

**Environmental Liaison Group Meeting  
11-06-09 Bridgeport WV**

Present: Brad Cochran, Tim Miller, Gail Sowards, Susan Plum, Mike Trantham, Denny Taketa, Don Thimsen, Ryan Harbison.

The meeting was called to order at 10:40 AM by Brad.

Brad asked Gail to take the minutes in Fred Barley's absence. There have been membership changes and vacancies. Kay Shamblin retired, and Amy Atkins is temporarily serving in her position. Jennifer Walls married Bill Nestor, and has resigned from Cabell County so the nurse liaison position is vacant. Clarence Christian retired and Ryan Harbison replaced Clarence as the District Sanitarian representative, and Denny Taketa from Mineral County has replaced Arleta Lancaster. Hopefully all vacant positions will be filled by the next meeting in February.

Minutes from the last meeting have been posted and are on the website for review. Minutes were approved and accepted from last meeting.

**Old Business**

Rick Hertges has produced a document for review concerning Grey water sewage systems (attached below). Group discussion concerning the need for a policy and it was decided the policy should also be reviewed by the Sewage Advisory Committee in case WV DEP has different guidelines or recommendations.

A-4 is still not 100 percent complete. This policy relates back to the old WW-8 Local Health/EED delegation of duties. Hope to have completed by the next meeting.

In Fred Barley's absence Ryan Harbison gave an update on the Manufactured Home Communities draft rule (Old MHP). The committee is at a stand still concerning the addition of setbacks and referencing the fire marshal rules. Brad said he is not ready to move this rule to the legislature at this time. PLEASE respond to the Fred with your comments. The MHP committee is **not** receiving comments from Sanitarians. Brad mentioned the proposed rule is on the INTRANET site and **WE NEED INPUT**.

Brad handed out copies of the new Farmers Market guide. It is printed in a booklet form and each county will receive a few of these, not sure how many. The brochure can also be downloaded and printed from the internet.

**New Business**

No new specific items were submitted for discussion.

## **District/Section Reports**

**Susan Plum-** Fairmont District: Susan wanted to know: what is “properly abandoned” for a septic tank if the tank cannot be crushed and left in the same spot. Can a tank be considered to be properly abandoned if it is moved to another location on the same property and then abandoned? Consensus of the group was to ask WVDEP if a landfill would allow a pumped tank to be accepted and not consider it hazardous waste.

**Brad Cochran-** Beckley District: Curt Richards provided no update information.

Brad gave an update from the Wheeling District for Lock Johnson. FLU clinics kept him from attending. All staff is participating. WOCHD received a grant to conduct additional CIA inspections for compliance.

Fairmont district: no update. Currently there is not a district sanitarian in the Fairmont office and the original address posted was incorrect. The correct address is: 9083 Middletown Mall, Whitehall, WV 26554. According to newspaper reports the state has asked the City of Fairmont and the County Commission to locate a new site for a permanent location. Brad estimates it will take approximately 3-5 years. The Fairmont and Philippi Offices will be combined at the new Fairmont location and the Philippi District Office will be closed.

OEHS has been notified that their office will be relocated to the Diamond Building in Charleston sometime in January. According to reports, DHHR currently located in Capitol Building 6, will be moving to the offices at One Davis Square (Capitol Building 6 is to be closed and renovated). Specific details are sketchy at this time.

Phil Jones retired on October 16<sup>th</sup>, 2009. Phil moved up his retirement date after his wife Linda fell and broke both legs. Clarence Christian retired October 30, 2009. The paperwork is being started to bring Clarence back as a 90 day exempt employee, since he is the only certified State Milk Survey Officer. Mark Uraco is currently being trained but still has not been certified. FDA certification will take place sometime next spring. Clarence will also work 2 days a week in the District Sanitarian position in Beckley since Beckley currently does not have a district sanitarian with Clarence’s retirement and Judy Vallandingham’s move to General Sanitation Program Manager in Charleston. Once Mark is certified as State Milk Survey Officer, one of the Beckley vacancies will be moved to the Wheeling Office. Richard Wheeler’s daughter had a bad car accident and Richard was off work, but his daughter is doing better and he has returned. Mingo and Logan counties have been added to the St. Albans district to even up the work load and align with the Engineers’ district. Brad stated it has been hard to shift work with vacancies, illness and retirement but there is light at the end of the tunnel. We are finally seeing the attrition loss of long time OEHS employees.

