

Office of Shellfish & Water Protection
Wastewater Management Program

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Issues and Results from the 2004
LOSS Rule Development Effort



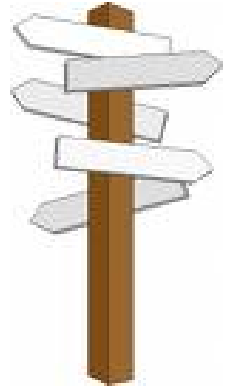
Issues and Results from the 2004 LOSS Rule Development Effort

Presented to:
2008 LOSS Rule Development Committee
January 30, 2008

By Richard Benson, PE

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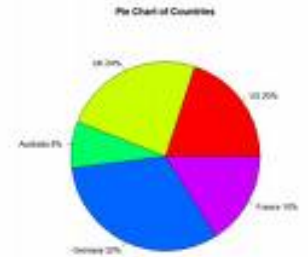
LRDC Process



- LRDC - identified and prioritized 35 topics / issues to be addressed in new LOSS rule
- Topics covered:
 - Ecology / DOH Coordination
 - Practitioner Roles / Qualifications
 - LOSS Management Requirements
 - LOSS Construction Requirements
 - Engineering Requirements / Design Standards
 - Enforcement
 - LOSS "Contract Counties"



LRDC Recommendations (Cont.)



Topics receiving most votes:

- Consolidate state jurisdiction for LOSS under one agency (9)
- Strengthen LOSS inspection requirements (9)
- Allow options for public entity management (8)
- Develop criteria for assessing surface/groundwater impacts (6)
- Allow DOH to approve mechanical treatment (5)
- Address LOSS operator competency (5)
- Strengthen requirement for qualified contractors (5)

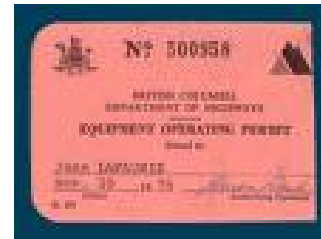
Ecology / DOH Coordination

No. Votes	Topic No.	Proposed Topic
9	5	Jurisdictional splits: Consolidate jurisdiction for LOSS under one agency (Health)
5	7	Mechanical Treatment: Allow DOH approval of mechanical treatment for LOSS under certain conditions
3	6	Flow Splitting: Clarify definition of to prevent practice to avoid Ecology or Health requirements LOSS
2	8	Reuse: Encourage or require proponents to consider reuse options in LOSS project design / submittals
1	30	Consolidate approval authority for state agency-owned LOSS under one agency (Health)



Practitioner Roles / Qualifications

No. Votes	Topic No.	Proposed Topic
5	3	LOSS Operator Competency: require operator training, certification or service contract with a qualified provider
5	22	Qualified Installers: strengthen requirements to assure only qualified installers construct LOSS
0	31	Develop table/matrix showing regulator's & practitioner's roles/responsibilities for design permitting, construction management & licensing/certification of LOSS
0	32	Require licensed practitioners: Allow only state or locally licensed professionals to site, design, construct, manage or permit LOSS
0	34	Exempt state employees from local approval: Allow state employees to install, operate & maintain state owned LOSS subject to ECY or DOH authorized training and/or certification



LOSS Management Requirements

No. Votes	Topic No.	Proposed Topic
8	1	Allow options for public entity: refine/clarify public entity requirements, add detail to rule from "LOSS Management & Maintenance Guidelines"
2	2	Single owner: clarify owner responsibilities and add detail from DOH "sample single owner agreement"
1	4	Operating permits: strengthen requirements for LOSS operating permits and annual reports

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LOSS Construction Requirements

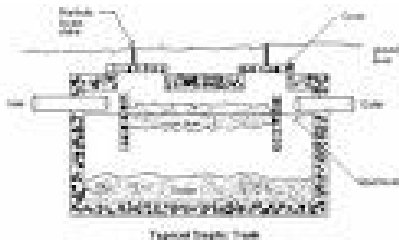
No. Votes	Topic No.	Proposed Topic
9	18	Inspection: Strengthen requirements for engineer inspections
4	33	Engineer responsibilities: Allow design engineer to authorize drainfield cover with DOH concurrence

