

# LOS ANGELES COUNTY LOCAL AGENCY MANAGEMENT PLAN

## SUMMARY OF MAJOR CHANGES BETWEEN MAY 2016 AND MAY 2018

The Department of Public Health (DPH) submitted a draft copy of the LA County Local Agency Management Plan (LAMP) to the LA Water Board in May 2016. Since that time DPH received comments from the Water Boards and the public and revised the LAMP to incorporate many of the suggested changes. In May 2018, DPH submitted a revised LAMP to the Water Board which is posted on this website at <http://publichealth.lacounty.gov/eh/about/local-agency-management-program.htm> . This table identifies the major changes between the May 2016 and the May 2018 drafts. Note, on May 10, 2018, the Water Board will hold a public hearing on the draft LAMP. For more information on the public meeting visit the Los Angeles Regional Water Quality Control Board website at [https://www.waterboards.ca.gov/losangeles/board\\_info/index.html](https://www.waterboards.ca.gov/losangeles/board_info/index.html). Also, DPH has prepared FAQs regarding the LAMP and that is posted <http://publichealth.lacounty.gov/eh/about/land-use-program.htm>.

### Major Changes

2016 DRAFT LANGUAGE	2018 REVISED LANGUAGE
<p><b>Phase out of Cesspool Usage Pg. 104</b> Because the OWTS Policy does not allow cesspools to be managed by a local agency, cesspool usage is not authorized under this Tier 2 LAMP. Cesspools are being designated as public nuisance in the County code of ordinances, and are required to be replaced by approved systems. A number of cesspools may exist and continue to be discovered occasionally in the County. DPH will gradually phase out cesspools as they are discovered during communications with property owners, in response to complaints, applications for updates and/or repairs, pumper truck reports, or during inspections.</p>	<p><b>Phase out of Cesspool Usage – Less Restrictive Pg. 108</b> Because the OWTS Policy does not allow cesspools to be managed by a local agency, cesspool usage will be regulated by the Regional Water Quality Control Board. The Regional Water Quality Control Board will allow the continued use of cesspools at Single Family Dwellings (SFD) until one of the following events happen:</p> <ul style="list-style-type: none"><li>• The cesspool fails and must be replaced,</li><li>• There is evidence that the cesspool is contaminating groundwater or surface water, or</li><li>• The homeowner obtains a permit to remodel their home in a manner that could increase the wastewater flow, such as adding a bedroom.</li></ul>

<p>Supplemental treatment options will help to phase-out of the remaining cesspools in the county. The DPH will mandate septic tank pumping contractors to report cesspools or non-conforming/failing systems to the DPH. The number of cesspools encountered and replaced will be incorporated in the County annual report to the Regional Water Board.</p>	<p>The DPH will mandate septic tank pumping contractors to report failing cesspools to DPH.</p>
<p><b>Seepage Pits – Pg. 80</b>          Required the installation of a NOWTS when installing a seepage pit as part of the construction of a new septic system. Replacement seepage pits for an existing system do not require a NOWTS if they meet all other requirements.</p>	<p><b>Seepage Pits – Less Restrictive Pg. 83</b>          Requires the installation of a NOWTS when installing a seepage pit as part of construction of a new house with 5 bedrooms or more. Replacement seepage pits for an existing system do not require a NOWTS if they meet all other requirements.</p>
<p><b>NOWTS Requirement Pg. 69</b>          Requires the installation of a NOWTS when the percolation rate is faster than 5 minutes per inch (MPI).</p>	<p><b>NOWTS Requirement – Less Restrictive Pg. 72</b>          Requires the installation of a NOWTS when the percolation rate is slower than 1 MPI but faster than 5 MPI <b>and</b> groundwater is within 20 feet of the bottom of the dispersal system. A conventional system is allowed for percolation rates of 1 – 5 MPI where groundwater is deeper than 20 feet below the bottom of the dispersal system.</p>
<p><b>NOWTS Design and Construction Requirements Pg. 87</b>          The laboratory analysis of the effluent from supplemental treatment components shall be conducted on an annual basis or more frequently as deemed by the DPH. Effluent samples shall be taken by service provider under contract at the point of discharge; the sample shall then be taken to a laboratory certified for such analysis. The results of the laboratory analysis shall be forwarded to DPH. The lab report shall clearly specify the location/address where sample was taken from. The laboratory analysis must include BOD, TN (which consists of ammonia, organic nitrogen, nitrate, etc.), TSS, and pH. Bacteriological analysis is also required when the system is equipped</p>	<p><b>NOWTS Design and Construction Requirements – Less Restrictive Pg. 91</b></p> <ul style="list-style-type: none"> <li>• NOWTS installed to meet the supplemental treatment requirements for pathogens in Tier 3 impaired water body or TMDL areas shall be subject to annual effluent testing. Effluent samples shall be taken by service provider under contract at the point of discharge; the sample shall then be taken to a ELAP certified laboratory for such analysis. The results of the laboratory analysis shall be forwarded to DPH. The lab report shall clearly specify the location/address where sample was taken from. The laboratory analysis must include TSS. The bacteriological analysis shall consist of the total coliform bacteria. The lab results must confirm that the supplemental treatment water quality and bacteriological standards described above are met.</li> </ul>

