

Lauri Feindell

Subject: FW: Comments requested: Draft Septic Compliance Inspection Report Requirements (X2021.007-DPB)
Attachments: FeedbackForm DDK.pdf

From: Derek Kronebusch
Sent: November 17, 2021 10:32 AM
To: Danielle DeVries <ddevries@rdos.bc.ca>
Subject: RE: Comments requested: Draft Septic Compliance Inspection Report Requirements (X2021.007-DPB)

Hi Danielle,

Im new to the area, but up north I did inspections with my usual ROWP inspectors in tandem. Typical things sent to site is a mini excavator, hydrovac truck with jetter, camera tool and usual hand tools.

Might be more than what most people would want to pay, but it's the only way to get certainty.

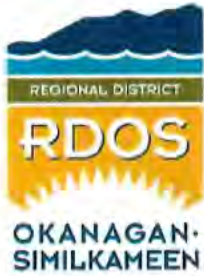
For sludge survey, the cheapest would be a sludge judge and tin can. Otherwise someone like hydrasurvey would do it.

Too many systems out there in states of failure. Only need to take a drive around in the spring to find them.

Regards,

Derek Kronebusch, P.Eng. | Water/Wastewater Project Engineer
McElhanney

n, and destroy all copies.



Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Derek Kronebusch, P.Eng.
(please print)

Street Address: [REDACTED]

Date: Jan 18 2022

RE: **Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2022
Introduction of Septic Compliance Inspection reports**

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
- ☐ I do not support the introduction of Septic Compliance Inspection reports.

Written submissions received from this information meeting will be considered by the Regional District Board prior to 1st reading of Amendment Bylaw No. 2500.24.

3.14,
.1

ADD:

d) Authorized Persons shall be in good standing with their professional association or regulatory body in order to submit any documentation to RDOS. Proof of good standing will be required as part of submission.

e) ROWP's submitting documentation must have Planner (PL) and Private Inspector (PI) endorsement. The work done by ROWP's must fall within their limits of responsibility and if the project complexity increases beyond the ROWP's limits of responsibility, a Professional Engineer shall be engaged.

f) Professional Engineers shall be listed by EGBC as self-declared professionals for the Sewerage System Regulation.

Comment:

Based on discussions with Interior Health, there risks that RDOS may get submissions that may not meet the requirements of the regulation. the listing for engineers under EGBC puts us (engineers) under greater oversight for example (<https://www.egbc.ca/Registrant-Directory/Professionals-for-Sewerage-System-Regulation>).

.2, a), iv)

DELETE:

estimation of the daily design flow required for the intended use using the per capita or per room flow rate, whichever is greater

ADD:

estimation of the daily design flow by the Authorized Person shall be for the intended use in accordance with the Health Act and related design guidelines

Comment:

the current writing focuses on homes, and simple projects. rather than re-create the wheel, the regulations should be referred to, rather than cause potential for conflicts in regulatory requirements. developers love loopholes and areas they can shortcut.

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Lauri Feindell

From: Kelly Hohmann [REDACTED]
Sent: November 10, 2021 1:58 PM
To: Christopher Garrish
Subject: Re: Draft Septic Compliance Inspection Report requirements (X2021.007-DPB)
Attachments: Redacted Letter of compliance.pdf

Hello Christopher:

Thank you for sending this for our review. The section you described, I believe, refers to accepting previous inspections done. We believe inspections should be done when new parameters or renewing permits requires it for the following reasons:

It is our opinion that If someone wants to renew their TUP every 3 years, they should, definitely, have to have another inspection done. I don't have to tell you what homeowners are capable of doing in their homes, and yards, during the course of 3 years or even less. Bedrooms get added, septic systems get altered, landscaping gets added, sheds get built and trees get planted over fields, things get connected to septic systems without permits, field lines get driven over, pumps fail without the homeowner knowing until its too late, etc. This all gets identified when we perform Compliance/Performance inspections . *Every system must also have a record of maintenance performed, especially those installed since 2005.* This can lead to instant non-Compliance, especially in Type 2 and 3 systems. This maintenance must be performed by an ROWP Maintenance Provider and the homeowner should be able to provide proof of such. **NB. Almost all pump truck operators are NOT ROWP MP's.** This is also a point of confusion on the clients side as they automatically assume that the guy who comes to service the tank is an ROWP. Please also note that any residence that has no record of sewerage on file, also instantly means that they've failed Compliance, and *no one* is allowed to alter a non compliant system in an attempt to bring it into compliance. Again, If no inspection is done, this cannot be determined. Remember that when the paperwork in a Compliance Inspections meets the standards set out, we are then *required* to conduct an onsite inspection. A septic system cannot be determined to be Compliant without an onsite review of the actual integrity of the systems components as it is installed, performance of the system and comparison of the systems components to the original sewerage permit application. All of this is then evaluated to the proposed usage applied for. Again, this can only be determined when the inspection is done. Performance wanes with the age and use of a septic system. We also have to consider the age of systems when we are doing Compliance Inspections. Systems may only be altered within a very specific timeline, with a permit, and usually not after that timeline, without bringing everything up to the current code .Generally, 10 years. We like to think of Onsite Sewerage Systems like living environments. Septic systems are constantly changing with age and use. An older system that is working perfectly fine in the spring may show signs of failure by summer's end. Upon investigation, it is determined that the homeowners had a daughter and her 2 children move in over the summer, taxing the already delicate system, leading to failure. With systems usage, age and needs in constant flux, it is recommended that inspections are done more frequently rather than less frequently. In other words, it is prudent to err on the side of caution.

