

**Advisory Opinion
From the
Technical Review Committee
For the
New England Interstate Regulatory Cooperation Project**

Product/Technology Name:

Presby Maze

Applicants Name & Address:

David W. Presby
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NEI Category:

2 – System Modification

Date of Opinion:

April 29, 1998

Project Background:

The New England Interstate Water Pollution Control Commission (NEIWPCC) in cooperation with the New England Governors Conference (NEG), EPA Center for Environmental Industry and Technology (CEIT), EPA's National Small Flows Clearinghouse (NSFC), and the New England state environmental/health agencies responsible for the administration of on-site wastewater treatment systems are undertaking a 12-month pilot project for the regional voluntary evaluation of innovative/alternative on-site wastewater products/technologies. The goal of the project is to facilitate the technical evaluation of innovative/alternative (I/A) on-site wastewater products/ technologies on a regional basis. This effort should help expedite the acceptance of innovative/alternative on-site wastewater treatment products/technologies. The work will be carried out by a Technical Review Committee (the Committee) which will conduct independent evaluations of product/technology performance. The Committee, made up of New England state regulators and advisors, will assess each product/technology on its merits, backed by quality data, and render an Advisory Opinion. The benefit of the Committee is to assist regulators in carrying out their responsibilities for evaluating these technologies in a more efficient manner.

The Committee has defined three categories of On-site I/A technologies:

1. **Material Replacement**
2. **System Modification**
3. **Advanced Wastewater Treatment**

Applicant's Description of Product/Technology:

The Presby Maze is a patented product that can be inserted inside most standard concrete septic tanks ranging in size from 1250 to 3000 gallons. It is made of PVC plastic pipe, high-density plastic mesh, and heavy sheet plastic. No modification to a standard system is required to use the Maze.

The Presby Maze is more of an addition than a replacement. The Maze enables the septic tank to contain more suspended solids from escaping to the leach area. These solids, that neither sink nor float, can exit the septic tank and clog the receiving soil.

Technology Claim(s):

The above-mentioned applicant submitted the following Claims of product performance with the formal submittal. The applicant was seeking the Committee's validation of these claims as part of the product/technology's consideration for regional evaluation in the Advisory Opinion:

Claim 1: The Presby Maze enables a standard septic tank to hold a greater percentage of suspended solids than the same tank without a Maze installed. When installed in a primary tank, the percentage of suspended solids is approximately 75% of the solids entering the tank. When installed in a secondary tank, the percentage of suspended solids retained is approximately 50%.

Claim 2: The Presby Maze allows for the use of smaller leachfields because the effluent entering the leachfield has a smaller percentage of solids, and therefore has less tendency to clog the receiving layer of the leachfield.

General Observations/Concerns:

After thoroughly evaluating all of the available information, the Technical Review Committee has identified the following concerns that may affect the approval of said technology in a state:

- 1. The technology/product does not appear to have any adverse effects on the performance of the overall system.*
- 2. The product/technology may require a higher degree of maintenance than a conventional septic tank.*

Recommendations:

Based on the Technical Review Committee's evaluation, the Committee recommends the following items to improve or insure system performance:

- 1. The Committee encourages the applicant to continue gathering additional monitoring and/or performance data for existing or new installations for influent and effluent comparisons to substantiate Claim 1. The Committee is willing to assist the applicant with the design of a sampling/monitoring protocol.*
- 2. The Committee encourages the applicant to participate in further tests of the product/technology at regional Third-Party testing centers.*
- 3. The product should be installed and operated in accordance with manufacturer's directions.*

State Regulations:

A positive Advisory Opinion shall in no way be considered a substitute for compliance with individual state regulations. Every state's regulations are designed to reflect the concerns of that state. Information generated in this opinion is intended to alleviate the investigative work required by an individual state for the consideration of said technology for approval as an alternative/innovative

technology. Before state approval of the technology, the technology must comply with all pertinent state regulations. The Technical Review Committee also recommends that each state have a control for insuring that the above-listed concerns are met, addressed, or closely monitored and tracked.

Technical Review Committee's Response to Claims:

The Technical Review Committee's opinion is based on the Committee's evaluation of available information on the product/technology and relates to the specific products, materials, and specifications stated in the Technology Claim(s) of performance.

- The Committee is unable to make a determination on performance Claim 1 based on the limited information submitted for the product/technology. The Committee reached this decision via a unanimous vote.

- The Committee can not issue an opinion on the applicant's above-stated performance Claim 2 for the product/technology. Claim 2 relates to state specific regulations, which this Committee does not have the authority to determine.

The applicant should request a determination from the committee for any modifications to the product/technology. The product/technology is also evaluated for the quality of the data, wastewater science, and the technology's apparent merit as an innovative/alternative on-site wastewater treatment technology.

The NEIWPC Technical Review Committee has endorsed this Advisory Opinion for the *Presby Maze* herewith on this 29th day of April 1998.