

**commentletters - FW: California Approvals**

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**From:** Robert Rawson <iws@sonic.net>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** 4/2/2012 1:15 AM  
**Subject:** FW: California Approvals  
**Attachments:** Alameda County IOS-500 Letter.pdf; Arkansas White Knight Approval.pdf; Delaware WK Approval 06.pdf; Florida IOS-500 Approval 4-12-02.pdf; Florida WK Acceptance 8-24-05.pdf; IOS-500 Florida Compliance Letter.pdf; MA Approval, 12-22-10.pdf; Maine Acceptance 7-14-04.pdf; New Hampshire WK Acceptance, 3-31-03,.pdf; New Jersey WK Letter of No Objection, 6-16-03.pdf; NYCDEP 8-02 White Knight Letter.pdf; NYS DOH White Knight Letter 6-07.pdf; RI DEM White Knight Approval 2008.pdf; South Carolina WK Letter of No Objection, 9-13-04.pdf; Virginia GMP 122 WK Listing, 9-22-03.pdf; WI White Knight Remedial Acceptance 20080513.pdf; WI White Knight Sewage TreatmentApparatus Acceptance 201000070.pdf; WI WK-150 & 200 Dept of Commerce Acceptance Drawing.pdf; WI WK-150 & 200 Dept of Commerce Acceptance.pdf

**# 002**

**International Wastewater Solutions Corporation**  
P.O. Box 157, Sebastopol, Ca. 95473  
[iws@sonic.net](mailto:iws@sonic.net) (707) 829-31190

Dear Sir,

I am the President of International Wastewater Solutions Corporation and the author of Patent **7,658,851 "White Knight" as well as the co-inventor** of the Pirana ABS Patent. Both of these devices and patent methods are pertinent to OWTS and AB-885 implementation. From this perspective I wish to comment on the proposed **"POLICY FOR SITING, DESIGN, OPERATION AND MANAGEMENT OF ONSITE WASTEWATER TREATMENT SYSTEMS (OWTS) – Septic Systems"** I may also wish to reserve time to speak on this issue if this file is not deemed adequate to achieve acceptance. I have attached information identifying some of the other states in the United States that have approved the White Knight Aerobic Microbial Inoculator device. I will send additional documents in a separate email to supplement this list. The White Knight Aerobic Bacterial Generator inoculator system is used in many states to remediate failed leach fields or treat water in sensitive water systems or remediate grease impacted systems such as McDonalds or Dunkin Donuts sites in Massachusetts and other east coast states. It has been around more than 10 years and has an established track record. Some states including: Wisconsin, and Maine, provide a credit for decreased size of leach field, and or reduced distance separation to ground water for new construction, and it is commonly used in existing failing systems..

In reading the latest draft of the policy implementing AB-885 I notice that Tier 3 10.65 mentions IAPMO. Having had a very negative experience with IAPMO the details of such discussions having lead me to believe that their certification was for sale, I chose not to have IAPMO review my product. It is not the state's job to anoint private firms with the franking privilege and act as a gateway to obtaining access to interstate markets. While we are now in negotiations with NSF to obtain a new category of certification we still feel that the use of such criteria is inappropriate and unfair to consumers and to engineers who are licensed and trained to specify appropriate equipment for specific site conditions.

I am concerned that relying on IAPMO without evaluating other measures of performance such as those I have attached in this email correspondence, might result in a restraint of interstate trade by preventing a California consumer from utilizing a White Knight device manufactured in New York, to restore their system, or protect groundwater, or reduce nitrogen to acceptable levels.

I am requesting that the State Board review the information submitted and create no restriction on the use of White Knight in any tier of treatment. Since the White Knight is not only the least costly approach to enhanced treatment and soil restoration but also one of the most effective methods, I am requesting that the State incorporate no restriction on the use of this technology via AB-885 that would not now apply.

Sincerely,  
Bob Rawson  
President IWS, Corporation  
Cell (707) 318-7001

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**From:** Mark C Noga [mailto:mark@knighttreatmentsystems.com]  
**Sent:** Friday, March 30, 2012 5:02 AM  
**To:** 'Robert Rawson'  
**Cc:** 'Bob Rice'; 'Frank Rice'; 'Chuck Waddy'; sandy@septics.com  
**Subject:** RE: California Approvals

Bobby,

I've attached all the regulatory letters of either acceptance or no objection that exists at the moment. I've also included the last edition of the WK Design, Installation, Operation and Maintenance Manual in case you think it would be beneficial.

Let me know if there is anything else I can assist with.

Mark

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**From:** Robert Rawson [mailto:iws@sonic.net]  
**Sent:** Thursday, March 29, 2012 8:56 PM  
**To:** 'Mark C Noga'  
**Cc:** 'Bob Rice'; 'Frank Rice'; 'Chuck Waddy'; sandy@septics.com  
**Subject:** California Approvals

Mark,

Do you have a complete document packet with all of the White Knight approvals we have for every state? I would like to submit this to the California State Water Resources Control Board at their Policy for siting, Design, Operation and Management of onsite Wastewater Treatment Systems (OWTS)- Septic Systems comment period ending on April 2<sup>nd</sup>. They are setting policy on what will be allowed in California. I want White Knight and perhaps KNURD to be included. This will tie in with SB885 and could be very important.

Thanks,  
Bob Rawson