

**Sewage Advisory Committee  
Draft Minutes of the Meeting December 5, 2017**

**VOTING SEWAGE ADVISORY COMMITTEE (SAC) MEMBERS PRESENT**

Duane Mowery, Chairman, Pennsylvania Water Environment Association  
Chris Wood, Vice-Chairman, Pennsylvania Association of Sewage Enforcement Officers  
James Wheeler, Pennsylvania State Association of Township Supervisors  
Mark Mills, Pennsylvania Association of Professional Soil Scientists (PAPSS)  
Greg Marshall, Pennsylvania Onsite Wastewater Recycling Association  
Susan Myerov, Pennsylvania Environmental Council  
John Wagman, American Society of Civil Engineers  
Carl Cox, Pennsylvania State Association of Boroughs  
Jessica Shirley, Governor's Policy Office  
Joseph Valentine, Pennsylvania Septage Management Association  
David Kaufman, National Association of Water Companies  
Tom Quinn, alternate, County Departments of Health and Health Agencies  
Andrew Bockis, Pennsylvania Bar Association  
Wayne Schutz, Pennsylvania Municipal Authorities Association  
Jacqueline Peleschak, American Council of Engineering Companies of Pennsylvania (via conference call)  
Judith Tutino, United States Department of Agriculture Rural Development Mission (via conference call)  
Eileen Nelson, Pennsylvania Society of Professional Engineers (via conference call)  
Wayne Gross, alternate for John Peffer, Pennsylvania Vacation Land Developers Association (via conference call)

**MEMBERS OF THE PUBLIC PRESENT**

Tom Ashton, American Manufacturing Company, Inc.  
Meghan Andress, PreDoc, Inc.  
Thomas Cosgrove, PreDoc, Inc.  
Bruce Willman, alternate for Mark Mills, Pennsylvania Association of Professional Soil Scientists  
Adam Browning, alternate for Greg Marshall, Pennsylvania Onsite Wastewater Recycling Association  
Marie-Christine Belanger, Premier Tech  
Mike Kaub, Premier Tech  
Oran Biehl, Premier Tech

**DEPARTMENT OF ENVIRONMENTAL PROTECTION (DEP) STAFF PRESENT**

Lee McDonnell, Director, Bureau of Clean Water (BCW)  
Jay Patel, Environmental Program Manager, Division of Municipal Facilities (DMF), BCW

Brian Schlauderaff, Environmental Group Manager, Planning Section, DMF, BCW  
Janice Vollero, Water Program Specialist, Planning Section, DMF, BCW  
Annamaria Ether De Sanctis, Environmental Engineering Trainee, Planning Section, DMF, BCW  
Hayley Jeffords, Executive Policy Specialist, Policy Office  
Bill Cumings, Attorney, Bureau of Regulatory Counsel  
Sean Gimbel, Executive Assistant, Office of Water Resources Planning  
Nick Hong, Environmental Engineering Specialist, Southcentral Regional Office, Office of Field Operations

**CALL TO ORDER AND APPROVAL OF MINUTES**

The meeting was called to order by Chairman Duane Mowery at 10:30 AM in the Susquehanna Room of the DEP Southcentral Regional Office Building. A quorum was present.

Chairman Mowery clarified the acronym MFD in the Act 26 Discussion section on page 3 in the minutes from the October 4, 2017 meeting. MFD stands for Municipal Facilities Division.

**Motion:** Carl Cox made a motion to adopt the October 4, 2017, meeting minutes. Andrew Bockis seconded the motion, which was unanimously approved by the Committee.

**SAC RECOMMENDATION FOR THE STATE BOARD FOR THE CERTIFICATION OF SEWAGE ENFORCEMENT OFFICERS**

Samuel D’Alessandro is a SAC member who is on the Sewage Enforcement Officers (SEO) Certification Board. His Board certification is expiring in March. He is willing to serve for another term (4 years). Chairman Mowery asked the Committee if anyone else was interested in serving on the SEO Certification Board. There was no interest.

**Motion:** John Wagman made a motion to reappoint Samuel D’Alessandro as SAC’s recommendation to the SEO Certification Board. Chris Wood seconded the motion, which was unanimously approved by the Committee.

