## Brown County Health Department

## Standard Operating Procedures Septic



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## Index

Permits		. 3
Installation	for On-site Sewage Disposal Systems	.5
	Gravity Systems	.5
	Flood Dosed Systems	6
	Mound Systems	
	Subsurface Sand Lined Systems	
	Subsurface Drainage	
	Elevated Sand Lined Systems	
	eplace	
Technology	New to Indiana (TNI)	.12
Inspections		.13
	Gravity Systems	. 13
	Flood Dosed Systems	
	Mound Systems	. 17
	Subsurface Sand Lined Systems	.18
	Subsurface Drainage	
	Elevated Sand Lined Systems	.20
	Backfill Inspection Form Sand Lined	.21
	Backfill Inspection Form Trench	. 23
Changes of	Use: Authorization to Access Property	. 25
Notice of P	ossible Violations	. 27
Complaint:	Authorization to Access Property	. 28
	Residential Onsite System Report Sand Lined Inspection Form	.32
	Residential Onsite System Report Trench Inspection Form	.38
Tourist Hor	nes & Bed and Breakfast	45
Registration	n for Installers	46
Penalties		47
Administra	tive Appeals	.48
Wastewate	r Disposal Failures	.50
Pump and I	Haul	.51
SOP Annua	l Reviews	53

#### **Permits**

The following documents, on the appropriate forms, are required prior to issuance of a septic permit.

- 1. Application/Affidavit
- 2. Warranty Deed
- 3. Complete Set Floor Plans including Elevation
- 4. Plot Plan of Site
- 5. Contractors Septic System Design Drawing which must contain:
  - a. North indicator
  - b. Location of house and any other structures
  - c. Ponds, lakes, streams, ditches
  - d. Driveway and trees greater than 12" in diameter
  - e. Existing grade elevation
  - f. Distance to property boundaries
  - g. Soil boring location
  - h. Water line/well
  - i. If the system design is required to be a pump system, a pump curve chart must be submitted for review.
- 6. EHS Site Evaluation which must contain:
  - a. Date
  - b. Site Location
  - c. Contractor
  - d. Description of site: general, slope, contour
  - e. Notes on recommendations or of unusual condition, if needed
  - f. An EHS site diagram/drawing, oriented toward North, of the proposed absorption field as laid out and flagged by contractor as it relates to the entire plot
- 7. If applicable, 100 year flood elevation determination

After all required documentation and on-site work has	s been completed, reviewed, approved by
EHS and verified that Brown County Ordinance	and ISDH 410 IAC 6-8.1 is met, the
permit will be issued to the home owner or home own	ner representative for the appropriate fee.

Note: If the permit issuance is denied, an appeal may be filed under procedures outlined in *Article XI Administrative Appeals*.



#### **BROWN COUNTY HEALTH DEPARTMENT**



#### Steps on how to obtain a septic permit

NOTE: All documents submitted to the health department must be under the property owner's name.

All required documents must be submitted on a maximum 8 ½ x 14" paper.

The health department will provide you with a list of soil scientists and Brown County certified septic installers.

- 1. Contact a registered soil scientist to obtain a soil analysis of your property.
- 2. The soil scientist provides a copy of the soil analysis to the health department.
- 3. The health department creates a spec sheet based on the soil analysis. (This takes 1-2 business days.)
- 4. Call the health department (812-988-2255) for a copy of the spec sheet. You will use the spec sheet to get quotes from septic installers.

Once you've chosen a septic installer, provide the following documents to the health department to apply for a permit:

 Application/Bedroom Affidavit (Completed, signed and dated by the property owner)
 House plans that show bedrooms, baths, kitchen, etc.
 <u>Elevations</u> of the house showing number of stories, basement, etc.
 Property deed (This is at the recorder's office)
 Plot plan (This is at the surveyor's office)
 A layout (drawing) of your septic system provided by your septic installer.

Allow approximately 1 to 2 days for the documents to be reviewed by EHS. Once approved by EHS, you may obtain a septic permit. Call the office and ask the front office personnel if it is ready to be permitted.

The cost of a permit is \$150 for pipe/gravel and \$250 for Presby or mound. Permits are good for one year.

If you believe your septic system is in need of repair, you will still need to contact a septic installer to find out if your system can be repaired or needs to be replaced.

## Installation for On-site Sewage Disposal Systems

Gravity Systems, Flood Dose Systems, Mound Systems, Sub-Surface Sand Lined Systems and Elevated Sand Lined Systems

**Gravity Systems** 



## Flood Dosed Systems



## Mound Systems



## Subsurface Sand Lined Systems



## Subsurface Drainage



## **Elevated Sand Line Systems**



### Repair or Replace

Some septic's are installed very shallow and some are even constructed at ground level and can be damaged very easily.

Landscape plans close to the septic field need to be submitted to the Brown County Department of Health so that we may assist in the placement or excavation so the septic will not be encroached upon.

All septic repairs need to be performed by a Brown County registered installer.

If the septic work is being performed at the tank, a permit might be required. Check with the Brown Department of Health before starting any septic work.

All septic work performed after (behind) the tank will require a permit.

The department will review all options and scenarios with the installer and home owner to try and find a solution for the situation as defined in 410 IAC 6-8.3-53(i).

When another area is available for repair of the septic, a sand lined system may be able to be installed where the existing system is installed if approved and permitted.

The sand lined system must be installed as the manufacturer recommends. No deviation from the manufacturer specifications will be allowed.

Septic failure is clearly defined in the Brown County ordinance and 410 IAC6-8.3-33.

## Technology New to Indiana (TNI)

This article is septic technology that is new to Indiana and is referred to as TNI.

All Indiana State Department of Health TNI is listed on the state web site at in.gov/isdh/23262.htm.

All TNI has to be engineered and approved by ISDH.

The installer that is installing the TNI has to be certified by the product Manufacturer.

All other Brown County and ISDH installation procedures must be followed.

If drip irrigation is being installed the document Indiana Standards for Subsurface Drip Systems, dated December 1, 2009 must be followed.



### Inspections

Complete the Backfill Inspection Report for gravity, flood, dose, mound, subsurface sand or elevated sand lined systems.

#### **Gravity Systems**

The following procedures are to be followed and adherence to state and local codes documented when inspecting gravity fed systems. Inspection findings must be documented on an inspection form at the time of inspection.

