

Submission

No 11

INQUIRY INTO MANAGEMENT OF DOMESTIC WASTEWATER

Organisation: Bega Valley Shire Council

Name: Mr Tait Farram

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15 December 2011

Legislative Assembly
Committee on Environment and Regulation
Parliament House
Macquarie Street
SYDNEY NSW 2000

Attention: Chris Patterson MP

Dear Sir,

INQUIRY INTO THE MANAGEMENT OF DOMESTIC WASTEWATER

Bega Valley Shire Council (BVSC) would like to make a submission to the above inquiry.

BVSC has had over 6000 systems of on-site sewerage management registered and has had a far greater number before the recent upgrade of five small villages to reticulated sewerage schemes. There are also some systems that have not been registered and are being added the register as they are inspected during the inspection process.

Bega Council has been inspecting these systems since 1999 as a result of NSW State legislation requiring these inspections to occur. These inspections apply to all properties that do not have a direct connection to one of Councils sewage treatment plants. Currently BVSC re-inspect systems of on-site sewerage management for re-approval every one, three or five years depending on the risk of the site and the system to the environment and public health.

The risk categories placed on the systems are as follows:

Low Risk – 5 years approval

>100m from a water-body, river, creek or dam.

High Risk – 3 years approval

<100m from a water-body, river or creek.

<40m from a dam or intermittent creek

<2000m² property and a reticulated water supply

Critical Risk – 1 year approval

<150m from an oyster growing lake

<2km upstream and within 100m of the river of a town water draw point.

Around 550 inspections are conducted yearly by one officer and inspection fees have increased over the past 11 years of inspections from \$70 to \$100 per approval.

Multiple systems on a single parcel of land are only charged the one fee of \$100; however all parcels of land that have an approval issued are also charged \$20 annually on their rates notices to help cover the costs of the inspection program the issue of the approval and testing requirements needed from time to time.

In the future it is envisaged that Council will adopt an increase in the rates fee to alleviate inspection fees and make it easier for home-owners to cover the costs of this inspection process. E.g. - No inspection fee of \$100.

Quite often systems are found to be failing and require remediation or maintenance works to be undertaken by the home-owner (depending on the works required a specific time-frame is given to the home-owner for these works to be completed by). If a home-owner does not comply; a notice of intention to serve an order is issued, an order is issued if no compliance with notice and court attendance is the final outcome for non-compliance with the requirements of the license issued.

BVSC is not in a financial position to undertake the required works for the home-owner and organise payment overtime if the home-owner can't afford the works to be done.

Over my past seven years as an on-site sewerage management compliance inspector for BVSC I have come across many issues with the state wide septic safe program, including;

- Inconsistencies between Councils across NSW,
For example: some are doing inspections, some are not doing inspections, some approvals are indefinite and some have a time-line which requires re-inspection.
- Service agents for Aerated waste-water treatment systems (AWTS),
For example: some service agents are looking at the irrigation areas for AWTS and some are not because they say they are not required to do so.
- Service agent reporting sheets and the information taken for reports,
For example: Some reports are illegible and can't be read due to carbon copy and some are lacking the information required.
- Service agent training.
For example: service agents are required to be trained by an accredited trainer – the training is currently expensive and is only held a couple of times yearly in specific locations.
- Lack of training available for home-owners to potentially service their own systems of AWTS.
For example: some home-owners are no longer getting the AWTS serviced for various reasons and wish to service their own system.
There is no course available to the general public which would allow them to conduct their own servicing of the system.

I would not necessarily suggest that properties that produce foods for sale get an increased inspection rate of the system of on-site sewerage management, as many food growers in my local Government area already understand the dangers of using effluent for irrigating crops and the system is a sufficient distance from the crops that it would not affect them.

However due to the nature of these various systems and the nature of people themselves we cannot rely that they will work forever and as the owners do change at times; I would suggest that Councils do inspect these premises intermittently.

In my experiences as an inspector of these systems; it is surprising that many people in the general public do not understand the dangers of effluent and using it for irrigation purposes especially on vegetable crops. Many people who have an AWTS think that because the water is treated that it can be used for the purpose of watering garden crops and educating the home-owner of the dangers associated with such a practice is required.

Inspections around oyster growing lakes and town-water draw points are essential to be done yearly due to the high risk potential for contamination of these food sources by failing septic systems.

