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DEPARTMENT OF HEALTH

Greenwich Department of Health 100% Replacement Policy
for
State of Connecticut Public Health Code,
Section 19-13-B100
(1994)
(Updated 2004)

As you are aware, the above Section of the State of Connecticut Public Health Code discusses potential additions or conversions of existing dwellings.

The current Code does not require that the leaching system be physically expanded at the time approval is given for either a change in use, building conversion or addition to existing structures. The reasoning is that residential sewage disposal systems have historically been constructed with a reasonable safety factor incorporated. Although the act of physically enlarging the system would provide some degree of consumer protection, it would not necessarily represent in some cases the best overall proposal for long-term on-site sewage disposal. It is agreed that the only type of room which has potential for increasing water usage is a bedroom, however, many times existing homeowners add one bedroom to give their children their own rooms, not because there has been an increase in the household's population. Two or more bedrooms clearly indicate a major change within the household. In proposals for in-law apartments, and/or business practices, additional water usage may be introduced so expansions may be necessary. Proposals must be discussed on a case-to-case basis. The Greenwich Municipal Code allows the department to be more stringent in requiring system modification or any expansion.

In light of the above information and still allowing the homeowner some flexibility, the Department will approve a one-time One Bedroom Addition to the dwelling without having to add onto the existing sewage disposal system. The following is a list of those conditions and provisos for this approval:

- The existing system must be in good working condition. "Good working condition" is defined in the Greenwich Municipal Code under Sec. 4-89 Failure of System. If none of these conditions exist, the system will be considered to be in "good working condition". This does not prohibit a certified engineer and/or licensed septic system installer to suggest to the property owner addition and/or replacement to the system of investigation results warranted the suggestion.
- The existing system must be properly sized (by the most recent codes that exist at the time of the request) for the existing amount of bedrooms already within the dwelling.
- The existing system must be constructed as a conventional sewage disposal leaching system (septic tank with leaching fields).
- The proposed addition does not interfere with the existing system.

- Identification of a 100% replacement area sized to include existing number of bedrooms plus the one bedroom addition.

If there is a reserve area already designated and existing deep test holes and soil percolation data is available and is less than ten years old, the area may be considered to be used as the 100% replacement area if the system designed will meet code requirements. Additional preliminary tests may be warranted. If a 100% “virgin” replacement area cannot be found on the property the area of the existing system may be included, if it meets the soil conditions for design. If, however, the conditions for approval of a 100% replacement area cannot be met, the request will be denied. A proposed replacement plan complying with all code requirements must be submitted and approved prior to the Department signing off on the building plans.

This program will begin on November 15, 1994. A fee will be required with the proposed 100% replacement area design plan. It is required that you label the plan 100% Replacement Plan which will be issued a certification and kept on file for future needs. It should be made clear to the property owner that this area shall remain essentially undisturbed.

Expansions, Additions or Changes In Use (Excluding Bedrooms):

The Department’s response to requests for expansions, additions or changes within the household will vary with respect to the property owners’ request. If the building footprint is not to be expanded, and the size of the addition/expansion is larger than any other single room already existing in the home or exceeds 25% of the existing living area of the home then a 100% replacement area must be designated. When a homeowner increases the dwelling more than 25%, additional water usage is certain. If the building footprint is expanded, it must not interfere with the existing system, must meet all required setbacks and the lot must have a designated 100% replacement area. Remember, the area of the existing system may be considered part of the replacement area if it meets soil conditions. If an existing reserve area is on the lot it must be able to support the replacement system if it is to be utilized.

Review requirements:

1) Existing System Can Be Completely Used When:

- When keeping the SAME dwelling foundation and first floor exterior walls. (No demolition permit required)

2) Existing System Can Be Completely Used With a Designated 100% Replacement Area When:

- Increase house size for only one additional bedroom beyond the existing amount of bedrooms.
- Increase 25% of the existing living area or expansion/addition larger than any other single room that existed.
- Where the evaluation of the existing system proves to be in “good working condition”.
- When the existing system is of conventional design (septic tank and leaching fields).

3) Existing System Cannot Be Used When:

- The existing system is not in “good working condition”.

- When the existing structure is taken down to the foundation and only studs left on first floor (All exterior walls must remain intact. (The lot then must be treated as NEW construction with a primary and reserve area – demolition permit is required).
- When the existing system is not of conventional construction (i.e. – cesspools).

TENNIS COURTS

It is agreed by State and Local officials that recommendations be made not to construct over existing or newly proposed systems or within designated reserve area. There are no code restrictions preventing this from occurring, however, if a tennis court is installed the following is to be considered:

- 1) The placement of fill material on top of the functioning system would not be damaging if placed in proper sequence. Obviously no heavy equipment should be driven across the primary and reserve areas or even on soils down gradient.
- 2) Fill should be preferably clean, bank run sand and gravel and dumped on the perimeter beyond the system. A light track bulldozer should push the fill taking care not to damage the system below.
- 3) Heavy duty effluent distribution pipe, for pipes not bedded in stone, should be used.
- 4) Placing the distribution boxes on the outside of the court will allow easy access.
- 5) For those properties with no designated 100% replacement area the obvious concern is replacement of the sewage disposal system. Therefore, a 100% replacement area would have to be designated.

Another concern with regard to tennis courts installed above leaching systems, is the designation of a replacement area beneath a tennis court. Information must be provided regarding the proposed construction of the tennis court, specifically proposed elevations of the tennis court. Designation and approval of a 100% replacement area is based upon soil conditions witnessed at the time of site investigation. In construction of a tennis court, care must be taken not to disturb and/or destroy the natural soil conditions of the approved replacement area.

PLAN REVIEW:

The majority of plans submitted for review need revisions. Understandably some lots are extremely difficult and revisions are necessary. However, in an effort to reduce the enormous time spent by the staff on revisions, it is requested that all necessary items contained on the checklists for detailed plans be provided. Another suggestion is to discuss any controversial issues with the Environmental Hygienist prior to submitting the plan and to possibly review the house plans with the architect. Often building plans cannot be approved because the septic system design does not match the house plans.

Your cooperation to reduce the amount of revisions submitted will be greatly appreciated since time is of the essence when managing an Environmental Health Program this size. The Division's staff will be able to answer any questions you may have. If there is a conflict, request to speak to the Division's Supervisor.