DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Indian Health Service
Rockville MD 20857

TO: Directors, Division of Sanitation Facilities Construction
All Areas

FROM: Director, Division of Sanitation Facilities Construction
Headquarters

SUBJECT: **End of FY 2002 SDS Update**

Due Date: The SDS update for the end of fiscal year 2002 will be due August 1, 2002. Please submit electronically to Carol Rogers in Headquarters DSFC.

Instructions: The supplemental instructions for this year's SDS submittal are attached and will be the same as last year with the addition of the items listed below.

Software:

The most recent version of **STARS (2.0.0.5)** is available for download. You must first download the "Enchilada" STARS version 2.0.0.4 located at ftp://ftp.ihs.gov/pubs/oph/dfee/Stars%20Installation/Enchilada/ then download the 2.0.0.5 "Upgrade" located at ftp://ftp.ihs.gov/pubs/oph/dfee/Stars%20Installation/.
A new version of STARS (3.0) should be released and available for download shortly after the SFC Data Systems course (20-21 March 2002). Version 3.0 will be available as a full enchilada download or as an upgrade for current users of STARS. When the new version is available, an email message will be sent out to all SFC Chief's. If you experience any problems with the upgrade or download process, please call Ramsey Hawasly or Carol Rogers for assistance (301-443-1046).

Community Deficiency Profiles

We experienced some difficulties with last year's update where the same homes were listed in more than one community. In some cases a large region, consisting of multiple communities, was listed in the Community Deficiency Profile (CDP) with the same homes as were listed in the individual communities. This resulted in a double counting of homes. Since the CDP is the one place where homes are not supposed to be double-counted and these numbers are used to total the number of homes for the Report to Congress, please only enter homes in one CDP.

The continued success of the SFC Program can be attributed in a large part to the effort you and your field staff have put into developing credible high quality SDS data supported by the tribes. Your continued emphasis on the SDS will help to assure a sanitation facilities construction program for the future to serve American Indian and Alaska Native homes and communities.

Should you have any question on this year's SDS update, please contact Carol Rogers, Staff Engineer, HQ-EEB. Once again thank you for your continued cooperation.

Ronald C. Ferguson, P.E.

Attachments

Supplemental SDS Guidance – 2000

1. **SDS Project Numbers:** Do not reuse SDS project numbers. It is difficult to track projects between years when the same number is used for different projects from one year to the next, the only exception is changes in phase described in the section on Solid Waste Projects below. New project numbers should be assigned in sequential order. New project numbers should be assigned in sequential numerical order. Retire numbers for funded or otherwise deleted projects. The software allows two-digit alpha or numeric characters for the Project and Phase portion of this field.

2. **Funded SDS Projects:** Be sure to convert funded SDS project to the "funded" status in the SDS application by using the menu selection "Utilities", then "Fund SDS Project". This will allow you to assign a PDS project number and transfer the project from SDS to a "Funded Projects" table. These funded projects may be viewed with the menu selections "View", then "Funded SDS Projects".

3. **Community Deficiency Profiles:** The format was changed in November of 1999. The new format allows a separate deficiency level for water, sewer and solid waste for each home Each Area has submitted their best estimate under the new format based on the end-of-year 1999 data. Please check and revise the information as needed for the current submittal, taking into account funded projects and more refined data which may be available. The data submitted previously will be used by the Regular Funds Allocation workgroup to begin revision of the allocation formula. In the case of a community with a RCRA approved solid waste disposal system in place, the community is at most a deficiency level 1 even if the homeowners in that community choose not to use the facility. The community deficiency profile data must be accurate and should account for every IHS eligible home in the community, therefore the total number of homes should be same for water, sewer and solid waste. This data is used for a variety of purposes including reports to Congress and as half of the allocation formula for the regular funds.

4. **Non-IHS Contributions:** If a project will be partially funded by a source other than IHS, enter the amounts of non-IHS funding in the spaces provided on the "Funding" tab of the SDS data entry form. Use the "Contribution Comments" narrative field on that page to explain the source of the contribution and any additional pertinent information. Note that all IHS projects must primarily serve Indian homes; non-IHS eligible portions of any SDS project should be funded from contributions, which should be noted. The non-IHS eligible portion of the project should have no effect on the deficiency level and SDS project score.