<p>with a disinfection device. The laboratory findings must meet the RWQCB standards.</p>	<ul style="list-style-type: none"> <li>Annual effluent testing will be required for NOWTS installed in the portion of the Antelope Valley regulated by the Lahontan Regional Water Quality Control Board at a commercial, industrial or institutional setting only.</li> </ul>
<p><b>NOWTS Requirement Pg. 103</b> A NOWTS including disinfection is required by DPH where a conventional OWTS exists on a property and surface or subsurface water conditions are such that the current setback requirements cannot be met.</p>	<p><b>NOWTS Requirement – Less Restrictive Pg. 87</b> In areas of the Antelope Valley regulated by the Lahontan Water Board, the need for a disinfection system shall be evaluated on a case by case basis and chlorine disinfection shall be used as a last resort due to the creation of disinfection byproducts.</p>
<p><b>Impaired Water Body Requirement Pg. 86</b> Systems must be NSF 245 certified, or equivalency determined through demonstration testing unless they are installed for bacteriological reduction as a result of Tier 3 requirements.</p>	<p><b>Impaired Water Body Requirement – Clarification Pg. 87</b> OWTS in areas subject to a TMDL are required to be NSF 245 certified in order to comply with the OWTS Policy.</p>
<p><b>Subdivision Requirement Pg. 65</b> Required subdivisions of existing lots to meet the requirements of Table 2-4 when OWTS would be used.</p>	<p><b>Subdivision Requirement – Less Restrictive Pg. 66</b> The County will accept the use of NOWTS as a variance when the allowable density (as in Table 2-4) cannot be met.</p>
<p><b>N/A - None</b></p>	<p><b>Ability to Obtain Approval With Increased Monitoring Pg. 8</b> Applicants who have been denied an approval by the DPH under the LAMP regulations may apply to the Regional Water Board for the issuance of a Wastewater Discharge Requirement (WDR). A WDR is still subject to the jurisdictional Building and Safety requirements for the installation of OWTS/NOWTS.</p>
<p><b>Alternate Dispersal Systems Pg. 88</b> Allowed the use of pressurized drip dispersal systems.</p>	<p><b>Alternate Dispersal Systems – Less Restrictive Pg. 92</b> Allows the option of using a mound system, horizontal seepage pit, and other dispersal systems.</p>

<p><b>Density Requirements – pg N/A</b> No density requirements for existing parcels</p>	<p><b>Density Requirements – Clarification Pg. 66</b> The area of the Antelope Valley covered by the Lahontan Water Board currently has a density limit of 500 gallons per day per acre or 0.5 acre for a single family dwelling. This limit will continue for existing parcels in the identified area.</p>
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**Specific Language Changes to the LAMP**

