to Sheryl Ervin’s comment that the certified complex installer’s permit can state that those employees under him will need to meet the manufactures certification. Sheryl Ervin liked Mike Reno’s recommendation. James Craft asked how the districts would track these employees. Sheryl Ervin said, “I would love to hear other solutions, more than it is okay for the complex installer to have sub installers under him have manufacturing training as well.” Mike Reno said, “A service provider complex installer needs to have training as a requirement to work under the licensed complex installer.”

Jason Peppin expressed concern on how the health districts would track training for the complex installers. Sheryl Ervin said, “When annual reports are submitted, they could submit a list of technicians/installers who are part of the contract.” Mike Reno said, “Complex installers annually provide certificates, that service provider would also provide certificates then for those under him.” Kellye Eager recommended that health districts need to explain this tracking issue to the complex installers during the renewal process and further guidance in the TGM may be needed. Mike Reno mentioned homeowners and TGC would feel a lot more comfortable if there was a process for tracking and verifying installer training certificates. Mike Reno referred to James Craft to help figure out that process.

Keith Taylor from the audience expressed he would like a way to verify if a service provider is trained for when they coming to my door to fix the system. James Craft said the service provider list is available on DEQ’s website and showed the audience where to find the list. Jason Peppin added the service provider model is structured so that it is the responsibility of the home owner to find and contract with a service provider. Sheryl Ervin (via telephone) provided a scenario about different service providers coming to a property from the same company and how there is no way to guarantee if the other person is a certified service provider.

Keith Taylor reiterated his concerns with the service provider model and said based on his experience, the industry pushes heavy on marketing, and he sees a potential for abuse. James Craft said TGC and DEQ will take all of this discussion into consideration as we tweak the service provider model.

- **Proclamation for Septic Week September 18-22, 2017**

James Craft briefly read the proclamation from Governor Otter and said the proclamation will be posted on DEQ’s website. James Craft will send a link to the health districts to make them aware.

- **SSD Program Audits at Districts ongoing July – Nov 2017**

James Craft said he is conducting subsurface sewage disposal program audits at each district and may give a summary of the audit at a later TGC meeting.

NEXT MEETING:

2:25 PM Scheduling Next TGC Meeting

James Craft scheduled the next committee meeting for December 7th at 9:30 AM to 2:30 PM depending on the number of agenda items. It will be held at the Idaho Department of Environmental Quality’s state office. James Craft proposed to have the meeting adjourned

Motion: Mike Reno motioned to adjourn meeting.

Second: Kellye Eager

Voice vote: Motion passed unanimously.

2:27 PM Meeting adjourned.

List of Appendices

Appendix A – TGC Meeting Minutes from June 8, 2017

Appendix B – TGM Section 4.19.3.4. Dosing Chamber

Appendix C – TGM Section 4.8.2 Approval Conditions

Appendix D – OSCAR LOWeFLOW Treatment System Design Manual for Idaho

Appendix E – Infiltrator ATL Design and Installation Manual (revised)

Appendix F – Gerald R. Williams Engineering Letter dated June 6, 2017

Appendix G – Dale Atkinson Letter dated January 20, 2017

*Begin and end time will be observed. Agenda items and their allotted times may vary dependent upon the amount of interest and participation for each item.

** Agenda appendices are color coded to track changes. **Blue text indicates changes that were made in previous Technical Guidance Committee (TGC) meetings.** **Red text indicates changes that are newly proposed for this TGC meeting.** **All green text indicates text that was moved from one area of a section to the new area.** All text with strikethrough markings regardless of color is either proposed to be deleted from the guidance or moved to another location within that section.

The call in number is (208) 373-0101 Bridge # 1 (9:30 AM – 2:30 PM)

To Join a Conference Call

1) Auto-Attendant Transfer Option

Conference Call Auto-Attendant Number:

- Extension 0101: Inside DEQ phone system
- (208) 373-0101: Outside callers

Participants call auto-attendant number and are then prompted to enter their pre-arranged conference call bridge number and in this case press the number **1**. Once the bridge number has been entered, callers are automatically connected to their conference call.