5. **Solid Waste:** All open dumps, which have been identified in the O&M Data System must have associated closure projects in the SDS inventory. This may be accomplished by either entering the O&M FDS number into the field provided on the "O&M Data" tab of SDS or in the "SDS/PDS" tab of PDS. Solid waste projects should be phased and prioritized such that the solid waste management plan precedes solid waste disposal alternatives such as RCRA approved landfills, transfer stations which, in turn, precede dump closures. Attached are the solid waste cleanup/disposal reporting criteria to be used for the next SDS update.

6. **Optional SDS Scoring Factors:** The "Local Conditions" scoring field described on page 24 of the February, 1993 SDS Guide, should only be used as a negative value and only with

specific tribal concurrence. The "Tribal Contributions" factor is optional per collective tribal consultation and should be applied uniformly for all tribes and all projects across the Area.

7. **Service Delivery Option:** The SDS allows input of codes to indicate whether a project will most likely be constructed via a Title I contract, Title III compact or IHS direct service. This information is needed for planning/tracking purposes and to be consistent with our efforts to develop "fair and reasonable" costs. This code is "Self Gov" on the "General" tab of the SDS data entry form. Note, adjust the cost of the projects according to the service delivery method anticipated.

8. **Non-Indian Communities:** SDS projects to upgrade/enlarge existing community systems in predominately non-Indian communities of less than 10,000 people can be included in the SDS. These "projects" typically are funding contributions towards community projects that are not managed by IHS; hence, they are not typical IHS projects. The IHS funding amount that can be indicated in SDS is only the portion of the project cost associated with improved services to Indian people. The SDS IHS funding amount should be calculated based on the project cost, less the prorated costs for all the commercial, industrial, governmental, and institutional establishments benefiting, and less the prorated costs for all to the non-Indian homes benefiting. Therefore, IHS costs would not be determined based on a straight Indian /Non-Indian population ratio (see Criteria document, Chapter 5, section V for more details). Use the "Contributions Comments" narrative field on the "Funding" tab to explain the source of the contribution and any additional pertinent information. Most projects for non-Indian communities should be deficiency level (DL) 2 projects, since they are to make capital improvements (e.g., add a water tank). All projects must have tribal scores by the appropriate tribe. The Indian and non-Indian population figures for each project should be included in the narratives. Headquarters DSFC will carefully review each of these project submissions. Projects in non-Indian communities that are classified by a Tribe or Area to be DL3 projects must have significant justification/documentation; otherwise they will be reclassified as DL 1 or DL2 projects. Please brief the tribes of these conditions.

9. **HUD Homes:** EPA and other entities may fund projects which are not eligible for IHS funding, such as those to serve HUD homes. To accommodate the listing of these in SDS, projects to serve exclusively HUD home for either individual systems or community systems (where HUD houses created the deficiency) can now be placed in the SDS, **BUT NOT FOR IHS FUNDING**. The necessary funding must be reported under the "Contributions" field and an explanation be placed in the "Contributions Comments" field (both located on the SDS "Funding" tab). It is preferred that these be stand-alone projects (i.e., the projects serve only HUD homes) so that there is no confusion about the entire project being ineligible for IHS funds. These projects would be scored similar to any other SDS projects. However, if they end up in the funding range, IHS funds cannot be used and the projects may go unfunded (passed over) if there are insufficient EPA (or other) funds.

10. **EPA SDWA Projects (not IHS eligible):** In order to allow Areas to input data for EPA SDWA projects that are ineligible for IHS funding please follow the same process as projects for HUD homes with an appropriate explanation in the "Contributions Comments" field in the "Funding" tab.

Criteria for Developing SDS Projects and Cost Estimates
For Solid Waste Disposal Sites Identified in the O&M Data System

1. Each OMDS open dumpsite identified must have an associated SDS project or a funded project in PDS. Multiple solid waste disposal sites can be addressed by one SDS project phase, however all solid waste disposal sites in a project phase should be at the same health risk level in OMDS (e.g., all high-risk sites in a community in one phase). Each Area should select an appropriate health score for each of the three levels of health risk for open dumps in OMDS, in other words, high-risk open dumps should have a higher health risk than moderate-risk sites. **The FDS number for each dumpsite in a project must be recorded in the "O&M" tab or the "SDS/PDS" tab of PDS, this will allow us to prepare reports on the status of open dumps.**

