

May 18, 1994

**MEMORANDUM**

**GMP #50**

To: District Directors  
Environmental Health Managers  
Environmental Health Supervisors  
Environmental Health Specialists

From: Donald J. Alexander, Director  
Division of Onsite Sewage and Water Services

Subject: Permit Review  
**Administration - Permits**

Effective July 1, 1994 managers are authorized to revise their permit review procedure, if they wish to do so. After this date, permits may be issued by trained and authorized senior environmental health specialists without prior supervisory review.

This GMP applies to well permits, onsite sewage system permits, discharge system permits and combination well and sewage system permits.

Nothing in this GMP should be construed to require managers to revise their permit review process. Further, while guidelines are offered, managers are free to review as many or as few permits as may be necessary to assure that high quality permits are issued. The responsibility for the quality and accuracy of an individual permit lies with the senior EHS. The responsibility for the overall quality and accuracy of the permits issued within a district lies with the Environmental Health Manager.

Routine permit review is an essential part of an effective quality control process. A percentage of permits issued by each senior EHS are to be reviewed after issuance to assure that the accuracy, completeness and general quality of permits issued remains high or continually improves. In general, it is recommended that between 5 and 10 percent of permits issued by fully trained senior EHS with two or more years of demonstrated competency be reviewed. No countersignature is necessary on permits reviewed after issuance. It is recommended that all permits drafted by newly trained staff should continue to be reviewed and countersigned by the manager, supervisor or EHS Senior **prior** to issuance. Intermediate levels of review, as deemed appropriate by the manager should be conducted for all other staff.

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This would include increased review in instances where a previously satisfactory individual demonstrates unsatisfactory performance.

Prior to initiating this procedure, each manager should develop a review plan and inform staff of changes in the process. In no case do the regulations provide for any type of mandatory "take back clause" for permits issued with substantial errors. If a permit is issued with substantial errors, corrections can only be made with the cooperation of the permit holder. Each senior EHS must understand the job responsibility they have for issuing competent permits.

pc: Project Managers  
DOSWS Staff

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