- 1. The plastic limit of the soil is to be checked to ensure the system is installed under proper soil conditions.
- 2. Measurement from the home or home site to the septic tank must be taken and documented on the inspection form to ensure proper set back distances have been met and to simplify locating the tank in the future. The septic tank is to be inspected for proper baffles, gas deflector and filter if present. The inlet and outlet connections must be water tight. The septic tank must have a gas tight riser. Measure distance from tank to distribution box. Document findings on inspection form.
- 3. The distribution box or boxes are to be inspected to ensure it is watertight. The inlet pipe should be one inch higher than the outlet pipes. Using a torpedo level ensure the box is installed level. If speed levelers are used, verify calibration with water so each trench receives an equal amount of effluent.
- 4. Inspect the pipe leaving the distribution box going to the header trench. Ensure all pipes have positive fall. If in doubt, confirm fall with the torpedo level. Document, on the inspection form, the type of pipe and ensure the pipe meets state code 410 IAC 6-8.1.
- 5. Ensure pipe going into lateral lines measures at least 7 1/2 feet on center per state code and have 5 feet of solid pipe per Brown County Ordinance.
- 6. Using a 100 foot tape measure, the trenches are to be measured for length, and width. There is to be no more than 10 feet of difference in the length of the trenches. Using a metal or fiber glass soil probe, measure the depth of the trenches, on the down slope side (if applicable), at least twice along the trench length. The trench depth shall not vary more than 4 inches from the depth required on the permit. Per state code, minimum trench depth is 10 inches maximum is 36 inches, and no trench shall exceed 100 feet in length. The square footage is calculated by multiplying trench width by trench length. Record inspection finding on the inspection form.
- 7. The pipe in the laterals is to be installed level throughout the length. Using the torpedo level check the beginning, middle and end of the laterals. Brown County Health Department will allow 2 inches of fall in a 100 foot long lateral. The pipe in the lateral must adhere to the requirements state code 410 IAC 6-8.1 and be documented on the inspection form. All laterals

- must have end caps per Brown County Ordinance. Ensure the proper hole spacing and location. There must be at least 6 inches of aggregate below the pipe and 2 inches of aggregate above the pipe. The aggregate must be free from excessive dust and fines and be 1/2 2 1/2 inches in diameter per state code. The top of the aggregate must be covered with geotextile fabric.
- 8. The perimeter drain, if required, must be installed at the required depth. Measurements must be taken to ensure the drain is no closer than 10 feet to the absorption laterals. The outlet of the perimeter drain must be protected by an animal guard. Document findings on inspection form.
- 9. A diversion ditch may be required to accommodate runoff if the absorption field is located on a slope reference state code for specific requirements. If required, the diversion ditch must be deep and wide enough to accommodate the amount of run off anticipated. The diversion ditch must maintain positive slope.
- 10. In the space provided on the inspection form complete a site sketch, oriented North of the installed septic system, include home or home site, existing roads, ponds, streams or ditches, and structures.

#### Flood Dosed Systems

The following procedures are to be followed and adherence to state and local codes documented when inspecting flood dosed systems. Inspection results must be documented on an inspection form at the time of inspection.

- 1. The plastic limit of the soil is to be checked to ensure the system is installed under proper soil conditions.
- 2. The septic tank is to be inspected for proper baffles, gas deflector and filter if present. The inlet and outlet connections must be water tight. The septic tank must have a gas tight riser. Measurement from the home or home site to the tank must be taken and documented on the inspection form to ensure proper set back distances have been met and to simplify locating the tank in the future.
- 3. The pump chamber must be inspected. The inlet and outlet connections must be water tight. A gas tight riser must be installed. The pump sizing information must be confirmed during inspection to ensure the information submitted is correct and that the proper size pump has been installed. The pump dose must be recorded on the inspection form. If pumping down slope, a ¼ inch deep hole must be drilled into the bottom elbow on the delivery line inside the pump chamber.
- 4. The delivery line must be of state code compliant pipe and installed so that when the pump shuts off the effluent in the line drains either to the pump chamber or the distribution box. Measure distance from the pump chamber to the distribution box.
- 5. The distribution box (es) is to be inspected to ensure the inlet and outlet connections are water tight. An elbow or baffle must be installed on the inlet. A ¼ inch hole must be drilled on the topside of the elbow. The inlet pipe should be one inch higher than the outlet pipes. Using a torpedo level ensure the box is installed level. If speed levelers are used, verify calibration with water so each trench receives an equal amount of effluent.
- 6. Inspect the pipe leaving the distribution box going to the header trench. Document, on the inspection form, the type of pipe and ensure the pipe meets state code 410 IAC 6-8.1.
- 7. Ensure pipe going into lateral lines measures at least 7 1/2 feet on center per state code and have 5 feet of solid pipe per Brown County Ordinance.
- 8. Using a 100 foot tape measure, the trenches are to be measured for length, and width. There is to be no more than 10 feet of difference in the length of the trenches. Using a metal or fiber glass soil probe, measure the depth of the trenches, on the down slope side (if applicable), at least twice along the trench length. The trench depth shall not vary more than 4 inches from the depth required on the permit. Per state code, minimum trench depth is 10 inches maximum is 36 inches, and no trench shall exceed 100 feet in length. The square footage is calculated by multiplying trench width by trench length. Record inspection finding on the inspection form.

- 9. The pipe in the laterals is to be installed level throughout the length. Using the torpedo level check the beginning, middle and end of the laterals. Brown County Health Department will allow 2 inches of fall in a 100 foot long lateral. The pipe in the lateral must adhere to the requirements state code 410 IAC 6-8.1 and be documented on the inspection form. All laterals must have end caps per Brown County Ordinance. Ensure the proper hole spacing and location. There must be at least 6 inches of aggregate below the pipe and 2 inches of aggregate above the pipe. The aggregate must be free from excessive dust and fines and be 1/2 2 1/2 inches in diameter per state code. The top of the aggregate must be covered with geotextile fabric.
- 10. The perimeter drain, if required, must be installed at the required depth. Measurements must be taken to ensure the drain is no closer than 10 feet to the absorption laterals. The outlet of the perimeter drain must be protected by an animal guard. Document findings on inspection form.
- 11. A diversion ditch may be required to accommodate run off if the absorption field is located on a slope reference state code for specific requirements. If required, the diversion ditch must be deep and wide enough to accommodate the amount of runoff anticipated. The diversion ditch must maintain positive slope.
- 12. In the space provided on the inspection form complete a site sketch, oriented North of the installed septic system, include home or home site, existing roads, ponds, streams or ditches, and structures.

#### **Mound Systems**

The following procedures are to be followed and adherence to state and local codes documented when inspecting elevated mound systems. Inspection results must be documented on an inspection form at the time of inspection.

