



STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH

DPH Environmental Engineering Program

October 28, 2010 Code Advisory Committee (CAC) Meeting

Attendance & CAC Member Updates

- CADH
- CEHA
- COWRA
- CT HBA
- DEP
- Professional Engineers (CEPP, CSPE, CSCE)
- Soil Scientist: New member, Richard (Rick) Zulick representing Society of Soil Scientists of Southern New England (SSSSNE)

Legislative Matters

- Public Act No. 10-158: In accordance with the legislation, DEP submitted a report to the Governor and General Assembly that includes an analysis of DEP's permit timeframes for their 25 permit programs, one of which is their Groundwater Discharge Permitting Program (GDPP) for domestic sewage discharges. The full report (192 pages) is available on DEP's website, and a copy of the GDPP portion (9 pages) of the report is attached.

DEP Lean Project/Draft General Permit

- Draft *General Permit to Discharge from Subsurface Sewage Disposal Systems Serving Existing Facilities*: DEP provided DPH a revised draft General Permit (GP), and an electronic copy dated 10/22/10 was distributed to the CAC on October 25, 2010. Comments should be submitted ASAP to DEP as they anticipate going to formal public notice in the near future. Following the adoption of the GP, DPH will rescind Circular Letter # 2002-24 dated June 12, 2002, and DPH will, with consultation with DEP, issue an updated Circular Letter about the role of local health departments with B100a type activities on DEP jurisdiction sites.

Old Saybrook Decentralized Wastewater Management District

- WPCA is pursuing amendments to the town's Upgrade Standards that will include more stringent septic tank and piping requirements. In accordance with town ordinance, the Local Director of Health, DEP and DPH must approve the amendments. DPH will circulate proposed amendments to CAC, tank manufacturers (Concrete Pre-casters & Plastic Tank Companies), and other interested parties, and DPH will solicit feedback.

State Onsite Regulators Alliance (SORA) Comments to EPA, & EPA Webcast on SRF \$ for Decentralized Projects

- EPA distributed a Draft Strategy for Clean Water in August of 2010, and they invited public comment. The 9-page document didn't specifically mention decentralized sewage systems, and there was no discussion about the funding barriers for these systems. SORA sent comments to EPA about the lack of focus on the decentralized area. DPH (A. Clark) & DEP (D. Greci) participated in an October 21, 2010 webcast on the issue of "Funding Decentralized Wastewater Projects with State Revolving Funds". The webcast highlighted how the State of Ohio secured \$3.3 million in funding for decentralized projects through the Green Project Reserve provision of the Clean Water Act's State Revolving Fund.

DPH Grant Application

- The application DPH submitted for a CDC grant that would have provided a septic system management and tracking system has been denied.

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Two-Inch Nominal Tire Chip Aggregate

- DEP's permit to distribute such aggregate in CT has expired on September 30, 2010, and the permittee failed to submit test data to DEP and DPH for the past two years. Notice to be issued that until further notice such aggregate cannot be utilized in SSDS construction in CT.

Effective Leaching Area Credit Discussion

- DPH issued January 4, 2010 letter to proprietary leaching system manufacturers and certified concrete pre-casters noting that DPH will be reconvening our CAC to begin discussions on revisions to the Technical Standards and one of the items up for discussion is effective leaching area credit ratings, and DPH noted written comments could be submitted. Several proprietary companies and the Northeast Precast Concrete Association submitted written comments that have distributed to the CAC. DPH issued a September 30, 2010 letter to proprietary leaching system manufacturers and certified concrete pre-casters noting that they will be given the opportunity to attend the October 28, 2010 CAC meeting and participate in the discussions on leaching system ratings. DPH distributed several other reports/documents on wastewater loading matters to the CAC and those documents will be posted on the program website.

Summary of proposed revisions to the Technical Standards for Subsurface Sewage Disposal Systems

