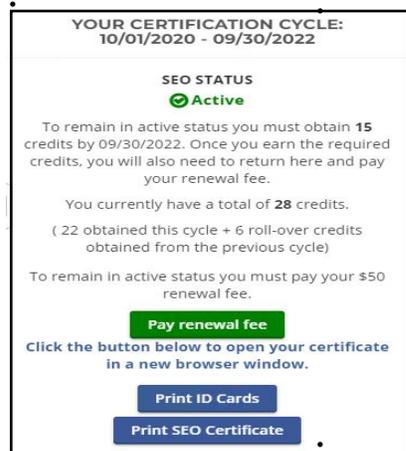


August 22, 2022

Dear Sewage Enforcement Officer (SEO),

It has been over a year since our last *All SEO Letter* on May 18, 2021. The Department has several new items to bring to your attention along with a few reminders.

1. **SEO News** – The Department has routinely communicated important information to the SEO community through *All SEO Letters* (ASL). These ASL communications have been emailed to all active SEOs for the past five (5) years. Moving forward, you will receive important updates and new information via emails sent from an account entitled *SEO Alert*, which will originate from the *PA Clean Water Academy* (CWA). The emails will have a subject line listing the topic and will be sent to all active and lapsed SEOs. Please make sure to check your spam folders for these emails. **Note, in the next few days you will receive important information concerning the Application for an On-lot Sewage System Permit (#3850-FM-BCW0290) through the CWA SEO News. Please look for it.**
2. **SEO Certification Renewal and Requirements** – The current certification cycle will end for most SEOs on September 30, 2022. Certification renewals are now being processed electronically on the CWA (<https://pacleanwateracademy.remote-learner.net>). Once you have acquired your requisite 15 continuing education credits, a green “payment” button will appear in your SEO Block prompting you to pay your \$50 renewal fee. Payment can be made with a credit card. Your current number of continuing education credits will be displayed on your SEO Block. This is a screenshot of the SEO Block.



Please note the following:

- Effective December 12th, 2020, all lapsed SEOs returning to active status and new SEOs are on a 2-year rolling certification cycle based upon the date they became actively certified. If you fall into this category, you will not have a certification cycle that will end

on September 30, 2022. Everyone's certification cycle end date is displayed in their SEO Block on the CWA. You are responsible for meeting your renewal requirements by that date or your certification will lapse.

- As of December 12, 2020, you may roll-over a maximum of three (3) credits into your next cycle.
 - Please note that once you pay your renewal fee, the green "payment" button will disappear. Your current cycle date and other information will not change until the end of your cycle. For example, if your cycle ends September 30, 2022, the information in your SEO block (your new cycle dates, your new rollover credits and total credits needed to remain active) will not update until October 1, 2022.
 - Please note that if you take a course twice in one cycle, credits will only be accrued for the first time taken. In addition, your record of learning will only show the second time that you took the class if it is in a different calendar year.
 - All currently certified SEOs who have not successfully completed a Department approved advanced soils course, either DEP #109 *Advanced Soils* or the current *Precertification Soils Course* offered by SoilHub, must do so by December 12th, 2025 or your certification will lapse. Please visit the CWA for information regarding the SoilHub *Precertification Soils Course*.
3. **CWA Tutorials** - Every SEO must take two (2) short tutorials on how to use the CWA. You should have previously received notice of these requirements and may have already taken the tutorials. If you have not, you can access the following tutorials in the CWA:
- *Webinar – Navigating your SEO Account in Clean Water Academy*
 - *Navigating Your Clean Water Academy Account for SEOs (2021)*
- If you still have questions after completing the tutorials regarding your certification status, credits or renewal, please send your questions to RA-seotrng@pa.gov.
4. **Act 34 Frequently Asked Questions (FAQ)** – The Department provided clarification on the implementation of Act 34 of 2020 in an FAQ document. This document was sent to SEOs in an *All SEO Letter* on May 18, 2021. Based on feedback received following posting of the FAQ, a modified FAQ was posted on October 13, 2021, which made the information in the FAQ clearer. You can find the FAQ on the CWA (<https://pacleanwateracademyremote-learner.net>) or the SEO webpage on the Department's website (www.dep.pa.gov/Business/Water/CleanWater/WastewaterMgmt/Act537/Pages/SewageEnforcementOfficers.aspx).
5. **Bio-Sun Systems, Inc.** – Bio-Sun Systems, Inc. is no longer in business. For the past three (3) years, their alternate technology composting toilet has not been in production. This composting toilet was Department alternate system listing #A2014-0012-0002 and has been removed from the Department's webpage.

