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Please advise us immediately of any transmission problems at 877-827-8255.

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Phone: (307) 777-6941

Attn: WILLIAM TILLMAN

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From: MIKE VAUGHN

Date: 6/22/15

Number of Pages Including Cover: 2

Subject: RESPONSE TO PROPOSED CHANGES TO SEPTIC TANK RULES

Comments: PLEASE REFER TO THE ATTACHED RESPONSE & LET ME KNOW IF THERE ARE ANY QUESTIONS OR CONCERNS.

Thank You!!!

Our Fax #877-827-7363

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June 22, 2015

Wyoming Environmental Quality/Water Quality Division Council
122 West 25th Street, Herschler Building - 4W
Cheyenne, WY 82002
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Response To Proposed DEQ Rules Governing Construction Of Septic Tanks

To Whom It May Concern:

This letter is written in response to the proposed changes to Section 9 of Chapter 25 of the DEQ rules governing construction of septic tanks.

Our Standard Precast Concrete Tanks are manufactured per ASTM ^{C1227}~~C1277~~, the Standard Specification for Precast Concrete Septic Tanks. I find it odd that DEQ is not adopting or referencing this ASTM. It would be appropriate to state that all Precast Concrete Septic Tanks shall satisfy the requirements of ASTM C1227.

I offer the following comments to the specific content listed in Section 9 that I take exception to.

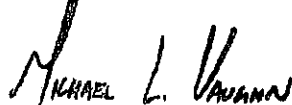
- *Section 9(a)(iv)(E)(III) A minimum of three (3) inches of clear space shall be provided over the top of the baffles or tees.*
 - We have been manufacturing tanks for over 30 years, and some of our tanks do not provide 3" over the top of the pipe at the inlet end. The goal is to provide a minimum of 10% free air space over the liquid level of the tank and a means for air to pass between compartments.
 - We typically extend the tees into the access openings to ensure 3" clear space over the top of the tees & baffle.
- *Section 9(d)(x) The dividing wall between compartments shall be the same height as the other walls and the cover must contact the top of the dividing wall.*
 - This needs to be changed!
 - It should not be a requirement that the divider wall extends to the ceiling of the tank.
 - It is important to have free air space across the area over the top of the liquid. Similar to a septic tank, this is critical to equalizing the environment, thus promoting the anaerobic process required for digestion of contents.

It should be a requirement to have an access opening in the lid/roof over the divider wall to allow the environment to equalize, thus promoting the anaerobic process in both Septic Tanks & Grease Interceptors.

The proposed requirements would force most manufacturers to change their forms, causing a significant cost increase to the consumer. Adopting the ASTM C1227 Standard is the only responsible solution.

I am a Civil Engineer registered in 17 states, including Wyoming. I have been very involved in the precast concrete industry for over 30 years and have served on the ASTM Committee. If anyone has any questions and/or concerns with my comments, please contact me.

Sincerely,



Mike Vaughn, PE
President