

# CT Subsurface Sewage Disposal System (SSDS) Survey

**Goal:** To gather stakeholder feedback on proposed changes to training requirements, technical standards, development, and environmental protections for SSDS in Connecticut.

## Section 1: Training & Personnel Requirements

*Objective: Establish mandatory, standardized certification and field protocols.*

### 1. Codification of Training (May not be needed if the intention was not to delete it)

To ensure consistency and legal standing, do you support formally codifying Phase 1 and Phase 2 training requirements within the Connecticut Public Health Code?

- Support
- Oppose
- Other: \_\_\_\_\_

### 2. Mandatory Soil and Field Training

Should soil morphology and field-based training be a prerequisite for maintaining an active Sanitarian's or Inspector's certification?

- Yes, mandatory annually
- Yes, mandatory every 2–3 years (align with certification cycle)
- Yes, mandatory to obtain initial certification
- No, should remain voluntary
- Other: \_\_\_\_\_

### 3. Continuing Education Units (CEUs)

Do you support a mandatory continuing education requirement for certified individuals?

- Yes, mandatory annually
- Yes, mandatory every 2–3 years (with specific credit hours)
- No, should remain voluntary
- Other: \_\_\_\_\_

### 4. Soil Scientist Involvement

At what threshold or "trigger" should a certified Soil Scientist be required to assist the local official? (Select all that apply)

- Any system with design flows over \_\_\_\_\_ GPD (e.g., 2,000 GPD)
- Only in "Areas of Special Concern" or mapped sensitive soils
- For any Alternative Technology (AT) installation

- When the Sanitarian determines that technical complexities (repair/extension) exceed local capacity
- Other: \_\_\_\_\_

## Section 2: Technical Standards & Governance

*Objective: Improve communication and accountability between DPH, CAC, and Local Health.*

5. Future Role and Transparency of the Codes Advisory Committee (CAC) The CAC currently serves in an advisory capacity. How should the committee's structure, authority, and transparency be managed moving forward? (Select one)

- Formalize & Publicize: Codify the CAC role formally and post all meeting minutes publicly.
- Administrative Formalization: Keep the role advisory, but have the DPH formalize the process administratively.
- Restructure: Transition the CAC framework to a Codes and Standards Committee (similar to the Building Department model).
- Maintain Current Status: Keep the existing advisory status and internal processes.
- Other: \_\_\_\_\_

### 6. Legal Accountability & Consistency

Should the DPH maintain a shared, searchable database of "Final Decisions" and legal challenge outcomes to ensure all towns apply regulations consistently?

- Yes, transparency prevents conflicting local rulings.
- No, decisions should be handled on a case-by-case basis.
- Other: \_\_\_\_\_

### 7. Simplified Appeals Process

Would you support a simplified appeal process for technical disagreements that allows for a resolution without the formal issuance of a "Final Decision" or "Order"?

- Yes
- No
- Undecided
- Other: \_\_\_\_\_

## Section 3: Sensitive Areas & Environmental Impact.

*Objective: Defining criteria for nitrogen-sensitive and climate-vulnerable projects.*

### 8. Nitrogen-Sensitive Areas

How should "Nitrogen-Sensitive Areas" be identified for the purpose of stricter SSDS standards?  
(Select all that apply)

- Proximity to public drinking water wells or reservoirs
- Coastal zones (Long Island Sound nitrogen-loading concerns)
- High-density inland areas with documented groundwater impairment
- Waterfront properties (lakes, rivers, or open watercourses)
- Other: \_\_\_\_\_

#### 9. Climate Change & Vertical Separation

In response to fluctuating groundwater levels and sea-level rise, should the state re-evaluate the current 18"-24" minimum vertical separation distance?

- Yes, the current separation is adequate, but needs better enforcement.
- A formal study is needed to adjust standards for future groundwater rise.
- Require groundwater monitoring during high-tide cycles for new applications in coastal zones.
- No, current separation distances are sufficient.
- Other: \_\_\_\_\_

#### Section 4: B100a & Flow Increases

*Objective: Clarifying the assessment process for changes in use and large flow increases.*

#### 10. Defining "Significant Increase" (Nitrogen-Sensitive Areas)

For B100a reviews in Nitrogen-Sensitive areas, what increase in design flow should trigger a full code-compliant assessment? (including hydraulics and 100% reserve area)

- 2,000 GPD and over
- 5,000 GPD and over
- Any increase in flow, regardless of GPD
- Not needed
- Other: \_\_\_\_\_

#### Section 5: Staffing & Resources

#### 11. Agency Staffing Support

Do you support increasing dedicated staffing and funding for the following departments? (Select all that apply)

Program Area	Support DPH Increase	Support DEEP Increase
Training & Certification Programs	[ ]	[ ]
Large/Community System Reviews	[ ]	[ ]
Alternative Technology (AT) Programs	[ ]	[ ]
Codes & Standards Development	[ ]	[ ]

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### General Feedback

Technical Interpretation:

The Public Health Code mentions that a project "may require a study of the capacity of the surrounding natural soil to absorb or disperse the expected volume of sewage effluent without overflow, breakout, or detrimental effect on ground or surface waters."

In your professional opinion, how should "detrimental effect" be defined or measured in the field?

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