

If there are no records for the existing SSDS, should B-100a soil testing be conducted

Firstly, the property owner, or property owner's agent, should be advised that there are minimum setbacks required from the onsite sewage system, therefore because there are no records on file it will be necessary to determine its location to ensure compliance with the GP. Secondly, they should be made aware that the Water Treatment Wastewater Disposal System/Structure (WTWDS) needs to be located above ledge rock and seasonal high groundwater as noted in the GP, therefore gathering soil information in the area of the proposed WTWDS if necessary. If public sewers are not available, and the local health department is concerned that the WTWDS may affect soil characteristics or hydraulic conditions that could reduce the potential repair area for the onsite sewage system, then they can request a "B100a" review, which would include soil testing for a septic repair if information is not available. It would make sense to gather soil information for the WTWDS and the septic system, locate the existing sewage system at the same time.

For those not familiar with the term "B100a", it is used to reference Public Health Code Section 19-13-B100a that governs certain construction activities on sites relying on septic systems, and it is enforced by the local director of health. Certain activities (building additions and conversions, accessory structures, etc.) are specifically cited in B100a, whereas subsection (e) of the regulation includes broad language that govern "any other activity" that may affect "soil characteristics or hydraulic conditions" on a septic system site, and that subsection can be utilized to regulate activities that can affect onsite sewage disposal such as the installation of storm water infiltration systems, drilling replacement wells, and site modifications (filling & grade cuts). DPH's Environmental Engineering Program (EEP) would support local health departments utilizing their existing B100a review process/protocol in their review of proposed WTWDSs. The local director of health should authorize such reviews and support the position that the WTWDS constitutes an activity governed by subsection (e) of B100a.