



# COMMONWEALTH of VIRGINIA

ROBERT B. STROUBE, M.D., M.P.H.  
STATE HEALTH COMMISSIONER

Department of Health

P. O. BOX 2448  
RICHMOND, VA 23218  
May 17, 1994

## MEMORANDUM

GMP #49

To: District Directors  
Environmental Health Managers  
Environmental Health Supervisors  
Environmental Health Specialists

From: Donald J. Alexander, Director *Donald J. Alexander*  
Division of Onsite Sewage and Water Services

SUBJECT: Old Sand Filter Systems Which Do Not Discharge Which  
Were Permitted Under LHS-120 Permits Or Constructed  
Before Permits Were Required  
**Discharge - Existing Systems/LHS 120 - Enforcement**

After the adoption of the Alternative Discharging Sewage Treatment System Regulations for Individual Single Family Dwellings, certain implementation and enforcement issues were identified by several local health departments. A Discharge Task Force was created to address those issues. This GMP is a result of the task force's efforts.

Unlined sand filter systems with flows  $\leq$  1000 gpd permitted under LHS-120 permits or systems constructed before permits were required, may not have been designed to normally have a discharge. Those systems having a discharge by design will be handled under GMP #48. Systems designed with "tail ditches" or other means to dispose of effluent via discharge to a subsurface system shall be considered an onsite system. As long as they continue to function safely, the Department should not require the owners of these systems to comply with the Alternative Discharging Sewage Treatment Regulations for Single Family Dwellings (Discharge Regulations).

These systems do not need to be inspected unless a complaint is filed. If substantial repairs or modifications are needed to address a public health threat, then the district environmental health program manager will determine, based on a thorough assessment of site and soil conditions, whether the repair should fall under the Sewage Handling and Disposal Regulations or the Discharge Regulations. If the best option for repair is a

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discharging system, then the local health department will notify the owner of the requirement to register under the General Permit and will assist the owner in obtaining the necessary permits.

pc: Office of Environmental Health Services  
Cal M. Sawyer, Ph.D.

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