



**HOME BUILDERS &
REMODELERS
ASSOCIATION
OF CONNECTICUT, INC.**
435 Chapel Road, Suite B.,
South Windsor, CT 06074

*Your Home
Is Our
Business*

August 13, 2021

Mr. Robert Scully, PE
Supervising Sanitary Engineer
Environmental Engineering Program
Connecticut Department of Public Health
410 Capitol Ave., MS #12SEW
Hartford, CT 06134-0308

Re: 2022 Proposed Revisions to the Technical Standards for Subsurface Sewage Disposal Systems

Dear Mr. Scully,

Thank you for the opportunity to review your 2022 proposed revisions to the Technical Standards. We at the HBRA have questions regarding several proposed revisions, of which, we look forward to discussing and gaining clarity on at the next CAC meeting.

We noted the recommendations made by the HBRA were omitted in your most recent iteration of the proposed revisions. These recommendations include:

- **Adjustment of gallon per day capacities for single and multifamily.** Adjust the 150 gallon per bedroom per day threshold based on evidence of current water usage and actual flows. By DPH's own estimates, Connecticut households average approximately 50 gallons per day. The HBRACK would propose the DPH consider utilizing 100 gpd for the first bedroom, 90 gpd for the second bedroom and 75 for all subsequent bedrooms. In addition, the HBRA would respectfully refer the DPH to the Rutgers study titled, "Residential Demographic Multipliers: Estimates of the Occupants of New Housing". This study is widely recognized by DEEP and engineers when considering appropriate sewer capacities that result in much lower gallons per day thresholds than currently utilized by the DPH. The HBRA would argue that there is no legitimate reason why multifamily dwellings serviced by sewer or septic should be treated differently with regard to flow capacity. Ultimately, the HBRA considers this an issue of equity and fairness that should be addressed in short order.
- **Elimination or reduction of reserve areas.** The reserve area has become redundant because of modern design, installation, and repair/replacement practices. As such, the HBRA seeks the elimination of the reserve area requirement altogether. Alternatively, the HBRA would ask that DPH consider eliminating the reserve area with exception of the expansion area. Doing so would allow for greater flexibility with how a property is developed and would reduce design costs.

- **Reduction of setback requirements.** Setback requirements should be reduced to 5ft. with exceptions for instances where there is a 20% or greater slope and/or a low permeability region adjacent to the property line unless further testing supports the 5ft. setback. With these suggested parameters, abutting properties would be sufficiently protected while allowing for maximum flexibility and use of property.
- **Increasing Interface Factor for Stone Systems.** The HBRA suggests utilizing the same interface factor for stone interfaces as is used for fabric interfaces (2.0). The HBRA also contends that research submitted to the DPH clearly demonstrates that this is warranted. Other states, and even the DEEP, do not D-rate this interface differently; there has not been any indication that this is affecting failure rates. If for some reason the DPH is unable to accommodate this, the HBRA would ask the DPH to consider an option by which the stone, is cleaned to less than 5% fines passing the #200 sieve. An additional option would be to rate the stone bottom area at 1.5 and the sidewall area at 2.0. However, we do not believe that research and empirical evidence justify this. If this change is implemented, it will decrease system costs, allow for smaller more space efficient systems beneath traffic areas and provide more repair options when the only available space is beneath a traffic area.

The HBRA would like to better understand why these recommendations were excluded from the most recent proposal. If there are outstanding concerns or questions you or others might have regarding any of the HBRA suggestions bulleted above, we ask that you let us know what they might be so that we can be prepared to address them at the CAC meeting with the goal of moving them forward.

As always, we appreciate all your work on behalf of Connecticut residents and your willingness to engage our industry on these important topics. We look forward to continuing the conversation.

Sincerely,



Jim Perras, Esq.
CEO, HBRA of CT
435 Chapel Rd., Suite B
South Windsor, CT 06074
860-500-7796 (w)
860-500-7798 (f)
860-327-3800 (c)

Enc. Rutgers University: Residential Demographic Multipliers - Estimate of the Occupants of New Housing