



# COMMONWEALTH of VIRGINIA

Department of Health  
P O BOX 2448  
Richmond, VA 23218

Marissa Levine, MD, MPH, FAAFP  
State Health Commissioner

TTY 7-1-1 OR  
1-800-828-1120

November 20, 2015

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

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

Dear Mr. Noble,

The purpose of this letter is to recognize a point of clarification that you have requested regarding my October 26, 2015, letter to you. In the October 26, 2015 letter, the Virginia Department of Health (VDH) recognized a 750 gpd design flow rating for the AX25RT based on reports of the NSF/ANSI Standard 40 and 245 testing completed May 2015 on the AX20RT unit. VDH recognizes that 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 extended the AX20RT's TL-3 approval to the AX25RT at the 750 gpd design flow.

In my October 26<sup>th</sup> letter, I noted that the NSF report described a 1,200-gallon primary (septic) tank in front of the AX20 and AX20RT and a 1,500-gallon primary (septic) tank in front of the AX25RT. You noted that VDH had previously approved the AX20 at 600 gpd for TL3 and for 50% total nitrogen (TN) reduction with only a 1,000 gallon primary (septic) tank required. The TL3 approval was based on testing in Virginia. The TN reduction approval was based on testing in Maryland. In both cases only a 1,000 gallon primary (septic) tank was used. You requested that the listings for the AX20 and AX20RT be based on the original Virginia and Maryland testing so that only a 1,000 gallon primary (septic) tank is required for those units. VDH has no objections to maintaining the original approval criteria. The following summarizes the status of each model.

Model	Design Flow, gpd	Minimum Septic Tank Volume, gal	TL3 General Approval	50% TN Reduction
AX20	600	1,000	Yes	Yes
AX20RT	600	1,000	Yes	Yes
AX25RT	750	1,500	Yes	Yes

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,

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

Cc: Kemper Loyd  
Dwayne Roadcap