Notification

As participants are added to a conference call, an audible chime is heard by participants already connected to the call. If the conference is in progress when the chime is sounded, it is advisable to acknowledge the new participant and ask who has joined the call. This will ensure that the new caller has gained access to the proper call.

WebEx Instructions

To Join WebEx

This will allow users joining the meeting via online video conference to view the same computer material that the subcommittee members are seeing at the meeting location. To hear audio users will still need to call the conference call number above from their telephone. Login information is below.

1) Visit the Website Below

- <https://idahodeq.webex.com/idahodeq/j.php?MTID=m30f552f9aebaa0d6e8c4f0713e6e4482>
- Enter the username: WebExIDEQ
- Enter the password: TGCM0907

Audio connection: To phone in please call into Bridge #1 by dialing # (208) 373-0101 Opt 1.

Appendix A
Technical Guidance Committee
Meeting Minutes

Wednesday June 8, 2017

Conference Room C
Department of Environmental Quality
1410 North Hilton
Boise, ID

TGC ATTENDEES:

James Craft – Onsite Wastewater Coordinator, DEQ, (TGC Chairman)
Mike Reno – REHS, Environmental Health Supervisor, CDHD
Jason Peppin – REHS, Senior Environmental Health Specialist, PHD
Kellye Eager – REHS, Director of Environmental Health, (EIPH)
Dale Peck – PE, Environmental & Health Protection Division Administrator, PHD

GUESTS:

Mark Fricke – Presby Environmental Inc.
Fred Vengrouski - Presby Plastics, Inc.
Larry Waters – PE, Wastewater Program Engineering Manager, DEQ
Mike Piechowski – P.E. Technical Engineer, DEQ
Whitney Rowley – Administrative Assistant, DEQ
Mark Cecchini-Beaver – Deputy Attorney General, DEQ
PaRee Godsill – Everlasting Extended Treatment,
Norm Semanko – Moffat Thomas Attorney representing Presby Environmental, Inc.
Tim Wright – Southwest District Health
Lisa Bahr – Southwest District Health
Jay Holman – Infiltrator Water Technologies. (via telephone)
Alan Worst – R.C. Worst & Company, Inc. (via telephone)
Lee Rashkin – Presby Environmental, Inc. (via telephone)
Dave Lentz – Infiltrator Water Technologies (via telephone)
Ashley Garrison – Presby Environmental, Inc. (via telephone)

CALL TO ORDER/ROLL CALL:

Meeting is called to order at 10:00.

Committee members and guests introduced themselves. James Craft introduced himself as the TGC Chairman.

OPEN PUBLIC COMMENT PERIOD:

10:05 AM James Craft opened the meeting for public comments. No initial public comments were given from those attending the meeting.

James Craft stated he had received some public comments via email that he would read into the meeting minutes. First Public Comment via email was from Fred G. with Presby Environmental regarding the May 3rd meeting. No questions or responses to the Presby Environmental email dated May 3rd. See Appendix H Public Comments for a copy of the Presby Environmental email.

James Craft read the next public comment via email into minutes which was a letter from Presby Environmental Inc. sent to Larry Waters 5/2/17. No questions or comments regarding the Presby Environmental letter. See Appendix H Public Comments for a copy of the Presby Environmental letter.

James Craft read the next public comment via email into the minutes which was a letter from Williams Engineering, Inc. 6/7/17 regarding AES systems. See Appendix H Public Comments for a copy of the Williams Engineering, Inc letter.

Dale Peck asked James Craft, "To clarify, are these letters being read into the minutes for discussion today? James Craft replied, "The letters read into the minutes are not for discussion today and will be on the agenda for next TGC meeting. Fred Vengrouski asked, "Will the meeting be an open meeting or a closed door meeting?" James Craft told Fred Vengrouski that the letters read into the meeting today will be discussed at the next TGC meeting and members of the TGC and members of the audience are welcome to participate.

