Septage Management Strategic Plan

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Solid Waste & Financial Assistance Program

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Table of Contents

Septage Management Strategic Plan

Executive Summary

The purpose of this strategic plan is to describe the process and findings of a broad based Septage Management Advisory Committee (SMAC). The SMAC was created to evaluate the current environment for the management of septage, identify problems in the existing rules and any other internal or external barriers, and propose solutions that would lead to broader overall acceptance of the regulatory program by stakeholder groups and the public.

The SMAC met a total of eight times from September 2002 to May 2003. As part of the facilitated strategic planning process, the committee developed and agreed upon a broad goal to provide reliable long-term systems for the management of septage that protect public health and the environment and are economically feasible and publicly acceptable.

To achieve this goal, eight specific objectives and a set of evaluation criteria were developed. These formed a framework to discuss and develop a consensus regarding specific strategies that should be employed to meet the goal.

Following is a summary of how and to what degree the seven objectives would be met if the strategic plan is implemented.

Objective 1: Increase industry knowledge of regulatory requirements and land application practices. Training of land applier personnel would directly assist in meeting this objective. In addition, the clarifying of responsibilities, the use of a uniform inspection form, audits, and universal permitting are expected to lead to a higher level of industry knowledge. The public processes involved in rule amendments also will provide a forum for increasing this knowledge.

Objective 2: Increase compliance with regulatory requirements and land practices. The implementation of the strategic plan should result in meeting this objective through increased and improved permitting, funding for enforcement and monitoring, and auditing of delegation agreements.

Objective 3: Provide appropriate monitoring and enforcement. This objective would be met through increased funding and changes in the permitting, auditing and delegation processes, as well as the uniform inspection form.

Objective 4: Resolve inconsistencies between State and Federal standards. This objective has been met as a result of discussions instituted during the strategic planning process.

Objective 5: Clarify the circumstances in which permitting is required and increase the consistency of the process. Requiring all land application sites to be permitted and revision of the general permit would result in meeting this objective.

Objective 6: Increase public acceptance of septage management practices. Some progress towards meeting this objective would result from the public processes of rule amendment as well as requiring permits for all land application sites. However, the development and implementation of a specific strategy should be delayed until after the extent and nature of rule and permitting changes have been determined.

Objective 7: Provide sufficient options and capacity for septage management. Since management sites are provided by local government – Publicly Owned Treatment Works (POTWs) - or private enterprise, Ecology is limited in how it can directly create more options. However, providing a more efficient permitting system, better control of disposal and site management, as well as improved public acceptance should encourage more private and public options.

Objective 8: Provide a stable and adequate funding source to carry out state septage management program. The recommended funding mechanism would provide sufficient funding to support the state and delegated local health jurisdictions septage management responsibilities.

If the strategic plan agreed upon by the SMAC is to be implemented the following areas are those with significant policy and/or resource implications to Ecology.

- Instead of permitting septage land application sites on a case-by-case basis, **all** septage management facilities sites would be permitted. Rule language interpretations have led the department to determine that a department-issued permit is not required for individual pumpers managing septage at their own application site unless the department has a compelling reason to declare the facility a treatment works treating domestic sewage. However, many jurisdictional health departments (JHD) disagree with this interpretation and cite language in the rule suggesting that permits are required for all septage management facilities. The strategic plan recommends that it is in the best interest of the state for all sites to be permitted, either by Ecology or a JHD operating under a delegation agreement.

- A stable and adequate funding source and mechanism for septage management would be established. The recommendation is that funding be provided through the establishment of a charge to the owner of septic tanks when the tanks are pumped. The monies received would be split between the state (40%), delegated JDs (40%) and the pumper (20%) providing the service. While further analysis of the charge per tank or septage unit is needed, current estimates are that it would be between $4.00 and $7.00. Revise the existing rules regarding septage management (Chapter 173-308 WAC).

- The rules must be amended if the strategic plan is to be fully implemented. Amendments would include, but not necessarily be limited to; clarifying language regarding permitting (see above), clarifying responsibilities of local and state authorities, and establishing a funding program and process.

Other significant consensus conclusions reached by the SMAC include: Revising the permit application form and permitting process; revising the delegation process, including training for JHD staff; training for land appliers and developing a uniform inspection form.

As part of the SMAC process, three areas were the subject of subcommittee review and considerable discussion. Subcommittee reports and/or SMAC notes addressing these areas are appended as follows:

Appendix A – Permitting Process
Appendix B – Funding Alternatives
Appendix C – Management Options

Septage Management Strategic Plan

Introduction

The purpose of this strategic plan is to describe the process and findings of a broad based Septage Management Advisory Committee (SMAC). Facilitated by Jim This of the Paragon Group, the SMAC met a total of eight times from September 2002 to May 2003. The planning process involved developing broad goals, objectives to meet the goals, a range of strategies, and the application of appropriate evaluation criteria. General strategies were selected for further analysis and re-evaluated against the criteria as well as to how they would meet the objectives. Objectives and strategies were adjusted as necessary to ensure consistency with the goal statement.

Committee Purpose Statement

The Department of Ecology adopted rules for biosolids management – which includes septage management – in the spring of 1998. Implementation of the rules related to septage in Chapter 173-308 WAC has been problematic. Virtually every group of stakeholders has found some fault with these regulations. The Septage Management Advisory Committee was drawn together from various stakeholder groups, with diversity of perspective and experience being a deliberate component. The purpose of this group was to evaluate the current environment for the management of septage, identify problems in the existing rules and any other internal or external barriers, and propose solutions that would lead to broader overall acceptance of the regulatory program by stakeholder groups and the public. The group also worked on developing outputs related to proposed solutions.

