

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Environmental Health Section

April 13, 2016

Wayne Burritt, President  
Waste Engineering Inc.  
78 Cross Highway  
Redding Center, CT 06875

### RE: Rating Revision Request for GreenLeach Filter Non-Filter Fabric Leaching Systems

Dear Mr. Burritt:

This Department reviewed your un-dated letter that was received on February 29, 2016 requesting revisions to the effective leaching area (ELA) ratings for GreenLeach Filter non-filter fabric (GLF-NF) proprietary leaching system products. Leaching system ELA ratings are dependent upon the amount and type of leaching system interface, and interface factors that are cited in Section VIII H of the Department's *Technical Standards for Subsurface Sewage Disposal Systems* (Technical Standards). The interface factor is the same for filter fabric, cardboard, and cardboard/filter fabric interfaces. Your submission requested that the cardboard interface factor used to rate the GLF-NF products be increased to the interface factor for stone interfaces based on your contention that the temporary cardboard form used in the products degrades after the leaching system is in use for a period of time.

Your submission included a February 23, 2016 report by R.W. Northrop & Sons Engineering prepared by Samuel S. Northrop, P.E., which evaluated three existing GreenLeach Filter (GLF) leaching systems that have cardboard/filter fabric interfaces. The GLF leaching systems ranged in age from approximately 1.5 to 3 years old. GLF-NF leaching systems were not evaluated as part of the assessment. Mr. Northrop apparently identified "barely trace remnants" of cardboard, and concluded that it would not constitute a hydraulic limitation.

Your request for an ELA rating revision for the GLF-NF leaching products cannot be granted at this time, and any future rating adjustment could only be made in conjunction with revisions to the interface factors published in Technical Standards Section VIII H. It should be noted that this section includes language about future crediting limitations for certain leaching system interfaces, and restrictions on credits for proprietary leaching systems approved after January 1, 2015. Any proposed leaching system ELA rating revisions will be vetted with this Department's Code Advisory Committee (CAC), and there will be an opportunity for interested parties to participate in and comment on proposed changes.



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Future discussions with our CAC and interested parties on potential changes to the Technical Standards interface factors would consider third party/independent test data that evaluates short and long term effluent acceptance rates of a leaching system interface, and historically this Department has utilized the conventional stone trench interface as a benchmark. The scope of Mr. Northrop's assessment concerned visual observations to determine if cardboard was still present on the GLF filter fabric on three systems that were in use for several years. No assessments were made on GLF-NF systems, and no assessment was made on newly installed systems. Your request for the GLF-NF cardboard interface to be considered the same as a stone interface was not supported by third party/independent test data comparing effluent acceptance rates of stone interfaces and cardboard interfaces. If you have any questions about ELA ratings or the Technical Standards revision process, please contact myself or Matt Pawlik at (860) 509-7296.

Sincerely,



Robert W. Scully, P.E.  
Supervising Sanitary Engineer  
Environmental Engineering Program

C: Code Advisory Committee

P/RWS/GreenLeach Revision Rating Request