MEETING MINUTES

10:35 AM **May 3, 2017 Draft TGC Meeting Minutes: Review, Amend, or Approve**

Norm Semanko requested clarification on Presby System Manual @10:10AM. He requested different wording in minutes to reflect what he said. James Craft made the requested changes in the meeting minutes to reflect Norm Semanko's statements.

Norm Semanko also requested clarification on the minutes asking, "Does 'holding a position' mean on a committee or on an issue? Please change....which they or their business have a pecuniary interest in, without first disclosing the conflict of interest as required by law." Norm Semanko requested the minutes to accurately state what he said. Dale Peck responded, "My memory is more of TGC had conflicts of interest that were not disclosed. I don't remember industry being stated in the comment." Norm Semanko said, "I would agree with Dale Peck to that." James Craft corrected the TGC May 3rd minutes to reflect Norm Semanko's statement.

Norm Semanko asked the committee to please note in the TGC May 3rd Minutes at 10:37 AM that the comment letter received by DEQ from Presby dated May 2, 2017 be included in the meeting minutes as an appendix item. Dale Peck asked Norm Semanko, "Note that the letter was just provided?" Norm Semanko said, "Yes".

Motion: Dale Peck moved to conclude minutes reviewed as amended.

Second: Mike Reno

Prior to asking the TGC for a vote, a follow up question was asked by Fred Vengrouski.

Fred Vengrouski stated, "I reviewed minutes of last year; the AES review was five pages of notes. Do you still have the same person taking minutes?" James Craft stated that he took the meeting minutes last time at the TGC May 3rd Meeting. Fred Vengrouski said, "I am concerned with the detail in the minutes and the length of minutes. It seems unfair how ATL is being treated compared to others and how the committee reviews other products [referring to Infiltrator's ATL System]. A request was for 70ft per bedroom, there was a lot of discussion on this topic, and was not noted in detail in the minutes. I would like to see that discussion entered in the minutes. It is important to Mr. Worst, Infiltrator, and Bio-Mircobics that we provided field data. Is Infiltrator required to submit field data also? Do they have it available? We would like to recommend it be added to the minutes. Thirty (30) systems for a 3 year period of time is what we suggest be submitted.

Dale Peck said, "I believe items are identified in the Presby comment letter dated May 2nd. Are we considering ATL now? There was not enough time at that point for DEQ to do a review during the May 3rd meeting, due to the late submission of the document. Length and loading rate questions will be discussed at a later meeting after DEQ has done an official review." Mike Reno also commented, "The Infiltrator ATL System was not being reviewed as of yet, but will be." James Craft stated, "TGC gave a cursory review on the Infiltrator ATL System product. The product will be discussed at another meeting after reviews have been done by DEQ and TGC. DEQ has completed its initial review of the Infiltrator ATL System product and will provide comments back to Infiltrator in a letter. The DEQ comment letter is not public record for this meeting."

Fred Vengrouski discussed his personal career background and history in his field. Fred Vengrouski said, "Please keep in mind that Infiltrator's product was never intended for approval." Mike Reno stated, "We have a responsibility to review every product that comes to us." Fred Vengrouski concludes his comments saying, "We believe in fair competition and believe that the committee should be fair to all products with the same level of scrutiny. Thank you for your time."

Motion: Dale Peck moved to finalize May 3, 2017 TGC Meeting minutes review.

Second: Mike Reno

Voice Vote: Motion carried unanimously. Minutes will reflect changes and be posted to DEQ's website as final.

