COUNTY OF NAPA
LOCAL AGENCY MANAGEMENT PROGRAM
PART 3
ADDITIONAL CONSIDERATIONS

Responsibilities and Duties

3.3 Annual Report. Napa County shall submit a report to the Regional Water Quality Control Board (RWQCB) that includes the following information:

- Number and location of complaints, complaint investigations and outcomes
- Permits issued for septic tank pumper trucks (Napa County Code Chapter 5.2)
- Number, location, and description of permits issued for new and replacement OWTS with Tier indicated

As required by the adopted State OWTS Policy, because Napa County's jurisdictional area is within the boundary of both the Central Valley RWQCB (CVRWQCB) and the San Francisco Bay RWQCB (SFRWQCB) a copy of the report shall be sent to each.

3.4 Permanent Records- Installation permit records are maintained in the Accela Automation database which includes information on the Tier under which the permit was issued. Annual operating permit information for alternative sewage treatment systems is maintained in the Digital Health Department database. Permit information can be extracted from either database within 10 working days upon written request for review by any RWQCB.

3.5 DEH shall notify the owner of a public well or water intake by telephone, email and/or site visit as soon as practicable but no later than 72 hours, upon discovery of a failing OWTS within the allowable setbacks as follows:

OWTS Policy Section 7.5.6: 150' from a public water well where the depth of the effluent dispersal field does not exceed 10'

OWTS Policy Section 7.5.7: Within 1200' from a public water system surface water intake if the failing system is 400 feet or less from high water mark

OWTS Policy Section 7.5.8: Within 2500' from public water system surface intake if the failing system is 200' or less from high water mark

Public Water Well and Public Water System shall have the meaning as found in the State OWTS Policy.

All public water system wells and surface water intake locations will be captured in the County GIS database within six (6) months of LAMP approval. Water systems to be notified shall be determined using the appropriate GIS buffer based on the location of the failing OWTS. Until mapping is complete, EH land use staff will consult with the consumer protection division on locations of public water system wells and water intake locations.

Tier 2 LAMP

9.0 Local Agency Management Program for Minimum OWTS Standards

This LAMP establishes minimum standards that provide an alternate method from Tier 1 to achieve the same policy purpose of protecting water quality and public health.

9.1 Considerations for LAMP

9.1.1 Degree of vulnerability to pollution from OWTS due to hydrogeological conditions. Napa County will begin to collect monitoring data after approval and implementation of the LAMP as a part of the Alternative Sewage Disposal System monitoring program winter inspections. If evidence indicates a hydrogeologically vulnerable area, the LAMP will be updated based on the data collected during the five (5) years between LAMP assessment reports.

All designs for new sewage dispersal systems require a site evaluation to be conducted by a qualified professional. Such professionals will generally consider site specific soil application rates of the least permeable relevant soil horizons, best available evidence of shallowest seasonal groundwater (including but not limited to soil mottling and direct observation), threats to sensitive receptors such as wells and surface water, and potential geotechnical issues.

9.1.2 High quality waters and other environmental conditions. Minimum parcel sizes are dictated by Napa County Code Section 13.32.040 and Table 18.104.010. All zones except for Commercial Limited (CL) and Commercial Neighborhood (CN) have a minimum parcel size of 10 acres which is substantially larger than the densities considered in Table 1 of Section 7.8 of the OWTS policy and as such are more protective of groundwater and the environment. CL and CN zones have a minimum parcel size requirement of 1.0 acre (unless public water is available and as allowed in Section 13.32.040, may be as small as a half-acre). CL and CN zoned land combined makes up only 0.05% of the land in the County.

Additionally, the average annual rainfall in Napa is 25”/year and according to Table 1 that density would be 1.0 dwelling unit/acre. Existing geographic areas with existing higher densities that predate current code requirements are considered as Tier 0 and will remain as such until or unless a failure is documented, in which case the failure will be mapped and the system will be repaired per the requirements of this Tier II LAMP.