- 1. A certified engineer design plan is required for all mound systems unless otherwise approved. Prior to beginning construction a consultation with the system contractor to determine an inspection schedule would be helpful.
- 2. The plow layer or lift and drop area is to be inspected to ensure the furrow depth is 6-8 inches. The ground must be plowed following the contour of the land. If a chisel plow is used, two passes must be made. The only plow types approved are mold bore plow and a chisel plow. The plowed area must be large enough to accommodate the required square footage of the absorption area.
- 3. The sand or aggregate bed must be inspected and measured to ensure it is uniformly level and of the correct dimensions. Using a probe ensure the aggregate measures 6 inches below the pipe and 2 inches above the pipe. Using a level torpedo level, in at least three locations along the length, ensure the laterals are level. If questionable confirm with the laser level. The installed lateral length shall be as engineer designed but not to exceed 50 feet in length. End caps must have a ¼ inch hole in the 12 o'clock position.
- 4. The septic tank is to be inspected for proper baffles, gas deflector and filter if present. The inlet and outlet connections must be water tight. The septic tank must have a gas tight riser. Measurement from the home or home site to the tank must be taken and documented on the inspection form to ensure proper set back distances have been met and to simplify locating the tank in the future.
- 5. The pump chamber must be inspected. The inlet and outlet connections must be water tight. A gas tight riser must be installed. The pump sizing information must be confirmed during inspection to ensure the information submitted is correct and that the proper size pump has been installed. The pump dose must be recorded on the inspection form. If pumping down slope, a ¼ inch weep hole must be drilled into the bottom elbow on the delivery line inside the pump chamber.
- 6. The delivery line and manifold pipe must meet state code and be properly sized. The delivery line must be installed so that when the pump shuts off the effluent in the line drains either to the pump chamber or the manifold.
- 7. The perimeter drain, if required, must be installed at the required depth. Measurements must be taken to ensure the drain is no closer than 10 feet to the plow layer. The outlet of the perimeter drain must be protected by an animal guard.
- 8. Using a probe, the EHS must ensure proper fill has been applied and graded in a manner that promotes water runoff. The toe slope must be graded at the proper 3:1 (3 inches per 1 foot) ratio. The system must be seeded and strawed or sod applied to prevent erosion.

#### **Subsurface Sand Lined Systems**

The following procedures are to be followed and adherence to state and local codes documented when inspecting subsurface sand lined systems. Inspection results must be documented on an inspection form at the time of inspection.

- 1. The plastic limit of the soil is to be checked to ensure the system is installed under proper soil conditions.
- 2. The septic tank is to be inspected for proper baffles, gas deflector and filter if present. The inlet and outlet connections must be water tight. The septic tank must have a gas tight riser. The septic tank must be installed level. This will be verified with a laser. Measurement from the home or home site to the tank must be taken and documented on the inspection form to ensure proper set back distances have been met and to simplify locating the tank in the future.
- 3. If required the pump chamber must be inspected. The pump chamber must be installed level. This will be verified with a laser. The inlet and outlet connections must be water tight. A gas tight riser must be installed. The pump sizing information must be confirmed during inspection to ensure the information submitted is correct and that the proper size pump has been installed. The pump dose must be recorded on the inspection form. If pumping down slope, a ¼ inch weep hole must be drilled into the bottom elbow on the delivery line inside the pump chamber.
- 4. If required the distribution box (velocity reducer) is to be inspected to ensure water tightness. The inlet pipe is to be one inch higher than the outlet pipe. Using a torpedo level or laser ensure the box is installed level.
- 5. All trees, shrubs and debris must be removed at least ten feet from bed area.
- 6. Inspect the pipe leaving the distribution box. Ensure the pipe has positive fall. If in doubt, confirm fall with a torpedo level or laser.
- 7. Using a 100 foot tape measure, the length, width and depth of the bed is to be measured and is to match the specification sheet. The bottom of bed is to be fluffed, not slick.
- 8. Six inches of sand (Indiana DOT spec 23 sand only) is to be placed and leveled across the bed bottom.
- 9. Piping installed as per manufacturers guidelines.(on contour  $+/-\frac{1}{2}$  inch)
- 10. Three to six inches of sand is to be placed over the piping.
- 11. Four inch raised connections are to be installed as per manufactures guidelines
- 12. Observation port to be installed as per manufacturers guidelines.
- 13. Low air vent is to be installed as per manufacturers' guidelines.
- 14. High vent if applicable is to be installed as per manufacturers' guidelines. (10'verticle separation between low and high vent)
- 15. Six to nine inches of soil is to place over the system. Total material over the pipes shall be a minimum of twelve inches, crowned to promote rain run-off. System side slope tapers shall be no greater than 3 horizontal feet for each one foot of vertical drop. (3 to 1 slope).
- 16. Soils are to be placed only with a low ground pressure trac machine or a shooter truck.
- 17. All areas associated with the SLS installation shall be finish graded, fertilized, seeded and strawed.

#### Subsurface Drainage

- 1. Perimeter drains are to be installed around the entire perimeter of a sand lined system and an elevated sand mound system.
- 2. The drains shall have a separation of ten feet from the septic bed or basil area.
- 3. Segment drains are to be used in multiple bed side by side configuration systems at a twenty foot separation plus the drain width.
- 4. Curtain or interceptor drains are to be installed above a gravity or flood dose systems.
- 5. The drains shall have a separation of ten foot from the upslope lateral line ditch.
- 6. The drain shall be a minimum width of six inches.
- 7. The drain depth shall be determined by the Brown County Department of Health depending on the limiting layer, fragic characteristics, and seasonal high water table.
- 8. The drains shall be installed with a minimum of (.02ft per 100ft) slope towards drain outlet.
- 9. A minimum of a four inch perforated piping shall be used in the trench bottom.
- 10. #8 to #11 stone, rock or Indiana DOT 23 sand shall be used as the media.
- 11. Media shall be filled to within six inches of the A horizon.
- 12. If the media is held at six inches of the A Horizon fabric must be used between the media and the soil.



#### **Elevated Sand Lined Systems**

The following procedures are to be followed and adherence to state and local codes documented when inspecting subsurface sand lined systems. Inspection results must be documented on an inspection form at the time of inspection.

