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**From:** George Calkins <gcalkins@llhd.org>  
**Sent:** Tuesday, April 20, 2021 2:47 PM  
**To:** Scully, Robert <Robert.Scully@ct.gov>  
**Subject:** Sewage System Reserve Areas

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Mr. Robert Scully,

I am writing this email to ask that you consider a future Technical Standard or Code Regulation update to require that the reserve area that would be required for a new construction development be maintained for at least a minimal period of time, such as a minimum of one year or longer, after the issuance of a certificate of occupancy for such a new development. Currently, the code and technical standards allow the identified reserve area to be discontinued or ignored immediately upon issuance of a C.O. The Code would then only rely on the measures of section 19-13-B100a to maintain or provide a "code-conforming replacement area" that would include the initial system area as part of its requirement. The rationale for maintaining the reserve area for a minimal period would be at least twofold. It occasionally occurs that a newly installed sewage system prematurely fails as a result of construction errors or due to an incorrect basis of design, such as incorrect or insufficient soil test data or testing procedures. By having at least a year to evaluate system function, we know we would still have a credible "fallback" area that might be used to allow a proper new system to be installed as a repair/replacement in a new area not disturbed by prior construction, or found to be unacceptable due to unforeseen conditions. A second rationale would be to limit the immediate over-building of a development with a substandard sewage system by allowing a builder /owner to immediately apply for a greater design basis upon receiving a C.O. We currently see properties built with a level of development, have a C.O. issued and very quickly have applications submitted to increase or expand the use or basis of design without any need for expanding the sewage system to the same level of use or design. For example, someone may build a 4 or 5 bedroom dwelling with the appropriately sized system only to then apply for an addition with 2 more bedrooms without any increase in system size needed. We would have a brand new house with a totally undersized system for the accepted basis of design. The same problem might occur with non-residential development resulting in up to a 50% increase in design flow with no increase in the

operating sewage system size. This allowance seems totally contradictory to sensible sewage system design.

Thank you for any consideration that you may give to this matter. If you have any questions concerning the above, please contact me.

Very truly yours,  
George P. Calkins, R.S.