

**From:** [Clark Filip](#)  
**To:** [Paula Wilson](#)  
**Cc:** [Ed Marugg](#)  
**Subject:** Individual/Subsurface Sewage Disposal: Docket No. 58-0103-1901 - Negotiated Rulemaking  
**Date:** Wednesday, July 10, 2019 4:59:11 PM

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Ms. Wilson,

The following are my comments for incorporation of Idaho DEQ TGM Chapter 4 into Rule:

Page 4-1 of the TGM states, “the designer of alternative private systems...is required to be either a PE or an environmental health specialist.” This will be in conflict with Version 6.0 of the Idaho Subsurface Sewage Disposal Standard Operating Procedures which states, “The Health Districts do not design subsurface sewage disposal systems. The EHS only evaluates the applicant’s proposal to verify that it meets all of the requirements of IDAPA 58.01.03.” Making Health Districts responsible for the design of alternative systems puts an additional burden on EHS staff and may expose Health Districts and EHS staff to litigation should a EHS-designed system fail. Currently the burden of sewer system design rests on the bonded, licensed sewer installer and/or the owner of the sewer system.

Gravel, or “standard” systems appear to be the exception rather than the rule for new sewer construction. I propose removing gravelless trench systems from the list of alternative systems and referring to standard systems as standard gravel or standard gravelless. A standard gravelless used in conjunction with another alternative system type such as those listed in the Matrix of Compatible Alternative Systems would still be acceptable.

Please let me know if you have any questions.

Thank you,  
Clark J. Filip

**Public Health - Idaho North Central District**

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