**SAC ACT 26 WORKGROUP RECOMMENDATIONS ON DEP’S IMPLEMENTATION STRATEGY**

Act 26, enacted July 20, 2017, amended Act 537. Three (3) SAC workgroup meetings were held through the month of November to discuss DEP’s implementation strategy of Act 26. SAC must now develop comments on that strategy and submit them to the DEP Secretary. DEP will review those comments and create a policy to implement Act 26. That policy will be published for public comment and a final policy will be in place by March 18, 2018. Chairman Mowery reminded everyone to gather the handouts at the door: treatment chart, DEP’s recommended advanced pretreatment component summary, the voting issues and the agenda. Chairman Mowery turned the meeting over to John Wagman, Chair of the workgroup, to introduce the workgroup issues to be voted on by the Committee.

1. **Voting Item:** The workgroup believes that 10/10 mg/l Carbonaceous Biochemical Oxygen Demand (CBOD5)/ Total Suspended Solids (TSS) is an appropriate level of treatment in shallow limiting zones (LZ).

**Discussion** [*Editor's note: In order to capture the discussion regarding Act 26 fully, each separate paragraph represents a paraphrasing of one individual's comments*]

John Wagman explained the following: the workgroup was undecided regarding its support for the proposed DEP requirement of fecal coliform (FC) reduction for systems installed on shallow limiting zone (less than 20") sites and decided that further discussion at the full SAC meeting was necessary.

DEP's proposal for advanced treatment was outlined in the treatment chart given to SAC members at the meeting and was as follows:

- For soil groups II-IV, LZ 12"-20" to seasonal high-water table (SHWT) or greater than or equal to 16" to rock = 10 mg/l CBOD; 10 mg/l TSS and less than 1000 col/100 mls FC.
- For soil group I, CBOD and TSS would be the same as above, except FC would have a limit of 200 col/100 mls.

Joe Valentine made the following comments: He has spoken to some of the authors of the literature that DEP cited. The FC numbers are all over the place. Mr. Valentine raised the concern of sampling for FC, because high numbers are possible after a rain event due to the flushing process; most of our seasonal wetness is not a true water table but a seasonally slow permeability in the soils, unrelated to a true water table; and if you relate sand to the soils, we are having a better impact on protecting the environment [referencing the Del Val research presented to SAC members; at Del Val, an at-grade system with septic tank effluent was installed in deep, well-drained soil, 72" LZ and samples showed higher FC at 2', 3' and 4']. Mr. Valentine was concerned about the following:

- It will be hard to get consistent FC numbers due to rain events and the timing of the sampling
- High FC will give appearance that the technology is at fault
- Some of the better, deeper soils might see greater flush events due to these soils having macropores, allowing for better movement of the flush event
- Most of the technologies, especially with a final polishing filter, like a sand mound, will get attenuation of FC, but it is the flushing event that is a problem
- Sampling protocol could be structured to avoid flush events, but it would be difficult given that the policy requires random sampling of 10 systems.

Mr. Valentine was not convinced that having a standard for FC is necessary.

Chairman Mowery expressed the following concerns:

- There may not be any technologies capable of meeting the standard without some significant cost or additional disinfection

- The Committee should be aware that this issue of FC reduction was also dealt with in 2011, when DEP and SAC discussed this issue
  - DEP initially required ultraviolet (UV) disinfection on shallow LZs; then based on the Del Val research, they reconsidered this requirement and retracted the requirement for UV disinfection in an October 2011 memo. Most of the literature being looked at now was available at that time.

Jay Patel then explained the following:

- There are pathogens in sewage and FC is used as an indicator for these pathogens
- DEP started this process by looking at states that had standards for advanced treatment components. DEP found that a number of states had a standard of 1000 col/100 mls, and DEP looked at the literature reviews those states looked at to come to their decision
- DEP has reviewed data on column studies and field studies, and they are not all the same
  - With a highly treated effluent, you don't get that organic layer that prevents the pathogens from getting out in the environment. How much soil is enough to remove pathogens is unclear, but DEP has got to be protective. No one can definitively say that in every case, 12" of soil will do enough to be protective. That is the biggest reason that led DEP to an FC standard. DEP chose a number as a standard. That number is blind to technology; it is a matter of showing one can meet it.