9.1.3 Shallow soils requiring a dispersal system installation that is closer to ground surface than is standard. Napa County OWTS Technical Standards requires a qualified professional perform site evaluations. If shallow soils are found an alternative sewage treatment system (ASTS) shall be designed and installed in accordance with Napa County OWTS Technical Standards. Napa County OWTS Technical Standards require conventional systems to have a minimum of 12” of soil cover which may be acceptable fill material. If unable to provide a minimum of 12” of soil cover over conventional dispersal system due to shallow soil depth and still provide 36” minimum suitable soil below trench bottom, an alternative sewage treatment system is required.

9.1.4 High domestic well usage area. Napa County staff will GPS all new well location sites over the next five (5) years. If a pattern of areas with high domestic well usage develops, consideration will be given to further study these areas relative to areas identified as having a

high incidence of sewage dispersal system failure or potential for soft failures with pathogen transport toward receptor wells. Considering the low density that results from our minimum parcel sizes this is not likely to be an issue.

9.1.5 Fractured bedrock. Napa County OWTS Technical Standards requires a qualified professional perform site evaluations. If shallow soils are found due to fractured bedrock, an alternative sewage Treatment system (ASTS) shall be designed and installed in accordance with Napa County OWTS Technical Standards. A minimum of 2 feet of acceptable soil between the dispersal area and the fractured bedrock is required for the design of any ASTS. Specific ASTSs with advanced treatment (mound, aerobic treatment, etc.) are suitable for sites with only 2 feet of soil between the dispersal area and the limiting condition.

9.1.6 Poorly drained soils. Napa County OWTS Technical Standards requires a qualified professional perform site evaluations. If poorly drained soil is identified, limiting the amount of acceptable soil, an alternative sewage dispersal system (ASTS) shall be designed and installed in accordance with Napa County OWTS Technical Standards. A minimum of 2 feet of acceptable soil above the poorly drained soils is required for the design of any ASTS. Specific ASTSs with advanced treatment (mound, aerobic treatment unit, etc) are suitable on sites with only 2 feet of soil. Other options for improving drainage may be identified during the site evaluation. An example would be the requirement to construct an interceptor drain if located on a sloping site.

9.1.7 Vulnerable surface water. Napa County Code requires a 200 foot setback to any water supply watershed reservoir. Code will be modified to require a 400 foot setback if the disposal system is located less than 1200 feet to a public water system intake line. The areas around our surface water supplies are sparsely populated except where public sewer is available.

9.1.8 Impaired water bodies. Napa River has an approved TMDL and is not subject to Tier 3 requirements. We will however continue to implement the provisions identified in 9.2.2 as required per our approved TMDL.

9.1.9 High OWTS density areas. Nitrate has not been identified as a chronic issue in any area of Napa. Should monitoring results (see comprehensive monitoring plan in section 9.3.2) or data analysis show a concerning trend over the next five years for nitrate contamination this LAMP will be reevaluated and updated as needed to consider nitrogen loading per area. Napa County Code Section 13.04.040 will be updated to include the requirement for total and fecal coliform testing as well as nitrate testing whenever a yield test is required for new development.

9.1.10 Limits to parcel size. Minimum parcel sizes are dictated by Napa County Code Table 18.104.010 and Chapter 13.58. All zones except for Commercial Limited and Commercial Neighborhood (which combined make up only 0.05% the total land area in the County) have a minimum parcel size of 10 acres which is substantially larger than the densities considered in Table 7.8 of the OWTS policy and as such are more protective of groundwater and the environment. County Code requires dedicated replacement areas for all newly created parcels or adjusted parcels.

No parcel shall be improved beyond its capacity to properly provide for a code compliant sewage disposal system (County Code 13.40.050).

9.1.11 Areas with OWTS that predate adopted standards are dispersed throughout the County. Existing conditions are allowed to continue as is under Tier 0 until or unless a failure is

identified. These failures will be captured in a data base and mapped to a GIS layer. If a particular area with OWTS that predate adopted standards is identified during the 5 years between LAMP assessment reports as being one with a significantly higher number of failures, the LAMP will be updated as needed to address and include special considerations for continued protection of groundwater and the environment.

