

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



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Environmental Health Section

### Circular Letter EHDW #2024-29

Date: November 4, 2024

To: Directors of Health and Chief Sanitarians

From: Matthew A. Pawlik, PE, RS  
Supervising Environmental Engineer  
Environmental Engineering Program

Re: Revised Exception Application Forms for Central Subsurface Sewage Disposal Systems, Water Supply Well Separation Distances, and Easements/Off-Site Systems

The Environmental Engineering Program (EEP) has updated the application forms for an exception request for a Central Subsurface Sewage Disposal System, Water Supply Well Separating Distance and Easement/Off-Site System. To access the revised exception application forms, please visit the [Environmental Engineering Program webpage](#), or click on the links listed below. Local health officials should complete and submit exception application forms electronically. Please ensure all relevant documentation is attached when submitting the exception application. The revised exception application forms shall be utilized for all exception requests moving forward.

- [Central Subsurface Sewage Disposal System Exception](#)
- [Water Supply Well Separation Distance Exception](#)
- [Easement/Off-Site System Exception](#)

Outlined below are brief descriptions of each of the three exceptions and general guidance on the required documentation to be included when submitting exception applications to EEP.

**Central Subsurface Sewage Disposal System Exceptions:** Public Health Code (PHC) regulations stipulate that each building shall be served by a separate subsurface sewage disposal system (SSDS), unless this Department grants an exception pursuant to PHC §19-13-B103d (a)(2)(A) for a central SSDS serving more than one building. Exceptions are considered upon written application by a local health department and may be granted upon finding that the central system is technically preferable due to site limitation reasons, or to facilitate construction, maintenance, improved treatment and distribution of effluent or future connection to public sewers.

A completed application and supporting documentation, including a central SSDS plan and soil test data, are required for program staff review. Please note that the Central Subsurface Sewage Disposal System application includes a section that is applicable when a new building is proposed to be connected to an existing SSDS. Information on the existing SSDS is necessary when determining whether the proposed central system is sufficient to serve the buildings. If this information is not available, then the property owner should be advised that it is needed to make an application to this Department. Exceptions will not be granted to allow a new building to be connected to an existing cesspool, steel septic tank, or failed/malfunctioning SSDS.



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Additionally, as most Central Subsurface Sewage Disposal System exceptions requests are typically associated with construction activities governed under PHC §19-13-B100a, compliance with this regulation must be demonstrated prior to a local health department submitting an exception request to this Department. Any request proposing to connect a new building into an existing SSDS must be submitted with a plan or a sketch demonstrating B100a compliance. Activities that represent an increase in design flow are a “Change in Use” per B100a, and as such, require that a code-complying area be identified for each building on the property generating domestic sewage. When a substantial flow increase is being proposed, an upgrade to the existing SSDS may be required to obtain central system approval (this also includes requiring the replacement of single-compartment septic tanks). Further details regarding the requirements for central subsurface sewage disposal system applications can be found in [EHS Circular Letter #2012-42](#).

**Water Supply Well Separation Distance Exceptions:** The *Technical Standards for Subsurface Sewage Disposal Systems* (Technical Standards) stipulate the minimum separation distance required between a subsurface sewage disposal system (SSDS) and a water supply well. Each SSDS must be constructed in compliance with the minimum separation distance, unless an exception is granted by this Department in accordance with PHC §19-13-B103d(a)(3). An exception is considered upon written application by a local health department and will only be granted when a finding is made that such an exception is unlikely to pollute the water supply well.

As a reminder, the property owner must sign the application if there are any off-site wells affected by the exception request. Per legislation codified in Section 19a-209c of the Connecticut General Statutes, written notification by certified mail is required to be made to each property owner with an affected water supply well in which the SSDS is being proposed within its protective sanitary radius. By signing the application, the property owner is acknowledging their responsibility to provide certified notice to each affected property owner.

Each application for a water supply well exception must be submitted with supporting documentation, including a SSDS plan. A complete submission assists EEP staff in determining whether the exception is likely to pollute the water supply well and allows for timely reviews. Exception requests that have missing SSDS information or include plans lacking sufficient detail cannot be processed without delay and may require resubmission of the application. Please make sure the locations of affected water supply wells, especially when buried or otherwise not visible, are confirmed prior to submission of the application. Further details regarding the requirements for Water Supply Well Separation Distance Exceptions can be found in [EHS Circular Letter #2011-70](#).

**Easement/Off-Site System Exceptions:** PHC §19-13-B103d(d) stipulates that a SSDS shall be located on the same lot as the building served, unless an exception is granted by this Department pursuant to PHC §19-13-B103d(a)(2)(B) for an off-site system located on an easement. An exception is considered upon written application and may be granted upon receipt of a legal easement document granting approval for access, installation, and maintenance of the SSDS; a plan referenced in the legal easement that identifies the SSDS area; and an approved B100a compliance plan (if applicable/required). A “comments” section is included in the application and should be used for detailing information relevant to the exception request, such as the design specifications of the proposed septic system (e.g., building served, tank size, design flow and ELA requirements) and the reason why an off-site system is technically preferable (e.g., to achieve required setback distances).

Local health officials are strongly encouraged to complete and submit exception application forms electronically to expedite the review process. Please ensure all relevant documentation is attached when submitting exception applications electronically.

Cc: Jenna Nicol, Section Chief, Environmental Health Section, DPH