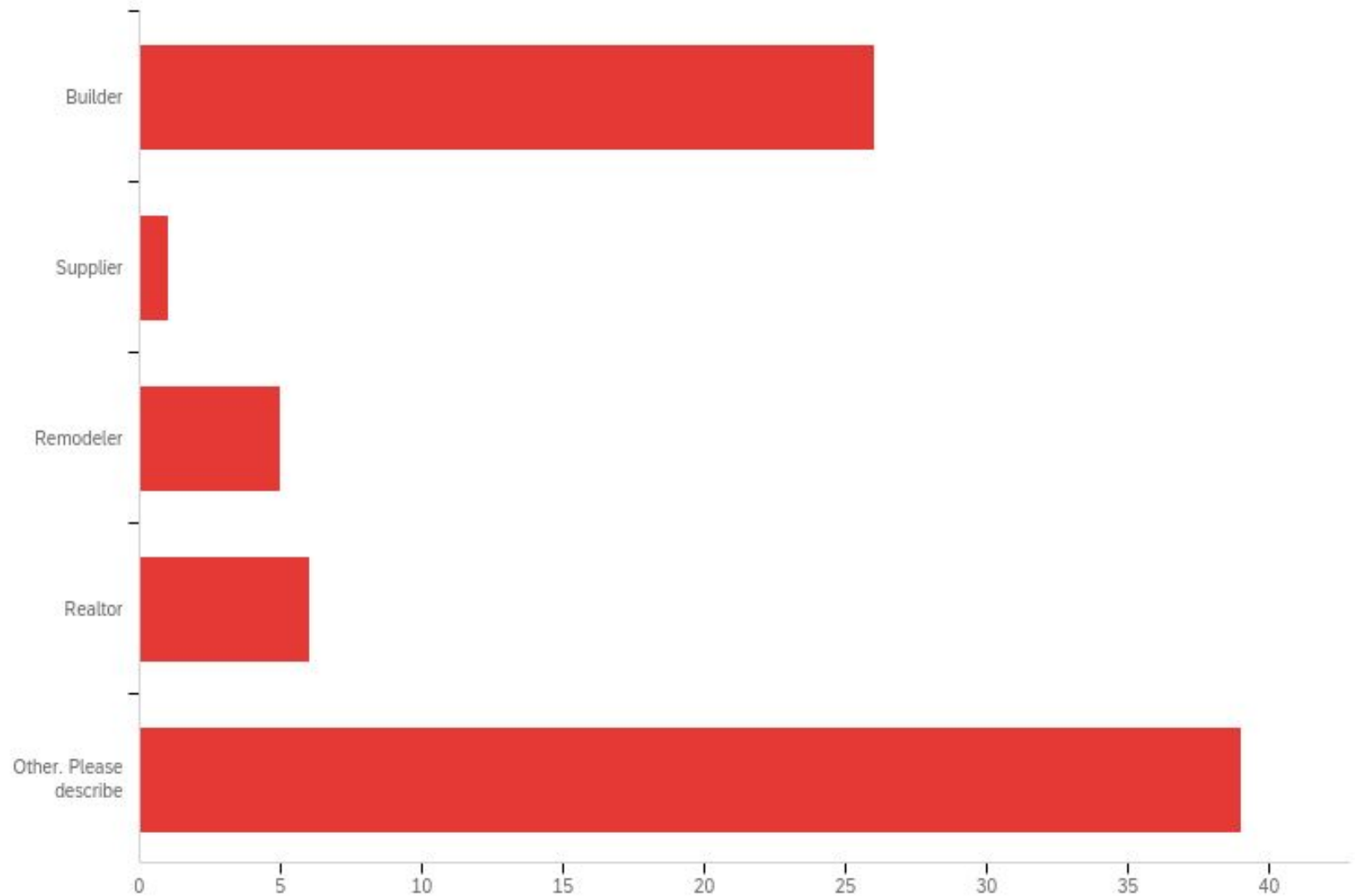


Maryland Building Industry Onsite Wastewater Needs Survey

October 7th 2021

1. What is your role in Maryland's building industry? Check all that apply.

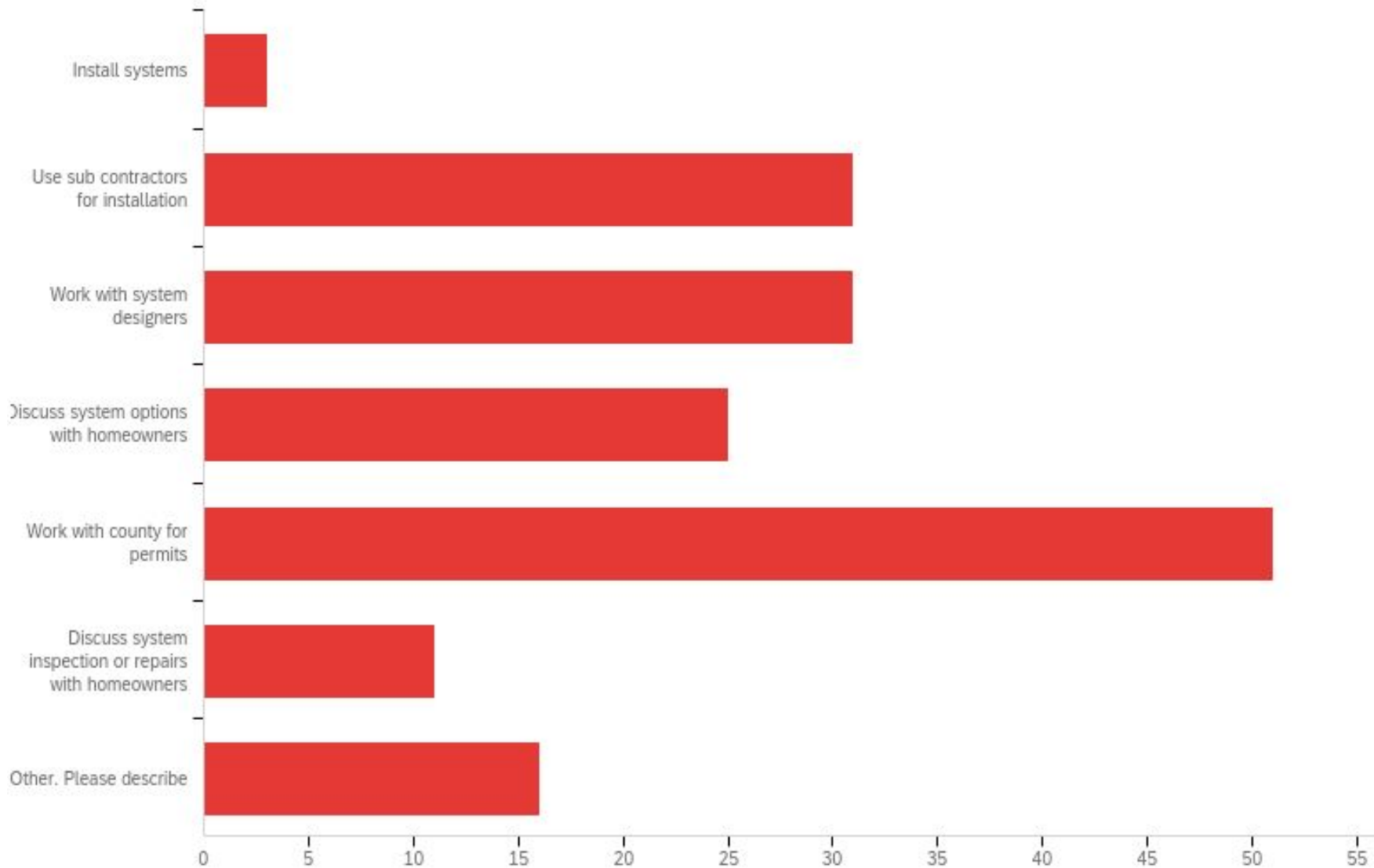


1. What is your role in Maryland's building industry?

OTHER:

Role	Frequency
Attorney	2
Consultant	3
Designer	3
Developer	9
Engineer	15
Homeowner	1
Installer	2

2. In what ways are you involved with the installation and/or approval of onsite wastewater or septic systems? Check all that apply.



