

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Jewel Mullen, M.D., M.P.H., M.P.A.
Commissioner

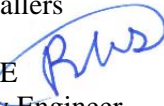
Dannel P. Malloy
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Lt. Governor

Environmental Health Section

EHS Circular Letter # 2012-42

DATE: July 12, 2012

TO: Local Directors of Health
Registered Sanitarians
Professional Engineers
Sewage System Installers

FROM: Robert W. Scully, PE 
Supervising Sanitary Engineer
Environmental Engineering Program

SUBJECT: Central Sewage System Exception Applications

Public Health Code (PHC) regulations stipulate that each building shall be served by a separate subsurface sewage disposal system (SSDS), unless this Department grants an exception pursuant to PHC Section 19-13-B103d (a)(2)(A) for a central SSDS serving more than one building. Exceptions are considered upon written application, and may be granted upon finding that the central system is technically preferable due to site limitation reasons, or to facilitate construction, maintenance, or future connection to public sewers.

Attached is the Central Sewage System Exception Application that local health officials shall utilize for such requests. A completed application along with supporting documentation including a central SSDS plan must be submitted in order for program staff to review the exception request. Please note that the application includes a section that is applicable when a new building is proposed to be connected to an existing SSDS. Information on the existing SSDS is necessary when determining whether the proposed central system is sufficient to serve the buildings. If this information is not available, then the property owner should be advised that it is needed in order to make an application to this Department. Exceptions will not be granted to allow a new building to be connected to an existing cesspool, steel septic tank, or failed SSDS.

Central sewage system exception requests, except those for new construction on undeveloped properties, are typically associated with construction activities that would be governed by PHC Section 19-13-B100a (B100a). Compliance with this regulation needs to be demonstrated to the Local Director of Health prior to submitting an exception request to this Department. Any request proposing to connect a new building into an existing SSDS must be submitted with a plan or sketch demonstrating compliance with B100a.



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The majority of central sewage system exception requests submitted to this Department are for plumbing fixtures in associated outbuildings on single-family residential properties. An outbuilding is a structure that is located on the same lot as a residential building, and cannot be split off and sold as a separate residential building. Outbuildings include, but are not limited to, detached garages, workshops, barns, pool-house cabanas, game rooms, guest houses, in-law apartments, etc.

Every central system proposal should be reviewed on a case by case basis. Activities that represent an increase in the design flow are by definition a "Change in Use" per B100a, and as such, require that a code-complying area be identified for each building on the property generating domestic sewage. Examples of this would be a proposed outbuilding containing an in-law apartment (additional bedroom), or a home business that increases the design flow to the property. There are cases in which flows from an outbuilding may be deemed incidental, and would not constitute an increase in design flow to the property. Examples would be the installation of a convenience ½-bath (toilet & sink) in a detached garage or a pool-house cabana.

On residential properties only, requests made to tie a new building into an existing non-compliant SSDS may be approved, but information on the proposed discharge and existing SSDS must first be evaluated. In cases where the proposed discharge is deemed incidental or minimal, and is determined that it will not compromise the existing SSDS, then the exception may be granted. However, when a substantial flow increase (such as an additional bedroom) is being proposed, then an upgrade of the SSDS would likely be required to obtain the central system approval. The replacement of single compartment septic tanks will also be required whenever there is an increase in the design flow to the SSDS.

Please note that this Department can consider exception requests for systems serving more than two buildings, and that central system exceptions are only granted when the buildings served are located on the same lot. Although this Department can consider a central system exception for a primary residential building and a secondary/ancillary residential building, such as a guest house or in-law apartment, we cannot consider a shared SSDS that serves two or more non-associated residential buildings as this would constitute a community sewerage system under the jurisdiction of the Department of Energy and Environmental Protection.

Attachment: Central Sewage System Exception Application

cc: Suzanne Blancaflor, MS, MPH, Chief, Environmental Health Section, DPH
Ellen Blaschinski, MBA, RS, Chief, Regulatory Services Branch, DPH
Code Advisory Committee