

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



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DPH Environmental Engineering Program **February 27, 2014 Code Advisory Committee (CAC) Meeting**

Meeting Sign-in and CAC Member Updates

- CADH
- CEHA: High Marks Received for the Soils Training Workshop held in October 2013. Next workshop anticipated in 2015.
- COWRA: New alternate: Gary Yuknat
- CAWPCAs
- DEEP
- HB & RA of CT: New representative: David Litchfield, Johnny Carrier becomes alternate.
- Professional Engineers (CEPP, CSPE, CSCE)
- Soil Scientists

Water Treatment System Backwash

- DEEP issued the *General Permit for the Discharge of Low Flow Water Treatment Wastewater* on January 30, 2014. Authorizes discharges to public sewer systems and on-site dedicated disposal systems. Discharges to septic systems not authorized. Link to general permit: http://www.ct.gov/deep/lib/deep/Permits_and_Licenses/Water_Discharge_General_Permits/lowflow_gp.pdf

Legislative Updates

- The only DPH legislative proposal EEP is currently involved with concern re-codifying burial statutes.
- The Council on Environmental Quality has made recommendations that concern penalties and permit renewal periods for alternative sewage treatment systems.

State Building Code

- The 2013 Amendment to the State Building Code was passed and becomes effective February 28, 2014. Appendix O – Gray Water Recycling Systems deleted without substitution.

Nonpoint Source (NPS) Pollution Matters

- **Long Island Sound Study (LISS): Update of the 1994 Comprehensive Conservation & Management Plan (CCMP):** The LISS is planning on completing its update of the CCMP in 2014. EEP submitted comments on the LISS CCMP Review Feedback Form on November 1, 2013. Comments condensed into 2-page attachment for CAC distribution/discussion.
- **NPS Management Plan:** DEEP hired consultant, Fuss & O'Neill (F & O), to facilitate the update the NPS Management Plan. Majority of discussions to date have been between internal DEEP workgroup and F & O. DPH is an external partner, and EEP has recommended decentralized sewage stakeholder organizations be invited to participate in the plan update process.
- **Phosphorus/P.A. 12-155:** Meetings for 3 workgroups, one of which is the NPS workgroup, continue. New septic systems not a concern, however older systems in densely developed lake areas are a concern especially systems too close to groundwater.
- **LISS National Estuary Program Summary Work Plan (June 21, 2013):** Nitrogen loading from on-site wastewater systems cited as a concern, and several septic system initiatives were mentioned. It also noted the 2013 LISS Futures Fund has made on-site wastewater treatment system projects a priority for funding. EEP has reached out to DEEP for more information.

Executive Order No. 37 (E.O. No. 37)

- **E.O. No. 37:** Issued October 16, 2013 requires agencies review existing regulations to identify regulations that are outdated, unnecessarily burdensome, insufficient, or ineffective.



If you require aid or accommodation to participate fully and fairly in this meeting, please phone (860) 509-7293

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Water Supply Matters

- **DPH Private Well Program (PWP):** EEP has been handling private well calls after the one remaining PWP staff person retired in the fall of 2013. A new supervisor, Ryan Tetreault, is now heading up the PWP.
- **PHC Section 19-13-B102 Revisions:** New regulations for public drinking water standards were approved in January 2014, and become enforceable once published in the CT Law Journal. EEP will be meeting with DPH's Drinking Water Section to discuss how the regulation relates to decentralized sewage systems, and pending Technical Standards' revisions related to sewer piping.

Conferences

- **NOWRA 22nd Annual Technical & Education Conference:** The November 2013 conference included presentations by Kurt Mailman of F & O that was co-authored by Robbie Marshall on Old Saybrook's DWMD. The Executive Director, Eric Casey, of NOWRA also did a presentation on its national advocacy effort for the on-site industry.
- **NEWEA 2013 Nutrient Management Seminar:** The November 2013 conference included presentations on public sewer treatment issues, TMDL matters, and a Case Study on Old Saybrook, CT WPCA/DWMD by Kurt Mailman of F & O.
- **CAWPCAs Fall Workshop:** The November 2013 workshop included an Old Lyme presentation (Sewers vs. Sewer Avoidance).

Climate Change/Sea Levels Matters

- **Institute for Community Resiliency and Climate Adaption:** New state agency on climate change preparation at UConn's Avery Point campus.
- **9/18/13 Draft EPA New England Regional Climate Adaption Plan:** No mention of septic systems in the 67-page document. EEP sent comments (attached) to EPA on January 3, 2014.
- **Town of Guilford Community Coastal Resilience Plan:** This plan was prepared on July 31, 2013, and includes sewage disposal system recommendations. EEP provided the plan consultant, Milone & MacBroom, comments concerning the jurisdiction of community sewerage systems in CT.

New Proprietary Products & Review Status/Issues

- **Effluent Filters:** Some new filters that are not currently approved are being marketed even though DPH has been contacted.
- **Non-concrete Tanks:** Several new tanks to be added to the approved list (App. D), and other submissions deemed incomplete.
- **Leaching Systems:** GreenLeach NF & Living Filter Fixeptix systems: Cardboard interface factor issue.
- **Proprietary Low Pressure Dosing Systems:** See Summary of Proposed January 1, 2015 Revisions to the Technical Standards.
- **Dosing Systems:** GeoMatrix HydroAir, Premier Tanks Flout

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

- **Technical Standards' Revisions:** The next revision is anticipated to be published on January 1, 2015. See attached Summary of Proposed January 1, 2015 Revisions to the Technical Standards dated February 27, 2014. Each time the summary is updated it will be distributed to the CAC, and posted on the Department website.
- **ELA Ratings:** Concrete pre-casters, proprietary leaching system companies, and consultants that provided DPH comments on the ELA rating matter will be contacted on the proposed revisions.
- **Leaching Systems in Coastal Areas:** New stipulation noting that in coastal areas on sites that have a groundwater table that is tidally impacted, the minimum separation above maximum groundwater shall be 24 inches, and maximum groundwater determinations shall take into account water level rise caused by high tides.
- **Tables 2-A & 2-B:** In accordance with Public Health Code regulations, the Technical Standards are only applicable to septic systems and are not applicable to public sewer systems. Tables 2-A & 2-B concern public sewer piping, and the inclusion of these tables in the Technical Standards have resulted in confusion and inappropriate involvement of the EEP in public sewer matters. It is proposed that Tables 2-A & 2-B be removed from the Technical Standards.
- **Stormwater Non-Pipe Appurtenances (Catch Basins & Manholes):** Incorporate these structures into Table 1, and specify 25 feet minimum separating distance with a special provision for a reduction down to 10 feet to tanks if the stormwater structure has watertight pipe seals and seams with gaskets.
- **Water Treatment Wastewater Dispersal Structures:** Utilize terminology in new LFWTW General Permit, and cite a 25 feet minimum separation distance with a special provision for a reduction down to 10 feet if the discharge is less than 75 gallons per day.
- **Closed Loop Geo-exchange Systems:** Modify special provisions to allow 25 feet separation to tanks and non-upgradient leaching systems.