Brian Schlauderaff further stated:

- The difference between 2011 and now, is new land development. DEP had been basing their decisions on repairs, where you are trying to make the situation better
- DEP changed from this approach and started from scratch, reviewing a large amount of research
- DEP looked at:
  - 51 different papers, 47% were journal papers and field studies;
  - 23 papers were cited and summarized.
    - These 23 included 13 field studies, 4 column/pilot lab studies and others were literature reviews done by other states.
- When there are a lot of shallow LZ systems going into a new subdivision and insufficient well standards, DEP has to be protective
- Viruses are a serious concern also; they move through soil easier than bacteria; they stick around and build up
- Intermittent sand filters are a good choice for FC reduction but if you must get to 200 col/100 mls., you may need something else
- DEP's standards would apply at end of the pipe before the absorption area
- It would be difficult to test some technologies at end of pipe; like drip micromounds and Elgen systems. DEP is unsure of how to deal with these. This standard would apply to repairs also.

James Wheeler asked what additional costs this would bring and will it be affordable, because depending on whether one uses a sand filter or ultraviolet disinfection, costs can be in-excess of \$1000.

DEP said they believe a FC standard will be protective of property values in the long-term.

Joe Valentine stated:

- People frequently refer to “seasonably high-water table” when they are really talking about a perched water table, and we see redox features due to this slow permeability; this is a conservative approach.
- He believes DEP is doubling down if they enact a FC limit, and this might be over-effective.

DEP responded that if a developer can provide evidence that shows there is no impact, they would look at that evidence.

Greg Marshall suggested that the soil scientists make the determination in the field if it is a true water table needing FC reduction or if not a true water table, because if it is not a true water table, then no FC reduction is needed.

Mark Mills and Joe Valentine, soil scientists, said they felt qualified to make that determination in the field.

Mark Mills suggested DEP should not make a distinction between repairs and new land development. Mark further stated that:

- Act 26 didn't manifest itself out of a need for soil solutions for repairs--it was created to make use out of lots that couldn't be developed
- Individual residential spray irrigation systems (IRSIS) disinfection fails a lot and no one conducts long-term operation and maintenance (O&M); owners never fix it
- The Act was set up to approve alternates just like conventional systems
- Proposed standards that are so extreme compared to conventional systems, that no one will use alternates, because alternate systems are \$20,000 to \$30,000 and these proposed standards will make them cost even more.

Wayne Schutz expressed that if DEP stays with a FC standard, DEP should spend extra time on developing sampling protocols.

There was wide concern from various SAC members that, if a system failed the annual audit, it could be the home owner's lack of O&M and not the technology's fault.

DEP agreed this is a possibility and lack of O&M by a homeowner, if applicable, will be considered at the time of any failure.

Andrew Bockis asked if DEP's position is based on whether there are private water wells or public water supplies serving the projects. DEP answered no.

**Vote:** *Do you support the Department's proposed limitations on fecal levels for these shallow LZ systems?* 5 in support of; 12 not in support of.

**Vote:** *Do you support the workgroup's belief that a 10/10 limit for CBOD and TSS is an appropriate level of treatment in shallow LZs?* Vote was unanimous in support of.

2. **Voting Item:** The workgroup supports DEP's intention to require O&M on all alternate systems and would require corroboration with the manufacturer's recommendations.

### **Discussion**

Chairman Mowery requested a slight modification to the language to include "as necessary" to the end of the statement, because DEP mentioned during a workgroup meeting that if you had a system like that of a sand mound, the O&M would be similar. There are non-proprietary technologies, like the flout, that can be used on shallow LZs. Mr. Mowery also explained he felt DEP's position is that O&M should be required on all alternate technologies sited on both shallow LZs or greater than 20" LZs. Mr. Mowery further explained that DEP also philosophically agrees that O&M is a requirement for conventional systems sited on greater than 20", but that DEP doesn't believe it is appropriate to enforce that O&M on conventional technologies at this moment.

Jay Patel agreed and elaborated that DEP is focusing only on what Act 26 is requiring of DEP. Fundamentally, DEP agrees that all onlot disposal systems require O&M.

Chairman Mowery wanted to make it clear that if the Committee states they agree that alternate systems need O&M, but remain silent concerning O&M for conventional systems, that this might be misconstrued in the future that SAC supports O&M on alternates but not on conventional.

Chris Wood stated that O&M should be incorporated even though it's not in Act 26, and there is no mechanism for the local agency to enforce it. The manufacturers want it.

Greg Marshall supports using "as necessary". Mr. Marshall further stated:

- That the flout requires a once a year inspection at a price of \$200 to \$300 for that inspection. That O&M is an undue burden on the home owner, and based on this O&M requirement, he does not use flouts.
- Until the SEOs are given the tools to enforce O&M and DEP forces the SEOs to cite the home owners, how can we enforce the O&M requirement?
  - The manufacturers cannot take the home owners to civil court.

