



March 30, 2011

**Ms. Denise K. Evans**

Director  
Ministry of Municipal Affairs & Housing  
Building & Development Branch  
777 Bay Street, 2<sup>nd</sup> Floor  
Toronto, Ontario  
M5G 2E5

**Re: Proposed MMAH Onsite Sewage System Code Changes**

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Dear Ms. Evans,

Our office has completed a detailed review of the MMAH 2011 proposed On-Site Sewage System Code Changes and I am pleased to submit our review comments.

I am very pleased that the MMAH has moved forward with serious amendments to Part 8 of the OBC, to both modernize design practices that are standard in many other provinces, and ensure that greater emphasis is placed on protecting the environment and the general public.

As you and I have discussed this past year, there are many problems within the On-Site Sewage system portion of the code. The biggest problems, in my opinion, have been poor performing tertiary treatment units (based on earlier NSF testing), and the whole Area Bed issue that undoubtedly taken a considerable amount of your department's time.

In addition, the Part 8 code is outdated, and has not taken into account recognized industry standards that are now utilized in many Provinces and US states; including; soil / texture classifications, 'Tyler' Tables, linear loading rates, pressurized distribution, nutrient reduction including disinfection, service & maintenance for all sewage systems, and use of advanced treatment systems in areas of both source water & general water protection.

The initiative to adopt the new CAN/BNQ and CSA B481 standards are excellent. My thoughts, which are detailed in my review comments, are that the sunset date for CAN/BNQ certification should be Dec 2014 (versus 2016), if we are serious about environmental protection of our waters.

Although I am in full support that Area Beds should be brought into the code, I am not in agreement with all of the proposed code provisions. Now that we are introducing disinfection categories, in my opinion there should be different vertical separation distances to the groundwater depending on the disinfection performance of the treatment

unit. I do not believe that QT/400 is the correct loading rate for all treatment systems. Based on treatment performances, including nutrient reduction, higher loading rates would be acceptable. For a pressurized distribution within Area Beds, I believe that QT/600 would be more than appropriate. I believe that treatment systems, with appropriate dispersal fields, will be the key to our future environmental protection. We need to build in requirements that will give manufacturers a financial incentive to build better treatment systems that will intimately improve protection to both our environment and the public.

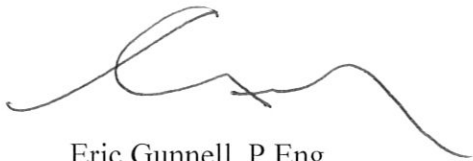
The maintenance requirements for sewage systems does not go far enough, as I believe that all sewage systems, both conventional and treatment systems, should have regular service and maintenance for improved protection to both the environment and the public.

I agree that it is an excellent idea that you are proposing, where a sewage system is materially altered, to ensure compliance with the 900mm vertical separation to the high water level, but what about the existing 1,000s and 1,000s of on-site sewage systems that have deficient vertical clearances and are clearly polluting our water resources?

Our on-site sewage comments, on the prescribed forms, are attached.

I look forward to participating with the MMAH in your process to complete this initiative for proposed on-site sewage code changes. This will be a major advancement for our industry.

Yours truly,

A handwritten signature in black ink, appearing to read 'Eric Gunnell', with a long, sweeping underline that extends to the right.

Eric Gunnell, P.Eng

Encl.

c.c. Alek Antoniuk, Nicole Niedra & Ahmed Sharaf