Other issues I come across as an inspector of on-site sewerage management systems:

- **Failing land application areas**
E.g. - lack of an approvable land application area, insufficient capacity, stock/vehicle damage, defects in installation, lack of maintenance, solids entering land application areas, clay soils, high water tables and limited room for future application areas can all be an issue for land application areas.
- **Broken septic tanks**
E.g. - deteriorating lids, homemade septic tanks, tree root invasion and no t-pieces in at the inlet and outlet of the septic tank.
- **Broken Pipes**
E.g. – tree root invasion, deterioration and damage to pipes.
- **Broken pumps**
E.g. – appropriate sizing can be an issue, as well as old brands not having replacement parts.
NB: High and Low level alarm should be installed.
- **Servicing Requirements for AWTs and other systems**
E.g. - Quarterly service required for all AWTs systems and yearly servicing required for Biolitix systems. (Some are not being serviced; some are by the home-owner).
- **Broken, blocked or damaged irrigation areas for an AWTs or grey water treatment system.**
E.g. - connect appropriate sprinklers and appropriate irrigation lines to formalise a land application area/s, replace sprinkler heads, install in-line filters, bury distribution lines, add sprinklers, add further application areas, provide warning signs, allow appropriate buffers from property boundaries, neighbours and water bodies.
- **Storing untreated grey water.**
E.g. - Untreated grey water must not be stored and all grey water and kitchen wastes must be diverted to the septic tank or an absorption trench.
Grey water can be re-used via a bucket within the first 24 hrs.
- **Diverting waste-water onto neighbouring properties.**
E.g. – Grey water diversions to neighbouring properties are sometimes found and must be diverted back to the septic tank or an alternative land application area.
Property owners diverting kitchen wastes and grey water to their own land is also an issue for the home-owner to rectify.
- **Diverting waste-water into the environment.**
E.g. – Some properties have installed overflow pipes in the land application areas; these must be removed or capped and not used to allow the trench to overflow.
- **Pumping out septic tanks**
E.g. - The tank should be pumped every 5-7 yrs to prevent solids entering the land application area/s.
Homeowners must not pump-out the septic tank or absorption trench themselves; all pumps associated with this practice must be removed.
Home-owners pumping out their absorption trenches through the inspection openings must cease immediately also.
- **Internal and external drainage issues**
E.g. – smells, e-duct vent, blockages, no overflow gullies, illegal drainage work, tree roots, ceramic pipes, grease traps, stink vents, below the slab drainage, p and s traps.
- **Upgrading the entire system**
E.g. - The system may be failing and there is no option but to install an alternative system that will work with the sites restrictions.

Benefits of the program

- Illegal development is often identified.
- Illegal drainage works are often identified.
- Home-owners and tenants are educated about their specific systems and how to look after them.
- Failing systems are identified and systems are upgraded or fixed.
- Areas of improvements and maintenance for systems are identified for home-owners.
- Service agents of AWTS are audited.
- Areas of critical and high risk are identified.
- Food sources are protected and drinking water is protected.
- The Environment and public health are protected.
- Councils own systems are upgraded and fixed or maintained more often.
- The inspection program compliments other work conducted by Council including river and beach sampling programs.
- Home-owners are notified through the local news papers and radio stations about the program.
- Pre-purchase inspections are conducted at the request of purchasers, home-owners, solicitors or conveyances.

Problems for the program

- Approx. 6000 systems and 1 inspector. (Previous years Council has had 3 inspectors)
- Systems "Approval to Operate" have expired many years before another inspection due to the number of inspections required across the Shire.
- Lack of other staff to take on remote inspections.
- Councils inheriting approvals for systems previously held by the EPA.
- Problems associated with inspecting premises without formal notification to home-owners due to logistical difficulties in attempting to contact and meet every home-owner on site at a specific time.

What would help the program?

- A component of monetary support should have been provided for Councils to employ sufficient staff and provide a vehicle for this important and demanding role. The inspection regime adopted by Council has resulted in the ratepayers of the shire having to pay for the inspection and re-approval of their system/s to be issued to them.
- A standardised report form should be developed for service agents of AWTS to submit to Councils and home-owners.
- Affordable AWTS training courses for home-owners should be developed.
- On-site sewerage management educational material and advertisements to further educate the public of the rules and regulations in relation to; on-site domestic waste-water uses and re-uses as well as the dangers of untreated effluent.
- The development of a matrix for developers or home-builders to design systems that will work on specific soil types and site constraints to alleviate the costs of soil report requirements for new systems to be installed.
- The development of third party testing programs for the different types of AWTS to help determine the quality of the effluent being sprayed in many cases; during the systems operation.
- State-wide legislation should be upheld to force all NSW Councils to adopt a septic safe program that would see more consistency with the management of on-site domestic waste water across the State of NSW.
- There is a lack of any tangible support from the Division of Local Government in supporting technical officers working for Local Government bodies across the state.

- There are issues surrounding the duplication – of State Government agencies; NSW Health is partly involved in accreditation of some types of on-site sewerage management systems. E.g. - Aerated Wastewater Treatment Systems (AWTS) but not others. The role of the Division of Local Government is unclear. It would be better if there was a “One stop shop” approach to support Local Government; similar to the NSW Food Authority and Local Government.

I hope that the information provided above is helpful in assisting you with your enquiry.

If you wish to discuss the comments or require further information please do not hesitate to contact me at Council on (02) 64 992222.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Tait Farram', with a stylized, cursive script.

Tait Farram
Environmental Health Officer
Bega Valley Shire Council