



**COUNTY OF PLACER
FACILITY SERVICES DEPARTMENT**

Phone 530-886-4900 Fax 530-889-6809
www.placer.ca.gov

JAMES DURFEE, DIRECTOR
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MARK RIDEOUT, DEPUTY DIRECTOR
BILL ZIMMERMAN, DEPUTY DIRECTOR

May 4, 2012

Via email: commentletters@waterboards.ca.gov

#47

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: COMMENT LETTER – OWTS POLICY

Dear Ms. Townsend:

Placer County (County) appreciates the opportunity to comment on the State Water Quality Control Board's (Board) proposed Onsite Wastewater Treatment System (OWTS) Policy. The intent of the proposed Policy is to meet the legal mandate that requires the Board to develop statewide regulations for septic systems and ensure that surface waters and ground waters are not contaminated by septic systems and are safe for beneficial uses.

The County spans urban, rural, agricultural and forest areas ranging from near sea level to over 7,000 feet above mean sea level. The County operates and maintains public wastewater systems including five wastewater treatment facilities, 275 miles of pipe and 42 lift stations in Placer County. Areas served include unincorporated portions of North Auburn, Granite Bay, Loomis, western Placer County (Dry Creek), Livoti, Sunset Industrial area, Sheridan, Applegate and Blue Canyon. However, most of the rural residential areas in Placer County are served by OWTS. With this diverse perspective, we offer the following comments to the Final Draft OWTS Policy:

1

Section 2.6 – Section 2.6 indicates that an owner of an OWTS with a projected flow exceeding 3,500 gallons per day must submit a Report of Waste Discharge (ROWD) to the Regional Board if the local permitting authority does not have an approved Local Agency Management Program (LAMP). Under the proposed policy, local permitting authorities must submit their current program (or amended program) to the Regional Board for approval as a LAMP, even if they have an existing program for monitoring OWTS. With no approved LAMPs at this time in the State, there will be a delay from the time this policy is effective and the time a local permitting

11476 C Avenue Auburn CA 95603
Entrance at 2855 2nd Street

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authority has an approved LAMP in place. The provision in Section 6.3 which extends interim coverage under this policy does not alleviate the requirement to submit a ROWD in Section 2.6. Therefore, all OWTS serving a flow of greater than 3,500 gallons per day will have to submit ROWDs immediately.

Please revise this requirement to indicate that such an OWTS must instead submit a copy of a letter to the local authority requesting coverage under a LAMP, and require the OWTS owner to submit a ROWD only if:

- A. The local authority responds indicating it will not provide a LAMP covering the projected flow for the OWTS, or
- B. The time allotted for local authorities to receive initial LAMP approval (currently sixty [60] months from the effective date of this policy) has passed, whichever is sooner.

2

We appreciate your consideration of this matter and believe this clarification will save some OWTS owners from having to submit Reports of Waste Discharge and permit application fees that are later rescinded after the appropriate LAMP is effective.

Section 7.6.1 (Tier 1 guidelines) – Please revise the typographical error to indicate the missing measurement unit “...within 1,200 of an intake for surface water treatment.”

Section 7.8 (Tier 1 guidelines) – This section indicates that subdivisions with more than one single family dwelling unit per 2.5 acres will not be coverable under Tier 1 (Low Risk New or Replacement OWTS). We understand that OWTS cannot be reliably used on every small parcel, but the policy already includes a number of specific, qualitative and quantitative requirements that would prohibit construction of a poorly sited OWTS (e.g. setback distances, disposal rates, etc.) regardless of parcel size. Therefore, we request that section 7.8 of the draft policy be removed.

There are many well functioning, low risk OWTS on small parcels in Placer County. In some cases the properties are served by a public water system, very large parcels surround the smaller group of parcels, or the site-specific hydrogeology easily supports an OWTS. This is probably true in other rural counties as well, and some of the rural counties may elect to not prepare a LAMP for coverage under Tier 2. It has been our experience that properly sited, constructed, and operated OWTS are far more cost effective than public wastewater systems for rural areas, and operation of a public wastewater system for a remote group of parcels is cost prohibitive.

Placer County appreciates you taking our comments under serious consideration.

Sincerely,



Bill Zimmerman, P.E.
Deputy Director

JD:KS:lm