Week six of Sanitarian training class concludes 11-6-09. Two sanitarians will be finishing this week. Five will remain. Brad mentioned that there will probably be a FDA training course for Sanitarian Mid-year for one of the tracks. It may be “Special Problems in Food Manufacturing” but the course had not been confirmed yet. A Class II Septic Installers class is scheduled in Morgantown next week (November 9-12). There is also a one day course November 18, 2009 at Canaan Valley Institute on installation of LPP systems. Information regarding this class can be found on the PHS website. Next years’

IEHS will be held in Myrtle Beach in July. Agenda is not yet finalized. More information will be provided as received

Legislative session issues: revision of 64CSR 34 -Grade A Milk rule; 64CSR51-Fee for Service rule which would allow OEHS to charge fees and raise some fees such as the HAU permits; State Building Code and Fire code up for adoption of referenced federal code revisions.

**Don Thimpson- RTIA:** Don is new to West Virginia and the department. He is currently housed with RTIA but is hired as an epidemiologist and will work with Engineering, Public Health Sanitation, and OEHS. Don is going to get a computer data program called SPSS which will help organize data. This is a position that will be shared and relieve some of the burden from IDEP.

**Ryan Harbison-** District Sanitarian: Dave Cobb, PE will retire November 30, 2009. Ryan also filled in for Jessica Lucas, President of West Virginia Association of Sanitarians and handed out the minutes of the last WVAS Ex. Council meeting. The WVAS is currently working towards planning of Mid-Year meeting.

**Gail Sowards-** St. Albans District: Most everyone is busy with the FLU shots, both Seasonal and H1N1 Flu vaccinations. Kanawha County was assisted by state staff for the International Chili Fest Cookoff in October in Charleston held at the Power Park. Over 400 contestants were inspected in a 3 day period. KCHD would like to thank Linda Whaley, Judy Vallandingham and Ryan Harbison for their assistance before and during the event. KCHD used full and part time staff to cover the event. A good time was had by all.

**Mike Trantham-** WVU: Currently working on Phase 2 of a Municipal Storm Water program mandated by EPA and administered by WVDEP. He has worked with flu training and training volunteer groups at concession stands for the ball games. Mike said he now takes pictures of every concession stand at every game. Then if he has a complaint filed after the event he has pictures to prove allegations about food handling and glove use and other items. He has also instituted a program where any food service that has violations must answer to him how each items corrected (in writing) even if it is a non critical item. Mike just attended a seminar on the Virginia Graham Baker Act. Consumer Product Safety Commission is training people now to inspect for compliance of the act. The inspection program is not active yet.

**Denny Taketa** -Kearneysville District: No report since he is new and did not know exactly what how to proceed.

**Tim Miller-** Mid Ohio Valley Health Department: FLU we are all working on the FLU. Tim asked if food handler training and cards had been addressed. Brad stated that PHS is waiting to see if there will be legislative action on what types of classes might be acceptable for such cards.

Jonathan Graziani has been accepted into the South East Public Health Leadership Institute.

Next meeting is proposed for February and will be in Charleston. Brad will check on the meeting room.

## Grey Water Disposal in West Virginia

**Sewage:** Sewage is defined in both the Rules and the Design Standards as “...including, but not limited to, waste from commodes, urinals, lavatories, bathtubs, laundry tubs, washing machines, drinking fountains, sinks, kitchen equipment, and other sanitary fixtures or facilities.”

**Wastewater:** Wastewater is defined as “Water containing human, animal or domestic waste.”

**Grey Water (or greywater):** While not defined, is generally considered to include all domestic waste with the exception of that from toilet fixtures.

**Black Water: (Black Water is not mentioned in the Rules or Design Standards)**

From the Design Standards: Section 6.15.

6.15.a. Those houses served by a grey water disposal system shall have a house sewer of not more than two (2) inches in diameter.

6.15.b. Houses served by grey water disposal systems shall not have garbage disposal units connected to the grey water disposal system

6.15.c. Manufactured grey water disposal systems shall receive approval by the Commissioner.

