

## MEMORANDUM

**DATE:** 05/04/09

**TO:** POWTS Program County Code Administrators

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**SUBJECT:** The role of the county in the April 01, 2009 High Strength Wastewater (HSW) policy.

The objective of this document is to describe how a county POWTS program will be involved in the Department's Policy for review of HSW POWTS plans if the county chooses to participate in this process. The HSW policy is in effect as of April 01, 2009.

The principle feature of this new policy is that it recognizes a category of wastewater generating facility termed "at-risk". These facilities are at-risk of generating wastewater having a higher strength and a greater organic load than average residential wastewater. This is effectively a third category between the known high-strength generating facility, such as full-service restaurants, and wastewater from residential type activity. The HSW policy affords owners of at-risk facilities the opportunity to utilize POWTS without pretreatment components.

The objective of the policy is to recognize and consider a greater risk of organic overload to a soil dispersal component with the assurance that it will be discovered at least a year before it can progress to statutory system failure. Monitoring of the soil dispersal component is considered a more reasonable and effective means for early warning than relying upon effluent contaminant concentrations revealed by laboratory analyses to predict potential bio clogging.

Virtually all at-risk facilities are expected to be commercial / public facilities and POWTS plans will be reviewed by the Department as Individual Site Designs (ISD). In addition to verifying code compliance, these ISD plans will be examined with special regard to two important elements. One is a detailed management plan that includes frequent monitoring of the soil dispersal cells for a progressive bio-clogging condition. This requires a contract with a POWTS maintainer. Evidence of this frequent monitoring requirement must be recorded with the deed. The other element is a well-considered contingency plan to address a progressive bio-clogging condition should it be discovered.

The frequent dispersal cell monitoring will be reported to the county through the maintenance reporting program, provided that the county concurs in writing with this oversight role. This written concurrence is a prerequisite to reviewing a POWTS plan for a facility deemed as at-risk of discharging wastewater to the soil dispersal component that may be of higher strength than from typical residential activities. The minimum oversight by the county would be detection of a progressive clogging condition received as part of a maintenance event report and then

notifying the district Wastewater Specialist. If the county agrees to participate in this monitoring program it will be expected that the county will also participate with the Wastewater Specialist and the owner in addressing the condition. The Wastewater Specialist and the county POWTS inspector would contact the owner to develop a plan of action that may involve effluent testing, flow monitoring, changing wastewater generating activities, or implementing the contingency plan.

It is anticipated that this policy will provide greater flexibility in the practical and effective treatment of non-residential wastewater as well as reduce the probability of system failures occasionally attributed to these types of facilities.

A copy of the April 01, 2009 HSW policy is located on the POWTS Program website:  
<http://commerce.wi.gov/SBdocs/SB-PowtsHiStrengPol0109.pdf>

If you have any questions about the HSW policy or a county's role in the plan review and monitoring process, please feel free to contact any POWTS program staff.