

A well-integrated proprietary products listing rule would:

- **PRODUCT**

- allow for performance testing from variety of providers including:
 - National/International testing facilities
 - Demonstration projects where testing is done at temporary installations in Arizona
- ~~List-Submit~~ O & M activities required to assure a 20 year life while producing the -listed effluent quality. Include the list in the approval doc or reference the O & M Manual prepared by the manufacturer. Not a warranty.
- Provide an Assessment of risk of not consistently achieving effluent quality – Risk Class
 - May be used to justify permit renewal, and/or increased o & m requirements, and /or effluent quality testing.
- Manufacturers to provide initial & continuing training to regulators, installers, inspectors, O&M providers
- ~~State product performance in applications with and without gray water inclusion.~~ Manufacturer provides statement as to the inclusion of grey water and household water treatment system discharge (eg water softer) in the waste stream.
- Manufacturer to address start up time and vacation or part time operation impacts
- BC - Address “Orphan” systems (manufacturer not support their system, gone out of business, no parts) risk goes up, so O & M requirements, effluent testing, permit renewal increase.
- BC - Offer advice as to what qualifications and certifications inspectors (regulatory and A-316), designers, installers and service providers that work on PPL listed systems should have.
- BC - Hone our work on what a Technical Advisory Committee looks like and does.
- BC – Advise on how the program is funded. Operating Permits?
- BC – Ensure the homeowner, both current and future; understand the technology, requirements, and their responsibilities.
- ~~BC – Water softener effects on treatment and or warranty.~~

Comment [SSE1]: There was significant discussion on requiring in situ testing program for every product. Some were for and against.

Comment [SSE2]: Provide Needs-to-know for the (Enforcement? A316? O&M?) Committee working on the inspector qualifications.

- **PROCESSES/CRITERIA**

- Codify a new product acceptance procedure which would allow for local/state testing (in situ testing or field conformation of performance claims)
- Be fair to all applicants
- Allow for the listing of new types of technologies. General treatment technology rules that can be applied to any widget.
- Require all technologies to be reviewed periodically or when data shows that the technology is not performing per the listing

- Statistically based (random) periodic in service field verification of system performance and environmental impact and compare to product listing.
- Be an appealable agency action
- Geographic or environmental approval restrictions/limitations of listed product
- Alternative listing process emulating the A312G Variance procedure to allow for unforeseen situations.
- Address remediation technologies and additives.
- There should be a Technical Advisory Committee to assist ADEQ with PPL issues.
- Determine what is acceptable test data with respect to **parameter**, averaging time, number of discrete points, quality assurance, etc;
- Determine the adequacy of the test setup to reflect real world design and use of the facility/technology and assure comparability to actual rule provisions for design and installation; and
- Determine how test data are transformed into “recognized treatment performance” in the Product Listing Notice (or whatever the ADEQ listing certificate becomes).
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Comment [SSE3]: Includes: BOD, TSS, N, Coliform (indicator organism), other (alkalinity, temperature)

FUNDING

- Advise on how the program is funded. Operating Permits?

OTHER

- A316A-Ensure the homeowner, both current and future; understand the technology, requirements, and their responsibilities.