9.1.12 Areas with OWTS either within prescriptive, Tier 1 setbacks, or within setbacks that a Local Agency finds appropriate. There are no areas in Napa County with known multiple, higher density developments with existing OWTS that are within the prescriptive setbacks set forth in Tier 1. Those that may exist are limited and dispersed throughout the County with no known concentrations of systems of this type.

9.2 The Napa County LAMP shall cover residential Onsite Wastewater Treatment Systems (OWTS) and commercial OWTS producing flows of 5,000 gallons-per-day or less of domestic waste. The LAMP shall provide regulations/guidelines for the local site evaluation conducted by a qualified professional, siting, design, construction monitoring and maintenance requirements (see Napa County OWTS technical standards). It additionally covers each of the following:

9.2.1 Installation and inspection permits. The LAMP provides requirements for OWTS inspection, monitoring, maintenance, and repairs, including procedures to ensure that replacements or repairs to failing systems are done under permit from Napa County Environmental Health Division (see Chapter 13.32 of County Code related to repairs and variances). Refer additionally to Napa County OWTS technical document. All new installations require a plan review, installation permit and construction inspections. Additionally all new ASTS and private sewage disposal systems require annual operating permits and routine inspections by either County staff and/or a service provider. A standard operation and maintenance manual (O&M) will be provided by the County for conventional sewage disposal systems. All ASTS systems will have an O&M manual prepared by the design professional.

9.2.2 In 2007 the SFRWQCB and the State Water Resources Control Board (SWRCB) adopted an amendment to the Water Quality Control Plan (Basin Plan) for the San Francisco Bay Region to establish a Napa River Watershed Pathogen Total Maximum Daily Load (TMDL) and Implementation plan. The adopted TMDL designated Napa County, specifically the Department of Environmental Management (Now Planning, Building and Environmental Services (PBES)) as the responsible party for implementing actions related to OWTS and required a plan and implementation schedule be submitted to the SFRWQCB by January 31, 2008. This plan was submitted on January 17, 2008 and is shown in Appendix A of the Napa County TMDL Report.

Existing, new and replacement OWTS near the Napa River have been addressed with the implementation of this TMDL. Although the TMDL report data indicated that failing OWTS were not contributing to creek contamination at the time, Napa County proposed and has continued the following activities:

- All parcels with septic systems bordering Murphy and Browns Valley Creeks are flagged in Garrison Digital Health (alternatively done in Accela which is County's current septic permit tracking system) as being adjacent to an impaired water body. This will trigger extra diligence from County staff in reviewing and septic system related permit or inquiry.
- Should any parcel near the impaired creeks be identified as having a failing septic system, the County will expeditiously use all tools at its disposal to

immediately remedy the situation and shall be done in compliance with Chapter 13.32 of Napa County Code.

- The County will continue to work closely with the Napa County Resource Conservation District, which conducts watershed activities in the area, to determine if their activities identify any septic system issues near the affected creeks. Section 9.2.2 and 9.2.9.
- The County will do a biennial re-mailing of the informational OWTS brochures to Murphy creek homeowners in order to remind current homeowners and inform new homeowners of the creek's impaired status. Section 9.2.5.
- The County will continue current policy that requires property owners in the Brown's Valley area to connect to the sanitary sewer following septic system failure or for new development.
- The County will review the sampling data as it becomes available to determine if any areas exhibit notable increases in indicator bacteria levels.
- The County will provide brochures and other written information similar to that found in Appendix H of the TMDL Report (attachment #) at appropriate community events. Section 9.2.5
- As controllable sources of bacterial contamination within the County's purview are identified, the County will address using the full extent of its authority.

9.2.3 The LAMP recognizes that not all new, replacement, or repair OWTS will be able to meet minimum required setbacks, soil depth, groundwater separation, and/or additional minimum requirements and has therefore provided for a variance section to address such circumstances (see Chapter 13.32 of Napa County Code). Variances will not be permitted for cesspools of any kind or size or for new, replacement, or repair OWTS where public sewer is available. The variance process will not authorize any of the prohibited items in Section 9.4 of the Policy.

9.2.4 The LAMP provides educational, training, certification, and/or licensing requirements that will be required of OWTS Service Providers, Site Evaluators, Designers, Installers, Maintenance Contractors, and any other person relating to OWTS activities (see "Definitions" of the Napa County Code).

