

Memorandum

To: Regional Office Staff

From: Roger

Re: Standard permit condition for systems using the performance based approach
§1-502(d)

Date: January 31, 2005

Below is the standard permit condition that is to be used for all of these systems, starting immediately. Anne looked at the language and made a change to require inspection for a distance of 25' in all directions, as opposed to just downslope, just in case the system is installed on a flat site. I also changed the condition to require the inspections to begin after the system is placed in use, not after the system is installed. The only case specific change is related to whether a class B designer can do the inspection.

The use of the wastewater disposal system approved in this permit requires that an annual inspection be performed by (a class 1 or class B ((select all that are appropriate))) designer starting when the system is placed in use. The field inspection shall be done in April or May of each year and a written report shall be submitted to the permittee and the regional office that issued the permit by the following June 15th. The inspection shall consist of a field inspection of the area where the leachfield has been installed. A visual observation of the surface area over the system and the area within 25' of the system in all directions shall be made for any indication of failure. This inspection requirement does not require the installation or observation of groundwater monitors and does not require inspection of other component of the wastewater system such as septic tanks, pump stations or advanced treatment systems. Such inspections may be required if they are part of the approved design, including any operation manuals or written instructions, or if they are required in another permit condition. This condition remains in effect until three inspection cycles have been completed as specified in this condition.

Note: Inspections are to be done only by designers who are eligible to prepare the design. The determination of which class of designer can do the inspection is based on the most restrictive limitation for the project. Therefore if there are one or more components that can only be designed by a professional engineer the entire wastewater system and all inspections shall be done by a professional engineer.

I don't think we ever run into a performance-based design that does not include a site modification which would not allow the inspection to be done by a Class A designer. Let me know if you have examples of systems that can be designed on the performance based approach that are not considered as site modifications.