



# **Document Revision: Alternative On-lot Sewage Pretreatment Technology Verification Policy (TVP)**

**PADEP Doc. No. 385-2208-003**

17 June 2020

# Revisions to Draft

- Modified Tyler Table removed due to confusion.
- Depth to Seasonal High Water Table:
  - 12” minimum depth for NLD changed back to 10”
  - 8” minimum depth for repairs changed back to 10”

# Performance Audit, Revisions to Draft

- Annual performance audit was changed to performance audit.
- Performance audit is now voluntary.
- Audited systems will need to be operated continuously for at least 60 days prior to date of audit.
- Removed compliance language and replaced with Action Levels.

# Performance Audit, Revisions to Draft (cont.)

- Added a 5-year performance audit cycle review by DEP.
- Added annual performance monitoring of all installed alternate components and systems.
- Performance monitoring requirements will be listed in individual OAT Technical Guidance Documents.

# Let's Walk Through The Process

- Step One – Administrative Review
- Step Two – Application Technical Review
  - Evaluate 3<sup>rd</sup> Party Data, Field Test Data
- Step Three – Approval
  - Determine performance monitoring
  - Consult SAC
  - Public Notice and C&R
  - Final Approval

# Performance Monitoring

- For those manufacturers who do not wish to become conventional.
- Annual sampling by a qualified service provider for all newly installed systems in PA.
- Option - May be able to use the previously collected performance monitoring data in the performance audit process.

# Performance Audit

- For those manufacturers who wish to become conventional technology.
- Annual inspection and sampling by an approved 3<sup>rd</sup> party of up to 10 randomly chosen installed systems for the 1<sup>st</sup> five years.
- Reviewed by the Department every 5 years.
- Once scientifically determined that the technology performs as classified, the Department will classify the technology as conventional. (Caveat)

# Technology Review Process

- Complete the Initial Data Verification form.
  - Reviewed by the Department (Predetermination)
- Complete the Application for Classification as an Alternate.
  - Administrative review by the Department (Step 1)
- Complete Step 2 (technical review) and Step 3 (approval).
- Choose Performance monitoring or Performance Audit.



# Timeline for submission of Proprietary Alternate Information

- 21 calendar days from receipt of request to submission of Initial Data Verification form to DEP.
- 45 calendar days from notice of determination of eligibility to proceed with the Application for Alternate Classification (Step 1) to submission of Application to DEP
- Extension of timeframes per discussion with DEP
- Existing OAT Classifications may be rescinded if timelines are not followed.

# Current Classified Non-proprietary Technology Process

- The Department will review all currently classified non-proprietary technologies and either rescind classification or update and publish as a TGD.
- The Department will review all new beneficial non-proprietary technologies and publish them as a TGD.

# SAC's Involvement?

- Would SAC like to form a workgroup to review classification recommendations or would they like DEP to present to the entire committee?
- In order to make this process as timely as possible, additional SAC meetings will need to be scheduled.

# Questions?



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