After having said all that, In light of all the "inspection" reports we are coming across, we believe that in the foreseeable future, all previous permits issued with "Inspections" (done by unauthorized persons not following guidelines) should be reviewed with new ones done by Authorized Persons, at least until we all get on the same page. As mentioned in my phone call, there was a client who recently contacted us for an inspection on a TUP renewal. Upon further investigation, it was noted that the original Compliance Inspection was performed by an ROWP PL/IN. Not only did this person perform an inspection when not authorized to, but she based her inspection on a septic permit with the wrong address on it. It was actually a permit for the adjacent property and not the property in question. She then went on to authorize usage for 10 people in a 3 bedroom home. A sewerage file search determined that there was no sewerage application for the property in question, so the

Compliance Inspection was an instant Fail. This homeowner has since removed his TUP application and has been advised to engage the services of an ROWP Planner/Installer to replace his septic system with one that meets the code. If the homeowner applies for another TUP, it would be advisable for the RDOS to request another inspection report. Just because it's new, doesn't mean it will meet Compliance.

We think, also, that *any* inspection report done by an authorized person, with regards to a municipality requirement, should be forwarded to that municipality for their records. This could prevent a client from "shopping around for a quick "Pass" Compliance report when none was issued the first time. We discussed earlier a "standardized" form which the RDOS could quickly refer to for your purposes, however, that usually comes at the end of a properly recorded, detailed, report. We believe the RDOS should have both. This practice will also force accountability for the authorized person doing the inspection. When we perform a Compliance Inspection, we submit a detailed report to the homeowner, along with supporting documentation and a document (Letter Of compliance) stating the contact information, address of the inspection, proposed usage of the home, date of the inspection, compliant pass or fail and under the comments, we provide, in point form, the major reasons why the system failed compliance or the conditions with which is passed compliance. eg. The homeowner wanted to have a TUP for 12 people in a 3 bedroom home, but they are only authorized to have 4 people. This document is stamped and signed by Kelly. *Please see attached*. Perhaps, we could use the same template, re-arranged to suit the RDOS's needs and submit it for your use, all while having the detailed report in your file for reference. When a report is issued, the liability falls on the inspector to justify his/her conclusions in as much detail as possible [REDACTED]

[REDACTED] These new inspections, done according to your new guidelines, once implemented, will begin to identify those in the industry who are not adhering to the codes put in place for everyone's safety. This, in turn, will give the RDOS a "heads up" when dealing with your own requirements.

Please let us know, Kelly or myself, if you need anything else to get this all up and running.

Take care,
Sylvia

On Tue, Nov 9, 2021 at 5:06 PM Christopher Garrish <cgarrish@rdos.bc.ca> wrote:

Hi Kelly & Sylvia,

My apologies for the delayed response in providing these draft Septic Compliance Inspection (SCI) Report requirements to your for feedback.

We would be happy to receive any comments or suggestions that you may have. I know in our meeting that you had mentioned that SCIs should be required every time someone applies for a TUP or a renewal. Keeping in mind that the attached amendment bylaw is Draft, I would be interested in your thoughts on the proposed sub-section 1.9(b) shown near the bottom of page 2.

I see Sylvia has left me a message regarding a property in Naramata [REDACTED] There is no longer an active vacation rental TUP associated with this property, but I will have one of our Planners touch base with you tomorrow.

Sincerely,

Chris.



Kelly Hohmann ROWP (PL)(IN)(MP)(PIR)

Letter of Compliance

Contact Information:

Name:

Address:

Phone:

Address of Inspection:

Proposed Usage of Home:

Date of Inspection:

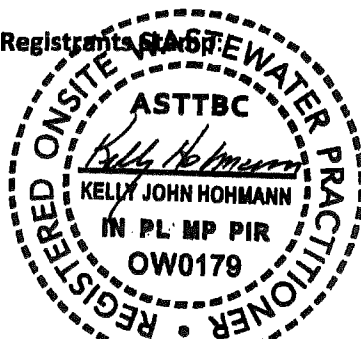
Compliant: (circle)

Pass

Fail

Comments: System failed compliance for the following reasons: 1. The designer did not calculate the daily flows accurately for a 3 bedroom home and cabana. 2. The systems design of the CTDS seepage bed exceeds maximum 3 m (10ft) width and linking distribution boxes and the LLR system contour length has been reduced to fit the dispersal area, all which deviates from the SPM without any supporting documentation. 3. No Point of Application sampling ports and 4. The home today is a 4 bedroom house adding additional effluent to the daily design flows.

Registrants Stamp



Registrants Signature:

Kelly Hohmann

*This Compliance Inspection was carried out by Kelly Hohmann ROWP (PIR) under the Authority of ASTTBC's Onsite Wastewater Certification Board, January 26 2017, Section 3.4.(1)(2)(3) Private Inspector and Registered Onsite Wastewater Practitioner (ROWP) Practice Guidelines, January 26 2017, Section 7.0 Private Inspector (Pi) and 7.1 Regulatory Framework for Private Inspectors and 7.3 Compliance Inspection.



Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Andrew Dyczkowski ROWP PL, IN OW0870

(please print)

Street Address:

2021-11-17

Date:

RE: Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2021
Introduction of Septic Compliance Inspection reports

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☐ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
- ☒ I do not support the introduction of Septic Compliance Inspection reports.

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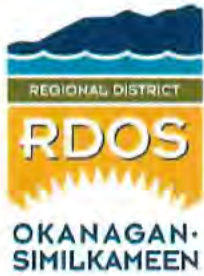
Hello,

Your draft is missing the following:

ROWP planner (PL) can review documentation available from Interior Health, conduct site/soil assessment and prepare the design of needed changes or of a new septic system. ROWP installer than can do on-site work. The above avenue reduces the workload of ROWP inspectors and would also provide desired outcome without the need of extensive paperwork (In most cases the "compliance report" will lead to the recommendation of the above described steps anyway, so why not add the option to bypass the report and proceed with planning/install ?)

Feedback Forms must be completed and returned to the Regional District prior to noon on the day of the applicable Regional District Board meeting.

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Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Derek Kronebusch, P.Eng.
(please print)

Street Address: [REDACTED]

Date: November 17 2021

RE: Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2021
Introduction of Septic Compliance Inspection reports

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
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3.14.2.b.

~~DELETE: an overview of the function and condition of the existing onsite septic system including the last treatment system monitoring results for type 2 or 3 systems.~~

~~ADD: destructive and non-destructive testing of the system to confirm function and condition of the existing onsite septic system including the last treatment system monitoring results for type 2 or 3 systems. beyond non-destructive visual inspection of the assets, additional measures for inspection include: lagoons, a sludge survey to confirm remaining storage volume and if additional cells are required. For other systems, CCTV inspection of all underground piping after jetter cleaning. septic tanks shall be drained, washed and inspected for cracks, spalling, or other concrete degradation. As part of inspection, Inflows and Infiltration should be verified with all assets with confirmation of no cross-connections (may require smoke testing) from sources like perimeter drains, roof leaders, or non-authorized water sources.~~

3.14.2.d.

~~DELETE: d) a site map drawn to an identifiable scale that include the following information:~~

~~ADD: d) a site map drawn to an identifiable scale, if site conditions are different than the record design drawings, that include the following information:~~

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Lauri Feindell

From: Quality Control Management QCM [REDACTED]
Sent: November 17, 2021 11:55 AM
To: Danielle DeVries
Subject: Re: Comments requested: Draft Septic Compliance Inspection Report Requirements (X2021.007-DPB)

Good morning, Danielle

With all due respect, I would very much like to have a discussion with you and the RDOS regarding this proposed bylaw, as I have many comments and concerns that will not fit on this page and would require more explanation that may help you greatly.

I have an extensive background in this industry for the last 32 years. I am myself an ROWP PI In and one of the editors of both the SPM V2 & SPM V3. I taught onsite wastewater design, install and soils for approx. 6 years, as well as being a part of the technical review committee that wrote the manuals for teaching, I also was part of a team of three that worked for the Ministry of Health in Victoria auditing over 800 practitioners (both ROWP's & Engineers) within the province. I have sat on the registration board with ASTTBC, was Vice President of BCOSSA, and sat on the SSLC (sewerage system leadership council) for the province of BC.

I believe there is some confusion as to what is needed for a "change of use" situation regarding the Sewerage System Regulations (SSR) and the Standards Practise Manual (SPM V3)

There are items that you have listed that would be impossible to do on an existing septic system, without doing damage to an existing septic or sewerage system. Not to mention the unnecessary costs this would cause. If this bylaw requires the items as listed, I can see huge liability issues with disturbance to existing systems that are unnecessary.

The basics are as follows:

A vacation rental has the same strength of effluent as does a single-family home this is referred to in the SPM V3 as residential strength effluent. What needs to be determined is what each homes capacity, which is known as the daily design flow rate (DDF) was at the time the septic system was designed and installed.

For example, today a 3-bedroom single family home up to 280 sq. m would have a Daily Design Flow (DDF) of 1300 litres/day, but a vacation rental with a maximum occupancy of 6 persons would be calculated as 6 persons @ 400-450 litres/day/person which would equal 2400 -2700 litres/day . Therefore this system has a maximum capacity (DDF) of 1300 litres/day, working backwards this same system could be used as a vacation rental (part time) for up to a maximum of 3.25 persons (1300 litres/day divided by 400 litres/day/person) This is done with a desk top review of the documentation of an exing septic system.

Only two simple things need to be determined in a change of use such as going from a single-family home to a vacation rental . The first is that the system functioning as intended. the second is what is the DDF of the system, (this is its maximum capacity.)

Also please note that Planners are also allowed to review and determine change of use of existing systems through the SSR, SPM & ASTTBC.

If you are interested, I can be reach on my cell [REDACTED]

Kind regards

Karen S. Halliday ROWP PI In
Quality Control Management

From: Danielle DeVries <ddevries@rdos.bc.ca>

Sent: November 16, 2021 6:05 PM

To: Planning <planning@rdos.bc.ca>

Subject: Comments requested: Draft Septic Compliance Inspection Report Requirements (X2021.007-DPB)

Hello Septic Professionals,

We are working on updating the septic compliance inspection requirements for vacation rentals in the RDOS.

