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Pennsylvania DEP

To whom it may concern:

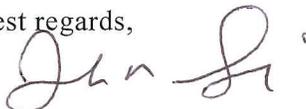
I would like to respectfully provide comments on the Draft Technical Guidance Onlot Wastewater Technology Verification Protocol (TVP). (385-2208-003)

This policy will require some onlot sewage system manufacturers to go through the TVP again, even though these manufacturers have already complied with the TVP as previously required. This is the case with Orenco Systems, Inc. Orenco worked with NSF on this TVP, submitted a detailed QAPP, and met all the requirements in the TVP. Requiring a manufacturer to re-verify technology performance, after expending considerable financial resources, and time, to comply with the previous TVP requirements puts an unfair burden on that manufacturer.

Manufacturers should be able to supply additional third-party information on TN, BOD, and TSS removal treatment technologies that have already demonstrated that they can meet the requirements of the PA onsite regulations.

The main difference between the previous and current TVP is the requirements for FC reduction. Several manufacturers have tested treatment units during NSF Standard 40 testing, for FC reduction to meet the State of Washington requirements. Manufacturers should be able to submit this test data to the PA DEP to meet the requirements of 385-2208-003.

Best regards,



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