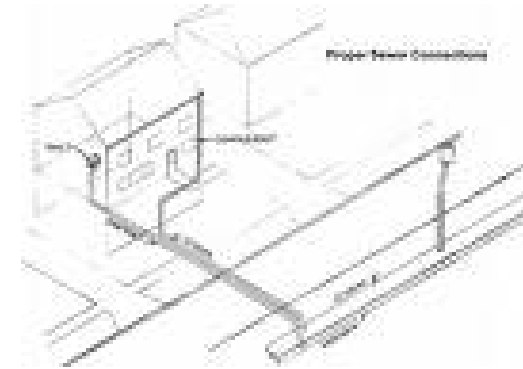
Engineering Requirements/ Design Standards (cont.)

No. Votes	Topic No.	Proposed Topic
2	28	Design for peak flows: tighten rule to assure all LOSS components are sized for peak (not average) flows
1	20	Move important guidance to rule: Add selected standards from DOH guidance documents into rule
1	35	High strength waste: develop minimum design criteria for high strength waste applications such as RV dump / hookups
0	14	Septic tank sizing: revise LOSS tank sizing requirements for consistency with WAC 246-272A

Engineering Requirements / Design Standards (cont.)

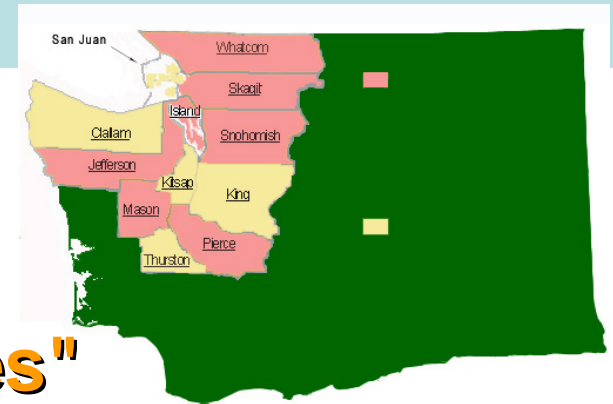
No. Votes	Topic No.	Proposed Topic
0	15	Pump chamber sizing: include new requirements for LOSS pump chamber sizing
0	16	Duplex pumps: require duplex pumps for all LOSS projects
0	17	Timed dosing: require timed dosing for all LOSS projects
0	25	Eliminate guidance: Eliminate option in LOSS Standards for addressing high strength waste through drainfield sizing
0	27	Reduce separation: reduce minimum separation between drainfield sectors to 10 feet consistent with bed separations
0	29	Waiver of 150% requirement: Allow waiver of 150% drainfield construction requirement with new treatment or distribution technologies under certain conditons





Enforcement

No. Votes	Topic No.	Proposed Topic
1	23	Authority to require sewer: Authorize DOH to require failing LOSS to connect to sewer when available (within 200 ft)
0	24	Extreme non-compliance: Strengthen DOH enforcement options for cases of extreme non-compliance



LOSS "Contract Counties"

No. Votes	Topic No.	Proposed Topic
5	10	Program standards: Develop LOSS program standards (approval criteria, inspections, reviewer competency, operating permits, etc.) for LOSS contract counties
1	11	DOH oversight of contract counties: Provide for DOH oversight to assure program standards are met (see topic 10)
0	9	Formal contacts: Develop and sign consistent formal contracts with contract counties
0	12	DOH technical assistance: Provide or offer DOH technical assistance to LOSS contract counties



DOH has records on 700 *
Large Onsite Sewage Systems (LOSS)

* The actual number of systems is likely to be significantly higher. Undocumented LOSS include those constructed prior to the DOH LOSS program; some that were installed with LHJ permits but records are no longer available; and those installed before permits or records were required. They usually come to DOH's attention when a repair is needed.