

**Virginia Department of Health (VDH)
Sewage Handling and Disposal Regulations
Installation and Inspection – Revisions Subgroup**

Date: June 15, 2022
Time: 1:00 pm
Location: WebEx virtual meeting

Attendees:

David Tiller – VDH Office of Environmental Health Services (OEHS)
Anne Powell – VDH OEHS
Anthony Creech – VDH OEHS
Andrew Carter – Chickahominy Health District
John Sawdy – Licensed Onsite Soil Evaluator (OSE), Licensed Onsite Sewage System (OSS) Installer,
Licensed Onsite Sewage System (OSS) Operator
Curtis Moore – Virginia Onsite Wastewater Recycling Association (VOWRA)
Joshua Anderson – Loudoun County Health Department (LCHD)
Ryan Fincham – LCHD
Josh Hepner – LCHD
Matt Tolley – Licensed Onsite Soil Evaluator (OSE), Certified Professional Soil Scientist (CPSS)
Danna Revis – Licensed OSE, Licensed Onsite Sewage System Operator
Tom Ashton – Licensed OSE, Certified Professional Soil Scientist
Philip Brown – Virginia Cooperative Extension / Virginia Tech
Bill Timmins – Sewage Handling and Disposal Advisory Committee (SHADAC) member

1. Welcome / Brief Introductions

Each attendee introduced themselves to the group.

2. Follow-Up from May’s Meeting (notes posted to Town Hall)

Dave Tiller asked the group if there are any questions or comments regarding the meeting summary from the May meeting. No comments from the group.

3. Notifying the HD about installation

Dave Tiller began discussion about GMP 2017-01 regarding notification of VDH about the installation of an onsite sewage system (OSS). What barriers are preventing this from happening? And what could VDH include in regulation to make this happen?

Andrew Carter – installers became accustomed to not calling LHD for OSE-designed jobs. Part of the issue is the weight of “policy” versus “regulation.” Communication with contractors is key. Make sure LHD shows up when the contractor makes the effort to call. Chickahominy keeps an internal tracking record of jobs, notification, and inspection (or waive inspection).

Dave Tiller – is anyone aware of an instance when the LHD withheld the Operation Permit because the contractor did not notify LHD about installation?

Andrew Carter – I am not aware of an instance like this, but I do know of plenty “after-the-fact” inspections in his LHD.

John Sawdy – it might help installers if there was a dedicated email or phone number or person to contact about the installation. His company leaves voicemails for the LHD about installations and never hears back.

Curtis Moore – would a forward-facing database help with this? An online portal?

Danna Revis – lower-tech solution would be to create a phone list of VDH and LHD points of contact

Curtis Moore – that point of contact list could be made easily available on the VDH webpage

Dave Tiller – this group previously agreed that an open ditch inspection is the way to proceed. Does this need to be in the regulations?

Curtis Moore – if there is no penalty for not doing it, don't make it a rule. If there's not going to be any enforcement on an issue, don't put it in the regulations.

Curtis Moore – while open ditch inspection is the best practice, “we” knew 100% inspections wasn't feasible when the GMP was written. The collection of GPS coordinates is a safety net to fall back on.

4. Completion Statements and Inspection Reports - As-Built Drawings (30 minutes)

Dave Tiller - Many reports/statements are submitted to the LHD with the broad statement “installed as designed” or the like.

John Sawdy – it depends on the complexity of the permit; there are always little changes to be expected.

John Sawdy - regarding As-Built drawings, I think a good clean drawing with field measurements should always be submitted as an as-built.

Curtis Moore – inspection statement form

Danna Revis – too many iterations to require specifics in the regulations

Anne Powell – the responsibility for these documents is on the OSE and the installer. These documents are all the owner (and sometimes VDH) have to say what's in the ground. Maybe the regulations should require the submission of these documents while a guidance manual explains the How-To (like Site & Soil subgroup)

Dave Tiller – we want something that lies between “installed as designed” and the exact number of stones in each trench.

Danna Revis – when does the as-built get used – when something goes wrong with the OSS or during property transfer

Dave Tiller – what about contractors/designers withholding completion paperwork until they get paid? The advice was for VDH to not attempt to regulate

Curtis Moore – creating a “start-up” form to use in combination with the “inspection report” for the more detailed AOSSs.

5. VDH’s 4-Point Inspection (30 minutes)

- Location of the OSS
- Proper Treatment
- Depth of Installation
- Capacity of the OSS

Dave Tiller – in a regulation, are these 4 items adequate? More items? Less items?

Andrew Carter – Seems to him like these 4 items need to be more clearly defined/explained

Dave Tiller – asked the group to walk through these 4 items and help elaborate – what is currently in the SHDR for each item?

1. **Location:** measurements to each component of the OSS
2. **Treatment:** make/model of treatment unit and level of treatment it achieves, disinfection
3. **Depth:** adequate fall through components, absorption area installation depth
4. **Capacity:** septic tank size, treatment unit size (if applicable), distribution box ports, square footage of absorption area

6. Final Grade Inspection (15 minutes)

Andy Carter – in favor of leaving final grade up to the local building department

7. Underground marker tape requirement (10 minutes)

Curtis Moore – Is it necessary to protect public health and the environment? Or is it just best practice?

8. Next Steps for Subgroup / Preparation for Next Meeting (5 minutes)

Dave Tiller – is there anything this group thinks should be included in a Fast Track regulation change versus waiting 3-5 years for the full regulation revision process?

Curtis Moore – a better septic tank standard