After the voice vote Dave Lentz, from Infiltrator (via phone) said he would like to correct statements from comments made earlier. Dave Lentz stated that Fred Vengrouski's statement about Infiltrator's product never intended for approval is not accurate and completely erroneous. Dave Lentz said that we are not proposing 70 ft. per bedroom; the manual states the 70ft/bedroom requirement. Infiltrator is selling the product and is intended for sale. Infiltrator's intent is to participate in market systems and is not intended to sit on a shelf. Infiltrator will provide DEQ with field data.

10:53 AM James Craft moved to take the Service Provider Exam section on the agenda and move it to the end of the meeting to allow the TGC to enter into an executive session due to the sensitivity of discussing exam questions and answers pursuant to Idaho Code § 74-206(1)(d) to consider records exempt from disclosure under Idaho Code § 74-108(5).

First: Dave Peck

Second: Kellye Eager

Voice Vote: Motion passed

APPENDIX B:

10:55 AM **Discussion on draft changes to TGM Section 4.19.3.4 Dosing Chamber**

- TGC to discuss proposed changes by Allen Worst's to Section 4.19.3.4

Dale Peck asked James Craft to clarify if these comments provided by Allen Worst to Technical Guidance Manual Section 4.19.3.4 are to review for preliminary approval? James Craft said, "Yes". Due to Joe Canning's absence, James Craft read an email submitted by Joe Canning dated May 27, 2017 to address his comments on section 4.19.3.4.4.a, 4.19.3.4.4.c. See Appendix B for a copy of Joe Canning's email dated May 27, 2017 with comments.

Regarding 4.19.3.4.5.a:

James Craft read Joe Canning's comment: "4.19.3.4.5.a – Is the word "vault" necessary to be added? It seems that it could be eliminated and still work in the text. I am thinking of the full pump screen that I still see occasionally."

Dale Peck stated the word “vault” should be used elsewhere. James Craft made revisions to the document according to comments discussed at the time.

James Craft read Joe Canning’s comment, **4.19.3.4.5.a**: “What is a ‘larger flow’ system? Will everyone know what that is? This is also mentioned in **4.19.3.4.5.c**.”

Dale Peck asked Alan Worst, “Wouldn’t it be anything greater than a single family home? What amount of gallons is 4sq ft. to represent?” Alan Worst (via phone) responded, “It was a minimum requirement sq. ft. to any filter. 150 to 350 gallons per day.” Dale Peck asked, “Anything less than 5 beds?” Mike Reno asked, “Is larger flow anything less than 500 gal per day?” Alan Worst (via phone) responds, “Yes.”

Jason Peppin said, “I have one concern with that. With a house and accessory unit it can be over 400 gallons a day easily. How do we fill the gap between larger flows and non-pressure systems?” Mike Reno stated, “Anything over 1,500 sq. ft.?” Dale Peck stated, “It is quite a bit less than previous calculations. How was 12 sq. ft. derived?” Mike Reno asked, “Are current filters approved for 12 sq. ft.?” Alan Worst replied, “They are not.” Jason Peppin states 4 sq. ft. is flow area vs screen area? Alan Worst replied, “Yes 4 sq. ft.” Jason Peppin commented, “Effluent filter surface area can be holes or slots that are wider apart between flow areas.”

Dale Peck clarified, “So flow area is the holes and spacing area where water can flow through.” Alan Worst said, “Yes. In looking at the list of those with pump filters, most would not meet requirements. All pump vaults, pump screens currently in Idaho have 4 sq. ft.” Dale Peck stated, “So we would say no greater than 400 gal per day for a single family residence?” Alan Worst replied, “Yes I am fine with that.”

Alan Worst said, “I would bring our attention to the charts with flow data. They are dramatically higher than anything we would need. We can set it at what makes the most sense with what is needed and what fits the engineering. The flows in this chart cover up to 800 gallons per day for a 4 year maintenance guide.” Dale Peck stated, “Looks like it is good for everything but engineered systems. What if we changed the wording to non-engineered applications?” James Craft corrected section 4.19.3.4.5.a to reflect discussion of TGC. Alan Worst, Mike Reno and Dale Peck agreed on the changes.

