OWTS-STS
Annual Operating Permit Program Options

Department of Environmental Health and Quality

Food, Water, and Housing Division

AGENDA

- Background
- LAMP Requirements
- Program Options (1-4)
- Feedback Form

BACKGROUND

- FY 2025/2026 Cost Recovery Feedback
- Review of LAMP requirements
- Benchmarking

DEHQ LAMP REQUIREMENTS

- Annual Operating Permit (AOP) Requirements
  - Sections 3.8.5.7; 6.1; and 9.3.1 why and when an AOP is required.
  - Section 9.3.9 consequence for not having an AOP.
- Submission of Biannual Inspections to DEHQ
  - Section 9.3.4 minimum biannual inspections by QSP. Property Owner responsible for inspection results provided to DEHQ within 30 days.
  - Section 9.3.9 consequence for not submitting inspection results.
- Submission of all service/ inspection results to DEHQ
  - Section 9.3.6.6 QSP reports system status to owner and DEHQ
  - Section 9.3.7 Owner provides to DEHQ all QSP inspection results within 30 days
- Telemetric alarm notification to DEHQ
  - Section 9.2.9 STS requires telemetric alarm

DEHQ LAMP REQUIREMENTS- QUICK ANALYSIS

- Annual Operating Permit (AOP)
  - No LAMP flexibility to reduce/remove requirement of a AOP without RWQCB approved changes to LAMP, however RWQCB signaled support for any changes in program so long as enforcement structure is in place.

- Copies of Biannual Inspections, service inspection results, and telemetric alarm notification to DEHQ
  - LAMP does not state what DEHQ's requirement is but focuses on the property owner's requirements to submit documentation of any service completed on the system within 30 days.
  - DEHQ needs to build in the processes and procedures to receive the documentations and track compliance annually for each record.
  - Options to update AOP program will focus here.

OPTION 1 - MAINTAIN CURRENT PROGRAM

- Processing of AOP Record (new and renewal)
- Ongoing Document Collection/Tracking
  - DEHQ uploads all service and maintenance reports to county database when received
- Telemetric Alarm Set Up Verification and ongoing monitoring of alarm notifications

Total Hours = 3.12 hrs/record

OPTION 2 – REMOVE ACTIVE MONITORING

- Processing of AOP Record (new and renewal)

- Ongoing Document Collection
  - QSP uploads all service reports to county database
  - QSP uploads all maintenance reports to county database

- Telemetric Alarm Set Up Verification

Total Estimated Time = 1.5 hrs/record

OPTION 3 - ANNUAL REVIEW

- Processing of AOP Record (new and renewal)
- Document verification at time of renewal
- Ongoing Document Collection/Tracking
  - QSP uploads all service reports to county database
  - QSP uploads all maintenance reports to county database
  - DEHQ tracks that all documents have been uploaded
- Telemetric Alarm Set Up Verification

Total Estimated Time = 2.2 hrs/record

OPTION 4 - BI-ANNUAL REVIEW

- Processing of AOP Record (new and renewal)

- Document verification at time of renewal

- Mid-year document verification at 6 months

- Ongoing Document Collection/Tracking
  - DEHQ uploads all service reports to county database
  - DEHQ uploads all maintenance reports to county database

- Telemetric Alarm Set Up Verification

Total Estimated Time = 4.1 hrs/record

Land Use - Secondary Treatment System Annual Operation Permit (LAOP)
Program Options

OPTION 1	OPTION 2	OPTION 3	OPTION 4
Current Program	Remove Active Monitoring	Annual Review	Bi-Annual Review
• Permit Processing (new and renewal)	• Permit Processing (new and renewal)	• Permit Processing (new and renewal)	• Permit Processing (new and renewal)
• **No Service and Maintenance Report document verification**	• **No Service and Maintenance Report document verification**	• Service and Maintenance Report Document verification at time of renewal (1x per year)	• Service and Maintenance Report Document verification at time of renewal and mid year (2x per year)
• DEHQ collects and uploads all Service Reports and Maintenance Reports to record when submitted	• Qualified Service Provider uploads all service and maintenance reports to county database **No DEHQ uploading of documents**	• Qualified Service Provider uploads all service and maintenance reports to county database **No DEHQ uploading of documents**	• DEHQ uploads all Service and Maintenance Reports to county database
• Telemetric Alarm Notifications initial verification and ongoing monitoring of alarm notifications	• Telemetric Alarm Set Up Verification **No ongoing tracking of alarm notifications**	• Telemetric Alarm Set Up Verification **No ongoing tracking of alarm notifications**	• Telemetric Alarm Set Up Verification **No ongoing tracking of alarm notifications**
Fee does not include sewage release investigation and enforcement (billed separately at hourly rate)	*Fee does not include sewage release investigation and enforcement (billed separately at hourly rate)*	*Fee does not include sewage release investigation and enforcement (billed separately at hourly rate)*	*Fee does not include sewage release investigation and enforcement (billed separately at hourly rate)*
FY 23/24 Time = 3.12 hrs/record Current Permit Fee = $624	Estimated Time = 1.50 hrs/record Estimated Permit Fee = $300	Estimated Time = 2.20 hrs/record Estimated Permit Fee = $440	Estimated Time = 4.10 hrs/record Estimated Permit Fee = $820

FEEDBACK

- Please scan the QR code to provide feedback on the four program options.

LAOP - STS Program Options