2. In what ways are you involved with the installation and/or approval of onsite wastewater or septic systems?

Other.

Proposed well & septic for subdivision development

Design systems (5)

Work with BRF and other grand programs. Work on septic to sewer conversions, including to generate nutrient credits.

Perc testing and system design

environmental regulation

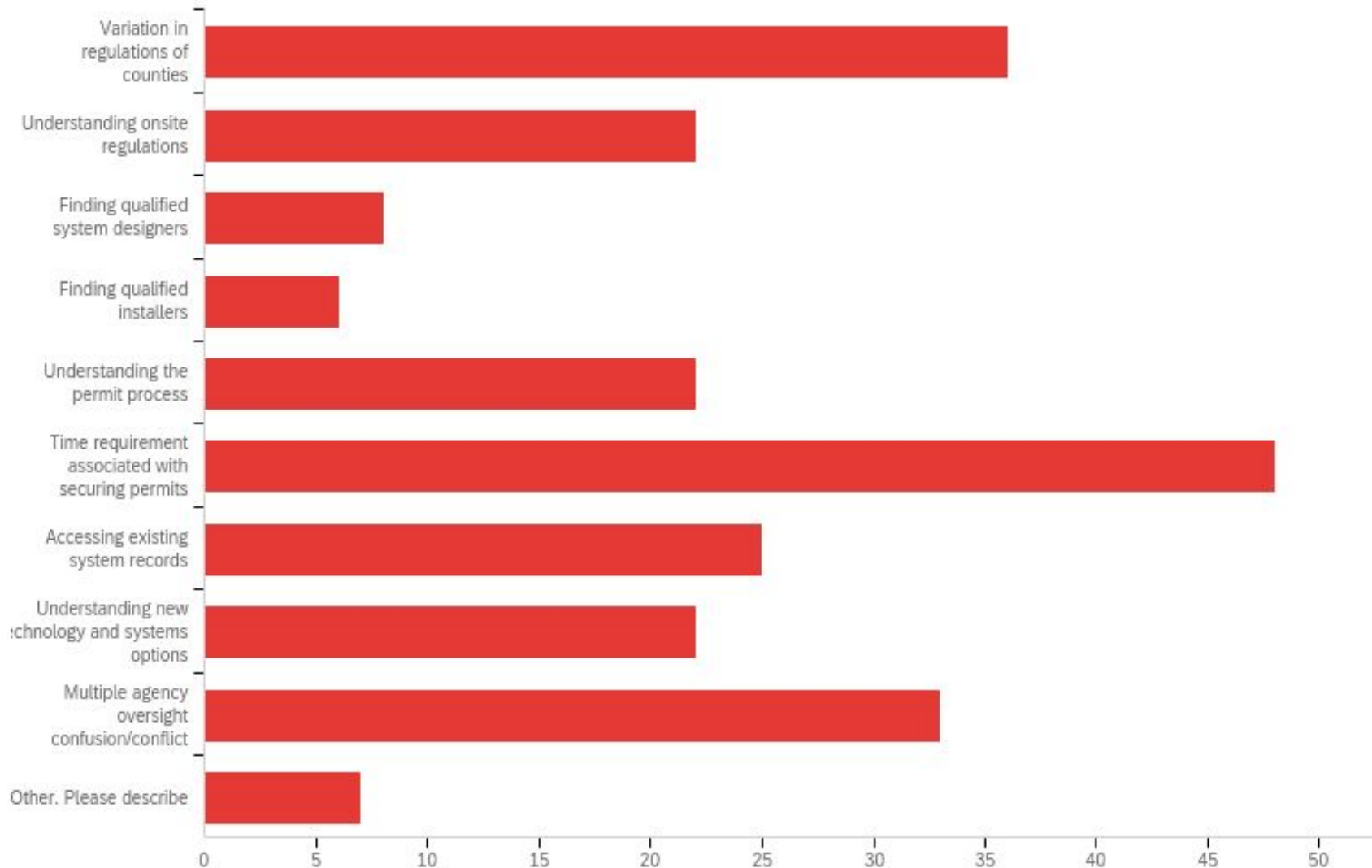
I prepare and procure approval of septic designs through the local health departments and MDE.

