

Brian Baumgaertel

Small correction, in the Executive Summary pg xii and again on pg 5-16, the number of I/A systems is cited as more than 1,500. This number is actually north of 1,700.

The link on pg 3-34 has changed to <https://septic.barnstablecountyhealth.org/category/data-and-statistics>

Also, I am a little confused as to the purpose of drawing a distinction between I/A Systems and "Enhanced" I/A Systems. There is no difference whatsoever between a FAST unit installed under "General" approval and a FAST unit installed under "General" approval with a nitrogen reduction credit. "Enhanced" is not in the I/A nomenclature as far as I am aware, and I don't think the 208 plan is a place to introduce new terminology. It only serves to confuse. The reader would be better served by knowing that certain I/A technologies have a nitrogen reduction credit which is due to demonstrated performance by that technology in removing nitrogen. They are not "enhanced".

Brian Baumgaertel

On page 3-33 you cite "enhanced" I/A systems as being approved by DEP for 13 mg/l. This is false.

FAST Approval

<http://www.mass.gov/eea/docs/dep/water/wastewater/w-thru-z/w101238.pdf>

Page 2, Section I.3 - "Effluent Total Nitrogen (TN) concentration of 19 mg/L (for 660 gallons per day per acre -gpda- loading) or 25 mg/L (for 550 gpda loading)."

RUCK approval

<http://www.mass.gov/eea/docs/dep/water/wastewater/w-thru-z/w152782.pdf>

Page 2, section I.4 "Effluent Total Nitrogen (TN) concentration of 19 mg/L (for 660 gallons per day per acre -gpda- loading) or 25 mg/L (for 550 gpda loading)."

RSF Approval

<http://www.mass.gov/eea/docs/dep/water/wastewater/o-thru-v/rsf9908.pdf>

Page 2 Section I.4 "...total

nitrogen of 25 mg/L..."

In NO instance is 13 mg/l TN used as an effluent discharge standard for I/A systems with nitrogen reduction credit.

Brian Baumgaertel

Page 3-33, link is incorrect.

<http://www.mass.gov/eea/agencies/massdep/water/wastewater/septic-systems-title-5.html#5>

I/A information is at anchor #5, not #1 as indicated in your report.

Brian Baumgaertel

On Pg 3-35 you cite the following on the two tables presented:

Comparison of Costs for Wastewater Management Systems Applicable to Cape Cod, 2014

This report as "updated" does not exist outside of the appendix of the 208 report, based on a simple Google search. In essence, you are referring to a report which was created ("updated") for the express purpose of supporting another report.

What you should have done was leave the original 2010 report alone and written a new report indicating what has changed, so that a reader does not get the false impression that the "updated" material carries the same legitimacy of the original.

This is just plain bad practice.