



Placer County Health and Human Services Department

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Via email: commentletters@waterboards.ca.gov

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

Comment Letter – OWTS Policy

Dear Board Members:

Thank you for giving us the opportunity to comment on the latest draft. We appreciate the revisions that have been done to this draft (dated March 19, 2012) in response to the input provided by numerous Counties and organizations. We do however still have issues with the following:

- Perspective, Hope, and Opportunity*
- 1) The 24" vertical separation requirement as spelled out in the latest draft (section 9.4.8). Placer County ordinance currently allows an 18" vertical separation from bottom of trench or dripline to groundwater or fractured rock provided the OWTS is a pretreatment system utilizing disinfection. The parcel utilizing pretreatment system is required to have mandatory monitoring and maintenance and this requirement is recorded onto the title of the property. We have subdivisions that have been approved with some of those lots created with this 18" vertical separation. We recommend that this Section of the Policy be amended to allow 18" vertical separation with pretreatment utilizing disinfection OR have this provision of 24" vertical separation apply to lots created AFTER the adoption of the policy.
 - 2) Section 9.4.4 requiring slope stability reports by a registered professional for installation of OWTS in slopes greater than 30%. Placer County has numerous systems installed in slopes between 30% -35% with no issues whatsoever. Our ordinance have specific provisions for slopes between 30%-35% such as deeper trenches (31") on slopes between 30%-35% while still maintaining the appropriate vertical separation. We recommend that this Section requiring slope stability reports be amended to allow installation of OWTS up to 35% without the requirement of a slope stability report.
 - 3) Section 10.12 requiring proprietary treatment OWTS be tested by an independent third party laboratory. This language is too vague and leaves too much room for fraud to occur. Language should be added to specify accredited university third party testing with specific protocols similar to National Sanitation Foundation testing protocols prior to allowance of its use.

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→ 4) Section 8.2.5 that states a Class A, Class B, Specialty Class C-42 or Specialty Class C-36 can install new or replacement OWTS. This Section would need to be amended to conform with State Contractor Licensing Board requirements that a Class B can only install if in conjunction with a new building or remodel and the septic system serves this new building or remodel and repairs are not allowed.

Sincerely,

Mohan Ganapathy, R.E.H.S.
Placer County Environmental Health

cc: Ken Stuart, M.S.E.H., R.E.H.S., Interim Division Director