

**PERIODIC REVIEW OF THE
REGULATIONS FOR ALTERNATIVE ONSITE SEWAGE SYSTEMS
12VAC5-613-10 et seq.
Meeting Minutes May 22, 2018**

The Virginia Department of Health (VDH) held a listening session (public meeting) on May 22, 2018, in the 3rd floor, Training Room A, 135 Hall Avenue, in Suffolk VA 23434. The purpose of the meeting was to gather comment and feedback on the Regulations for Alternative Onsite Sewage Systems (AOSS Regulations), [12VAC5-613](#).

VDH staff Karri Atwood, Marcia Degen, and Lance Gregory facilitated the meeting and/or recorded minutes. The meeting was opened at 1:30 PM.

The following agenda was used for the meeting. A copy of the PowerPoint is attached to the minutes.

- I. Welcome and Overview of Alternative Onsite Sewage Systems (AOSS)
Dr. Marcia Degen, Office of Environmental Health Services (OEHS) Technical Services
- II. The AOSS Regulations, 12 VAC 5-613-10, et.seq.
Dr. Marcia Degen
Karri Atwood, OEHS, Legal Affairs
- III. The Periodic Review Process
Karri Atwood
- IV. Review of Working Draft Regulation
Dr. Marcia Degen and Karri Atwood
- V. Open for Public Comment on Working Draft of the AOSS Regulations.

Karri Atwood opened the floor for comment after the introductory remarks.

- A commenter said, regarding section 40: Why has the language been changed to specify Ksats at the installation depth? He does permeameter testing at 18 inches – holding a 10 inch head and feels that he is getting a good reading for the soil column. He requested clarity on the language. VDH responded that yes, the intention is that Ksats be run at the installation depth when required. A related comment that VDH has heard is that Ksats are not being run properly and are invalid, but the regulations have no criteria for acceptance.
- A commenter asked we could reference the Virginia Tech Ksat manual rather than adding an appendix on running Ksats. He suggests a simple reference to the manual.
- Commenter suggested a peer reviewed article instead and not the Virginia Tech Manual.

No other initial comments were offered so VDH reviewed key points in the working draft regulation and asked for input.

- Changing ‘average’ to ‘peak’ in relation to design flow throughout the regulation.
 - VDH noted that all small AOSS designs are based on peak flow and that Table 1 also is based on a maximum loading to the drainfield and that changing the regulation to peak flow instead of average daily flow will be more in line with how designs are actually accomplished. VDH also believes it will help in consistently applying the O&M requirements for large systems as well.
 - Commenter asked if the peak flow is from the structure. VDH responded that no, the peak is intended to be to drainfield. The definition in the working draft should be clarified to relay that intent.
- Adding a definition for ‘soil-like’.
 - 12VAC5-613-80.14 allows soil, sand, or soil-like material be used to increase vertical separation. Soil-like has no definition and as a result has been problematic from an implementation standpoint.
 - No comments.
- Commenter asked if the definition for soil permeability limiting feature is needed? VDH responded that it is not currently defined and since a permeability limiting feature triggers the need for a mounding analysis, a definition would help with consistency.
- Commenter stated he has run across some things that result in failures. He relayed a subdivision with no VDOT drainage, but high winter water table. If you test in the summer may look ok, but in the winter the water table is quite high. Some alternative systems installed in that subdivision have failed. Some new systems are seeping. Can you put conditions on a permit to require site drainage and maintenance of site drainage? If VDH has prior knowledge of high water table and failures, can VDH stop issuing permits? He says there are straight pipes being installed and we are not gaining anything by continuing to building there.
 - Commenter asked if requiring a water table study for certain conditions would help.
 - Other commenter responded he did not think so. He noted that there are redox indicators at 16 inches, but 3 months out of the year, the water table is higher. Local designers know about the issues and won’t do designs there so owners go outside of local designers to get designs.
 - VDH asked what modifications could be made to the regulations to address this? Commenter suggested looking at who owns and maintains the drainage system in a subdivision. If owned by VDOT ok, if private, no guarantees.
 - Commenter suggested that perhaps these types of local issues could be addressed through a local ordinance as not sure how to address through the regulations.
- Removal of 12VAC5-613-40.G.
 - VDH noted that the AOSS Regulations are supplemental to the Sewage Handling and Disposal Regulations and that all procedures related to filing an application are to follow the Sewage Handling and Disposal Regulations as stated in 12VAC50613-40.B. Section 40.G. sets a different standard for submittals under 32.1-163.6 that has been problematic with regard to adequate number of soil borings, depth of soil borings, and sanitary surveys. VDH sees no need to set a different submittal standard for engineered systems.

- No comments.
- Table 1 modifications to add in soil descriptors; remove Ksat; add in other dispersal methods, and split texture group III into 2 categories.
 - Commenter said he would like to incorporate a factor of depth of the trench (deeper trench is less likely to break out and has a higher pressure head associated with it). He'd like to see the a deep trench max loading rate to 5 gpd/sf. He does not see how the nutrient diffusion from that trench would be different.
 - Another commenter suggested to leave out texture as that would limit design.
 - Other commenter suggested leaving in ksats.
 - Commenter asked what was the problem with the ksats? VDH responded it was a suggestion from the stakeholders. Commenter suggested that maybe the units should change.
- Table 2 modifications to change 0-12 to 6-12 for depth to limiting features other than water table and changes for clarity.
 - Commenter noted that if VDH required 6 inches of in-situ soil for the 6 to 12 inches to limiting features that would eliminate all mounds, as it's common to be able to build it up.
- Section 90B
 - VDH stated that groundwater monitoring has always been required, but there was no detail. 90B was added to provide some minimum requirements.
 - There was a discussion regarding what is meant by wells installed in the first permanent water table. VDH explained that the intent it to be able to pull samples year round. One commenter asked what about when water levels drop due to droughts. Commenter suggested to maybe use the term aquifer instead of permanent water table.
- Section 90D; 90D4

