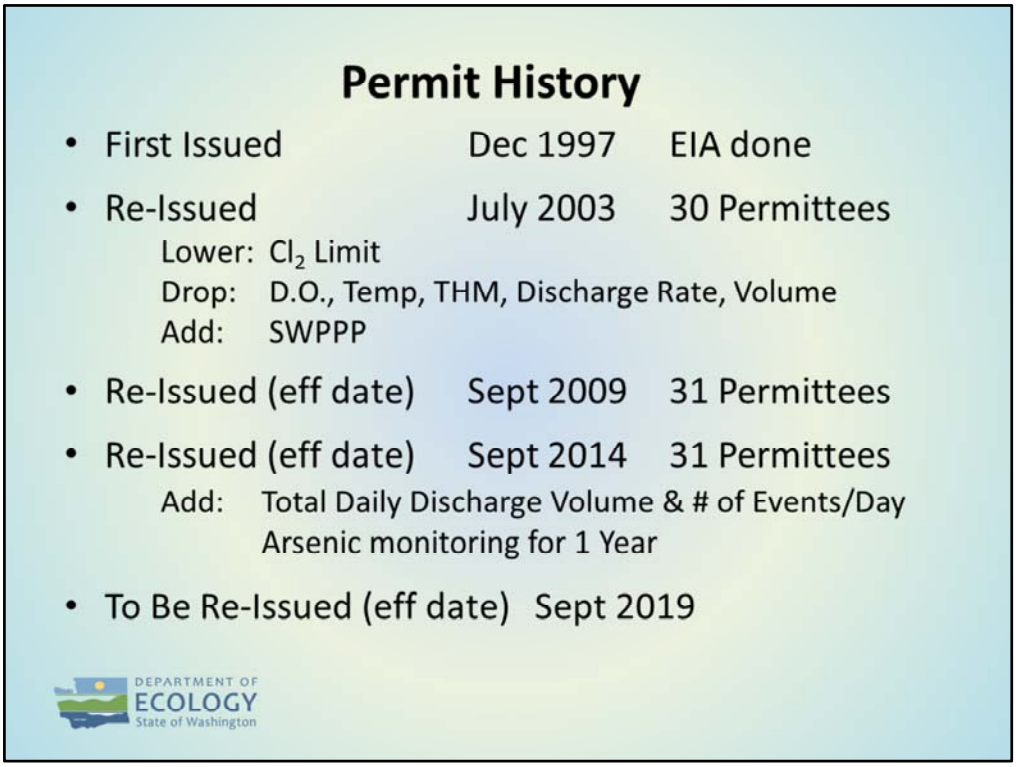
Purpose of meeting:

Workshop: Review what this permit is and why we're talking about it.
Summarize two of Ecology's data review efforts in past few years.
Summarize near-term Ecology intentions.

Listening Session: ECY Hear from the public, including Permittees

* What's working?
* What's not working?
* Whatever suggestions you have



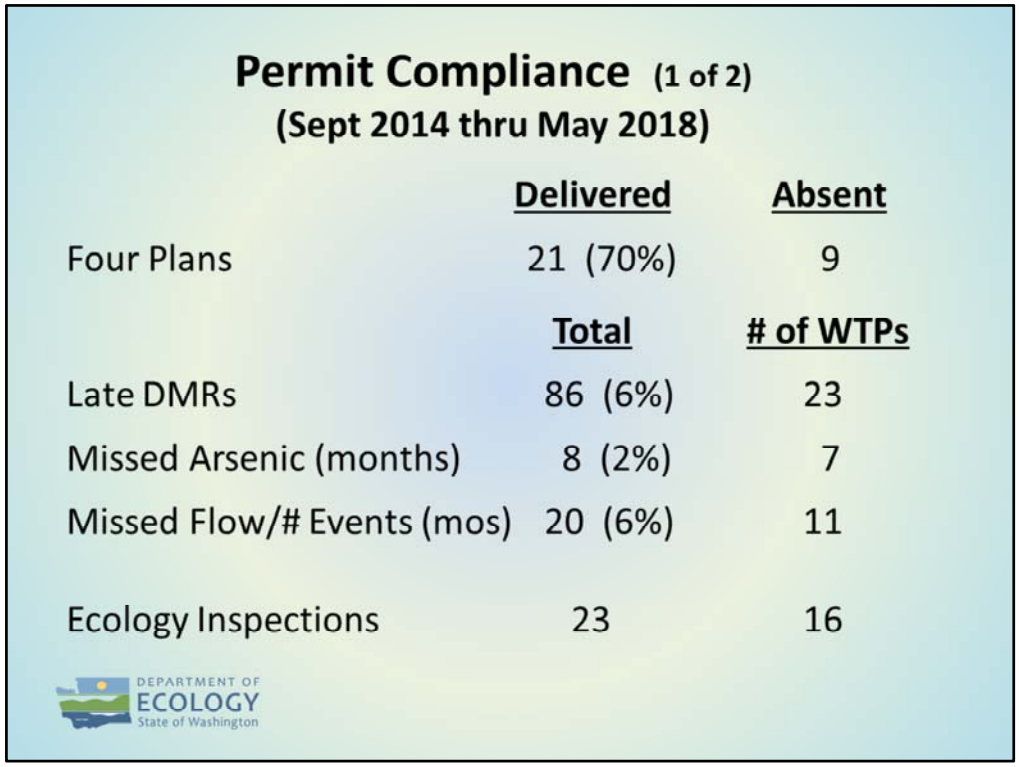
1. N-P-D-E-S- set up by USEPA
   WA State opted to comply with it & implement its provisions,
   including: require people who discharge poll to waters of the US to get permit
   Were 3 options: Individual, Group, or General
   Early 1990s, ECY opted to provide a GP for the DW production industry
   So WTPGP is now required for certain large WTPs. Permits have a 5-year term.
   So every 5 years, we look at it, update, it, revise it, and reissue it
   based on new law and regs, court cases, new tech, new scientific data
   re environment in general & industry-specific monitoring results

