

Kat McGarvy

From: Kat McGarvy
Sent: Monday, June 21, 2021 8:27 PM
Subject: OWTS Updates 6.21.2021

Importance: High

Good Evening Partners,

I wanted to take a moment to provide a couple of important notes and updates related to OWTS Program in EPC. Please be sure to read this email in its entirety and I will also be posting the memo on our industry page for future reference as well.

OWTS Regulation Revision Hearing:

- The OWTS Regulation revision and clarifications **has been continued** at minimum until August, more information to come when I know more as well. It is likely that we will be looking at possibly adjusting our OWTS Fees as they have not be assessed since 2016. My intent with the addition of a design revision fee and homeowner install fee is to help keep the general permit cost stable or minimal increase. However, it is important to note that if our fees do not cover our staff time for the work that is required, our turnaround times and processing will continue to suffer. Please keep in mind the balance that is had here. More to come ... but please see the next note as I continue to work for and advocate for additional staff assistance.

New OWTS Team member training:

- I would like to announce that we have been able due to increased demand and the continued building in EPC to add some team members to our staff specifically for OWTS. We are adding an additional Program assistant to our administrative team as well as an additional field EHS.
 - o Program Assistant: more to come as this is in process of being filled
 - o Field EHS: Please welcome Katie Hutchison to our OWTS Field staff. Katie has been assisting primarily in our COVID response efforts but comes to us with a background in Environmental policy. She has begun her training with both Kevin and myself and is well on her way to being a great addition to the team.
 - Katie will primarily assist in the Conventional Application review and the OM program as well.

Designer List:

Currently our OWTS team is seeing an increase in the need for requesting design revisions. These requests are necessitated from soil reports or design revisions which do not meet minimum standards of the regulations. Some items requiring design revisions:

- Lack of identifying rock content
- Identifying rock content and not accounting for the associated design parameters.
- Lack of soil profile pits relative to STA intended location
- Mis classification of soil type, specifically structure and type

In 2019, 15% of submitted designs did not meet standards on the first review. In 2020, 17% of designs did not meet standards on first review. In 2021, 25% of designs do not meet standards on the first review and many designs have required multiple design revisions.

In an effort, to increase transparency and community education, EPC will be putting together a list of designers and including the number of soils/designs submitted and the % of those designs which meet standards on the first review. This will provide the public more educated decision making as well as provide parameters for the design revision fee. This list will likely be done on a quarterly basis to account for design submissions and ensure those % are accurately reflected. **It will be a designer excellence list of sorts, and I would welcome any feedback on this.**

The development of this is in process and under review right now. I will provide more information to our industry partners prior to going live with this list.

Design Document Requirements:

- Recently we have been identifying some subpar or less than appropriate design documents being submitted. This is a reminder of what is required when submitting a design document with an OWTS Application.
 - o Design document requirements:
 - Drawing that is created relative to the property and all pertinent features.
 - Minimum is 8.5x11 but should not be so big that it requires zoom to see detail.
 - Relative to the property as a whole:
 - Should include property lines, all structures on or planned for property, wells or other water features, floodplains, slopes, any additional OWTS locations, soil profile pit locations, **alternate STA location**
 - Measurements to a permanent/fixed benchmark on the property. Power pole, elevation mark, detention pond, structure etc.
 - Must include measurements to all items requiring specific setbacks both ON and OFF the property
 - Must also note if multiple profile pits are dug. Confirm the indicated installation location is in the area of the profile pits submitted. Must identify profile pits on permit language if multiple is noted
 - Detailed Drawing:
 - This drawing can be a more focused version of the intended construction plan. Should include detail from the structure to all OWTS components including the tank, distribution type and STA layout.
 - The drawing must also indicate the location of the profile pits relative to the STA location as **well as a cross section of the intended installation depth**
 - Must include measurements to all items requiring specific setbacks
 - Detailed drawing must be the intended plan for installation and include the pipe from structure to tank, and from tank to STA. STA must be drawn and reflective of the system layout indicated. (Meaning, drawing a box or mark system location is not complete. It must be reflective of bed/trench layout as appropriate)
 - Identify number of structures being connected – Multiple structures must be evaluated for appropriateness of system design submitted
 - o Site Plan
 - Site plan for new system differs from the overall site layout in that it is required to have all property dimensions and distances from all components to the property lines. This

varies based on each development as well and is evaluated by DSD. The SITE PLAN and OVERALL SITE LAYOUT must be consistent with location of OWTS.

