

June 28, 2011

MEMO:

Subject: Roth RMT Rhode Island Sales Introduction- July 1, 2011

Rhode Island Department of Environmental Management has issued draft rule changes that will allow the RMT to be sold and installed in Rhode Island for the first time. The issue has always been a 48.00" liquid level requirement that we have never successfully circumvented. The draft rule revisions now include a 39.00" liquid level requirement that we do comply with.

Product Approval:

Rhode Island does not have a Septic Tank review and approval process or a registration program as found for example in Florida, Massachusetts or North Carolina. Similar to Pennsylvania, product acceptance is a matter of compliance. To paraphrase: "if your tank meets the design and construction standards put forth in the rules, you may sell and install your product in the state of _____". If at any point it is determined that the product is not compliant, sales and installations shall cease." As this is the case, Rhode Island will not issue "approval letters" or "compliance letters" or as far as we are aware, list "acceptable" tanks/tank manufacturers.

Draft Rules:

Attached are excerpts from the draft rules concerning grease tank, septic tank, holding tank and pump tank design and construction. They define what we can sell as follows:

Rule 25 Grease Tanks-

- Grease Interceptor- Minimum capacity- 1000 Gal.
- Outlet Tee extended to 12.00" from tank bottom
- Maximum two tanks in series are allowed if combined volume meets/exceeds 1000 Gal min capacity.

As in every jurisdiction, local municipal codes must be checked to insure compliance with local Grease Interceptor design requirements as they may differ and be more restrictive than the State Rules. Installation in traffic areas and high groundwater conditions must also be considered.

Rule 26 Septic Tanks-

- Residential- Bedroom based prescriptive capacity- 1000 Gal. minimum
- Non-residential- 2X daily design flow or 1000 Gal. whichever is greater
- All fiberglass and polyethylene septic tanks larger than 1000 gallons installed in FEMA designated V-zones (coastal velocity zones) shall be anchored to prevent flotation.**
- We will request current V-zone maps from RI and FEMA to provide guidance on this. Statistics found on the web indicate that there about 8600 RI households currently in V-zones. Installation instructions for HGW and the restraining collar detail should be on file at every wholesaler and a focus of installer certification training in RI.
- Agency Certification- IAPMO/ANSI Z1000-2007 compliance required
- Two compartment tanks are required, excepting tanks in series.
- Effluent filters are required.
- Inlet/Outlet- our standard plumbing kit with 4" long radius inlet fitting and Tuftite outlet tee applies.

Rules 28 & 29- Holding and Pump Tanks

-Our standard single compartment tanks will be suitable for these applications based on installing them per the rules.

Tank Packaging for Rhode Island:

Attached are the insert pages for the plant packaging manual. We will use the same compartment divider configuration as is used in Connecticut as we suspect that there will be some "migration" of inventory from CT wholesalers over the state line into RI. The standard Mass Title 5 tank configuration meets the RI requirements as well.

Sell List for Rhode Island-

Grease Tanks-

RMT 500-1P thru RMT 1500-1P (extended outlet baffle to be furnished by wholesaler/contractor)

Septic Tanks-

RMT-500-1P Tanks in Series

RMT-750-1P Tanks in Series

RMT-1000E-2P

RMT-1060-2P

RMT-1250-2P

RMT-1500-2P

4" Effluent Filter PN- EF-4

Holding and Pump tanks

RMT-300 thru RMT-1500

Risers and lids

Note- RMT-300 is not excluded from grease tank or septic tank "tanks in series", just not practical due to small volume.