- 1. The plastic limit of the soil is to be checked to ensure the system is installed under proper soil conditions.
- 2. The septic tank is to be inspected for proper baffles, gas deflector and filter if present. The inlet and outlet connections must be water tight. The septic tank must have a gas tight riser. The septic tank must be installed level. This will be verified with a laser. Measurement from the home or home site to the tank must be taken and documented on the inspection form to ensure proper set back distances have been met and to simplify locating the tank in the future.
- 3. If required the pump chamber must be inspected. The pump chamber must be installed level. This will be verified with a laser. The inlet and outlet connections must be water tight. A gas tight riser must be installed. The pump sizing information must be confirmed during inspection to ensure the information submitted is correct and that the proper size pump has been installed. The pump dose must be recorded on the inspection form. If pumping down slope, a ¼ inch weep hole must be drilled into the bottom elbow on the delivery line inside the pump chamber.
- 4. All trees, shrubs and debris must be removed at least 10 feet from bed area.
- 5. The distribution box (velocity reducer) is to be inspected to ensure water tightness. The inlet pipe is to be one inch higher than the outlet pipe. Using a torpedo level or laser ensure the box is installed level.
- 6. Inspect the pipe leaving the distribution box (velocity reducer). Ensure the pipe has positive fall. If in doubt, confirm fall with a torpedo level or laser.
- 7. Chisel plow or rip bed area parallel to the contour of the site.
- 8. Using a 100 foot tape measure, the length, width and depth of the bed is to be measured and is to match the specification sheet. The bottom of bed is to be fluffed, not slick.
- 9. Twelve inches of sand (Indiana DOT spec 23 sand only) is to be placed and leveled across the ripped bed site.
- 10. Piping installed as per manufacturers guidelines.(on contour  $+/-\frac{1}{2}$  inch)
- 11. Three to six inches of sand is to be placed over the piping.
- 12. Four inch raised connections are to be installed as per manufactures guidelines
- 13. Observation port to be installed as per manufacturers guidelines.
- 14. Low air vent is to be installed as per manufacturers' guidelines.
- 15. High vent if applicable is to be installed as per manufacturers' guidelines. (10'verticle separation between low and high vent)
- 16. Six to nine inches of soil is to place over the system. Total material over piping shall be a minimum of twelve inches, crowned to promote rain run-off. System side slope tapers shall be no greater than 3 horizontal feet for each one foot of vertical drop. (3 to 1 slope).
- 17. Soils are to be placed only with a low ground pressure trac machine or a shooter truck.
- 18. All areas within the SLS installation shall be finish graded, fertilized, seeded and strawed.

# SANDLINED SEPTIC SYSTEM BACKFILL INSPECTION FORM

Date:	Card #:
Property Owner:	Permit #:
Site Address:	
Contractor:	
System Type: Presby GEO-flow	Subsurface Elevated
SEPTIC TANK Circle one: New	Existing
Type: Cement Plastic O	ther:
Manufacturer: Shelby Sexton/Wilber	et Other:
Size: 1000 1250	1500 Other:
Distance from house:	Fall from house to tank: Y N
Fall from tank: Y N	
PUMP TANK Required? Y N	
Pump Brand: Zoeller Other:	Model: Dose:
NEMA 4X? Y N	
DISTRIBUTION BOX Required? Y N	
Type: Cement Plastic Other:	5' from bed? Y N
Baffle end max. 2" from bottom? Y	N Fall from d-box (if gravity flow)? Y N
PERIMETER DRAIN	
Trench depth:	

Gravel <6" from grade?	Y	N	5' solid pipe at exit?	Y	N		
Fall toward exit?	Y	<i>N</i>	Rodent guard?	Y	N		
<u>SPECIFICATIONS</u>							
Bed size required:		Bed	Size: #	of beds:		_	
Bed depth required:			Bed depth:	_ # of lines	s: 1 2	2 3 _	_
Smeared bed?	Y	N	10' between low and I	nigh vent?	Y	N	
Low vent w/ guard?	Y	N	High vent (if required)	) w/ guard?	Y	N	
Base sand depth 6" (su	bsurfac	e) or 12	2" (elevated)?		Y	N	
Sand over pipe 6"?	Y	N Soil	cover 6-12"?	P	Y	N	
Observation port:	Y	N	Connector level with	top of pipe	? <i>Y</i>	N	
FINAL INSPECTION:							
Seeded & Strawed?	Y	N	Permit Signed?	?		Y	N
Comments:							
APPR	ROVED	<del> </del>	_ NOT APPR	OVED			
INSPECTED BY:			D	ATE:			

Geotextile fabric? Y N Piping installed? Y N

# TRENCH SEPTIC SYSTEM BACKFILL INSPECTION FORM

Date:				Card #:			
Property Owner:				Permit #: _			
Site Address:							
Contractor:							
System type: <i>Gr</i>	ravity Are.	a Dosing Pre	essure Dist.	Chambers _			
SEPTIC TANK	New or E	xisting					
Type: Cem	nent Plas	stic Oth	er:				
Manufacturer:	Shelby	Hudson	Other:				
Size:	1000	1250	1500	Other:			
Distance from ho	use:		Filter:			Y	N
Fall from house to	tank:	Y	Fall from ta	ank:		Y	N
PUMP TANK							
Pump Brand: Zo	peller Oth	er:		Model:			
Dose:	NEMA 4X?	Y N					
DISTRIBUTION B	<u>ox</u>						
Type: Cement	Plastic (	Other:		Holes: 6	<b>8</b>		
Is it level?	N	Speed leve	elers w/ water	? Y	N		
Baffle? Y	N	ls baffle er	nd max. 2" fror	n bottom?	Y	<b>N</b>	
5' from trench?	Y N	Is baffle to	p at least 1" fr	om lid? Y	N		
		Fall from d	istribution box	κ? Υ	N		

## If gravity flow:

#### **TRENCHES**

Trench depth:	Trench I	ength: _	Trench width:			
Distance between trench	centers?		Number of trenches:			
5' solid pipes at beginning	j? <i>Y</i>		Trenches smeared?	Y	N	
End caps?	Y	<b>N</b>				
FOR GRAVEL TRENCHES:						
Perf pipe holes at 4, 8 (& 1	12)? <i>Y</i>	<b>N</b>	Proper pipe used?		Y	N
2" gravel over pipes?	Y	<b>N</b>	10" gravel in trenches?		Y	ΝI
Clean gravel?	Y	N	1/2" to 2 1/2" size gravel?		Y	N
SUBSURFACE DRAIN						
Trench depth:						
Piping installed?	Y N		Rodent guard?	Y	N	
Fall toward exit?	Y		Gravel <6" from grade?	Y	N	
5' solid pipe at exit? Y	N	Geo	otextile fabric?	N		
FINAL INSPECTION:						
Additional cover: inc	hes	See	eded & Strawed? Y N			
Permit signed? Y	v					
Comments:						
APPROV	/ED		NOT APPROVED			
INSPECTED BY:			DATE:			

## Change of Use

#### Change of Use: Authorization to Access Property

When the use of a property is being changed from residential, authorization is needed to access the property for the purpose of conducting a public health inspection to ensure the septic meets current codes.

