

Technical Review Panel
Environmental Public Health Division
Indiana Department of Health
Meeting Notes from May 9, 2025
10:00am – 2:00pm, Yoho Conference Room, IDOH and via Teams

Panel Members Present:

In Person:

Kelly MacKinnon, IDOH, OLA
Claude Goguen, NPCA, IOWPA rep
Amanda Lahners, LaPorte County Health Department
John Hack II, OSS Contractor
Jason Ravenscroft, academia
Mark McClain, IRSS (arrived at approximately 10:05am)
Dick Blazer, IBA

Via Teams:

Brian Neilson, PE, ACEC (left at approximately 12:55pm)

Others Present:

In Person: Mike Mettler, Alice Quinn, Erin Elam, IDOH
LA Brown, installer

Via Teams: Drew Cornell, Howard County Health Department
Heath Butz, Jay County Health Department
Jason Armey, Steuben County Health Department
Jessica Rutschiling, Adams County Health Department
Joshua Blauvelt, Gary Chapple, Allen County Health Department
Shelby South, Porter County Health Department
Chad Schofield
Joe Rakoczy, Julia Hayes, IDOH

MacKinnon called the meeting to order at 10:00am and indicated that the meeting was being recorded.

Minutes

Minutes of the April 11, 2025 meeting were reviewed.

Ravenscroft made a motion to accept the minutes as written; Hack seconded the motion.

Ayes: Ravenscroft, Blazer, Lahners, Hack, Neilson (McClain was not present for this vote)

Nays:

Motion passed.

Review of Proposed Revisions to Rule 410 IAC 6-8.3

Review of the proposed rule revisions based upon a letter received by TRP members from IOWPA and IBA, dated 4/10/25, continued from the last meeting.

- 54.5(d)((4)(D) Requirement for inspections – approximating the depth of installation from original grade was a concern. Original grade may not be able to be identified without a soil scientist. This

was changed to “Approximate maximum depth of installation from grade.” Final language provided by Hack.

- 54.5(d)(6) This was not on the IOWPA/IBA list. Brown questioned how underground piping was to be inspected and if a camera had to be used. Quinn stated this was just a requirement to walk over the area and check for sinkholes or wet spots. A sewer cam is not required. No change.
- 56(h) Submission of soil reports to the LHD by the soil scientist – Hack and Blazer felt this should include reports submitted by the owner. This is included in the model ordinance that was previously approved multiple times. All others disagreed. This remains as is.
- This was not on the IOWPA/IBA list. There was some discussion about a soil report is older than 2 years. Blazer stated that someone who has samples done but doesn’t build for 6 years. They buy a property based on the soils done, but 6 years later when they want to build, they are told they cannot. The purpose of a revisit to the site is to check for disturbance; it does not have to be reevaluated. Brown commented that sometimes the original soil scientist was not available to come back to the site and what happens then? He said that a different soil scientist will not come to reevaluate a site that has been evaluated by someone else. In many cases, another soil evaluation would likely be needed. There was no change proposed from this discussion.
- 60(c) Table III – Septic Tank Capacities – There is a typo in the table. 5+ bedrooms will be changed back to 1500 plus... as it is currently.
- 66(b)(1) Distribution box watertightness – There is concern about the ability to ensure the distribution box is watertight, especially after the gaskets are cut for pipe penetrations. Goguen said that distribution boxes can be watertight, meaning the structure is assembled and sealed and made watertight. D-boxes do not require the same pipe connectors as tanks require. Soil tight or water resistant is better. Quinn questioned if a gasket should be used to make it watertight. Goguen said someone has a sealant that is supposed to be removable and remains sticky. Hack is okay with the way boxes are now, and leaking d-boxes do not typically cause a system to fail. The verbiage here was changed to “The d-box material must be... (1) Watertight...”
- 66(d) Distribution box riser to or above final grade – Concern about distribution box risers to grade and securely fastened, yet still removable lids was discussed. Concern about unauthorized access if lids are to the surface but not secured. Goguen stated it should be the same as for tank risers. The requirements for box lids to be watertight and removable are in the current rule. Goguen stated that the concrete lid would need to weigh at least 59 pounds to be childproof. This section was not changed.
- 73 Table VI – OSS Selection Table – It was questioned why two of the numbers in the table were changing. Quinn advised that the two numbers being changed were in conflict with the verbiage of the rule in 71(b)(3). This has been known for many years and the verbiage in the rule came first and is correct. The verbiage in the rule was pointed out as 71(c)(3). The changes to the table will remain.
- P15L22 (46) This was not on the IOWPA/IBA list. Hack asked if this should be changed to 66 inches from “at least five (5) feet.” Excavation deeper than 5 feet requires special steps to be taken for protection. It was decided to leave it as is as this would still allow for evaluation down to 66”. No change.

