

# Clayton Spitler

I've attached a PDF with my initial comments.

- I request that the comment period be extended (60 days as others have requested, or more) to allow wastewater industry stakeholders ample time to review the proposed significant revisions to 18 AAC 72.
- 72.007: The concept of a technical review committee is a good one, as wastewater industry stakeholders will all bring something useful and different to the table for discussion. It is, in my opinion, such a good idea that a technical review committee should be considered now to review the currently proposed revisions to 18 AAC 72. Doing so would likely help to generate regulations that accomplish the purpose while hopefully significantly decreasing inefficiency, confusion, and review timelines later.
- 72.220 (f): If ADEC is going to enact a 45 day deadline for applicants to respond to ADEC review comments, it would be fair to add "If ADEC does not respond to an applicant's initial submittal or subsequent submittals or correspondence within 45 days, the ADEC review fee will be refunded.". This comment also applies to any other section of the proposed regulation revisions indicating the 45 day deadline.
- 72.270 (b) (1): If ADEC is going to specify allowable sewer line slopes for standard pipe diameters as proposed in 72.530 (d) (1), then calculations of mean conduit velocity are not necessary for the same standard pipe diameters. Perhaps this could be revised by prefacing with the following language: "For pipe diameters other than those listed in Table 2 in 72.530, ....".
- 72.511 (d) (3): Recommend adding "(and associated dual-classifications)" prior to "under".
- 72.511 (d) (4) (B): Recommend adding "similar and properly installed" prior to "conventional".
- 72.515 (b) (1) (F): Recommend adding "if applicable" after "conduit velocity". See comment for 72.270 (b) (1).
- 72.520 (c): Recommend revising this section to essentially copy Municipality of Anchorage (MOA) Wastewater Disposal Code 15.65.210 (B) (1) (d and e).
- 72.520 (f): Recommend replacing "10 feet" with "5 feet", to match 2021 Uniform Plumbing Code (UPC) Appendix H Table H 101.9.
- 72.530 e (3) (B): In my opinion, it is not necessary to require manhole access openings extended to grade on ALL septic tanks greater than 2,000-gal in volume. Evaluating this requirement on a case-by-case basis, dependent on facility/waste type, makes more sense.
- 72.530 (f) (2) (A): Recommend revising this section to essentially copy MOA Wastewater Disposal Code 15.65.210 (B) (4).
- 72.550 (c) (3): It is not necessary to require engineers to provide photographs. Engineers are required to seal the DOC, and record drawing(s) if applicable.
- 72.630 (d) (1): As proposed, this language appears to be in partial conflict with Table 2 in 72.530 (d) (1), as it indicates an allowable pipe slope of 2 to 20% for all pipe diameters greater than or equal to 4".
- 72.630 (e) (1): Recommend adding "or equivalent third party accreditation organization" after "NSF/ANSI 40".
- 72.650 (a) (2): Remove "installation and". Engineers are not responsible for the installation, the same as installers are not responsible for design, and in this case, documentation.

- 72.650 (b) (2): This language is currently inaccurate. Engineers do not install or modify systems. They are the consulting/design part of the team, and installers do the installing and modifying.
- 72.650 (c) (4): It is not necessary to require an engineer to submit photos of construction, especially since the engineer is also required to prepare and seal the DOC and/or record drawing(s).