<p><b>Definition of NOWTS, p. 7</b> NOWTS means a non-conventional OWTS. NOWTS corresponds to the Tier 3 OWTS described in the OWTS Policy and any OWTS with a requirement for supplemental treatment.</p>	<p><b>Definition of NOWTS - Expanded</b> NOWTS means a non-conventional OWTS. It provides additional treatment of the effluent to reduce Nitrogen (N), Total Suspended Solids (TSS), and the Biological Oxygen Demand (BOD). It may also provide disinfection against pathogens, and alternate methods of effluent dispersal. NOWTS corresponds to the Tier 3 OWTS described in the OWTS Policy and any OWTS with a requirement for supplemental treatment.</p>
<p><b>OWTS usage estimates, p. 51</b></p>	<p><b>Added the sentence</b> The estimate includes all OWTS within the County’s jurisdiction.</p>
<p><b>Soil conditions and lot size, p. 55</b></p>	<p><b>Added the following language to Soil Conditions and lot size on page 55.</b> The Professional Guide requires the submittal of a feasibility report with a general soil description and any features that may affect subsurface wastewater dispersal.</p>
<p><b>Geologic Conditions, p. 55</b></p>	<p><b>Added the following language to Geologic requirements on page 55.</b> The report shall address whether any unstable land mass or areas subject to earth slides require a setback of 100 feet or indicate other setbacks that should be allowed, in accordance with the Professional Guide requirements.</p>
<p><b>Hydrogeologic conditions, p. 56</b></p>	<p><b>Added the following phrase at the end of the first sentence.</b> “...in accordance with the Professional Guide requirements.”</p>

<p><b>Minimum water body setbacks p. 58</b>  NOWTS may also provide alternatives to a property owner when:</p> <ul style="list-style-type: none"> <li>- A property owner wishes to install pressurized drip system to utilize subsurface water for landscape irrigation.</li> </ul>	<p><b>Deleted the phrase</b>  “...to utilize subsurface water for landscape irrigation.”</p>
<p><b>Subdivision Densities, High Density of OWTS, Parcel Size, and Cumulative Impacts p. 63</b>  The County is adopting these subdivision density specifications from Tier 1 of the OWTS Policy.</p>	<p><b>Added the sentence to the end of the first paragraph p. 66</b>  The County will accept the use of NOWTS as a variance when the allowable density cannot be met.  <b>Added clarifying language for existing parcels in the Lahontan region of the Antelope Valley p. 66</b>  Existing lots in the Antelope Valley area under the authority of the Lahontan Water Board are subject to the limitation of 1 single family residence per half acre, or a maximum parcel loading rate of 500 gal/(acre/day) that was in effect prior to the adoption of the LAMP.</p>
<p><b>Table 2-3 Water Bodies Impaired for Pathogens and Nitrogen p. 62</b></p>	<p><b>Updated Table 2-3 to include adoptions of TMDLs that occurred since 2016 p. 65</b></p>
<p><b>Cesspools, p. 64</b>  Typical non-conforming OWTS are small systems constructed prior to modern codes. Some systems consist of cesspools, which are no longer allowed to be managed by a local agency</p>	<p><b>Changed language as follows p. 67</b>  Typical non-conforming OWTS are small systems constructed prior to modern codes. Some systems consist of cesspools, which are prohibited by the State OWTS policy.</p>
<p><b>Table 3-2 p. 69</b>  &lt; 5 MPI = Not Allowed</p>	<p><b>Inserted rows to indicate that percolation rates p. 73</b>  &lt; 1 MPI = not allowed  1 - &lt;5 MPI 20 feet minimum vertical separation</p>
<p><b>Table 3-2 p. 69</b></p>	<p><b>Added a row at beginning of Table to indicate p.73</b>  <b>Conventional Septic Tank with leach line, leach field, or infiltrative chamber percolation rate 1 - &lt;5 20 feet separation to groundwater</b></p>