2. EIA = Economic Impact Analysis

3 "Number of permittees" are as of the end of the permit cycle.
   So far, all have been public utilities. (so no EIA required)
   2003 Permit provided a 2-year compliance period for lower Cl_2 limit.

4. Current permit had new req't for ongoing reporting of WW discharge volumes,
   and, for 1 year only (9/2016 – 8/2017) T&D Arsenic in treated backwash effluent.

5. Continue to require monitoring settleable solids, pH, chlorine, turbidity,
   tot daily discharge volumes, & tot daily # of discharge events.



1. For 30 Permittees: Percentages of what we expected for full compliance.

2. What's your preference?
    a. Submit up-to-date plans electronically. (bullets below)
    b. Complete a new on-line form.

3. Those %s look really good, but for As & Flow data,
    Data for 21% of the months were reported late or not at all.

- Operations & Maintenance Plan
- Solid Waste Control Plan
- Stormwater Pollution Prevention Plan
- Other Spill Contingency Plan

Permit Compliance (2 of 2)
(Sept 2014 thru May 2018)

	Missed		Exceeded Limit	
	Total	# of WTPs	Total	# of WTPs
Tot Res Cl_2	18	5	17	10
pH	6	3	5	3
Sett Solids	9	5	7	5
Turbidity	7	4	NA	NA

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This slide summarizes the totals for:

missed reporting of monitoring, and exceedances of discharge limits.

These numbers show that:

For the four routine monitoring parameters, that you've been testing for years,

Permittees failed to meet the required limit or did not report anything for only 2% of the expected results.

"Arsenic Assessment" (1 of 2)

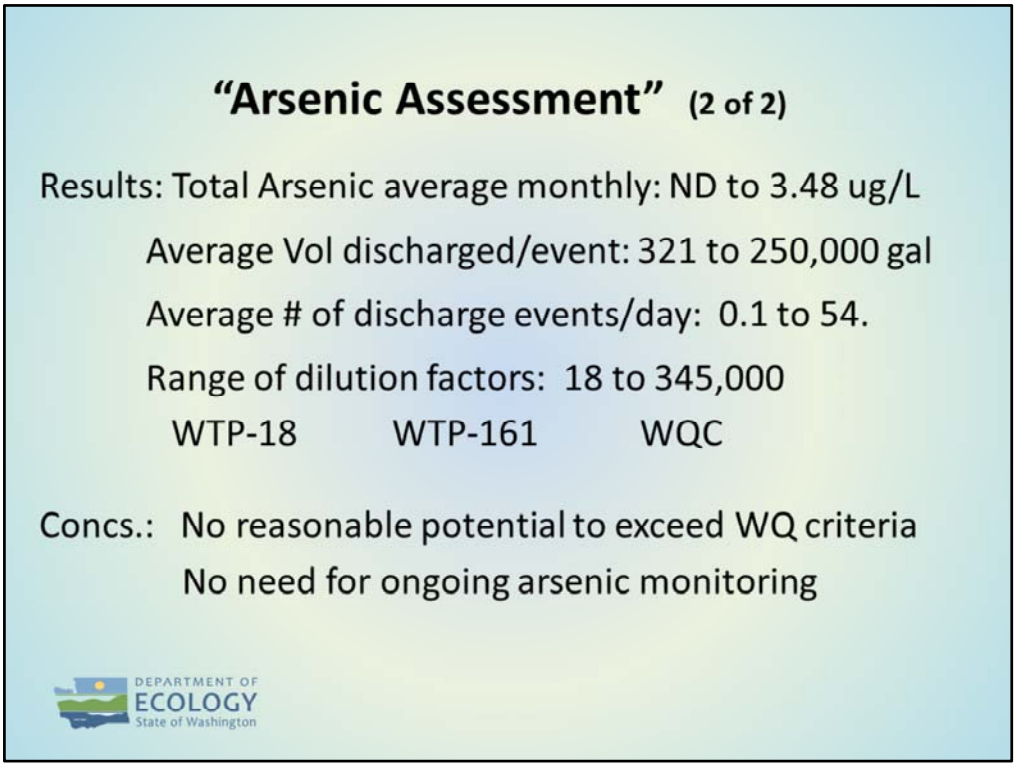
Why? Arsenic in filter backwash from several WTPs

