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Division of Public Health

April 14, 2023

Adrian Pruett, Manager Rowan County Environmental Health 402 North Main Street Salisbury, North Carolina 28144

Dear Adrian,

In April of 2023 I completed an interim review of the Rowan County Onsite Water Protection Program at your request. I enjoyed my visit with you all and appreciate your openness to feedback and suggestions. This review was an abbreviated version of a scheduled program review and included samples of your work, as well as that of Randy Swicegood, Program Specialist, Caleb Link, Tucker Osborne, Jason Koontz, and Jake Ward. All staff have been hired since the last review in 2020. The department has one vacant position.

A review of the 2020 report shows that all issues, including those with applications, documentation of site evaluations, completeness of permits, and procedures have been corrected. Staff frequently consult in the office and field on challenging sites. Documentation of conversations with applicants and owners is included within the files and the applicant/owner signs all permits at time of issuance. Field layouts of systems were observed during site visits.

On-Site Water Protection Program: The review included soil and site evaluations, Improvement Permits, Construction Authorizations, Operation Permits, Repair Permits, and Denial letters. We visited selected sites to compare and confirm staff documentation. Please consider the following reminders discussed during our visit:

- 1. Determine the repair system types at the time of Improvement Permit issuance, completing layouts of the repair system when needed to verify available space.
- 2. When documenting low-chroma colors that are not unsuitable, use terms such as "redoximorphic features" which reference back to a specific rule.
- 3. Include maximum occupancy on the Improvement Permit/Construction Authorization/Operation Permit.
- 4. Include sufficient measurements on GPS drawings to make them accessible to others. Create artificial benchmarks when needed and condition the IP/CA that these benchmarks remain in place through OP issuance. Measurements must be easily reproduced in the field and avoid diagonal measurements when possible. Make sure the approved system area is tied down independently of the house location. Include the footprint of the proposed structure and note property line lengths.
- 5. Account for steps and other entrances even when the applicant fails to note these on their site plan.
- 6. Include the repair area with dimensions on all Operation Permits.

System Monitoring and Maintenance Program: Rowan County does not currently have an Operation and Maintenance program. A list of large systems was provided for review and updates. Work towards implementation of O&M with a focus on these large systems as staff resources allow.

Thank you again for the opportunity to visit with you and your staff. If you have any questions, please contact me at (910)974-0444.

Teresa Davis, Regional Specialist DHHS, OSWP

cc. Alyssa Harris, RCHD Scott Greene, DHHS Jon Fowlkes, DHHS Larry Michael, DHHS