

Using a Responsible Management Entity (RME) to Manage Tribal Onsite (Septic) Wastewater Treatment Systems

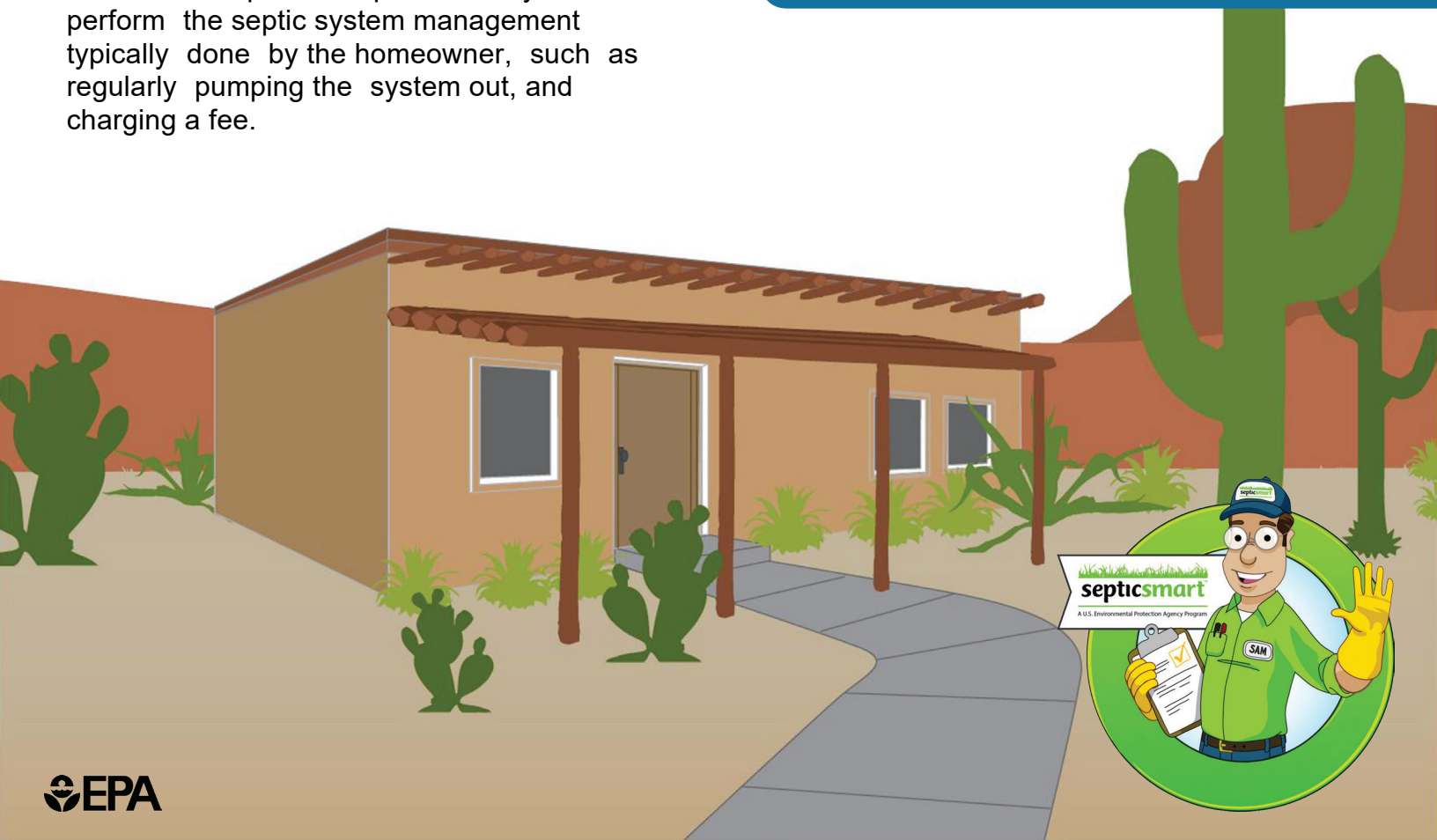
Many tribal communities use septic systems to treat wastewater for their homes and businesses. Even if a community has a centralized sewer system, there are often homes in portions of the community that are serviced by septic systems.

Proper management of septic systems is essential and provides significant benefits to residents and the community at large.

Many communities are using a centralized approach or a Responsible Management Entity (RME) for oversight and maintenance of septic systems.

A RME is a public or private entity that will perform the septic system management typically done by the homeowner, such as regularly pumping the system out, and charging a fee.

Given the rural nature of many tribal communities, septic systems are one of the more common ways to treat wastewater in tribal communities. Septic systems can provide a high level of public health and natural resource protection if properly planned, sited, designed, constructed, operated and maintained. More information about septic systems in tribal communities, including the design considerations of septic systems, can be found at: [Tribal Management of Onsite Wastewater Treatment Systems](http://www.epa.gov/tribal/epa-homeowners-guide-septic-systems-tribal-communities). (www.epa.gov/tribal/epa-homeowners-guide-septic-systems-tribal-communities)



Why should Septic Systems be Managed?

