

Handout

Agenda Item 5

Date April 11, 2019

Sewer Lateral Ordinance Update

Examples of Failed PSLs (ATYPICAL...!!)



Board Meeting Agenda Item 5

Typical Lateral Defects

Examples of Common Defects Present in PSL's (Typical)



Presentation Topics

1. Status of current ordinance
2. I and I discussion
3. A new proposed approach
4. Triggers
5. Field work
6. LGVSD Evaluation report
7. Lateral repair/replacement criteria
8. Fee/fines
9. Advantages of new approach
10. Expectation Management
11. Board Input
12. Next steps

Status

- Draft Lateral Ordinance essentially complete.
 - Inspection protocol and replacement emphasis
 - Inspections based on pressure test only
 - Replacement during escrow or escrow deposit
 - Focus is on infiltration

Q: Can an LGVSD Lateral Ordinance:

- Target inflow more than infiltration?
- Reduce immediate property owner impact?
- Reduce staff time and owner cost?
- Increase effectiveness?

A: YES, in all cases.

I&I is not a 'single' thing – it's TWO

1. INFILTRATION

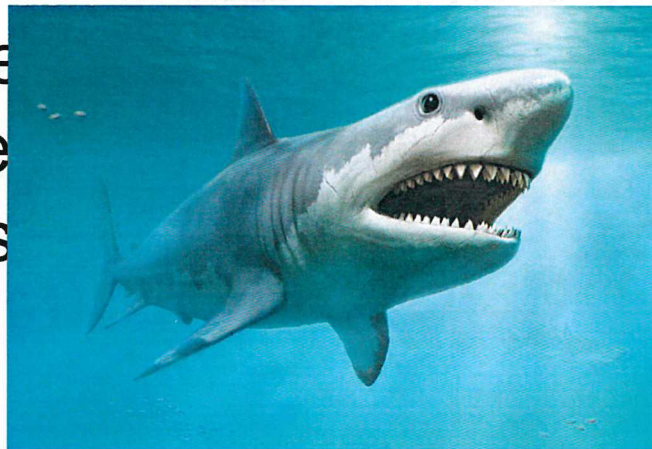
- seepage from
- The worst
- saturated
- Less intense
- 'Chronic'



cracks/joints
available, the
saturated zone

2. INFLOW

- Illegal 'direct'
- Roof gutters
- drainage system
- 'Acute'

