



NC DEPARTMENT OF
**HEALTH AND
HUMAN SERVICES**

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Division of Public Health

January 29, 2020

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Rowan County Environmental Health
402 North Main Street
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In December of 2019 and January of 2020, the On-site Water Protection Branch, Environmental Health Section, completed review of the Rowan County Health Department, On-site Water Protection program. Kevin Neal and I enjoyed working with you and your staff. Staffing challenges dictated that this review did not follow the traditional format, as you have recently agreed to serve as director, Jeff Link has returned after retiring to work part time, and other staff work on a contractual basis.

This review evaluated a sub-set of the documentation evaluated during a typical review, and included the work of Rob Nations, Jeff Link, Shane Walker, and Matt Lamb.

On-Site Water Protection Program: We reviewed soil and site evaluations, Improvement Permits, Construction Authorizations, Operation Permits, Notices of Violation, Repair Permits, and Denial letters. We visited selected sites to compare and confirm staff documentation. The following summarizes our discussions of areas needing attention and their corrections:

Forms:

- a. The county uses CDP software to generate Improvement Permits, Construction Authorizations, and Operation Permits. Permits generated using this software contain all the required information, however many files reviewed did not include these forms. If alternate forms are to be used pending the authorization of permanent staff, these must be evaluated to ensure they contain all required information. Samples are available upon request, and I would be glad to review any being considered.
- b. Files reviewed which contain only an "Operation Checklist", contain only a Construction Authorization, lack soil notes, or lack signatures are considered incomplete. A list of these files is attached for correction.

Site evaluation:

- a. Document the location of each auger boring/backhoe pit.
- b. Document percent slope for each auger boring/backhoe pit and calculate slope correction when determining maximum trench depth.
- c. Be sure that the soil evaluation supports the maximum trench depth designated on the permit.
- d. Make sure soil sheets are complete.
- e. Consider the presence of the transitional, or BC horizon when determining LTAR and maximum trench depth.

Permitting:

- f. Tie down the approved soil area(s) and proposed structure with measurements from fixed reference points.
- g. An increase in wastewater flow requires that repair area be designated for the additional flow.
- h. An Improvement Permit must include a site plan. This permit can be conditioned to require activities such as submission of a survey prior to issuance of the Construction Authorization.
- i. A change in flow, drain field location, etc. on a site with an existing permit requires a new application and site plan and revocation of the existing permit prior to issuance of the new permit. The voluntary revocation form

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provided can be used when the owner wishes to waive their appeal rights and receive their new permit immediately.

- j. A system can only be evaluated for repair if it meets the criteria of a malfunctioning system as described in Rule .1961.

System Monitoring and Maintenance Program: Rowan County does not currently have an Operation and Maintenance program. An updated list of large/IPWW systems for Rowan County is included to begin inventory and inspection of these facilities. The UIC tab of the monthly report was reviewed for submission of system data. Begin implementation of O&M as required in Rule .1961 with an emphasis on these systems, including other systems as staffing resources allow.

Migrant Housing Program: The migrant housing program in Rowan County was reviewed and is in compliance.

Private Drinking Water Well Program: An abbreviated review of the well program was conducted. Use of the well permitting decision tool was reviewed with multiple staff to screen well sites prior to permitting, and instructions were provided. The newest HRE forms are included with this report. Please consider the following: Permit a well "area" when possible and define the dimensions and location of this area with measurements from fixed reference points. Be sure and track efforts to contact owners of new wells for water samples.

Given current staff vacancies, I recommend that the program have an interim review in one year or once new staff are in place to assess the implementation of corrections and identify areas for improvement.

If you agree with summary of our visits and implementation of the corrections as discussed, please indicate with your signature below. If you have any questions, please contact me at (910)974-0444.



Teresa Davis, Regional Specialist
NC DHHS, OSWP

cc. Kevin Neal
John Brooks
Wilson Mize

Gene Young, Supervisor
Rowan County Environmental Health