



COMMONWEALTH of VIRGINIA

Department of Health

DONALD R. STERN, M.D., M.P.H.
ACTING STATE HEALTH COMMISSIONERP. O. BOX 2448
RICHMOND, VA 23218

September 16, 1994

Peter W. Schmidt, Executive Director
Department of Environmental Quality
P.O. Box 10009
Richmond, VA 23240

Dear Mr. Schmidt:

The Virginia Department of Health (VDH) is responsible for the review and evaluation of approximately 32,000 applications for onsite sewage systems per year. The overwhelming majority of these systems are for single family homes. Our goal is to issue an appropriate permit for every site where adequate treatment and disposal can be accomplished. Most of our permits are for conventional septic tank drainfield systems but we also issue permits for elevated sand mounds, low pressure distribution systems, sand filter systems, aerobic treatment units and a variety of experimental systems.

One of the experimental systems that has shown great potential for cost effective onsite wastewater treatment and disposal is spray irrigation. With this letter I am sending a copy of a research report prepared by Virginia Tech that describes their work and findings. I am sure you and your staff will find these results most interesting.

At the present time, the Department of Environmental Quality (DEQ) handles all permitting of spray irrigation systems. The process used is appropriate for commercial and large scale domestic spray irrigation projects but tends to be cumbersome and expensive for individual homeowners and small flow domestic wastewater generators. My comment is offered strictly at face value and is not intended as a criticism of DEQ practices. I realize that the vast majority of spray systems are for large scale wastewater generators which the process serves well. By design and practice VDH is designed to serve individuals, families and small scale wastewater generators.

It appears to me, and I offer for your consideration, that with respect to wastewater treatment and disposal, that DEQ is best suited to serve industry and VDH is best suited to serve individuals. Therefore, I would like to propose a division of customer services whereby VDH would take over all aspects of

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permitting small flow spray irrigation systems while DEQ continues to regulate larger wastewater generators. In this manner, the existing resources of the Commonwealth would be used to better serve both customer bases.

Specifically, I would like to propose VDH handle the permitting of all spray irrigation systems that meet the following criteria:

1. Average daily flows of less than or equal to 1,000 gallons per day (GPD).
2. Domestic wastewater only.
3. Only sites that could preclude effluent reaching state waters would be permitted.

Preliminary discussions between Mr. Donald Alexander, on my staff, and Mr. Larry Lawson, on your staff, have shown there is preliminary interest in this concept at both DEQ and VDH. We would be more than willing to include DEQ staff on the planning and development aspects of this proposal if you accept it. In fact we would encourage such cooperation to assure that the missions of both agencies are met.

One of my primary concerns is that of meeting the needs of our customers. Mr. Alexander informs me that we could include spray irrigation under our current onsite sewage regulations (Sewage Handling and Disposal Regulations) and be able to offer the public several important benefits. Among these benefits would be the following:

- * Ability to permit some sites that we cannot now permit.
- * Reduced permitting costs and elimination of renewal fee costs.
- * More timely permitting.
- * System designs that meet the needs of residential users.
- * One stop permitting for small flow wastewater generators.

As you may know, there is a history of VDH and DEQ cooperating on small flow systems. The sand filter systems and aerobic units mentioned in the first paragraph are handled jointly between DEQ and VDH. DEQ has issued a general permit which establishes discharge limits and appropriate locations where discharges may be introduced into state waters. VDH issues construction and operation permits and conducts routine monitoring.

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We view this proposal as a logical expansion of our cooperative oversight arrangement and suggest that it can be accomplished within the framework of our respective grants of authority in the Code of Virginia. We believe this change would benefit the public, provide excellent environmental and public health protection and eliminate some bureaucracy for homeowners. If you would like DEQ to enter into a cooperative agreement, please let me know. I look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald R. Stern, M.D., M.P.H.", written in a cursive style.

Donald R. Stern, M.D., M.P.H.
Acting State Health Commissioner