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April 20, 2018

California Regional Water Quality Control Board, Los Angeles Region
Attention Mr. Eric Wu, Ph.D., P.E., Chief of Groundwater Permitting Unit
320 West 4th Street, Suite 200
Los Angeles, CA 90013
Via email: Eric.Wu@waterboards.ca.gov

Dear Mr. Eric Wu,

**SUBJECT: AMMENDMENTS TO THE LOCAL AGENCY MANAGEMENT PROGRAM
FOR ONSITE WASTEWATER TREATMENT SYSTEMS**

Since the submission of the final version of the County of Los Angeles, Department of Public Health's (DPH) Local Agency Management Program (LAMP) on March 21, 2018, DPH has continued to clarify requirements of the Onsite Wastewater Treatment System Policy with Los Angeles Water Quality Control Board (Water Board) representatives. As a result of these conversations, DPH is submitting the following changes to be incorporated in the final LAMP document:

1. Based on the determination that neither the Tier 2 nor the Tier 3 standards require the testing of effluent for systems designed to reduce nitrogen in wastewater, DPH is requesting the removal of the requirement for effluent testing for Non-Conventional Onsite Wastewater Treatment Systems (NOWTS) unless the system is subject to the requirements for a bacteria impaired water body in Tier 3. Effluent testing will be required when the system is required to provide disinfections as a result of a TMDL or 303(d) listing for bacteria to determine the effectiveness of the disinfection system.

DPH and the representatives of the Water Board agreed that the requirement to install a NOWTS that is certified to meet the NSF 245 Standard or complete DPH's own testing program to prove that the system meets the performance criteria, along with the requirement for an annual inspection by a technician certified by the system's manufacturer is sufficient to ensure the protection of the surface and groundwater.

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The Lahontan Water Board has subsequently requested that effluent testing be required on systems requiring supplemental treatment within their service area. DPH does not support this change and requests that the Los Angeles Water Board move forward as discussed and modify the LAMP to remove the requirement for effluent testing for Non-Conventional Onsite Wastewater Treatment Systems (NOWTS) unless the system is subject to the requirements for a bacteria impaired water body in Tier 3. As an alternative, in the Lahontan region, your Board might consider requiring effluent testing on Tier 2 "commercial" systems that are unable to meet standards for setbacks, percolation rates, or density requirements and expressly exclude such testing for single family residences.

2. Based on additional comments provided by the Water Board representatives, DPH is correcting the information regarding the adoption dates of TMDLs, whether an implementation plan exists for a TMDL, and the requirements when a listed water body is a concrete lined flood channel that is not subject to contamination by OWTS.

All of the requested changes are included in the attached updated version of the Los Angeles County LAMP.

If you have any questions or need additional information, please contact me at (626) 430-5216 or at sabbott@ph.lacounty.gov. Thank you in advance for your attention to this matter.

Sincerely,

For Scott Abbott, REHS

Scott Abbott, REHS, MPA
Manager, Environmental Protection Branch
Department of Public Health, Environmental Health Division
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