Two commenters asked if VDH would really support direct dispersal in the Bay watershed with a TN of 5 mg/l as an effluent limit. Commenter asked how much scrutiny is VDH going to give to the treatment units. VDH responded that if the regulatory change is adopted, VDH would have to allow it. VDH noted that there will be sampling to support the performance.
- Sampling and Enforcement changes to section 100.
 - VDH explained that the changes would modify the '1+' enforcement strategy currently in place. Up to 1.5s the limit is compliant. Sample results 3x the limit would result in immediate enforcement. For larger system, out of compliance has been defined.
 - Commenter asked, "shouldn't the operator be testing other things if they get a high limit?" It is also not well defined where sample is to be sampled. He also suggested that BOD samples should be filtered prior to running the test so that only soluble BOD is measured.
 - Commenter stated that he has looked at the data submitted to VDH and based on that data, there is a 50% chance of getting 30 mg/l within that 180 days based on the data that is collected to date. He also noted that the database is defaulting to calling a unit a TL3 unit if data comes in under 10 BOD. He is concerned that units are not performing as claimed. He thinks we are going to see a lot of failures. What is VDH going to do about enforcement? There are a lot of units not being sampled. It's a

- skewed data set from just a small set of manufacturers who sell the first two years of O&M and sampling with the unit. There is no enforcement.
- Commenter noted that until we have full-scale enforcement procedures to ensure that we have all the data that we should be capturing, it's hard to say how well systems are doing.
- Commenter noted that it is an expensive way to check if treatment unit is working
- Another commenter agreed that 6 months of testing at NSF is enough and shouldn't be required to do additional testing.
- Commenter expressed concern about section 120A "operator is charged with ..." He asked what if the owner just calls to ask for a single issue diagnosis and hasn't contracted for him to operate and maintain the system.
 - Other commenter responded that he sees 120A as a benign statement. Should be appropriate for just a single issue as well.
 - Another commenter felt that the rest of 120 adequately defined the operator duties and that 120A was unnecessary. That was the general consensus of the group.
 - There is a general need to educate homeowners and operators on this.
- Deletion of section 210 - Waivers
 - VDH explained that the variance process would provide the same relief that section 210 does. Section 210 has also not been used much.
 - Comment: No comment.

VDH asked if there were any other comments from the audience.

- Commenter noted that at a number of sites he has seen that the texture by feel was not very accurate as compared to a permeameter, but they seem to be tighter soils. Systems permitted and immediately fail. It would be nice if there was a requirement to run a Ksat maybe when an mpi above 35 is estimated. He feels that the permeameter is more accurate and citizens are entitled to a more scientific measurement.
 - VDH asked for clarification – is it only for AOSS or conventional too?
 - Another commenter agrees that if Ksats are going to be a tool, they should be a tool for everyone, but if both are accepted practices (texture or Ksat) then should be ok.
- Commenter said he would really like to see VDH categorize the prescriptive and performance requirements. Right now, the regulation is very gray as 163.6 only need to comply with performance requirements.
- Commenter also said if you can treat to 30/30 standard and discharge to a stream, then should be able to discharge to soil. Only need 3 treatment levels: STE, TL2, TL2+disinfection. He does not agree that the loading rate or vertical separation would be affected if TL3 is dropped.
- Commenter noticed that VDH is proposing to allow CBOD, why not do COD? An operator can perform this test quickly. Has VDH compared the 2 (COD vs BOD)? VDH responded that they have not compared COD to CBOD. Commenter said that COD would provide a speedier understanding of what's happening on the site. COD also

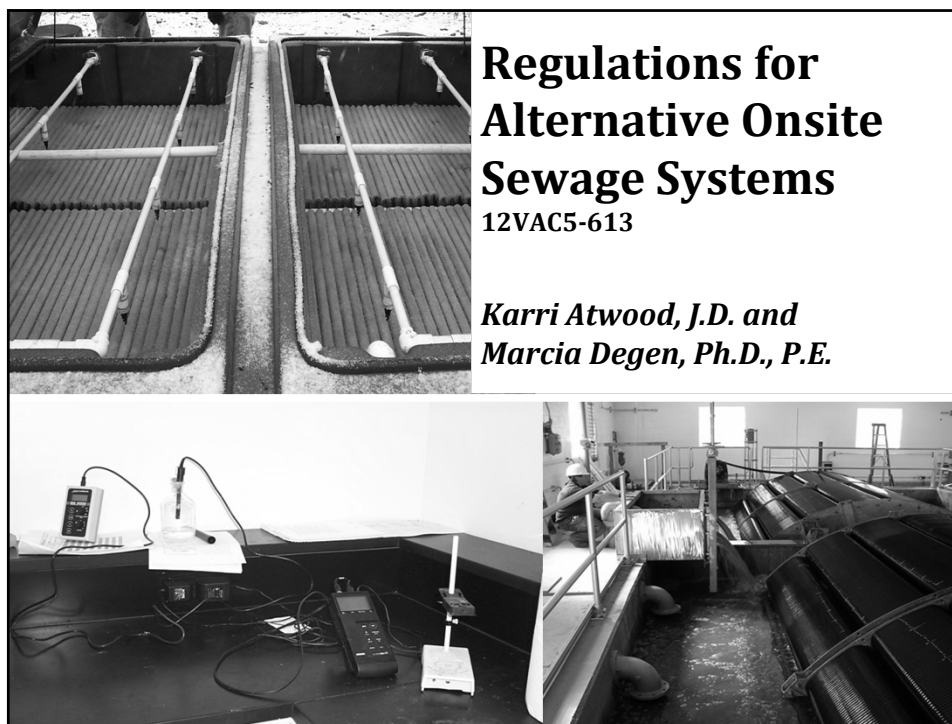
measures all organics so it would give a more conservative number than CBOD or BOD so would be to the regulatory benefit. He also stated that VDH should poll the operators to find out how many operators have a DO meter.

The meeting was closed at 3:30 PM.