McClain suggested and the panelists agreed to review the rule page by page. The following is a summary of the decisions made. (P=page, L=line number, rule section number in parenthesis). These are not necessarily in the order discussed.

- P2L8 (5.1) McClain asked if “natural resources commission” needed capitalizing. It does not.
- P2L21 (6) McClain was concerned about the requirement for an operable window and exterior door in the definition of bedrooms. The verbiage is “operable window or exterior door for emergency egress.” No change.
- P2L31 (7) A lot of discussion on the potentially outdated definition and the use of “bedroom equivalent.” McClain said it should be removed. Comparison to a hot tub was made. A hot tub cannot drain to the system. Hot tubs are generally not drained every time they are used, and they also have chemicals. Shower rooms are a concern at this time but not addressed by the rule. For now it will remain unchanged. McClain asked if it could be a policy at local health departments to deal with this. Neilson suggested referring to a water appliance with a certain capacity. The panelists were in agreement. Neilson stated that the gallons should be per use. At this time there will be no change. Neilson will develop some language for consideration for change for the next revision, not this current revision.
- P3L13 (8) McClain was concerned about use of “his or her.” MacKinnon stated it will remain as is due to OLA requirements.
- P5L9-10 (14) McClain stated the definition of drainageway needed to be changed. “Intermittently” should be removed or supplemented with “ephemerally and perennially” as in the Clean Water Act. It was decided that “gathers intermittently” was to be removed. Consensus to remove.
- P5L21 (14.1) McClain asked that this definition to be changed to removed “allowed”. Decision to change to “Sewage seeps...” Consensus to make change.
- P5L37 (16) McClain does not like the definition of fill. For now it will remain as is. McClain will look at for revision in the next revision.
- P6L13 (17) McClain stated that “ground water” should be “groundwater.” McClain said it should be consistent. MacKinnon said that it was a decision that needs to be made by LSA. This will be looked at to determine how often it is used in the rule and changed if possible.
- P6L23 (18) Ravenscroft asked if “local board of health” included a Health and Hospital Corporation. Elam researched this and it was decided to change this to “local department of health.” Consensus to make change.
- P6L33 (18.1) McClain requested that “or all” be stricken from the definition of high strength waste. The panel agreed. MacKinnon stated that LSA may strike this as well. Mettler stated our definition is consistent with the Consortium and EPA with this definition. Consensus to remove.
- P6/L49 Goguen stated that the smallest septic tank approved by IAPMO is 1000 gallons. Quinn stated that IDOH allowed a minimum tank size of 750 gallons. Quinn stated a change is proposed for the tank sections. No change to this definition.
- P7L13 (19.1) McClain requested a change to read “...performs inspections of existing on-site sewage system...” to “performs inspections of an existing on-site sewage system(s)...” Consensus to make change.
- P7L23 (19.2) McClain stated an Oxford comma is needed after “repair.” Consensus to make change.
- P7L44-45 (20.1) Ravenscroft questioned why condemnation of a dwelling was included in this definition. Quinn stated that while it could be voluntary because it was the occupant’s decision to live that way, but it could also be involuntary and poses a hardship either way. No change.
- P8L13 (20.2(b)(2)(B)) McClain requested that “and as approved by the department” be removed because it is not meaningful or necessary. McClain said it should be left up to the soil scientists and NRCS guidelines. It is not meaningful or necessary here. Consensus to remove.

