


# TCEQ Interoffice Memorandum

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**To:**  Susan M. Jablonski, P.E., Central Texas Area Director

**Thru:** David Van Soest, Regional Director, Austin and Waco Regions  
Lori Wilson, Assistant Regional Director, Austin and Waco Regions  
Robert Sadlier, Section Manager, Edwards Aquifer Protection Program

**From:** Edwards Aquifer Protection Program Committee

**Date:** May 12, 2021

**Subject:** Refining the Definition of an Organized Sewage Collection System (SCS)

The Edwards Aquifer Protection Program (EAPP) regulates activities that have the potential to pollute the Edwards Aquifer. The purpose of this memorandum is to clarify what can be considered an organized Sewage Collection System (SCS) if constructed over the Recharge Zone of the Edwards Aquifer.

Both the EAPP and the regulated community will benefit from a written policy providing clarification on the definition of an SCS and guidance on making rule applicability determinations, as well as preparing and evaluating EAPP applications.

The revised interpretation of the definition of an SCS plan will outline who is required to submit a plan and submit associated fees to TCEQ for review and approval.

## **Brief Description of Issue**

Historically, the regulated community proposed organized SCS based on the interpretation that a collection system starts from the convergence of two wastewater lateral lines, which is consistent with the definition of “private service lateral” outlined in Title 30, Texas Administrative Code Chapter 213 (30 TAC Chapter 213). The SCS designed as either conventional collection systems, or alternative collection system must meet the design criteria of both 30 TAC Chapters 217 and 213.

EAPP interpretation was not fully aligned with the definition and design criteria described in 30 TAC Chapter 217 when a collection system unit was proposed for a single building/structure.

## **Background**

An organized SCS is any public or private sewage system for the collection and conveyance of sewage to a treatment and disposal system that is regulated pursuant to rules of the commission and provisions of Texas Water Code Chapter 26 (TWC 26). A sewage collection system must be designed to meet the requirements of 30 TAC Chapter 217, Design Criteria for Domestic Wastewater Systems and 30 TAC Chapter 213, Edwards Aquifer.

The 30 TAC Chapters 213 and 217 contain several definitions for organized sewage collection system or alternative collection systems, as well as for private service lateral or building lateral which are discussed below.

## **Organized Sewage Collection System**

The 30 TAC Subsection 217.2(13) defines a collection system as “pipes, conduits, lift stations, force mains, and all other constructions, devices, and appurtenant appliances used to transport domestic wastewater to a wastewater treatment facility” and 30 TAC Subsection 217.2(14)

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defines a collection system unit as “a part of a collection system that performs a basic step in the transport of wastewater to a wastewater treatment facility, provides access to the collection system, or is an integral safety feature of the collection system (e.g., pipeline, lift station, manhole, air release valve, etc.).”

The 30 TAC Subsection 213.3(22) defines an organized sewage collection system as “any public or private sewage system for the collection and conveyance of sewage to a treatment and disposal system” that “may include lift stations, force mains, gravity lines, and any other appurtenance necessary for conveying wastewater from a generating facility to a treatment plant.”

The TWC 26, Subchapter A also defines sewer system as “pipelines, conduits, storm sewers, canals, pumping stations, force mains, and all other constructions, devices, and appurtenant appliances used to transport waste.”

## **Lateral**

The 30 TAC Subsection 217.2(11) defines a building lateral as “a pipe that conveys raw wastewater and connects the plumbing of a structure to a collection system pipe. For an alternative collection system, a pipe that conveys raw wastewater and connects the plumbing of a structure to an on-site component (e.g., grinder pump, vacuum valve pit, septic tank effluent pump). A building lateral is not a part of a collection system.”

The 30 TAC Subsection 213.3(26) provides a broader definition for a private service lateral as “a wastewater line extending from the building drain to an existing private or public sewage collection system or other place of disposal that provides service to one single-family residence or building, with the operation and maintenance as the sole responsibility of the tenant or owner of the building. A wastewater line extending from the convergence of private service laterals from more than one single-family residence or building is considered a sewage collection system.”

## **Consideration and Rules Interpretation**

Based on the definitions of the collection system presented above, an organized SCS is any public or private sewage system for the collection of wastewater from the generator and conveyance to a treatment and disposal system, that includes private and public units, gravity or under pressure lines or force mains, manholes, pump stations (lift stations, grinder pumps), and other appurtenances.

Based on the definition of laterals, a lateral is a pipe or line which extends from the building (drain or plumbing) to a sewage system (private or public) and does not include other components or units.

## **Committee Recommendation**

The EAPP recommends an organized SCS facility plan be required for systems that start at the convergence of two or more laterals serving more than one structure; or at a collection system unit (manhole, lift station, etc); or at an on-site component (grinder pump, vacuum valve pit, septic tank effluent pump) in the case of an alternative collection system. In turn, these plans will be reviewed in accordance to 30 TAC Chapter 217, Design Criteria for Domestic Wastewater Systems and 30 TAC Chapter 213, Edwards Aquifer.

This will result in consistency among EAPP staff and the regulated community when determining the applicability of the SCS rules for sites that include private laterals and collection system units.

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## [Feedback to the Committee](#)

The recommendation is accepted as proposed.

The recommendation is accepted with the following modifications. Comments:

[Click here to enter text.](#)

The recommendation is being returned for further consideration. Comments:

[Click here to enter text.](#)

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