If you were unable to attend a session, you may send comments to Marcia Degen at marcia.degen@vdh.virginia.gov, or Karri Atwood at karri.atwood@vdh.virginia.gov.

HOW TO SUBMIT COMMENTS: If you were unable to attend a listening session, you may still submit comment by email to Marcia.Degen@vdh.virginia.gov or Karri.Atwood@vdh.virginia.gov. **Comments on the working draft must be received by June 30, 2018.**

NEXT STEPS: A new working draft will be developed from the comments **received by June 30, 2018**. Focus stakeholder groups may be convened as needed to refine topics. VDH anticipates initiating the formal regulatory process to update the regulations in Fall 2018. During the formal process there will be additional opportunities to comment on the draft proposed regulations.



Regulations for Alternative Onsite Sewage Systems

12VAC5-613

*Karri Atwood, J.D. and
Marcia Degen, Ph.D., P.E.*

Today's Agenda

- I. Welcome and Overview of Alternative Onsite Sewage Systems (AOSS)
- II. The AOSS Regulations
- III. The Periodic Review Process
- IV. Review of Working Draft Regulation
- V. Public Comment

Onsite Wastewater Treatment Systems

Septic systems are used to treat and dispose of relatively small volumes of wastewater, usually from houses and businesses that are located relatively close together. Septic systems are also called onsite wastewater treatment systems (OWTS), decentralized wastewater treatment systems, on-lot systems, individual sewage disposal systems, cluster systems, package plants, and private sewage systems.

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How Many Onsite Sewage Systems?

- Approximately 1,015,000 total in VA
- 665,750 installed prior to 1990
- About 30,000 alternative systems in VA
- About 10% of new systems are alternative systems

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Two Basic Categories of OWTS

- Conventional
- Alternative

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Conventional Onsite Systems

Two main characteristics (must have both):

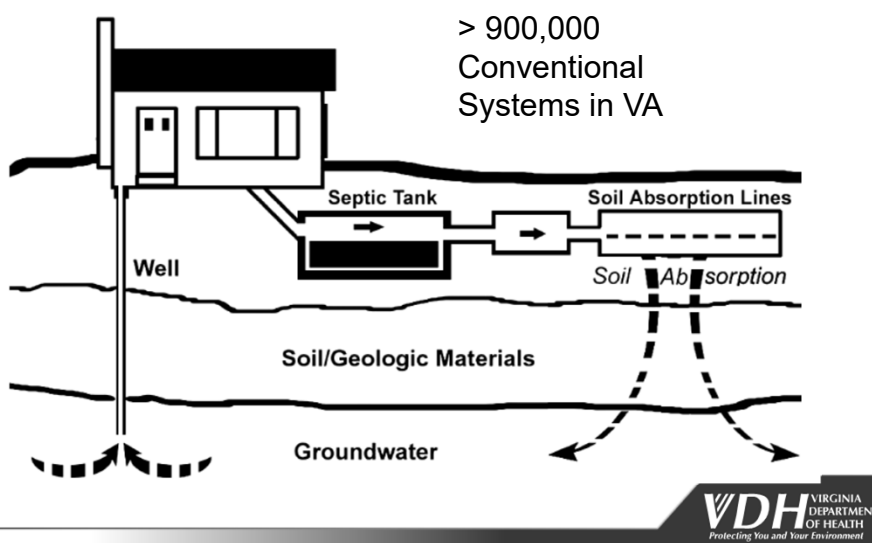
- Septic tank(s) for treatment
- Gravity distribution within a trench type drainfield

May use a pump when the drainfield is at a higher elevation

Relies on 'good' soils for majority of treatment

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Conventional System: Drainfield



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Conventional Onsite System



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Alternative Onsite Sewage System

"Alternative onsite sewage system" or "alternative onsite system" means a treatment works that is not a conventional onsite sewage system and does not result in a point source discharge.

Code of Virginia § 32.1-163

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Alternative Onsite Sewage System

Main characteristics:

- Treatment other than a septic tank, and/or
- Uses a method of distribution other than gravity, typically pressurized
- Does not result in a point source discharge

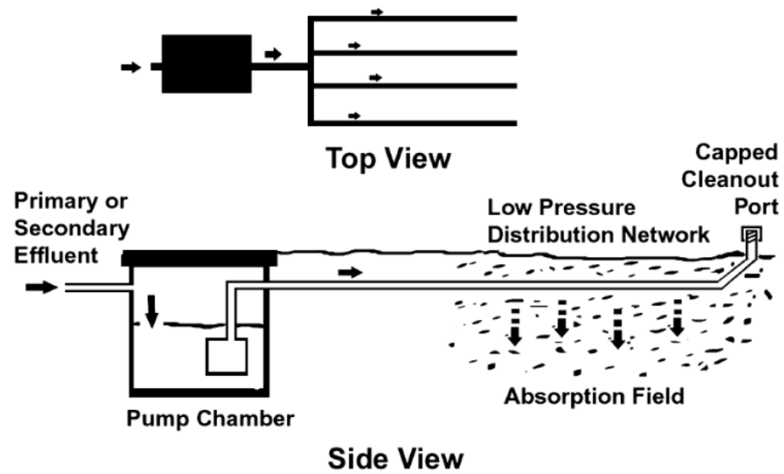
Designed to improve treatment of septic effluent in the soil, or

Provides additional treatment in a "box"