Since this affects your work, we would like to hear your comments on the proposed requirements for Planning applications.

The intent is to make sure that our requirements are consistent with the ASTTBC, and, on the Planning side, to understand that the septic systems are safe and healthy for vacation rental use, in good working order, and can support the proposed number of patrons.

Please send your comments on the draft bylaw back via the feedback form attached to myself and planning@rdos.bc.ca by **Thursday, December 2, 2021**. Let me know if you need more time.

You can find more on the project here: [Septic Compliance Inspection Reports | RDOS](#)

Thank you,
Danielle



Danielle DeVries • Planner I

Regional District of Okanagan-Similkameen

101 Martin Street, Penticton, BC, V2A 5J9

p. 250.490.4213 • tf. 1.877.610.3737 • f. 250.492.0063

www.rdos.bc.ca • ddevries@rdos.bc.ca

[FACEBOOK](#) • [YOUTUBE](#) • Sign up for [REGIONAL CONNECTIONS](#)

I acknowledge that I work within the traditional, unceded territory of the syilx people in the Okanagan Nation.

This Communication is intended for the use of the recipient to which it is addressed, and may contain confidential, personal and/ or privileged information. Please contact the sender immediately if you are not the intended recipient of this communication and do not copy, distribute or take action relying on it. Any communication received in error, or subsequent reply, should be deleted or destroyed.



Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen FILE NO.: X2021.007-DPB

FROM: Name: JOHN SMELTZER. ROWP.
(please print)

Street Address: [REDACTED]

Date: NOV 25/21

RE: Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2021
Introduction of Septic Compliance Inspection reports

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
- ☐ I do not support the introduction of Septic Compliance Inspection reports.

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- THERE IS UNNECESSARY DUPLICATION WITH WHAT'S ALREADY ON FILE WITH INTERIOR HEALTH-PARTICULARLY ITEMS 2A, 2B, 2D.
- SPECIAL ATTENTION SHOULD BE GIVEN BY INSPECTING PRACTITIONERS TO VACATION RENTALS, VRBO'S ETC. ALTHOUGH NO ADDITIONAL BEDROOMS ARE BEING ADDED (FOR EXAMPLE) THE NUMBER OF PEOPLE STAYING AT ONE TIME CAN BE EXCESSIVE AND THEREFORE RISK OVERLOADING THE SYSTEM.
- SOME ITEMS BEING ASKED FOR DON'T EXIST AND MY CONCERN IS A CLERK RECEIVING THIS INFO IS NOT KNOWLEDGEABLE YET WILL STILL,

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CONT: DEMAND IT BECAUSE HE OR SHE WILL HAVE A
"BOX TO CHECK"



Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Lesley Desjardins, Executive Director, WCOWMA-BC Onsite Wastewater Management Association (please print)

Street Address: [REDACTED]

Date: December 2, 2021

RE: **Regional District of Okanagan-Similkameen Development Procedures Amendment Bylaw No. 2500.24, 2021**
Introduction of Septic Compliance Inspection reports

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
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~~The requirements for a Septic Compliance Inspection report to be completed by a Private Inspector Commercial, or Residential) fails to acknowledge that this work could be and perhaps should be completed by a Planner. A planner assesses the site, the soils, and the flows from the residence to determine system siting and sizing. A residence that has changes to its footprint, such as additional bedrooms, bathrooms, square footage, etc. must be reassessed and may require changes to the septic system. This is the initial responsibility of a ROWP Planner, not a Private Inspector.~~

~~By assigning these tasks solely to a Private Inspector, the Inspector is being asked to partially work outside the scope allowable to them through ASTTBC. It is recommended that the draft bylaw be amended to assign this work to a ROWP Planner, or to either a Planner or a Private Inspector.~~

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Interior Health

December 3, 2021
Danielle DeVries, Planner
Regional District of Okanagan-Similkameen
101 Martin Street
Penticton, BC, V2A-5J9

Sent via email: planning@rdos.bc.ca

RE: Draft Septic Compliance Inspection Report Requirements (X2021.007-DPB)

Danielle DeVries:

Thank you for the opportunity to provide comments on this application. It is our understanding that the Regional District of Okanagan Similkameen (RDOS) is proposing to amend Bylaw No. 2500, 2011 to include a Septic Compliance Inspection as part of the application process for Temporary Use Permits (TUPs), in particular for uses such as vacation rentals when the subject property is not connected to a community sewer system. This referral has been reviewed from a Healthy Community Development perspective.

We support this proposed bylaw amendment because it will result in the RDOS having a better understanding of the long-term sustainability and self-sufficiency of each subject parcel in terms of onsite servicing and the proposed new use. In this way, more informed decisions would be made. For similar reasons, we suggest a Septic Compliance Inspection report also be required for new ancillary dwellings and/or secondary suites.

It is important for long-term, self-sufficiency in terms of onsite servicing of a parcel to have at least one area appropriate for sewage dispersal available for future needs when the existing system malfunctions. All sewerage systems have a limited lifespan. Ensuring a back-up area of land is available is prudent. The [BC Sewerage System Regulation](#) and accompanying [BC Sewerage Systems Standard Practices Manual](#), which is the best practice document and required reference of Authorized Persons, does not require future needs to be considered in designs of proposed uses.