James Wheeler stated that operating permits would solve this issue.

**Vote:** *Do you support DEP's intention to require O&M on all alternate systems and would require corroboration with the manufacturer's recommendations, as necessary?*  
15 in support of; 1 not in support of; 1 abstained.

3. **Voting Item:** The workgroup supports allowing those alternate technologies with NSF 40 certification and meeting the 10/10 standard and incorporating the appropriate fecal reduction measures (pending the outcome of item #1) to move directly to the performance verification and bypass the field testing. Non-NSF 40 approved systems would require field testing.

### Discussion

Chairman Mowery explained meeting the NSF 40 standard means the technology can meet a treatment level of 25 mg/l CBOD and 30 mg/l TSS. Chairman Mowery further stated:

- Testing is done at a third-party facility
- DEP is proposing a three-step process: NSF testing, field testing of systems within PA or another state with a similar climate to prove that the technologies meet the standards in real world situations, and an annual audit process
- The workgroup supports that if the technology can meet advanced treatment standards (10/10) during the NSF testing, the manufacturer should not need to field test the technology. Instead, the manufacturer could rather be given an unlimited authorization to install these systems and it would be during the annual performance audit process where it would be determined if the systems would perform in the field. Since SAC already decided to not support fecal reduction, a change to the language of this item was suggested by Chairman Mowery – use “advanced treatment standards.”

James Wheeler questioned if NSF 40 was a performance certification and if so, isn't that enough?

Brian Schlauderaff explained that it is a performance certification for the whole system in a controlled environment; NSF certification is the first step in the process.

Chairman Mowery brought up the point that the way item #3 reads, if the technology meets NSF 40 and the advanced treatment standard, the manufacturer in theory could install an unlimited number of systems without field testing until the audit process validates their performance. Mr. Mowery feels the Committee needs to be aware of this.

James Wheeler asked if there is a concern with the number of systems allowed to be installed before the performance audit?

Jay Patel said that is something DEP needs to consider.

Greg Marshall stated that the Department would be looking at actual field data for the systems on the list.

Jay Patel said that DEP is not sure what they will get from the everyone, but DEP assumes they will get field data.

Chairman Mowery brought up that if this is going to apply to new technologies, shouldn't it apply to the existing technologies? He also asked if an existing technology has NSF 40 certification shouldn't they be able to go directly to the audit process without submitting field testing?

Lee McDonnell stated that if the existing technology has field data, DEP wants to see the field data in addition to the NSF 40 testing. He further stated that it would be a bit ingenious to have field data and not turn it in.

Brian Schlauderaff stated that DEP's original position was that you would need NSF 40 certification and need enough data points from the field; 12 sites with once/month testing over a period-of-time and meet standards with a 90% confidence interval. DEP modified this position due to what DEP thought SAC wanted, and this position was for existing systems; not a new technology coming in.

Chairman Mowery asked if item #3 is really a voting item if SAC is accepting what the Department originally proposed? Chairman Mowery asked the vendors who were at the workgroup meetings if they said they would like to eliminate the field verification and if so, did they hear the Department agree to that?

Marie-Christine Belanger, from Premier Tech, stated that that was exactly what was said at the workgroup meetings.

The Jet, Inc. representative suggested during one (1) of the workgroup meetings that if meet NSF 40 and 10/10 standard and fecals, then one can go directly to the annual audit process.

Brian Schlauderaff agreed that is what DEP heard also.

Chairman Mowery than said that is exactly how item #3 is written.

John Wagman suggested this new language: The workgroup supports allowing those alternate technologies with NSF 40 certification and meeting DEP's advanced treatment standards and that provides enough field testing data to meet DEP's requirements or to their satisfaction, to move directly to the performance verification and bypass field testing. Mr. Wagman is concerned with how rigid the field testing protocol is. Mr. Wagman suggests using satisfaction over requirements.

A discussion ensued whether this language change was any different then what was originally written, and could SAC modify the language of original statements. In addition, there was concern over professional judgement calls to be made by DEP and the subjectivity of the person making that call.



Brian Schlauderaff clarified that DEP already has a minimum number for the amount of field data DEP wants and DEP will stick to that without another recommendation. DEP will use their best professional judgement in what will be accepted for the data; it will come down to if the data is verifiable.