About 10% of all new systems are alternative

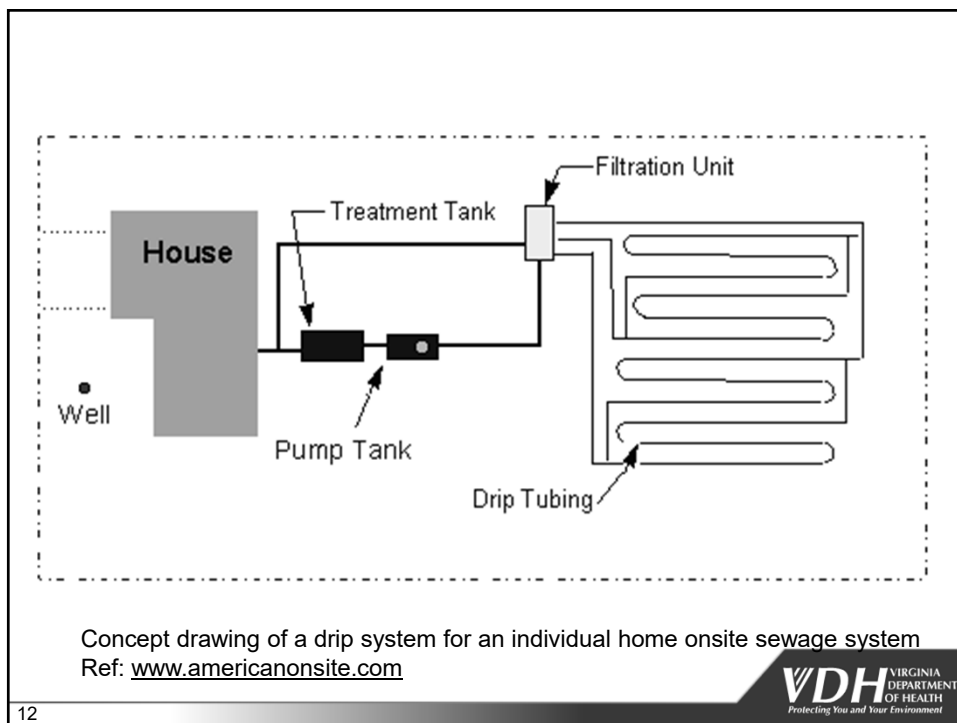
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Alternative Onsite System: LPD



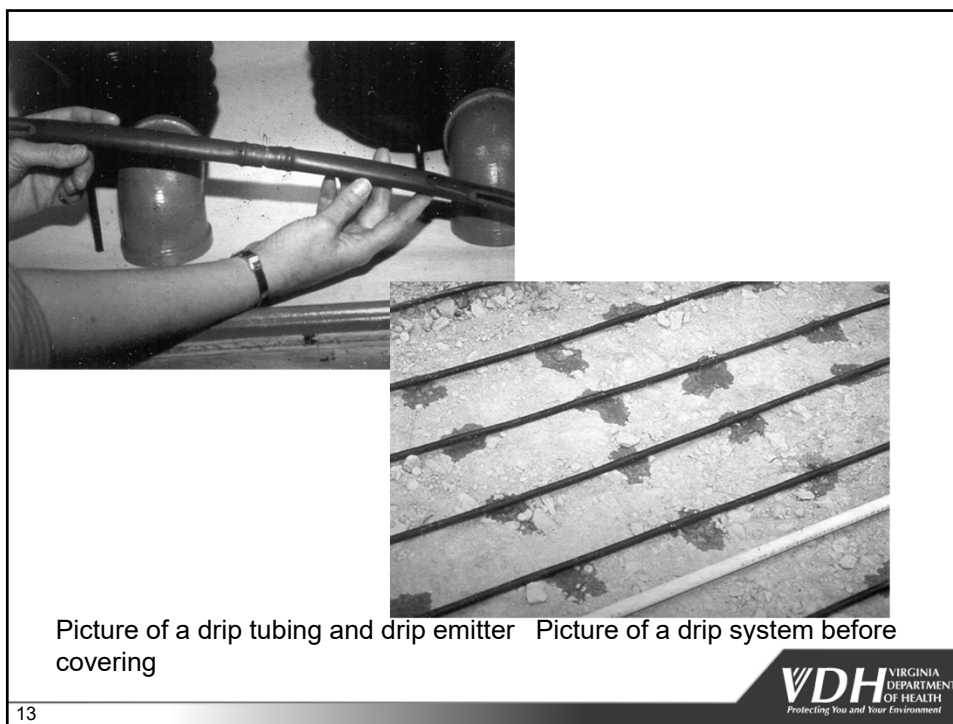
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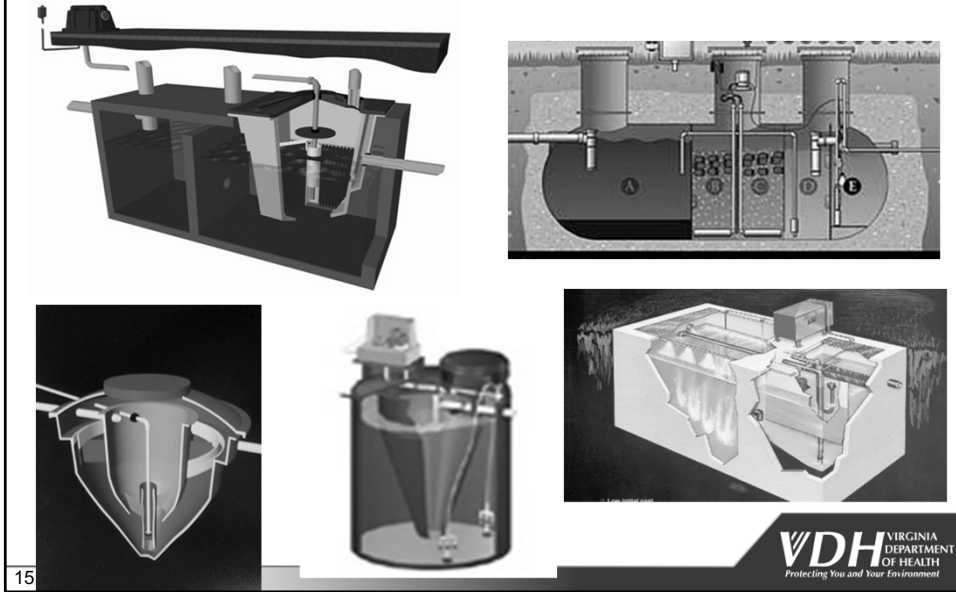


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Suspended Growth Systems - "ATUs"