9.2.5 The LAMP provides a plan for an education and outreach program including informational materials to inform OWTS owners about how to locate, operate, and maintain their OWTS. Additionally see section 9.2.2 above. Property owners are further advised to visit Napa County's Public Website www.countyofnapa.org) as well as the State Water Board website for publications (e.g. Basin Plan prohibitions) regarding OWTS restrictions within its jurisdiction.

Regarding education related to ongoing operation and maintenance, alternative OWTS designers must provide the homeowner with an operation and maintenance manual specific to the type of system installed. Verification of delivery of a copy of the operation and maintenance manual must be documented in the final letter from the design professional. The County will retain an electronic copy of the operations manual for future replacement needs. The operation manual shall cite homeowner or Service Provider procedures to ensure maintenance, repair, or replacement of critical items within 48 hours following failure. Napa County will provide an operations manual to homeowners that install a conventional system.

Volunteer well monitoring programs available within Napa County include those coordinated by Napa County Public Works, Water Conservation Division. All outreach

programs developed shall include information on how well owners may participate by contacting the Water Conservation Division directly.

9.2.6 Septage receiving facilities for septage generated from within Napa County are available throughout the Bay Area, in particular, Napa Sanitation District, Vallejo Sanitation and Flood Control District and East Bay MUD.

Currently, there are approximately 49,700 legal parcels within Napa County. Of those, approximately 36,875 are assumed to be served by a municipal sewer district. The remaining 12,825 parcels are either served by an onsite sewage treatment system or have yet to be developed. To date, approximately 4,500 of these parcels are vacant. Assuming all 12,825 parcels become developed with onsite wastewater treatment systems and the septic tanks (assume 1500 gallon capacity) are pumped once every five years, approximately 10,500* gallons of septage per day would need to be hauled to a septage receiving facility. Assuming the average pumper truck can transport approximately 1500 gallons at a time, seven truckloads would be required each day.

Napa Sanitation District currently accepts an average of 5 truckloads per day of septage, but has maximum capacity to accept up to 50 truckloads per day. That capacity will continue to be available even as urban development continues with planned infrastructure improvements at Napa Sanitation District. Napa County septage haulers also frequently dispose of septage at Vallejo Sanitation and Flood Control District as well as East Bay MUD. Therefore, the available capacity at these receiving facilities is adequate for current and future needs.

* 12,825 parcels x 1500 gallons = 19,237,500 gallons / 5 years = 3,847,500 gallons/year
3,847,500 gallons/year / 365 days = approx. 10,500 gallons/day

9.2.7 Presently there are no onsite wastewater maintenance districts in Napa County and currently none are under consideration. Napa County Code Section 13.58.120 prohibits the development of a subdivision using individual sewage disposal systems where such subdivisions can be connected to an existing public sewer system. County Code further restricts the creation of small lot subdivisions (by minimum parcel size requirements) which geographically restricts the possibilities for an onsite wastewater maintenance district.

Should a proposal be submitted in the future for any onsite wastewater maintenance district and/or community type wastewater solution in a particular area, feasibility studies would have to include, as project alternatives, consideration of such formation in accordance within the provisions of Health and Safety Code.

9.2.8 Napa County Planning, Building and Environmental Services will participate and coordinate with Napa County Public Works on any Salt and Nutrient Management Study undertaken. Napa County will consider collaborating with regional efforts on a Salt and Nutrient plan if asked to participate in the future.

9.2.9 The County will continue to work closely with the Napa County Resource Conservation District, which conducts watershed activities in the area, to determine if their activities identify any septic system issues near local water ways or issues specifically pertaining to the Napa County TMDL (See section 9.2.2 above).

9.2.10 The LAMP includes procedures for evaluating the proximity of public sewer systems to new or replacement OWTS installations (See County Code Sections 13.20.040-060). Currently sewer district boundaries are mapped and if a property is close to a boundary,

staff will consult with the district prior to issuance of any permits. Parcels within designated service areas will not be issued a permit until or unless the district issues a waiver based on specific conditions (see County Code Chapter 13.20).

