

Water Quality Division: On-Site Wastewater PPL TWG
Meeting 2: Tuesday, September 14, 2021 9:00-11:00 am
(See Link to Google Meets in Calendar Invite)

Members in Attendance:

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| <input checked="" type="checkbox"/> Ashley Chatfield, Maricopa County Environmental Services | <input checked="" type="checkbox"/> Nicholas Noble, Orenco Systems Inc |
| <input checked="" type="checkbox"/> Bryan Chiordi, Essential Operations | <input checked="" type="checkbox"/> Naveen Savarirayan, ADEQ |
| <input type="checkbox"/> Todd Christianson, Premier Environmental Products, LLC | <input checked="" type="checkbox"/> Michael Stidham, EZ TREAT, INC |
| <input type="checkbox"/> Suzanne Ehrlich, Yavapai County | <input checked="" type="checkbox"/> Michael Sundberg, MST Manufacturing DBA MicroSepTec |
| <input checked="" type="checkbox"/> Marc Fleetwood, Fleetwood Engineering | <input type="checkbox"/> Fred Vengrouskie, Eljen Corporation |
| <input checked="" type="checkbox"/> Karthik Kumarasamy, ADEQ | <input checked="" type="checkbox"/> Joelle Wirth, Summit Environmental, LLC |
| <input checked="" type="checkbox"/> Linneth Lopez, ADEQ | |

Agenda (Est Time)	Lead	Overview	NOTES
Peer States	All	Review the information from other states	<p>Technical Review Committee:</p> <ul style="list-style-type: none"> • Typically, groups consist of peers and competitors and become political • It is cumbersome, costly and opens the door to long delays • North Carolina no longer uses a review committee • Oregon had a typical review committee and changed to the DEQ handling all reviews and convenes the committee only when needed for more detailed analysis, but does not include any manufacturers (rarely meets) • Should only be technical based members • Times when ADEQ may seek outside guidance or specific expertise • Concern about the group being skewed or biased • Colorado does not have any advisory committee. They have a specific list of criteria and you can not deviate. Minnesota became so skewed and far away from the intent of the committee. • Need locals protecting their local environment. • Not sure if ADEQ could establish a review committee without legislative authority and open meeting law would apply. Experience has been that the review committees are established by statute. <p>General comments on what does and doesn't work.</p>

			<ul style="list-style-type: none"> • Set standards (table) and stick to it • Some states have gone to NSF 40 and no additional review/approval without nitrogen or reuse standards • Look at just components not the system • Need to have enforcement to hold people accountable • Credit for in-field testing is good but do not always trust the manufactures testing results • Corrective action is necessary • Are we going to have listing for tanks? • Are we going to separate components from systems? • When there are no appeals processes to address overreach, it is a problem • Continued requirements to test when substantial testing has been done in other states are problematic • How much additional regulatory burden can be added in the rule process. Will need to understand the increased costs to the agency and to the industry and home • By default, ADEQ has a tiered process. Oregon required reapplication and used money for in field testing. Arizona is in a race to zero in PPL and created over reach. Created a market standard and not following our own rules and is subjective. Arizona needs to push a pause button until the new rule is crafted. Arizona needs to test to confirm assertions are being met in the field. • Propensity will reduce some of the burden with continued testing in field • Groves Report has good information • Need to have operations and maintenance to ensure the systems are operating as designed (no system performs when abused) • Data from counties may be skewed because system failures are due to lack of maintenance • Will need to have justification for the changes to the program and the data upon which decisions are being made • Most important element is the ongoing, monitoring, operations and maintenance, and enforcement • Will need to coordinate with O&M and Program Administration sub group in the design/permitting work groups • Log reduction standards to help move to water reuse • Outliers in current PPL – non-priority products which are no longer up to date – need some housekeeping • NSF is where manufacturers go – several states accept the NSF without any other review • North Carolina has an experimental and then conditional status in the PPL process which requires a testing protocol to go to the next level • Reciprocate between states on testing data • Scientific basis of the SAR formula and is more liberal than the capacity of the soil. • NEWIPIIC Report also has good comparisons between test center data and field generated data <p>What do we do with the current PPLs at ADEQ?</p> <ul style="list-style-type: none"> • Set a timeframe, a grace period, have to reapply to get approval under the new rules. • If field sampling, systems may be in pretty bad shape – set age of system to sample.
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Critical To Quality (CTQs)	All	What are the elements of a successful PPL program?	What do we want the end result to be? Let's start from scratch. Identify the ideal future state for Arizona to be number one in the nation. Homework assignments were made to move the group toward this next step. (see Action Plan)
Next Steps	Joelle	Next Meeting: Define an Arizona program which will meet the CTQs and identify the gaps between current state and the ideal future state.	Next Meeting: Two weeks, Monday, September 27, 9 am

Action Plan:

Task	Person Responsible	Due Date	Status
Send calendar invite for the next meeting.	Theresa		Complete
Collated state information and send to members	Theresa	September 7	Complete
Compile CTQ of the future state	Nick		
Outline of what a tiered approach might look like	Karthik		
Send ideas on parameters to Karthik and CTQs to Nick	All Members		
Gather information from County partners on concerns they have about PPLs and the process	Linneth/Joelle		
ADEQ to answer the industry the question about over reach and going beyond the rule today	ADEQ		
Provide Groves Report to ADEQ	Bryan		Completed