



# COMMONWEALTH of VIRGINIA

Department of Health  
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Marissa Levine, MD, MPH, FAAFP  
State Health Commissioner

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October 26, 2015

Mr. Nicholas Noble  
Government Relations Manager  
Orenco Systems, Inc.  
814 Airway Ave.  
Sutherlin, OR 97479

via email [nnoble@orenco.com](mailto:nnoble@orenco.com)

Dear Mr. Noble,

On May 28, 2015, you provided the Virginia Department of Health (VDH) with reports of the NSF/ANSI Standard 40 and 245 testing completed May 2015 on the AX20RT unit. The reports indicate that the unit passed the NSF/ANSI criteria for both standards at a design flow rate of 600 gpd. The NSF website was recently updated (October 2, 2015) to list the AX20 and AX20RT with a rated capacity of 600 gpd. Based on scale-up factors, NSF also lists the AX25RT at a rated capacity of 750 gpd. Units listed on the NSF website are designated with the letter 'N' in their model number, designating units that are sold with the two year maintenance agreement required by NSF. It is understood that units are sold in Virginia without the 'N' in the model number, but the units are the same.

The AX20 and AX20RT are approved as Treatment Level 3 (TL-3) units in Virginia for up to four bedrooms. Given that NSF has certified the AX25RT for a design flow of 750 gpd under NSF/ANSI Standard 40, VDH will extend the AX20RT's TL-3 approval to the AX25RT at that design flow. Note that the AX20RT and AX25RT units must be preceded by 1,200-gallon and 1,500-gallon primary (septic) tanks, respectively, at those rated capacities.

The interim listing for nitrogen reducing units in GMP 156 will be updated to reflect the higher flow rating (750 gpd) for the AX25RT. For clarification, the AX20RT and AX25RT were tested with UV and are identified as such on the NSF 245 listing. Units that do not have the UV component are still considered 50% TN reducing units.

Should you have any additional questions, please feel to contact me at 804-387-1883 or by email at [Marcia.Degen@vdh.virginia.gov](mailto:Marcia.Degen@vdh.virginia.gov).

Sincerely,

A handwritten signature in cursive script that reads 'Marcia J. Degen'.

Marcia J. Degen, Ph.D., P.E.  
Environmental Technical Services Manager

Cc: Kemper Loyd  
Dwayne Roadcap