9.2.11 The County will notify the owner of a public water system prior to issuing an installation permit for any new, replacement, or repair OWTS in such cases that the OWTS is; within 1200 feet of an intake point for a surface water treatment plant for drinking water, is in the drainage area catchment in which the intake point is located, and is located such that it may impact water quality at the intake point such as upstream of the intake point for a flowing water body, or if the OWTS is within a horizontal sanitary setback from a public well. See section 3.5 above and County Code table 13.28.040.

Napa County staff, during regulated water system inspections for the 2015-2016 fiscal year will use GPS to identify all parcels having public water systems and will identify all public water system wells, surface collection reservoirs and surface water intakes. Additionally, staff will coordinate with City jurisdictions to identify those large public water systems as well. This data will be used to create a GIS data base layer for use upon approval of this LAMP. Any new OWTS within 1200 feet of a located public water supply will be identified using GIS buffers and will require notification prior to permit issuance.

9.2.12 The LAMP outlines policies and procedures to be followed when a proposed OWTS dispersal area is within the horizontal sanitary setback of a public well or a surface water intake point. These policies and procedures establish best available technology and siting practices which shall mitigate the potential adverse impact to the public water source (County Code section 13.28.040 and 13.32.050).

New or replacement OWTS shall meet a minimum horizontal setback of 150 feet from a public water well where the depth of the effluent dispersal system does not exceed 10 feet in depth. Napa County does not allow any OWTS with effluent dispersal deeper than 10 feet.

For replacement OWTS that do not meet the above horizontal separation requirements, the replacement OWTS shall meet the horizontal separation to the greatest extent practicable. In such case, the replacement OWTS shall utilize supplemental treatment and other mitigation measures, unless the permitting authority finds that there is no indication that the previous system is adversely affecting the public water source, and there is limited potential that the replacement system could impact the water source based on topography, soil depth, soil texture, and groundwater separation

For new OWTS, installed on parcels of record existing at the time of the effective date of this Policy that cannot meet the 150 horizontal setback to a public water supply, the OWTS shall meet the horizontal separation to the greatest extent practicable and shall utilize supplemental treatment which may include disinfection for pathogens and other mitigation measures as described in the LAMP and County Code Chapter 13.32.

9.2.13 Cesspools are not permitted in Napa County and any Cesspool discovered shall be properly abandoned and a repair or replacement system installed as soon as practicable.

9.3 Minimum Local Agency Responsibilities

9.3.1 OWTS that are granted a variance will be mapped on the PBES GIS "OWTS" layer. If a permit is issued based on County Code Chapter 13.32 for a variance or repair, this will be captured in the permitting data base application specific information (ASI) fields and identified on the OWTS layer. Information on the number, location and description of permits can be queried in a report as needed.

9.3.2 Water quality assessment program

GIS layer for data management- OWTS layer will be used to capture the location of systems for which a variance was granted and for which a repair was installed.

Failures. There are several ways in which failures are identified. In some instances a property owner will work with a contractor who in turn works with the County on a repair. In other instances, a complaint is received about a possible failing septic system and will be logged into the County DHD database (see below). Failures that result in the issuance of a repair permit will be captured in Accela and mapped to the OWTS layer as a repair.

Complaints are currently logged to the DHD data base. As a part of this LAMP, these complaints will be mapped to the OWTS layer as a 'complaint'. Upon receipt of a complaint, an investigation will be conducted. Based on the outcome of the investigation, a repair permit may be required.

Inspection data. All ASTS systems are inspected either by a service provider or County staff (or both). Information from the inspection reports is captured electronically in the DHD data base. Key fields will be used to identify failing systems and this information will be mapped to the OWTS layer as an 'inspection failure'. Additionally, service providers are required to report results of inspections electronically. Any systems for which an actual failure is identified by the service provider will also be mapped to the OWTS layer and identified in the same manner.