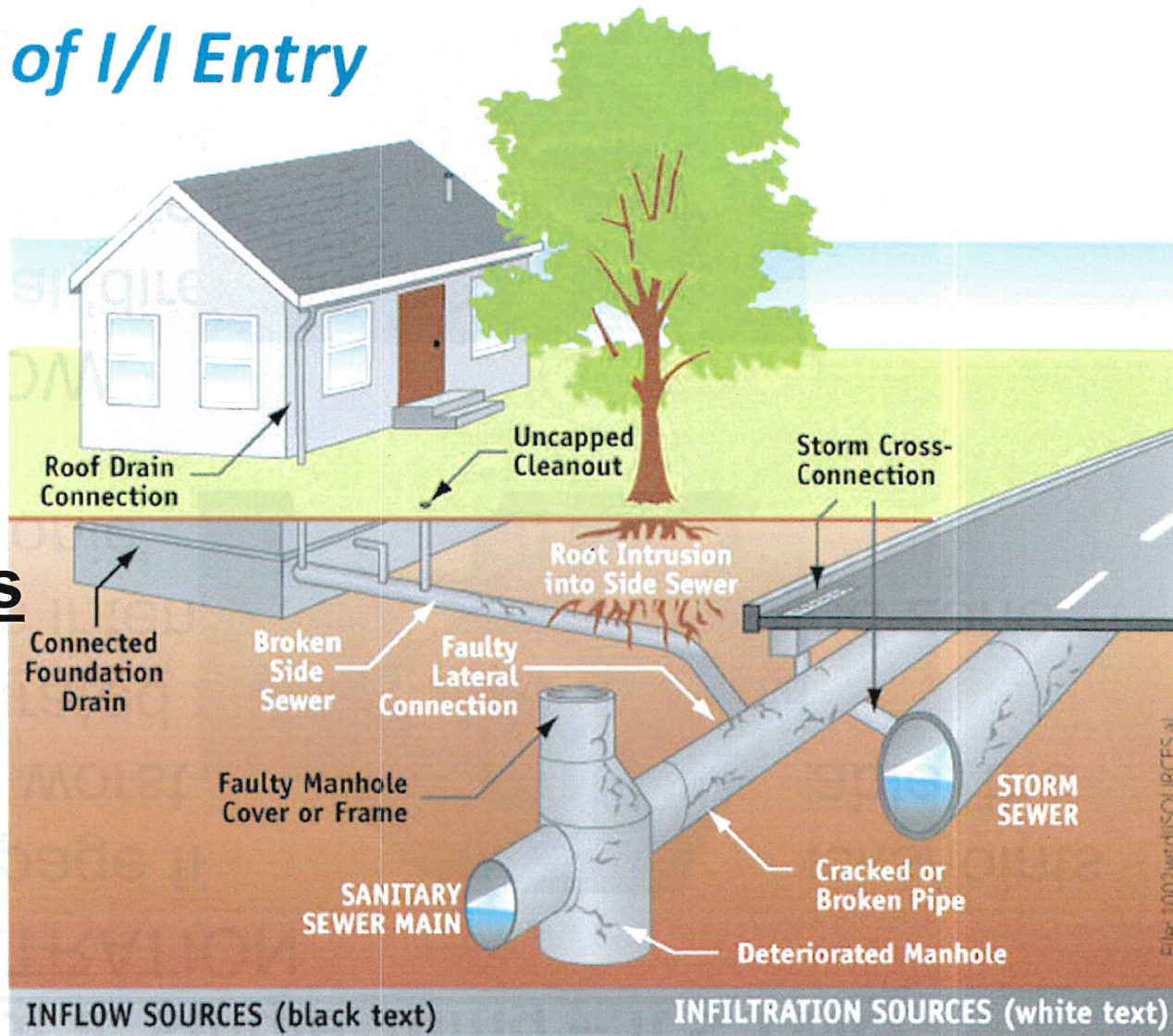


charges, surface

Points of I/I Entry

Area
Drains

Pool
Overflows



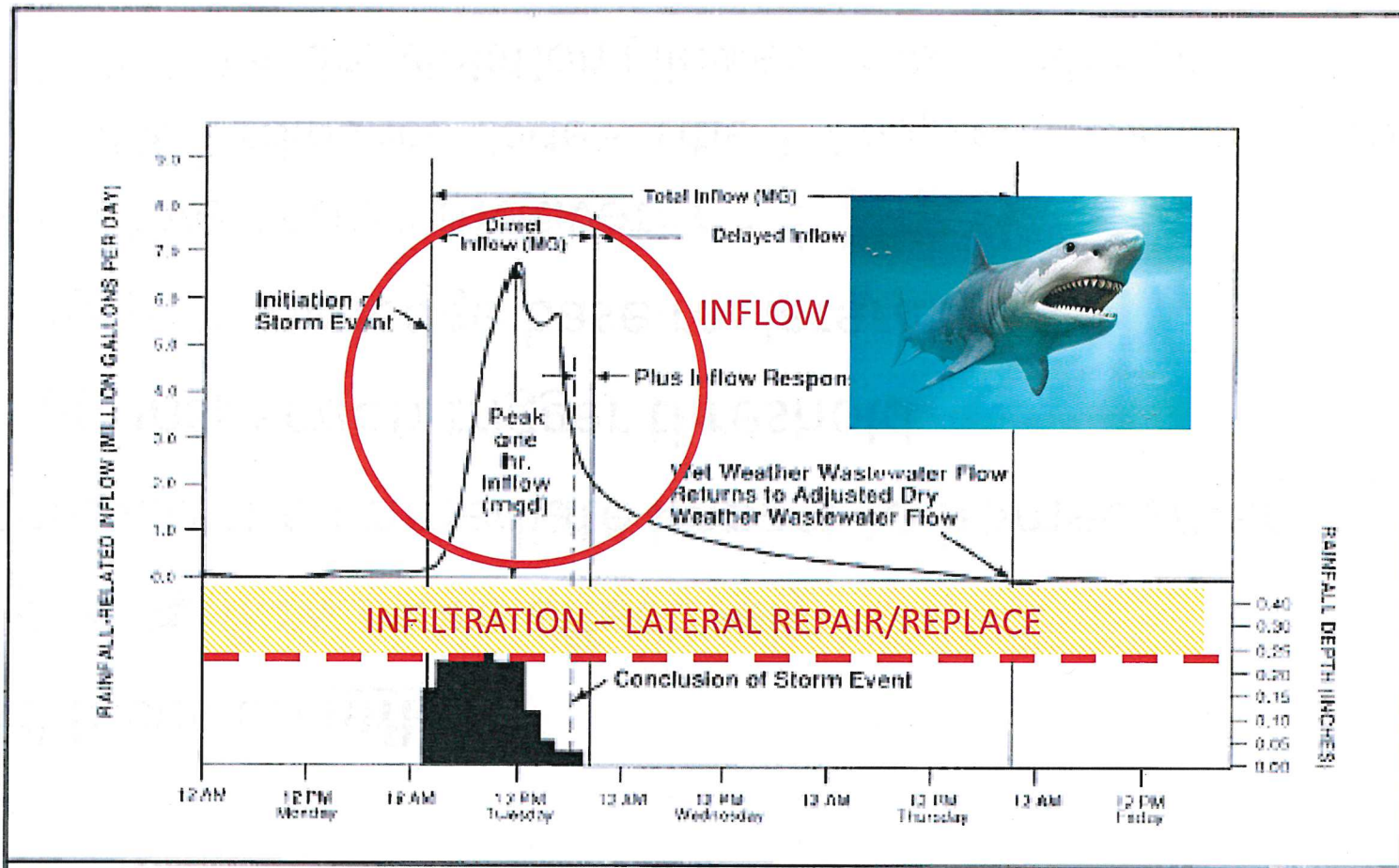


Figure 1: Hydrograph helps visualize inflow as the response to wet weather flow (from MassDEP 1993)

A new proposed approach

- Add focus on inflow
- Decrease flow more effectively
- Decrease the immediate impact to homeowner
- Lower inspection trigger threshold
- Increase knowledge base re: laterals
- Corrective action motivator = \$ (fines)
 - LGVSD Ordinance Code – Title 2, Chapter 1, Section 1007
 - \$1000/day per violation allowed - misdemeanor

