

SSTS Technical Advisory Panel for Product Registration

Meeting Notes from June 24, 2008

MN Dept of Administration, Room 116C

Meeting Attendees

Committee Members	Guests
Ed Kerzinski	Karl Goetter
Mitch Johnson	Brian McQuestion
Loren Kohnen	Mike Sundberg
Kemp Ritter	Curtis Cluckey
Sara Christopherson	Dean Person
Mike Frauenkron	Paul Flynn
Bob Whitmyer	Doug Fessel
Greg Halling	Tony Birrittieri
	Kurt Christopherson
MPCA Staff	Kevin Kloepner
Barb McCarthy	
Gretchen Sabel	
Mark Wespel	
Bill Priebe, Supervisor	
Leah Hedman, Attorney General Office	

Welcome and Introductions

The Technical Advisory Panel (TAP) meeting began at 10 am with introductions and review of the Agenda. Barb McCarthy reviewed the membership list with the group. The goal was to have representation from each SSTS discipline with representation across Minnesota.

TAP Meeting - General Operating Practices

Ground Rules:

Gretchen Sabel presented the SSTS Advisory Committee's ground rules as a starting point for TAP's consideration. Discussion points included:

- What is the term for the members? *Not specified, indeterminate*
- Should there be attendance criteria? *Please let MPCA know if you won't be there; otherwise make a good effort to attend. All are needed.*
- What is the meeting frequency? *OK with monthly meetings, then as needed. Phone meetings are allowed and may be necessary from time to time.*

- Should we allow alternate members? *No, not appropriate since each is representing themselves as members of a discipline, not necessarily an organization.*
- Should the TAP want to elect a chair? *Yes.*
- What is the decision making process? *Discuss thoroughly before vote so that all sides are heard and all understand. Members may share their views before the meeting if they will not be in attendance and staff will make sure all are aware of them. A vote will be made; this recommendation would then be provided to the Agency.*
- How do we ensure information gets out there to practitioners and LGU's? *MPCA will investigate use of an electronic bulletin board or some other means.*
- For voting members, what is a quorum? *Go for "majority" now, no quorum.*
- How to deal with incomplete applications? *MPCA will review for completeness. Incomplete applications will be sent back and the 60-day period will begin anew.*
- How will applications be tracked? *By MPCA in a spreadsheet which will be shared with TAP members.*
- Will the TAP review all applications before listing? *Yes*
- What is the relationship of TAP with the SSTS Advisory Committee? *The TAP and the Advisory Committee both provide advice and support to the MPCA. TAP advises MPCA directly then reports to Advisory Committee with communication through SSTS AC representative. If MPCA does not follow the TAP or SSTS AC's advice, MPCA needs to explain how their response differed and why.*

The Ground Rules will be revised based on this discussion and presented to the TAP at the July 24, 2008 meeting.

Meeting Dates and Location:

The TAP was OK with meeting in the Capitol Complex. Dates for subsequent meetings should be discussed and set at the end of each meeting. Next meeting is July 24, 2008. Sara Christopherson cannot attend, but she will find someone from the University of Minnesota to attend.

Website:

Is it OK to post the names of TAP members here? Yes. MPCA will be responsible for maintaining the website.

Election of Chair:

One person was nominated for chair, Bob Whitmyer. All voted in favor.

Roles:

Barb McCarthy reviewed the draft roles document provided in the meeting packet. Discussion followed.

- Is the TAP a subcommittee of the SSTS Advisory Committee? *No, it's more of an adjunct committee in that it directly advises the MPCA but does report its actions to the SSTS Advisory Committee. The Advisory Committee may raise any concerns about decisions or the process.*
- Communication with the industry, especially regulators, needs to be quick; MPCA's role here needs to be clear. *MPCA should send out a summary sheet for each registered product as soon as it is listed; this may take the form of the letter from MPCA to the vendor that confirms the listing.*

Overview of Product Registration Process

Barb McCarthy provided an overview of the product registration process. This included an overview of the current website, the applications for treatment and distribution products and the fact sheet. An overview of the process was provided using a powerpoint presentation.

There was discussion regarding the process.

