

Pennsylvania

Sewage Advisory Committee

December 11, 2017

Patrick McDonnell, Secretary
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 8774
Harrisburg, PA 17105-8774

Dear Secretary McDonnell:

I am sending this correspondence on behalf of the Sewage Advisory Committee, as directed by Act 26 of 2017 which amended the PA Sewage Facilities Act (Act 537).

Act 26 says in part that "...the department shall, in consultation with the advisory committee, develop scientific, technical and field testing standards upon which an evaluation of each on-lot sewage system that has been classified as an alternate system in accordance with 25 Pa. Code § 73.72 (relating to alternate sewage systems) shall be based."

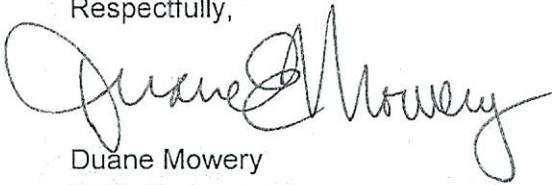
Representatives from DEP and the Sewage Advisory Committee met three times in the month of November in a workgroup setting to develop recommendations related to the Department's draft Act 26 Implementation Strategy. These recommendations were then presented to the Sewage Advisory Committee (SAC) on December 5, 2017 and approved for submission to you. Accordingly, please see below the recommendations of the SAC:

1. In the opinion of an overwhelming majority of participating members of the SAC, the proposed fecal coliform reduction requirements have not been shown to be a necessary component of the Implementation Strategy.
2. The SAC concurs with the CBOD and TSS limits of 10 mg/L for shallow limiting zone system applications.
3. The SAC supports Operation and Maintenance of onlot sewage alternate technology systems as necessary. The specific maintenance requirements should be developed in a collaborative effort with the manufacturers of those technologies.
4. The SAC supports allowing those technologies with NSF 40 certification, and meeting DEP advanced treatment standards, to move directly to the Annual Performance Audit phase without the need to show compliance with the Field Testing Standard.
5. The SAC supports continuing to follow onlot system isolation distances as specified in Chapter 73, with an additional 2' of separation to drip irrigation tubing, and any additional separation as deemed necessary by a soil scientist performing a site evaluation. This additional separation recommendation should be clearly stated in the soil scientist report.

6. The SAC recommends that, for new land development planning purposes, the minimum vertical separation to limiting zone should remain at 10" to a seasonal high water table and 16" to rock.
7. The SAC recommends that all shallow limiting zone systems should incorporate time dosing if a pump is used to pressurize the distribution lateral network.
8. The SAC recommends that a fail-safe mechanism or physical barrier be incorporated into onlot systems so that untreated or partially treated effluent is prevented from entering the soil absorption area.

We would like to thank your staff for attending the workgroup meetings and for engaging those in attendance in discussions and providing their reasoning for proposed standards. We look forward to continuing to work with the Department to implement Act 26. Please do not hesitate to contact me with any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Duane Mowery". The signature is fluid and cursive, with a large initial "D" and "M".

Duane Mowery
SAC Chairperson
P.O. Box 410
Newburg, PA 17240

cc: Jay Patel, Environmental Program Manager (electronic copy)
Brian Schlauderaff, Environmental Group Manager (electronic copy)