Triggers

- Property sale/transfer
- Permits for home remodel = ~~\$75,000~~ ~~\$25,000~~
\$15,000 (construction value)
- Private sewer lateral overflow

Field Work

CERTIFIED PLUMBER

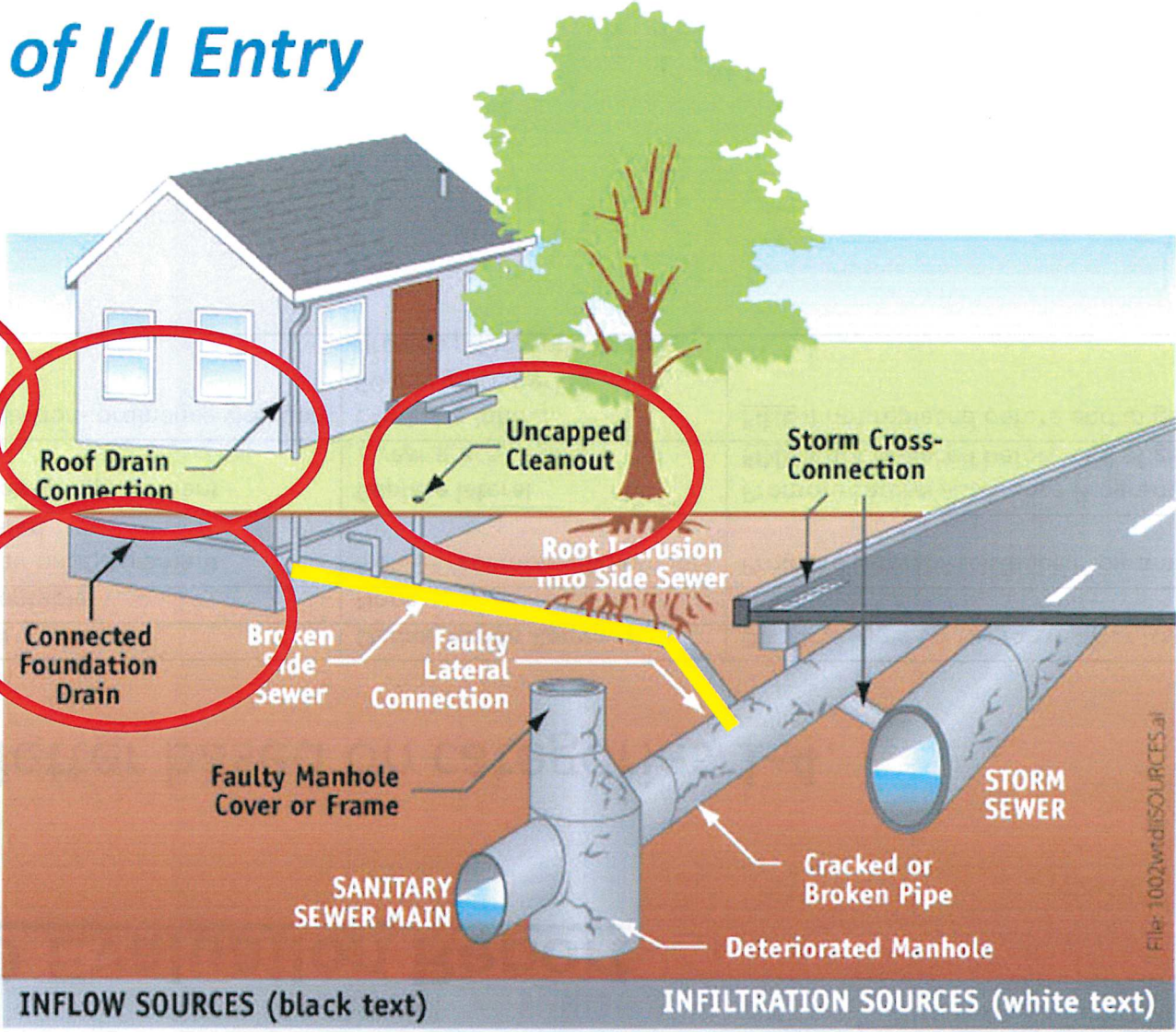
- PACP certified list of “Approved Plumbers”
- Property/Site inflow inspection by PACP Inspector
- CCTV Inspection of lateral
 - CCTV Must meet [Pipe Assessment Certification Program \(PACP\)](#) Inspection Requirements
- PACP Report of Findings
 - Submit to District with a copy of CCTV inspection
 - Must identify ANY illegal connections

