Wastewater Variance Process
June 13, 2024
Questions and Answers

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Below you will find the summary of the questions and answers (Q & A) from the live Webinar Series. For clarity and brevity, the live session of Q & A was trimmed from the original recording. Please keep in mind that this document is meant as a job aide. It does not create or confer any right for or on any person and does not operate to bind federal, state or local food safety regulatory agencies. If you have questions concerning interpretation or application of various portions, please reach out to your District Supervisor for assistance. A current District Map is posted at the top of the page where you found the recording and Q & A document.

Q: Can you further explain an "open ditch"? On Table-1 where it calls out a "stream or open ditch[4]" below table-1 it states, "[4] Sewage tanks and soil absorption systems should never be located in the drainage area of a sinkhole". My question is, what do you consider an open ditch?

A: An open ditch is where water converges and is transported to a lower elevation during wet conditions. Something can be considered an open ditch if it does not meet the requirements of a classified stream. A classified stream is a body of water that maintains a permanent flow or permanent pools during drought conditions and supports aquatic life.

Q: When applying the restrictions of the soil report with multiple pits, is it correct that we are to go off the most restrictive parameters of what is reported, even if they are using the least restrictive pit reported? For example, if pit 1 has a seasonally high-water table of 24" and pit 2 has a seasonally high-water table of 9 inches, we would base our vertical separation on the 9-inch margin.

A: Typically, yes. If there is more than one soil report for a property, one will be more restrictive. Without having the information it's harder to decide which to use – typically use the more restrictive one. If they are using the least restrictive pit – the lateral field must stay within the boundary of the least restrictive pit. This is why it is important for the report to provide boundaries for each pit and for the installer to stay within those set boundaries when installing the dispersal field.

Q: If you approve UV pretreatment on a variance, do you require maintenance for an extended number of years?

A: By rule, the state cannot require any kind of maintenance. When variances are approved it will be the property owner's responsibility to maintain. When approving a variance, I include in the notes that the homeowner is required to do maintenance to maintain the system in good working order. Counties with their own ordinance(s) can be more restrictive and have written into their regulation the

required maintenance. This could be verified by reports stating that the system has been inspected and functioning properly.

Q: I had a call about someone who has 5 acres and is wanting to put in a small RV campground. Can you point me in some good direction for this call?

A: There can be many nuances of soil and we would need more information about the site before going into depth. District staff can provide information. If you are a new EHS and haven't been able to attend class, please work with BEHS district staff for permitting questions. Any questions beyond that can be directed to the OWP program at OnsiteProgram@health.mo.gov .

Q: Can you talk about what percentage of variances are issued in Missouri compared to all applications submitted?

A: About 10-15% variances issued from those that are reviewed by program. For example, there were roughly 225 permits last year for around 30 Counties and about 25 variances were issued.

Q: Can you talk about how NSF standards work and why the program relies on them? Are all states leaning into NSF standards are much as Missouri?

A: Other states also use NSF standards. When the onsite regulations were developed, we reviewed several state's rules. We liked what North Caroline had in place, so we adopted a lot of NC's rules.

Missouri uses the NSF standards for testing for secondary treatment standards such as ATUs. This keeps MO from having to do rigorous testing every time a new product is developed. Ex: ATUs are tested based on domestic wastewater – not commercial. The unit is tested with real conditions; they abuse the unit; starve the unit; use it as it would normally be used. Once it has documentation from NSF, it is approved for use in MO.

NSF Class 1 Standard 40 units are tested on levels of biochemical oxygen demand (BOD_5) and total suspended solids (TSS) that are achieved after treatment. NSF 245 also tests ATUs for total nitrogen reduction, which the program sometimes requires around bodies of water or drinking wells when certain setbacks cannot be met.

Map of counties with Ordinances:
https://health.mo.gov/living/environment/onsite/pdf/onsiteauthoritymap.pdf