Septic systems that are improperly managed do not provide the level of treatment necessary to adequately protect public health and water quality. Managing septic systems is important to ensure their performance and reliability. Properly managed septic systems:

- Save homeowners money as their systems will last longer;
- Protect the property value;
- Keep residents and the community healthy; and
- Protect the environment.

Who manages Septic Systems?

Residents are usually responsible for maintaining their septic system on their property. However, many are often not aware of the need for routine system maintenance or may wait until there is a back-up in the house or in the yard before attending to the system. Often, the tribal government or tribal water / wastewater division will be called to deal with a failing septic system.

EPA has developed *Voluntary National Guidelines for Management of Onsite and Clustered (Decentralized) Wastewater Treatment Systems* at www.epa.gov/septic/septic-systems-guidance that describe five management models with progressively increasing management controls. The RME model outlines that the operation and maintenance of septic systems are conducted by a RME and replaces the management done by the homeowner. Establishing a RME provides greater assurance of control over the performance of the septic systems.

A RME can be a tribal or non-tribal, private or public entity. A management program can involve, in varying degrees: regulatory and elected officials, developers, builders, soil and site evaluators, engineers, designers, contractors, installers, manufacturers, pumpers, haulers, inspectors, and property owners. Establishing roles and responsibilities for all partners involved is important to ensure proper system management.

Some larger RMEs that serve multiple customers and communities might be required to follow the US EPA, or local state, Underground Injection Control (UIC) Class V regulations, more information at: www.epa.gov/uic/class-v-wells-injection-non-hazardous-fluids-or-above-underground-sources-drinking-water .



How is a RME established?

A RME is a private business or public entity that provides technical, managerial, and financial support; some things to consider are:

- Whether or not the RME is a public or private, tribal or non-tribal entity, it should be defined and recognized by the tribal government. The tribal government may need to provide oversight of the RME, especially to supervise the rate structures.
- Community engagement when developing the RME services, including rates, is important to ensure that the public will accept and support the RME.
- Easement or right-of-way entry approval and/or access agreements will likely be needed from the residents to access septic systems for inspection & pump out.
- RMEs will often need to market their services in order to stay in business.
- The RME will likely need to develop a business plan that will cover service costs. If it is a private for-profit entity, the plan will likely also need to account for a profit margin.

What should an RME include in a system management plan?

While there are many components of a comprehensive septic system management plan, a key piece is the operation and maintenance of the systems. A thorough plan will include:

- Inspections by a professional at least once every three years;
- Recommend tank pumping once every three years;
- Proper waste disposal techniques;
- Septic dain-field care; and
- Fee rate structure for both residential customers and sewerage disposal.

Other aspects include conducting an inventory of septic systems in the community and ensuring that new systems are properly sited, designed and constructed. See *EPA's SepticSmart Homeowners website* at www.epa.gov/septic.

Developing a septic system management plan will have benefits such as:

- Less frequent urgent calls from residents requesting technical or monetary assistance for a failing septic system;
- Maintaining the water quality and health of the community and the surrounding environment, and
- Establishing an organization or working with a licensed septic system professional with the skills and experience to manage septic systems properly;

To contact someone directly at EPA about septic systems and setting up an RME, see:
www.epa.gov/septic/forms/contact-us-about-septic-systems.

Additional considerations when establishing a RME for Tribal Communities

Non-tribal entities: A RME could be a tribal or non-tribal entity. If there are entities in the surrounding area that have established services, it may be more appropriate for the community to use those services. Non-tribal entities may need to have special agreements with the tribe to address tribal sovereignty concerns.

Sharing equipment: Tribal entities could consider sharing equipment in a cooperative agreement with nearby communities. A cooperative agreement would allow an entity to use shared large assets, like septic pump trucks, without having to purchase the assets.

Wastewater disposal: If a tribal entity is the RME and is managing septic system pump outs within the community, there needs to be a safe and approved disposal location for the collected sewerage. A tribe that has a lagoon or other wastewater facility could potentially handle the collected sewerage. Otherwise, the tribe will need to identify a nearby treatment facility that will accept the materials. The RME should expect the receiving facility to charge a fee.

Rates: A RME should establish rates for operation and maintenance services and it would be good practice to institute follow up practices so that the RME receives payment. Linking RME service fees with water, gas, cable, internet bills or other services can help to ensure payment.

Regulations: Developing and incorporating *Septic Management Guidelines* (www.epa.gov/septic/septic-systems-guidance) into tribal ordinances or regulations can be an important step to protect the tribe's drinking water sources and public health. Enforcement of established management guidelines, such as service schedule, service payment, and fines, is more likely to happen if septic system regulations have been established.



Further Information

For more information, visit EPA's Septic System website (www.epa.gov/septic) or Indian Health Service's Guide to Maintaining Septic Systems (www.ihs.gov/california/tasks/sites/default/assets/File/SFC-MaintainingYourSepticSystemGuide.pdf).

January 2018
EPA Document
No. 830K17003