EPA
United States
Environmental Protection
Agency

Promotion of Data Sharing for States' Approval of Advanced Onsite Systems

Joyce Hudson
U.S. EPA
Office of Wastewater Management

Mark Nelson
Horsley Witten Group

November 7, 2014

Background

- Began with Onsite Model Program for the Chesapeake Bay Watershed
- Developed whitepaper on data sharing opportunities and constraints.
- Developed overview of Chesapeake Bay State approval processes.
- Productive discussions with state programs over 8 months leading to bay wide testing protocols

EPA United States Environmental Protection Agency

Background

- **Developed two protocols:**
  - Initial Data Collection
  - Field Performance Verification (Test Plan)
- **Based in general on NSF protocols**
- **Gaining general consensus with exceptions**
- **Focus is on <u>DATA SHARING</u> not** *reciprocity*

Variations from NSF Standards

Chesapeake Bay Data Protocols	NSF Standards
Minimum of 12 systems tested	Minimum of 20 systems tested
MD and PA require 6 systems to be tested within their state borders	Not specified in NSF 360, but under most state approval programs, the majority of systems are tested in-state
Effluent will be tested using 24-hour composite samples	Not specified in NSF 360, option for grab or composite to be described in Test Plan
Default influent value of 60 mg/L is assumed	Influent sampling required twice during field testing
Winter/cold weather sampling required	Not required
Non-carbonaceous geologic formation sampling required	Not required

EPA United States Environmental Protection Agency

Test Plan Application

- Based on the test plan template in NSF 360
- Used as the application to field test a system after initial or provisional approval is granted
- Highlights the differences between NSF standards and the requirements agreed upon by the states
- Does not include performance criteria for each state
- Ensures field verification data is collected in the same way

EPA United States Environmental Protection Agency

Letter Agreement

- Informal Memorandum of Understanding signed by one representative in each state
- Provides certainty to the manufacturing community that the data protocols will be accepted and used
- Validates the time and effort the states gave to collaborate on data sharing

EPA United States Environmental Protection Agency

Process

- Efforts started with a common goal on restoring the Bay
- Regular bi-monthly meetings with Chesapeake Bay states over the past 8 months
- Effort awareness at various conferences and meetings
- Discussion with NSF International, Inc.
- Discussion with NOWRA and the manufacturer community

EPA United States Environmental Protection Agency

Benefits of Data Sharing

- Improve the quality of data collected
- Accelerate the approval process and installation of advanced systems
- Reduce the burden on states to monitor and evaluate performance data
- Reduce the burden on manufacturers to test systems
- Reduce the cost of the system to the customer

Benefits of States Collaboration

- Some states have adopted more stringent requirements
- Experienced states have provided guidance to states who are under or considering regulations review
- Process established better working relationships between the states
- Successful example of states collaborating together serves as a good model for the national stage

EPA United States Environmental Protection Agency

Final Steps

- **Finalize the data collection protocols**
- **Obtain signatures on the Letter Agreement**
- **Communicate to stakeholder community when ready to launch new protocols**
- **Collaborate with Chesapeake Bay Program to store and retrieve onsite data**