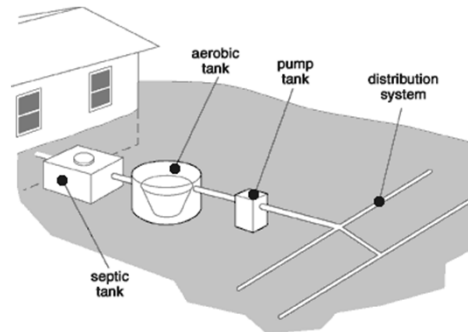
Attached Growth Systems - "Media Filters"



Layout

Positioned after primary tank (septic tank)

- minimizes the solids that enter an ATU
- provides some flow equalization



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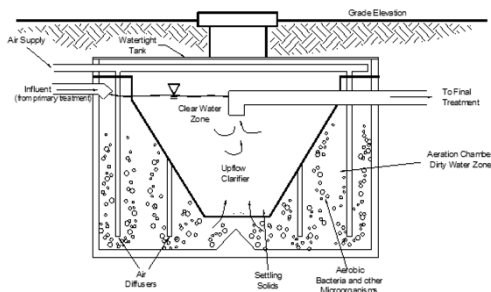


Cluster system serving 3 homes

ATUs are Biological Reactors

Miniature Wastewater Treatment Plants

- the biological processes are well-understood
- the overall design objective is effective mixing of microbes, wastewater, and dissolved oxygen



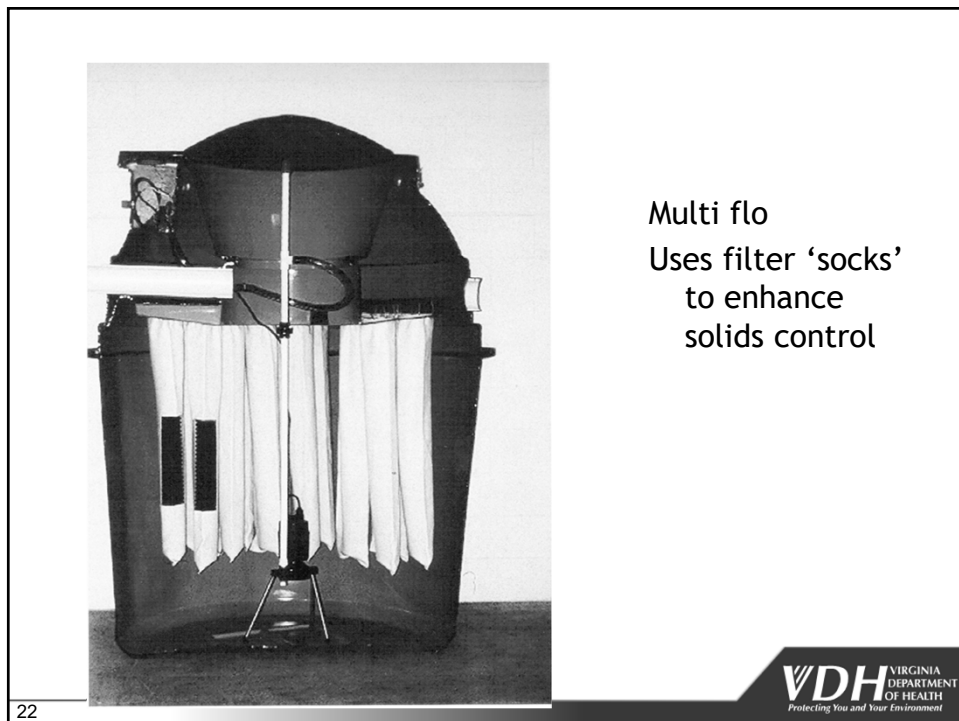
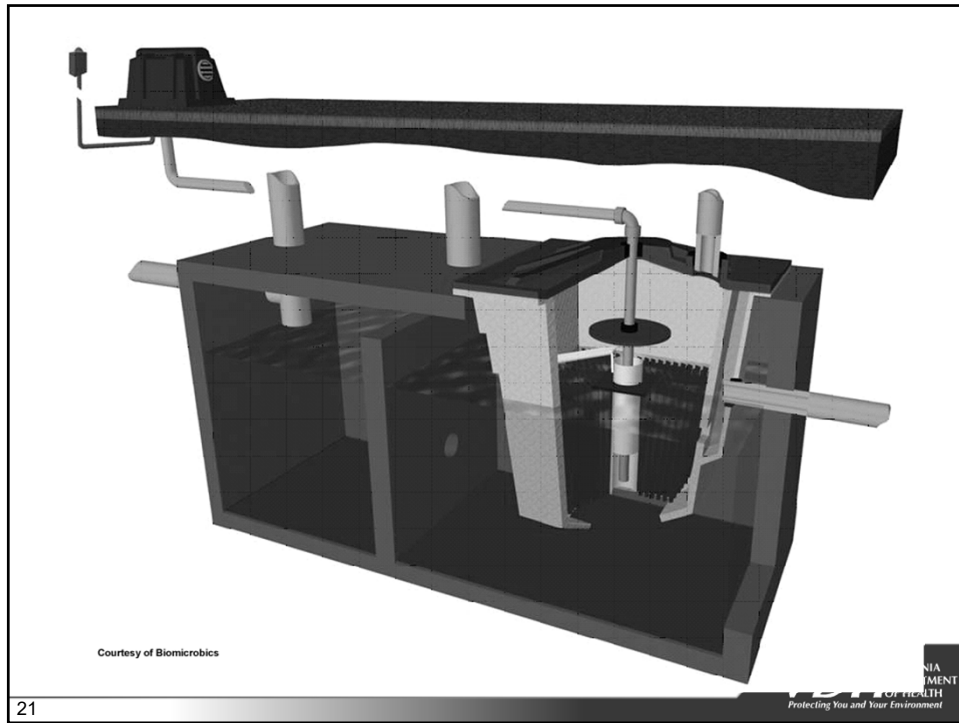
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Parameter	Septic Tank	TL-2	TL-3
BOD ₅ , mg/l	200	30	10
TSS, mg/l	150	30	10
Nitrogen, mg/l	60	48	48
With N reduction	NA	30	30