Committee Members

Jim Wright	J.A. Wright Construction	Winthrop
Tami DeGroot	Tee-Pee Septic	Othello
Wendy Mifflin	Yakima Co. Solid Waste	Yakima
Les Eldredge	Evergreen Sanitation	Lake Stevens
Corinne Story	Skagit County Health	Mt. Vernon
Ed Dzedzy	Lincoln County Health	Davenport
Dick Price	Stevens County PUD	Loon Lake
Jim Fleming	City of Centralia	Centralia
Laura Benefield	WA Dept of Health	Olympia
Terry Hull	Puget Sound Action Team	Olympia

Dick Hetherington	USEPA	Seattle
Kyle Dorsey (Project Supervisor)	Ecology	Olympia
Marvin Vialle (Project Lead)	Ecology	Olympia
Daniel Thompson	Ecology CRO	Yakima
Jim This (Facilitator)	Paragon Consulting Group	Olympia

Background

An on-site sewage treatment system typically consists of two parts: a septic tank in which sewage is treated by facultative aerobic and anaerobic bacteria and a drain field system where the treated wastewater is discharged into the ground. Residual solids are held in the tank and periodically removed by a pumper truck.

The capacity of an area to accommodate septic systems and manage septage is a matter of concern. The link between management of the residual solids (septage) and the on-site system is the septage hauler/pumper. After pumping, the septage is often taken to a POTW for discharge, however if the POTW was not designed with the capacity and/or the processes to handle septage, other alternatives must be found. Alternatives to discharge at sewage treatment plants vary from area to area within the state. The methods of management noted below are being used in varying degrees throughout the state.

- POTWs (Sewage treatment plants)
- Land application without further treatment
- Land application after treatment
- Composting
- Temporary storage in surface impoundment
- Landfill disposal
- Illegal disposal

According to the 1980 U.S. Census, in that year 520,354 (31.5 percent) of all housing units in Washington were serviced by on-site septic systems. In 1990, there were 630,646 on-site systems, an increase in the percentage to 33.7 percent. No data on septic service was collected in the 2000 census, however, the number of total housing units in this period increased by 398,967. Assuming that 33 percent of these new units were on septic systems, the total number of housing units serviced by on-site systems would have been approximately 750,000 in the year 2000.

Experts estimate that the average time between pumping is five-plus years. Based on these figures, approximately 150,000 residential units are pumped each year.

Regulatory Overview

Technical standards for the current federal biosolids program were published in 1993 under 40 CFR Part 503. While the evolution of Part 503 was primarily about biosolids produced at sewage treatment plants, septage is included by definition in the federal program. Likewise, state statutes under Chapter 70.95J include septage as a component of biosolids. Approaches to septage management were considered early in the development of the state biosolids program. While some local health departments expressed concern about the practice of land application of septage, there was no significant opposition. There was really little question that the land application of septage should be subject to permitting. There was a general position by local health departments that septage management was closely related to their on-site programs and licensing of pumpers, and they wanted Ecology to minimize intrusions at the local level.

The state biosolids program took approximately five years to develop. During that time the vast majority of focus was on biosolids generated at treatment works, but not specifically on septage. In later stages of program development, a fee program was authorized by the Legislature. A determination to calculate the basic fee unit (the residential equivalent) was made for septage, but the actual resulting revenue was not closely evaluated. Ecology anticipated that local health departments would take most of the septage program and would likely charge their own fees. Health departments had generally indicated early on that they could adopt local fees for that or other purposes.

During the five-year program development process, the complexion of the septage management problem changed. Because the overall state program development was primarily focused on the management of biosolids generated by sewage treatment plants, changes to the septage management problem were overlooked. Rather than view septage as a matter of local jurisdiction, health departments or local governing authorities began to see the future role of Ecology in biosolids management, including septage management. During this time, many local elected officials became strongly opposed to fee increases to support a local septage program as increasing fees or adopting new fees became a much more difficult proposition for local health departments. Concurrently, as the ability or interest to manage septage at the local level waned, more and more treatment works began to restrict acceptance of septage for treatment, forcing pumpers to seek land application alternatives.

The state permit program revolves around facilities meeting the definition of treatment works treating domestic sewage. This term was adopted from the federal rules for permitting. While a centralized septage collection facility using lime stabilization meets the definition of a treatment works treating domestic sewage, individual pumpers applying untreated septage to the land do not. Additionally, there is no consensus that individual pumpers applying lime-stabilized septage to the land meet the definition of a treatment works treating domestic sewage. The federal program established rules for pumpers who land apply septage, but never contemplated permitting for individual pumpers. Although it could in theory require permits for centralized septage treatment facilities, it is doubtful that the reach of the federal permitting effort would ever extend that far. The state program followed suit in

part because of expected greater involvement of local health departments when implementation began. Although permitting of septage land application sites is generally not required under the state program, it can be done. The state, however, has not been inclined to do this and local health departments objected when permitting (if desired) of individual pumpers applying septage to the land appeared to be falling to them by default. Local health jurisdictions contended that permitting was a state function and were increasingly frustrated to learn that the state program did not contemplate issuing permits to individual pumpers applying septage to the land. To an extent certain language in WAC 173-308-310 fueled this debate because of differing interpretations. This increased the discord between Ecology and local health departments, and had the further effect of discouraging the development of state to local delegation agreements for implementation of the general biosolids management program.

Septage Committee Goal Statement

Provide reliable, long-term systems for the management of septage that protect public health and the environment and are economically feasible and publicly accepted.

Evaluation Criteria

The following criteria were used in evaluating objectives and/or strategies.

- **Goal oriented** – Will implementation or compliance protect the environment and public health?
- **Clarity** – Is the message clear and understandable to all concerned parties?
- **Consistency** – Is the message consistent with other parts of septage management and related rules and policies?
- **Predictability** – Can the users rely on the message to be used in future decision making?
- **Practicality** – Is the message one which can be carried out within budget and political constraints?
- **Economic feasibility** – Will compliance not create undue economic hardship?
- **Flexibility** – Is the language of the message such that it will work for all of the parties involved?
- **Acceptability** – Is the message and its implementation likely to be acceptable to the various stakeholders and the general public?
- **Coordination/cooperation –** Does the message fosters a good working relationship between parties?

Objectives

OBJECTIVE 1: Increase industry knowledge of regulatory requirements and land application practices.

Problem-Need Statement – Many or even most land appliers lack adequate knowledge of the practices to submit competent permit applications or to run compliant operations. Disproportionate resources must be directed to applications received, and too much attention must be given to potential enforcement activities in the current program.