2. Every SDS solid waste project to close an open dump identified in OMDS must provide three distinct cost estimates, as described below. The three estimates may be identified in separate SDS project phases, or by including the cost for each in one SDS project using the appropriate data fields. If the cost is zero dollars for any of the three required cost estimates, it should be explicitly noted. If a choice is made to separate the phases and the open dump is currently in use, the preferred order of phases is to develop the solid waste management plan, then provide the solid waste disposal alternative and then close the open dump. Projects phases should be scored to allow this order of preference, if this cannot be accomplished the project should be completed in one phase. The three distinct estimates are as follows:

   Comprehensive Solid Waste Management Plan. Section 4002(b) of the Solid Waste Disposal Act, requires that the following be included as a minimum:

   1. Identify responsibilities of local and federal authorities in implementation of the plan.
   2. Prohibit the establishment of new open dumps.
   3. Provide for closing or upgrading of all existing open dumps.
   4. Provide for the establishment of regulatory powers as may be necessary to implement to plan.
   5. Provide that no local government shall be prohibited from entering into long-term contracts for the supply of solid waste to resource recovery facilities.
   6. Provide for resource conservation or recovery and for the disposal of solid waste in sanitary landfills or for any combination of practices as may be necessary to use or dispose of such waste in a manner that is environmentally sound.

   Existing site closure/upgrade, means the cost of work needed to close open dumps or upgrade by bringing them into compliance with applicable Federal standards. Closure means "the termination of operations at open dumps on Indian land or Alaska Native land and bringing such dumps into compliance with applicable Federal standards and regulation, or standards promulgated by an Indian tribal government or Alaska Native entity, if such standards are more stringent than the Federal standards and regulations." This work includes field investigations and testing, design and on-site work. Several open dump closures may be combined under one SDS project.

Solid waste disposal projects. The solid waste disposal project (and associated cost) listed in SDS is that which will most likely be recommended under the Comprehensive Waste Management Plan to replace the open dump. This project does not include the work of closure/upgrade of the existing sites.

3. Use what you consider to be the most likely alternative for future solid waste disposal that is consistent with any existing solid waste management plans. If the alternative is to haul everything off reservation, note the alternative in the SDS even if there are no associated capital costs. Tribal consultation is required when establishing the most likely solid waste alternatives and developing corresponding cost estimates.

4. Only currently IHS eligible costs are to be considered in the SDS project. Do not include the O&M costs (e.g., future long distance hauling off reservation) or the cost of post closure maintenance in the SDS estimate. Post closure cost estimates will be addressed at some later date using a methodology yet to be developed.

5. Use the most current EPA landfill design regulations when developing cost estimates for new landfills.

6. All SDS criteria will apply, including economic feasibility and other scoring criteria. Develop unit cost as before; count only homes that use the site or previously used the site. Dumpsites that do not meet the criteria of P.L. 103-399, that are eligible under P.L. 86-121 should also have estimates and should be kept in separate projects from those that are eligible under P.L. 103-399, and the box indicating that the project meets P.L. 103-399 should not be checked.

7. Unless you know or strongly suspect that a site contains hazardous wastes, consider all waste not to require special disposal/processing techniques. Although demolition wastes are considered to be industrial wastes by EPA, open dumps, which include waste from such places as demolished houses and tribal buildings can be considered for a SDS project. Other types of industrial wastes (e.g., disposal of waste form a lumber or farming operations) may not be included for closure in a SDS project.

8. Be as accurate in your estimates as possible given the time constraints; Congress will be appropriately advised that costs cannot be developed more accurately until the solid waste management plans are completed. Rule of thumb estimates, such as $50,000 per acre to cap a site properly in a dry area, may be used. Your estimates should be based on reasonable assumptions if challenged.