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Peat Fiber Filter Module



AdvanTex™ Textile Based Filter





Network of Small Textile Filter Units at a School



Alternative Onsite Sewage Systems

Difficult sites

- Slowly permeable soils
- Shallow depth to a restriction
- Limited areas

Repairs/Housing improvements to renovate a failed drainfield

Upgrade existing system for better treatment/longer life

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Regulations for alternative onsite sewage systems

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Regulatory Background

- Originally onsite systems only regulated through the Sewage Handling and Disposal Regulations
12 VAC 5-610
- Administrative practices
- Soil and site evaluation techniques
- Conventional designs
- Designs for a few alternatives (LPD and mounds)
- Focus on small systems

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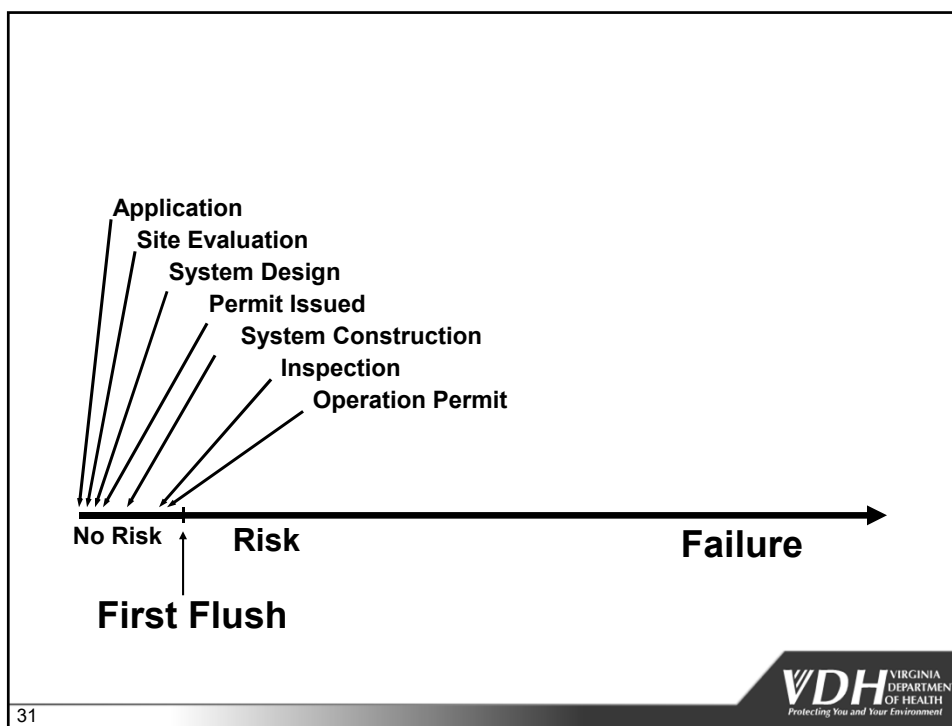
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Sewage Handling and Disposal Regulations 12 VAC 5-610

- Prescriptive site and soil conditions
- Prescriptive designs
- Prescriptive loading rates
- No area reduction for higher effluent quality
- No operation and maintenance
- No follow up

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Goals for a new regulation

- Recognize higher levels of wastewater treatment
- Reduce vertical separation to limiting features by increasing the quality of the wastewater applied
- Provide increased loading rates to soil dispersal systems for treated wastewater
- Require operation and maintenance for AOSS
- Formally require control of nitrogen
- Add in special conditions for designs by professional engineers

Regulations for Alternative Onsite Sewage Systems (AOSS Regs)

- 12 VAC 5-613
- Effective December 7, 2011
- Chesapeake Bay Total Nitrogen (TN) limits effective December 7, 2013

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Regulations for Alternative Onsite Sewage Systems

- Part I: General (and Administrative) (10-70)
- Part II: Performance Requirements (80-110)
- Part III: Operation and Maintenance (120-190)
- Part IV: Horizontal Setback Requirements (200)
- Part V: Waivers from Certain Performance Requirements (210)

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Part I - General & Administrative

Key parts

- Upholds 12VAC5-610 where not superceeded here
- Violations and Enforcement
- Requirements for operations permits
 - Recordation of O&M
 - N dilution area
 - Renewable permit for large systems

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PART I - DEFINITIONS

- | | | |
|-------------------------------------|------------------------------------|---|
| • AOSS | • Operator | • Total Nitrogen |
| • BOD | • Owner | • Total Residual Chlorine |
| • Conventional Onsite Sewage System | • Organic loading rate | • Total Suspended Solids (TSS) |
| • Disinfection | • pH | • Treatment Level 2 Effluent or "TL-2 Effluent" |
| • Dissolved Oxygen | • Project Area | • Treatment Level 3 Effluent or "TL-3 Effluent" |
| • Effluent | • Reportable Incident | • Treatment Unit |
| • Large AOSS | • Saturated Hydraulic Conductivity | • Turbidity |
| • Limiting Feature | • Settable Solids | • Vertical Separation |
| • MGD | • Small AOSS | |
| • Maintenance | • Soil Treatment Area | |
| • Operate | • Subsurface Drainfield | |
| • Operation | | |

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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

AOSS vs Conventional

Conventional consists of “one or more septic tanks with gravity, pumped or siphoned conveyance to a gravity distributed drainfield”

If it doesn't fit this definition and its not a point source discharge, it's an AOSS

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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

TL2 and TL3 (Treatment Level)

- TL 2: 30 mg/l BOD5 and 30 mg/l TSS
- TL 3: 10 mg/l BOD5 and 10 mg/l TSS

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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

Small vs Large AOSS

- Small AOSS : less than or equal to 1000 gpd
- Large AOSS: greater than 1000 gpd

- NOTE: AOSS's with flows over 10,000 gpd require an operator with BOTH and AOSS license and a wastewater works operator license

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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

Limiting Feature

- A feature of the soil that limits or intercepts the vertical movement of water, including seasonal, perched or permanent water table, pans, soil restrictions, and pervious or impervious bedrock.