Strategies/Actions Considered

- Simplify requirements for providers of service
- Disseminate information to providers of service
- Provide technical assistance to providers of service
- Increase permitting and certification
- Standardize reporting
- Ban land application
- Develop an industry newsletter
- Require treatment plants to take septage

OBJECTIVE 2: Increase compliance with regulatory requirements and land practices.

Problem-Need Statement – Lack of consistent enforcement under the current program tips the scales in favor of non-compliant operations. Non-compliance equals less cost to the pumper/disposer when there is no enforcement.

Strategies/Actions Considered

- Establish fitting, consistent penalties
- Support better, greater enforcement
- Increase options
- Disseminate information to providers of service
- Require permits
- Start a certification program
- Institute looser standards
- Provide technical assistance to providers of service
- Develop a guidance document

- Simplify standards
- Provide financial assistance
- Provide free disposal sites
- Define barriers
- Make septage a marketable product

OBJECTIVE 3: Provide appropriate monitoring and enforcement.

Problem-Need Statement – Monitoring and enforcement varies between Ecology regions and counties. In many areas potential violation of standards and procedures are reported by citizens due to the lack of agency monitoring personnel enforcement. The problem is compounded by the lack of a universal permitting of all disposal sites. Illegal dumping occurs, partially as a result of a lack of appropriate sites convenient to pumpers as well as the unlikelihood of being caught.

Strategies/Actions Considered

- Increase monitoring by DOE personnel
- Increase monitoring by local health jurisdictions
- Increase industry self-policing
- Institute mandatory reporting
  – By home owners
  – By pumpers
- Increase the use of technology
- Increase permitting and certification
- Legal authority for optional County Flow Control Ordinance (similar to the existing authority for solid waste)
- Conduct periodic inspections
- Require a minimum local program
- Review requirements for reporting

OBJECTIVE 4: Resolve inconsistencies between State and Federal standards.

Problem-Need Statement – Federal and State laws and regulations contain differing definitions of terms used in septage management. For example, septage under state rules includes material from restaurant grease traps which is specifically not considered septage under federal definitions. The differing language and interpretations lead to issues regarding delegation of federal authority to the state.

Strategies/Actions Considered

- Identify significant differences between state and federal regulations
- Decide which differences need to be reconciled
- Negotiate a resolution to the differences
- Change appropriate state or federal statutes

OBJECTIVE 5: Clarify the circumstances in which permitting is required and increase the consistency of the process.

Problem-Need Statement – A conflict between many of the JHDs and the Department of Ecology has arisen regarding whether or not a department-issued permit is required for all septage management facilities. Rule language interpretations have led the department to determine that a department-issued permit is not required for individual pumpers managing septage at their own application site unless the department has a compelling reason to declare the facility a treatment works treating domestic sewage. However, many JHDs disagree with this interpretation and cite language in the rule suggesting that permits are required for all septage management facilities. This rift has, apparently, led some JHDs to forego delegation of the state biosolids program.

Strategies/Actions Considered (see Appendix A for detailed discussion)

- Have all permitting occur at one level
- Make sure there are clear lines of split authority
- Institute a clear delegation process
- Provide adequate resources for permitting
- Clarify the permitting process
- Institute universal permitting requirements

OBJECTIVE 6: Increase public acceptance of septage management practices.

Problem-Need Statement – There is public opposition to land application based on real or perceived problems of odor and public health. Opposition is particularly prevalent by individuals residing near proposed and existing sites.

Strategies/Actions Considered

- Increase public education
- Review and revise existing land application site requirements
- Make septage a marketable product
- Institute local comprehensive planning that better addresses septage management issues
- Allow disposal of septage in landfills

OBJECTIVE 7: Provide sufficient options and capacity for septage management.

Problem-Need Statement – Some septage is being disposed of in unacceptable facilities or illegally dumped, thus creating adverse impacts to the environment and/or public health. The problem is created or enhanced by the lack of adequate facilities within a reasonable service radius.

Strategies/Actions Considered

- Increase the number of land application sites
- Increase acceptance at POTWs
- Require that all solid waste facilities receive septage
- Increase the number of septage treatment facilities
- Develop septage management facilities
- Grant longer-term permits for management sites

OBJECTIVE 8: Provide a stable and adequate funding source to carry out the state septage management program.

Problem-Need Statement – The current state permit fee program is inadequate to fund an acceptable permitting and compliance septage management program. Generally, funding is needed for permitting, technical assistance, education, sampling analysis, monitoring (inspections) and enforcement. Ecology estimates that approximately $150,000 to $250,000 would be required for the state's efforts in effective septage management. Local jurisdictions delegated to manage septage are also inadequately funded. It is currently estimated that Ecology receives approximately $12,000 per year from septage related permit fees.

Strategies/Actions Considered (see Appendix B for detail on funding options)

- State Pumper fees – Fees charged to pumpers by the state
- Septic Tank owner (Homeowner) recycling fee
- REV modification - A change in the rate charged for septage management (rule change required).
- State General Fund – An appropriation to Ecology
- Fines
- Charge to homeowner at transfer of title.
- Property tax on owners of septic systems
- Toxics accounts—state and local
- Annual EPA grant—106 money
- Land Application fee

Strategies and Tasks to Achieve the Objectives

Task	Activity	Lead	Cost	Objectives	Remarks
STRATEGY 1: Review and revise Rule 308					
Review WAC 173-308 and recommend areas of change based on strategic plan	DOE staff to review rule and identify areas that need to be changed in light of Committee recommendations	Ecology	Minimal	Objective 4	First draft completed by Daniel Thompson (CRO) The SMAC concurred that the items in B and C below should be subjects of rule amendments.
Establish process to permit all sites	Amend rules	Ecology	High	Objectives 2, 3, 5	Rule amendment can be a lengthy and expensive process; however, even though it might be technically possible to require permits for all land application sites without a rule change, it is highly unlikely that it would be politically realistic.
Clarify Ecology responsibility for land application sans delegation	Review current rules	Ecology	Low	Objective 1: Increase industry knowledge	Can most likely be accomplished without rule amendments; however, whether or not this would be effective in meeting other identified desires (permitting all sites) is questionable.
	Amend rules if necessary or prepare and distribute policy	Ecology	High	Objectives 2, 3 Objective 5: Clarify permitting & increase consistency	

