

The 2013 AfG Workgroup recommended by consensus that new Septic Systems & SW be addressed separately, and that no allocation would be provided for septic systems, unless an OSDS had been on site previously.

Septic and SW Separate

- The 2013 AfG Workgroup Report recommend, by consensus, that Septic & SW be addressed separately:
- No allocation would be provided for septic systems, unless an OSDS had been on site previously.

6. Baseline	
What Allocation, if any, should be given to the Post-Development Load	
<i>On-Site Disposal Systems (OSDS)</i> Allocation should be equal to the load from any pre-existing OSDS, adjusted as if they had been upgraded to BAT	Work Group Consensus

If the WQTAC is going to depart from this consensus decision, allocations to new sources should be made according to similar logic used for other allocations underlying the WIP.

Those allocations were based on what can be reasonably expected from each sector using current state of the art and practice:

- For major WWTPs, ENR = 2.4 lbs/yr;
- For agriculture, optimal mixes of BMPs customized to each farm’s mix of crops and pasture, = 16 lbs/acre; and
- For stormwater, ESD to the MEP, = 4 lbs/ac/yr.

Nitrogen Allocation Rates



Agricultural Land
16 lbs/ac yr

Forest Land
3 lbs/ac yr

Urban Runoff ESD
Stormwater: 4 lbs/ac yr

Septic System Unit Loads

Location (Zone)	TN lbs/yr (EOS)	BAT lbs/yr (EOS)
Critical Area	18.6	9.3
Within 1000' of a Stream	11.6	5.8
> 1000' of a Stream	7.0	3.5
Average	9.9	4.95

LOADS REPRESENT STATEWIDE (EOS) RATES

Treatment	TN lbs/yr
WWTP secondary treatment	10.8
WWTP BNR treatment	4.8
WWTP ENR treatment	2.4
WWTP with allocated capacity	0

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To treat new septic systems in an even handed fashion, they should receive an allocation equal to that of a BAT system indicated in the right hand column of the table above (BAT lbs/yr EOS). Below, the middle column shows the offsets that would be necessary if septic systems were allocated loads consistent with an average household on sewer serviced by a treatment plant operating at ENR levels of treatment. The right hand column shows the offsets that would be required if they received an allocation equal to loads from a BAT system.

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Table: Septic System Estimated Offsets under 2 different allowances for different locations:

Location	ENR Treatment Allowance of 2.4 lbs/System	BAT Treatment Allowance of 50% of Load
Critical Area w/BAT	~6.9 lbs/sys	0
Elsewhere w/ BAT	~2.3 lbs/sys	0
Elsewhere w/o BAT	~6.9 lbs/sys	~4.7 lbs/sys

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These requirements would be straightforward to implement. Developers would have the options of installing BAT systems, paying a fee in lieu or purchasing nitrogen credits available on the market.