- P10L20 (30 – to be removed) McClain stated that the definition of base flood elevation needs to have reference to the former term regulatory flood elevation. This is already proposed for inclusion in the definition of base flood elevation (5.1). No change.
- P11L14 (33) McClain stated that “a” was needed before “sanitary sewer.” Consensus to make change.
- P11L18 (33) Ravenscroft requested that “and environmental” be added before “health hazard.” Consensus to make change.
- P12L13, 17 (35.1) McClain requested that this be limited to installers and changed to “responsible charge of installers” in both lines. It is very commonly used in other professions. Consensus to make change.
- P13L46 (41.2) McClain stated that “home” needs to be changed to “house.” This definition was requested to be deleted in its entirety at the last meeting. No change.
- P13L49 (41.2) McClain stated that the term “sleeping spot” should not be use in the definition of sleeping spot. Quinn stated that the definition of sleeping spot was being removed from the draft rule.
- P14L26-27 (43.1) McClain requested that this definition to be changed from “...diameter drilling equipment used to pull soil cores out of the ground which are used for providing a description of soil horizons” to “...diameter soil sampling equipment used to pull soil samples out of the ground which are used to provide a description and characterization of the soil” rather than “description of the soil horizon.” Consensus to make change.
- P14L42 (44) McClain requested that “degree of” be removed. There are no degrees of acidity or alkalinity. Consensus to remove.
- P14L51 (45) McClain requested that “allowable” be removed. Consensus to remove.
- P15L11 (45.1) McClain requested that “, characterize,” be added after “observe.” Consensus to change.
- P15/L16 (46) McClain stated that the definition of “on-site soil investigation” be added because soil scientists are doing much more than analyzing the soil profile. Reference was made to section 56 On-site evaluation. MacKinnon stated that requirements were not supposed to be included in definitions. McClain stated he was okay leaving it as is. Consensus for no change.
- P15L20 (46) McClain requested that “, chemical, and biological” be added after “physical.” Consensus to change.
- P15/L22 46(1)) McClain asked that “at least” be removed and just leave it as a depth of 5 feet. MacKinnon stated that removing it would take away an option. McClain stated that he did not want to take away the option. No change.
- P15/L28 (47) McClain stated that since we defined soil scientist, we should define engineer and surveyor. The rule does not include these terms, so they cannot be defined in the rule.
- P15L52 (49) McClain requested that “coarse” be removed. Quinn asked if removing “coarse” was going to affect later on in the rule when it specifies that INDOT Spec 23 sand is the only sand that can be used in subsurface drainage. McClain stated that it would not affect it. Consensus to change.
- P16L13 (50) Legal question. McClain requested that the verbiage be changed here to reflect that the TRP approved TNI now rather than the department. MacKinnon will redraft this section for TRP review. Quinn asked if this would affect TNI approvals prior to the TRP. MacKinnon stated she would check the statute.
- P16L22 (50.1) McClain asked that “actual elevation” be added to the definition. Many he works with will use the actual elevation. Consensus for change.

