



BOARD OF DIRECTORS
AGENDA LETTER

**Secretary of the Board of
Directors**

4699 Hollister Avenue,
Goleta, CA 93110
(805) 879-4621

Department Name: Water Supply &
Conservation
For Agenda Of: December 8, 2015
Estimated Time 10 minutes
Continued Item: Yes
If Yes, Date From: N/A

TO: Board of Directors

FROM: Department: Water Supply & Conservation
Contact Info: Ryan Drake, Water Supply & Conservation Manager

SUBJECT: Greywater and Simple System Permit Exemption

Legal Concurrence:

As to form: Yes.

Recommended Action:

- a) Receive information regarding California Plumbing Code greywater system permitting regulations, including a recent effort by the County of Santa Barbara to seek a permit exemption for defined “simple systems”; and
- b) Authorize the Board President to send a letter to the Santa Barbara County Chief Building Official indicating the District is not opposed to the County’s proposed permit exemption for “simple systems” within the District.

Summary Text:

Greywater Permitting and Simple System Exemption

Greywater is generally defined as untreated, gently used water from household washing machines, bathtubs, bathroom sinks, and showers. In California, wastewater from kitchen sinks and dishwashers is not considered “greywater” due to higher levels of microbes, and is therefore labeled as “blackwater.” Utilization of greywater has the potential to decrease potable water demand, by reusing water for irrigation that otherwise would be transported to sewer systems.

Current California regulations on greywater systems are included in the California Plumbing Code, Chapter 16: Alternate Water Sources for Non-potable Applications. In Goleta, greywater systems are regulated through the Santa Barbara County Building Department. Per the California Plumbing Code, it is unlawful for a person to construct a greywater system without first obtaining the appropriate construction permit with the designated local agency, with the

exception of a clothes washer system (Laundry-to-Landscape System). All California greywater systems must comply with the following summarized regulations:

- All greywater systems must be designed with a diverter valve to direct laundry water to the sewer or to landscape irrigation.
- Direction control of greywater shall be clearly labeled and readily assessable.
- The installation, change, or alteration of a greywater system does not include a potable water connection.
- Water used to wash contaminated garments or water containing hazardous materials, cannot be used as greywater irrigation.
- Greywater cannot be used in spray irrigation or be allowed to pond or runoff.
- The discharge point of greywater must be subsurface or underneath two inches of mulch or gravel to minimize human contact.

Greywater systems are divided into three categories: clothes washer systems, simple systems, and complex systems. Clothes washer systems involve the retrofit of washing machine effluent to landscape irrigation use through a drip irrigation system. Simple systems are those that exceed clothes washer systems but are limited to a discharge capacity of 250 gallons per day or less. Complex systems are any greywater systems that are not considered a clothes washer or simple system.

Currently, Santa Barbara County does not require a permit for a clothes washer system, but does require a building permit for the installation of a simple greywater system, typically bathroom sinks and showers. However, the California Plumbing Code provides that the appropriate Enforcing Agency (the Building Department in the County of Santa Barbara) may exempt simple systems from permitting requirements, after consulting with the local water provider:

Simple systems shall require a construction permit, unless exempted from a construction permit by the Enforcing Agency. The Enforcing Agency shall consult with the water purveyor for any public water system providing drinking water to the dwelling or non-residential structure before allowing an exemption from a construction permit.

District staff has been in contact with the Santa Barbara County Building Department and the Department of Public Works regarding simple system permitting. The Chief Building Official stated that the County Building Department is presently in favor of waiving the permit requirements for small systems, and has asked that the Department of Environmental Health assist the Building Department in crafting a workable exemption. The County has proposed a waiver of permits for simple systems that serve five bedrooms or less, gravity fed only, below the 250 gallon threshold.

Under the County's proposal, each water purveyor such as the District will be consulted formally. If the District were to oppose waiver of permit requirements for simple systems, then the County will not waive such permit requirements in District service territory. If the District were to support the waiver, then the County would issue waivers to interested customers in the District. The District has not currently received a formal waiver request from the Building Department, but is informed it may receive a letter within the next month.

Background:

The Water Management and Long Range Planning (WMLRP) Committee received a report on the County of Santa Barbara proposal to exempt small system greywater design from permitting requirements at its November 19, 2015 meeting. The Committee recommended to the Board that the District send a letter to the County Chief Building Official (Attachment 1) indicating it does not oppose the County's proposed permit exemption for simple systems.

Fiscal Analysis:

This update has no fiscal impact.

Attachments:

Attachment 1: Draft Letter to Santa Barbara County Department of Building & Safety

Authored by:

Ryan Drake, Water Supply and Conservation Manager

**Attachment 1: Draft Letter to Santa
Barbara County Department of Building &
Safety**



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December __, 2015

Massoud Abolhoda
Chief Building Official
Department of Building & Safety
County of Santa Barbara
123 East Anapamu St.
Santa Barbara, CA 93101-2058

Re: Construction Permit Exception for Greywater Simple Systems

Dear Mr. Abolhoda:

The Goleta Water District (District) understands the County of Santa Barbara Department of Building and Safety is proposing to exempt “Simple System” design greywater systems from construction permit requirements. Under this proposal, greywater systems that serve a one to two family dwelling with a discharge of 250 gallons per day or less, and exceed clothes washer systems, would be exempt. This letter is to inform you that the District does not oppose the County’s proposed permit exemption for Simple Systems within the District.

As you are aware, section 1603A.1.2 of the California Plumbing Code, allows an enforcing agency such as the County to exempt Simple Systems from permit requirements, but requires the enforcing agency to consult with the applicable water provider, such as the District, before allowing an exemption from a permit. On October 19, 2015, you indicated to District staff that the County would formally consult with the District ahead of issuing any permit exemptions within District boundaries. While the District has yet to receive a formal consultation for a proposed exemption, the District would like to confirm that it does not oppose the County’s proposed action.

The District has long offered rebates for laundry-to-landscape greywater systems, and we thank you for your efforts to streamline regulatory compliance for alternate water supply during this period of extreme drought. Should you have any questions, please feel free to contact Ryan Drake, Water Supply and Conservation Manager for the District, at (805) 879-4627.

Sincerely,

Lauren Hanson
President, Board of Directors
Goleta Water District