Task	Activity	Lead	Cost	Objectives	Remarks
STRATEGY 2: Revise the permitting process					
Revise general permit for septage to promote efficiencies	Consolidate as much as possible the septage permit requirements into single unit Develop checklist for identification of specific relevant sections of the general permit that apply to land application of septage Provide training/ certification of permit holders of land application sites and land appliers Revise application for general permit to reflect other changes	Ecology	High	Objectives 1, 5	The approach of retaining septage permit requirements in the body of the overall statewide general permit for biosolids while consolidating the septage portion into a single section avoids the need for two separate administrative processes by Ecology and avoids the need for separate permit processes by applicants where dual coverage is desired. The SMAC recommends that the application be revised to reflect the approach above for the general permit. The group felt a consistent approach between the permit and the permit application made sense, and did not want to imply a separate permit by requiring the use of a separate application form. The SMAC agreed that land appliers and permit holders should receive training on land application practices; however, there was no consensus on who should provide the training and the definition and/or criteria for certification. Efforts to revise the general permit will be a significant workload. The permit expires in May 2003 (Applicability continues until replaced or >>>>>>>), however, so much of this workload is basically unavoidable. • Northwest Biosolids Management Association doesn't like biosolids being lumped with septage • Don't want biosolids to subsidize septage • Module for land applied septage

Task	Activity	Lead	Cost	Objectives	Remarks
STRATEGY 3: Revise the Delegation Agreement process					
Create statewide delegation agreement	Prepare draft delegation agreement for septage	Ecology LHJs	Mod	Objectives 2 and 5	Consensus that the language adopted for delegation should not be subject to further revision with each local jurisdiction. This does not mean that the delegation agreements could not contain alternatives or options, only that once the basic language is adopted it should not be subject to further negotiation. The subcommittee recognizes that acceptance of delegation is tied to the idea that all septage land application sites would require permitting. The subcommittee also supports the approach of working with the Environmental Health Directors draft delegation language to develop a consensus. Rewriting the current agreements is not seen as a big workload. Meeting with and trying to develop consensus with local health departments will probably require the largest share of the time involved.
	Obtain JHDs consensus on content	Ecology	Low		
	Revise draft and distribute		Low		
	Revise and adopt		Low		
Train JHD staff in permitting and land application elements of the program	Develop training module for delegated jurisdictions	Ecology JHD	Mod	Objectives 2, 3, & 5	The subcommittee recommends that any jurisdiction signing a delegation agreement should receive a day of direct training at the local jurisdictional office. This would include training on the permit process as well as technical issues. The workload here would involve developing the training program and presenting it for one day at delegated local health departments.
	Conduct training	Ecology	Low		

Task	Activity	Lead	Cost	Objectives	Remarks
STRATEGY 4: Enhance the inspection of septage processes and auditing of land application permit compliance					
DOE audits JHD delegation agreements — requires C above	Review current rules	Ecology	Low	Objective 1: Increase industry knowledge Objectives 2, 3	Can most likely be accomplished without rule amendments; however whether or not this would be effective in meeting other identified desires (permitting all sites) is questionable.
	Amend rules if necessary or prepare and distribute policy	Ecology	High	Objective 5: Clarify permitting and increase consistency	
Implement the use of a uniform inspection form	Develop form	Ecology	Low	Objective 3	
	Obtain agreement from JHDs and pumpers	Ecology	Low		
STRATEGY 5: Develop more options for septage use, treatment and disposal.					
Study and make recommendations	Obtain factual data on capacity and needs	Ecology	Low	Objective 7	Since management is provided by POTWs or private enterprise, Ecology is limited in how it can directly create more options. However, providing a more efficient permitting system, better control of illegal disposal and inappropriate management, and improved public acceptance should over the long run encourage more private and public options.

Task	Activity	Lead	Cost	Objectives	Remarks
STRATEGY 6: Enhance public education on septage best practices					
Place on Hold until Funding and Rule Changes are ensured	Study and make recommendations Develop a public education package		Low	Objective 6	Potential Components include: • What is septage? • What I should flush and not flush • Public education about positive impacts of proper land application
STRATEGY 7: Develop budget and funding options for comprehensive program					
Refine funding strategy that is charged to customers based on gallons pumped.	Develop budget needs for components of new program and consolidate for comprehensive program Determine need for RCW or WAC change Collaborate with JHDs, pumpers and others Develop Rule changes(if needed) thru Rule Advisory Group or Proposed legislation, if necessary	Ecology	High	Objective 1, 3, 4, 8	Concerns include: • How much should be charged? • What is the best way to collect and report? • Conflict with LHJs that currently have similar fees to fund local on-site sewage or operations and maintenance programs. • Conflict with LHJs in which land application of septage does not take place.

APPENDIX A – Permitting Process

Subcommittee Evaluation of Six Proposed Options - December 16, 2002

Evaluation Approach

We discussed each of the six options separately and developed a list of pros and cons associated with each option based on the comments and concerns expressed by representatives from the Department of Ecology (Ecology), the jurisdictional health departments/districts (JHDs), the Department of Health (DOH), and septage land appliers/pumpers. Next we evaluated the options based on the evaluation criteria that were developed by the entire Septage Management Action Committee members. Lastly, we numerically scored each option based on the results from the evaluation.

Recommendation

Based on the above approach, we recommend the adoption of Option #2. Our evaluation of Option #2 resulted in the overall highest score (+7) and zero "no" responses. No other option received a positive score. Our recommendation of Option #2 is contingent upon the implementation of the "enhancements" listed.

OPTION 1: No changes—continue the current system "as is".

JHD Responsibilities	Ecology Responsibilities
• License/permit pumper trucks. • Option to inspect land application sites and septage treatment facilities except where a delegation agreement requires inspections. • Option to respond to questions/complaints except where a delegation agreement requires complaint responses.	• Option to permit land application operations. • Permit septage treatment facilities. • Manage enforcement. • Inspect land application sites and septage treatment facilities. • Respond to questions/complaints. • Technical assistance to both JHDs and land appliers.