- **Section I Definitions:** None
- **Section II Location of SSDSs:**
 - Stipulate separating distances are measured horizontally unless noted (See below about non-vertical boreholes).
 - Provide language in "special provisions" under Item A (Water Supply Wells, Springs, Domestic Water Suction Pipes) allowing a reduced distance (25') between water suction pipes and watertight tanks if suction pipe is sleeved or approved tight pipe.
 - Table No. 1: Items F, K, O, & Q: Add note clarifying that excavations near SSDSs shall not be backfilled with "free draining material" that is coarser than surrounding material.
 - Table No. 1: Item Q (Closed Loop Geothermal Systems): Non-vertical boreholes (Many DX Systems) will be added, and minimum distance from all boreholes (vertical & non-vertical) will be: 50 feet to leaching systems, and 25 feet to watertight tanks (septic tanks, pump chambers, grease interceptor tanks). Note: Non-vertical boreholes require compliance with minimum separation distance as measured from the closest point of the borehole.
- **Section III Piping:**
 - Wording to be revised in Tables 2 and 2D to clarify that the approved piping is also for piping that is in close proximity (25' – 75') from domestic water suction pipes.
 - Table 2A to indicate that grease interceptor tanks are sources of pollution as is currently noted for pump vaults. Note may be added designating stronger pipes (ones that currently also appear in Table No. 2) that are to be used between the building and grease interceptor tank when piping is within sanitary well radius. Note: EEP is currently reviewing draft Circular Letter that may be issued by DPH's Drinking Water Section about grease interceptor tanks being installed at restaurants served by public sewers in accordance with DEP FOG General Permit.
- **Section IV Design Flows:**
 - Subsection E Management Programs: Revise wording to recommend rather than require that DPH approval be secured prior to adoption.
 - Possible new language noting no Permit to Discharge renewals for failed systems, and malfunctioning systems identified during pump-out require further assessment prior to renewal.
- **Section V Septic Tanks & Grease Interceptor Tanks:**
 - Stipulate that tanks that are below grade shall have a minimum of 6 inches of cover.
 - Current language stipulates tanks must provide a minimum detention time of 2 hours under peak flow conditions. Add statement that mathematically, the detention time is the volume of the liquid in the tank divided by the flow rate through the tank.
 - Stipulate that repairs of precast concrete structures, when required, shall be performed by the manufacturer in a manner ensuring the repaired structure conforms with ASTM C 1227.

- Stipulate effluent filters can be used in grease interceptor tanks however the manufacturer of the filter must specify suitability for this type of waste.
- Add recommendation about replacement of single compartment septic tanks, especially undersized tanks, at time of leaching system repair, and stipulate that single compartment septic tanks should only be allowed to remain if applicant has tank evaluated to confirm tank is in satisfactory condition.
- Performance testing language to correct typo (100 Vs 50 mm) under the vacuum testing protocol.
- Specify effluent filters must meet the performance criteria of NSF/AMSI Standard 46-2005 or most current revision (Per ASTM 1227-09), or provide exemption. DPH discussing w/ filter companies.
- **Section VI Effluent Distribution, Pump Systems & Air Injection Processes:**
 - Add Perc Rite Leaching/Distribution Add wording that pump(s) and electrical connection must be readily accessible from the ground surface. The piping must be attached to the pump close enough to the top of tank under the manhole to allow for servicing, and a quick-disconnect device shall be utilized to allow easy removal of the pump for maintenance.
- **Section VII Percolation Tests: None**
- **Section VIII Leaching Systems:**
 - Subsection E Proprietary Leaching Systems: Add language to that stipulates it is the responsibility of the company to ensure that installers are properly trained on installation protocols.
 - Add language that DPH can require third party/independent test data in conjunction with proprietary leaching system reviews/approvals that are deemed substantially different than those currently approved.
 - Add Perc Rite Leaching/Distribution Systems to approved proprietary leaching systems.
 - Add new Geomatrix products (GST 37 Series & GeoMat Edge U-Shape) to approved proprietary leaching systems.
 - Add new GreenLeach Filter products (Series 37) to approved proprietary leaching systems.
 - Add maximum ELA credit rating (29.9 SF/LF).
 - Internal and competing bio-mats: Credit limitations under discussion.
 - Revise language about proprietary leaching systems in vehicular travel areas to clarify that they must be H-20 load rated.
- **Section IX Groundwater, Roof, Cellar and Yard Drainage: None**
- **Section X Other Wastewater:**
 - Revise language to note that discharge of water treatment wastewater to a SSDS is prohibited unless authorized by DEP, or by DPH if deemed incidental.
- **Section XI Non-Discharging Systems: None**
- **Forms #1, 2, 3 & 4: None**
- **Appendix A, MLSS Revisions:**
 - Incorporate revised language that is posted on program's website. New systems and code-complying areas (B100a Intensification of Use: Conversions, Changes in Use) shall provide leaching system spreads meeting MLSS that utilizes natural receiving soil only. Allowances included for repairs that can't meet the new system MLSS. These non-compliant repairs have a MLSS that utilizes receiving soil that includes both natural soil and fill material. Language to be revised to indicate that the permitted flow for non-compliant repairs on the discharge permit takes into account the hydraulic capacity of this receiving soil. B100a potential repair areas identified for non-flow increasing building additions will also be allowed to consider fill for receiving soil.
- **Appendix B & Appendix C: None**
- **Appendix D, Approved Non-Concrete Septic Tanks:**
 - Update appendix to include the approved tanks based on most recent list revision (3/1/10).