Periodic sampling of OWTS monitoring wells. County staff will develop a groundwater monitoring program that will be used to evaluate groundwater levels and identify constituents of concern (ie nitrates and pathogens) within and in the vicinity of OWTS dispersal areas. Using the County GIS mapping tools, areas for periodic sampling will be identified based upon such factors as location, topography, and OWTS density. Within each area, certain OWTS may be chosen for routine groundwater level monitoring, and random quality samples will be taken from a selected number OWTS. Monitoring and sampling will be completed during the winter months and the information shall be collected and stored for further evaluation and mapping.

It was discussed that the State would be compiling all the data they currently have from other sources (drinking water program, Geotracker, GAMA, etc) and will make that information available in a useful format for local agencies to include in their LAMP as a part of surveillance and water quality assessment activities. This LAMP will be updated to include action to be taken upon availability of this compiled data.

The above information will be evaluated during the 5 years between LAMP assessment reports. Any trends identified on the mapping will be used to modify the LAMP if determined necessary. Any trends identified as a result of the consolidated information made available by the State will be further considered along with the trends identified from the mapping for future program improvements and changes.

9.3.2.1 Domestic well sampling-County Code Section 13.04.040 is being modified to require total and fecal coliform testing and nitrate testing on all individual supplies when a yield test is required for development. This information will be captured in a data base and mapped to a GIS layer where the MCL is exceeded.

9.3.2.2 Real estate transactions-no information is captured at this time and there are no plans to require this in the future.

9.3.2.3 Napa County Environmental Health staff is the LPA overseeing the small public water system program. Public Water Systems will continue to conduct water quality sampling as required by the small water system program. Environmental Health Staff reviewing water quality data for the small water system program will alert Environmental Health staff working in the LAMP program if results reveal some change in groundwater quality that may stem from a sewage treatment system related problem. Additionally, LAMP program staff will alert water system program staff in the event of a failure at a site or close to a site of a small public water system.

9.3.2.4 New Development- County well ordinance (Section 13.04.040) will be amended to require well sampling for total and fecal coliform and nitrates when a yield test is required prior to new development. This information will be captured in our permitting data base and mapped to a GIS layer when the MCL is exceeded.

9.3.2.5 Public beaches-N/A no beach sampling proposed.

9.3.2.6 Sampling related to NPDES permits. County Environmental Health Staff will continue to work with County Public Works staff in the area of overall water quality monitoring, sampling and data collection. Currently NPDES sampling is specific to that program however this may be expanded as part of an ongoing collaborative effort over the next several years. As this evolves, any changes or additions to the water quality monitoring and assessment will be evaluated and the LAMP revised as needed.

9.3.3 **Annual Report**. No later than February 1st of each year, County will submit to the SFRWQCB, with a copy to the CVRWQCB, a report in tabular, spreadsheet form summarizing the status of the following items:

1) The number and location of complaints pertaining to OWTS and how the complaints were resolved. (LAMP 3.3, 9.3.2)

2) Applications and registrations issued as part of the County septic tank cleaning registration (pumper truck) program pursuant to Section 117400 et. seq. of the California Health and Safety Code and Chapter 5.20 of the Napa County Code. (LAMP 3.3.)

3) The number, location and description of permits issued for new and replacement OWTS and under which tier the permit was issued. (LAMP 3.3)

4) Number, location and description of permits issued for OWTS where a variance is granted. (LAMP 9.3.1)

5) Results of water quality assessment program. (9.3.2)

Five Year Water Quality Assessment Report. Every five years the annual report to the SFRWQCB and CVRWQCB will be accompanied by a Water Quality Assessment Evaluation Report that summarizes the information and findings from the Water Quality Assessment Program (9.3.2) The report will provide an assessment of any evidence of water quality impacts from OWTS along with any recommended changes to the LAMP to address the identified impacts.

The Water Quality Control Board is expecting to issue a guidance document on how this information should be gathered and organized for submittal. Upon receipt of such guidance, this section of the LAMP can be updated to include specifics identified. Any water quality data generated by the County from monitoring activities will be submitted in an electronic data format as required.

9.4 Prohibitions-Components Not Allowed or Authorized in LAMP

9.4.1- Cesspools

Cesspools are not permitted for new construction in Napa County. Any Cesspool discovered shall be properly abandoned and a repair or replacement system installed as soon as practicable (Napa County Code 13.16.500, 13.20.010, 13.56.040).