Pros

- No change in current workload of existing staff or requirements for new staff.
- Retains local contact with pumpers and ties in with scheduled operations and maintenance programs run by the JHDs.
- JHDs license pumpers (there seems to be a desire by nearly everyone that this continues to be the case).
- JHDs have the option of seeking delegation for all or portions of the state biosolids program.
- Provides for extensive flexibility for Ecology to determine whether a permit is required and the ability to develop permit conditions based on site-specific criteria.

Cons

- Has resulted in inconsistency among JHDs and among Ecology regions.
- The current system has resulted in significant non-compliance — especially in the central and eastern portions of the state.
- There is a very low frequency of land application site inspections.
- No set rules on when and under what specific circumstances a permit is required; this is problematic for Ecology, the JHDs, the land appliers and the public.
- Leaving the system as is would not likely be acceptable to the public, the regulatory agencies and septage pumpers/land appliers.
- Very flexible (also a pro, see above), and this likely leads to some of the inconsistencies.
- Results in poor coordination/cooperation between Ecology and some of the JHDs for various reasons, with the primary reason cited being the lack of a permit requirement.

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☐ Yes	☐ No	☒ Not Sure
▪ Clarity (clear and understandable message?)	☐ Yes	☒ No	☐ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☐ Yes	☒ No	☐ Not Sure
▪ Predictability (reliable in future decision making?)	☐ Yes	☒ No	☐ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☒ Yes	☐ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☒ Yes	☐ No	☐ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☐ Yes	☐ No	☒ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☒ No	☐ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☐ Yes	☒ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): -3

OPTION 2: Enhance current system. Recommended

JHD Responsibilities	Ecology Responsibilities
• License/permit pumper trucks. • Option to inspect land application sites and septage treatment facilities except where a delegation agreement requires inspections. • Option to respond to questions/complaints except where a delegation agreement requires complaint responses.	• Permit ALL facilities septage land application facilities and septage treatment facilities. (**E**) • Institute a Permit Fee Program. This fee program should allow Ecology to channel monies collected to JHDs that accept delegation for the septage portion of the state biosolids program. (**E**) • Clarify that Ecology is responsible for the entire septage program except where a JHD has taken delegation for all or portions of the program. (**E**) • Conduct training of staff at delegated JHDs. (**E**) • Create a statewide, formalized delegation agreement with a clear delineation of all tasks/parts of septage management program for Ecology/JHD to choose from. (**E**) • Inspect land application sites and septage treatment facilities except where a delegation agreement requires this by the JHD. • Respond to questions/complaints except where a delegation agreement requires complaint responses by the JHD. • Technical assistance to both JHDs and land appliers. • Manage enforcement. **"E" = enhancement of responsibility**

Pros

- Would achieve consistency with respect to whether or not a permit is required, and this would thereby result in predictability for land appliers.
- Would clarify roles of Ecology and the JHDs.
- JHDs license pumpers (there seems to be a desire by nearly everyone that this continues to be the case).
- JHDs have the option of seeking delegation for all or portions of the state biosolids program.
- Could potentially lead to an increase in delegation agreements, as the controversy over the issue of whether or not a permit is required for a septage land application site is one of the reasons cited by some JHDs for not seeking delegation. Additionally, JHDs might be more willing to accept delegation if funding from Ecology was associated with that delegation.
- Permitting system could assist in enforcement capabilities even on small operations (e.g. the potential revocation of permit as an enforcement action).
- Permitting system could assist in achieving compliance, as the permitting process can be an educational process.

Cons

- It may be difficult to achieve acceptance of this option by the land appliers who presently are not required to obtain a permit and/or those who do not currently pay a permit fee, because this will be a new process they're required to address and a new fee they're required to pay.
- A change in the state biosolids rule will likely be required and time and associated costs will be required for such changes.
- Training of delegated JHD staff will require time from Ecology staff.

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☒ Yes	☐ No	☐ Not Sure
▪ Clarity (clear and understandable message?)	☒ Yes	☐ No	☐ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☒ Yes	☐ No	☐ Not Sure
▪ Predictability (reliable in future decision making?)	☒ Yes	☐ No	☐ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☒ Yes	☐ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☐ Yes	☐ No	☒ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☒ Yes	☐ No	☐ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☐ No	☒ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☒ Yes	☐ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): +7

OPTION 3: All responsibilities are transferred completely and clearly to Ecology.

JHD Responsibilities	Ecology Responsibilities
Responsible up until the septage is picked up by pumpers	***Responsible for septage management facilities***
• License/permit pumper trucks.	• Permit land application operations where required. • Permit septage treatment facilities. • Maintain current permitting structure or establish and implement a new permitting structure. • Maintain current system of collecting fees or establish and implement a new system. • Manage enforcement. • Inspect land application sites and septage treatment facilities. • Respond to questions/complaints. • Technical assistance to land appliers.

Pros

- Would provide clarity of responsibilities.
- Would likely result in consistency, as Ecology would simply apply its septage management program without input from the various JHDs. (The existing inconsistencies between Ecology regions could be fairly easily remedied.)
- Land appliers would only be required to work with one agency.

Cons

- Would remove the option for JHDs to seek delegation, thereby eliminating the current coordination/cooperation between Ecology and some of the JHDs.
- Would remove a source of funding for those JHDs who are charging a fee for monitoring septage management facilities.

- Without an additional funding mechanism, Ecology's resources cannot reasonably handle the increased workload.
- If Ecology is completely responsible, response time for issues requiring on-site evaluation will increase significantly relative to a situation where the JHDs are involved.
- Would eliminate some of the flexibility in the current system.
- Land appliers would be forced to work entirely with Ecology rather than local JHD staff; this might be a problem for some land appliers.
- JHDs would be unable to adequately respond to questions or complaints regarding operations in their current jurisdictions.
- Response time to complaints would be increased.
- Without some changes in the state biosolids rule and/or interpretations of the state biosolids rule, this option doesn't result in clarifying whether and under what circumstances a permit is required. This would result in a continued lack of predictability for the land appliers.