DL	SF	Deficiency
2	W	Abandoning existing wells in accordance with standards, or
2	W	Above ground well discharge causing operating problems, or
2	W	Additional flush hydrants to correct water quality problems, or
4	W	An unusual situation where deteriorated water distribution/ storage/treatment/ source facilities makes system inoperable, or deteriorated facilities or facility components not correctable by routine maintenance will cause system failure within two years, or
3	W	An unusual situation where deteriorated water distribution/ storage/treatment/source facilities makes system inoperable, or deteriorated facilities or facility components not correctable by routine maintenance will cause system failure within 4 years, or
2	W	Chlorination or fluoridation equipment needed to comply with current design standard (not required by regulations or because of history of microbial violations) , or
4	W	Community water source provides less than 35 gpcd for 10 days during the year on a regular basis, or
4	W	Community water system without water routinely for more than 10 days/year (inadequate facilities -no O&M problems).
2	W	Control system modifications required for efficient, effective operation which are not causing operational problems, or
1	W	Correcting drainage problems around wells and springs, or
2	W	Correcting iron bacteria problems, or
2	W	Correcting problems with different overflow elevations on storage tanks, or
3	W	Corrosion control to comply with safe drinking water act requirements, unless required to meet MCLs, or
2	W	Cross connection problems with potable water sources, or
3	W	Cross-connections with non-potable sources (distribution, storage, treatment, etc).
2	W	Current system operating pressure less than design standard of 20 psi, or
2	W	Deteriorated facilities not correctable by routine maintenance, or
2	W	Deteriorated individual water supply facilities not correctable by routine maintenance, or
2	W	Deteriorated service lines require replacement, or
2	W	Deteriorated water mains not correctable by routine maintenance (see exceptions DL3 and DL4), or
2	W	Deteriorated water source not correctable by routine maintenance, or
2	W	Deteriorated water storage facilities not correctable by routine maintenance, or
2	W	Deteriorated water treatment facilities not correctable by routine maintenance, or
2	W	Direct line from water source to storage needed to correct water treatment or distribution problems, or
3	W	Environmental compliance problem with water system, or
2	W	Excessive pressure surges in water mains causing operational problems, or
2	W	Facilities that cause infrequent problems related to Public Health Standards; e.g., low pressure situations, or
2	W	Facilities that do not meet current design standards; e.g., additional water source, additional water storage, increase main size, includes need to increase system capacity, chlorination and/or fluoridation not required by current regulations, or
2	W	Facilities that do not provide piped water in homes, which were specifically designed and constructed as centralized or water haul facilities, for economically feasible or technical considerations, or
2	W	Facilities that fail to meet secondary drinking water standards, or
2	W	Facility deficiencies such as inaccurate as-builts or equipment operating guides, or
2	W	Fencing around water source, or
2	W	Fencing around water storage facilities, or

DL	SF	Deficiency
2	W	Fencing around water treatment facility to meet design standard requirements, or
4	W	Five psi pressure under dynamic water flow conditions occurs daily in the distribution system, or
1	W	Fixing hydrants or gate valves, or
2	W	Inadequate storage for current use; e.g., 1-day storage, design standard 2-days storage based on applicable gpcd design criteria, or
4	W	Individual water haul system with on-site storage and plumbing (and piped water is feasible), or
2	W	Individual wells or springs do not provide water meeting secondary drinking water standards, or
3	W	Individual wells or springs with yields of less than 1 gpm or less than 75 gpcd capacity, or
2	W	Inoperable hydrants or gate valves require replacement, or
2	W	Iron bacteria problems, or
1	W	Items such as painting water storage tanks, replacing standby pumps, equipment repair, or
2	W	Looping of water line required to correct water quality or pressure problems in system, or
2	W	Major deficient facilities that require replacement because of physical condition; e.g., main replacement, storage tank replacement, etc., or
4	W	Major system component failure makes system inoperable; e.g., pump on an individual water system, water storage tank failure on a community water system, etc, or
5	W	Major system component failure makes system inoperable; e.g., pump on an individual water system, water storage tank on a community water system, etc.
2	W	Modification of facilities required to comply with seismic standards, or
2	W	Modifications to increase efficiency and effectiveness, solve operational problems and reduce cost, or
5	W	No piped water in home (exception - designed water hauling system or central watering facility where piped water is not economically or technically
4	W	No piped water in home (exception - designed water hauling system or central watering facility where piped water is not economically or technically
1	W	Painting hydrants or treatment equipment, or
2	W	Pollution source - water source separation, do not meet current standards, but no documented contamination problems on record, or
2	W	Providing safety cages on water storage tanks, or
2	W	Pumping cycle for pumps exceeds design standard; e.g., 16 hours, with a design standard of 12 hours, or
1	W	Repairing backup pumps, or
1	W	Repairing fencing or replacing locks, or
1	W	Repairing minor leaks piping connections, control connections, etc, or
1	W	Repairing or replacing markers, or
1	W	Replace chemical feed equipment.
1	W	Replacing well caps or well seals, or
1	W	Routine building repairs, individual or community, or
4	W	Seasonal dry wells or springs, or
2	W	Separate room for chemicals needed at water treatment facility, or
3	W	Significant problem with water quantity; system incapable of routinely maintaining established minimum pressure for public health: (i) May be source problem; (ii) May be storage problem; (iii) May be water main size problem, or
3	W	Significant water leakage problems due to deteriorated piping or joints, or
5	W	Spring incapable of providing drinking water that complies with regulations for microbial pathogens, or
4	W	Spring or well source incapable of providing drinking water that complies with regulations for microbial pathogens, or
2	W	Standby electrical power needs, or