Purpose: Collect sufficient data to support decisions:

- Need for new Limits.
- Need for additional monitoring
- Need for focus on specific WT processes

Actions: Required permittees to provide more data:

- T&D Arsenic monthly Sept 2016 thru Aug 2017
- Daily volume, # of discharges, Sept 2015 forward



1. "average" = all results for a given facility.

2. Based on available Receiving Water flows and discharge volumes, . . .

3. More dilution → Smaller [ ] → More protective of WQ

4. All the calculated DFs were greater than the lowest DF protective of WQ, in this case the . . .

   DF for Chronic WQC = 26 EXCEPT for one WTP:

   WTP-18. However, all arsenic [ ]s = ND
   WTP-161 (next largest). 95th %ile As = 0.60 ug/L
   [As]/DF = 0.004 ug/L (<WQC of 0.018 ug/L)

"WTP Re-Evaluation" (1 of 2)

Why? 11 Years since last review of facts & assumptions

- Population increased; # of permitted WTPs ~constant
- Arsenic in filter backwash from several WTPs

Purpose: Compare discharges of GP WTPs with the others to validate old assumptions (Volume & Concentration).

Actions:

- Obtained data from Dept of Health. **(904 other WTPs)**
- Calculate the approximate rate of discharge of treated filter backwash wastewater for each WTP.

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"WTP Re-Evaluation" (2 of 2)

Results:

- 162 WTPs probably discharged to surface water.
  (~80 may need WTP GP, unless otherwise permitted)
- 268 WTPs probably discharged to ground.
  Since 1997: # of WTPs with >100 Conns that did: ↑ 5X.
  Volume discharged to ground ↑ up to 11X.
- 474 WTPs discharged to location unknown.

C & R:
- More WTPs discharged larger volumes to ground than we assumed 11 years ago.
  → Permittees provide info; Ecology assesses impact.
- ~45 Additional WTPs may need WTP GP coverage.
  → Ecology will contact them directly.

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Ecology's Intent for Sept 2019 General Permit

- Stay the course.
- Complete survey questions by 8/30/2020.
  - May eliminate need to submit complete planning documents.
  - Ensure Ecology has best up-to-date info for assessing potential impact of WT industry on environment (e.g., groundwater).
- Expand upon or Add new permit conditions to address:
  - Proper cleaning to avoid short-circuits.
  - Proper handling of settling pond solids.
- Use most up-to-date language for self-reporting, monitoring, general conditions, Tribal & Federal lands.

Ecology's Intent for after Sept 1, 2019

- Improve our re-evaluation of risk from WTPs to waters of the State. Consider:
  - Site geography.
  - Physical details of settling ponds and infiltration areas.
  - Raw water sources, %age blends, and temporal variations.
  - Treatment details to better inform nature of wastewater.
  - Any readily available chemistry data held by WTPs for Fe, Mn, Cl, and TDS in raw, finished, and wastewater.
  - Retrieval and disposal methods for accumulated solids.
- Identify any "missing" WTPs that have no coverage, but should.

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Plan for Re-Issuance

7/10/2018	Workshop & Listening Session
Early Sept 2018	Send reminder letters to Permittees
2/28/2019	Notice of Intent Due Date
Mid-Feb 2019	Issue Draft Permit: 41-day comment period
3/26/2019	Workshop & Public Hearing
Mid-July 2019	Issue Final Permit & Responses to Comments 30-day appeal period
Sept 1, 2019	Effective Date of Revised Permit

Questions regarding this info?

Listening Session: What has worked during the past 5 years?
What needs improvement?