LGVSD

- NO LGVSD Field Work other than verification of corrective action.

Points of I/I Entry

Area Drains



LGVSD Evaluation Report

- Form letter based on categories 1-4.

Category	Description	Owner Action Required	District follow up response after issuing Report
1	Lateral acceptable	None	None
2	Lateral repair or replacement recommended	None – recommendation only	Promote Lateral Assistance Program
3	Lateral repair or replacement REQUIRED	Replace lateral 2 year grace period	Promote Lateral Assistance Program, FINE if not replaced before end of grace period.
4	Illegal connection- ordinance violation	Eliminate inflow 90 day grace period provide reinspection report	FINE if not replaced before end of grace period.

Lateral Repair/Replacement Criteria

- Topographical Location
 - Elevation relative to Water table
- Material Type
- Age of Lateral
- Observed Defects – AFFECTING **INFILTRATION**

Note: No Pressure Test Required

- LGVSD Evaluation – Form Letter depending on result (Category 1, 2, 3, or 4)
- Mandated Disclosure for property transfers/sales

Fees/Fines

- Fees

- LGVSD Lateral Review and Recommendation Fee -\$250
- Average Cost for CCTV (PACP) Inspection - \$250

- Fines

Category	Description	Owner Action Required	FINE
3	Lateral repair or replacement REQUIRED	Replace lateral within 2 years	Y1 = \$0 Y2 = \$0 Y3 = \$100 / month Y4 = \$200 / month Y5+ = \$300 / month
4	Illegal connection- ordinance violation	Eliminate inflow within 90 d and provide reinspection report	Up to 90 days - \$0 After 90 days = \$300 / month

Advantages of New Approach

- More laterals inspected
 - Lower permit threshold for required inspection
- Worst laterals targeted
- No 'mandated' impact during escrow
- Targeting inflow as well as infiltration
 - Greater impact/benefit to reducing flows
- More comprehensive evaluation
- Lower staffing requirements
- Lower evaluation cost to property owner
- Still amendable in the future

“Obligatory Expectation Management Slide”

- No ordinance creates 'overnight' improvement
- Concurrent system changes
- Climate change
- Development impacts –relatively minor
- Effects hard to detect – but will happen
- Ordinance works in concert w/rehab projects
- **Ordinance = responsible utility management and stewardship.**

Board Input Requested:

- 'prior' approach or new approach?
- Permit trigger value – \$15,000?
- Inflow violation grace period – 90 days?
- Inflow violation fine amount - \$300/month
- Inflow repeat offense fine/amount? ???
- Lateral replacement grace period – 2 years?
- Lateral replacement failure fine amount - \$100-\$300 per month?
- Pool overflow thoughts? Surcharge?

Next Steps

- Confirm best way to address pool overflow.
- Present to Marin Realtor's Association
- Public Outreach – mailer? Website? Television Ad?
- Finalize language
- Propose Final Draft
- Public Hearing
- QUESTIONS?

