

TOWA INSIDER

The official Texas On-Site Wastewater Association Newsletter

QUARTER 1

MARCH 2025

President's Letter

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Welcome to the latest edition of the Texas On-Site Wastewater Association (TOWA) newsletter! As we navigate the evolving landscape of on-site wastewater management in the State of Texas, our commitment to innovation, compliance, and education is constant and unwavering. TOWA has made great strides on education for Installers, DR's, RS's, Maintenance Providers, their technicians and homeowners. This is the Golden Age for the on-site wastewater industry but we all must do our part to protect the people and environment of the State of Texas to ensure clean water for the future generations.

Non-Standard Systems rules have been in Chapter 285 regulations for over two decades that are now being enforced. This is much bigger than we previously thought, with thousands of Non-Standard systems having been installed in Texas for the past 35 plus years that are now having performance issues due to improper design. In the past most of the designs were based on gallons per day (flow) only, not on mass (BOD) and flow. Especially with residential NSF ATU's, proper calculations for high strength wastewater influent and flow equalization is critical for adequate performance. Flow equalization needs to mimic the NSF daily dosing scheduled protocols and is critical to the design of Non-Standard Systems. These two major aspects (Flow Equalization and BOD loading rates) are the most important design criteria a designer must consider. Chapter 285 Rules for Non-Standard systems require an additional review by TCEQ to ensure the Non-Standard System not only meets minimum regulations but also meets the real-world needs of each commercial facility. All Non-Standard Systems should be forwarded to TCEQ for additional review by the Executive Director unless the DR performing the initial review has authorization from TCEQ to review that specific design of a Non-Standard System.

Get involved with TOWA and your local TOWA Chapters. If you are interested in starting up a TOWA Chapter, please reach out to a TOWA Board member.

When you come to the 2025 TOWA show please take a moment and thank the vendors and sponsors for attending the show, which keeps your cost to attend the show affordable. If it was not for the vendors and sponsors, we could not put on a show like this for all of you. I want to thank the entire TOWA Board, Krista Richter and her staff for everything in putting on this great show.

Thank you,

Steve Murdock

TOWA President

Don't Miss the Largest On-Site Wastewater Conference in the Southwest! March 17 – 19, 2025 in Galveston, TX

Compete in the Roe-D-Hoe Contest - Buckle & Cash Prizes! *Beginners Welcome!

Optional Pre-Conferences Classes & Post-Conference Tour!

Largest OSSF Exhibit Hall & Outdoor Display in the Southwest!

Networking & Sharing Resources to Improve OSSF. Invite your Designers, Engineers, Installers, Maintenance Providers & Local Agents!

CE hours for engineers & OSSF licenses! *Main conference offers 10.5 CE hours!

Tuesday Lunch & Reception Included

Enjoy Happy Hour with Silent Auction, Raffles & Drawings!



Local Chapters

Local chapters are a great way to share information and network. Chapters can coordinate local Continuing Education opportunities through TOWA. Active chapters as of January 1, 2025, include:

Cedar Creek Lake – Mabank , TX

Duane Wadel

903-910-7578

duane@lsmconsultingtexas.com

North Central – Waxahachie, TX

Brian Wakefield

972-921-6619

bswakefield@yahoo.com

Heart of Texas – Temple, TX

Ronald Moomaw

254-554-1219

ronaldmoomaw@gmail.com

Panhandle – Amarillo, TX

Kateland Pierce

806-443-5533

kateland-pierce@outlook.com

To start a local chapter, contact Randy Chelette at randy@txowa.org or Steve Murdock at SMurdock@infiltratorwater.com

Industry Updates

Legislative day

On Monday, January 27, 2025, several members of TOWA met at the State Capital to dedicate a day meeting with State Representatives and their staff. This was a great opportunity to discuss our industry and its impact on protecting water quality in Texas. We were also able to highlight the recent accomplishments with the \$10 research fee collected with every permit. Thank you to everyone who volunteered their time at this legislative day.

TCEQ Licensing Update - Licensees can now authorize the release of their contact information

As required by SB 510 of the 88th Texas Legislative Session, email addresses, phone numbers, and home addresses were deemed confidential and exempt from disclosure under Section 552.11765 of the Public Information Act. As a result, this information was withheld from public viewing on TCEQ's website effective September 1, 2024. This has made it difficult for customers and/or employers to reach out to licensees for potential business or employment opportunities.

The Public Information Act under Section 552.229 allows for people to consent to the release of information that is excepted from public disclosure if they are 18 years old or older and the consent is in writing. Consenting to making your information available to the public on the TCEQ website is completely voluntary and may allow potential customers and employers to reach you.

