Understanding the Management Guidelines
Why Are The Management Guidelines Needed?

- Onsite “treatment” codes are prescriptive
- Focus on public health rather than water quality
- Compliance based on construction, not performance
- Property owner responsible without accountability
Central Sewerage Alone Cannot Meet Treatment Needs

- Smaller economies of scale
- Household incomes typically lower
- Usually assigned lower priority for public financial assistance
- Operating costs typically high
- Annexation often required for regional treatment
- Gentrification of community often a consequence
Gap in Regulatory Programs is a Barrier to Good Solutions

- Unsewered properties faced with either/or option rather than continuum of solutions
- NPDES programs frustrated by perceived inadequacy of onsite technologies and ineffectual enforcement
- Local onsite programs perceive NPDES programs to demand rigid and excessive responses to low risk situations
Goals of the Management Guidelines

- To raise the level of onsite/cluster system performance through improved management programs
- To provide conceptual models that may be used by local units of government to assist them in upgrading their programs
Objectives of the Guidelines

- Facilitate **improved management** of onsite/cluster systems
- **Institutionalize** the management concept at the state and local levels
- Promote **consistent management approaches**
- Establish **benchmarks** for minimum levels of management appropriate for the management goals
- Provide **flexibility to customize and upgrade** the management program
- Include both **surface and ground water discharges**
Needs in Decentralized System Management

- Improved owner awareness
- Appropriate application of technology to receiving environment
- Sustained system performance to requirements
- Effective and affordable options for sensitive sites
- Licensed/certified practitioners
- Integration of decentralized and centralized options in planning
Highlights of the Management Model Options

- **Program Model 1: Homeowner Awareness**
  - Prescriptive system designs
  - Proactive maintenance encouraged through education and reminders

- **Program Model 2: Maintenance Contracts**
  - Enhanced treatment on traditional sites
  - Required maintenance contracts between owner and operator

- **Program Model 3: Operating Permits**
  - Entry to performance-based programs (operating permits)
  - Compliance based on performance rather than technology or design

- **Program Models 4 & 5: RME O&M or Ownership**
  - Responsibilities given to responsible management entity (4-third party O&M; 5-third party ownership)
  - Watershed-wide planning
Elements in a Comprehensive Management Program

- Public Involvement
- Planning
- Performance Requirements
- Training & Certification/ Licensing
- Site Evaluation
- Design
- Construction

### MANAGEMENT MODEL 3: OPERATING PERMITS

**Objective:** To have renewable/renewable operating permits to system deliver the operation-specific and measurable performance criteria for the treatment system and periodic audits of compliance monitoring reports. The performance criteria are based on rules in public health and water resources plans by water treatment plants in the system management. Operating permits allow the use of cleared and viable systems on sites with a greater range of site characteristics.

<table>
<thead>
<tr>
<th>MANAGEMENT ELEMENT</th>
<th>RESPONSIBLE PARTY</th>
<th>ACTIVITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>O&amp;M Operations</td>
<td>Regulatory Agency</td>
<td>Maintain operation-conform to operational testing and inspection requirements, and other applicable reporting requirements, and other applicable water management and monitoring regulations.</td>
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<td>Residuals Handling</td>
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<td>Inspections/Monitoring</td>
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<td>Corrective Actions</td>
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<td>Record-Keeping/Reporting</td>
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<td>Financing</td>
<td>Regulatory Agency</td>
<td>Ensure operation-conform to operational testing and inspection requirements, and other applicable reporting requirements, and other applicable water management and monitoring regulations.</td>
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Selecting an Appropriate Management Model

- Models represent basic approaches, not rigid programs
  - Intended to establish a minimum program level
  - Meant to be customized to meet needs and resources of the jurisdiction
  - e.g. use of operating permits (Model 3) to monitor maintenance contracts (Model 2)

- Two types of models presented
  - Regulatory only (Models 1-3) with private ownership and management
  - Regulatory/RME programs that may overlay Models 1-3 or be supplant private property owner responsibilities
Application of Management Programs

- One program is not meant to be better than another except as they relate to potential risks.
- As risks increase, management controls must be more rigorous to maintain the risks to public health and water quality at an acceptable level.
Application of Management Programs

Risk Factors

- Environmental Sensitivity
- Public Health
- Wastewater Characteristics
- Treatment Complexity

Increasing Risks

Recommended Management Program

1. Inventory & maintenance awareness
2. Maintenance contracts
3. Operating permits
4. RME O&M
5. RME ownership
Management Handbook

Major features

- Public awareness and education tools
- Homeowners’ Guide
- Case studies of management programs
- Database for inventories
- Examples of funding
- Model codes and ordinances
- Septage management examples
How Can the Guidelines be Used?

- To evaluate and improve existing programs
- To determine appropriate management structures that will provide the necessary powers for effective implementation
- To obtain model codes and ordinances
- To learn about a variety of programs already implemented in other areas of the country
- To receive “tools” that can be helpful in providing services and their administration
Approaches to Guidelines Implementation

- Implement according to need
  - Customize program based on need and existing program status
  - Implementation may be phased
    e.g. prioritize “hot spots”
  - Need not implement same level of program throughout jurisdiction
  - Do not raise risk factors until controls in place
Planning Element Options

- **Models 1&2**
  Coordination of program with regional planning office

- **Models 3&4**
  Identify critical areas requiring higher levels of treatment

- **Model 5**
  Area-wide planning to determine most cost-effective approach to providing treatment services
Compliance Inspections & Monitoring

- Model 1
  Owner awareness, ‘pre-cover up’ and periodic inspections

- Model 2
  Owner contract with licensed provider

- Models 3&4
  Specific and measurable performance requirements and compliance reporting

- Model 5
  Area-wide aquifer and watershed monitoring with adjustments as necessary
Implementing a Successful Program

- It’s all or nothing!
- Make a commitment
- Demonstrate commitment
- Involve stakeholders
- Implement a public information campaign
- Investigate statutory authority
- Temper expectations