Please note that any drawing not meeting the minimum above requirements will be kicked back and require resubmission beginning July 1, 2021. Any drawing not meeting these requirements between now and July 1, 2021 you will receive an email reminder from your specialist with the missing components as a reminder to include on future submissions.

Rock Content for soils analysis:

There is a very clear requirement in the EPCBoH Chapter 8 Regulations to account for rock content as a part of the soils analysis. Table 10-1A accounts for soil types having greater than 35% rock content, where rock content is determined as 2mm or greater in size. The amount of rock in the soil can severely limit or restrict the treatment capabilities of the soil. Ultimately, table 10-1 and 10-1A, provides the necessary requirements to evaluate in TOTAL the soil profile on that site. **Soils reports without rock content reported will be returned to the engineer for clarification.** Our specialist and team also evaluate the site prior to issuing the permit and will question rock content if necessary as well as at time of excavation and installation.

Yes, it has happened, where a system goes into the ground and has to be removed due to the unaccounted for presence of rock. Please be sure to include in your evaluations moving forward the % of rock greater than 2mm or as defined in Table 10-1A.

2018 Plumbing Code update:

I was notified by Regional Building Plumbing Inspectors that as of Monday June 14, 2021 they have adopted and are using the 2018 Plumbing code for all new installations. This is impactful to our industry, specifically on new construction, as the plumbing code requires a double sweep cleanout on the plumbing existing the structure. Our regulations do not currently reflect this and still provide an option of a single sweep or sanitary T installation. Although many of your currently install double sweeps as standard practice, I would highly encourage all of our industry to adopt this standard. If the RBD Plumbing inspector does not see a double sweep cleanout installed outside the structure they will require a double sweep clean out in the structure.

I would highly encourage you to begin installation of a double sweep clean out as a standard practice on new construction to align with current plumbing code and avoid an additional cleanout installation inside the structure.

Operation and Maintenance:

Unfortunately I was not successful in getting the CPOW education department to host an additional class for O&M. The next classes are scheduled for NOV/DEC of this year. Please note they are filling up fast and you will be required to have both certifications to be an OM specialist in EPC. Since this has been in the regulations for 3 years and we have had previous conversations related to the initiation of this program there is no leeway on this requirement. Currently we are only sending requirements to those newly installed systems but as of 2022 will beginning encompassing those system which previously were not included.

REMINDER: This is a very different and more involved inspection process than that of the Certified Inspection program. NO Certified inspectors are not able to complete OM requirements unless OM Certified.

Some items to note from the initiation of this program:

- Zip ties holding the float tree are NOT holding up.
 - o Best practice is to use the PVC Snap which can be easily secured to the riser.
- Control panels:
 - o Breakers which turn of the electricity to the panel itself are considered a disconnect. However the HOA switch is not.
 - o When installing a control panel on the riser please be sure there is sufficient clearance between the riser and grade. Control panels should not sit at ground level in areas where they may be impacted by critters or weather events.
- Orifice shields
 - o While not required are HIGHLY Encouraged as the pump is producing pressure that can adversely impact the sand filter or soil as it transports effluent
- Operating head and squirt height
 - o There is a very specific requirement for operating head at the distal end to produce a squirt height of 30-72” upon system start up.
 - o This is an integral component of the OM program and any system utilizing pressure distribution will need to have this documented and verified.
 - o **I WILL NOTIFY ALL INDUSTRY OF THE START DATE FOR THIS REQUIREMENT**
 - If the engineer does not verify this as a part of their final and start up inspection EPCPH inspectors will require a scheduled final inspection to verify/document this component.

As always I am open to feedback on any item noted above. I am looking forward into September and barring any unforeseen setbacks plan to return to in person TAG/industry meetings. More to come on this as we get closer but know that I have appreciated you patience and feedback through this last year as we dealt with less than ideal conditions.

Have a Great Evening.

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To find a COVID-19 vaccine provider in El Paso County, you can:

🌐 Visit [El Paso County Public Health's Provider Page](#)

📞 Call 211

📧 Text “vaccine” for English or “vacuna” for Spanish to 667873