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High Shrink
swell Clay



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Part I - Definitions of Note

- AOSS vs Conventional
- TL2 and TL3
- Small vs large AOSS
- Limiting Feature
- Vertical Separation

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Part I - Definitions of Note

Vertical Separation

- The vertical distance between the point of effluent application to the soil or the bottom of a trench or other excavation and a limiting feature of the soil treatment area such as seasonal high ground water, bedrock, or other restriction.

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General Approval Testing and Evaluation: section 70

Gives authority to develop policy to verify performance of treatment units for TL2 and TL3

TL3 protocol to include:

- 20 units installed at single family homes
- Test BOD and TSS quarterly for one year
- Allows for O&M
- Oversight by 3rd party

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Part II - Performance Requirements

- 80-90 Design Requirements
- 100 -110 Sampling Requirements

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Part II - Design Requirements

- Loading Rates
- Effluent Quality based on vertical separation to a limiting feature
- Total Nitrogen (TN) requirements

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Table 1

Maximum Pressure-Dosed Trench Bottom Hydraulic Rates

Percolation Rate (MPI)	Saturated hydraulic conductivity (cm/day)	TL-2 Effluent (gpd/sf)	TL-3 Effluent (gpd/sf)
≤15	> 17	1.8	3.0
15 to 25	15 to 17	1.4	2.0
>25 to 45	10 to < 15	1.2	1.5
>45 to 90	4 to < 10	0.8	1.0
>90	< 4	0.4	0.5

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Things to Remember About Table 1 from 80.10

- Table 1 is for pressure dosed, trench bottom loading rates only.
- The designer is responsible for reducing loading rates according to the features and properties of the soils in the soil treatment area as well as for reducing loading rates for other types of dispersal.

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Table 2
Minimum Effluent Requirements for Vertical Separation to Limiting Features

Vertical Separation To A Limiting Feature	Minimum Effluent Quality
≥18" (requires naturally occurring, undisturbed soils)	Septic
<18" to 12" (requires minimum 6" of naturally occurring, undisturbed soils)	TL-2
0-12 inches	TL-3 and standard disinfection
<6 inches to groundwater	Direct dispersal - 5/5/5 +

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Nitrogen

- Large AOSS must control N leaching to groundwater for drinking water protection
- All AOSS in the Chesapeake Bay watershed have to control N

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Part II - Sampling

- Field testing to check system
 - pH, flow, TRC, DO, odor, turbidity (visual), settleable solids
- Laboratory sampling for compliance
 - Defined intervals
 - BOD5 and disinfection for small AOSS (1/5 yr)
 - BOD5, TSS, TN, pH, and disinfection for large AOSS

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Laboratory Samples vs Field Measurements, Sampling, Observations

Laboratory samples are potential compliance
samples - for small AOSS 1/5 yr BOD5

Field tests are process control, or operational
tests

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Compliance Monitoring

Parameter	Plant Size	
	>10,000 gpd to 40,000 gpd	>1,000 gpd to 10,000 gpd
Flow	Measured	Measured or Estimated
BOD5, TSS	Grab Quarterly	Grab 1/yr
TN	Grab Quarterly	Grab 1/yr
TRC, end of contact tank	Grab Weekly	Grab 1/yr
Fecal Coliform	Grab Quarterly	Grab 1/yr

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Part III - Operation and Maintenance

Items of Importance

- Licensed operator
- O&M Manual
- O&M Visits (frequency, requirements)
- Reporting

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O&M Involves

- Visit the system at least at the minimum frequency required by the regulations
- Perform operational adjustments, testing, and maintenance as needed to maintain system and in accordance with the O&M Manual
- Maintain log
- Provide reports to owner and VDH by 15th of month following activity

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OPERATOR VISITS \leq 0.04 MGD

Avg. Daily Flow	Initial Visit	Regular visits following initial visit
\leq 1,000 gpd	Within 180 calendar days of the issuance of the operation permit	Every 12 Months
>1,000 gpd to 10,000 gpd	First week of actual operation	Quarterly
>10,000 gpd to 40,000 gpd	First week of actual operation	Monthly

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Horizontal Setbacks: Section 200

For designs by professional engineers only

- Upholds setbacks to drinking water sources/supplies, shellfish waters, sinkholes in 12VAC5-610
- Adds separation to wetlands
- Reduces separation to ditches with in 6 inches of groundwater for treated effluent and treated effluent with disinfection

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Waivers from Certain Performance Requirements: 12VAC5-613-210

Allows a professional engineer to deviate from the soil loading rates (Table 1); the vertical separations (Table 2); and the vertical separation and soil cover requirements for septic tank effluent.