Please visit tceq.texas.gov/licensing to complete the Authorization to Release/Display Confidential License Contact Information form if you wish to have certain information made available on TCEQ's Website. You may update or revoke this authorization at any time by sending an email to licenses@tceq.texas.gov.

TOWA INSIDER NEWSLETTER

The TOWA Insider Newsletter will be DIGITAL!
New & Improved - Emailed Quarterly to Members

Send Chapter updates, Member articles, Pictures, Suggestions, Education info or Product articles to Editor: Ryan Gerlich - ryan.gerlich@infiltratorwater.com.



Clarifying the current rules regarding nonstandard systems designs

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 21, 2022

Mr. Randy Chelette
Executive Director
Texas On-Site Wastewater Association
PO Box 885
Bridge City TX 77611
randy@txowa.org

Subject: Nonstandard System Designs

Dear Mr. Chelette:

In response to your email, I would like to help clarify the rules that are in place regarding nonstandard system designs. I understand that the Texas On-Site Wastewater Association (TOWA) has received numerous complaints that inadequate nonstandard system designs are being submitted to Authorized Agents (AAs) by both Professional Engineers (PE's) and Registered Sanitarians (RS's), and then reviewed and approved by AA's without the Texas Commission on Environmental Quality's (TCEQ's) review and approval. I would like to remind all AA's, designated representatives (DR's), PE's, and RS's that the following rules exist and are to be followed.

All permit applications that include nonstandard planning materials as described in 30 Texas Administrative Code (TAC) §285.5(b)(2), nonstandard treatment systems as described in 30 TAC §285.32(d) and subsection (d)(1), and nonstandard disposal systems as described in §285.33(d)(6) must be submitted to TCEQ for a 10-day review prior to the AA's review and final authorization to construct (ATC) issuance. Please note that holding tanks that meet the requirements of 30 TAC §285.34(e) and composting toilets that meet the requirements of 30 TAC §285.34(f) are not considered to be nonstandard systems.

In addition to the TCEQ review requirements above, 30 TAC §285.32(d) and 30 TAC §85.91 (Table 9) below specifically indicate that only a PE is allowed to design a Non-Standard Treatment system when secondary treatment is required.

System Description	System Type	Planning Materials To Be Prepared By R.S or P.E.	Installer Requirements
Non-Standard Treatment when Secondary Treatment Required	Non-Standard	Engineer Only	Class II

Please contact Donna Cosper, P.E., with the TCEQ OSSF Program at donna.cosper@tceq.texas.gov if you have questions on these requirements.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Gates".

Marilyn Gates, TCEQ Program Support Section Manager

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Section 285.5 describes when the authorized agent or permitting authority is required to submit planning materials to TCEQ for review. TOWA has received several complaints of authorized agents reviewing non-standard planning materials. We believe there is a misconception of what non-standard planning materials are and what should be reviewed and approved without submitting to TCEQ for review prior to the AA's final ATC approval.

§285.5. Submittal Requirements for Planning Materials.

(b) Review of planning materials.

(1) Standard planning materials. All planning materials for standard treatment or disposal systems shall be reviewed by the permitting authority.

(2) Non-standard planning materials. The executive director shall review and respond to initial plans for all non-standard planning material for any system described in §285.32(d) of this title and §285.33(d)(6) of this title (relating to Criteria for Effluent Disposal Systems) within ten calendar days of receipt of the planning materials. After favorable review by the executive director, the same non-standard system planning materials may be reviewed and approved by the authorized agent for different locations, provided the same site conditions exist for which the planning materials were developed.

(3) Proprietary planning materials. Planning materials for proprietary treatment or disposal systems, as described in §285.32(c) or §285.33(c) of this title, shall be submitted to the executive director for review. The systems and the testing protocol shall be approved by the executive director before the systems can be installed in the state.

§285.32. Criteria for Sewage Treatment Systems.

(c) Proprietary treatment systems. This subsection does not apply to proprietary septic tanks described in subsection (b)(1) of this section.