I acknowledge that I,	(print name)
am the tenant / owner of record / property manager for the property located at:	
	_(site address)

An Environmental Health Specialist of the Brown County Department of Health has notified me that the Department is requesting access to my property for the purpose of conducting a public health investigation. The inspection(s) may include, but is not limited to:

- Inspection
- Observation
- Measurement
- Sampling
- Testing

of items which cannot be directly accessed via existing public right-of-way, including:

- Sanitary and storm sewer manholes, access risers and catch basins
- Onsite sewage system components (septic tank, distribution box, inspection port, etc.)
- Interior (sump pit, etc.) The Department representative is to be accompanied by the tenant or property owner during this phase of the inspection
- Exterior plumbing components (residential sewer cleanout, etc.)
- Individual and community tiles
- Open drainage ditches and creeks
- Ground surface

I have been informed that, pursuant to <u>Indiana Code 16-20-1-23</u>, <u>410 IAC 6-8.3-51(d)</u> and <u>Brown County Septic Ordinance</u>, the Health Officer, or designee may enter upon any property, for inspection purposes, after providing proper due notice. I recognize that failure to grant said access will be sufficient grounds to file for a request for an administrative warrant with the appropriate court of law. It is my understanding that Department access is essential in order to determine whether or not there is a public health threat and/or trace/confirm the source(s) of the potential contaminant/condition. I further recognize that as there may be more than one source of the contamination, the Department will need ongoing access to the property until all testing is completed. I understand that access to my property will be limited to normal business hours, 8 am–4

pm, Monday through Friday, unless otherwise arranged in advance and approved by both parties. The Department representative has provided me with sufficient contact information, should I request further details regarding this situation.

Please check any of the following that may apply
--

	request to be notified of the Department's general findings as it relates to the testing
	onducted on my property. (A public records request is required prior to release of specif
	etails regarding all investigations as they relate to properties other than your own).
	request to be notified when all Departmental testing related to this investigation is completed
Signat	e:
Printe	Name: Date:
Signat	e of EHS representative:
Dulata	Date:

#### Notices of Possible Violations

#### Wastewater Disposal Complaints

A complaint investigation begins once the Brown County Health Department receives a complaint of a discharge that may contain sewage or septic effluent AND when a complainant provides necessary information to complete the complaint form.

- 1. Have complainant complete form or gather information over telephone. Complainant may provide his or her name and phone number or remain anonymous.
- 2. The initial investigation includes mailing the property owner a certified letter and the form titled: <u>Authorization to Access Property</u>, as well as attempt to contact the property owner by phone.
- 3. Staff is to research current data base and paper files to find existing septic location. (May need to go to assessor's office for property card, planning and zoning for further verification and search ownership history.)
- 4. After <u>Authorization to Access Property</u> is signed and dated by the property owner and received by the Department, go to location of complaint, do investigation: dye test and or/water sampling and photographs.
- 5. If the property owner refuses to sign and return the <u>Authorization to Access Property</u> form within 14 business days from the date of the certified letter, see number 10 below.
- 6. If a violation(s) is found, send abatement letter notifying property owner. Include expected time frame of when project should start to correct the issue and procedures to follow. Include a deadline date.
- 7. Follow up progress by visiting site if necessary.
- 8. If deadline for corrective action to be started is not met, mail second letter of notification stating corrective action and procedures. A 30-day extension may be granted if receiving cooperation from property owner.
- 9. Always take weather and soil conditions into consideration when setting time frames.
- 10. If not receiving cooperation, turn over to the Brown County Health Department attorney for further actions.
- 11. To condemn a property, the issue must be discussed fully with other employees of the Environmental Health Department, as well as the Health Officer.
- 12. Once repairs are made and inspected, close out file. File documentation in appropriate place and add complaint to tracking book.

#### Complaint: Authorization to Access Property

I acknowledge that I,	_(print name)
am the tenant / owner of record / property manager for the property located at:	
	(site address)

An Environmental Health Specialist of the Brown County Department of Health has notified me that the Department is requesting access to my property for the purpose of conducting a public health investigation. The inspection(s) may include, but is not limited to:

- Inspection
- Observation
- Measurement
- Sampling
- Testing

of items which cannot be directly accessed via existing public right-of-way, including:

- Sanitary and storm sewer manholes, access risers and catch basins
- Onsite sewage system components (septic tank, distribution box, inspection port, etc.)
- Interior (sump pit, etc.) The Department representative is to be accompanied by the tenant or property owner during this phase of the inspection
- Exterior plumbing components (residential sewer cleanout, etc.)
- Individual and community tiles
- Open drainage ditches and creeks
- Ground surface

I have been informed that, pursuant to Indiana Code 16-20-1-23, 410 IAC 6-8.3-51(d) and Brown County Septic Ordinance , the Health Officer, or designee may enter upon any property, for inspection purposes, after providing proper due notice. I recognize that failure to grant said access will be sufficient grounds to file for a request for an administrative warrant with the appropriate court of law. It is my understanding that Department access is essential in order to determine whether or not there is a public health threat and/or trace/confirm the source(s) of the potential contaminant/condition. I further recognize that as there may be more than one source of the contamination, the Department will need ongoing access to the property until all testing is completed. I understand that access to my property will be limited to normal business hours, 8 am–4 pm, Monday through Friday, unless otherwise arranged in advance and approved by both parties. The Department representative has provided me with sufficient contact information, should I request further details regarding this situation.