Requires justification

Requires sampling/monitoring to verify

Sets in soil standard of ≤ 5 mg/l BOD5 and fecal coliforms ≤ 2.2 col/100 ml

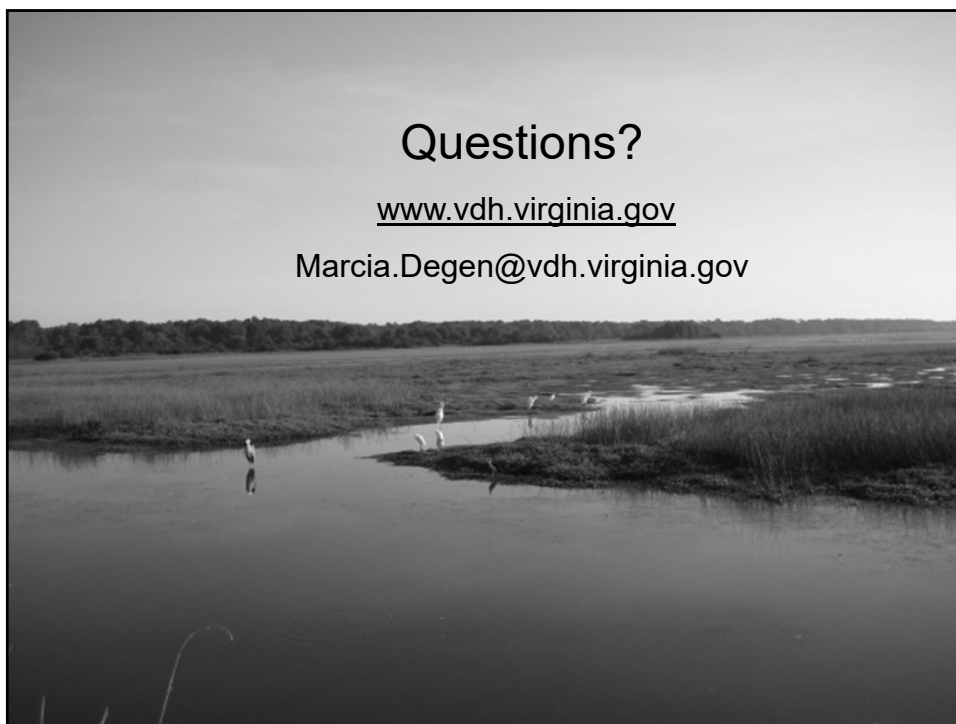
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Questions?

www.vdh.virginia.gov

Marcia.Degen@vdh.virginia.gov



So What's A Periodic Review?



What is a Periodic Review?

§ 2.2-4017. Periodic review of regulations. Requires agencies periodically review their regulations. Exact time period determined by Executive Order.

Executive Order 17 (2014). Every existing state regulation shall be reviewed at least once every four years by the promulgating agency.

A periodic review shall include notice to the public, public comment period (minimum of 21 days), and a result announced (no later than 60 days)

Each periodic review shall include an examination by the OAG

The comment period for this Periodic Review began on January 25, 2016, and ended on February 25, 2016. 34 comments were received

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Public Comments Received



34 comments received. Three main provisions most comments focused on:

- 12 VAC5 613-70, General Approval Process, TL3 Standard
- 12 VAC5-613-80 & 90, Loading Rate Charts, Groundwater protection
- 12 VAC5-613-100, Sampling frequency, access to sampling data
- General comments focusing on lack of clarity and enforcement of O&M

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Workgroups Formed

Primarily from SHADAC and others who expressed interest

- Formed 3 workgroups initially to brainstorm ideas based on 12 VAC5-613-70; 12 VAC5-613-80 & 90; and 12 VAC5-613-100 amendments
- Each group tasked with coming up with ideas for amendment for respective provision

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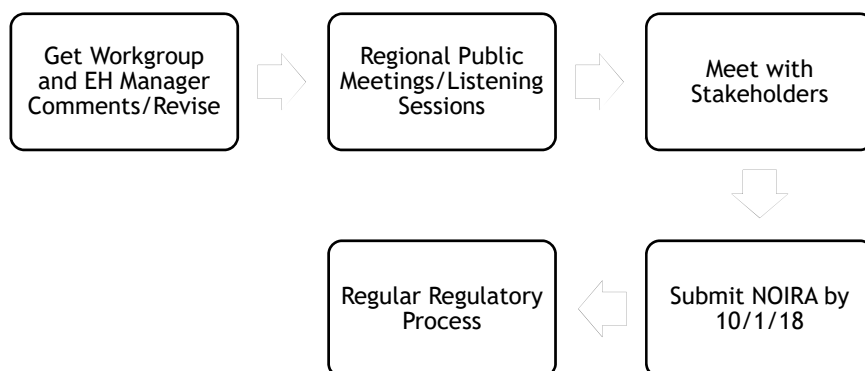
Workgroup Meetings



- So far, we have held meetings on 5/17/17, 5/24/17, 9/20/17, and 11/1/17.
- Minutes Posted on Townhall.
- After each round of meetings, VDH staff worked on drafting proposed amendments based on brainstorming ideas in workgroups.
- The latest working draft is posted online.

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Plan for AOSS Periodic Review



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Areas of Amendment in Working Draft

Definitions (10)- residential wastewater, soil-like, permeability limiting feature

Applicability & Scope (30)-(K) Small spray irrigation systems are permitted by VDH through an agreement with DEQ. Should we incorporate the spray requirements into this regulation? (L)-(M) no longer needed

Relationship to Other Regulations (40)- (F) DPOR
Licensure number

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Amendments Continued

General Approval & Testing (70) & (75)- Goal of these amendments was to allow acceptance of out of state data in similar climate; allow CBOD5 data; create a de-listing protocol.

Performance Requirements (80)- A lot of clarity amendments and also amendments to the Tables

Performance Requirements (90)-Groundwater Monitoring Procedure added. (D) Clarifying the Nitrogen requirements and eliminating sections that VDH has found through experience is impossible to document

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Amendments Continued

Sampling (100)-clarify purpose of sampling for small systems and sample point; add in enforcement triggers; modify sampling frequency for large AOSS

Operator Responsibilities (120)-Clarify that the requirement is that the operator is 'operating' the system and that at each visit, all operational tests, modifications, etc. are done.

Reports (190)- Requests the Operator's contact info so that VDH can follow-up.

Waivers (210)- Does VDH need this section where it has never been utilized and a variance accomplishes the same thing?

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Comments, Concerns, Feedback

If you would like to speak, please come up to the podium, provide your name, city or county or residence, and the section of the Regulation you are addressing.

If you would rather submit written comments, you may do so either here on provided index cards or send via email to Marcia.Degen@vdh.Virginia.gov or Karri.Atwood@vdh.Virginia.gov.

A link to the working draft of the AOSS Regulations can be found on VDH's website,
<http://www.vdh.virginia.gov/environmental-health/onsite-sewage-water-services-updated/news-of-interest/>

Thank you for your participation!