This is the reason that we support this proposed amendment and suggest the following to further strengthen it and for ease of use:

1. Use the term 'Authorized Persons' instead of 3.14. .1(a) and (b) to align with wording contained within the [BC Sewerage System Regulation](#).
2. Require that the Septic Compliance Inspection contain the same information as Compliance Reports in the [BC Sewerage Systems Standard Practices Manual](#). The two lists are similar.
3. Adding the following as being required in the Septic Compliance Inspection:

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations, where we live, learn, collaborate, and work together. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.



- a. An explicit statement from an Authorized Persons stating whether they believe the existing onsite sewage system and the conditions of the land can support the proposed change in usage such that a health hazard is not likely to occur; if not, then also include what would be required to allow for the proposed use.
 - b. Identifying an area of land appropriate for a sewerage dispersal area of appropriate size in the event the existing system malfunctions.
4. Removing the word 'negatively' within 2.(i) section 3.14, .2c; to read as '... change that may impact the existing onsite...'. The demonstration of any impacts, irrespective of positive or negative, is suggested.
5. Addition of examples within 2.(i) section 3.14, .2c:
 - a. .1 to include 'short term use'
 - b. .2 to include 'parking area'

Lastly, we suggest an explanation of how the RDOS will use this information when considering TUP applications be included or otherwise available to applicants.

Interior Health is committed to improving the health and wellness of all by working collaboratively with local governments and community partners to create policies and environments that support good health.

Sincerely,

	
Tanya Osborne, BAHS Healthy Communities	Anita Ely, BSc, BTech, CPHI(C) Specialist Environmental Health Officer Healthy Communities Program

TO&AE/ae

We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations, where we live, learn, collaborate, and work together. This region is also home to 15 Chartered Métis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Métis, and Inuit peoples across the Interior.

Lauri Feindell

From: Ely, Anita <Anita.Ely@interiorhealth.ca>
Sent: December 17, 2021 4:16 PM
To: Danielle DeVries
Cc: Osborne, Tanya
Subject: RE: Sewerage Questions

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Danielle,

It was good to meet you the other day. This is the link to the BC Sewerage System Standard Practices Manual: <https://www2.gov.bc.ca/gov/content/environment/waste-management/sewage/onsite-sewage-systems/sewage-system-standard-practice-manual> . Section 7 is the Maintenance Guidelines. In this section it describes what should be done to complete and inspection and what information should be provided in a report.

I spoke with Marion Masson, our Specialist Environmental Health Officer for Soils and Land Use team. She agreed that it would make sense to use the terminology 'Authorized Person' and then let the ROWPs and PEngs determine if they are in their swim lane for the work they are being hired to do. If RDOS ever had any question about whether a person was appropriate then ASTTBC or APEG could be asked.

I hope this helps. If you have any more questions feel free to contact me.

Best regards,

Anita

Anita Ely, BSc, BTech, CPHI(C)
Specialist Environmental Health Officer
(she/her/hers)

Healthy Communities, Population Health
851 - 16th St NE, Box 627, Salmon Arm, BC V1E 4N7
c: 250 - 253 - 3679
Anita.ely@interiorhealth.ca



We recognize and acknowledge that we are collectively gathered on the traditional, ancestral, and unceded territories of the seven Interior Region First Nations, where we live, learn, collaborate and work together. This region is also home to fifteen Chartered Metis Communities. It is with humility that we continue to strengthen our relationships with First Nation, Metis, and Inuit peoples across the Interior.

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Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: C. Jeffrey Oland, P.Eng.
(please print)
Street Address: [REDACTED]
Date: Jan.12, 2022

RE: **Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2022
Introduction of Septic Compliance Inspection reports**

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
- ☐ I do not support the introduction of Septic Compliance Inspection reports.

Written submissions received from this information meeting will be considered by the Regional District Board prior to 1st reading of Amendment Bylaw No. 2500.24.

I recommend removing the word "high-level" 3.14.2-d)ii

I do not know of the definition or term "high-level design" in the sewerage system standards. Simply say "a suggested design for a replacement".

I am not sure how 3.14.2-d)iii would be managed. Would RDOC require a regular report on the water use and then enforce the replacement of the sewerage system that may be functioning perfectly but simply showing more flow than was predicted.

These things are more enforceable at the building permit or new use permit stage than it would be after the new use permit is issued. The report should pass or fail the system based on a fair and accurate evaluation. This may include stress testing or monitoring the existing system before the report is complete.

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Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Kelly Hohmann ROWP ABC Septic Services Ltd,

Street Address: [REDACTED] Naramata, BC Date: Jan 14 2022

**RE: Regional District of Okanagan-Similkameen Development Procedures Amendment Bylaw
No. 2500.24, 2022**

Introduction of Septic Compliance Inspection reports

My comments / concerns are:

I do support the introduction of Septic Compliance Inspection reports.

X I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.

I do not support the introduction of Septic Compliance Inspection reports.