personally have a septic system

Create subdivision plats; observe percolation testing

Design and Permitting

3. What are the greatest issues you experience with onsite systems? Check all that apply.



3. What are the greatest issues you experience with onsite systems? Check all that apply.

Other. Please describe - Text

Difficult working with County utilities to get permitting for water or sewerage connections as ecosensitive alternatives

Varying interpretation of the regulations between plan reviewers

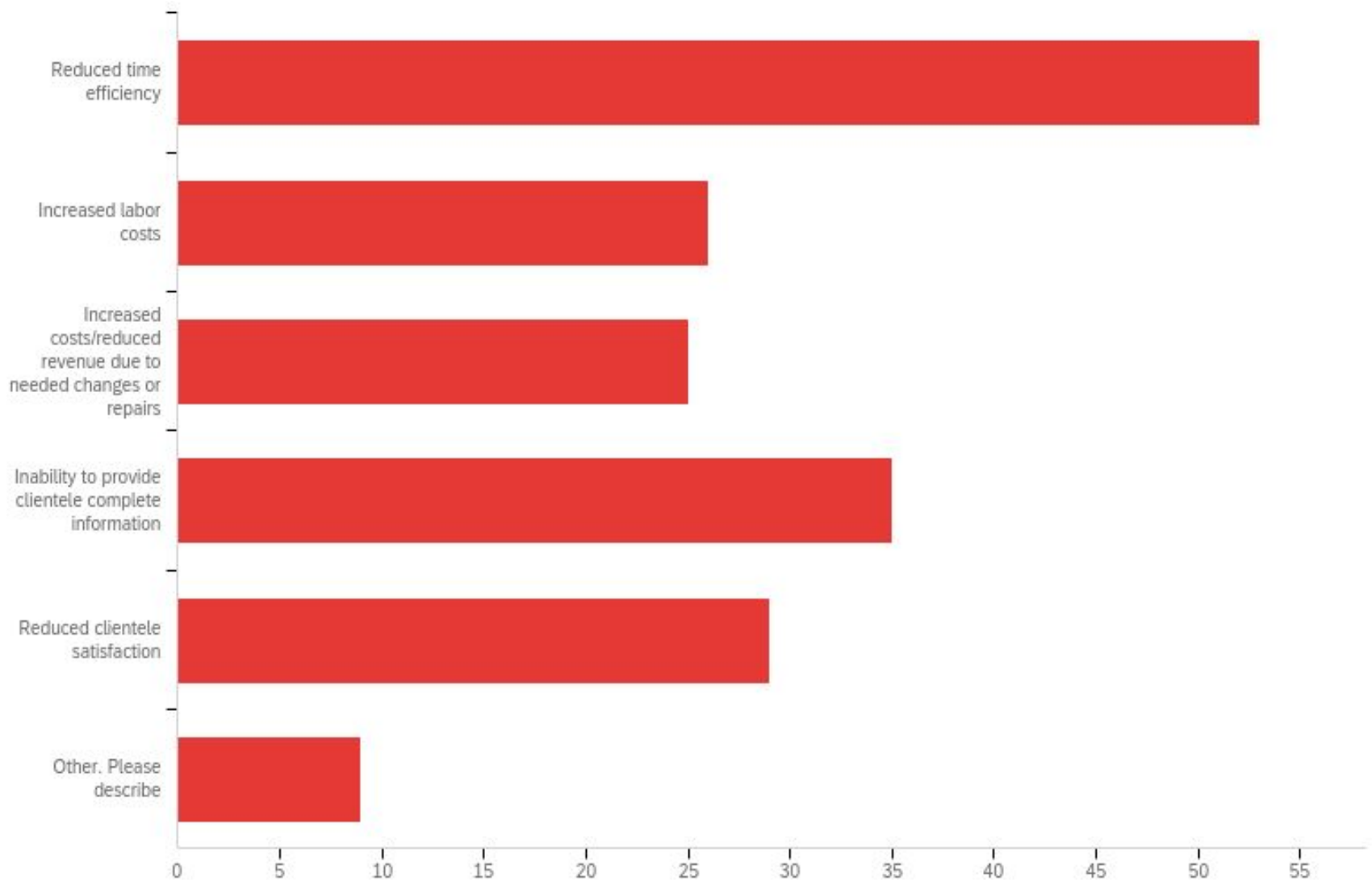
Excessive review times, inconsistent reviews within same department, Covid-19 impacts on staffing