**Vote:** *The workgroup supports allowing those alternate technologies with NSF 40 certification and meeting DEP's advanced treatment standards to move directly to the performance verification and bypass the field testing.* 8 in support of; 6 not in support of.

Chairman Mowery asked the Committee if they wanted to break for lunch. No one desired to.

4. **Voting Item:** The workgroup supports continuing to follow Chapter 73 requirements for isolation distances, which includes additional 2' to the tubing for drip systems.

### **Discussion**

Greg Marshall explained that this is an important item to consider, because DEP asked the workgroup to comment on the standards, including siting, and siting includes isolation distance. Mr. Marshall further explained:

- That the workgroup did not think it necessary to increase the horizontal isolation distance, but he did
- He had concerns with shallow LZ systems and distance to property lines, especially downslope, because the downslope berm can come right to the property line and the neighbor can then build a wall or cut a drive right at that property line
  - Effluent on shallow LZs moves horizontally, and he has seen a lot of “bleed out” in these situations
  - With new land development, we can increase the horizontal isolation distance.

Chris Wood validated Mr. Marshall's concerns, though Mr. Wood hasn't seen that issue with alternate systems, only with elevated sand mounds.

Brian Schlauderaff stated that he wrote the language down from the workgroup meetings, and Mr. Marshall had stated he wanted the soil scientists to make the downslope isolation distance call.

Jay Patel agreed. Mr. Patel said DEP can include some requirement in the listings; language that talks about looking downslope and ensuring it is not leaving the property – that the area is protected; have the setback from the infiltrative surface, not the toe of the berm; that setback still might be 10', but it would give the soil scientist the leeway to make that call.

Joe Valentine read from the listings and summarized that the person doing the site assessment needs to do more than identify the LZ is “x” and the soils are “y”; they need

to address other site conditions that are of concern. That requirement is already in the listings.

Greg Marshall explained that is easy to do for existing houses but not for new land development.

A general discussion ensued how to determine this downslope isolation distance and memorialize it for new land development proposals.

Joe Valentine suggested adding the following language to the end of item #4: “Any additional separation deemed necessary by the soil scientist needs to be addressed in their report.”

**Vote:** *The workgroup supports continuing to follow Chapter 73 requirements for isolation distances, which includes additional 2’ to the tubing for drip systems. Any additional separation deemed necessary by the soil scientist needs to be addressed in their report.* 14 in support of; 1 not in support of; 1 abstained

5. **Voting Item:** The workgroup recommends that, for new land development planning, keeping the 10” as the minimum depth to the high-water table and 16” to rock as the minimum criteria for shallow LZs.

### **Discussion**

Chairman Mowery explained that the Department recommends that the minimum depth to the LZ be increased to 12”.

Chris Wood stated he didn’t have an opinion as to whether 10” or 12” is correct, but mentioned that in his municipality, there are at least 10 systems sited on 10” and probably at least another 100 properties are in this position that have not been permitted. Mr. Wood stated that if the 10” is changed to 12” in the future, these sites would be unusable. Mr. Wood then asked how the Department can justify using 12” on new lots, using 10” on existing lots and using 8” on repairs?

Greg Marshall pointed out that the matrix states repairs changed from 10” to 12” and it is difficult on repair sites to find 12”.

Brian Schlauderaff clarified that it is 8” to 12” for repairs.

Greg Marshall brought up that you would need advanced treatment which would add another \$2000.

Mark Mills commended the Department on listening to SAC and made the Committee aware that this was the third chart that DEP amended. However, Mr. Mills stated that from PAPSS perspective, the 10” falls back to drainage classifications; 10” is tied into the science of soil science. He also said that the cutoff for hydric soils is 8”, and we will

run into problems with using 8". Mr. Mills stated if we want clean effluent, it doesn't matter if it is new land development or a repair; we shouldn't have two (2) sets of standards, because two (2) sets will not be helpful to the SEOs. PAPSS is in favor of 10", not 12" or 8" and not two (2) sets of LZs for new land development and repairs.

Greg Marshall stated he likes 8" for repairs.

**Vote:** *The workgroup recommends that, for new land development planning, keeping the 10" as the minimum depth to the high-water table and 16" to rock as the minimum criteria for shallow LZs. 14 in support of; 2 not in support of.*

6. **Voting Item:** The workgroup supports incorporating timed dosing into all shallow LZ systems if a pump is used.

No comments or discussions occurred on item #6.

