

Kat McGarvy

From: Kat McGarvy
Sent: Monday, January 3, 2022 1:35 PM
Subject: OWTS Updates 1.3.2022

Good Afternoon,

2021 IN REVIEW

As we close out yet another year I thank you for your patience as we work to improve the OWTS regulatory program, the past year has seen many challenges and opportunities. Some of the most significant 2021 Highlights include record growth within El Paso County, a reduction in permit issuance turnaround times, and a shortage of supplies. While we still have some work to do we were able to impact many areas of the OWTS industry this year.

- **El Paso County Growth**

- 2021 brought with it many new opportunities for development and growth. Along with the growth and development comes an increased need for OWTS as much of the growth occurred in rural areas with little to no sewer access. This past year also saw the highest number of OWTS permits issued within EPC exceeding the previous year by ~9% with 680 permit applications submitted in 2021. About 56% of those applications were for new construction of an OWTS.

- **Permit Turnaround Times:**

- As we experienced a record number of OWTS permit applications in 2021, we were able to work with El Paso County Public Health Leadership team make necessary adjustments for processing those applications. Through changes within the Environmental Health Division of El Paso County Public Health, we were able to dedicate staff time specifically to the OWTS program. This dedication of staff time enabled us to go from 3-5 week processing time down to 5-7 business days with most submissions. While we are still working on reducing processing times, this is a huge accomplishment for 2021 and has helped the industry obtain other agency permits in a more efficient manner.

- **Supply Shortages:**

- The OWTS industry has not escaped the supply chain problems much of the world is experiencing right now. There are many times that chambers, pumps, and control panels have been on back order or hard to obtain in a timely manner. The industry has been able to work through all these concerns with minimal impact as a whole. However, this is expected to continue well into 2022, and I ask that we all remain cognizant of this to ensure those systems which are being used immediately or currently are able to be repaired as necessary. This is important as we continue our efforts to protect public health and environment as well as safe guarding against human exposure to sewage.

There is no doubt we will continue to experience many challenges moving forward. COVID is still a very real concern and has had lasting impacts far beyond what many people could have imagined.

OWTS Activity	2019	2020	2021
Permit Applications	587	616	680
OWTS Inspections	615	651	686
Licensed Installers	-	-	85
Certified Inspectors	-	-	39
Certified O&M Inspectors	-	-	4
O&M Systems	134	130	179

LOOKING FORWARD 2022

There are many areas we hope to be able to work through in 2022. Many will take some time as we are still unable to meet in person for TAG meetings or group discussions. Below are a few of those items we are prioritizing for the upcoming year.

2022 Holidays

Martin Luther King Jr. Day – Monday January 17, 2022

Presidents Day – Monday February 21, 2022

Memorial Day – Monday May 30, 2022

Independence Day – Monday July 4, 2022

Labor Day – Monday September 5, 2022

Veterans Day – Friday November, 11, 2022

Thanksgiving Holiday – Thursday November 24, 2022, Friday November 25, 2022

Christmas Holiday – Friday December 23, 2022, Monday December 26, 2022

As reminder there are NO finals on these listed holidays and all requests must for finals following the holiday must be received prior to 1pm the day before.

OWTS Regulations Update

Please note that we are still suspended with regard to our pending update of the regulations. When I receive word that we are able to move this forward I will be sure to let everyone one know.

Open Profile Pits – HWY 24 W

Unfortunately, we have experienced less than ideal conditions and installation situations occurring in this particular area. There are many reports being submitted that once the STA has been installed are not able to be approved due to a deviation in soil from that reported and approved for permit. In order to prevent a significant time and cost impact after system installation we will need to make changes to our general process.

We have found several inconsistencies in soils reporting within the area, most specifically when addressing rock content. EPCPH is rarely notified when soil conditions change and we are not able to address the problem prior to final installation inspection. This has resulted in costly delays and changes which are often passed down to the property owner. To address this we will move to a site specific change as described below:

This will be a SITE SPECIFIC change effective as of January 1, 2022. This change will require that both profile pits remain open upon submission of the application for permit. Our specialist will need to see these pits open to observe the soil as it is being reported. The intent of this change is to prevent costly delays to the applicant and homeowner, when the soil change is significant and not appropriately identified on the front end

of the process. Additionally, this will be used to gather data within the area, specifically to address a potential sit specific regulation.

Recognizing that this requirement impacts safety of the area, we will be available to meet on site and observe the profile pits at the time they are being dug. Please note that a 24 hour notice in the same manner as a final inspection request can be used for this purpose. Otherwise, any HWY 24 W application received will be immediately processed and site evaluation occurring upon payment and assignment to the specialist. It is also important to mention, that any soils analysis previously done will still be required to meet this expectation, so older profile pits will need to be reopened prior to site evaluation and subsequent permit issuance.