- P16/L32 (50.2(1)) McClain asked about “not including lofts” is accurate. Quinn stated that this is from the International Residential Code.
- P16L33 (50.2) Quinn stated that the RV and camper have been removed from this section.
- P16/L27 (50.2) Quinn asked if the 300 gpd DDF set for tiny houses only applied to tiny houses or if it applied to all homes. McClain said that we should not set the minimum of 300 gpd for all homes because an ordinance was approved that way. McClain stated that the minimum should be based on one bedroom. Tiny houses will be different.
- P17L11 (50.5) Blazer stated that he tried to look up the definition of watertight, and it was going to cost him \$100 just to find out what it means. Several members requested that the reference to IAPMO Z1000 as it related to watertightness testing for distribution boxes be removed. Consensus for change.
- P17/L25 (51(c)) McClain stated that this needs to be reworded to account for recent legislative requirements. There is a new law with a very specific law dealing with how and when a LHD can enter a property. The two references to Indiana Code refer to the recent legislation. No change.
- P18/L11 McClain asked if dosing tanks should be added here. Quinn stated that the minimum requirement is a septic tank and a soil absorption field; not all systems include dosing tanks. Consensus was no change.
- P18/L12 (52(e)(1)(A)) Ravenscroft requested that “has not failed” be changed to “is not in failure.” Consensus for change. Quinn questioned whether this would affect a house that is vacant but had a failing system when it was occupied. MacKinnon stated that it was likely when the house was reoccupied, the system would fail again. Mettler stated that the goal was to get it repaired or replaced before someone moved back in.
- P18L39 (52(h)) McClain requested that the verbiage be changed here to reflect that the TRP approved TNI now rather than the department. There is a specific law now that deals with TNI, TRP and the department. MacKinnon stated it needed to be consistent. MacKinnon will redraft this section for TRP review.
- P18/L46 (52(i)) Blazer questioned whether the “easement” in this section could apply to anything and did they have to be official. Quinn stated that it only pertained to easements for OSS components and that the section required it to be recorded by the proper authority or commission, typically the county recorder’s office. No change.
- P19/L2 (52(j)(4)) McClain stated that it still bothered him that no one addresses where hot tub are to be drained. It is not addressed by Rule 410.
- P19/L2 (52(i)(5)) McClain stated that water softener discharge needed to be included in this list of water sources that should not go to the OSS. Mettler explained that as of right now this needed to remain and he would look into it further for the next revision.
- P19/L3 (52(j)(5)) McClain suggested adding “or biological” after “chemical.” Mettler indicated that sewage/effluent is biological in nature and is expected to be discharged to the OSS. No change.
- P19/L10 (52(l)(1)) Hack stated that this should be changed to “is not in failure and is not malfunctioning” to be consistent with previous verbiage change. Consensus to change.
- P19/L12 (52(l)(2)(A)) Blazer asked if there was no plan on file at the LHD could the system not be approved for connection or reconnection to an existing OSS. Quinn stated that at the end of this section there was an “or” that led to (B) which discussed what was to happen in the case of no plan. McClain questioned the “either” in (2), the “or” in (a), and the “and” in (b). MacKinnon stated she thinks it is correct. No change.

- P19/L21, 23 (51(l)(3)(A) and (B)) McClain and MacKinnon stated that there needs to be an “; or” at the end of (A) and an “; and” at the end of (B). Consensus to change.
- P19L31 (52.5) McClain stated that this needs to be limited to OSS installers. Consensus to change.
- P19L37 (52.5(b)) Blazer asked how pumpers and others who do not install systems are going to know that they need to be a registered installer to make repairs. Definition of installer was discussed. Brown stated that the only way that everyone who made changes to a system would get a permit to repair a system was if maintenance was required, but that was never going to happen. No change. Blazer suggested putting an advertisement on t.v. stating that anyone doing anything with a septic tank needed to be registered with the local health department. Ravenscroft stated that they had issued with abandonments and repairs, so he felt that this requirement was good. It was discussed and suggested that definitions for repair, replacement, and expansion be added to the rule. Goguen suggested language from St. Joseph County. Consensus for change.
- P19L44 (52.5(b)(2)(C)) Hack asked registration included a requirement for certification in another Indiana County. Quinn stated that is how IC 16-41-25-12(b) read, and it was copied from the statute. McClain and MacKinnon stated that this needed to be removed, and the statute referenced. This is because if the statute is ever changed, the rule would not have to be changed to reference the changed statute. Consensus for change.
- P19L49 (52.5(c)) McClain stated that “site” needed to be clarified that is only referred to the OSS installation site. There are a lot of assumptions and generalities, and it needs to be clarified. Consensus for change. Further discussion was held on the use of the word “site.” This needs to be looked at throughout the rule and confirmed for proper usage. A definition of “site” may need to be included in the rule. Hack suggested it means “at the permit location.” It could mean the whole site, the building site, the OSS site, etc. MacKinnon stated that we need to check to see if it is used differently in other areas of the rule. Ravenscroft asked if the perimeter drain is part of the OSS. Quinn stated it was part of the on-site sewage system but is not included as part of the soil absorption field. The definition of on-site sewage system was read to the panel.
- P20L24 (53(b)) McClain requested that the verbiage be changed here to reflect that the TRP approved TNI now rather than the department. MacKinnon will look at this section and possibly redraft this section for TRP review. McClain said that this needs to be consistent.
- P20L35 (53(d)(1)) Hack asked why pumps were included here. Quinn stated that this is because the rule requires 2 tanks in series or a 2 compartment tank if a grinder pump is used in the home. This is to ensure that the applicant discloses that information. Quinn clarified that this only applies to grinder pumps, not sewage ejector pumps. No change.
- P20L38 (53(d)(2)) McClain stated that the requirement for a floor plan needs to be removed from the rule and LHDs need to rely on applicants to provide correct information and the use of bedroom affidavits. Quinn stated that local ordinances were approved with the requirement for a floor plan vs a house plan. Consensus for no change. Blazer asked if this was only for new construction. Quinn stated that some local health departments require it for all permits and oftentimes it is hand drawn.
- P20L39 (53(d)(3)) Hack asked where the plat or legal description was to come from and if it could be obtained from someone other than a surveyor. Quinn stated that these are available in county offices and typically online; the purpose was to confirm property lines, easements, etc. on the property. No change.
- P20L45-46 (53(d)(5)(B)) There was much discussion about locating wells on adjacent properties and how difficult that is at times. Surveyors have the right to enter adjoining properties to complete the survey, but soil scientists, installers, and designers do not have access rights to other properties to go