Dale Peck suggested charts given by Alan are included. Alan Worst said, “I recommend seeking that info from other manufactures. I don’t want those calculations to come from me. These are calculations I put together based on their literature, but not necessarily public calculations.”

Jason Peppin stated Joe Canning’s Comment for **4.19.3.4.5.a**, “Will ‘larger flow’ systems be PE designed?” was addressed in earlier changes.

James Craft read Joe Canning's comment for **4.19.3.4.5.a** "This section on a "pump screen" is being eliminated. I still occasionally see them on new systems and feel they have worked well over the years. It seems the screen should still be an option." Jason Peppin stated, "Striking the word 'vault' takes care of this." Mike Reno agreed it was already addresses. Alan Worst also agreed striking the word vault is okay. Jason said, "The term 'vault' is used interchangeably; to strike it will eliminate confusion." Alan Worst agreed to Jason Peppin's comment.

James Craft read Joe Canning's comment for **4.19.3.4.5.c**, "The word "can" should be changed to "may."

Dale Peck suggested to, "Take out 'vault' in 2nd line for consistency, and change 'may' to 'can' in the first line. James Craft made changes in the document according to what was agreed on during the discussion.

Alan Worst asked, "Is referring to manufacturer rate of flow related to effluent filter?" Dale Peck asked, "Why are we using 4 years?" Alan Worst commented regarding Dale Peck's question, "To correspond to septic tank pumps cleaning intervals with when the filter is to be changed. I picked 4 years out of the air. It is my attempt to help the home owner remedy the situation around needing to clean the effluent filters with a closed off mechanisms." Alan Worst said, "That filter is not in the best interest of the home owner to address flow on a regular basis. With that said, PolyLok does have other filters that would meet the requirement."

Mike Reno asked, "What would DEQ have to do to say to the home owner, your filter was approved but is no longer approved for the state of Idaho? That would affect a lot of people." Dale Peck clarified if PolyLok is the one with a shut off valve. Alan Worst verified, yes it had a shut off valve. James Craft asked the committee, "What do we recommend to the State?" Alan Worst replied commenting on the use multiple filters. Mike Reno said, "On PolyLok filters we can leave as approved because of the design of the filters." Dale Peck questioned, "Unless it has a self-locking closed mechanism?" Mike Reno replied, "I don't feel comfortable going back and saying they are not approved when we don't have evidence of them not working." Alan Worst comments in regards to possibly having problems with just one filter. Mike Reno said, "Right now it cannot be used as a screen in place of a pump unless it has a closed off feature."

Dale Peck asked the Technical Guidance Committee, "What do we propose the paragraph should state?" Mike Reno suggested, "...unless close off feature to prevent effluent from being discharged to drain field when filter is removed. Dale Peck also suggested changing the wording "large flow" in paragraph above. Kellye Eager stated, "Yes we should keep it consistent with the single family requirements." James Craft changed the document to reflect discussion changes.

James Craft read Joe Canning's comment on section **4.19.3.4.5.e (old)** – “This section on requiring a closing mechanism is being deleted. Does everyone agree with this? Looking at the table of products that Allen put together, many have closing mechanisms and many don't. I don't have much of an opinion on this. The old style pump screens could certainly be removed from the dosing tank and the system would continue to operate.” Dale Peck commented, “We have taken care of Joe Canning's comment **4.19.3.4.5.e** because put the closure mechanism back in.

James Craft read Alan Worst's comment received via email on June 7, 2017, “Any effluent filter used in a septic tank in place of conventional outlet piping, shall conform to the liquid draw requirements listed under IDAPA 58.01.03.007.11.d. which is 40% of tank liquid volume in vertical walled tanks, and 35% on horizontal cylindrical tanks.” Alan Worst's comment was incorporated to Section 4.19.3.4. and added as paragraph 5.d.