9.4.2 Projected Flow greater than 5,000 gallons per day

The Napa County LAMP applies to OWTS producing flows of less than five thousand (5,000) gallons per day (Napa County Code 13.16.010). If the proposed flow is greater than five thousand (5,000) gallons per day the method of treatment and disposal shall be approved by either the SFRQWCB or the CVRWQCB.

9.4.3 OWTS with surface discharge. Napa County will NOT allow any surface discharge of sanitary wastewater. All proposed surface disposal of sanitary effluent shall be under the jurisdiction of the SFRWQCB or CVRWQCB.

9.4.4 Installations on slopes greater than 30% are prohibited without a registered professional's report (Napa County Code 13.48.030, Napa County OWTS Technical Standards).

9.4.5 Sizing reduction and decreased leaching area for International Association of Plumbing and Mechanical Officials (IAPMO) certified dispersal systems is not allowed (Napa County OWTS Technical Standards).

9.4.6 Supplemental treatment without Monitoring and Inspection is not allowed. All systems with supplemental treatment (ASTS) require annual permitting and monitoring as well as inspection by either a service provider or County or both (Napa County OWTS Technical Standards Part III).

9.4.7 Significant Waste from R.V. Holding Tanks-Napa County Code (13.16.116) defines domestic wastewater to include only incidental RV holding tank dumping but does not include wastewater consisting of a significant portion of RV holding tank wastewater such as a RV dump station.

9.4.8 Encroachment above groundwater. The absolute minimum amount of soil allowed for installation of any type of sewage dispersal system is two (2) feet between the dispersal area and the limiting layer, including groundwater (Napa County OWTS Technical Standards).

9.4.9 Installations near existing sewers. Napa County Code (13.20.050) defines unavailability of public sewer and when connection will be required.

For any property where the installation of a new, expanded or replacement OWTS is proposed, Napa County Code Section 13.20.030 and 13.20.050 require connection to a public sewer when the nearest building proposed on any lot or parcel is no more than 200' from a public sewer and will not require the installation of a pump station which is not maintained by the sewer district.

9.4.10 Minimum setbacks identified in 9.4.10 (9.4.10.1-9.4.10.5 and County Code Table 13.28.040) shall be maintained unless authorized through the repair/variance process (9.4.11, 9.4.12 and Napa County Code Chapter 13.32).

9.4.11 Supplemental Treatment, Replacement OWTS that do not meet minimum setback requirements.

For replacement OWTS unable to meet the horizontal setback requirements of 9.4.10.1-9.4.10.5, the replacement dispersal field shall meet the setback requirements to the greatest extent practicable as set forth in County Code Chapter 13.32 and shall incorporate supplemental treatment and other measures, as appropriate, unless there is no evidence of an existing or potential threat of impact to the public water source by the OWTS based on topography, soil depth and composition, and ground water conditions. When the established horizontal setbacks cannot be met, in no case shall a repair sewage system be installed any closer than the existing system to a public water supply well or public surface water intake point.

9.4.12 Supplemental Treatment, New OWTS That Do Not Meet Minimum Setback Requirements.

For new OWTS on parcels created prior to the effective date of the LAMP that are unable to meet the horizontal setback requirements of 9.4.10.1- 9.4.10.5, the new dispersal field shall meet the setback requirements to the greatest extent practicable. Per County Code Chapter 13.32, an alternative sewage treatment system with supplemental treatment shall be required and shall be sited to meet the required setback to the maximum extent possible. Supplemental treatment with disinfection may be required when deemed necessary by the administrative authority for protection of the water supply. In no case shall a new sewage system that is a result of new construction be installed any closer than 100 feet to a public water supply well or public surface water intake point.

9.5 Technical Support of LAMP

The LAMP including all technical documents includes adequate detail, to support how all the criteria in this local program work to protect water quality and public health.

9.6 The SFRWQCB will consider past performance of local programs to protect water quality based on reviews of annual status and evaluation reports. Should deficiencies be identified, the County and the SFRWQCB will work together to make programmatic improvements.