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☐ Yes	☐ No	☒ Not Sure
▪ Clarity (clear and understandable message?)	☒ Yes	☐ No	☐ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☒ Yes	☐ No	☐ Not Sure
▪ Predictability (reliable in future decision making?)	☒ Yes	☐ No	☐ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☐ Yes	☒ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☒ Yes	☐ No	☐ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☐ Yes	☒ No	☐ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☒ No	☐ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☐ Yes	☒ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): 0

OPTION 4: All responsibilities are transferred completely and clearly to the JHDs.

JHD Responsibilities	Ecology Responsibilities
• License/permit pumper trucks. • Establish and implement septage management rules and a permitting structure. • Establish and implement a permit fee collection system. • Conduct inspections of land application operations and septage treatment facilities. • Manage enforcement. • Respond to questions/complaints.	• Initially, training of JHD staff. • Technical assistance to JHDs.

Pros

- Would result in complete local control (some might view this as a con).
- Land appliers would only be required to work with one agency.
- Would result in a better response time to questions or complaints requiring on-site evaluations.
- Would provide clarity of responsibilities.

Cons

- Would result in most land appliers that currently work in more than county to work with more than one JHD and under more than one septage management rule. In a worst case scenario, a land applier could be forced to work with 34 separate JHDs and under 34 different septage management rules.
- Would require a considerable amount of training for JHD staff, presumably by Ecology staff.
- Would require significant changes in the existing state biosolids rule and the associated time and costs required to make such changes.

- Would require JHDs to develop their own septage ordinances or adopt the existing state biosolids rule. This could be very time consuming.
- Would likely be considered an "unfunded mandate", thereby making it difficult to sell to JHDs or elected officials.
- Given that there are 34 septage JHDs, inconsistency is inevitable and would likely be severe.
- Without additional funding, would result in an even greater workload for most JHDs.

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☐ Yes	☐ No	☒ Not Sure
▪ Clarity (clear and understandable message?)	☒ Yes	☐ No	☐ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☐ Yes	☒ No	☐ Not Sure
▪ Predictability (reliable in future decision making?)	☐ Yes	☒ No	☐ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☐ Yes	☒ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☐ Yes	☒ No	☐ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☐ Yes	☐ No	☒ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☒ No	☐ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☐ Yes	☒ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): -5

OPTION 5: All responsibilities are transferred completely and clearly to DOH.

JHD Responsibilities	DOH Responsibilities	Ecology Responsibilities
• License/permit pumper trucks.	• Establish the rules for permitting land application. • Establish a system to collect fees for permitting and inspection of land application • Conduct inspections of land application sites. • Manage enforcement. • Respond to questions/complaints. • Technical assistance to land appliers.	• Initially, training of DOH staff. Subsequently, none.

Pros

- Land appliers would only be required to work with one agency.
- Would provide clarity of responsibilities.

Cons

- Would require significant rule changes of the Ecology state biosolids rule and DOH rules at a significant cost.
- Rule changes would require a significant time commitment from both Ecology and DOH staff.
- Would remove the option for JHDs to seek delegation.
- Would remove a source of funding for those JHDs who are charging a fee for monitoring septage management facilities.
- Without an additional funding mechanism, DOH's resources cannot reasonably handle the increased workload.
- If DOH is completely responsible, response time for issues requiring on-site evaluation will increase significantly relative to a situation where the JHDs and Ecology are involved.

- DOH only has two regional offices for on-site responses (evaluations, complaints, etc.).
- Land appliers would be forced to work entirely with DOH rather than local JHD staff; this might be a problem for some land appliers.
- JHDs would be unable to adequately respond to questions or complaints regarding operations in their current jurisdictions.
- Training of DOH and JHD staff would be required, presumably by Ecology staff.
- Is equivalent to "reinventing the wheel", as this would require creation of an entirely new function for DOH that is currently performed by Ecology and some of the JHDs.

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☐ Yes	☐ No	☒ Not Sure
▪ Clarity (clear and understandable message?)	☐ Yes	☐ No	☒ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☐ Yes	☐ No	☒ Not Sure
▪ Predictability (reliable in future decision making?)	☐ Yes	☐ No	☒ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☐ Yes	☒ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☐ Yes	☒ No	☐ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☐ Yes	☐ No	☒ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☒ No	☐ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☐ Yes	☒ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): -4

OPTION 6: Contingent Responsibility

JHD Responsibilities	DOH Responsibilities	Ecology Responsibilities
• To be determined — likely responsible for smaller operations.	• To be determined — likely responsible for larger operations.	• Initially, training of DOH and JHD staff. Subsequently, none.

Pros

- The smaller sites would be regulated by the JHDs (could be a con, too).
- Would clarify responsibilities.

Cons

- Would require significant rule changes of the Ecology state biosolids rule and DOH rules at a significant cost.
- Rule changes would require a significant time commitment from Ecology, JHD, and DOH staff.
- Would require significant training of DOH and JHD staff, presumably by Ecology staff.
- The larger sites would be regulated by DOH (could be a pro, too) which might be considered by some JHDs as an undermining of their control and knowledge about activities in their current jurisdictions.
- Would likely result in varying standards for on-site management requirements.
- Would likely result in inconsistencies of determinations of whether or not a permit is required.
- May remove the option for JHDs to seek delegation for regulation of the larger sites.
- Would remove a source of funding for JHDs who are charging a fee for monitoring septage management facilities.
- Without an additional funding mechanism, DOH's resources cannot reasonably handle the increased workload.
- If DOH is completely responsible for the larger sites, response time for issues requiring on-site evaluation at those sites will increase significantly relative to a situation where the JHDs and Ecology are involved.
- DOH only has two regional offices for on-site responses (evaluations, complaints, etc.).

