

Appendix 4-2

Criteria for Establishing Consistency for Community Plans for Wastewater Treatment

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All communities in the NOACA WQMP area were surveyed by mail to provide information on how they want their community's wastewater to be treated out into the future. A series of options was presented to them from which they could select one or more for various portions of their community. The list of available options is contained in Table 4-3.

The following criteria have been established to guide the determination of consistency with the WQMP for any proposed wastewater treatment expansion. In a limited number of cases, communities have selected options that supplement the general statements made below. These community specific options are identified in Table 4-4. Community specific options modify or replace the general criteria as appropriate. The accompanying Figures 4-6 to 4-10 show the generalized options selected by local jurisdictions.

Criterion 1: Central sewers that do not connect to the POTW that serves the Facility Planning Area in which a proposed project area lies are inconsistent with the WQMP without the expressed permission of the resident municipality in incorporated areas, and the County in unincorporated areas, and the Designated Management Agency that owns or operates the applicable POTW if different from the resident community. On-site wastewater system installations, repairs, or up-grades are consistent with the WQMP in areas where sewer plans exist to meet service needs until sanitary sewers are available.

Under the WQMP an area is considered to be "currently sewered" if adequate wastewater capacity exists at a POTW to treat the wastes generated in the area, and an adequate collection system is in place to transfer those wastes to the POTW. There may be pockets of unsewered properties within this classification. Often these properties, when developed, could easily be connected to the central system. This classification can also include unsewered pockets that cannot economically or physically be connected to the central system. These pockets could also include areas with an insufficient density of wastewater sources to warrant extension of collection lines at this time. For facility planning purposes, these pockets are included in the "sewered" definition if the intent is to connect them to the central system if that ever becomes feasible. On-site treatment management practices continue to be in force in the interim. Properties that cannot yet be connected to the central system are permitted to install on-site systems as needed unless an exception is identified in Table 4-3 or Table 4-4. All sewer extensions to

serve these pockets will be deemed to be consistent with the WQMP as long as they do not require any expansion of the POTW that services them.

An area is classified as “expected to be sewered” if the local management agency perceives that sufficient capacity exists at a POTW, or can be added to it, to handle wastes generated in the area and that a demand exists to extend lines to the area in question. The demand could be the result of growth expectations or the need to address problems being caused by failing on-site treatment systems that exist in the area at the present time. Local officials, depending on their estimate of when projects will actually move forward, can subdivide this category into 5, 10 and 20-year time frames. For purposes of plan consistency, the timing of all projects is at the discretion of local communities. Timing declarations are estimates only and are not binding in any way. Consistency reviews are not affected by departures from these schedules. All central sewerage projects in these areas are subject to a consistency review. Individual properties in these areas can be serviced with on-site systems until sewers become available unless an exception is identified in Table 4-3 or Table 4-4.

Areas classified as “limited sewerage likely within 20 years” differ from the above classification in the confidence associated with the expectation that a demand will develop in the next twenty years. To be placed in this category a DMA has determined that adequate treatment capacity exists at a POTW and that limited collection line extension is affordable. What is different is that there may be no demand to extend lines at this time either because development pressure is low or that individual on-site systems are performing well. From a sewer planning perspective, it is reasonable to expect that sanitary sewers will eventually be extended into at least a portion of areas in this classification, but that extension is not likely to occur or to be completed in the next twenty years. All central sewerage projects in these areas are subject to a consistency review. Individual properties in these areas can be serviced with on-site systems until sewers become available unless an exception is identified in Table 4-3 or Table 4-4.

Criterion 2: Communal systems are inconsistent with the WQMP in areas identified as to remain served by on-site systems or in areas that are waiting for the extension of sanitary service without the expressed permission of the resident municipality in incorporated areas, or the County in unincorporated areas, and must be consistent with local zoning and building requirements of the municipality or township in which they are to be located.

Those areas that are classified in the “areas to remain served by on-site systems” represent several cases. Most are areas that have little demand for growth and are likely to remain rural far into the future. Many represent areas where expected growth can be accommodated with the use of individual on-site systems given existing zoning and building requirements. A few are areas where local officials are actively seeking service with sanitary sewers but have yet to develop viable projects.

“Communal systems” are small systems that use central sewers to collect wastewater from a number of individual properties and to treat it at a central point generally using an alternative treatment technology. New system designs are continuously being researched and the use of communal systems is expected to grow in the future. These systems can allow the use of conservation developments in areas where the use of individual on-lot systems would not support the concentration of building units to preserve open spaces. The use of such systems is restricted to jurisdictions that allow their use. All

proposals must conform to local zoning and building regulations. Each request to use a communal system must be approved the local jurisdiction in which it is to be located.

Criterion 3: On-site waste treatment system designs are approvable consistent with the permitting authorities of local municipal and county health authorities or the Ohio EPA whichever has jurisdiction over the application in question.

Communities, acting in concert with local health authorities and the Ohio EPA, have the option of declaring the types of on-lot systems that are to be used within their jurisdiction. There are two generic groups of systems that need to be considered: discharging and nondischarging systems. Nondischarging systems are on-site systems that have an on-lot discharge (e.g., a leaching system or mound type system). Discharging systems have off-lot discharges of wastewater. The most commonly used system of this type in the NOACA area is the aeration system. The primary difference between the two classes of systems is that discharging systems lead to immediate off-lot problems whenever the system is not operating as designed. For this reason, USEPA and Ohio EPA discourage their use. Communities can opt to require the use of nondischarging systems in all new construction so as to limit the impacts of malfunctioning systems on their residents. The continued use of discharging systems will be subject to permitting requirement of Ohio EPA acting in concert with USEPA.

Criterion 4: Installation or expansion of central sewers or treatment works are inconsistent with the WQMP in areas where sewer plans are undeclared; on-site treatment installations may proceed in such areas.

Areas that are classified as having “sewer plans undeclared” are areas where there is a mix of sanitary sewers and on-site systems and local officials have yet to identify their sewer plans, most usually because they are not yet complete. All land areas in this category need to develop their plans before any consistency action can be taken. The DMA(s) responsible for wastewater management planning in these areas must submit community sewer declarations for undeclared areas prior to the initiation of a consistency review by NOACA and Ohio EPA. The permitting and installation of on-site treatment systems in these areas may proceed pending completion of planning activities and the availability of central sewers.