



Summary of Changes to On-Site Wastewater Treatment System Regulations

The Water Quality Control Division (WQCD) provided comments in three primary areas where the Broomfield draft regulation needs correction to ensure consistency with the OWTS Act and Regulation 43:

- **Design Criteria Clarification (Section 1.3(B)(1)):** The current language requiring all designs to use TL-1 parameters had to be updated to include the exceptions found in Section 43.11(A)(3)(a) (specifically for unlined sand filters and mounded systems), which allow for different application rates without a mandatory O and M program.
- **Personnel Consistency (Section 1.10(A)(1)):** There is a conflict between the main text and Appendix A regarding who observes soil profile test pits. The main text currently requires observation by both a professional engineer and a technician, while Appendix A suggests it can be either or. The language was updated from “and” to “or”.
- **Acronym Definitions:** The abbreviation CDPHE must be defined upon its first occurrence. The full title, “Colorado Department of Public Health and Environment,” was added to precede the use of the acronym.

Recommendations from WQCD:

- **Reference Citations (Section 1.4(A)(2)):** For better user navigation, it is recommended to include a direct citation to Section 43.4(B)(3). This section was added to help permit applicants locate the specific state requirements more efficiently.