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My name is Stephen McLaughlin. I live in Wayne Maine and have been a Professional Engineer and Licensed Site Evaluator (septic system designer) for over 40 years. I am testifying on S.P. 634, "Resolve, Directing the Department of Health and Human Services to Amend Its Rules to Protect Water Quality by Reducing Nutrient Pollution from Septic Systems". While I am, generally, in support of the Resolve, I have questions and comments related to it.

Sec.2. 1. "Amending the design standards for disposal fields to add a requirement to address short circuiting by reducing nutrient loading from septic tank effluent through natural processes."

- What is the definition of "natural processes"? Is a nutrient removal manufactured treatment unit, available through wastewater treatment companies, not allowed? These units use processes that can be considered natural processes but are designed to be easily added between the septic tank and the leach field.

- Reducing nutrient loading by how much? 10 percent, 40, 60, 80 percent? 10 percent would, obviously, be much easier than 80 percent. A percent reduction or an upper limit in mg/L or parts per million? Assuming the Department of Health and Human Services (DHHS) would propose nutrient limits, will it also determine which soil profiles containing sand or gravel that pose a high risk of short circuiting? How would it determine how deep bedrock fractures would be to cause concerns?

Sec. 3. There is no time limit or deadline to accomplish rules regarding this topic. The Department, and particularly the Subsurface Wastewater Unit, has its hands full with dealing with the program as it is. With no additional funding to hire help or consultants, and no time limit, this rule making could be put in the "to do" pile, under all the other work it needs to do.

Sec.4. "That the Department shall complete the amendment...within existing resources and may seek staffing and financial support from other state agencies and private entities...". Be realistic. At least provide the Department with enough funds to hire outside help to investigate what the nutrient limit should be and treatment options that could be incorporated into the rules.

Thank you for considering these comments.