look for well locations. McClain asked if we can have the same type of law that surveyors have. MacKinnon said that could not be done through the rule. Quinn asked if local health departments could enter adjoining properties to check for wells if proper notice was given. MacKinnon stated that if local health departments had enforcement authority over wells, they might be able to. Lahners stated it is likely that they would have to have a well ordinance in order to have enforcement authority. Quinn stated that at the last meeting, it was discussed to increase the requirement for wells in the area to 200'. Brown stated that it was fine as is. No change for this distance. It was decided that this should change and reference the separation distances table (Table I) of the rule and leave distances out here. Consensus for change. MacKinnon said this should be tabled until we get to the separation distances table discussion

- P20L49 (53(d)(5)(D)) Blazer stated that this needs to refer fixed reference points rather than a fixed reference point as discussed in the previous meeting. Quinn stated that this was also changed in the onsite soil evaluation section. MacKinnon stated that this version being used was not changed from last time.

MacKinnon paused the meeting for a restroom break. Everyone to be back at 12:15pm.

- P21L3 (53(d)(6)) McClain stated that he felt this section was too vague and should be removed. Quinn pointed out that it is very important because there was no way to list absolutely everything that may be needed as part of an application in this rule. MacKinnon stated that, as written, it would not be enforceable. The rule should specify what exactly is needed. She suggested that "anything necessary to verify compliance with this rule" be added to the section. Consensus for change.
- P21L8 (53(f)) McClain stated that "scale" needed to be "scaled." Consensus for change.
- P21L14-15 (53(h)) McClain suggested changing "compaction" to "compacting" and "removal" to "removing." Consensus for change.
- P21L28 (53(i)(2)) McClain stated that he would like this the ability to install to 48" be removed. Hack stated he liked this allowance. There was discussion that allowing installation to 48" in best judgment cases, when necessary, should be left in the rule. No change.
- P21L37 (53(j)) McClain stated that "or suspected" should be removed. It has to be confirmed. Consensus for change.
- P21L40-41 (53(j)) McClain stated that the plan for reducing wastewater strength should be approved by the health officer. McClain says it was too ambiguous. MacKinnon questioned what "appropriate" meant. Consensus for change.
- P21L50 (53(m)) McClain stated that "completed to the satisfaction of the..." should be removed and reworded. The discussion came to consensus with requiring the installation to be "completed in compliance with the rule and the approved plans and approved by the health officer or representative." Consensus for change.
- P22L1-20 (53(n) and (o)) McClain asked if we were bound to 12/21/1990 forever. He wondered if we had to keep that. Mettler said that the rule was passed in 1990 and included this. There was discussion about this section of the rule and if it could be removed. McClain stated it was not needed because there is already a law that says if the land was platted prior to a certain date, it could be built on regardless of soil conditions. For now, it was decided to leave this section as is, but it may be looked at more closely for a future revision. No change.
- P22L25 (54) McClain stated that this sections needs to reference in accordance with the site entrance where the local health department has stipulations to enter the property. Mettler stated

that the issuance of the operating permit is granting access to the local health department for inspection. No change.