I don't want to do any more well and septic. Too expensive and too much brain surgery.

We do very few of these systems, no problems to report

Cost to developer

4. How do these issues impact your business? Check all that apply.



4. How do these issues impact your business? Check all that apply.

Other. Please describe - Text

Very long delays in completing s, occupancies and more expensive housing.

Staff burn-out/fatigue

ROI and efficiency concerns of newest septic requirements

Additional review submissions

Restrictions on where and to what extent the systems can be installed reduce business and growth opportunities for our business (consulting).

As an attorney assisting property owners and developers in navigating these requirements, these issues positively impact my business.

No issue for us

Fewer projects due to cost of system

5. How would you describe the variation in review of septic systems across counties?

Please describe - Text

Inconsistency in interpretation of MDE Rules/standards from County to County. Individual County discretion on interpretation.

no two counties are alike in their interpretation of the state code

On-Site system design should not be a surrogate for Land Use control. The variability of replacement (reserve) area is inconsistent from jurisdiction to jurisdiction.

Some Counties do inspections at several stages of the install (Layout, open trench, and pre-backfill) Most just do pre-backfill. And, one has the plumbing inspectors do the inspections and they barely look at the system.

may be due to soil types

variation in number of perc tests required and how the results are applied, policies for perc testing for repairs vary

One county allows something that another county does not allow. The one county has a much better record retrieval system than the other

Plan interpretation of what is a bedroom. Setbacks from septic field and downgrade water well

Please describe - Text

Some jurisdictions are more integrated with the DPZ process.....and some aren't. Also, standards like a well box vs three well locations are not consistent.

Some Counties have the Health Department report/structured under the County Executive while others have the Health Department report to the State

This is a 100% true story. After many years working as a developer in Howard County on well and septic jobs, I had one in Anne Arundel County. Based on my own experiences and innumerable similar reports/stories from others, I expected all health departments to be as hostile, unproductive and unhelpful as Howard County's. But, the experience was so shockingly different, I literally stopped the Anne Arundel County Environmental Health staff person to ask them why they were being helpful! After some discussion, it became clear that the focus on "customer service" was a clear mandate for all Anne Arundel County employees that was an enforced/encouraged by the County Executive. It is noted that there is a similar focus on "customer service" among Howard County employees including the County Departments involved in the permitting of development projects (DPW and DPZ) and that focus is consistently enforced/encouraged by the Howard County Executive. But, unlike DPW and DPZ in Howard County and Environmental Health staff in Anne Arundel County, the Environmental Health staff in Howard County do not report to the County Executive. Instead, they report to the State Health Department where the concerns of engineers and developers about delays in the County's plan permitting process being caused by unhelpful and uncooperative staff are (understandably) a lower priority than issues like hospital safety, vaccine roll-outs and food safety. The Howard County Environmental Health Department is deeply integrated with the County's Departments of Planning, Zoning and Public Works yet they have demonstrated (for years) a willful disregard of the norms and expectations of the system in which they operate. In general, I believe the current staff at Howard County's Environmental Health Department are competent and capable. But, they shouldn't continue operating (as they do now) without the same expectations other agencies involved in County-level permitting processes. Anne Arundel County's Environmental Health Department reports to the County Executive and Howard County's should as well.

