

EPA Management Guidelines - Should I be a Responsible Management Entity?



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EPA Guidelines – Should I become an Responsible Management Entity? (RME)

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Should I become an RME? The EPA Management Guidelines present five model management schemes. Two of these management models use Responsible Management Entities to maintain systems. An RME does not have to be a utility, as an individual you may be able to fill the position of RME.

EPA'S MANAGEMENT GUIDELINES THE 5 MANAGEMENT MODELS

- Model 1- "Homeowner Awareness"
- Model 2 - "Maintenance Contracts"
- Model 3 - " Operating Permits"
- **Model 4 - "RME Operation and Maintenance"**
- **Model 5 - "RME Ownership"**

Responsible Management Entity

(RME): A legal entity responsible for providing various management services with the requisite managerial, financial, and technical capacity to ensure the long-term, cost effective management of decentralized onsite and/or cluster wastewater treatment facilities in accordance with applicable regulations and performance requirements.

RME's may be:

- Private or public utility
- Governmental or nongovernmental organizations
- Rural electrical cooperatives
- Sanitation districts
- **A PRIVATE COMPANY (YOU)**

RESPONSIBLE MANAGEMENT ENTITIES

- Can provide a vital role in protecting public health and the environment by providing management services for decentralized wastewater systems.
- Functioning much like centralized sewer districts, an RME has access to the technical expertise to choose appropriate treatment technologies, oversee installation and ensure ongoing O & M.

RESPONSIBLE MANAGEMENT ENTITIES

- With a growing recognition of the environmental damage brought on by existing, unmaintained septic systems (which have been ignored for many years), the need for RME's is great.



RESPONSIBLE MANAGEMENT ENTITIES

- The decentralized wastewater industry is composed of numerous small businesses, with innumerable stakeholders presenting significant roadblocks to greater professionalism.
- Historically, the wastewater community has viewed decentralized treatment systems as a stop gap measure until a conventional, centralized system can be built.

RESPONSIBLE MANAGEMENT ENTITIES

- Recently, as on-site treatment technologies have gained greater acceptance, the USEPA agreed that decentralized systems can be a long term solution.
- Implementation of decentralized systems, however, will require a greater level of **professionalism** from the industry.
- The approval, adoption and incorporation of new ideas and treatment technologies are left to individual local officials, some of whom embrace these technologies and some of whom completely shun them.

RESPONSIBLE MANAGEMENT ENTITIES

- RME's are needed to coordinate the many different needs of homeowners, installers, regulatory officials and other stakeholders.
- RME's would be the administrators of decentralized wastewater treatment districts and can provide the professionalism needed by the industry.

Model 4 – “RME Operation and Maintenance”

- ***The objective of this management model is to ensure that decentralized systems consistently meet performance criteria and standards set for these systems. The RME is responsible for the operation and performance of these systems within their service areas and paid through a long term contract by the homeowner.***

TYPICAL APPLICATIONS

- Environmentally sensitive areas (sole-source aquifers, wellhead or source water protection zones, critical aquatic habitats and outstanding resource waters)
- Cluster systems

DESCRIPTION

- Professional operation & maintenance RME
- System performance and monitoring
- Operating permits issued directly to the RME, system ownership remains with the property owner
- Inventory of all systems
- Tracking of operating permits, compliance monitoring

BENEFITS

- Long-term maintenance
- One permit for a group of systems



LIMITATIONS

- Often takes state or local legislation to define and recognize RME's
- Easement/right of entry approval needed from homeowner
- Oversight of RME by regulatory authority
- Rate structure oversight
 - States must establish a regulatory structure to oversee RME rate charges

CONSIDERATIONS WHEN BECOMING A MODEL 4 RME

- BUSINESS MODEL – will the numbers work for me?
 - Established company
 - O & M
 - Service contracts
 - Installation
 - Pumping
 - Establishing company
 - Partnering with established individuals to provide the necessary functions

