

ROY COOPER • Governor

MANDY COHEN, MD, MPH • Secretary

MARK T. BENTON • Assistant Secretary for Public Health

Division of Public Health

April 30, 2021

Mr. Brad Johnson T&J Panel Inc. 269 Marble Rd. Statesville, NC 28625

RE: Use of PPBPS in Beds with reduction in field area

Mr. Johnson:

The On-Site Water Protection Branch (OSWP) received your request for a rule interpretation on April 23, 2021, for the use of Prefabricated, Permeable Block Panel Systems (PPBPS) in beds with a 50% reduction in field area in accordance with 15A NCAC 18A .1956(3)(a)(ii)(B). After thorough review and consultation with the Attorney General's office, it has been determined that the rules governing on-site wastewater systems in North Carolina, 15A NCAC 18A .1900, **do not prohibit** the use of PPBPS in beds with the 50% reduction calculated in 15A NCAC 18A .1956(3)(a)(ii)(B). However, because of the extreme nitrification field reduction, the OSWP cautions the use of PPBPS in this manner.

Per our discussions, PPBPS in beds will primarily be used in the horizontal configuration on three (3) foot center spacing in accordance with 15A NCAC 18A .1955(d). Also, as discussed, I think it would be greatly beneficial for our profession to add a diagram of PPBPS in beds to your <u>Design</u>, <u>Installation and Maintenance of the T</u> & J Panel Wastewater Treatment System manual.

Please let me know if you have any questions or concerns.

Sincerely,

Jon K. Fowlkes, REHS

On-Site Water Protection Branch Head