- P22/L30 (54(a)) McClain questioned the use of “interim standards” here. McClain stated that a “standard” is a very rigorous, peer-reviewed process like ASTM. Health departments do not make standards. Standard would be in accordance with TNI approved by the TRP. Mettler stated that IDOH will look at that. Neilson stated that INDOT had 3 types of interim standards: Unique (temporary), recurring, and standard specs. It was suggested that this just be changed to allow operating permits for any system permitted. MacKinnon agreed to look into the use of “interim standards”. For now the section will be changed to say for any OSS permitted.
- P22/L52 (54(f)) Blazer commented that the owner is not likely to tell the LHD that a service contract was discontinued. It was suggested to add that the owner or the service provided notify the LHD of a service contract discontinuance. Consensus for change. Hack asked if an operating permit required a service contract. Ravenscroft said that TNI required a service contract, but best judgment does not require a service contract and holding tanks should require service contract. Quinn stated that (d)(2) requires a contract and was already in the existing rule. It was questioned whether legislation passed in the past required a certain timeframe for service. Mettler stated that bill was passed quite a while ago. Quinn read the statute and no timeframes were in the current statute.
- P23/L48 (54.5(d)(3)) Blazer stated that he did not think it was possible to check for watertightness of a d-box that is underground if you take the top off of it. Quinn asked if you could see roots in the box. Blazer stated that roots were very unusual in a d-box. Blazer stated that he did not like “the box should be thoroughly inspected...” “Soil tight” has not been used in the rule. Quinn read the definition of “watertight” which, for distribution boxes, references a visual examination or a test similar to that described in IAPMO Z1000-2019 9.1.3. Goguen said that refers to a hydraulic, air, or vacuum test which he has never heard of for a distribution box. It was agreed to change this to visually inspected. The visual inspection would apply to any distribution box. Consensus to change.
- P23L52 (54.5(d)(3)(C)) Hack stated that “weep hole” should be “vent hole.” It is technically a vacuum break so that it would not suck water back to the dosing tank. There was consensus that if this was changed here, it should be changed elsewhere in the rule for consistency. It is only located in 2 other sections of the rule. Consensus to change.
- McClain questioned if wastehaulers were licensed. They are licensed through IDEM.
- P24L8 Goguen said something was supposed to be changed there. The change discussed at the last meeting was to require the measurement just “from grade.”
- P25L26 (56(c)) Blazer stated that “good coverage of the entire soil absorption field area” was too vague. McClain said it should be left general. There were no suggestions of how to reword this, so, for now, it was left as is. McClain said that it should be up to the discretion of the soil scientist. Quinn stated that in some respects it needs to also be at the discretion of the local health department in case the system is shifted, etc. and they need to be able to require additional borings.
- P25L28 (56(d)(1)) Hack asked if this should be changed to at least 5 feet or to 66”. As discussed earlier this is to remain unchanged.
- P25L38 (56(f)(1)(E)) Goguen stated that this needed to reference at least 2 fixed reference points as decided in a previous meeting. Consensus to change.
- P26L4 (56(f)(2)(M)) Hack asked why frost penetration depth was required on the soil report. McClain explained that frozen soils could not adequately be described.