6.15.d. Non-commercial grey water disposal systems shall consist of the following:

6.15.d.1. A soil absorption field designed on the basis of a thirty percent (30%) reduction in water usage, and constructed in accordance with the design requirements for the standard soil absorption fields; and

6.15.d.2. A septic tank sized according to the following:

6.15.d.2.A. For four (4) or less bedrooms, the minimum tank capacity shall be one thousand (1,000) gallons; and

6.15.d.2.B. For each additional bedroom, the minimum tank capacity shall be two hundred fifty (250) gallons per bedroom.

### Grey Water Concepts:

- Grey Water is sewage, and must be handled as such.
- No dwelling, regardless of age, can legally discharge grey water to the surface.
- Separate grey water discharges can no longer go to a subsurface “pit”, or “drywell” as were commonly installed in the past.
- All wash water (greywater) would normally go to a conventional septic tank system, however:
- As seen in the excerpts from the Design Standards above, separate grey water systems can be installed, although they still normally require a 1000g septic tank (6.15.d.2.A., above).
- Soil absorption fields (drainfields) receiving only grey water are allowed a 30% reduction in size due to the elimination of the bathroom waste (black water) (6.15.d.1., above).
- Grey water systems are typically proposed when someone wants to use a composting toilet, with the idea of “being green”, or, when wanting to take extra

precaution to protect a pond or stream from the greater number of pathogens in the black water.

The Public Health Sanitation Division has been considering the potential benefits of less-restrictive requirements for greywater disposal. There may be increased ability to accommodate waste flows from homes on existing small lots by using composting toilets (or other “blackwater” treatment) while perhaps allowing a lessened vertical standoff, and/or footprint requirement, for greywater soil absorption systems.

This is guarded optimism however, as the wastewater literature would indicate that the potential for both, solids and pathogens, is greater in greywater than most folks would assume. This is particularly true when the household is comprised of sick, elderly, or infant residents.

The volume of lint from washing machines is considerable, and is a clogging threat. Grease from the kitchen is often a big concern, depending on diet and cleaning habits. We know, and are constantly reminded, that teaching folks to limit grease discharge down the sink is a hard-sell.

WV took a step backwards, by some estimations, when in 2003 we mandated a 1000 g septic tank for greywater systems. Many greywater system designers advocate small tanks to prevent water from becoming septic (obviously, garbage grinders are prohibited in greywater system design). These small-tank systems often employ a screen to trap lint and food waste. This screen must be cleaned manually and often, subjecting the owner to potential exposure to pathogens.

Many “modern” designs (most of which use “old” technology) for greywater systems come out of California, where the systems are often not recognized, or accommodated by regulation. These often employ separate feeds of water to trees and flowerbeds, methods which are advocated by many folks we talk to. The potential for evapotranspiration by these methods is often mentioned as a major advantage. However, with the climate in West Virginia, ET will not be effective for 4-6 months out of the year. (Although the root zone will accept water quicker than other areas, providing yet an advantage to directing flow to vegetated areas.)

In spite of the regulatory constraints, and the potentially high owner-operation requirements, there is need to be open-minded and innovative in order to improve our abilities to handle wastewater on difficult sites. Usually this will be when there are existing failures. Section 9.1 of WV64CSR9 allows for leeway within the Rules to “abate public health hazards”. If the “black water” can be dealt with by a separate treatment mechanism, then allowances for reduction in vertical separation to bedrock, or seasonal water table, can be considered for grey water disposal when site limitations require it. Depending on soils and site conditions, there may be potential to reasonably reduce the absorption area beyond the 30% reduction normally allowed.

Some would advocate for the “old way” of separating out the washing machine discharge, to go to a “pit”. This is expressly prohibited. All types of systems must use shallow trenches. Pits are typically deep, intersecting bedrock and groundwater without prior treatment through suitable soil. There are considerable solids in the washing machine discharge. If a separate septic tank is not feasible due to space considerations,

there are specialized filters which can be fitted to a clothes washer that will effectively trap most of this material.

Please feel free to contact PHSD personnel with comments or proposals for handling grey water.

DRAFT