Please describe - Text

Health Departments have varying processes and methods of approval and systems they generally approve. A standard process should be generated for the entire state since the Health Department is the approving authority.

Some counties take too long to review designs (short-staffed?) while others are more lenient and in system design than others. Some counties go by COMAR regs exclusively while others have their own more-restrictive design criteria.

Time and regulations vary greatly. Some jurisdictions design the systems others rely on the consultant

Varies

Howard used to be more flexible with innovative systems but it has been a few years since I processed a permit there. If MDE becomes involved it is much more difficult and time-consuming to get through the review process.

Different jurisdictions have different requirements for pipe bedding, testing, backfill material and type of vaults.

all over the board.

Please describe - Text

Testing very different between Baltimore, Carroll and Harford.

County Specific Tank/trench/system requirements

Confusion in what the state allows and what county says is allowable.

I work mostly in Howard County, but the few other counties seem to have similar regulations.

It seems review variation is related to reviewer's personal interpretation of regulations.

Each county seems to have their own individual hot buttons when reviewing septic designs for lots.

There are variants in design preferences and code throughout the state. Some Counties have created manuals such as Anne Arundel (which needs to be updated), and some have unwritten policies.

Some counties are much more stringent than others. Some counties are willing to work with us when we have a situation where a creative solution is needed.

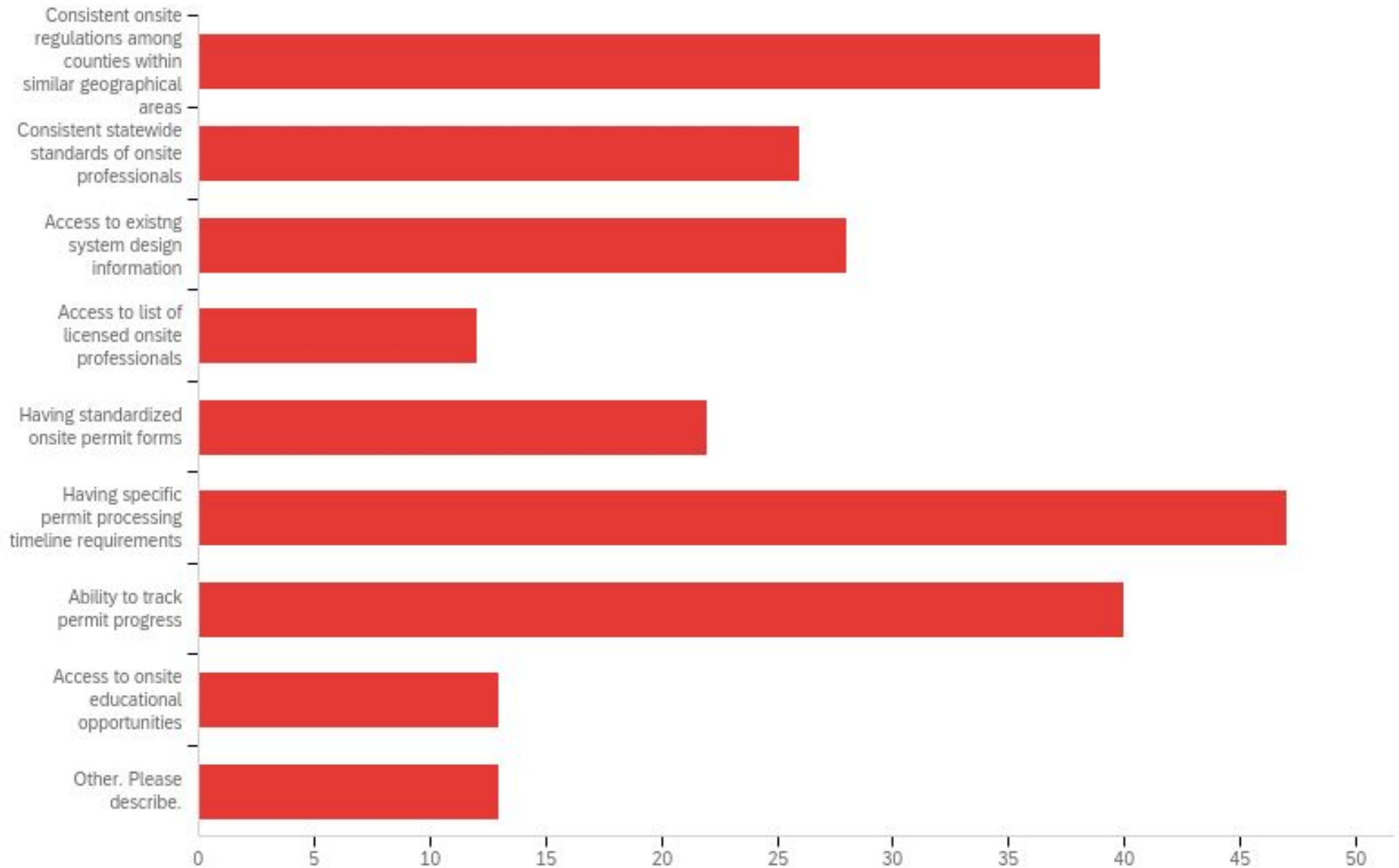
6. Which county(s) have you observed to be relatively easy to get a septic permit?