- For distribution media, what specific protocol needs to be met? The current answer is there is none at this time; NSF is in the process of developing a standard. Therefore, this will be a challenge for TAP in its determination of downsizing. The industry said that other states have protocols that were passed.
- Media and mound sizing – bottom area only for beds. So, it will be the same footprint as a mound rockbed. Submitted manuals can have the drawings for how to put into mounds, at-grades etc....
- List of Registered Treatment Products - What does the listing look like? Both treatment and distribution products are combined in Washington's list, do we want separate list?
- Washington's list is a bit different than ours (category names, and N and P treatment). Categories and treatment levels are different. Categories are domestic and high strength and treatment levels are A, B and C.
- So, those in high strength waste, they will only try for treatment level C. Sara said we need three categories. Flow numbers should be listed as rated capacity, and is this max or average flow? So, the current listing is confusing to permitting. Need to transfer the flow into bedrooms. Shouldn't come up with different flow numbers than what we have. Should we use a range? The designer should think thru the flow amounts. The process would say what the rule says, what is the purpose of the list? Why does the rated capacity say, what does it mean? The list must be useful, so you need a rating capacity. List residential separately than commercial. So, just say high strength and domestic, don't say much else. They have one recommended standard and guidance document. Start with one and expand in the future. Treatment train is included in the registration.
- Just a couple of pages of media products. How to denote the sizing, keep the same as it is or go with reductions? Add column of reduction if given. Use to doing

the sidewall credit. Or each chamber listed with the reduction or what the standard size is. Some of the listing is somewhat extraneous and unnecessary. Adds to the confusion. Some states are just giving a sizing number. Ok to move to this type of sizing. No current guidance on drip dispersal.

- How to deal with Elgin, who claims both treatment and dispersal? The manufacturer should verify, also drip might claim P reduction. Sara want's simple, not a book. List in back is important, not all the numbers. So, table with treatment level A, B and C.
- Approve by the technology, not each size of the component, by the process. Volume should not make a difference. Greg disagrees, for each product, except for adding another component. NSF certifies one size and then allow certification base on the end-point 1500 gpd. Come with a draft table for next meeting. Mike crafted a table. Will separate treatment and dispersal to start with.
- Have a glossary of terms. Need tech guidance. What about remediation technologies? We only have a few sentences in the rule related to remediation. What about a tank listing and water conservation?
- Yellow sheet, 3 listings tanks, etc..... . Use MSA documents and proprietary products start right away.
- Tanks, bunch of stuff they must meet.
- Ok to put drip under distribution media, may have differences in installation. MSA are books, not really guidance documents. So, have great inconsistencies between MSA and proprietary information.
- Bring MSA documents to this panel – perhaps July 24th meeting if ready to review.
- Recommended Standards and Guidance will include information related to installation standards (list contained in 7083.4000 Subp. 1.C.).
- Started to review a flow chart, not completed (green sheet).

Open Forum

Sizing chart must be done for media. Meet treatment levels with UV in the treatment train? If you meet B and UV light is tested at B, then need to retest? No, if UV light is tested at a quality, then OK. Question is whether it needs to be tested? No. Tannins from peat filters may not work as well with UV than with another filter w/o tannins. Sara, if effluent is the same, then the UV approval should be transferable.

Any feedback on renewal? Bob is rethinking based on interactions? What are the testing requirements after it is put in the ground? Operating permits must be specific and get some data. Need to provide guidance to local units of government on compliance and operating permit requirements. If not using NSF standards for operation, then what is the compliance levels? Then how long do you have to come back into compliance? Is it based on annual average compliance or individual values? All issues should be spelled out in the operating permit. Other states have stuff in codes and did not follow up with

requiring field data. Need a starting point (doable) otherwise no compliance. What about start-up compliance? Small number of housing units could complicate the issue. One manual has an 8-week start-up, is that OK? Especially for seasonal with intermittent use? Mass study indicates that system will not be compliance 100% of the time. So, support timed dosing to ensure better treatment. So, what is the acceptable variable? Instead of sampling, have better indicator operational care and maintenance. System owners do not like service provider visits, ask “when is this scrutiny going to end?”

There is lots of work to do; we hope all will stick with it July 24th from 10:00 to 3:30. Hand outs will be out 1 week before the next meeting along with parking permits. We expect the next meeting to have 1 or 2 applications. MPCA needs to send out applications as soon as ready.

Next Meeting Date

July 24, 2008 from 10:00 – 3:30 Capitol Complex.

Meeting ended at 3:20.