	I request to be notified of the Department's general findings as it relates to the testing conducted on my property. (A public records request is required prior to release of specific details regarding all investigations as they relate to properties other than your own).
	I request to be notified when all Departmental testing related to this investigation is completed
Signat	ure:
Printe	d Name: Date:
Signat	ure of EHS representative:

Please check any of the following that may apply:

Printed Name:

#### Indiana Code 16-20-1-23 states:

#### "(a) Upon:

- (1) showing official identification; and
- (2) except as provided in subsection (b), receiving consent of the owner or occupant of the premises;
- (a) A local health officer or the officer's designee may enter any premises at any reasonable time and inspect, investigate, evaluate, conduct tests, or take specimens or samples for testing that may be reasonably necessary to determine compliance with public health laws and rules and for the prevention and suppression of disease.
- (b) A local health officer or the officer's designee shall obtain the consent of the owner or the occupant of the premises under subsection (a), except as provided in any of the following circumstances:
  - (1) Subject to subsection (c), the local health officer or the officer's designee obtains an order from a circuit or superior court in the jurisdiction where the premises is located to authorize the inspection, investigation, evaluation, testing, or taking of specimens or samples for testing.
  - (2) An emergency condition that poses an imminent and serious threat to the health of an individual or the public and the local health officer or the officer's designee believes that a delay could result in a greater health risk.
  - (3) Entry by a local health officer or the officer's designee to a public place or an area in plain and open view to determine compliance with public health laws and rules.
  - (4) Entry under the terms and conditions of a license issued by the local health department at any reasonable time if reasonably necessary to determine compliance with public health laws and rules and the terms and conditions of the license.
- (c) A court described in subsection (b) (1) may issue an order to inspect, investigate, evaluate, conduct tests, or take specimens or samples for testing if the court finds that the local health officer or the officer's designee, by oath or affirmation, provided reliable information establishing the violation of a public health law or rule at the premises.
- (d) However, a local health officer, or the officer's designee shall not inspect property in which the local health officer has any interest, whether real, equitable, or otherwise. Any such inspection or any attempt to make such inspection is grounds for removal as provided for in this article.
- (e) This section does not prevent inspection of premises in which a local health officer has an interest if the premises cannot otherwise be inspected. If the premises cannot otherwise be inspected, the county health officer shall inspect the premises personally."

#### Indiana Administrative Code 410 IAC 6-8.3-51 (d) Administrative authority states:

"The department, its agent, or the health officer or his or her agent shall be permitted to enter upon all properties at the proper time for the following purposes necessary to achieve compliance with this rule:

- Inspection
- Observation
- Measurement
- Sampling
- Testing

#### **Brown County Septic Ordinance:**

The County Health Officer or his agent bearing proper credentials and identifications shall be permitted to enter upon all properties at the proper time for purposes of inspection, observation, measurements, sampling, and testing necessary to carry out the provisions of this ordinance.

## Residential Onsite System Inspection Forms (To be used for <u>Change of Use</u> or <u>Possible Violation Complaint</u>)

## Sand Lined Systems

Property Owner	
Property Address	
Inspector Name	
Inspector certification No	
	Background search
Is there documentation of the sy	stem at the health department? Yes No
If yes attach all health departmer	nt paper work to this document.
If no, a system locate must be pe document.	erformed and drawing of the system must be submitted with this
Permit #	Installation Date
Number of bedrooms on permit	
Type of system	
C	heck all system components
Septic tank	Distribution Box
Outlet filter	Surface/Subsurface drainage (Perimeter, curtain drain)
Dosing tank	Effluent pump
If this system has a secondary tre	eatment device please contact the health department.
If this system is an elevated sand health department.	mound, at grade or pressure distribution system, please contact the
Is home currently occupied Yes	S No
If no, date last occupied	

Number of actual bedrooms		
Number of jetted tubs with >125 gallon capacity		
Has home been remodeled or replaced since the system was installed Yes No		
Are there any leaking fixtures in the home Yes No		
Does the home have a water softener Yes No		
Is the water softener Plumbed into the septic tank Yes No		
If no, where is the point of discharge		
Does the home have a garbage disposal Yes No		
Site and system assessment		
Soils wet, moderate or dry		
Recent weather_		
Has there been any recent digging or excavation on or close to system Yes No		
If yes, explain		
Have all separation distances (setbacks) been met		
Dye investigation		
Introduce the appropriate amount of water and dye for soil conditions and system size		
Are there any odors from system or drainage Yes No		
If yes, describe source		
Are there any signs of surfacing effluent within the system Yes No		
Are there any wet or soft spots within the system Yes No		
Has surface water been properly diverted away from system Yes No		
Sewer line assessment		
Is there a cleanout on the sewer line Yes No		
Is cleanout properly installed and capped Yes No		
Does the sewer line appear to be draining properly. Yes. No.		

## Septic tank assessment

Tank capacity
No. Compartments within the tank
Tank material
Manufacturer
Is there a riser and lid to final grade on tank (required on all tanks after (12/21/90)?
Yes No
Is the riser water tight Yes No
Is tank lid safely secured Yes No
Is there a secondary lid inside the riser (Required on tanks after (7/1/96) Yes No
Is the inlet baffle in place and functional Yes No
Is the outlet baffle in place and functional Yes No
Is the outlet gas baffle in place (unless effluent filter is installed) Yes No
Is the effluent at the normal operating level (at the outlet invert) Yes No
If the effluent level is high or low, stop inspection and notify the health department.
Is there any root intrusion inside the tank Yes No
Concrete tank- Is there evidence of corrosion inside the tank Yes No
Poly tank- Is there any deformity of the tank Yes No
With a sludge meter check the following:
Scum layer depth in inches
Clear zone in inches
Sludge depth in inches
Does tank need cleaning
Do the inlet and outlet seals appear to be water tight Yes No

## Dosing tank

Dose tank capacity		
Dose tank material		
Dose tank manufacturer		
Is dose tank riser to final grade Yes No		
Is the riser water tight Yes No		
Is the riser lid safely secured Yes No		
Is the riser lid structurally sound Yes No		
Is there a secondary safety device inside riser (required on dose tanks after7/1/96)?		
Yes No		
Is the effluent in the tank not above float operating range Yes No		
Is there any root intrusion inside the tank Yes No		
Concrete Tanks – Is there evidence of corrosion inside the tank Yes No		
Poly Tanks – Is there any deformation to the tank Yes No		
Is the tank cracked Yes No		
Do the inlet and outlet seal appear to be water tight Yes No		
Effluent pump		
Pump manufacturer		
Pump model number		
Is pump functioning		
Pump amp draw while running		
Pump voltage		
Is there an alarm		
Is the alarm functioning properly Yes No		
Is the electrical wiring done in a safe manner Yes No		

Electrical connection
Is the alarm and pump on separate breakers Yes No
Is pump submerged at all times Yes No
Is there a quick disconnect on pressure line Yes No
Is there a weep hole in the vertical of the pressure line Yes No
Distribution boxes
Is there a distribution box installed in the system Yes No
If yes, how many
Distribution box material
Does the distribution box have a baffle Yes No
Does the baffle have a weep hole Yes No
Are there solids in the distribution box Yes No
If concrete, does the distribution box have any corrosion Yes No
Is the distribution box cracked Yes No
Is the water level normal (at invert of manifold lines) Yes No
NOTES