Installer Testing

All requests to take any OWTS required test will now need to be scheduled online and can be done by visiting [our website](#) to schedule your appointment. Please note that OWTS exams are scheduled on Thursdays between 9-2pm.

As a reminder, renewal will either require you to retake the Part A exam or submit 10 Continuing Education Units (CEUs). CEUs are offered through Colorado Professionals Onsite Wastewater (CPOW) and National Association of Wastewater Technicians (NAWT). Renewal of the Certified Inspector and Certified Operation and Maintenance course are required for those specific credential requirements. Renewals of those credential courses are done through CPOW/NAWT, questions related to such would need to be directed to those organizations.

OWTS Reminders and General Information

Please find below a list of general reminders and information:

- Application Submissions:
 - Please be sure to include contact information for the property owner on all application submissions. Failure to submit the application with their information will result in you receiving correspondence related to the property.
 - Be sure all the appropriate documentation is submitted with your application. We are seeing missing soils reports or foundations reports being submitted in place of OWTS soils reporting.
 - For all conventional systems it is important to be sure that the design document is consistent with the site plan and meets all necessary requirements.
 - For instance, several design documents are being pushed back due to lack of profile pit locations on the design document.
 - Design documents must be readable, meaning if the property is large a sit plan relative to the whole property including boundaries and the OWTS components and their location must be submitted. You can then submit a second page which shows the OWTS in more detail.
 - 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
 - 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.
 - Be sure that you are researching the potential for Floodplains on the property. All systems must be installed outside of the Floodplain where feasible otherwise FEMA requirements must be met.
- During Construction:
 - **Reminder that as a function of holding a license within EPC to install OWTS requires that you stop construction and NOTIFY EPCPH if field conditions change significantly from the submitted and approved documents.**
 - Changing field conditions include but are not limited to:
 - Encountering groundwater or bedrock
 - Change in soil type from that reported or which the OWTS was designed. Specifically related to encountering increased levels of rock content, change from sand to clay, etc.
 - Location of the STA was changed due to other construction related changes. I.e. the plumbing stub out was relocated within the structure, a retaining wall was built and impacts the STA location, the well was installed in a different location than originally planned, etc.
 - Reminder that the OWTS Regulations requires that the STA be installed immediately adjacent to the location of the approved profile pits. This will be verified at time of final inspection. If determined that it was not immediately adjacent to the profile pits a new pit will be required prior to approval.
- Final Inspections:

o **READ YOUR PERMIT IN ITS ENTIRETY**

- o All pipes are required to be bedded at time of inspection
- o Control panels and power to the pumps must be physically verified and will require a second inspection fee if not able to do so at time of requested inspection
- o Depth restrictions **ARE NOT OPTIONAL** in any capacity and must be adhered to strictly. Should you not be able to make the appropriate depth you must notify EPCPH prior to system installation to discuss options.

- Change Request forms:

- o Change request forms can be used to communicate field changes that may not necessarily require issuance of a new permit but do require communication of the change prior to inspection. These are intended to be a document for tracking the appropriate communication was made and received approval from EPCPH.
- o Note there is both an Administrative and Field change request section. If you have questions please call and we will assist you in completion of the form

- Form Changes

- o If you haven't already you will start to notice some additional form changes rolling out. In an effort to align all forms to the same formatting we are updating them to be consistent across the program. You will see new OWTS permit formats and new Transfer of Title Acceptance Document format rolling out soon.

- OWTS Policies in Draft

- o Fully recognizing that there are some areas which may not be as clear as they could be in the interpretation and application of the current regulations and based upon many requests from the Industry we are working to formalize the following policies. These will be sent out in draft form for comment via email. It has been quite difficult to keep the ball rolling on many of these without our in person meetings; however, it is quite important we find a way to continue working on these as well.
 - Remediation Systems
 - Installation in a Floodplain
 - Alteration Policy
 - Multifamily OWTS Policy

Please note this will be posted on our website as well under [View Recent OWTS Industry Updates](#). Although we are not able to meet in person yet and that has been extremely challenging we have found a way to make due with what we are able to do. Please know that at any time you have a question, concern, or comment both positive or constructive I am always available to listen. I cannot promise that I will always be able to fix your concern in that moment but I will certainly listen and assess your concern to the best of my ability as we continue to work to move the OWTS Industry forward and improve EPC and the OWTS program together.

HAPPY NEW YEAR!

Regards,

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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