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You have asked us to get involved with assisting you in amending bylaw 2500, 2011. Your current proposal has missed the intent of the BCSSSPM (British Columbia Sewerage Standard Practices Manual) and the ASTTBC's guidelines for an ROWP with the registration of Private Inspector (PIR, PIC). These guidelines are specific in their duties for an ROWP Private Inspector. An inspector can provide a Performance Inspection or a Compliance Inspection. Your TUP requires that a Compliance Inspection should be performed in the approval of a TUP application. Your bylaw does not follow these guidelines. They have more closely followed the existing status quo that has caused such confusion. Sylvia provided numerous planning staff with the standard practice guidelines for private inspectors. These guidelines will be provided again in this email. I caution you to move forward with this current document as this draft is the complete opposite of what you were trying to avoid and accomplish.

Under 2. (i) 3.14 1. B you have identified septic system assessments to be conducted by a Registered Onsite Wastewater Practitioner (ROWP) registered with the Applied Science Technologists & Technicians of British Columbia (ASTTBC). This is where the draft needs to include "**with the registration of PIR (PI) (Private Inspector Residential)**". Only ROWP's with this registration can conduct Inspections, or Assessments for:

- i. Property owner wishing to increase the number of bedrooms or living area, or adding a suite for a separate residence area, or,
- ii for a commercial institutional facility wishing to change wastewater quality or quantity, or,

iii A property zoning change is being requested, or,

iv Any reason that requires the evaluation and comparison of an existing system to a variation under which the original system authorization to use or final filing documents were issued.

NB. Any Authorized Professional (Engineer) must be qualified and experienced in onsite wastewater treatment systems as per the guidelines set out by Engineers & Geoscientists British Columbia Professional Practice Guidelines. ie. not just any engineer can inspect onsite wastewater systems.

1.4. Where an ROWP (PIR) is required to write a Letter of Assurance, Compliance, or other such letter as required by a property owner, building/engineering/planning department, or other authority or agency, the ROWP must carry out an inspection of sufficient thoroughness and in a form best suited for the specific requirement in order to produce the letter. This should include the reasoning, calculations, as-built plans, and/or any other details that substantiates and explains how the decision or conclusion was reached.

In the ASTTBC Guidelines 7.0 Private Inspector (PI) and 7.1 Regulatory Framework for Private Inspectors, it states ***“Any ROWP that provides services as an Inspector, or provides any assessment or confirmation of the performance or functionality of an existing sewage system other than for the purposes of maintenance, shall be certified and registered with the PI endorsement.”***

In section d, your language is inconsistent with any standard in this industry. Your use of “High level design” for a replacement system that would be suitable for the intended use ?????? or,

I would suggest that you retain an ROWP PIR or Authorized professional (engineer) qualified to work with onsite wastewater, to guide you with this draft before it is accepted. This draft needs to identify itself correctly. It then needs to move forward methodically with outlined guidelines already in practice. ie. You cannot re-define an ROWP's responsibilities. We have laid out for you what is required by an ROWP with a PI endorsement. We have included ASTTBCS guidelines for those inspections and what they include. Your current draft falls short on many of the guidelines that may contribute or create a health or safety hazard.

Please do not hesitate to contact me with any concerns or questions.

Respectfully,



Kelly Hohmann
ROWP (PL)(IN)(MP)(PIR)

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reviewed and amended after a specified period of system operation. At that time, the maintenance provider may establish a revised maintenance frequency and file an amendment to the maintenance plan (with or without the input of the planner) if he or she has the suitable level of competency to do so.

6.1 Compliance with Standard Practice Manual (SPM)

The ASTTBC requires Maintenance Providers to follow the SPM standards and guidelines for maintenance practices. Maintenance Providers must provide the owner or client with a written report of maintenance performed or required after each maintenance visit is completed.

7.0 Private Inspector (PI)

7.1 Regulatory Framework for Private Inspectors

The SSR and the SPM do not stipulate that individuals providing onsite wastewater inspection services are to be certified or registered as Authorized Persons (AP). ASTTBC considers conducting accurate inspections and providing quality reports and other information on the condition of onsite wastewater systems of paramount importance. Any ROWP that provides services as an Inspector, or provides any assessment or confirmation of the performance or functionality of an existing sewage system other than for the purposes of maintenance, shall be certified and registered with the PI endorsement.

The ROWP is to offer an inspection tailored to the needs of the client while meeting the minimum inspection standards for either inspection type. The ROWP must ensure that an appropriate level of inspection and reporting is conducted to determine and explain both the findings as well as provide adequate information to defend and document conclusions. Any ROWP PI who undertakes an inspection must have the educational qualifications, equipment, competencies and experience to do thorough inspections.

There are two types of inspection: 1) Performance inspections; and 2) Compliance inspections.

7.2 Performance Inspection

A Performance Inspection is intended to assist a prospective buyer with determining the condition of the onsite sewage system, suitability for the buyer's intended use or changes to the home or property, recommended or required maintenance, repairs or improvements with reasons for them, time frame for undertaking repairs and maintenance, information on who can undertake the work and how they can be contacted or located. This inspection can also be carried out on behalf of a property owner prior or during the listing of their property for sale as an aid for prospective buyers. May also be appropriate where a property owner wishes to understand the system and its performance for their own knowledge.