DL	SF	Deficiency
2	W	Storage tank coatings do not meet current standards, or
4	W	Summer distribution system with watering point remainder of year, or
2	W	Surface water intake problem, or
5	W	Surface water with no filtration, or
4	W	Surface water with no filtration, or
5	W	Surface water with no treatment, or
4	W	Surface water with no treatment, or
2	W	System leakage that causes operations problems, or
2	W	Tank rehabilitation that requires more than normal maintenance associated with painting, or
3	W	Treatment facility at full capacity (24 hrs/day) to meet gpcd domestic use for community facilities, or
2	W	Treatment units daily operating period exceeds current design standard; e.g., operating 20 hours/day, design standard 12 hours/day with applicable per capita consumption design standard, or
4	W	Unprotected spring or well (open spring, open well), or
1	W	Updating as-builts, or
3	W	Utility authority water haul program with on-site storage and plumbing (feasible project for piped water), or
3	W	Water distribution system leakage that exceeds 15 percent of the design flow for the entire system, or
5	W	Water does not meet all MCL's at the tap for primary contaminants set by EPA, or
4	W	Water does not meet all MCL's at the tap for primary contaminants set by EPA, or
2	W	Water does not meet secondary drinking water standards, or
3	W	Water main breaks, water treatment facilities inoperable, or system without water for more than 4 times/yr caused by improper design, construction, or deteriorating pipe, or
2	W	Water main size does not meet current standards and is causing operational problems, or
2	W	Water meters needed and requested, or
3	W	Water pressure less than 10psi, 25% of the time or daily during peak use periods, or
2	W	Water source does not meet current design standard; e.g., one well current design standard, 2 wells needed for community water system (additional water source economically feasible), or
4	W	Water source providing less than 30 gpcd for more than 20 days per year, or
2	W	Water source without automatic controls causing operational problems, or
2	W	Water storage facility for fill and draw system does not meet design standard for current use, or
3	W	Water storage on a fill and draw system provides less than 2/3 of applicable design standard for gpcd storage for user population during non-fill period, or
4	W	Water storage on a fill-and-draw system provides less than 1/3 of applicable gpcd design standard for community for period when filling is not possible, or
3	W	Water storage tank leakage not associated with piping connections, fittings, controls, etc, or
2	W	Water system component that is causing continuing routine operating problems and requires replacement (excessive maintenance required).
2	W	Water system components that do not meet current Area design standards. Water use and flows for determining system component deficiencies are based on current Area gpcd domestic use criteria. Excessive water use does not create deficiencies, or
2	W	Water treatment does not provide water meeting secondary drinking water standards, or
2	W	Water treatment plant exceeds design life, has numerous operating problems, and requires replacement for efficient, effective operation, or
3	W	Water treatment that does not comply with surface water treatment rule but meets MCLs, or

