



Pennsylvania Department of Environmental Protection

Rachel Carson State Office Building

P.O. Box 8774

Harrisburg, PA 17105-8774

August 6, 2007

**Bureau of Water Standards
and Facility Regulation**

717-787-8184

To All Sewage Enforcement Officers:

The purpose of this letter is to advise you of a number of personnel changes within the Division of Planning and Permits, Bureau of Water Standards and Facility Regulation, to address the permitting status of certain technologies being marketed in Pennsylvania, to update you on the availability of draft Act 537 program documents and to provide a status for currently underway experimental initiatives.

Personnel Changes: As some of you may know, there are a number of recent changes in the Central Office staff.

Mr. Dana Aunkst, P.E., the Division Chief of the Planning and Permits Division since spring of 2005, accepted the position of Bureau Director for our parent bureau, the Bureau of Water Standards and Facility Regulation.

I'm Ronald C. Furlan, P.E., Environmental Program Manager and I accepted the Division Chief's position vacated by Dana. I started with the Bureau on July 9 and I am presently getting reacquainted with the Act 537 program. Prior to this position, I served as the Environmental Program Manager of the Department's Southeast Regional Office, Waste Management Program and prior to that I was the Chief of the SERO Municipal Planning and Finance Section in the Water Quality Program.

Mr. Jay Africa, Chief of the Act 537 Management Section and a very familiar name in the program, retired on April 29. Mr. Kevin McLeary, P.E., Acting Chief, is currently filling Jay's vacated position.

Mr. Tom Franklin, Chief of the Facility Permits Section, whom many of you may know from being involved in the TVP program developed by him, also retired in April. Mr. Parimal Parikh, P.E., Acting Chief, is currently filling Tom's vacated position.

Mr. Lee McDonnell, Chief of the NPDES Permits Section took a position in the Southcentral Regional Office. Mr. John Wetherell, P.E., Acting Chief, is currently filling Lee's vacant position.

Un-permitted Technology: DEP staff recently fielded several inquiries about the use of a type of technology collectively referred to as an aerobic bio-inoculator or bio-generator. Apparently, these devices are being marketed to homeowners as a type of repair for malfunctioning onlot sewage systems that do not require obtaining a permit. These devices purport to repair a malfunction by changing the septic tank environment from anaerobic to aerobic, with some versions even including injection of a community of special bacteria to assist the process. In essence, this technology claims to change treatment addressed under Chapter 73, Section 73.31 into that addressed in Section 73.32. Trade names and vendors presently identified with this technology include White Knight, Pirana, Sludge-Hammer, Bio-Gator, ABG Generator and Aero-stream and we are certain this list is not all-inclusive. While two of the vendors (White Knight and Pirana) have approached DEP in the last several years about recognition as an alternate onlot sewage system



technology, neither has initiated the Technology Verification Program (TVP) process necessary for such recognition. Until such time this technology is classified by DEP under Section 73.71(b) as experimental or under 73.72(b) as alternate, it is not authorized for use in the Commonwealth and cannot be legally installed either with or without a permit. Following successful completion of the TVP and appropriate classification by DEP, a Local Agency issued permit would be required for installation.

Draft Regulation and Guidance Update: The draft "*Alternate Systems Guidance (ASG)*" and draft "*Site Suitability and Alternative Analysis Guidelines for New Land Development Proposing Onlot Sewage Disposal*" and the initial draft of new Chapter 72a are presently before the Sewage Advisory Committee (SAC) for comment.

Experimental Program Update:

Orengo AdvanTex AX20: Orengo Systems, Inc. is currently the only participant in the TVP. The Orengo AdvanTex AX20 unit is being field tested to evaluate both its advanced treatment and nitrogen removal capabilities. It is anticipated that sampling will be complete in Summer 2008 with an NSF report to follow. (Keep in mind that the Orengo AdvanTex AX20 unit is NSF Standard 40 certified and may currently be used as an aerobic treatment tank, in accordance with Chapter 73, Section 73.32.)

Micromound: In March 2007, letters and surveys were sent to 29 homeowners across the State whose drip irrigation micromound sewage treatment systems were classified as experimental by DEP's Central Office. The purpose of the mailing was to determine if the status of system installation and to remind homeowners of their responsibility to submit monthly sampling results to both DEP and the local agency. Based upon the response, it was determined that 17 micromounds have been installed thus far. Of those not installed, most respondents indicated that wet weather conditions had prevented installation. Follow-up letters will be sent to ensure that those components have been installed with the improvement in weather. Of the 17 micromounds that have been installed, nine are now submitting sampling results. Follow-up letters will be sent out to the others in an effort to obtain increased compliance with the monitoring requirements. The assistance of those SEOs who permitted these experimental micromound systems is needed to ensure that the required monthly sampling is being performed so that a determination may be made on the future use of drip micromound technology in Pennsylvania.

If you have any questions about any of the topics in this letter, please feel free to contact us at the telephone number listed above.

Sincerely,



Ronald C. Furlan, P.E.
Environmental Program Manager
Division of Planning and Permits