- P26/L11 (56(h)) Hack and Blazer stated that the homeowner should be able to provide the soil report to the LHD. McClain indicated that it should come from the soil scientist directly to the LHD. Consensus was to not change.
- P27L11 (57(d)) Hack stated that sewers under a house may be closer than 50' to a water supply well. Mettler said that sewers under a house do not apply to this rule. It was discussed that LHDs do not have authority for piping under the house. Hack asked why they need to be 50' from the well when outside the home. No change.
- P27L39 (58(a)((2)(E)) McClain stated that fragipan needed to be added here and that a definition of fragic properties needed to be included in the rule. McClain stated that if a soil had fragic properties, even if it did not meet the definition of fragipan, the soil should be considered limiting. He offered to provide that definition. Mettler questioned if this definition was needed since the rule references NRCS. McClain stated that NRCS also defines densic, which is also in the rule.
- P30L23 (59(h)(3)) Hack stated that more important than not having any sags in the line, this should also say that there should be no high points. High points need to be added. It was noted that this does not change how the drainage is to be installed, so there is no associated cost. Consensus for change.
- P30L24 (59(i)) McClain stated that it is unnecessary for aggregate backfill to be required in drainage systems. There was no further discussion at that time. No change.
- P31L2-3 (60(a)(1)) Goguen stated that the IAPMO reference needed to include sections 5, 6 or 7. Quinn stated that "non-concrete material" needed to be changed to "fiber-reinforced polyester or thermoplastic material" to be consistent with IAPMO terminology. Consensus for change.
- P31L5 Hack questioned if the use of a stainless steel tank would it be allowed since metal tanks are prohibited. No further discussion.
- P31L36 (60(i)) McClain asked where the requirement for water softener backwash to discharge to the OSS came from. He questioned if IDEM would classify the backwash as a "waste." Ravenscroft said under the spill rule that it would be classified as an objectionable substance and multiple state rules would support that. Quinn stated that both the Clean Water Act and IDEM had language similar to 52(a) of this rule, and that section prohibits discharge of organic or inorganic materials. Mettler requested it remain for now and have it looked into in the future. Consensus for no change.
- P32L12 (61(d)) Goguen stated that (d) and (e) seemed to conflict. Quinn stated that the outlet filter could be installed in a secondary basin after the septic tank in which case, (e) would apply to the septic tank. No change.
- P32L29 (61(j)) Goguen stated that this needed to be changed to say a "minimum" 4000 psi and that "designed to withstand all structural, hydraulic, hydrostatic, earth loads, and any anticipated traffic load, and" to this sentence. Consensus to change.
- P32L36 (61(n)) Goguen said that "ASTM C 1116" needs to be included before "type III fibers." Consensus for change.
- P33 Goguen asked if secondary safety devices were required in dosing tanks. Quinn stated that it was in section 63 and referred to the statute rather than spelling out the requirement.
- P33L22 (62(a)) Quinn stated that "non-concrete material" needed to be changed to "fiber-reinforced polyester or thermoplastic material" to be consistent with septic tank terminology. Goguen and Quinn stated that the reference to the IAPMO here needs to be removed as IAPMO does not contain standards for dosing tanks.

