



# Oregon

Theodore R. Kulongoski, Governor

## Department of Environmental Quality

811 SW Sixth Avenue  
Portland, OR 97204-1390  
503-229-5696  
TTY 503-229-6993

October 24, 2005

Bennette Burkes  
Consolidated Treatment Systems, Inc.  
1501 Commerce Center Drive  
Franklin, OH 45005

Re: Consolidated Treatment Systems, Inc. ENVIRO-GUARD™ Alternative Treatment Technology

Dear Mr. Burkes:

The Oregon Department of Environmental Quality (Department) has evaluated your application for approval as an Alternative Treatment Technology (ATT) in Oregon. In the application, your company has certified that the ATT systems manufactured by your company will comply with all applicable Department rules and regulations. Furthermore, the Department has reviewed your application materials for compatibility with the standards and criteria found in Oregon Administrative Rule (OAR) 340-071-0345. I am pleased to advise you that the following ATT system has been found to meet the approval criteria for Treatment Standard 1 when used as part of an onsite wastewater treatment system in Oregon:

➤ **ENVIRO-GUARD™ Treatment Unit Model ENV-0.75 (750 gpd)**

You are authorized to manufacture, market, and distribute these ATTs for use in Oregon, providing the following conditions are met:

1. The ATT must be manufactured in compliance with the Department's rules, and with the plans and design specifications provided. Any deviation from the plans and specifications shall not be permitted unless authorized by NSF and in writing by the Department.

The approved plans are labeled Version 1.0 and dated 10/20/05 (attached).

2. In the event of air compressor failure, the control panel shall lock out effluent pump operation to prevent untreated or partially treated effluent from discharging to the disposal area. An audible and visible alarm shall activate in the event of either pump or air compressor failure.
3. The ATT must be preceded by a septic tank or dosing septic tank approved for such use in Oregon if the projected daily flow into the system is greater than 500 gpd.
4. The manufacturer must provide training for, and maintain a list of, certified installers and maintenance providers authorized to work on these ATTs, and provide certificates to those individuals.

5. Systems less than 10 years old may not exceed a failure rate of 10 percent.
6. Each ATT must maintain NSF Standard 40 certification.
7. As the manufacturer of these products, it is your responsibility to assure that each assembled ATT delivered to the construction site is watertight. Assurance must be achieved by periodic testing of the ATT products for water-tightness at the manufacturing facility.
8. A minimum two-year service contract, including a minimum of four service visits (scheduled every six months) must be included in the purchase price of the ATT.
9. Each ATT shall be delivered with an installation guide and owner's manual.
10. Each ATT is only acceptable for use at locations where the top loading will not exceed the engineering design parameters. ATTs proposed for use at other locations must have an engineering analysis of the potential top loading, and may require the preparation of site-specific plans and specifications.

Please feel free to contact Uri Papish at (541) 229-5013 if you have any questions about this letter.

Sincerely,



Mark Cullington, Manager  
Water Quality Division

cc: All Contract County Offices  
All DEQ Direct Service Offices  
Uri Papish, DEQ HQ