

## Section 10: STATE AND REGIONAL POLICY RECOMMENDATIONS

This Section focuses on State and regional policy recommendations to further the implementation of wastewater best practices in the Metro Water District. These recommendations are intended for State and regional agencies, and require no action on the part of local governments or local wastewater providers. Implementation of these policy recommendations is intended to advance the progress towards addressing integrated water resources protection within the Metro Water District. The recommendations identify actions to be taken, the agency to lead the action, and the year for the action to begin (shown in parentheses).

### WASTEWATER PERMITTING

Within Georgia EPD, there are four different programs within the Watershed Protection Branch that play an active role in wastewater permitting.

- The Engineering and Technical Support program review and approve engineering reports, plans and specifications for wastewater treatment facilities and sewer system extensions.
- The Permitting Compliance and Enforcement program issues NPDES and Land Application permits to municipal, industrial, federal, and privately owned water pollution control plants.
- The Watershed Planning and Monitoring program performs water quality modeling for wasteload allocations, water use classifications, and water quality standards in Georgia.
- The TMDL Implementation program reviews watershed assessment plans.

Wastewater permits are issued under the same branch as permits for water supply and water withdrawals. While consolidation of these permits and permit requirements such as reporting may not be practical, Georgia EPD should continue its current efforts to improve coordination and communication among the groups handling these permits in order to expedite projects included in the Wastewater Management Plan. Recommendations for coordination and communication include the following:

- Permit reviews. Wastewater permit applications with minor review comments from Georgia EPD should be given priority in the re-review cycle. Permits have traditionally been reviewed on a first come, first serve basis. If additional information or clarification is required to process permit applications, applicants should not be placed at the end of the queue for review upon re-submittal. Re-submittal reviews should recognize the date of the initial review submittal. (2009 – 2010)
- Consolidate permit cycle. Wastewater discharge permits are typically issued on a five-year cycle and water permits are issued on a ten-year cycle. Georgia EPD should allow local providers to consolidate permits or slightly adjust the permit cycles to be coordinated by river basin. (2009 – 2011)

## Section 10: STATE AND REGIONAL RECOMMENDATIONS

---

- Consolidate and standardize reporting. Local wastewater providers have several reporting requirements, such as NPDES permits and watershed monitoring reports. These reports can be simplified to meet multiple requirements. Revisions to permit reporting could include web-based reporting or other recommendations resulting from the Georgia Association of Water Professionals (GAWP) Watershed Streamlining Task Force. (2009 – 2010)
- Consolidate wastewater permit storage. Currently, some permits are maintained at the Georgia EPD central office, while some of the smaller facility permits are retained at the regional Georgia EPD offices. Records for both private and municipally-owned systems should be maintained in one centralized repository and one permit database to provide accessibility and consistency in data. (2009)

### WASTEWATER RETURNS

This Wastewater Management Plan outlines the future demand for wastewater treatment within the Metro Water District. The Comprehensive State-wide Water Management Plan recognizes the value of returning wastewater flows to local waterbodies so that it is available for instream and downstream uses and users. The current anti-degradation requirements and lack of assimilative capacity in some cases, limit the volume of return flow through highly treated wastewater effluent. The following recommendations should be considered by Georgia EPD related to facilitating return flows within the Metro Water District:

- Georgia EPD should encourage and facilitate the return of highly treated effluent to local waterbodies so that it is available for instream and downstream uses and users. (ongoing)
- Modify the existing anti-degradation policy to allow for wastewater discharges in areas with sufficient assimilative capacity to receive highly treated effluent. (2009 – 2010)
- Provide incentives for communities who improve water quality providing additional assimilative capacity or convert from a more consumptive treatment method (LAS, septic, decentralized) to a less consumptive method. (2009 – 2010)

### PRIVATE WASTEWATER FACILITIES

Currently, a private entity can get a wastewater permit unless there is a local policy prohibiting these facilities. Local governments should develop their own ordinances to regulate private facilities. Private wastewater facilities are not required to develop and implement watershed assessments and watershed protection plans under their permits, as public systems are required to do. Although private systems tend to be much smaller than public wastewater systems, if a community grows with a number of private systems there can be a significant impact to water quality. Most private systems are based on land application systems that do not efficiently return flows for instream and downstream uses and users. As a state-wide issue, Georgia EPD, through implementation of the Comprehensive State-wide Water Management Plan, should consider the following policy changes:

- Require decentralized systems in the Metro Water District to comply with the same requirements as municipal wastewater permittees, such as the implementation of watershed assessments and watershed management plans to the extent that private facilities are capable of implementing such requirements since they cannot pass ordinances to implement some aspects of the programs that cities and counties can do. (2009 – 2011)

## Section 10: STATE AND REGIONAL RECOMMENDATIONS

---

- Track the approximate flow from private systems so that their impact can be more readily understood on water quantity and quality. (2009 – 2011)

### COMPREHENSIVE LAND USE PLAN COORDINATION

Georgia Department of Community Affairs (Georgia DCA) is responsible for overseeing required Comprehensive Land Use Plans under the Georgia Planning Act.

Georgia DCA currently reviews Comprehensive Land Use Plans (CLUPs) for compliance with the Metro Water District Plans. The local CLUPs direct where growth will occur locally and should be coordinated with local wastewater providers. Local governments, through Section 7 of this Plan, are required to plan for future areas that will be developed on septic systems. Planning for septic systems should be included as a requirement of CLUP plans as the staff setting future land use direction should be cognizant of the impact on water quality and quantity.

The following recommendations should be considered by Georgia DCA related to required Comprehensive Land Use Plan reviews:

- The new Comprehensive Land Use Plan review audit checklist should be updated as needed to encourage coordination between land use planning and wastewater planning in accordance with this Wastewater Management Plan. (2009)

The Department of Community Affairs should consider adding additional minimum planning requirements related to future growth on septic systems. (2009)

### SEPTIC SYSTEM PLANNING AND COORDINATION

The Georgia Department of Human Resources (Georgia DHR) is responsible for setting standards for the installation of septic systems and post-construction inspections of septic systems. The Georgia DHR is also responsible for working with homeowners on addressing failed septic systems. As growth on septic systems can impact wastewater facility operations and failure of septic systems can have an impact on watershed health they play an important role in implementation of both the Wastewater Management Plan and the Watershed Management Plan.

The following recommendations should be considered by Georgia DHR:

- County Board of Health professionals should participate in annual meetings with local governments and local wastewater providers. (2009 and ongoing)
- Local governments under this Plan are required to identify critical areas that may not be appropriate for septic systems or where additional management of septic systems is needed. County Board of Health professionals should work with the local jurisdictions to identify these critical areas and support the additional management measures that local jurisdictions require in these critical areas. (2009 and ongoing)
- Consider amending current law to allow establishment of maintenance requirements for non-mechanical residential onsite sewage management systems (i.e. septic systems). Per O.C.G.A. § 31-3-5, the Georgia DHR is not allowed to regulate ongoing maintenance of non-mechanical residential onsite sewage management systems, including traditional septic systems. This

## Section 10: STATE AND REGIONAL RECOMMENDATIONS

---

limitation should be removed so Georgia DHR is able to require maintenance on all septic systems. (2009)

- To better manage and track septic system permits, repairs and failures, the Georgia DHR should create a database for septic systems in Georgia. The County Board of Health should use this database to track septic system permits, repair activities and system failures. (2010)
- Georgia DHR needs to develop a program to address professionals who perform poor soil classifications. Develop a method to enforce or correct consistent mistakes made by installers, pumpers, and soil classifiers. More aggressive action is needed by the State to de-certify contractors and poor soil classifiers. (2010)
- Georgia DHR needs to develop clear definitions and guidelines on how to properly label extra rooms on building plans and how they should be included in the design, planning, and permitting process. Septic systems are sized based on the number of bedrooms, therefore proper labeling on house plans can impact functionality. Rooms that are not labeled as bedrooms are often used as bedrooms leaving the septic system undersized for the actual demand. (2009)

### WASTEWATER PROGRAM EVALUATION

It is important to assess the progress towards implementation of the Wastewater Management Plan. Therefore, the Metro Water District should work through the Technical Coordinating Committee, and if necessary, a sub-committee of the TCC to discuss options for measuring progress to improve the Metro Water District annual progress reports. Metro Water District staff should facilitate discussions to establish additional methodologies for measuring progress of the Wastewater Management Plan (2009 – December 31, 2010).