

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

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Commissioner



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Governor

DPH Environmental Engineering Program **October 25, 2012 Code Advisory Committee (CAC) Meeting**

Meeting Sign-in and CAC Member Representation Changes & Updates

- CADH: Rob Miller (EHHD DOH) leaving CAC, Maura Esposito (Killingworth DOH) joining CAC
- CEHA: 2013 Soils Training Workshop
- COWRA
- CT HBA
- DEEP: Update on the new General Permit for Existing Facilities
- Professional Engineers (CEPP, CSPE, CSCE)
- Soil Scientists
- CT Association of WPCAs (Invited to join CAC, no response yet)

National Decentralized Sewage System Publications

- **EPA Decentralized Wastewater MOU Partnership Position Papers:** EPA Decentralized Wastewater Memorandum of Understanding (MOU) Partnership published 4 position papers on decentralized wastewater management and systems, and the MOU papers are available via the following link on EPA's Web page:
<http://water.epa.gov/infrastructure/septic/Decentralized-MOU-Partnership-Products.cfm>
Approved MOU position papers distribution plan and outreach text attached.
- **SORA Sustainability White Paper:** State Onsite Regulatory Alliance (SORA) published a white paper (attached) on decentralized onsite wastewater technologies that are sustainable green infrastructure. SORA also published a white paper on decentralized system funding, which was updated May 16, 2011 and was previously distributed to CAC, and is on the SORA website and the program's web site.
- **EPA Smart Growth Document for Rural Areas:** In March 2012 EPA published a document entitled Essential Smart Growth Fixes for Rural Planning, Zoning, and Development Codes, which is available at: http://www.epa.gov/dced/pdf/rural_essential_fixes_508_030612.pdf

CT Nonpoint Source Pollution Matters

- **Phosphorous:** Section 1 of Public Act No. 12-155 (An Act Concerning Phosphorous Reduction in State Waters) requires DEEP to evaluate and make recommendations regarding a state-wide strategy to reduce phosphorous loading in inland non-tidal waters. Phosphorus nonpoint source pollution will be included in the evaluation and decentralized/onsite sewage systems are one of several nonpoint sources of pollution. Decentralized sewage systems discharge phosphorus to the ground waters of the state and contribute to phosphorus loading of inland waters. DEEP has announced two initial meetings (attachment) to discuss the requirements of the legislation. The topic of the first meeting (11/28/12) is the state-wide response to address phosphorous nonpoint source pollution.



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- **Bacteria TMDL:** The Environmental Engineering Program provided the attached August 2, 2012 comments to DEEP on their draft document entitled *A Statewide Total Maximum Daily Load Analysis for Bacteria Impaired Waters* dated June 26, 2012. DEEP responded with the attached September 24, 2012 letter that includes a link to their web page, which includes other comments, responses to comments, and the final TMDL that has been approved by EPA.

Conservation and Development Plan

- **Public Draft of the 2013 – 2018 Conservation and Development Policies: A Plan for Connecticut.** This item was on previous CAC meeting agenda. DPH provided the attached October 9, 2012 comments to the Office of Policy and Management on the public draft.

Pending Product Reviews and Approvals

- Orenco Systems, Inc. (OSI): OSI's Biotube Junior effluent filter to be added to the list of approved effluent filters (Appendix B). OSI has requested approval of their pre-packaged Biotube Pump Vault for use in combination septic tank/pump chamber applications and has requested a code deviation that would allow for liquid level drawdown in both compartments.
- Cur-Tech High Invert Proprietary Leaching System: Alternative leaching system piping configuration raises invert height that results in higher ELA credits.
- American Manufacturing Company (AMC), Inc. Perc Rite Drip Dispersal Systems: Approval for this proprietary drip dispersal/dosing system is pending.

Sewage System Cleaner & Installer Enforcement Matters

- DPH has investigated numerous complaints over the last several years against both licensed and non-licensed individuals involved with subsurface sewage system installation and cleaning. Cases against un-licensed individuals have been settled by execution of cease and desist Consent Order agreements. One individual with a suspended license has had his installer's license revoked. Other cases have been settled with Consent Order agreements, which included civil penalties. Internal DPH administrative protocols being reviewed after two individuals improperly had licenses transferred.
- DPH issued Circular Letter #2009-66 in October of 2009 on the subject of installer license verification, and another Circular Letter is being considered for license verification for individuals involved with septic system cleaning. Licensed installers and cleaners can legally perform this task, and assistance from sewage treatment plants/WPCAs may be requested to ensure individuals disposing septage at their facilities are properly licensed. Related issues: Individuals pumping/transporting F.O.G. from food service establishments on public sewers don't need a DPH installer or cleaner license.

Leaching System Effective Leaching Area (ELA) Ratings

- Correspondence concerning ELA rating protocols to be sent to concrete pre-casters, proprietary leaching system companies, and entities that previously provided DPH comments on ELA rating matters. The CAC will be copied on the correspondence and it will be posted on DPH's web site. ELA rating changes to become effective with the next revision of the Technical Standards.
- The agenda for the previous CAC meeting held in June of 2012 cited the following preliminary ELA rating protocol changes:
 1. The sidewall and internal interface credit height will be raised the from pipe invert to the 3/4 point up the pipe.
 2. Competing bio-mats less than 1/2 inch apart will not receive any credit, and competing bio-mats between 1/2 inch and 2 inches apart will receive 50% credit.
 3. Internal interface credits will be limited based on the bottom sand area available for internal loading.

- DPH is preparing an excel spreadsheet that is intended to show how the preliminary changes will impact the ELA credits for the currently approved leaching systems, and how various limits established for above item 3 will impact ELA ratings.

Revisions to the *Technical Standards for Subsurface Sewage Disposal Systems* (Technical Standards)

- Revisions to the Technical Standards anticipated to be published on January 1, 2014.
- Storm water infiltration systems: Include special provision for reduction of minimum separation distances to relatively minor storm water infiltration systems such as rain gardens.
- ELA credit rating changes for leaching systems to be made.
- Possible reduction of minimum separation distances for buildings or portions of buildings on piers.
- Re-evaluate minimum separation distances to closed loop geo-thermal wells (Related to pending DCP draft regulations.
- Minimum storage triggers for timed dosing of leaching systems possible.
- Items on previous CAC meeting agenda for potential revisions that are still be considered: establish 1-bedroom residential building sizing for secondary 1-bedroom residential buildings (in-law apartment, guest house) on single-family residential building sites, eliminate reserve area requirements for outbuildings on single-family residential building sites, modify sizing for septic systems serving multi-family residential buildings with multi 1-bedroom units.