

Information regarding a proposed Operating Permit Program for Total Containment Lagoons

The Division of Water Quality is considering a program to require an Operating Permit for total containment or non-discharging lagoon facilities. This paper is intended to provide potential permittees with information regarding the background, general requirements, the need and advantages of such a program.

There are currently about 65 municipalities, recreational campgrounds and highway rest stops using non-discharging lagoons in the State of Utah. They are the most commonly used wastewater treatment systems for small communities because of low construction and operating costs. They work well as long as they are properly operated and maintained.

Because they hold large amounts of water, lagoons are at risk for leaking excessively, causing groundwater contamination. Other problems, like organic or hydraulic overloading, or structural or treatment failures could occur if the systems are not properly maintained. The potential liabilities to the community could be significant, and may include: fines for violations, and unanticipated and expensive projects to fix the problems.

Over the past few years several small communities have had to tackle such "emergency" projects, at much greater expense than if the problems had been discovered earlier through regular monitoring and reporting. If discovered early, these problems can be avoided, or anticipated far enough in advance to minimize the adverse impacts to the community.

For these reasons, the Division of Water Quality is proposing a basic Operating Permit program to monitor and report on the operation and condition of the lagoons. Currently there is no statewide permit program for total containment lagoon facilities, like there is for facilities that discharge to surface waters. Program data would be submitted with Monthly Operating Reports, which are currently required from all wastewater treatment facilities.

The proposed components of the Operating Permit program are:

- ✓ A renewable permit issued to operate the lagoon
- ✓ Periodic monitoring of operations and maintenance parameters
- ✓ Periodic reporting of that monitoring data.

The advantages of this program to communities are:

- ✓ Provide owners a reminder to periodically monitor the conditions of their systems
- ✓ Provide owners with valuable data to improve long-term planning efforts
- ✓ Reduce operation and maintenance costs
- ✓ Protect public health
- ✓ Help owners to avoid the need for crisis management due to failure of critical infrastructure and the resulting costly remediation efforts.

The Division of Water Quality is seeking feedback from communities regarding the feasibility of such a program. For comments please contact Matthew Garn at 801-538-9489 or mgarn@utah.gov.