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**IDEQ Onsite Rule Comments**

Peter,

Thank you for the opportunity to provide comments on the upcoming changes to the Idaho rules. After reviewing the proposed changes, below are a few comments:

**1. Septic Tanks Design and Construction Standards**

- a. Section 02. Design: A professional engineer licensed by the state of Idaho must submit all septic tank designs to the Department for approval. If any design submitted for approval does not meet all requirements in Section 007, the engineer must demonstrate that any deviation is determined by sound engineering practice and meets the intent of the rules.
  - i. Does this also apply to tanks used in STEP applications?
  - ii. It would be useful to have a section that outlines a process to use tanks in STEP applications in these standards. Orenco has helped multiple jurisdictions write regulations relating to STEP applications and would be open to being a resource if needed.

**2. Standard LSAS Design Specifications**

- a. Section j: An in-line effluent filter between an extended treatment system or lagoon system and the large soil absorption area must be installed.
  - i. We suggest removing the term "in-line filter" as this references a very specific type of filter, we suggest using the term "effluent filter" and perhaps define the properties of said filter.

Thank you for the opportunity to provide comments.

Best,  
Mark Schaefer