OPERATING PERMITS FOR EXISTING SEWAGE SYSTEMS

Intent and Benefit
This policy describes when an operating permit might be required for existing systems with high strength waste flows or large flows greater than 1,500 gpd. The placement of the system within the Operational Permit program for continued monitoring of flows and system performance assures public health protection and may also be a way of allowing facility expansion without the capital expense of additional sewage system construction until it proves necessary.

Background Information
The Mendocino County ordinance regulating on site waste water systems allows DEH to issue an operational permit for all non-standard sewage systems. Those systems with high-strength waste flows or flows greater than 1,500 gpd are considered non-standard sewage systems.

Existing systems such as these are not sought out to be included into the Operational Permit program. However if an expansion of a facility is requested, then the Environmental Health Specialist (EHS) may consider placing an existing sewage system within the Operational Permit program with or without expanding the sewage system.

Statement of Problem
Sewage systems with flows greater than 1500 gpd and/or high strength waste have a greater potential for endangering the environment and public health and therefore are deserving of greater oversight by the Division.

Occasionally an applicant proposing a project makes an argument that it is not necessary to add sewage system capacity to an existing sewage system since the actual flows will not amount to the Divisions per-unit estimates. In some cases the applicant is also proposing flows of increased waste strength above that of domestic sewage for which most systems are designed.
NOTE: High strength waste flows differ from residential strength waste flows in that they:
1. originate from non-residential uses; and,
2. have one or more characteristics listed in Table 4-3 of Design Manual, Onsite Wastewater Treatment and Disposal Design, USEPA, October 1980, page 56, that is higher in concentration than listed as typical for residential wastewater.

The project proponent has the responsibility to demonstrate that waste flow strength from non-residential uses is not high strength.

Policy Implementation
In these instances staff will consider offering the applicant the option of participating in the Operating Permit program with the commensurate monitoring inspections instead of adding sewage system capacity to meet the estimated needs of the proposed project.

System modifications will need to be made if the system is not already equipped, such as inspection risers at ends of trenches and water or effluent meters, so that the system can be monitored.

In some instances the expansion of the sewage system and inclusion in the Operational Permit program may be required by the EHS to assure the protection of the environment and the public health.

An area sized for the estimated flow must be identified and reserved for a replacement sewage system should the existing system experience overloading.

An Environmental Health Specialist Senior in the Land Use Program and/or the Land Use Program Manager must concur with the issuance of the Operational Permit.

Effective Date: _______________
Revised Date: _______________
Note:
Director’s Initials: ___________