## Absorption Field (Sand Lined)

Does the absorption field match the health department's documentation Yes No
Actual square footage of bed
Is there a minimum of twelve inches of cover over the pipes (3"of sand and 9" of soil or 6" of sand and 6" of soil) Yes No
Is the cover crowned to promote surface water runoff Yes No
Is there a low vent with a rodent guard Yes No
If pump assisted is there a high vent with a rodent guard Yes No
Is there an observation port Yes No
If yes, is there effluent in the port, measure, and give the depth of effluent in inches
Subsurface Drainage
Is there an upslope swale on the system Yes No
Is there subsurface drainage for the system, describe
What is the depth of the drain
Is the drain backfilled with aggregate Yes No
Is there a rodent guard at the outlet of the drain Yes No
NOTES

## Residential Onsite System Report

### <u>Trench</u>

Property Owner	
Property Address	
Inspector Name	
Inspector certification No	
	Background search
	ystem at the health department? Yes Noent paper work to this document.
If no, a system locate must be podocument.	erformed and drawing of the system must be submitted with this
Permit #	Installation Date
Number of bedrooms on permit	
Type of system	
	Check all system components
Septic tank	Distribution Box
Outlet filter	Surface/Subsurface drainage (Perimeter, curtain drain)
Dosing tank	Effluent pump
If this system has a secondary tr	eatment device please contact the health department.
If this system is an elevated sand health department.	d mound, at grade or pressure distribution system, please contact the
Is home currently occupied Ye	es No
If no, date last occupied	<del></del>
Number of actual bedrooms	
	5 gallon capacity

Has home been remodeled or replaced since the system was installed Yes No
Are there any leaking fixtures in the home Yes No
Does the home have a water softener Yes No
Is water softener plumbed into septic tank Yes No
If no, where is the point of discharge
Does the home have a garbage disposal Yes No
Site and system assessment
·
Soils wet, moderate or dry
Recent weather
Has there been any recent digging or excavation on or close to system Yes No
If yes, explain
Have all separation distances (setbacks) been met
Dye Investigation
Introduce the appropriate amount of water and dye for soil conditions and system size
Are there any odors from system or drainage Yes No
If yes describe source
Are there any signs of surfacing effluent within the system Yes No
Are there any wet or soft spots within the system Yes No
Has surface water been properly diverted away from system Yes No
Sewer line assessment
Is there a clean out on the sewer line Yes No
Is cleanout properly installed and capped Yes No
Does the sewer line appear to be draining properly Yes No

## Septic tank assessment

Tank capacity
No. Compartments within the tank
Tank material
Manufacturer
Is there a riser and lid to final grade on tank (required on all tanks after (12/21/90)?
Yes No
Is the riser water tight Yes No
Is tank lid safely secured Yes No
Is there a secondary lid inside the riser (Required on tanks after (7/1/96) Yes No
Is the inlet baffle in place and functional Yes No
Is the outlet baffle or effluent filter in place and functional Yes No
(Effluent filter required after (1/1/2011)
Is the outlet gas baffle in place (unless effluent filter is installed) Yes No
Is the effluent at the normal operating level (at the outlet invert) Yes No
If the effluent level is high or low, stop inspection and notify the health department.
Is there any root intrusion inside the tank Yes No
Concrete tank- Is there evidence of corrosion inside the tank Yes No
Poly tank- Is there any deformity of the tank Yes No
With a sludge meter check the following:
Scum layer depth in inches
Clear zone in inches
Sludge depth in inches
Does tank need cleaning
Do the inlet and outlet seals annear to be water tight. Yes. NO

## Dosing tank

Dose tank capacity
Dose tank material
Dose tank manufacturer
Is dose tank riser to final grade Yes No
Is the riser water tight Yes No
Is the riser lid safely secured Yes No
Is the riser lid structurally sound Yes No
Is there a secondary safety device inside riser (required on dose tanks after7/1/96)?
Yes No
Is the effluent in the tank not above float operating range Yes No
Is there any root intrusion inside the tank Yes No
Concrete Tanks – Is there evidence of corrosion inside the tank Yes No
Poly Tanks – Is there any deformation to the tank Yes No
Is the tank cracked Yes No
Do the inlet and outlet seal appear to be water tight Yes No
Effluent pump
Pump manufacturer
Pump model number
Is pump functioning
Pump amp draw while running
Pump voltage
Is there an alarm Yes No
Is the alarm functioning properly Yes No
Is the electrical wiring done in a safe manner Yes No
Electrical connection inside of the riser Outside of the riser

Is the alarm and pump on separate breakers Yes No
Is pump submerged at all times Yes No
Is there a quick disconnect on pressure line Yes No
Is there a weep hole in the vertical of the pressure line Yes No
Distribution boxes
Is there a distribution box installed in the system Yes No
If yes, how many
If more than one (1), is the system sequential distribution Yes No
Distribution box material
Does the distribution box have a baffle Yes No
Does the baffle have a weep hole Yes No
Does the distribution box have speed levelers installed Yes No
Are there solids in the distribution box Yes No
If concrete, does the distribution box have any corrosion Yes No
Is the distribution box cracked Yes No
Is the water level normal (at invert of manifold lines) Yes No
NOTES

# Trench absorption field

Does the number of trenches match the	e health dept. documentation Yes No
Does the length of the trenches match	the health dept. documentation Yes No
Is there a minimum of 12" of cover over	r the trenches
Is the cover crowned to promote surfac	e water runoff
What are the trenches constructed of.	Gravel/pipe
	Tire chips/pipe
	Chambers
	Other – describe
Number of trenches	
Width of trenches	
Depth of trenches	
Total square footage of system	
	NOTES

# Subsurface Drainage

Is there an upslope swale on the system Yes No
Is there subsurface drainage for the system, describe
What is the depth of the drain
Is the drain backfilled with aggregate Yes No
Is there a rodent guard at the outlet of the drain YesNo
NOTES

#### Tourist Homes & Bed and Breakfast

The on-site septic system of a tourist home and bed and breakfast must meet or exceed current septic standards.

The residential on-site septic system is based on the maximum occupancy rate of the proposed tourist home.

The calculation for the on-site septic system is:

Maximum occupancy x 250 square foot with a 1000 square foot minimum.

In addition, other standards must be met.

Get information on the on-site septic;

If the department has information on the on-site septic, set up an appointment with an EHS at the department to discuss options.

If no information is available at the department, an installer or service provider will need to be hired to locate and draft a design of the on-site septic system.

After the design is completed, set up an appointment with an EHS to discuss options.

