

The MOA Onsite Section has the following questions with regards to the proposed revisions to 18 AAC Chapter 72 Wastewater Treatment and Disposal:

- 1) Reference 18 AAC 72.015 (pg 5) – We understand not allowing new log cribs and systems utilizing wood components in contact with wastewater, but why can't existing systems remain in use if an engineer determines they are still structurally sound?
- 2) Reference 18 AAC 72.100(a)(1) (pg 13) – Is there a reason that the separation distance between private wells and community sewer lines/sewer mains was increased to 100 ft, besides for consistency with separation to manholes/cleanouts?
- 3) Reference 18 AAC 72.100(a)(1) (pg 13) – By definition, a sewer line carries nondomestic wastewater, which includes stormwater runoff. What is the ADEC's intent as far as requiring 100 ft separation to stormwater runoff? Will this include road ditches?
- 4) Reference 18 AAC 72.520(f) (pg 56) – What is the reason behind the 10 ft separation between a septic tank and an absorption field (MOA requires a 5 ft separation)?
- 5) Reference 18 AAC 72.620 (pgs 78 & 79) – Do alternative wastewater systems not have required separations to items specified under 18 AAC 72.520(c thru f) for conventional wastewater systems?
- 6) Reference 18 AAC 72.530(d)(1&2) (pgs 58 & 59) and 18 AAC 72.630(d)(1&2) (pg 81) – What are the reasons for limiting the maximum slope of piping? Would these reasons be of concern on smaller, residential systems?
- 7) Reference 18 AAC 72.530(g)(3)(A) (pg 65) – The premanufactured pumping chambers utilized in the MOA have significantly less than 350 gallons capacity. Why is 350 gallons the minimum required volume for a pumping chamber that is separate from the tank?
- 8) Reference 18 AAC 72.530(f)(1)(A thru D) (pgs 61 & 62)
  - a. Does the minimum depth of distribution medium include the material that extends above the distribution pipe (so the depth of material starting below the filter fabric) or only the material below the distribution pipe?
  - b. If it only includes the material below the distribution pipe, why is the minimum required distribution medium 12-inches for beds and shallow trenches? Has it been shown that 6-inches is not sufficient?
  - c. Why can't the bottom of a seepage pit extend more than 2 ft below the bottom of the tank, as long as the minimum separation to groundwater and impermeable soil has been provided?