County	Frequency
Anne Arundel	4
Baltimore	2
Carroll	2
Cecil	2
Frederick	2
Harford	2
Howard	2
Montgomery	4
Eastern Shore	1
Western MD	2
None	11

7. Which county(s) have you observed to be difficult to get a septic permit?

County	Frequency
Anne Arundel	5
Baltimore	6
Carroll	4
Cecil	1
Frederick	5
Harford	1
Howard	12
Montgomery	9
Prince George's	3
St. Mary's	1
Washington	2
Wicomico	1

8. What changes or ideas do you think would be helpful in reducing issues? Check all that apply.



8. What changes or ideas do you think would be helpful in reducing issues?

Other. Please describe. - Text

Not increasing bureaucracy to implement statewide uniformity.

Prior notice before enforcement of a new or prior unenforced regulation.

I don't believe, given the variability across the state and even within a jurisdiction, that consistent on-site regulations are advisable.

Better educated designers and installers

Educational opportunities for plan reviewers as well to promote accurate application of State regulations.

The Howard County Environmental Health Department is deeply integrated with the County's Departments of Planning, Zoning and Public Works yet they have demonstrated (for years) a willful disregard of the norms and expectations of the system in which they operate. In general, I believe the current staff at Howard County's Environmental Health Department are competent and capable. But, they shouldn't continue operating (as they do now) without the same expectations other agencies involved in County-level permitting processes. Anne Arundel County's Environmental Health Department reports to the County Executive and Howard County's should as well.

Revise water usage per bedroom. The amount of water per bedroom or person is very antiquated. The low flow showers, toilets and faucets means much less water is produced than the amount set by the state.

8. What changes or ideas do you think would be helpful in reducing issues?

Other. Please describe. - Text

MOWPA (Maryland Onsite Wastewater Professional Assoc) used to have an Technical Educational Program.

stop multiple rounds of agency comments. owner submits plan. receives and addresses agency comments. agency approves plan.

AA Co requires 2 review processes. Initially, a request for design based on the size of the house is required, which takes 3 weeks, then the plan is designed and submitted which takes 4 weeks and then a grading permit is required.

Consistent interpretation

More flexibility at the county level for creative solutions

I do not think that one system would work for the entire state since there are differences in soil types and topography. Different solutions may be best practices