<p><b>Table 3-2 p. 69</b> Seepage pit and gravel packed pits with supplemental treatment to meet or exceed secondary treatment and provide reduction in BOD/CBOD</p>	<p><b>Simplified language p. 73</b> Seepage pit and gravel packed pits with NOWTS and disinfection system.</p>
<p><b>Table 3.2 p. 69</b> Soil Replacement: the manufactured/engineered soil shall provide homogenized absorption capability, requires the use of a NOWTS system that uses pressurized drip tubing or other non-conventional methods of wastewater disposal.</p>	<p><b>Clarified that more than pressurized drip disposal system may be used with soil replacement. p.73</b> Soil Replacement: the manufactured/engineered soil shall provide homogenized absorption capability, requires the use of a NOWTS that uses disinfection and an alternate method of wastewater disposal.</p>
<p><b>Subdivision densities, p 71</b> The average OWTS density for any subdivision of property made by Tentative Approval pursuant to the Subdivision Map Act implemented under this Tier 2 LAMP shall not exceed allowable density values for a single-family dwelling unit, or its equivalent, for those units that rely on OWTS (Section 3.0).</p>	<p><b>Added the following language p. 75</b> The County will accept the use of NOWTS as a variance when the allowable density cannot be met.</p>
<p><b>Table 3-4, p 75-76</b></p>	<p><b>Added missing information p. 78-79</b> Added missing units of measure, renumbered footnotes, added language clarifying that monitoring wells installed for the purpose of monitoring a septic system do not have to comply with the setback requirement.</p>
<p><b>Seepage pits, p. 80</b> The installation of seepage pits for new construction requires the use of a NOWTS</p>	<p><b>Added the following language p. 83</b> with the exception of new construction meeting the following conditions, which will be allowed the use of a conventional OWTS: - One unit dwelling with maximum 4 bedrooms or 1,200-gallon tank. - All setback requirements are met. - The soil characterization does not include bedrock.</p>
<p><b>NOWTS Requirements, p. 84</b> In the County, NOWTS are required under the following conditions</p>	<p><b>Added the following language p.86</b></p>

	<p>In the areas of the County regulated by the Los Angeles Regional Water Quality Control Board, NOWTS are required to include a disinfection system under the following conditions</p> <p><b>Added the following bullet</b></p> <ul style="list-style-type: none"> <li>• For areas where the groundwater is known to have high level of nitrogen or pathogens and that can be attributed to high density of OWTS.</li> </ul>
<p><b>Horizontal Setbacks, p. 86</b> Horizontal Setback requirements for new developments using NOWTS are the same as the requirements for conventional systems (<b>Table 3-4</b>). Where the horizontal setbacks cannot be met for a replacement system, approval from the Director is required.</p>	<p><b>Added the following language p. 88</b> If approval is not granted, applicants can refer to the Regional Water Board for the issuance of a Wastewater Discharge Requirement (WDR). Jurisdictional Building and Safety requirements may still apply for the authorization to install the system regardless of the WDR.</p>
<p><b>NOWTS Design and Construction Requirements, p. 87</b></p>	<p><b>Removed the following language which was included in error p. 90</b> Additionally, the DPH requires that if the NOWTS includes a disinfection component, the effluent shall be tested for E. coli with an acceptable concentration of 2.2 MPN/100mL.</p>
<p><b>NOWTS Design and Construction Requirements, p. 88</b></p> <ul style="list-style-type: none"> <li>- Total Nitrogen – At least a 50% average reduction of influent TKN (Total Kjeldahl Nitrogen)</li> </ul>	<p><b>The following change was made p. 90</b></p> <ul style="list-style-type: none"> <li>- Total Nitrogen – At least a 50% average reduction of influent (Total Nitrogen)</li> </ul>
<p><b>NOWTS Design and Construction Requirements, p. 89</b> Sample shall then be taken to a laboratory certified for such analysis.</p>	<p><b>Provided the following clarification p. 91</b> Sample shall then be taken to a California Department of Public Health certified laboratory for such analysis.</p>
<p><b>NOWTS Design and Construction Requirements, p. 89</b> NOWTS owners with supplemental treatment must enter into an agreement with the County prior to approval of their systems.</p>	<p><b>Eliminated the redundancy p. 91</b> NOWTS owners must enter into an agreement with the County prior to approval of their systems.</p>

