

SSDS (< 5,000 GPD) Management Action Item & Initiative List

1. Certification, Training & Licensure

Health Agent Certificate Renewals (CEUs?) & Disciplinary Action: PHC Regulation Revisions
Mandatory Field Component for New Health Agents & Recertified Agents
CGS Revisions: Installers: Clarify Language about “Regularly” Offering Services to the Public
Possibly Expand to Include SSDS Inspections for House Sales
Cleaners: Include Pumping of Non-Discharging Sewage Systems: HTs & Privies
Sanitarian Oversight Requirements for CGS Sec 19a-200b, & CEUs for Renewals
Photo IDs for Installers & Cleaners

2. Site Investigations

Field Training Standardization for Professional Engineers & Health Agents
\$ to Secure On-Going Field Training
PE Supervision of Non-PE Staff

3. Performance

Pollutant Renovation Criteria: Bacteria Travel Time, Nitrogen/Density Concerns, TMDLs
On-Site Treatment: Relying on Off-Site Renovation, Groundwater WQ Monitoring

4. Technical Standards/Design Considerations

Leaching Systems: 3rd Party Testing for New Systems, ELA Crediting Criteria & Storage Requirements
Application Rates/Wastewater Strengths, Pollutant Loading, Mounding/Hydraulic Analyses, Load Tests
Large Systems (2-5 K GPD) Vs Small Systems on 2-5 K GPD Sites: Generate/Re-Issue Guidance
Multi-Lot Development for DEP Avoidance: MA type Disaggregation Regulations

5. Inspections & Monitoring

Statewide Management Vs Forced Management to Address Community Pollution Abatement Orders
Decentralized Wastewater Management Districts: Engineering Report Requirements, Remediation Stds.
Real Estate Transaction Inspection Protocol/Possible Requirements
Permit to Discharge: Renewals (5 Year Permits) & Transfer at Time of Sale
Pump-out Permits
Local Management Ordinances, Model Ordinance

6. Record Keeping, Inventory & Reporting

Web-Based Tracking System
Monthly Exception Reporting to DPH
Malfunctioning & Failed System Reporting
Local Health Department Audits for Regulation Administrative Compliance

7. Enforcement/Corrective Actions

UIC Class V Injection Wells: Federal Rule: Elimination of Large Capacity Cesspools by April 2005
Restitution for Property Owners: PA 08-137, Section 3, Eff. 10/1/08
Fines & Appeals
Unlicensed Individuals
Tiered Violation Criteria/Enforcement Action Standardization

8. Operation & Maintenance

Illegal Connections: Softener/Other Water Treatment Wastewaters & Non-Domestic Sewage Additives
Pharmaceuticals
Riser Retrofits
Management Manual

9. Financial Assistance & Funding

Secure Funding for Decentralized Sewage System Initiatives (i.e., Soil Workshops): SRF, LIS Grants
Funding for Pro-Active Management
Decentralized Sewage System Management Prioritization
SORA Inclusion in MOU between EPA & Partner Organization: August 2008

10. Education & Participation

Continuing Education for Sanitarians and/or Health Agents, Installers
CAC Representation: Formalize PE Organization Representation. DEP (On-Site & Municipal Facilities)
Independent Scientific Research on Decentralized Wastewater Issues
Outreach to: WPCAs, Realtors, Educators, Planners, and Zoning Officials on Germane Matters
SSDS Use Guidance & Brochures
COWRA Installer & Cleaner Exam Preparation Courses
Web-Page Upgrades
Design Manual Revisions (Last Revised July 1998)

11. Planning & Land Use Controls (B100a)

PHC Reg (B100a) Revisions: Residential Bldg Additions: Eliminate 50% ELA & MLSS Provisions, and Address Off-Site Well Arcs for Conceptual Layouts: Secure Development Rights or Require Installation (PA 08-137, Sec 1 Affects Water Company Wells with Off-Site Well Arcs)
“Sensible Growth” Land Use Development: Cluster & Conservation Projects
Shared Water & Wastewater Systems Vs Individual Systems
Encourage OPM’s Office of Responsible Growth Participation & Engage Educators (NEMO/CLEAR, NRCS) & Land Use Commissions (Planners, Zoning Officials) in Sensible Growth Initiatives
Sewer Need Assessments & Induced Growth Funding Restrictions

12. Residuals

FOG Disposal: Limited Available Facilities, Municipal Responsibilities
Coordination w/ WPCAs on Septage Disposal: Pump-out Info, Notifications

13. Construction

Standard Operating Procedures: Fill Placement/Compaction, Weather Restrictions
Best Management Practices: E & S
Construction Guidelines

Note: Draft document prepared for discussion at 7/9/08 CAC Mtg. Numbered SSDS (Subsurface Sewage Disposal System) Management Components Based on EPA Management Guidance Modified for CT.