6. ***The Pennsylvania Sewage Facilities Act*** - You can always find the latest version of Act 537 on-line (<https://www.legis.state.pa.us/WU01/LI/LI/US/PDF/1965/0/0537..PDF>).
7. ***Best Technical Guidance (BTG)*** – BTG is a powerful regulatory tool which may provide SEOs the ability to address malfunctions. The application of BTG is limited to allowing a variance of horizontal isolation distances to allow for repair of malfunctioning on-lot systems when necessary. It has been brought to DEP’s attention that BTG is not always being applied in accordance with the regulations and policy. The following are two (2) examples of inappropriate use of BTG:
 - **BTG does not allow for a variance in the vertical isolation distance to a limiting zone (LZ).** If you are looking to replace a malfunctioning on-lot sewage system and there are unsuitable soil conditions (<20” to the LZ or <10” to a SHWT / <16” to a rock LZ for a spray field) for a conventional system, you may not use BTG to overcome this limitation. For example, if you have a LZ at 17” and you need 20” of suitable soil for a sand mound, you may not add an additional 3” of sand to overcome this issue under the guise of BTG. You should look to replace the malfunction with either a shallow limiting zone alternate system, a small flow treatment facility or a holding tank. The use of a technology on LZs that the technology is not approved for would require review by the Department and if appropriate, classification as an experimental system.
 - **BTG does not allow for modification to the design of the system.** The alternate systems classified by the Department are classified based on an approved design. Any changes to the design require the Department to review and classify the altered design. For example, if you are looking to modify the minimum length to width ratio design requirement of the absorption area, you would submit the design to the Department for review and if appropriate, classification as an experimental system.
8. ***Soil Profile Descriptions*** – As required by 25 Pa Code § 73.14(3) “...A description of the soil profile shall be recorded on the site investigation and percolation test report form for onlot disposal of sewage issued by the Department.” This specifically requires the use of the *Site Investigation and Percolation Test Report for Onlot Disposal of Sewage* (#3850-FM-BCW0290A) for each individual soil probe. The Department routinely receives soil profile descriptions from consultants that use their own version of the form or include information for multiple soil probes on a single form. This is an unacceptable use of the Department’s form. Modified or improperly utilized forms will not be accepted by the Department, so please dispose of any modified forms; you can obtain the latest version of Department forms from your Department of Environmental Protection Regional Office or the Department’s eLibrary website.
9. ***Adding Additional Bedrooms to an Existing House*** – When increasing the sewage flows from an existing house by adding additional bedrooms, the SEO must verify that the sewage disposal system meets the standards established in Chapter 73. That means the size of the absorption area and the septic tank must be large enough for the increased flows or they must be brought up to Chapter 73 standards. Enlargement of absorption areas may present difficulties associated with soil compaction. Depending on the soil conditions at the site,

some options to consider might be: 1) use of an aerobic tank to take a 1/3 reduction in the required square footage of absorption area needed; or 2) installation of a new properly sized absorption area and abandonment of the undersized one.

10. **Aerobic Tanks and Absorption Area Reductions** – Aerobic tanks must be NSF 40 Class 1 certified in order to take a 1/3 reduction in the absorption area size.
11. **Aerobic Tank sized to treat greater than 1500 gpd** – Aerobic treatment tanks that exceed 1500 gpd cannot be NSF/ANSI certified; therefore, they cannot meet the requirements in § 73.32 *Standards for aerobic treatment tanks* and cannot be permitted by an SEO. Projects proposing the use of aerobic treatment tanks, units or other technology not certified by NSF/ANSI must be permitted by the Department.
12. **NSF/ANSI Certified Units** - All aerobic treatment tanks and units must have the NSF “mark or seal” before the tank/unit can be installed as per § 73.32(b)(1); the SEO must verify this at time of installation. Units without the “mark or seal” are not NSF certified and must be rejected. This is the NSF 40 mark:



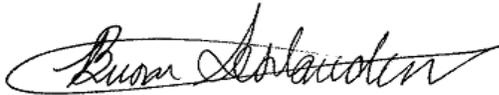
REMINDERS

1. **On-lot Alternate Technologies** – The Onlot Alternate Technology Listings replaced *The Alternate System Guidance* (DEP #362-0300-007), often referred to as the ASG. The ASG was rescinded in March 2014 and should not be used for any planning or permitting of on-lot systems. The Onlot Alternate Technology Listings can be found on the Department’s website (<https://www.dep.pa.gov/Business/Water/CleanWater/WastewaterMgmt/Act537/OnlotDisposal/Pages/OnlotAlternateTechnologyListings.aspx>).
2. **SEO Seals** – Some SEOs are still attaching “seals” to official correspondence relating to Act 537 matters. The use of a “seal” on documents signed or written by an SEO implies that the seal is an official seal and that its use is authorized by the Commonwealth, which is not the case. SEO certification differs from a license issued by the Commonwealth to certain professionals such as engineers and geologists. Licensing statutes for professional engineers, geologists and certain other professions specifically authorize them to use seals and many laws and regulations require that such professionals attach their seals to various documents. An SEO in active status, on the other hand, is issued a certificate by the Department. There are no laws or regulations which require that a document be “sealed” by an SEO. Accordingly, **do not attach a seal to an SEO’s official correspondence or in permitting actions.**

3. **E-mail Addresses Used for Your CWA Account** - Your e-mail address is the official link that associates you to your CWA account. The system will not allow you to use more than one address affiliated with your account. The singular e-mail address you choose is our main point of contact to you and your training activity tabulations, which are finalized using this address. This should be the e-mail address that you provide to training sponsors since it is used for SEO training record verification and to push your completion and credit information to your account. It is highly recommended that you maintain an e-mail account specifically for your SEO profession and promptly let us know if it changes. Changes to your email address can be accomplished through the CWA. If you need assistance, please send your questions to RA-seotrng@pa.gov.
4. **All SEO Letters** – Current and historical *All SEO Letters* can be found in the CWA (<https://pacleanwateracademy.remote-learner.net/>). After logging into the CWA website, go to: Resources, Sewage Enforcement Officer, All SEO Letters, Table of Contents to search for a specific letter or subject. Future *All SEO Letters* will be added to this repository.

If you have any questions or concerns, about this letter or any other issues, please contact us through the SEO Resource Account at RA-seotrng@pa.gov.

Sincerely,



Brian Schlauderaff

Environmental Group Manager
Planning Section
Municipal Facilities Division
Bureau of Clean Water
Department of Environmental Protection