Comments on May 2021 Draft of FAST Track to Amend Sewage Handling and Disposal Regulation, 12VAC5-610. Comments gathered from Sewage Handling and Disposal Regulation Advisory Committee meeting, emails, and VOWRA training event

880.B7 – Regarding height of control panel.

* The 30 to 42 inches from the ground surface is too specific.
* Suggest minimum of 30 inches from ground surface/final grade with no maximum
* Electrical code requires 28 inch minimum heigh from finish grade
* Some manufacturers will void warranty if less than 36 inches.

880.C – Pumps integral to treatment systems. “Conveyance pumps that are located in units with multiple compartments are not considered integral to the treatment unit”

* Concern that the statement in red does not restrict the use of recirculation pumps that recirculate and discharge (dual purpose
* Intent is that often treatment units are sold with integral pump tanks for final dispersal. Those final dispersal/conveyance pumps are not integral to the treatment process and therefore are not eligible to be considered under this section.
* Consider “Pumps Integral to Treatment Systems including Recirculating/Discharge Combinations:”

800.D.2 – ¼ day emergency storage above high level alarm

* Recirculating media filters can store in the recirculation tank and this option should be considered and allowed. Should consider also backing up in the upstream septic tank as well.
* Suggestion: An alternative to quarter day storage can provided elsewhere in the treatment train, however backup into the septic tank is not recommended. The purpose of the ¼ day storage in the pump tank is to all for flow to continue to accumulate without impacting the function of the septic tank.

950.C – installing below a restriction with treated effluent

* You can already go below a restriction with treated effluent. This amendment would gain a slight reduction in separation distance. Too controversial. Suggest dropping it.
* SHADAC polled – no objection to dropping this modification. No change to this section and will revert back to original language.

960.F. Alternate New Section – relating to dose volume

* This is for gravity dosing – make that clear.
* General agreement that a max of 6 doses per day is reasonable.

960.J. – Pad Construction

* Need to add minimum gravel depth like we have for trenches
* Is fabric required over gravel and distribution pipe?
* Does the distribution pipe need to be covered with gravel or just sit on top?  Standard pipe like used in trenches w/ holes down?
* Amount of pipe required?  right now the way I see it a 4" distribution pipe gets credit for 3' of dispersal area b/c that is what a gravel trench is.  I don't know what a good number is but 3 may be too small and 9 is probably too much to achieve even-dispersal across the pad.
* Above commenter noted that referenced section should cover, but still thinks there should be a specification on how far from the edge of the pad and how much pipe is required. Suggests 4 feet of infiltrative surface (on either side) of 4 inch pipe.
* Cover should be 4 inches, not 6 inches.