

Clarification of OSSF Requirements for Occupied Structures in Relation to Recreational Vehicles

Background: The Galveston County Health Districts OSSF Policy requires that “Any single family dwelling ... or any other structure occupied any part of the day or night shall be connected to an on-site sewage facility or other approved method of wastewater treatment and disposal.” There is some question on whether or not an RV should be considered a structure under this policy.

One dictionary definition of a structure is “something composed of parts.” Clearly an RV is composed of “parts”. The interpreted intent of the policy, however, is based on what types of things we see people use as homes or businesses. People have been found living or working in “normal” constructed homes, beached barges, dry docked sailboats, shipping containers and RV’s. The policy is designed to identify those structures that are likely to generate wastewater and have that wastewater efficiently and properly disposed of. The two disposal methods most commonly used are the OSSF or public sewer connection. The use of holding tanks, are by regulation, considered to be a solution of last choice when no other option is available. (see Title 30 T.A.C. Chapter 285.34(e)).

Other Jurisdiction RV Requirements

Fort Bend County: They essentially have the same policy that Galveston County does. RV’s are required to be connected to an OSSF or public sewer system. The RV’s are identified when electrical service is requested as we do in Galveston County.

Harris County: Whenever an electrical meter is requested for an RV it must be shown that an OSSF or public sewer connection is available.

TCEQ: TCEQ does not require an RV connected to electricity to have an OSSF permit. They did understand that our approved OSSF policy does require a sewer connection for RV’s and they have absolutely no problems with the policy.

Conclusion

The policy of the Galveston County Health District to require that RV’s asking for water and electrical connections on private property be connected to an approved OSSF or public sewage disposal system, seems within the norms of other large local OSSF programs and has been approved by the TCEQ as part of the Galveston County OSSF Policy.