DL	SF	Deficiency
4	W	Watering point, or washeteria (improved facilities feasible), or
2	W	Watering point, washeteria, or water haul system with no feasible improved facilities project, or
2	W	Watering point, water haul system, or washeteria with no feasible improved facilities project.
2	W	Well construction or spring development problems, or
2	W	Well located in a floodplain causing operational problems, or
5	W	Well source incapable of providing drinking water that complies with regulations for microbial pathogens, or
3	SW	Contamination of groundwater or surface water by solid waste disposal site, or
2	SW	Current landfill site will be at capacity within 4 years requiring new site, or
3	SW	Disposal site in non-compliance with regulations due to major inadequacies in facilities or equipment, or
1	SW	Equipment repairs, or
2	SW	Existing off-reservation non-tribal landfill closing within 4 years requiring transfer station or disposal site on reservation, or
2	SW	Facilities - collection and disposal facilities nearing capacity which require expansion, or
2	SW	Facilities or studies related to hauling off-site, or
2	SW	Facilities without adequate equipment or equipment does not meet current standards, or
1	SW	Fence repairs, or
2	SW	Improperly operated site because of lack of adequate equipment, or
2	SW	Inadequate collection equipment, or
2	SW	Inadequate collection system storage facilities, or
2	SW	Inadequate on-site storage of wastes, or
2	SW	Inadequate storage facilities at site for site maintenance equipment, or
1	SW	Indian-owned homes have access to municipal solid waste landfill but do not to use it.
3	SW	Landfill does not meet site location criteria, or
3	SW	Landfill with unrestricted access; i.e., no fence, or
1	SW	Maintenance on transfer stations.
2	SW	Old dump site not properly closed with restricted access, or
3	SW	Open dump; i.e., site does not meet EPA regulations for municipal solid waste landfill, or
1	SW	Painting facilities, repairing fences, repairing equipment, replacing minor pieces of equipment, or
1	SW	Painting needs, or
1	SW	Repairs to on-site buildings, or
3	SW	Scattered open dumping with no collection, transfer station or disposal site reasonably available and development of a solid waste management program for the Area is feasible and workable, or
2	SW	Site improvements needed to meet current design standards.
3	SW	Solid waste management program never had adequate equipment to properly operate site.
2	SW	Transfer station needs (note a project to construct a transfer station is a DL2 project unless an existing DL3 disposal site is properly closed or use of the disposal site is terminated by restricting access or other means), or
2	S	Abandoned on-site wastewater facilities not properly closed, or
3	S	An unusual situation where deteriorated facilities not correctable by routine maintenance will cause failure of any sewer system component within 4 years and create a DL4 condition, or

DL	SF	Deficiency
3	S	Cesspools or similar type facilities used for waste disposal, or
2	S	Cleanouts needed on force main, or
3	S	Community drainfield with surfacing sewage effluent located more than 500 feet from occupied homes, or
3	S	Contamination of groundwater due to deficient treatment facility; e.g., percolation from sewage lagoons into groundwater prior to adequate treatment, or
4	S	Deteriorated facilities or facility components not correctable by routine maintenance which will create DL4 conditions within 2 years; e.g., stream erosion of lagoon dike will cause failure and discharge of raw sewage, or
2	S	Deteriorated sewage lift stations causing operational problems, or
2	S	Deteriorated sewage treatment collection or disposal facilities not correctable by routine maintenance, or
3	S	Deteriorated sewage treatment plant component not correctable by routine maintenance will fail within 4 years and create DL4 conditions, or
2	S	Deteriorated sewage treatment plant components not correctable by routine maintenance causing operational problems, or
2	S	Deteriorated sewer mains which are causing operational problems, or
3	S	Dike seepage where seepage creates a continuous flow of sewage effluent in a defined channel, or
4	S	Documented ground water (drinking water aquifer) contamination by septic tank systems, or
3	S	Documented ground water contamination by septic tank systems (not drinking water aquifer), or
1	S	Drainage control, or
2	S	Exfiltration that exceeds 5% of design flow, or
2	S	Facilities have potential for creating problems; e.g., replace septic tanks with community sewage facilities when there is high probability of future ground water contamination due to septic tank density, or
2	S	Facilities that cause infrequent problems related to public health concerns; e.g., infiltration, exfiltration, etc., or
2	S	Facilities that do not meet current design standards including reserve system capacity, or
2	S	Facility deficiencies such as lack of accurate as-builts or equipment operating guidance, or
3	S	Frequent sewer overflows due to inadequate system main sizes, or
4	S	Honey-bucket haul systems (individual or community), or
2	S	Inadequate sewer system as-builts, or
2	S	Infiltration that exceeds 10% of design flow, or
1	S	Items such as painting facilities, replacing standby pumps, equipment repair, or
2	S	Lagoon dike erosion, or
2	S	Lagoon dike seepage, or
1	S	Lagoon fencing repairs, or
2	S	Lagoon liner repair, or
2	S	Lagoon organic loading exceeds standards, or
3	S	Lagoon seepage at least 10 times current applicable standard in primary or secondary cell with ground water less than 50 feet below surface, or
1	S	Lift station painting, or
1	S	Manhole repairs, or
3	S	More than three sewer main breaks per year caused by improper design, construction, or deteriorating pipes, or
2	S	No available site for septage (waste pumped out of septic tanks) disposal, or
4	S	No piped wastewater (exception--utility authority sewage hauling program with on-site storage and plumbing), or
4	S	No piped wastewater in home (privies), or