**Vote:** *The workgroup supports incorporating timed dosing into all shallow LZ systems if a pump is used. Vote was unanimous in support of.*

7. **Voting Item:** The workgroup supports a requirement to incorporate a fail-safe mechanism to prevent untreated or partially untreated effluent from entering the absorption area.

### **Discussion**

Chairman Mowery stated that at the March 2016 SAC meeting, the Committee discussed that up until the time the Norweco system was approved, every technology had a physical barrier between the septic tank and the absorption area like a media filter, disk filter, etc. Mr. Mowery stated that if we do not require a barrier between the septic tank and the absorption area, the Committee is sanctioning a departure from their past philosophy. And if the Committee does choose to go that route, Mr. Mowery wants the Committee to be aware of this departure and consciously sanctions that approach.

James Wheeler asked for clarification as to what is causing this requirement.

Tom Ashton, American Manufacturing Company, Inc., stated that lots of these systems are pass-through systems with aerators, and if the aerator shuts down, the pump prevents the effluent from entering the absorption area.

Chairman Mowery added that it is not uncommon for a home owner to shut off the aerator to save electricity; very important to have a barrier.

John Wagman stated that really it is about the soil not the absorption area, because sand is a barrier.

Chris Wood explained that there is a particular brand of aerobic tank used in NE PA that when the power goes out, the effluent runs out of the septic tank; unlike another type of aerobic tank with two (2) pumps. He then said if the first pump fails or the power goes out, the effluent backs up into the house and the people turn the power on right away.

James Wheeler asked if this fail-safe would apply to everything?

Chairman Mowery answered yes. There is either sand, peat or cocoa filter, geotextile filter or disk filter in everything but one (1) system.

John Wagman stated that this is really meant for aeration units.

James Wheeler stated if that is the case, item #7 should say aerators, and not add something extra to systems that don't need it.

Chairman Mowery reminded everyone that it could apply to a future technology that may not have an aerator.

Jay Patel stated that it should be in the Department's thought process when evaluating systems. DEP should consider what could get screwed up and how solids could be prevented from getting out of the system.

Chairman Mowery stated he would rather have "physical barrier", but he wants the group on board. If the Committee is moving beyond a physical barrier, then the Committee needs to recognize this.

James Wheeler did not think fail-safe includes physical barrier.

***Vote:*** *The workgroup supports a requirement to incorporate a fail-safe mechanism or physical barrier to prevent untreated or partially untreated effluent from entering the absorption area. Vote was unanimous in support of.*

Chairman Mowery stated that was the end of the list of voting items.

Chris Wood stated that John Wagman did an excellent job of condensing everything down.

## **PUBLIC COMMENT**

Adam Browning, alternate for POWRA on SAC, stated a concern with time dosing. Currently the dose is 5 times the internal volume of the delivery lines and laterals in the system. Time dosing takes so much volume of water that by the end of the day, it runs dry, and therefore it eliminates the idea of time dosing. Mr. Browning suggested we limit the dose to 5 times the internal volume of the laterals and 1 time the internal volume of the delivery line.

## **NEW BUSINESS**

Greg Marshall was asked to remind DEP to clean up the definition of soil scientist. Mr. Marshall also brought up that the .25-gallon toilet required in the black water holding tanks and greywater onlot systems is very hard to get, doesn't work well and is very expensive. Mr. Marshall has reached out to South Central Regional Office concerning this issue.

More discussion ensued about the minimum LZ depths.

Chairman Mowery gave a summary going forward: he will draft a letter to DEP from SAC; DEP will develop draft policy which will go out for public comment in January for 30 days; DEP will receive comments and develop final policy by March 18.

DEP stated that January 13<sup>th</sup> is target date for publication in Pa. Bulletin and requested that all comments should go through eComment online. DEP also said that anything sent outside of the public comment period is outside of the public record; comments can be sent in outside of the public comment period and they may be considered, but again, they won't be part of the public record. The comment and response document will come out the same time as the final policy. Policy and guidance are different in their hierarchy, and both are statements on how DEP will generally implement an act or regulations, subject to deviation as necessary.

### **NEXT MEETING**

The next meeting of the Sewage Advisory Committee is planned for Tuesday, April 24, 2018, in the South Central Regional Office Building, Susquehanna Room.

### **ADJOURN**

**Motion:** Carl Cox moved to adjourn the meeting. Wayne Schutz seconded the motion which was unanimously approved by SAC. The December 5, 2017, SAC meeting was adjourned at 1:26 PM.