A Performance Inspection is to determine or include the following:

- a) System types 1, 2 or 3
- b) Explain the expected function as well as the actual function and condition of each component
- c) General location of each component on the property
- d) Location of any utilities in the vicinity of the onsite system
- e) Review of all existing permit/Filing documents and comparison with the system as installed
- f) Review of all existing maintenance records

- g) Review written where possible current or expected usage information collected from the occupant/client against the designed abilities of the onsite system
- h) Completion of a detailed report to the client on the condition, performance, and suitability for intended use and recommended or required repairs, maintenance or improvements to the system

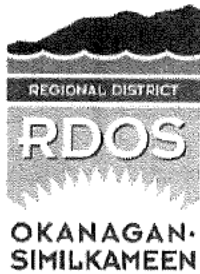
7.3 Compliance Inspection

A Compliance Inspection is intended to assist a property owner when making changes to the home or property subject to bylaw requirements for the change in use or additional structures being permitted. A Compliance Inspection includes all aspects of a Performance Inspection plus the following requirements:

- a) Detailed and precise recording of location and sizing of system components
- b) Comparison of the system as installed against the intended change within the building (additional bedrooms, floor space, occupants, etc.) or to the property (proposed swimming pool, workshop, landscaping or other structures or work) that may negatively impact the existing onsite sewage system
- c) Effort is to be made to collect and review all relevant supplementary documentation which may include the electrical permit, site survey/plans plans, and restrictive covenant, right-of-way, or other limiting condition information
- d) Submission of any reporting or approval form as required by a regional district or municipal bylaw prior to the issuance of a building permit or similar document
- e) A ROWP is to ensure that no report, statement or assurance of compliance letter is issued which cannot be substantiated by the information gathered during the inspection.
- f) A ROWP must expect that any report, statement, or assurance of compliance letter may be read by a third-party and that such a document may be relied upon to make material decisions unless the document specifies otherwise.
- g) A ROWP is not to certify, or otherwise make legal, a system that was not planned and installed under a valid permit or Filing.

7.4 Procedural Guidelines for Private Inspectors

ASTTBC has developed a procedural guide for ROWP Private Inspectors (see 8.0 Annex 1) as a supplement to the SSR and the SPM.



Feedback Form

Regional District of Okanagan Similkameen

101 Martin Street, Penticton, BC, V2A-5J9

Tel: 250-492-0237 / Email: planning@rdos.bc.ca

TO: Regional District of Okanagan Similkameen **FILE NO.:** X2021.007-DPB

FROM: Name: Gary Dicken ROWP
(please print)

Street Address: [REDACTED], NARAMATA, BC

Date: 1 December, 2021

RE: Regional District of Okanagan-Similkameen Development Procedures Amendment
Bylaw No. 2500.24, 2021
Introduction of Septic Compliance Inspection reports

My comments / concerns are:

- ☐ I do support the introduction of Septic Compliance Inspection reports.
- ☒ I do support the introduction of Septic Compliance Inspection reports, subject to the comments listed below.
- ☐ I do not support the introduction of Septic Compliance Inspection reports.

Written submissions received from this information meeting will be considered by the Regional District Board prior to 1st reading of Amendment Bylaw No. 2500.24.

PLEASE SEE ATTACHED LETTER

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NARAMATA EXCAVATING & CONTRACTING Ltd.

Gary W. Dicken, ROWP



2 December, 2021

Re; Feedback on proposed bylaw No 2500.24 2021, Draft Version 2021-11-09

File No; X2021.007-DPB

Septic Inspections

I am in favor of requiring evaluations of septic systems in vacation rentals to determine if they meet standards.

The bylaw should focus on the requirements of the Sewerage System Standards practice Manual, Version 3, published by the Health Protection Branch, Ministry Of Health.

This is "the bible" which all ROWP's must follow and engineer's can only deviate from with an explanation. It explains the steps which must be taken to assess existing systems for a new use. I have attached some of the pages which explain what is required to check that systems comply with the standards.

Your draft seems to focus on the role of ROWP private inspectors and the wording and forms that they fill out in their roles, most frequently in real estate transactions.

A ROWP **Planner** is an authorized person who can evaluate existing systems and whether their use is a new use of an existing system, and if it is a new use then they can calculate design flow rates, check vertical separation, establish whether it meets standards etc. as required by the Standards manual.

Also **only** a ROWP **planner** or **engineer** with experience in wastewater can design a new system. Installers are not qualified to assess systems.

I suggest you also check with the Ministry of Health, ASTTBC, APEG, and WCOWMA as to the wording before you put a new bylaw in place.

If you would like to discuss any of this with me then please feel free to contact me.



Gary Dicken, ROWP



II- 2.1.2.2 System repair and horizontal separation to drinking water well

The Ministry of Health *Sewerage System Policy for Setback from Wells Based on Repairs or Alterations* allows for repair or installation of replacement system components, for example tanks, where setbacks to the nearest well does not comply with the Sewerage System Regulation (SSR). This allowance is limited to systems where:

- Daily Design Flow is not changed (so no expansion of use), and
- The existing system was installed in accordance with legislation prior to June 25th 2010.

The policy exempts these systems from the requirements of section 3.1 of the SSR, including installing extra septic or treatment tanks.

<http://www.health.gov.bc.ca/protect/pdf/sewerage-system-repair-policy.pdf>

II- 2.1.3 UPGRADING OR REPLACEMENT OF AN EXISTING SYSTEM

When upgrading a system for a new use or for a higher Daily Design Flow or when replacing the system, plan the system to comply with the standards in this volume.