DL	SF	Deficiency
5	S	No piped wastewater in home, or
5	S	No sewage treatment facility. (Septic tank, or community sewage system has a discharge without treatment.), or
4	S	No sewage treatment facility. (Septic tank, or community sewage system has a discharge without treatment.), or
2	S	Ocean outfall problems, or
2	S	Old, unused sewage treatment facilities not properly abandoned, or
3	S	Overflowing lagoon without discharge permits (total retention design) more than 10% of time, or
4	S	Piped greywater only, or
3	S	Primary lagoon cell does not hold any liquid, or
3	S	Progressive lagoon dike erosion not correctable by routine maintenance will cause dike failure within 3 years, or
1	S	Repair to controls.
1	S	Repair to standby equipment, or
1	S	Repairs to backup equipment, or
1	S	Repairs to individual systems, or
4	S	Routine raw sewage discharge to environment
2	S	Safety hazards to utility personnel associated with sewage lift stations, treatment plants etc, or
3	S	Seepage pits for graywater without settling tanks, or
2	S	Septic systems which do not meet current design standards: a. high ground water; b. inadequate separation from water sources; c. small sites with no replacement alternative; d. structural damage to tank or subsurface disposal system, or
5	S	Septic tank effluent surfacing from failed drainfield on individual site, or
3	S	Sewage lift station overflows--resulting from design, construction, or deteriorating facilities--more than 3 times per year, or
3	S	Sewage surfacing from drainfields at individual sites, or
4	S	Sewage surfacing from failed drainfield on individual site, or
2	S	Sewage treatment and collection facilities that do not meet current design standards based on current flows, or
5	S	Sewage treatment facility failure creating health hazard in residential area; e.g., effluent surfacing from community drainfield accessible to residents, sewage discharge to a dry stream bed accessible to residents.
4	S	Sewage treatment facility failure creating health hazard in residential area; e.g., sewage surfacing from community drainfield is accessible to residents, sewage discharge to a dry stream bed accessible to residents, or
3	S	Sewage treatment plant at capacity with current flow, or
3	S	Sewage treatment plant not complying with discharge permit because of inadequate facilities 10% of time, or
1	S	Sewage treatment plant painting, or
4	S	Sewer backup into homes caused by construction design or deteriorating facilities at least 2 times per year, or
4	S	Sewer backups into homes caused by high groundwater in absorption system (every year occurrence), or
3	S	Sewer main construction, design, or root problems which cause plugging with overflows more than 3 times per year.
2	S	Sewer main root or construction problems which cause backups and/or overflows, or
3	S	Sewer overflows due to inadequate main sizes which occur more than 3 times per year, or
2	S	Sewer service line root or construction problems, or
3	S	Sewer system exfiltration which exceeds 10% of system design flow (may be greater deficiency if causing contamination of drinking water aquifer, etc.), or

DL	SF	Deficiency
3	S	Sewer system infiltration which exceeds 20% of the system design flow (sewer mains, wet-wells, manholes, service lines etc.). Continuous or at least 10 occurrences per year, or
2	S	Sewer systems including lift stations and force mains with overflow problems, or
2	S	Single cell lagoon with operational problems, or
3	S	Sludge disposal facilities required to comply with new regulation, or
2	S	Standby and emergency power needs, or
3	S	System incapable of complying with sewage discharge permit. (Facility related, not O&M), or
2	S	Tree and weed growth in bottom of lagoon because of facility deficiencies, or
4	S	Unrestricted access to partially treated sewage discharge to environment within 500 feet of occupied homes; e.g., a. Overflowing wastewater lagoons, b. Sewage surfacing from community drainfield.
2	S	Utility authority sewage hauling program with on-site storage and plumbing and no feasible piped sewer system.
3	S	Utility authority sewage hauling program with on-site storage/plumbing and feasible piped sewage system, or
2	S	Utility sewage haul systems with household plumbing and on-site storage (piped sewage not feasible), or
3	S	Utility sewage haul systems with household plumbing connected to a storage tank and piped sewage feasible, or
3	S	Violations of discharge permit because of inadequate facilities more than 10% of the time, or
4	S	Wastewater surfacing on individual home site continuously or minimum 20 days/year, or
1	S	Weed control in lagoon dikes, or