

EL PASO COUNTY ON-SITE WASTEWATER TREATMENT SYSTEM PROGRAM

TECHNICAL ADVISORY GROUP

MEETING MINUTES

Monday, September 23, 2019

2:00 – 4:00 pm

1675 W. Garden of the Gods Road, 2nd Floor
Snow/Miller Conference Room

- **Welcoming Comments/Introductions** – Kat McGarvy/Aaron Doussett
(Action Requested) Information only)
-El Paso County Public Health welcomes new Environmental Health Director Aaron Termain. New additions to Environmental Health's OWTS team include Environmental Health Specialists Robert Beene, Kevin Bolinsky, and Phil Cavinta.
- **Action Items from December 2018 TAG Meeting** - Kat McGarvy
(Action requested) advisory and discussion)
 - Pump Repairs
 - *Pump repairs do not require a permit. If you are making a repair, please make note of the pump model and type. You may send any repair details to EPCPH so that this can be documented with the OWTS file. EPCPH specialist will begin verifying and documenting pump specifications as a function of the final inspection.*
 - *Looking for input to develop an official SOP type document which indicates what repairs do not require a permit.*
 - **Sand Gradation**
 - i. Preferred Sand
 - *Verify twice, initially as a function of application submittal/approval and again at time sand is placed*
 - ii. Secondary Sand
 - *90% of sand pits verified by the CDPHE meets gradation requirements for secondary sand., In most cases soil replacement will require engineering. Therefore, sand installation will require verification of gradation. This must be noted by the engineer in the final certification letter submitted to EPCPH. It can be a simple statement along the lines of "Sand gradation verified and meets minimum requirements for secondary*

sand within 30 days of sand placement.” The previous is just an example and verbiage can be at the engineer’s preference. EPCPH along with other front range Public Health departments are in consensus regarding verification of gradation via the engineers review and letter.

- Pump Functionality
 - Conventional systems with pumps require pump functionality verification. If the specialist cannot flip the test switch to verify functionality, a return trip fee will be assessed.
 - a. For dosed (pump-to-gravity), conventional systems, you may submit videos at the discretion of the specialist.
 - Higher-level treatment systems will require pump functionality at the time of the final inspection.
 - a. Pump functionality for 1 PD systems or higher is require.
 - b. RBD signoffs will not be completed without the required paperwork in addition to verification of the pump system.
 - c. Systems require operation and maintenance (O&M): regulation requires (2) initial 6-month inspections on new systems, prior to the annual requirement. EPCPH has not been verifying these inspections, however as of January 1, 2020 any NEWLY installed HLT system will be required to meet the (2) initial 6-month inspections, then annually from the second 6-month inspection.

- Design Documents – Kat McGarvy
(Action requested advisory and discussion)

- Requirements/Clarifications
 - Profile pit locations must be included on the design document when submitting an application. Profile pits must be marked at the time of application submission.
 - Design documents must meet the below minimum requirements:
 - a. Proposed layout of the OWTS system
 - i. Location of all proposed components (tank(s), d-box, trenches, bed, effluent lines, etc.)
 - ii. Dimensions of trenches or bed
 - iii. Proposed depths of all components
 - b. Location of following:
 - i. Soil profile pits
 - ii. Alternate soil treatment area
 - iii. All applicable physical structures including distances to OWTS components
 - iv. Property lines
 - c. Slope of the land

d. North arrow

- Multiple Design Revisions

- Environmental Health Specialists will not red line items that require corrections.

- a. A proposal to assess a design fee is being considered. The Front Range counties currently have this fee as a part of their OWTS programs and are actively using this for multiple design revision reviews.

- i. The idea is; one design review would be included in the cost the initial application. Should that design document not meet at minimum the above requirements or any part of the regulations, which apply to the design, it would be returned for correction to the designer. If this process must occur on more than one occasion, a fee would be charged for each subsequent review.

- ii. THIS IS JUST A PROPOSAL AT THIS TIME. Communication will occur when this becomes a part of our fee structure. Any input is appreciated from our industry partners at this time.

- Mound Designs

- It is expected that the mound design document be used. If it is not, the design will be returned.
 - Full basal area of the mound must meet the most conservative "I" value within the mound design document..document.
 - The ENTIRE footprint of the basal area must be filled with sand, as intended in the design document. EPCPH is choosing to be more stringent and not allowing the use of "other" fill material (top cover) to account for any of the total basal area required.

- Final Inspections – Kat McGarvy

- Requirements/Clarifications

- Pipe ~~must~~ be bedded at the time of final inspection.
 - Inspection ports ARE REQUIRED at the beginning and end of trenches in addition to all 4 corners of bed systems.
 - Infiltrative surfaces must be level

- Upcoming OWTS Program Information – Kat McGarvy

- (Action requested advisory and discussion)

- Certified Inspector Audit Program

- Inspectors, please provide detailed clarification on inspection reports comments.

- The OWTS team is looking into options that provide more clarification to Transfer of Title clients who receive conditional acceptance documents
- Environmental Health Specialists will conduct field inspections with Certified Inspectors to ensure inspection reports are standardized amongst the industry.
- The OWTS team will develop additional guidance documents and education materials to provide to the industry and public.
- A subcommittee will be established to discuss the implementation of an audit program. In addition, to ensure consistency among industry and regulatory requirements, this committee will help to develop standard language comment library, inspection form, implement any potential changes to the Transfer of Title program as a whole.
 - a. Please email Christine by November 1st, 2019 if you would like to become a member.
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- O & M Program
 - Systems require operation and maintenance (O&M): regulation requires (2) initial 6-month inspections on new systems, prior to the annual requirement. EPCPH has not been verifying these inspections, however as of January 1, 2020 any NEWLY installed HLT system will be required to meet the (2) initial 6-month inspections, then annually from the second 6-month inspection.
 - Looking to develop the O & M program, which is a requirement of the regulations.
 - Siphon dosing (1 PD) systems require Operation and Maintenance ~~inspections, inspections~~; systems are losing functionality they are not being inspected regularly.
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- **Round Table Discussion – Industry Members**

(Action requested advisory and discussion)

 - Open to Other Discussion:
 - Mike Murray: Comments were addressed during the discussion of Certified Inspector and O&M Discussions
 - Tim Galvin:
 - a. Discussed the use of tee/wye's in the distribution of effluent. Brought concerns about the inability of items to dived or provide a somewhat equal distribution of effluent among the STA.
 - b. Discussed the use of distribution boxes as the better alternative to serial distribution and tee/wye.
 - c. "Failure"- Need to determine the appropriate use of the word and what constitutes a failure. Develop some consistency around what requires action in the sense of failure and what does not but may need some further clarification or investigation.

Next Meeting Date: December 2019, date to be determined.