



October 26, 2004

**Department of  
Environmental  
Protection**

59-17 Junction Boulevard  
Flushing, New York  
11373-5108

**Christopher O. Ward  
Commissioner**

Ms. Janene Jaeger  
Executive Director  
Subsurface Plumbers Association  
Of New York City, Inc.  
103-17 Metropolitan Avenue  
Forest Hills, New York 11375

Dear Ms. Jaeger:

Commissioner Ward has asked me to respond to your letter of September 29, 2004, which expressed concerns the Subsurface Plumbers Association has regarding the repair of house sewer connections by lining.

As your letter suggests, this type of "repair" will restrict the diameter of the sewer connection, which may already be undersized according to modern standards. In addition, since approximately 70% of New York City is served by combined sewers, roof leaders, floor drains and yard drains are often connected to the sanitary sewer pipe, rather than installing a separate storm drain, which adds more flow to the pipe than was originally intended for sanitary flow. The lining "repair" method may seal over such connections which will present the building owner with serious unanticipated flooding or backup problems.

Liners intended to repair a crushed sewer connection are not feasible since the cross sectional area of the pipe is already compromised. In addition, liners employed to protect against root intrusion will also compromise the cross sectional area of the pipe unless special preparations are employed.

As you suggest, the work of unlicensed contractors will not be inspected by the Department of Environmental Protection personnel, which implies that both the integrity of the repair and the city sewer it ties into, will be at risk.

**Douglas S. Greeley, P.E.  
Deputy Commissioner**

Bureau of Water and  
Sewer Operations

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We have already experienced cases in which a lining "repair" has failed after a homeowner has expended funds for a repair which must be corrected by a pipe repair.

For the reasons cited above, DEP affirms that relining of house connections is not an approved repair method in the City of New York.

Very truly yours,

A handwritten signature in cursive script, appearing to read "D. Greeley".

Douglas S. Greeley, P.E.  
Deputy Commissioner