II- 2.1.4 NEW USE OF EXISTING SYSTEM

When assessing an existing sewerage system for a new use:

- ☐ Assess and document all components of the system.
- ☐ Measure or estimate the vertical separation in the dispersal area
- ☐ Estimate the Daily Design Flow for the new use
- ☐ Establish whether the existing system meets standards for the new use, and
- ☐ Document the upgrades needed to comply with standards.

II- 2.2 Special circumstances

See Volume III for guidance on the following special circumstances:

- Systems that will be used seasonally.
- Systems in isolated or restricted access areas.
- Off grid systems.
- Multiple homes on the same property.
- Use of adjacent property (off-site discharge).

III- 2.1.2 REPAIR OF AN EXISTING SYSTEM**III- 2.1.2.1 Re-use of system components**

In some circumstances, as an alternative to replacing or rebuilding the system, an AP may consider continued re-using some components or portions of the system. When re-using components:

- Obtain original documentation (example permit or filing) for the system, if available.
- Inspect and document the system. Including the following:
 - Assess the vertical separation below the dispersal area.
 - Assess system components, to find if they are operating as intended by the original design.
 - Assess tanks for leakage and treatment components for performance.
 - Assess the dispersal area for soil clogging.
 - Consider the potential lifespan of a component which is re-used.

For older systems, full system replacement, rather than partial replacement or repair, may serve the owner's interests. Inform the homeowner about alternatives for replacement and repair.

A tank with capacity 10% less than that specified by the standards of this Manual may be considered adequate for re use when upgrading the dispersal area, as long as it meets all other standards of this Manual.

III- 2.1.2.2 Sewage Disposal Regulation and permits

When assessing sewerage systems constructed under permit under the Sewage Disposal Regulation (SDR), a copy of the SDR may be obtained from the Health Authority.

Obtain an "authorization to operate" for the system from the owner's records or at the Health Authority. If no authorization can be found, then assess the system based on the standards of this Manual.

III- 2.1.3 SYSTEM UPGRADES

If the system is being upgraded to serve a new or expanded use (with a different Daily Design Flow than the original design) then this is an upgrade, not a repair, and the sewerage system should meet all standards of this Manual.

III- 2.1.4 NEW USE OF EXISTING SYSTEMS

As an option, an existing sewerage system may be considered suitable for re use if:

- The system is less than 15 years old, and
- the system is operating under an authorization to operate issued under the Sewage Disposal Regulation, or the system has a filing and Letter of Certification submitted under the SSR, and
- the system met the standards of the day for the proposed new Daily Design Flow, and
- the system is functioning to current performance standards.

If the system does not meet all four conditions above, then complete an evaluation. This should include site and soil evaluation.

III- 2.1.5 PROPERLY FUNCTIONING DISPERSAL AREA

A properly functioning dispersal area provides:

- Infiltration and dispersal of effluent, without surfacing and without breakout occurring within the defined minimum Horizontal Setback to breakout.
- Treatment of effluent in the soil (or sand media and soil) to meet the performance standards of this manual.

For this reason, when assessing a system it is not adequate to consider only whether the dispersal field is satisfactorily "disposing" of the effluent. For discussion, see Volume IV Section IV- 2.2.2.4.

As testing soil treatment performance is difficult, vertical separation is used as a secondary indicator of adequate soil treatment performance for installed dispersal systems.

When assessing a dispersal system, confirm that the vertical separation meets the standards of this manual.

III- 2.2 Special circumstances**III- 2.2.1 SEASONAL USE**

Seasonal use systems should be installed in compliance with the Sewerage System Standard Practice Manual.

Type 2 or Type 3 systems may not be suitable for some seasonal dwellings, such as a vacation cottage, because these treatment systems typically run on electricity, and may rely on biological processes that cannot be sustained under seasonal use. When specifying a treatment system at a seasonal dwelling, provide measures to maintain the operation of the system during periods of intermittent power supply and limited water use.

III- 2.2.1.1 Operation and Maintenance of Systems Serving Seasonal Dwellings

Seasonal dwellings can pose unique challenges for operation and maintenance. Owner's manuals and maintenance plans should include operating instructions, safety precautions, and maintenance procedures for intermittent or seasonal use. Consider the following examples where owner action or inaction could cause risk:

- Lack of use can increase risk of freezing due to lack of warm water discharge and reduced heat generated in the tank from reduced biological activity.
- Freezing can cause backups, pump damage and other problems on start up. The owner may attempt to use or fix the system when it is frozen, and may attempt to thaw the frozen component.
- The water supply may need to be shut off, and certain lines and components may need to be drained.
- Electrical service may need to be disconnected. Treatment hardware such as blowers and re-circulating pumps may need to be shut down and restarted properly, and may need special storage when not in use.

APs should inform the owner that the adjustments listed above are, in fact, part of the maintenance. Therefore, the SSR restricts these activities to APs, or owners working under the supervision of APs. Owner's manuals should include appropriate cautionary notes and safety warnings, and maintenance plans should include proper procedures related to these issues.

III- 2.2.2 ISOLATED AND RESTRICTED ACCESS AREAS

If the property is difficult to access (for example, a water access only lot), plan the system considering: