Inspection Reminder Pilot for Proprietary On-site Sewage Systems - Technical Memorandum

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1. Current Requirement

Routine inspection and maintenance of on-site sewage systems (OSS) is critical to ensure proper operation, protect public health, and extend the service life of OSS components.

Washington State Department of Health (DOH) requirements for proprietary treatment products (PTPs) establish minimum standards for product registration, operation, maintenance, and ongoing performance. Manufacturers must provide detailed operation and maintenance information, including service procedures and maintenance schedules for system components.

The DOH Department Standards and Guidance (DS&G) for PTPs outlines manufacturer and service-related obligations for these products including:

- **4.2 Limited Warranty –** Requires that the manufacturer warrant all components of the products from defects in material and workmanship for a minimum of two years.
- **4.7.1 Initial 2-Year Service Policy –** Requires an initial service policy be included in the purchase price and provide for four inspection/service visits over the two-year period. These inspections, specific only to the PTP, are distinct from the routine inspection requirements outlined in WAC 246-272A-0270; and in some cases, may be completed in tandem with routine inspections if authorized by the manufacturer.
- **4.7.3 Extended Service Policy –** Requires that the manufacturer must make available, for purchase by the owner, an extended service policy with terms comparable to those of the initial service policy which includes services for the entire system, not just the proprietary treatment product.

Initial inspections provide an important opportunity to identify operational concerns, confirm proper system performance, and address component issues while manufacturer warranty coverage is active.

Applicable regulatory and guidance references include:

- **WAC 246-272A-0110 – Proprietary treatment products –** Eligibility for registration: Establishes requirements for proprietary treatment product registration, including demonstration of product performance and compliance with DOH requirements.
- **WAC 246-272A-0120 – Proprietary treatment product registration –** Process and requirements: Requires manufacturers to provide technical information, including detailed descriptions of routine service and system maintenance events.
- **WAC 246-272A-0270 & BOH 13.60.005– Operation, monitoring, and maintenance** – Outline minimum inspection requirements and frequency.
- **DOH DS&G for Proprietary On-Site Wastewater Treatment Products, Section 4.2** – Limited Warranty
- **DOH DS&G Proprietary On-Site Wastewater Treatment Products, Section 4.7** – Service-Related Obligations
- **BOH 13.52.040 Aerobic Treatment Units (ATUs)** – Requires that ATUs be operated and maintained in accordance with DOH Proprietary Treatment Products guidance.

2. Pilot Implementation

Beginning in 2027, PHSKC will launch an inspection reminder pilot for newly installed proprietary treatment systems.

Under this pilot, property owners will receive notifications during the first two years following installation reminding them when their required inspections are approaching. These reminders will help owners understand that these inspections are a required component of their proprietary system purchase and are intended to catch issues before they can develop into a system failure.

The pilot is initially focused on PTP systems as higher-risk OSS due to their reliance on specialized mechanical, electrical, and treatment components that require ongoing monitoring, inspection, and maintenance to ensure proper operation. The proprietary products themselves are covered by the manufacturer's warranty for at least the first two years, and the inspection and maintenance services specific to the PTP are included as part of the product purchase. The frequency of the manufacturers' product inspections in the first two years is consistent with the routine system inspections required by BOH Title 13. In some cases, these inspections may be completed at the same time depending on the specific manufacturer's inspection requirements and maintainer qualifications. Given the complexity of these systems, routine inspections are essential to verify continued performance in accordance with the manufacturer's specifications and to help property owners maintain compliance with applicable warranty requirements.

The pilot is intended solely as an educational and outreach effort and does not establish new inspection requirements or a new enforcement mechanism. PHSKC will not take enforcement action solely because a property owner does not respond to a pilot reminder. Existing inspection requirements and compliance processes will remain unchanged.

Inspection reports submitted during the pilot will continue to be handled under existing PHSKC procedures. If a submitted inspection report identifies an uncorrected deficiency, the deficiency will be addressed through the existing follow-up and compliance processes applicable to the system and may result in delayed applications pending correction of the deficiencies. The pilot is not intended to alter how deficiencies are evaluated or create an additional enforcement pathway.

3. Reason for Change

Property owners may be unaware that the inspection and maintenance services required during the initial two-year period may coincide with the 2-year service policy included with the purchase of their PTP, and they may be unaware of the manufacturer's warranty. As a result, property owners may not recognize when an inspection is due or understand why their maintenance provider is contacting them, which can create confusion and contribute to missed inspections, deferred maintenance, reduced system performance, and noncompliance with applicable inspection or warranty requirements.

County-certified maintenance providers have identified this communication gap as an ongoing challenge in their interactions with property owners. Industry feedback, including concerns identified through previous outreach and industry surveys, has highlighted the difficulty of scheduling required inspections when property owners do not receive a direct reminder from the local health jurisdiction. The Inspection Reminder Pilot responds to this longstanding request by providing property owners with a direct notification from Public Health when their inspections are coming due.

The Inspection Reminder Pilot provides an opportunity for additional education and outreach to property owners while reinforcing existing DOH requirements applicable to PTP manufacturers, installers, and certified maintenance providers. By increasing awareness of the inspection and maintenance services required during the initial warranty period, PHSKC seeks to improve compliance with required inspection schedules, support continued system performance in accordance with manufacturer specifications, and encourage property owners to take an active role in the long-term operation and maintenance of their OSS beyond the initial service period.

4. Anticipated Impact

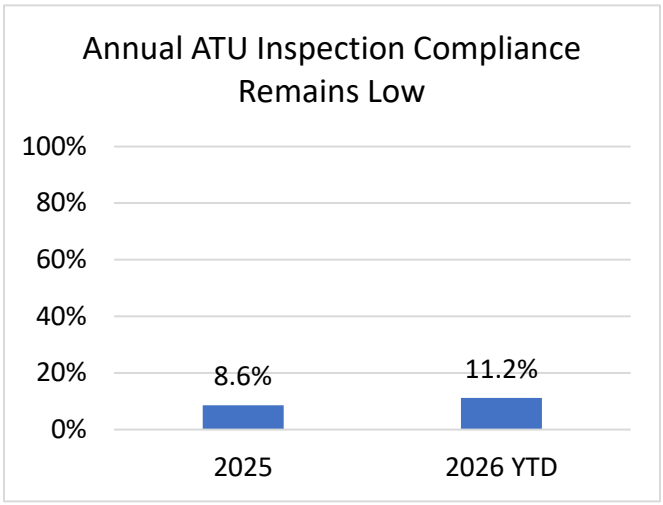
- Increase awareness among property owners regarding their inspection obligations, the initial service policy, and warranty included with their PTP purchase.
- Improve completion rates for the required first two years of PTP system inspections.
- Increase identification of system issues during the manufacturer-required warranty period, allowing repairs or component replacements to be completed when covered under the manufacturer's warranty.
- Encourage property owners to take a more active role in understanding, maintaining, and protecting the long-term performance of their OSS.
- Support stronger working relationships between property owners and certified maintenance providers by helping owners understand the importance of routine inspections and establishing ongoing maintenance practices.

5. Outstanding Questions

- Are any other considerations/requirements needed to ensure that property owners and certified professionals are supported in implementing this?
- How can PHSKC continue to support installers, maintainers, and property owners in understanding proprietary system inspection requirements? What educational avenues would be beneficial?
- Are additional outreach materials needed to assist professionals in communicating initial service policy and warranty requirements during the sales and installation process?
- What additional opportunities exist to educate about the benefits of maintenance and encourage continued inspection compliance after the initial two-year service period?

6. Technical Evaluation and Additional Information

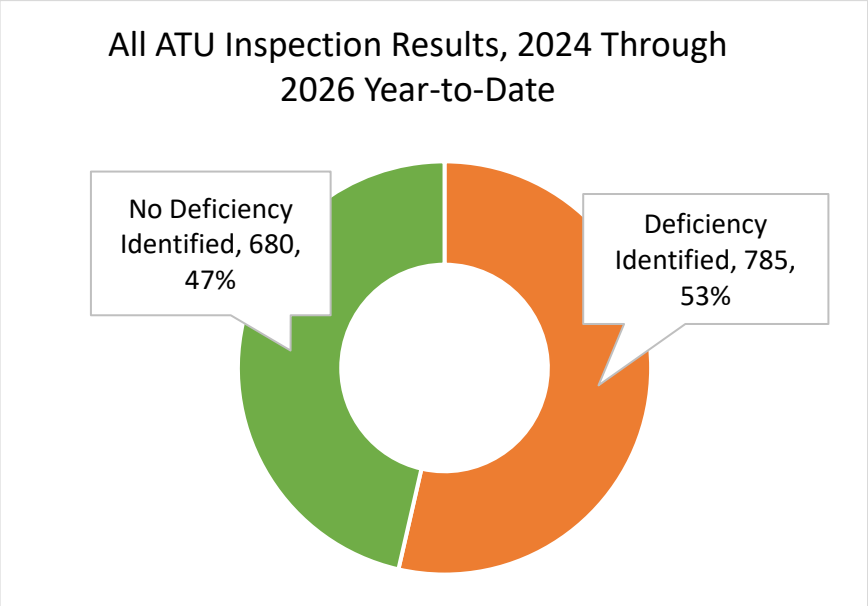
King County has approximately 4,000 proprietary on-site sewage systems. These systems include treatment technologies that require ongoing operation, maintenance, and monitoring to ensure continued treatment performance. Proprietary systems are subject to regular inspection requirements, including at least annual inspections after the initial service period.



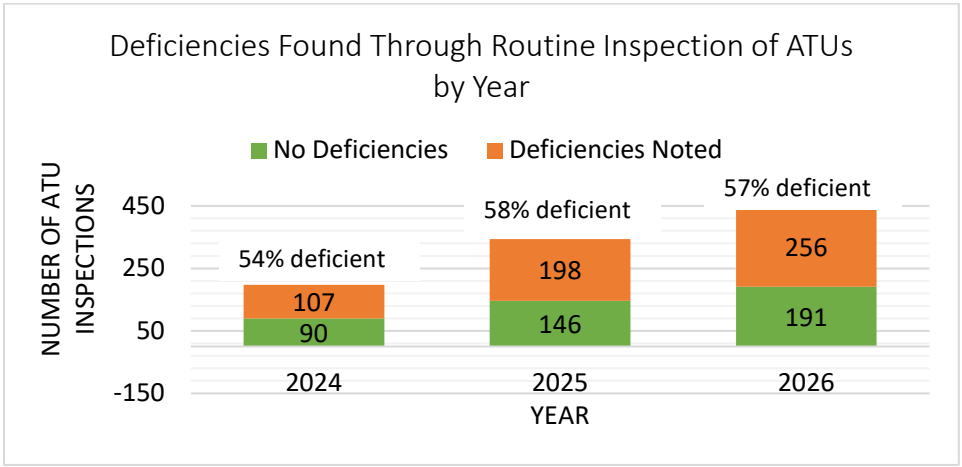
Despite these requirements, inspection compliance remains low. This means that a substantial portion of the approximately 4,000 proprietary systems in King County may not receive the regular inspection and maintenance necessary to identify operational or maintenance deficiencies. In 2025, there were 344

advanced treatment unit (ATU) system inspections reported, for a compliance rate of **8.6%** across the county. 2026 year-to-date data shows a moderate increase in inspection compliance at **11.2%**, while these numbers are not a direct comparison of proprietary system inspection rates, ATUs represent the largest contributor to the total number of proprietary systems installed.

Inspection data from 2024 through 2026 demonstrates the importance of ensuring that required inspections occur. During this period, 1,465 inspections of proprietary systems – including routine inspections, Time of Sale inspections, complaint inspections, and other inspection types – were completed. Deficiencies were identified during 785 of these inspections, or **53%**.



Of all ATU inspections in 2024-2026 YTD, the subset of routine inspections provide the most relevant comparison for evaluating the importance of the Inspection Reminder Pilot because they represent regularly scheduled inspections intended to evaluate system operation and identify deficiencies. Of the 988 routine ATU inspections completed between 2024 and 2026-to-date, 561, or **57%**, identified one or more deficiencies. The percentage of routine inspections identifying deficiencies remained consistently high throughout the period reviewed, with deficiencies identified during **54%** of routine inspections in 2024, **58%** in 2025, and **57%** in 2026.



These findings demonstrate that regular inspections are an important mechanism for identifying deficiencies that may otherwise go unnoticed. The data does not establish whether individual deficiencies would have resulted in system failure or other consequences without inspection; however, it demonstrates that deficiencies are frequently identified when proprietary systems are evaluated. When required inspections are missed, the opportunity to identify and address those deficiencies is also missed.

The combination of low inspection compliance and the high rate of deficiencies identified during completed inspections supports an increased focus on owner education and inspection reminders. The Inspection Reminder Pilot is intended to address a gap between existing inspection requirements and property owner awareness of those requirements, particularly during the initial two-year service period.

7. Looking Ahead

The estimated cost of implementing the pilot includes staff time to develop and maintain the reminder process, prepare educational materials, identify eligible systems, and monitor program effectiveness. Initial implementation is supported through Puget Sound Partnership funding. During the pilot period, PHSKC will evaluate staff workload, program costs, reminder effectiveness, and whether the reminders improve timely completion of required inspections.

If the pilot demonstrates value, PHSKC will evaluate options for sustaining the reminder process using existing program resources and systems. The long-term approach will seek to minimize ongoing costs and staff workload by incorporating reminders into established workflows and using existing permitting and inspection data and automated notification capabilities where feasible. Continuation of the program will be dependent on available resources and the results of the pilot evaluation.

Given the approximately 4,000 proprietary systems requiring ongoing inspection, the low rate of inspection compliance, and the finding that deficiencies were identified in more than half of routine inspections reviewed, an educational reminder program provides a targeted approach to improving awareness of existing inspection requirements and supporting the early identification of system deficiencies.

WA DOH DS&G for Proprietary On-Site Wastewater Treatment Products provides the following general guidance:

Table 3.
Relationship Between Site Limitations and System Complexity for Conventional and Alternative On-Site Sewage Treatment Systems

Issue	Characteristics / Level of Limitation and Complexity		
	Lower ← ← ← ← ← ← ← → → → → → → → **Higher**		
Site Limitation	Meets state rules for *conventional gravity system*	Meets state rules for *conventional pressure distribution system*	**Limitation increases with -** *less* vertical separation, smaller lot sizes, less horizontal separation, and, *greater* surface slope, wastewater flow, wastewater strength, etc.
System Complexity	Gravity-flow (no pumps, controls, etc.)	Pressurized distribution (requires pumps & controls)	**Complexity increases with -** *increasing* reliance upon, or combinations of: pumps; blowers; motors; mechanical, electronic, or computer-operated controls & warning devices; disinfection (materials & equipment); reduction in drainfield size; quality control of artificial (non-original soil) treatment media, etc.

Table 4.
Suggested Monitoring Frequency Based Upon Site Limitations and System Complexity for Conventional and Alternative On-Site Sewage Treatment Systems

	Level			
Site Limitation	Low	Low	High	High
System Complexity	Low	High	Low	High
Monitoring Frequency	***Low = Annually***	***Medium = Semi-annually***		***High = Quarterly, or greater***