Motion: Mike Reno moved for preliminary approval for this appendix as amended.

Second: Dale Peck

Voice Vote: Motion was passed unanimously. Section 4.19.3.4 Dosing Chamber to be posted for 30-day public comment period.

See DEQ website and Appendix B and provide comments by July 17, 2017, 5 PM MST to James Craft by email at james.craft@deq.idaho.gov.

11:35 AM James Craft called for a 10 minute break

11:45 AM Meeting Resumed

APPENDIX C

11:45 AM **Section 1.4 Product Approval – Review for final approval**

James Craft stated no public comments were received within the 30 days. Dale Peck asked, “Did DEQ make any additional changes?” James Craft replied, “No additions were made in this section.”

Motion: Dale Peck motioned for final approval

Second: Mike Reno

Voice Vote: Motion passed unanimously. Section 1.4 Product Approval will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

APPENDIX D

11:46 AM **Section 1.5 Installer's Registration Permit and Service Provider Certification**

James Craft discussed a few comments provided by Barry Burnell, DEQ State Water Quality Division Administrator. No public comments received on section 1.5 Installer's Registration Permit and Service Provider Certification.

Motioned: Mike Reno moved for the final approval with recommended changes by Barry Burnell

Second: Jason Peppin

Voice Vote: Motion passed unanimously. Section 1.6 Service Provider will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

APPENDIX E

11:47 AM **Section 1.6, Service Provider- Review for final approval**

James Craft stated no public comments were received on this section.

Motion: Dale Peck motioned to approve for final approval

Second: Kellye Eager

Voice Vote: Motion passed unanimously. Section 1.6 Service Provider will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

APPENDIX F

11:50 AM **Section 1.9, Managed Operation, Maintenance, and Monitoring - Review for final approval**

James Craft stated no public comments were received on this section.

Motion: Kellye Eager moved to approve for final approval

Second: Dale Peck

Voice Vote: Motion passed unanimously. Section 1.9 Managed Operation, Maintenance, and Monitoring will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

APPENDIX G

11:52 AM **Section 4.8, Extended Treatment Package System - Review for final approval**

James Craft stated no public comments were received on this section.

Motion: Mike Reno moved for final approval

Second: Dale Peck

Voice Vote: Motion passed unanimously. Section 1.9 Managed Operation, Maintenance, and Monitoring will be updated in the Technical Guidance Manual and posted on the DEQ website within 30 days.

11:55 AM Adjourn for lunch

12:50 AM Meeting Resumed

NOTIFICATION LETTERS

12:50 AM James Craft stated he has received feedback from the public outreach notification letters about service providers that were sent out to property owners. Several calls have come in with lots of questions concerning the letter, such as: “I don’t have access to a computer”, “My neighbor received a letter and I have a similar system but didn’t receive a letter”, and “Who do I contact to get a list of service providers?” DEQ will issue another public outreach notification letter later in the year to update property owners. James Craft plans to send another letter later in the year with a list of service providers. Dale Peck suggested another option is to have the service providers visit their local Public Health Department for a list and it will be closer to September when we know who is available and can be put on that list.

Alan Worst commented on the current operator list of non-profit names, “We only have 3; Orenco, Bio Micromics, and Everlasting. Those names can be included in the outgoing letter.” James Craft stated, “We can try and do that. I have updated addresses for those that have called and said they didn’t receive a letter. We will try and keep a current list of those.” Dale Peck asked James Craft to please share addresses with us since we probably do not have them either. James Craft agreed to share that information with each other as either party is informed of changes. James Craft noted there is a certain format needed for the addresses to be mailed out and which he will pass on to the Health Districts.

Dale Peck asked, “When is the next reminder letter being sent out?” James Craft answered, “A letter can be issued late August to September with status update and current list of service providers.” Dale Peck noted September or October is a good idea.