- P33L26 (62(c)) Goguen stated that this needed to be changed to say a “minimum” 4000 psi and that “designed to withstand all structural, hydraulic, hydrostatic, earth loads, and any anticipated traffic load, and” to this sentence. Consensus to change.
- P34 (62.5) Quinn asked if the rule should specify that a holding tank be a septic tank. The consensus was yes, but MacKinnon stated that it just needed to reference the Indiana Code here rather than specify what it needs to be.
- P34L15 (62.5(b)(1)) Quinn stated that “non-concrete material” needed to be changed to “fiber-reinforced polyester or thermoplastic material” to be consistent with septic tank terminology. Goguen and Quinn stated that the reference to the IAPMO here needs to be removed as IAPMO does not contain standards for holding tanks. Consensus to change.
- P34L38 (62.5(h)) Goguen said that “ASTM C 1116” needs to be included before “type III fibers.” Consensus for change.
- P35L16 (63(b)) Goguen questioned whether concrete tanks were still made with drain holes. Goguen said that they try to encourage manufacturers not to use drain holes in tanks. It was decided to leave this for a later revision.
- P36L23 (64(f)(5)) Hack questioned why the outlet filter was required to be solvent welded to PVC Schedule 40 pipe, but they do not have to use Schedule 40 pipe. Quinn explained that the Sch 40 was required to connect to the filter and go through the tank wall for stability. No change.
- P37L16 (65(e)) Quinn stated that there was a lot of concern about NEMA 3R being included here, especially in Allen County who had examples and documentation. Quinn stated that Allen County would be okay using NEMA 3R if they were not allowed to be installed in the dosing tank riser. It was agreed to remove NEMA 3R. Consensus to change.
- P37L34 (66(b)(2)) Hack questioned how distribution boxes were to be constructed to be resistant to corrosion and decay. Goguen discussed coating of the interior of the box and encourages coating distribution boxes. Quinn stated that concrete additives were being used a lot without coating. No change.
- P38 (67) Brown asked what changed with pipe specifications. Quinn stated that the years of the standards were updated and ASTM F405 because it has been incorporated into the ASTM F 667 standard.
- P38L23 (67(a)(1)(B)) Hack asked if ABS pipe could be removed from the rule. It may be used under manufactured home and might be supplied to the site for connection to the septic tank. It was decided to leave this for a future revision.
- P38L25 and 38 (67(a)(1)(B)(ii) and (c)(2)) Goguen stated that the 2020 after the D 2680 needed to be changed to just 20 and that the 2021 after D 2729 needed to be changed to just 21. Consensus for change.
- Hack stated that there needs to be a 0.40 gpd/ sq. ft. soil loading rate somewhere because there is a big difference between 0.30 gpd/ sq. ft. and 0.50 gpd/ sq. ft. Mettler stated that those changes need to be addresses in tier 2 of the revisions.
- P47 Quinn stated that the equation here and in other similar sections are being changed to just be the design daily flow divided by the soil loading rate, rather than using 150 gal or 75 gal.
- Hack asked if sand lined system will ever become part of the rule. Mettler indicated that this would be a major change with 3 different manufacturers. This should be saved for a future revision possibly.

- P47 (74(b)) Brown asked if this section requiring the area of the soil absorption field to be protected could include sand lined systems. Quinn said that because the sand lined system manual were silent on this, the default would be the rule, so they would be included.
- P66 Ravenscroft asked if a contractor must remove all piping, chambers, and distribution boxes and disposed of at a licensed landfill if that was always required. Quinn stated that this was only required if the soil absorption field was to be removed. If it is to be left in place, it does not have to be disposed of as in (e).

The plan forward was discussed as having all of these rule changes made before the next TRP meeting and to have the regulatory analysis updated to reflect these changes. MacKinnon stated that OMB required a line by line analysis of the changes to be included in the Regulatory Analysis. The Regulatory Analysis must account for the first 2 years of financial impact. If the 2 year cost is over one million dollars, it must be presented to the Budget Committee. MacKinnon asked the panel members to review the regulatory analysis they received today with expectations that it would change due to the rule changes discussed at this meeting.

The subject of operating permits was brought up again by Hack and he wanted to know if they could be required for any system – even new and gravity. Brown stated that Allen County required operating permits and the legislator from there was adamantly opposed to operating permits for some systems, like those that serve just a pole barn. Brown said that Allen County even provided services for the homeowner such as cleaning the outlet filter, typically at a cost less than what a service provider would charge. He said there is good and bad in it.

P22/L29-32 was discussed again in reference to operating permits may be required by the local health department. Hack was opposed to having this apply to all system types. Ravenscroft says that he has seen local health departments overstep their authority and he doesn't want to see that with operating permits. This will be discussed further at the next meeting. Ravenscroft asked about recent legislation that changed statute to be more restrictive on operating permits, but would include those systems permitted under best judgment. Quinn read this section of IC 16-19-32-27 pertaining to operating permits. Systems with outlet filters was removed, but it still includes all sand lined systems, reduced size chamber systems, and anything with TNI.

The next meeting is scheduled for June 27, 2025 from 10:00 am to 12:00 pm EST. MacKinnon said that she hoped both the rule revisions and the regulatory analysis would be approved at the next meeting. All updated documents will be sent out at least 2 weeks prior to the next meeting.

Lahners made a motion to adjourn the meeting, and it was seconded by Ravenscroft. The meeting was adjourned.