

Technical Memorandum Name: Regional Septage, April 2008

Commenter: Gail McPherson

Comments Date: June 9, 2008

Responses Date: July 18, 2008

The following comments were submitted in response to the above listed Technical Memorandum (TM). The TM was developed as part of the EIR process for the project, in order to help facilitate and broaden the discussion of project issues important to the community. The responses should be considered preliminary because the EIR process is not complete, and the information necessary to fully respond has not yet been developed. The project team is grateful to those citizens who took the time to review the TM and provide comments at this early stage in the process. The project team will endeavor to fully address the comments and concerns through the on-going project development process.

	Comment	Response
1	<p>RE: Response to Technical Memoranda- Septic Receiving Stations, Biosolids handling, and general comments on Broderson (nitrogen management) and related disposal issues awaiting responses:</p> <p>The Citizens for Clean Water respectfully submits the following comments orally and in writing to the County Wastewater Project consultants, including EIR consultant Michael Brandon Associates.</p> <p>Abbreviated oral comments were provided at the June 9, 2008 Technical Advisory Committee based on time allowances.</p>	
2	<p>TM Septic Receiving Station: This Technical Memorandum is quite comprehensive and well prepared. However, the proposal for regional facilities perhaps belongs to the County to develop outside the Los Osos project.</p>	Comment noted.
3	<p>In their past commentary both the Coastal Commission and the Regional Water Board have expressed a strong desire to incorporate county-wide septic receiving facilities into any project options for Los Osos. However, this is in no way a regulatory, permitting, or community mandate for the Los Osos project. A regional septic disposal facility is ancillary to any project selected, and not a required element to the Los Osos project. The discharge prohibition zone established by the Water Board in 1983 is the only basis and impetus for the current project.</p>	Comment noted. Due to the shortage of septage receiving facilities in our County and the expected increase in demand for such facilities with the adoption of septic tank regulations under AB 885, a septage receiving station was identified as a potential revenue source to community. This tech memo estimates the demand, cost impacts and expected revenue from such a station as a basis for determining its feasibility.
4	<p>The most basic of questions concerning septic receiving for a Los Osos project is: <i>Should any facility for septic receiving be part of the Los Osos Wastewater project?</i> Other communities do not currently dispose of their community septic waste at their own facilities. Many objections for siting</p>	See above. This tech memo develops information that will help determine the feasibility of a regional septage receiving facility.

	are diminished if the plant does not include septic receiving.	
5	If septic disposal is determined to be included for local volumes only, a simple decision tree chart would be helpful to describe at what point it is cost effective. An example might be if STEP conveyance is selected, there may be a benefit of providing a facility for the district systems, and allow local septic loads outside the prohibition zone.	This tech memo develops information that will help determine the feasibility of receiving septage from local sources in addition to regional sources.
6	Residential tanks outside the prohibition zone are not distinguished from the STEP tanks, although the size and the operation differs. The correct volumes of each should be included in an abbreviated TM that corrects the tank sizes, and pumping frequencies based on AB 885 which does not require pumping at five year intervals, but has inspection protocol. The contents of the tank that are pumped is a portion of the total volume, perhaps just 25% of the assumed volumes for tanks. Segregating the septic receiving issues upfront from the project requirements will help to avoid misleading the public concerning the required elements for the community project, as well as any misconceptions about assumed benefits. By limiting the Los Osos septic facilities and correcting assumptions for household septic tanks outside the prohibition zone, versus STEP interceptor tanks, good decisions can be made.	<p>Section 3.2 of the tech memo explains the methodology for assuming an average septic tank size of 1500 gallons in the Prohibition Zone, compared to an average size of 1200 gallons in other areas.</p> <p>While AB 885 regulations may not directly require pumping every five years it is expected that inspection of tanks will be required every five years. Requirements to inspect the integrity of the tank on a regular cycle may require emptying the tank more often than currently occurs. This tech memo has provided analysis based on the pumping of septic tanks on an average frequency of both five and ten years.</p> <p>The assumption that septic tank pumping will remove that entire volume of septage is conservative, since pumper truck operators may not take the time to run the STEP pump and remove the liquid effluent before pumping the solids into the truck. This is not expected to affect the estimated impacts at the treatment plant because the solids loading would remain relatively constant, while the volume of effluent is insignificant compared to the total flows.</p>
7	The information developed here should perhaps be a cost to the county, and credit given to the Los Osos project. If a decision is made to include septic receiving at all, the addition cannot be the tail wagging the dog. In other words, only after the selection of the best value project technology should the possible "value added" optional elements be considered. The collection, treatment type and disposal issues cannot be driven by optional elements of the project if sustainability (based on full costs and environmental impacts) is central to the outcomes.	Comment noted. The County recognizes that the primary objective is to develop a community wastewater project that will result in the cessation of septic tank discharges in the Prohibition Zone. However, an objective process to select options for technology and other Project elements must include consideration of many viable options.