OTHER

12:56 AM

- **DEQ to update TGM for ASTM Standard Update for Corrugated Polyethylene Pipe and Fittings: ASTM F677 supersedes ASTM F40:**

James Craft mentioned the following: Updated TGC members with a change in ASTM designation markings. Corrugated Polyethylene Pipe with ASTM F405 markings had perforations with round holes. Corrugated Polyethylene Pipe ASTM F405 was replaced with ASTM F667 and now has oblong holes. New ASTM does not specify the shape but 1) The perforations shall be cleanly cut and uniformly spaced along the length and circumference of the pipe in a size, shape, and pattern suited to the needs of the user. 2) The inlet area of the perforations shall be a minimum of 1 sq. in. per foot [21 sq. cm per meter] of pipe, unless otherwise specified by the user.

- **Manufacturers specific training notification to manufacturers and service providers:**

James Craft mentioned the following: Are manufactures aware of the upcoming rule changes and needed manufacturing training needed for service providers? Was formal notification given to manufacturers?

Mike Reno and Dale Peck both commented they were not sure if formal notification was given. As well as, it is important they know at least the 3 names (Everlasting, Bio Micromics, and Orenko).

- **List of service providers on DEQ internet:**

James Craft commented, “DEQ will instruct property owners to contact their local Health District and/or DEQ website to find a current list of service providers.”

- **DEQ and TGC to review the Infiltrator ATL design and installation manual and provide feedback to Infiltrator:**

James craft said, “I will send DEQ’s comments on the initial draft manual sent in by Infiltrator out by the end of the week. Infiltrator will have a chance to review DEQ’s comments and send in a revised manual for further review by DEQ and TGC members.

- **DEQ to send guidance for deviation on Presby’s AES installation requirements from the above grade capping fill requirements to the seven health districts:**

James- DEQ received a reply from Norm Semanko, Attorney representing Presby as follow up from the May 3, 2017 TGC meeting. DEQ is reviewing the letter and will develop guidance later. DEQ has no further comments.

1:05 PM James Craft motioned to go to an Executive closed meeting to discuss the Service Providers Exam. I move to enter into an executive session pursuant to Idaho Code § 74-206(1) (d) to consider records exempt from disclosure under Idaho Code § 74-108(5). We will excuse the audience members at this time. Thank you for attending.

SERVICE PROVIDER EXAM

1:05 PM **Discuss exam content and recommendations received from Health Districts. Discuss language DEQ will require on the complex license to identify the installer as a Service Provider.**

James Craft speaking about the service provider exam said, "I narrowed down the exam to 50 questions, both multiple choice and true/false statements." Kellye Eager said, "Are you asking a question on a date, and only one time?" James Craft responded, "Yes there is one question on a date."

Tim Wright (TGC Guest), asked, "When they have passed a test, how long is it certified for?" Mike Reno responded, "Annually certification from the manufacture is given. They have to provide documentation of training every year for the service provider." Tim replied with a question, "Do they only have to pass the test once?" Kellye Eager comments certification is from the manufacture yearly. Jason Peppin stated a refresher course is done every 3 years. Dale Peck said, "They need certification from manufacture every year stating that they are in good standing with them to still install the product and they are properly performing the maintenance." James Craft mentioned it is on the manufacture to determine the standing of the service provider. Dale Peck referred to proposed rule change for IDAPA 58.01.03.006.06.c and 58.01.03.006.c. Kellye Eager commented entities have been servicing ETPS systems long enough to know who to rely on.

Dale Peck asked, "Could I get a brief letter from James Craft to the Health Department indicating the Rule change was done with legislative intent and that no fee was associated with it." James Craft mentioned DEQ will issue a letter about the rule change and no fee.

James Craft asked, "Is there a certificate or proof of passing?" Mike Reno responded, "DEQ has provided it, they decide what to put on it." Dale Peck suggested it is best to have separate certificates/documents. James Craft asked them to send him an example of the certificate. Dale Peck asked, "Is there a specific language DEQ wants to see on a Certificate in conformance with the Rule, not involved with what currently issuing on licenses?"