(1) Tank sizing. Proprietary treatment systems that serve single family residences, combined flows from single family residences, or multi-unit residential developments shall be designed using Table II in §285.91(2) of this title unless there is an equalization tank preceding the aerobic treatment unit. If there is an equalization tank preceding the aerobic treatment unit, the equalization tank shall meet the requirements set forth in §285.34(b)(4) of this title (relating to Other Requirements) and the aerobic treatment units can be sized using the wastewater flows in Table III in §285.91(3) of this title. Proprietary Treatment systems for non-residential facilities shall be sized using the wastewater flows in Table III in §285.91(3) of this title. Leak testing shall be performed in accordance with subsection (b)(1)(H) of this section

(A)(i) Proprietary units under this section have been approved to treat flows equal to or less than their rated capacity and with an influent wastewater strength ranging from a 30-day average Carbonaceous Biochemical Oxygen Demand (CBOD) concentration between 100 milligrams per liter (mg/l) and 300 mg/l and a 30-day average TSS concentration between 100 mg/l and 350 mg/l.

(ii) Proprietary units may be used as components in an overall treatment system treating influent stronger than the ranges listed in this section. However, the overall treatment system will be considered a non-standard treatment system and shall meet the requirements set forth in subsection (d) of this section.

(d) Non-standard treatment systems. All OSSFs not described or defined in subsections (b) and (c) of this section are non-standard treatment systems. These systems shall be designed by a professional engineer or a professional sanitarian in accordance with §295.91(9) of this title, and the planning materials shall be submitted to the permitting authority for review according to §285.5(b)(2) of this title (relating to Submittal Requirements for Planning Materials). Upon approval of the planning materials, an authorization to construct will be issued by the permitting authority.

(1) Non-standard treatment systems include all forms of the activated sludge process, rotating biological contactors, recirculating sand filters, trickling type filters, submerged rock biological filters, and sand filters not described in subsection (b)(2) of this section.

(f) Other Design Considerations.

(1) Restaurant/food establishment sewage. When designing for restaurants, food service establishments, or similar activities, the minimum design strength value shall be 1,200 mg/l Biochemical Oxygen Demand (BOD) after a properly sized grease trap/interceptor. It is the responsibility of the designer to properly design a system which reduces the wastewater strength to 140 mg/l BOD prior to disposal unless secondary treatment levels are required.

(2) Other high-strength sewage. For situations where sewage as defined in this chapter is expected to be a higher strength than residential sewage, it is the responsibility of the professional designer to justify sewage design strength estimations and properly design a system that reduces the wastewater strength to 140 mg/l BOD prior to disposal unless secondary treatment levels are required. Residential sewage is sewage that has a strength of less than 300mg/l BOD.

(9)Table IX. OSSF System Designation

System Description	System Type	Planning Materials To Be Prepared By R.S or P.E.2	Installer Requirements
Non-Standard Treatment when Secondary Treatment Required	Non-Standard	Engineer Only	Class II

TOWA has received several calls from the registered sanitarian community concerned that they are being told by some AA's they are no longer allowed to design treatment systems treating stronger influent. We believe this is in error. This is a shift from what has been understood and interpreted by most everyone in the industry. We would like to discuss these issues at you first opportunity.

Additional Education Opportunities

Online Learning Academy – Did you know, TOWA offers online courses for CEUs, including High Strength Wastewater Courses. Please visit txowa.org to explore this new option to get the education you need!

Upcoming Courses

Basic Maintenance Provider Course. Held in San Marcos, TX

March 6-7, 2025
April 14-15, 2025
May 19-20, 2025
June 27-28, 2025

August 22-23, 2025
September 12-13, 2025
October 7-8, 2025
December 5-6, 2025

Advance Maintenance Provider Courses

March 17-18, 2025 – held in conjunction with the Annual Conference in Galveston, TX)
May 8-9, 2025 – San Marcos
July 8-9, 2025 – San Marcos
November 21-22, 2025 – San Marcos

High Strength Wastewater Course – March 17-18, 2025 (held in conjunction with the Annual Conference in Galveston, TX)

TOWA 2024 SCHOLARSHIP WINNERS

TOWA SCHOLARSHIPS ARE OPEN TO ALL MEMBERS. TAKE ADVANTAGE OF THIS SUPPORT!

Applications for TOWA scholarships available online or at registration desk.

2025 scholarships will be awarded June 2025.

Please join with us in congratulating the winners of TOWA Scholarships!



Suchecky Scholarship - \$5000

KASE WEISHUHN

Home: Columbus, Texas
Attending: Texas A&M University
TOWA MEMBER: Father
James Weishuhn



General Scholarship - \$2500

VIVIAN CARPENTER

Home: Benbrook, Texas
University Undecided
Mother Aimee Rockhill-Carpenter

General Scholarship - \$2500

LAUREN JOHNSON

Home: Austin, Texas
Attending: St. Mary's University
Father John Johnson



General Scholarship - \$4000

EMILY THREET

Home: Florence, Texas
Attending: Baylor University
Father Jessie Threet

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Convention Center**