If the current on-site septic can be used the EHS will submit a letter to the planning commission stating that the on-site septic is approved.

If the current on-site septic cannot be used, either a repair or a new on-site septic system will need to be installed.

### Registration for Installers

Any person engaged in or intending to engage in the installation or repair of onsite sewage (septic) systems within Brown County, Indiana must successfully pass a written test of requirements administered by the Brown County Health Department.

Note: In addition to passing the written test, the person must be certified by the septic system manufacturer to install those systems that specifically require certification by the Indiana State Department of Health. A list of approved onsite sewerage (septic) systems is maintained by the Brown County Health Department. A copy of these certifications must be provided to the Brown County Health Department the same day of taking the written test.

If the applicant passes the test, the applicant shall complete an Installation Card to be kept on file at the health department. The Brown County Registered Septic Contractor name and contact information will be placed on the County Register. In addition, such person must pay an annual fee prescribed by the Brown County Health Department.

At the time of annual license renewal, a Brown County Registered Septic Contractor must provide proper documentation confirming coverage(s) of no less than \$1,000,000 general liability and completed operations liability insurance.

The Brown County Health Officer or the designated agent may remove the name of any person or firm from the register of approved persons for the installation, construction, and repair of onsite sewage systems if the person fails to comply with all rules and requirements of this Ordinance.

Note: If the installer issuance is denied, an appeal may be filed under procedures outlined in *Article XI Administrative Appeals*.

#### **Penalties**

The EHS will have documented their findings through video/audio, water sampling, photographs and writing. All these methods may or may not be used depending on the situation.

The case will be reviewed by the Health Officer for approval to type a corrective action with a deadline.

The letter is to include the violation(s) with the code(s) included.

After the deadline date, the EHS will visit the site to determine if the issue has been resolved.

If not, after approval from the Health Officer, the file is turned over to the Department attorney for possible litigation.



### Administrative Appeals

- 1. Any person who is aggrieved by a decision of the Brown County Health Officer or the designated agent based upon this Ordinance shall submit an appeal within fifteen (15) days to the Brown County Board of Health.
- 2. The applicant must submit a Recommendations and Appeal form provided by the Brown County Health Department.
- 3. Upon receipt of the written appeal (which contains an explanation of objections to the decision), the Brown County Board of Health shall schedule a hearing to consider the matter no later than its next scheduled public meeting date or sixty (60) days.
- 4. The Brown County Board of Health's decision will be considered final.
- 5. If the person or persons are not satisfied with the decision of the Brown County Board of Health, the judicial system could be the next option.

# **Brown County Department of Health**

### **Recommendations and Appeal Form**

Date:	
1. What is the primary issue that you we concerns and recommendations. Please	ould like the Board of Health to consider? (This includes be specific.)
2. What exactly would you like the Boar resolved?	d of Health do or not do? How do you feel this issue should be
3. If you see multiple alternatives to solv	ving the problem, what are those solutions?
4. Why is this issue important to you or	to the community?
5. If needed, please explain further your	reasoning regarding this issue.
Negaci	A dalyana.
	Address:Best time to reach you?
or	best time to reach you:

#### Wastewater Disposal Failures

When an onsite septic system fails an inspection, the property owner is mailed a certified letter from the Health Officer or its agent outlining the nature of the failure. The letter will also state remedial action necessary for compliance, and set time frames to correct the failure.

Remedial action can range from repairing a broken or clogged sewer lateral, re-routing plumbing, to replacing existing septic tanks and drainage field systems.

If soil conditions do not allow repair/installation of the system due to soil saturation or weather conditions, see Standard Operating Procedures for Pump and Haul.

Standard expected time of completion: 90-180 days depending on weather and soil conditions.

Note: Always take weather and soil conditions into consideration when setting time frames.

Should a property owner need financial assistance, the following options might be available:

- Township Trustee
- United States Department of Agriculture (Rural Development) phone number (812) 334-4279
- Rural Community Assistance Program (RCAP) phone number (800) 382-9895

#### Pump and Haul

- 1. The applicant must submit, in writing, the reason for needing to be placed on pump and haul. It must be addressed to the Brown County Health Officer or the designated agent.
- 2. The Health Officer or the designated agent shall make a determination if the request is valid.
- 3. If the request is valid, the applicant must sign and complete a Pump and Haul Authorization form provided by the Brown County Health Department and pay a fee of \$100. This form must also be signed by an Environmental Health Specialist.
- 4. According to State Code 410 IAC 6-8.3-52 (3) there is a one year time frame for pump and haul. This one year time frame may be extended by the county health officer or the designated agent upon documentation of satisfactory operation of the holding tank. If the time frame is extended for one year, the applicant must pay a fee of \$100.
- 5. If the applicant is denied being placed on pump and haul, the applicant can appeal the decision to the Brown County Board of Health. (See Standard Operating Procedures for Administrative Appeals)



#### Pump and Haul Authorization

	AUTHORIZATION IS HEREBY GRANTED TO:
	(Name of Property Owner)
	(Address where pump and haul will occur)
	Date of issuance:
This a	uthorization shall expire on and shall be subject to the following
proce	
•	This authorization shall be revoked unless the pump and haul activities are carried out in a
	manner that has been approved by the Brown County Health Department.
2.	
3.	The applicant named on this authorization is liable for any damage caused by a spill or failure of the pump and haul operation.
4.	A septic contractor (provided by the Brown County Health Department) must be contacted to install an alarm.
5.	It is your responsibility to inform the Brown County Health Department the name of the
	company pumping the septic tank and installing the alarm.
6.	The septic tank must be pumped by an Indiana Department of Environmental Management (IDEM) licensed septic pumper and the septic tank must be blocked so that no effluent escapes into the septic field/bed.
7.	The alarm must be wired correctly and the "OPERATE, TEST, AND SILENCE" switch must be on a post on the outside of the dwelling at an easy-access location. The Brown County Health Department may be testing the alarm on occasion to ensure it is working throughout the pump and-haul process.
8.	
9.	Pump-and-Haul receipts must concurrently be turned into the Brown County Health Department within 10 days after receiving the bill.
10	. Water that does not enter the septic tank cannot be used until you are off pump-and-haul. This includes, but is not limited to, watering the lawn, gardening, washing vehicles and washing you dwelling.
Prope	rty Owner (Print)Phone #
riope	rty Owner (Signature) Date:

# **SOP** Reviews

This form is used when any changes to the current SOP's are updated/changed. The updates/changes must be approved by the health officer and EHS Supervisor.

Date	Document Name	Document Changes	Page #	Initials