Evaluation

▪ Goal Oriented (protection of the environment and human health?)	☐ Yes	☐ No	☒ Not Sure
▪ Clarity (clear and understandable message?)	☐ Yes	☐ No	☒ Not Sure
▪ Consistency (consistent with other aspects of septage management?)	☐ Yes	☒ No	☐ Not Sure
▪ Predictability (reliable in future decision making?)	☐ Yes	☒ No	☐ Not Sure
▪ Practicality (carried out within budget and political constraints?)	☐ Yes	☒ No	☐ Not Sure
▪ Economic Feasibility (avoids the creation of undue economic hardship?)	☐ Yes	☒ No	☐ Not Sure
▪ Flexibility (workable for all of the parties involved?)	☐ Yes	☐ No	☒ Not Sure
▪ Acceptability (acceptable to the various stakeholders and the public?)	☐ Yes	☒ No	☐ Not Sure
▪ Coordination/cooperation (foster a good working relationship between parties?)	☐ Yes	☒ No	☐ Not Sure

Numerical Scoring ("yes" = +1; "no" = -1; "not sure" = 0): -6

Ramifications of the Recommended Permitting Process - January 14, 2003

- Kyle Dorsey*
- Marv Vialle
- Daniel Thompson
- Corinne Story
- Jim Wright
- Les Eldredge

The subcommittee focused on evaluating the ramifications of the Recommended Permitting Process, as described on page 3 of the minutes from the previous meeting.

Separate general permit concept

The subcommittee recommends that the septage management permit requirements be retained in the body of the overall statewide general permit for biosolids management. We also recommend that the permit requirements be consolidated as much as possible within one "septage" section of the general permit in order to minimize the need for external section referencing. As an additional aid, we recommend that a checklist be developed which identifies the specific sections of the general permit which applicants need to respond to or comply with.

Advantages and disadvantages of a combined permit or separate general permit were discussed. Noted advantages of the combined approach are that it avoids the need for a separate administrative process by Ecology in issuing two permits, and avoids the need for separate permit processes by applicants in the case where coverage is desired for both septage and biosolids. In general, the pumper representatives thought this approach would be best for them and their constituents.

The subcommittee further recommends that the permit application be revised to reflect the approach recommended above for the general permit. A separate application was considered but the group felt a consistent approach between the permit and the permit application made sense, and did not want to imply a separate permit by requiring the use of a separate application form.

Efforts to revise the general permit will be a significant workload. The permit expires in May, however, so the better part of this workload is basically unavoidable, eventually.

Rewriting delegation agreements

There was consensus that the language adopted for delegation should not be subject to further revision with each local jurisdiction. This approach creates too much uncertainty from one situation to the next, and too much work overall. This does not mean that the delegation agreements could not contain alternatives or options, only that once the basic language is adopted it should not be subject to further negotiation.

The subcommittee recognizes that acceptance of delegation is tied to the idea that all septage land application sites would require permitting. The subcommittee also supports the approach of presenting the draft delegation language to Environmental Health Directors and working for the strongest consensus on issues and language.

Rewriting the current agreements is not seen as big workload. Meeting with and trying to develop consensus with local health departments will probably require the largest share of the time involved.

Local health department training

The subcommittee recommends that any jurisdiction signing a delegation agreement should receive a day of direct training at the local jurisdictional office. This would include training on the permit process as well as technical issues.

The workload here would involve developing the training program and presenting it for one day at delegated local health departments.

Uniform inspection form

There was easy consensus on the idea of uniform inspection form for all septage land application sites. This form would be used by delegated health departments, and could be used as well by non-delegated health departments who simply wanted to complete an inspection.

Developing the fee program

On the question of permit fees, the subcommittee was stymied. A revenue need cannot be defined absent better knowledge of the shape of the program. The degree of delegation would also have an impact. The revenue mechanism could vary depending on other recommendations. Finally, the permit fee subcommittee is comprised of different representatives. The group did agree to seek AAG advice on the implications under I-601 of changing the permit fee.

- What if we change the basis for determining the current fee?
- What if we increase the fee?
- What if we create a new fee (and delete the old one)?

Strategy for local land use planning.

The subcommittee believes our ability to significantly influence local land use planning is fairly limited. We identified sending a letter to local planners (from Ecology) as one step in an educational process. We further identified the possibility of meeting with or communicating with statewide organizations which represent local planners. We agreed we should provide training or at least perspective to all local health jurisdictions on the importance of including this matter in local planning efforts (so that they in turn can communicate with the local planners). We identified comments submitted under SEPA as a potential means of guiding local land use.

APPENDIX B – Funding Alternatives

Discussion Paper – December 20, 2002

Some questions raised by the committee are:

What are the purposes for which the funding will be used? Depending upon the alternative management approach developed and implemented, the types and required amounts of additional funding will vary. Generally, funding would be used for permitting, technical assistance, education, sampling and analysis, monitoring (inspections) and enforcement. Ecology estimates that approximately $150,000 to $250,000 would be required for an effective septage management program in the state.

How much money is currently being collected for the purposes expressed in an answer to the previous question, and how is it being used? It is currently estimated that Ecology receives approximately $12,000 per year from septage related permit fees. There are a total of 8 or 9 septage managers paying into this fund. These funds are available for the functions indicated above with the exception of enforcement.

What are the costs associated with collecting and administering the funds? Nominal, due to automated billing system.

Will changes in fees or other charges be viewed as duplicating existing charges? For example, would a state pumper fee be viewed as simply an increase in existing fees?

Funding sources currently in place

Pumper fees – Local jurisdictions charge pumpers anywhere form $60 to $330 per business. (Thurston County is an exception with a variable rate) These funds are not available to the state.

Permit Fees (based on Residential Equivalent Values) – Land applicators and others (not including POTWs) who receive septage from pumpers pay the Department of Ecology a fee based on the number of gallons received. Facilities receiving less than 375,000 gallons do not pay.

Potential New or Expanded Sources

State Pumper fees – Fees charged to pumpers by the state based either on:

- An annual flat fee per pumper business (license/certification)

- A fee based on the number of trucks/capacity
- Surcharge – A surcharge on top of local permit fees
  - Pros -
  - Cons -
    - May be viewed as a new "tax" on top of local pumper fees.
    - Flat fee is inequitable since all pumpers would pay the same regardless of volume.
    - May be viewed as infringing on local prerogatives
    - Could create political heat at the local level
    - In order to generate the amount of money needed the flat fee or surcharge would be in the $500 to $1000 range – calling this a surcharge might not meet the laugh test.