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ PUBLIC EDUCATION AND PARTICIPATION

- Inform homeowner and/or user of responsibilities
- Inform homeowner and/or user of RME requirements and prohibited uses of system



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ PLANNING

- Develop criteria required for systems to be accepted into O & M program and inform owners
- Continuously evaluate existing wastewater treatment needs and forecast future needs



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ PERFORMANCE

- Operate systems
- Systems must comply with performance criteria stipulated in the design and operating permits



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ TRAINING, CERTIFICATION AND LICENSING

- Contract with certified/licensed service providers
- Obtain appropriate certifications and licenses
- Continuing education



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ SITE EVALUATION AND DESIGN

- Meets needs of homeowner
- Will it fit
- Will it comply



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ CONSTRUCTION

- Oversight of installation
- Alteration or changes to design plan must be approved by all parties involved

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ OPERATION AND MAINTENANCE

- Operate and maintain system in accordance with operating permit
- Submit compliance and monitoring reports to proper authority and homeowner
- Relay potential problems which can become a noncompliance event



RESIDUALS MANAGEMENT



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ RESIDUALS MANAGEMENT

- Hire a certified/licensed pumper/hauler to remove, treat and dispose of residuals
- Make sure that all state, federal, tribal and local requirements are met in the pumping, hauling and disposal of treatment system residuals
- Inventory local treatment facilities and disposal options for residuals from systems being managed and make sure that capacities are available for inclement weather

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ COMPLIANCE, INSPECTIONS AND MONITORING

- Submit compliance monitoring reports to the regulatory authority as stipulated in operating and installation permit
- Submit compliance inspection reports certified by the licensed inspector prior to applying for renewal of operating permit
- Conduct regular reviews of management program with owner/user and regulatory authority to optimize systems operations program
- Use only certified/licensed inspector to inspect system compliance status

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ CORRECTIVE ACTIONS

- Comply with the terms and conditions of the negotiated compliance schedule for this system performance
- Comply with regulatory authority installation permits for any negotiated compliance actions



RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ RECORD KEEPING

- Maintain system monitoring and service records
- Inventory, collect and provide permit information to the regulatory authority
- Maintain data base on all work and/or problems associated with systems under RME management

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

➤ FINANCIAL ASSISTANCE AND FUNDING

- Conduct regular reviews of system with owner/user and regulatory authority to optimize operations
- Be prepared to inform homeowner/user of current financial opportunities in local area of the RME

Model 5 – “RME Ownership”

- The objective of this model is to provide professional management of the planning, siting, design, construction, operation and maintenance of onsite or decentralized systems. RME's own and manage the individual and clustered systems.

TYPICAL APPLICATIONS

- Environmentally sensitive areas (sole-source aquifers, wellhead or source water protection zones, critical aquatic habitats and outstanding resource waters)
- Cluster systems serving multiple properties under different ownership

DESCRIPTION

- Professional management
- System performance and monitoring
- Regulatory oversight through NPDES or other permits
- Operating permits issued directly to the RME, **system ownership remains with the RME**
- Inventory of all systems
- Tracking of operating permits, compliance monitoring

BENEFITS

- High level of oversight
- Effective planning and watershed management
- Greatest protection of environmental resources and homeowner investment

LIMITATIONS

- Often takes state or local legislation to define and recognize RME's
- Easement/right of entry approval needed from homeowner
- Oversight of RME by regulatory authority
- Significant financial investment
- Rate structure oversight
 - States must establish a regulatory structure to oversee RME rate charges

RESPONSIBILITIES

WHEN YOU CHOOSE TO DECLARE YOURSELF AN RME

- SAME AS MODEL 4 EXCEPT:
 - RME owns the system and is responsible for maintaining, repairing and upgrading due to system inadequacies or failures.
 - **Remember you now own this system and should have money in escrow from the user and must be financially sound to continue your RME program**

QUESTIONS?