James Craft asked if he could get a copy of current complex license. Mike Reno said he could get that for James.

Tim Wright (TGC Guest) asked, "Who proctors the test?" Dale Peck replied, "Health Districts are giving the test." Jason Peppin stated he had a general question, "What exam resources are they going to have to pull for this test?" James Craft replied, "I got all the information from EPA's website, DEQ's website, and TGM. It was all readily available on the internet without needing a class." Dale Peck asked if the

Service Providers exam was open book. Mike Reno said, "Currently our installers test is open book and we did it that way so they don't call us all the time." Jason Peppin commented even with it being open book it is challenging for service providers.

Tim Wright (TGC Guest) mentioned, "Service providers are not allowed to have a computer with them during the test. A study guide would be nice to have because of the number of places used to search for questions/answers. It will be really hard to pass without a list of what to look at before taking the test." Mike Reno asked James Craft if he could put together at least one study guide list. James Craft agreed to do so. Jason Peppin comments, "Picturing some of the service providers, they could benefit from a Study Guide." James Craft said, "I can put together a short study guide." Dale Peck mentioned, "I think it is important to get people to this level. For the first round we might experience some trouble, but we want people who are capable and able to do this, to maintain them, and to be qualified.

James Craft asked, "What is a minimum passing score?" Mike Reno replied it was 70%. Dale Peck commented, "Let's not make it too easy, but it would be nice to have at least 2-3 people qualified in each district." James Craft commented, "We will learn the first time as it is taken and make adjustments and more questions overtime with multiple tests. Jason Peppin mentioned, "Typically we do have multiple tests, but for this we will not have a lot of people taking the test at one time."

Dale Peck asked James Craft, "Was this test intended to be handed out the first round?" James Craft replied, "This test is what will be passed out to the service providers." Jason stated, "I think it is applicable as long as they know where the information is coming from."

Dale Peck asked, "Can it be offered before July 1st?" Larry Water (TGC Guest) commented, "It probably should because of certification being due on that day." James Craft said he could complete a study guide by July 1st. Kellye Eager asked the TGC members if the test could be given out to a couple of people before July 1st since they already have had people asking us about it. Dale Peck mentioned, "We have been getting some phone calls from home owners wanting a list of service providers." Larry Waters said, "We don't have a list right now, but it will be posted on DEQ website when we have it." James Craft agreed, "Yes, we will post it when we have it." Dale Peck commented, "The homeowner complaints were the catalyst to make these changes."

Tim Wright asked, "When reporting is done in July 2018, who do they report to? Is it James, is it me?" James Craft replied, "The reports go to the Health Department." Larry Water said, "The Health Department have been sending them to the DEQ Regional Office but initially it goes to the Health Department."

Dale Peck clarified with Mike Reno that he will give a copy of the current license to James Craft. Mike Peck had already started to get that going. James Craft commented, "I will run by Mike Reno any other legal requirements to make sure they are proper legal certifications. Is it worthwhile for more information/instructions to be on the certificate?" Mike Reno said, "It is better with less info for our IT department. Let us address that as part of the training for testing." Dale Peck mentioned, "Four years from now we will collectively come up with a universal refresher course. One year from now after the first round we can already note problems and issues to be looked at for the next cycle."

James Craft asked, "Are there any other thoughts on the Service Provider Exam?" TGC Members responded, "Nope, it is very positive, thank you for putting it together."

NEXT MEETING:

1:30 PM James Craft proposed to have the meeting adjourned. The next committee meeting is scheduled to be on September 7, 2017 from 9:30AM to 2:30 PM. It will be held at the Idaho Department of Environmental Quality's state office.

Motion: Kellye Eager moved to adjourn the meeting.

Second: Mike Reno

Voice Vote: Motion carried unanimously.

1:35 PM The TGC meeting was adjourned.
