

LOSS RAC Discussion Agenda & Record of Decisions

Issue Paper for Technical Subcommittee Meeting		<i>Number of Members Present:</i> _____	
Engineering / Design Topics		Topic Number: 3	50% +1= _____ Two Thirds = _____
Topic Statement	Verify what horizontal setbacks should be included in the LOSS rule.		
Problem Statement	Historically, horizontal setback (separation) requirements have been in small OSS and LOSS rules since the first rules. Horizontal distances are viewed as providing protection – the greater the separation, the greater the level of protection. The current small OSS and the LOSS rules contain required horizontal setbacks from various system components – tanks, drainfields, and transmission lines to a variety of features (See table in reference section.) Should setbacks be different for LOSS than they are for small OSS?		
Background	<ul style="list-style-type: none"> • While horizontal separations do provide some horizontal distance through which effluent must move before reaching a specific feature, horizontal movement through soil does not provide a predictable level of pathogen reduction. Predictable pathogen reductions occur primarily during the vertical passage downward through unsaturated soil. Increased horizontal setbacks may, however, have positive impacts on phosphorus removal since the effluent must pass through more soil. • Attempts made to reduce horizontal setbacks because of increases either in vertical separation or required pretreatment have been met with considerable resistance. The prevailing thought seems to be that horizontal setbacks are an integral part of the treatment process, though, as stated, that's not necessarily correct. • Current horizontal setbacks for LOSS are typically the same as for small OSS. However, increased flows in LOSS may increase the concern about whether sufficient setbacks exist, especially from some features. • New setbacks were established in the current small OSS rule (see table in reference section). These may not have been discussed for potential applicability to LOSS. 		

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WAC 246-272A-0210 (Table IV)

Reference Research	Items Requiring Setback	From edge of soil dispersal component and reserve area	From sewage tank and distribution box	From building sewer, and nonperforated distribution pipe
		Well or suction line	100 ft.	50 ft.
	Public drinking water well	100 ft.	100 ft.	100 ft.
	Public drinking water spring measured from the ordinary high-water mark	200 ft.	200 ft.	100 ft.
	Spring or surface water used as drinking water source measured from the ordinary high-water mark ¹	100 ft.	50 ft.	50 ft.
	Pressurized water supply line	10 ft.	10 ft.	10 ft.
	Decommissioned well (decommissioned in accordance with chapter 173-160 WAC)	10 ft.	N/A	N/A
	Surface water measured from the ordinary high-water mark	100 ft.	50 ft.	10 ft.
	Building foundation/in-ground swimming pool	10 ft.	5 ft.	2 ft.
	Property or easement line	5 ft.	5 ft.	N/A
	Interceptor/curtain drains/foundation drains/drainage ditches			
	Down-gradient ² :	30 ft.	5 ft.	N/A
	Up-gradient ² :	10 ft.	N/A	N/A
	Other site features that may allow effluent to surface			
	Down-gradient ² :	30 ft.	5 ft.	N/A
	Up-gradient ² :	10 ft.	N/A	N/A
	Down-gradient cuts or banks with at least 5 ft. of original, undisturbed soil above a restrictive layer due to a structural or textural change	25 ft.	N/A	N/A
	Down-gradient cuts or banks with less than 5 ft. of original, undisturbed soil above a restrictive layer due to a structural or textural change	50 ft.	N/A	N/A
	Other adjacent soil dispersal components/subsurface storm water infiltration systems	10 ft.	N/A	N/A

Questions	<p>1. Should the LOSS rule contain horizontal setback requirements?</p> <p>a. If YES, go to question #2.</p> <p>b. If No, that's it for this topic.</p>
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TRS Recommendation: YES.

<i>Committee Vote</i>		
<i>GRN</i>	<i>YEL</i>	<i>RED</i>

2. Should horizontal setbacks vary depending on LOSS size (for example, setbacks may be different for LOSS under 14,500 gpd)?
 - a. If **YES**, What should be different? Then go to question #3.
 - b. If **NO**, go to question #3.

TRS Recommendation: YES, or set minimums. A project site review can result in modified set-back distances from features.

<i>Committee Vote</i>		
<i>GRN</i>	<i>YEL</i>	<i>RED</i>

3. Should all of the features (items requiring setback) noted in the table in the reference section for small OSS be included in the LOSS rule?
 - a. If **YES**, go to question #3.
 - b. If **NO**, which ones shouldn't be included? After determining which features should not have specified horizontal separation requirements, go to question #3.
4. Should additional setbacks be specified?
 - a. If **YES**, which additional setbacks? Then go to question #4.
 - b. If **NO**, go to question #4.
5. Should the distances mentioned in the table in the small OSS rule (included in reference section) be used?
 - a. If **YES**, add distances for setbacks that were added to the table.
 - b. If **NO**, what should the distances be for those you recommend be changed? Once determining what distances should be in the LOSS rule, add distances for any setbacks that were added to the table.

TRS Recommendations, #3-5: Revisions to Table IV:

Public drinking water well	100 feet or as determined by wellhead protection plan.
Drinking water spring	200 feet.
Line 4	Delete item (Spring or surface water used as drinking...).
Last Line	Unlined are surface water – 100 feet.
	Lined are retention ponds – 10 feet.

