

ISLAND COUNTY PUBLIC HEALTH
OSS Failure Identification and Protocol

Background:

As the Island County Public Health (ICPH) Onsite Sewage System (OSS) Operation and Maintenance (O&M) program has been implemented since July 2007, a serious issue has arisen pertaining to differing definitions of “failure” and how it should be handled. This difference undermines the credibility of the O&M program and the knowledge and expertise of Maintenance Service Providers (MSP) working in Island County.

To begin the process of dealing with these issues: ICPH staff held a standardization workshop with the onsite industry on September 29th, 2009 to develop a common understanding. A presentation was given regarding Island County Code 8.07D definition of failure and different scenarios presented to the professionals in the field.

The purpose of this policy is to standardize the definition of a failure and proper process for ICPH staff, onsite professionals and other agencies within Island County to: protect the public health, ensure IC residents receive the best service from the onsite industry, and improve the reputation of the onsite industry and to guide ICPH staff in enforcement.

Relevant Statute:

In defining failure, it is important to consider its definition per Island County Code 8.07D.050.B. It states:

Failing system. Any existing or proposed side sewer or sewage disposal system is considered failing and in violation of these rules and regulations if the contents and/or discharge to or from the side sewer or sewage disposal system include:

1. *Sewage on the surface of the ground;*
2. *Sewage backing up into a structure caused by slow soil absorption of septic tank effluent;*
3. *Sewage leaking from a septic tank, pump chamber, holding tank, or collection system;*
4. *Cesspools or seepage pits;*
5. *Inadequately treated effluent contaminating ground water or surface water;*
6. *Noncompliance with standards stipulated on the permit;*
7. *Violates any laws or regulations of Washington State governing water pollution or the disposal of sewage or liquid-borne waste;*
8. *Creates a health hazard by the contents or effluent being accessible to people, animals, insects, or other possible carriers of disease; and*

9. *Give rise to a nuisance due to odor or unsightly appearance.*

These criteria govern ICPH's enforcement activities regarding "failing systems".

Policy:

A major area of disagreement is whether a system in a state of "distress" would constitute an evaluation resulting in a failure status. A system in distress could exhibit many symptoms including but not limited to: slow pump, slow absorption of effluent by the dispersal component, broken baffles and other serious maintenance needs. **Systems with such symptoms should be dealt with as a system needing maintenance and not a failed system.** It is assumed that failure is imminent for systems in distress without intervention.

In the event a system in distress is discovered by a MSP, and the cause is not clear (such as a broken pipe or baffle), the MSP should contact a licensed designer to determine if the system will require a permit in order to amend the problem. **Pumping of the system should be delayed until a cause for the distress has been determined, unless a delay in pumping leads to a public health threat.** Second party confirmation is recommended. (i.e. Designer, installer, ICPH staff)

Should a homeowner discover a system in distress, it is recommended that the homeowner contact ICPH staff for information regarding licensed professionals, troubleshooting, advice for dealing with the problem, etc.

A detailed inventory and history should be taken to inform the homeowner of methods to extend the lifespan of the system. Such methods may include, but are not limited to:

1. Conserving water
2. Refraining from using harsh cleaners that may harm the system's ability to deal with the sewage
3. Increased monitoring and/or maintenance. (i.e. Pumping of tanks and components)
4. Use of remediation technologies approved by Washington State Department of Health (ICPH permit required)
5. Check for leaking fixtures adding to hydraulic load or water infiltration
6. Utilize dose timing
7. Installation of monitoring ports/observation ports
8. Or other methods upon approval by ICPH Sanitarian
9. Reduce organic load (i.e. paper, garbage disposal, ect.)

If a system is identified as a failure, the service provider should notify the homeowner. ICPH must also be notified via reporting Form D: Onsite Sewage System Evaluation Form.

If a system is identified as a failure, it must be verified by an ICPH sanitarian and/or an OSS Designer. **Systems should not be pumped until verified by ICPH staff unless the system poses an immediate public health hazard.** This may be done before or at the time of meeting a designer on site for soil evaluation under a repair permit.

It is understood that each situation may require its own approach. This policy provides base information and protocol.

Note: This policy was proposed in an email correspondence from Joe Laxson to ICPH onsite staff. This email was dated November 10, 2009.