Date: March 1, 2010
To: Professional Engineers, Land Surveyors, Licensed Septic Installers, Home Builders
From: Robert Miller, Director of Health
Cc: Health District Staff

Policy #: 03-01-2010

Re: 2010 Changes to the EHHD Engineered and Non-engineered Plan Review and Approval Requirements

The Eastern Highlands Health District (EHHD) is updating its plan review and permit approval policies to replace the 12/05/2005 “As-staked or Red-lined Plan” Policy (old policy) for engineer designed plans and to establish clearer guidelines for non-engineered plans in order to streamline our procedures and address many concerns raised by our staff, plan designers and installers. We recognize that these new requirements will impact the up-front work requirements for engineered plan preparation and may impact current or pending project contract expectations and obligations, so we intend to provide some lead time for you to make the necessary in-house adjustments before these policy changes take effect.

These changes will apply to all design plans submitted to EHHD on or after April 1, 2010. Any engineered plans approved prior to that date with the conditional requirement to submit a staking plan (old policy) will still require such plans for permit approvals. If you have any questions, please call the health district Mansfield office at 860-429-3325.

ENGINEER DESIGNED PLAN - REVIEW AND PERMITTING PROCEDURE:

1. Initial plan submittal (2 copies) – the plan must show accurate topographic information in the area of the proposed building and sewage disposal system including existing spot elevations in the sewage disposal area, contours derived from the field survey work and a permanent benchmark in close proximity to the proposed sewage disposal area. A completed plan review application and fee must be submitted with the plans.

2. Plans designed by engineers will be approved with a condition that the system must be field staked by a licensed surveyor prior to installation, and the field staking must be supervised by the engineer.

3. Upon completion of field staking and prior to septic permit approval, the supervising engineer must submit a completed and signed “Staking Verification Memo” (EHHD form) to the health district.

By requiring accurate field topography on the original plans, there should not be many field adjustments or system revisions at the time of system staking except for conditions that are chosen or caused by others. In those cases, we will require a formal and complete plan revision as noted below:
Causes for Revisions:

- **Design Revision after plan approval** – Revisions to system size, location and design must be submitted to the health district for review and approval. A plan review application, two sets of plans and a review fee are required with any such revised plans. Revised plans must include all necessary changes related to the revision including revisions to proposed contours, cross-section details, etc.

- **Site disturbance after plan approval**. If the sewage disposal area is disturbed by filling, excavation, compaction, etc. at the time of the system staking, the supervising engineer must inspect the site and evaluate the impacts of the disturbance on the approved system design. The specific site disturbance must be noted on the staking memo. If the supervising engineer determines that plan revisions are required due to the site disturbance, revised plans must be submitted to EHHD for review and approval.

- **Minor adjustment due to field variation in topographic information** - Minor adjustments to the system elevation (a few inches) or location (a few feet) that do not impact the proposed grading plan, minimum separating distance requirements, or other system components can be noted on the “Staking Verification Memo” by the supervising engineer. More significant system revisions must be submitted to the health district for review as “design revisions” (see above).

- **Major field adjustments due to field variation in topographic information** should not be required with the increased accuracy of topographic information on the original plan. If major discrepancies in the existing topographic information are discovered, the topographic data source for the original plan must be evaluated and revised design plans should be submitted for the proposal.

2. **The Permit to Construct** (septic permit) will be approved when a completed permit application and fee have been received by EHHD and the Staking Verification Memo is received and approved by EHHD. **The licensed Installer’s ID must be verified prior to the septic permit approval.** All approved permits will carry the following conditions:

   - No system construction can begin and no inspections will be scheduled until after the septic permit is approved.
   - The approval to construct will be valid for a period of one year from the date of issuance.
   - Approvals to construct may be renewed for an additional one year period by the director of health upon a demonstration of reasonable cause for the failure to start construction within the one year period (PHC 19-13-B103e (f)).
   - **The installer must notify EHHD at least 24 hours prior to the start of construction - after the septic permit is approved.**
   - The licensed installer must contact EHHD to schedule all required inspections for the system construction.

**NON-ENGINEER DESIGNED PLAN REVIEW AND PERMITTING PROCEDURE:**

1. Non-engineer designed plans for new and repair sewage disposal systems must be submitted for review and approval to the health district along with a completed Permit to Construct application and fees.

2. The plans must provide enough information to show compliance with all requirements of the Connecticut Public Health Code and the Technical Standards for Subsurface Sewage Disposal Systems. Incomplete plans will be returned for revision.
3. EHHD has developed new instructions for non-engineered sewage disposal system designs to identify the minimum plan requirements for Code compliance. We have also developed an optional design criteria worksheet that can be used as a supplement to plan submissions to ensure that the design proposal includes all of the information necessary for our review and approval. *(See instructions and worksheet attached)*

4. The Permit to Construct will be approved when the plan is approved. All approved permits will carry the following conditions:

- The system must be field staked by the installer and the installer must contact the health district to schedule the staking and benchmark inspection.
- The installer must notify EHHD at least 24 hours prior to commencement of construction.
- The installer must contact the health district to schedule all other required inspections noted on the approved permit.
- No system construction can begin until after the staking inspection and approval by the health district.
- The approval to construct will be valid for a period of one year from the date of issuance.
- Approvals to construct may be renewed for an additional one year period by the director of health upon a demonstration of reasonable cause for the failure to start construction within the one year period ((PHC 19-13-B103e (f))).

If you have any questions about these policies, please call the health district Mansfield office at 860-429-3325.