Septic Tank owner (Homeowner) recycling fee - Owner would pay a minimal ($1.00 to $5.00) recycling fee each time their septic tank is pumped. Fees could be split between local and state jurisdictions.

- Pros –
  - Equitable in that those creating the septage share proportionally in its re-use management.
  - A minimal fee per payee would raise amounts needed
- Cons-
  - Potential problem in ensuring compliance
  - Cost of collection higher than for previous alternative

REV modification - A change in the rate charged for septage management (rule change required). This could be any of the following:

- Increase in REV for septage.
- Minimum flat fee plus REV – i.e., all facilities pay a minimum of $XXX and the REV kicks in for volumes over a pre-set minimum.
- Elimination of REV for septage and establishment of a flat fee. (May require change in statute)
  - Pros – Places economic burden on those directly involved in non-POTW septage management

Other Sources for Possible Discussion/consideration

- State General Fund – An appropriation to Ecology
  - Given the current economic and budget situation there is little (no) chance that the legislature will appropriate funds for septage management until the economy improves or the state's tax structure is modified.
- Fines
  - Charge to homeowner at transfer of title.

SMAC Discussion of Funding Options – March 28, 2003

Review of the current and projected DOE resources involved in septage management.

FTE Cost	Total
$ 100,000	$ 390,000
$ 100,000	$ 260,000
$ 100,000	$ 650,000
	$ 370,000
	$ 12,000
$ 100,000	$ 200,000
$ 100,000	$ 100,000
$ 100,000	**$ 300,000**

Several overall considerations were agreed upon. Funding sources should:

- Tie directly to the users of the services
- Be sufficient to cover the cost of the program
- Be sustainable for future years

The committee discussed two funding options:

Option A	Option B
DOE collects all funds. • Some funds are kept for DOE administration • Some funds are reimbursed to LHJ's through delegation agreements	DOE collects funds for its administration
An additional fee may be charged for permit review	LHJ's collect funds for any delegation agreements

After discussion it was decided that Option A was the most appropriate.

A series of funding strategies were offered and discussed:

Strategy	Description
Strategy R	Fee on development permits — impact fees
Strategy S	Fee on septic tank applications
Strategy T	Fee per tank pumped
Strategy U	Fee per system pumped — shared among parties ▪ Delegated arrangements o LHJ—40% o DOE—40% o Pumper—20% ▪ Non-Delegated arrangements o DOE—80% o Pumpers—20%
Strategy V	Property tax on owners of septic systems
Strategy W	Toxics accounts—state and local

Strategy	Description
Strategy X	Charge a per gallon fee for each gallon pumped ▪ Every 3 years ▪ 1,000 gallons per pumping ▪ 250,000 tanks per year ▪ 250,000,000 gallons per year
Strategy Y	Bi-annual legislative appropriation
Strategy Z	Annual EPA grant—106 money

After much discussion the committee recommended that a strategy be developed that charged based on systems or gallons pumped. The group felt it did not have enough information to be more specific without input and research from scientists and accountants. Concerns to be reviewed in developing a final strategy include:

- What is the basis for charging—systems, gallons, other
- What is the definition of a system?—e.g., multi-family
- How much to charge
- Feasibility of a sliding scale based on the number of gallons pumped
- Should fee be charged in counties that have no septage land application?
- What is the best way to collect and report

APPENDIX C – Management Options

Subcommittee notes on providing sufficient options and capacity for septage management

1. Greater acceptance of septage at public treatment facilities. Septage has already been treated, however, because of the concentration of materials, septage can adversely affect (pass through or interference) small and medium sized facilities. For existing facilities to accept septage would require either retro-fitting or new components, including receiving stations, holding tanks for testing and/or specialized septage facilities such as lagoons. While mandates or incentives could be provided the cost could be quite high. It was also pointed out that finding acceptable locations on the West Side is difficult.

2. Provide for or encourage dispensation or facilities for storage or disposal when weather conditions preclude land application (frozen ground or excess rain). Consideration should be given to landfill disposal of dewatered septage in these conditions. It was stated that seasonal storage is not economically feasible. It was suggested that we inquire as to how this material is now handled.

3. Setbacks and other standard adjustments to gain greater public acceptance. No consensus was reached on whether or not to proceed with looking at this option. The primary arguments presented were:

   For: More conservative standards could provide for greater public confidence and acceptance

   Against: Would reduce the land available for septage application.

   Other points made were:

   - Some individuals would be opposed regardless of the standards.
   - Opening septage land application standards could result in pressure to open other biosolids management standards. (It was agreed that if this area is pursued the septage regulations should be pulled out into a separate regulation, thus providing a stronger rationale for not looking at other standards.)

4. Increase options for septage management by local jurisdictions. The primary problem in terms of providing options for septage management is the lack of ability to guarantee sufficient septage for economic feasibility. The group discussed various options to ensure such septage flow. These included:

   - Local Flow Control Ordinances - Require management of septage at a particular location. Would probably require legislation.

- Incentives/disincentives for management at particular location (Location, size requirements, design standards, other)
- Franchises - similar to garbage haulers

5. Permit Timing Based on Standards and Design, etc. Under this proposal, land application and treatment permits would be issued for various time periods. A facility with wider setbacks, berms, etc. would receive multiple year permits. A less well designed, but still within minimum standards would receive a permit for a shorter duration. All of the group felt this was an idea worth pursuing.

6. Increased use on Public Lands. Efforts could be made to increase the use of land application on public lands, particularly, DNR lands. Application in burned areas might be one specific area of potential benefit.

In addition to the above, the Group discussed briefly two possible refinements of the Objective for increased options. They are shown below and are provided to encourage discussion and thought - not necessarily in that order.

- **Potential Objective 1: Provide an approved treatment or management facility within a one hour (could be more and may vary for rural and urban areas) driving time of 95% of all septic tanks within each county.**

- **Potential Objective 2: Provide one approved treatment or management facility within each county with the capacity to handle the amount of septage produced in that county.**