Comments Received from August 18, 2021 SHADAC meeting on Fast Track Regulations

**Proposed Fast-track Amendments to the Sewage Handling and Disposal Regulations**

12VAC5-610-950K – Introduced revised language. Same language for cover added to pads and mounds.

*3. The minimum soil cover over the absorption area after settling is 6 inches~~.~~  On sloping sites, cover shall be tied back into the existing slope to facilitate stabilization of the slope and maintenance of the site. The soil cover, with amendments as needed, shall be of a quality, character, and fertility suitable to establish a vegetative cover that is uniform and sufficiently mature to survive and inhibit erosion.*

SHADAC – who is the arbitrator of how much cover is 6” “after settlement’.  Is it 9”, 12”?

VDH –The arbiter is the designer and installer to determine how much they need to add to accomplish the final depth of cover.

SHADAC – Do you think we need to say something about class IV soils for cover.  Is what the designer specifies the guide for the install.

VDH – Excluding Class IV has been briefly discuss and there was pushback on that issue so we opted to not exclude it. But Yes, the designer can specify something better. The regs are a minimum requirement.

960 – Elevated sand mound. – reviewed modifications intended for clarity.

*A. An elevated sand mound is a soil absorption system that incorporates pressure distribution and sand filtration to produce treated sewage prior to absorption in the natural underlying soil. The elevated sand mound utilizes less gross soil area than most other soil absorption systems. Elevated sand mounds differ from pads in that the infiltrative surface follows the natural ground surface and contour of the site, are always an above ground system, may receive septic tank effluent and always require pressure distribution.*

Trying to draw a distinction between mounds and pads in that the “infiltrative surface of mounds follow the natural ground surface” while pads are cut into a site and have a level bottom. Mounds are always above ground.

SHADAC – The wording is confusing. Not sure if the descriptors apply to mounds or pads. Reiterate that the mounds have those descriptors. Suggestion: “in that ELEVATED SAND MOUNDS follow….”

966 - Pads

1. *The longest dimension of the basal area of the pad, its length, shall be oriented parallel to the natural surface topographic contours. Minor deviations from surface contours are acceptable as long as the bottom of the pad is level (the entire bottom surface of the pad is at the same elevation,* ***plus or minus 2 inches****), and intersects a similar soil horizon across its surface.*

At the last SHADAC there was a lot of discussion regarding the wording that describes how pads are oriented. Drawings and suggested language were sent out previously and the first sentence is what was developed.

First sentence was accepted. No further discussion.

Reviewed added language to define ‘level’ for the bottom of the pad. The +/- 2 inches came from GMP 147.

SHADAC – I think the level issue could be expressed as a percentage of the depth of the pad.  Maybe 10%, up to 2”.  So that really shallow pads can’t be 2” out of level.  I think that is a reasonable outer limit.

VDH will consider and make modifications.

1. Pads and trenches may be used together in a single system when the respective pad or trench subsystems ~~each zone~~ follow the respective design criteria found in this chapter and are separated by a minimum of 6 feet between the sidewall of the pad and the trench. When multiple pads are used on a site, the pads must be separated by the width of the pad as measured perpendicular to the natural surface topographic contour.~~the slope.~~. This separation applies to reserve pad areas as well..

The first sentence was modified to address a comment regarding what is a zone.

GMP 147 did not allow you to use pads and trenches in the same system.  VDH cannot see why you couldn’t as long as it is designed properly.   Added language “follow the respective design criteria found in this chapter” for clarification.  Also old GMP said pads had to be 20 feet apart.  VDH is proposing the width of the pad and applying the separation to the reserve area as well based on comments from the last meeting.

SHADAC – With the reserve area issue, if the reserve is upslope maybe that is an exception.

VDH – we left that in based on concerns that when the reserve is right next to the primary you have to drive over it to install the primary and may damage it.

SHADAC – I question, when we do pads lately we use GeoMat.  They have options for stepping pads.  On a recent repair the pads were 3 feet apart, but the pads were 10 feet wide.  If we had to keep them 10 feet apart we never would have meet the 10 foot standard.  Would have been hard to fit everything in.  I can see that kind of separation with mounds, but when you are in the ground with pads not sure it is as necessary.

SHADAC – Think the reserve issue is more about install depth.

VDH – If the reserve is upslope, do you think it doesn’t matter as much.

SHADAC – If you are allowing a trench 6 feet below, what is the difference with a pad?

SHADAC – only reason I broke up the pads was because of slope.  On shallow install can’t go wider with shallow install.

Maybe the out is if it is designed by a PE that you don’t have to follow it.

VDH - GMP 147 required 20 feet.  The width of the pad is less restrictive.

VDH – An option would be to allow a deviation from the separation width for designs following a manufacturer’s approved manual. (in H.d.)

Do we want to specify that a reserve pad must be up slope?

SHADAC – that is what I tend to do.

SHADAC – so we have an active 20 foot wide pad, and 6 feet below it we have an active 3 foot wide trench.  So if my reserve is trenches, you’d hold me to 6 feet, but if its pads you’d hold me to the wide of the pad.

VDH – could consider reducing the separation distance if the pad is upslope to 6 feet.

Lance – VDH will bring the revised document back one more time to SHADAC.  VDH will check on timing and see whether we need a special meeting, or if we can do this at the October SHADAC meeting.