<p><b>Type of NOWTS Permitted, p. 91 - 92</b>  Section was redundant providing conditions when a NOWTS is required but not identifying the types of NOWTS permitted.</p>	<p><b>The entire section was rewritten as follows p. 91-92</b>  NOWTS have three components; a supplemental treatment system, a disinfection system when required by the DPH, and may have an alternate method of wastewater effluent dispersal.</p> <p>The supplemental treatment system can be either an aerobic treatment unit, a packaged treatment plant, other systems NSF 245 certified, or any systems approved by the DPH based on performance assessment to provide effluent quality equal to the standards for NSF 245 certification.</p> <p>For disinfection, the State OWTS Policy requires that supplemental treatment components be designed to provide sufficient pretreatment of the wastewater so that effluent from the supplemental treatment components does not exceed a 30-day average TSS of 30 mg/L and shall further achieve an effluent fecal coliform bacteria concentration less than or equal to 200 Most Probable Number (MPN) per 100 milliliters.</p> <p>Alternative methods of wastewater effluent can either be a pressurized dosing system, a mound system, a pressurized subsurface drip dispersal system, or other technologies meeting compliance.</p>
<p><b>Table 4-1 Summary of LA County Provisions for OWTS /NOWTS Inspections, Monitoring, Maintenance, and Repairs p.93</b>  NOWTS Operation – Annual Inspection by EH</p>	<p><b>Made the following change p. 93</b>  NOWTS Operation – Annual inspections by a qualified septic technician.</p>
<p><b>New OWTS/NOWTS installations, p. 98</b>  Pathogen removal is defined as achieving an effluent fecal coliform bacteria concentration less than or equal to 200 Most Probable Number (MPN) per 100 milliliters based and E. coli less than or equal to 2.2 MPN per 100 milliliters</p>	<p><b>Corrected an error where the test limit level was assigned as the limit of E. coli. p. 98</b>  Pathogen removal is defined as achieving an effluent fecal coliform bacteria concentration less than or equal to 200 Most Probable Number (MPN) per 100 milliliters based on analysis of total coliform with a minimum detection limit of 2.2 MPN per 100 milliliters.</p>

<p><b>Water Quality Assessment, p. 112</b> Water Quality Parameters of Concern. The initial focus of the water quality assessment program will be on nitrate.</p>	<p><b>Added the following language p. 112</b> Water Quality Parameters of Concern. The initial focus of the water quality assessment program will be on nitrate and fecal coliform bacteria.</p>
<p><b>Water Quality Assessment, p. 114</b></p>	<p><b>Added the following bullet at the end of the section p. 114</b> The laboratory analytical protocol for bacteria assessment will use the Most Probable Number (MPN) for the determination of fecal coliforms.</p>
<p><b>Reporting to RWQCBs, p. 114</b></p>	<p><b>Added the following p. 114</b> Number of cesspools encountered and replaced.</p>
<p><b>Supportive Rationale Tier 4 OWTS Requiring Corrective Action, p. A-3</b></p>	<p><b>Added the sentence</b> Owners of a perceived failed system will be directed to have their system evaluated to determine whether it has failed and the reason for the failure. Owners of failed OWTS will complete and submit an application form to the DPH in accordance with the Professional Guide.</p>
<p><b>Table A-2</b> <b>Seepage pits and gravel packed pits - With supplemental treatment to meet or exceed secondary treatment technology and provide reduction of BOD/CBOD.</b></p>	<p><b>Simplified language</b> Seepage Pits and Gravel-Packed Pits – With NOWTS and disinfection system.</p>
<p><b>A-5 Subdivision Densities</b></p>	<p><b>Added the following language</b> Exception to the subdivision densities requirements may be granted if an NOWTS is proposed.</p>
<p><b>A-6 Supplemental Treatment</b></p>	<p><b>Added the condition</b></p> <ul style="list-style-type: none"> <li>• For areas where the groundwater is known to have high level of nitrogen or pathogens and that can be attributed to high density of OWTS.</li> </ul>
<p><b>A-6, p. A-8</b> Additionally, the DPH requires that if the NOWTS includes a disinfection component, the effluent shall be tested for E. coli with an acceptable concentration of less than or equal to 2.2 MPN/100mL.</p>	<p><b>Corrected requirements as follows</b> Additionally, the DPH requires that if the NOWTS includes a disinfection component, the effluent shall be tested for fecal coliform bacteria with an acceptable concentration of less than or equal to 200 MPN/100mL.</p>

<b>A-6, p. A-8</b> <ul style="list-style-type: none"><li>- Total Nitrogen – At least a 50% average reduction of influent TKN (Total Kjeldahl Nitrogen)</li></ul>	<b>Corrected to read</b> <ul style="list-style-type: none"><li>- Total Nitrogen – At least a 50% average reduction of influent (Total Nitrogen)</li></ul>
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