

**Comments provided to the Wastewater Treatment Workgroup (WWTWG)
regarding the 2017 Midpoint Assessment**
(08-24-2012 version, as submitted to WQGIT)

General

- Need to account for actual trading of loads (whether permanent or for a set period/temporary) vs. offsets (similar to TOWG comments) – and this applies to WWTPs not just others seeking trading opportunities
- Need to reconcile WIPs/stormwater permit ‘progress’ with how such progress is accounted for in terms of TMDL ‘progress’
- Need to account for groundwater and other ‘lag time’ when assessing load reduction progress (vs. implementation progress)
- Need to establish some sort of ‘de minimus’ load level so that ‘feeding the WSM’ is not the driver for collecting all data
- **Need to demonstrate actual progress through monitored load data, especially for a range of practices over a large enough land area to be detectable (vs. BMP by BMP accounting approach)**
- Need to prioritize reduction efforts in defined watersheds to demonstrate progress and confirm that reductions can be achieved/wide-spread practices do achieve results – to get buy-in/support
- Need to acknowledge realistic timeframes for getting suite of practices actually accomplished (vs. politically driven goals)
- Need to acknowledge time and money links, and broader environmental implications (benefits and impacts) of making certain policy choices

Wastewater

- Methodologies used in developing Annual Point Source progress runs:
 1. Wet weather impact on modeling Point Source Annual Nutrient Reduction Progress
 2. Inconsistency in evaluating Point and Non-point Source progress
- Nutrient loads from Minor Industrial Point Sources
- Changes to Point Source WLA due to permanent trades such as Septic Connections
- Accounting for changes in WLA and Offsets both permanent and annual
- Nutrient loads from industrial plants with river uptakes
 1. Reporting the net contribution
 2. Defining no-net-contribution dischargers
 3. The negative net contribution issue

Septics

- Use of local septic information to improve Bay model - Reconciling local and Bay Program data
- Identifying load from commercial and residential systems

- Accounting for offsets -Septic upgrades/connections
- Affordability issues associated with onsite/septic upgrades for nutrient removal and potential funding sources; hearing more concerns as we move forward in the process.
- Some comments on septic systems recently supplied to EPA through another channel for the Sector Growth Demonstration. These comments are in regards to how the expected load is calculated to demonstrate that a sector is flat or increasing:
 1. The last 20 census years are 2000 and 2010; in those years data was not collected on septic systems as it had previously been done. Therefore, looking back over the last 20 years of census data in 10-year increments would not provide the relevant data.
 2. Any projections should include commercial as well as residential systems.
 3. Virginia has data on the actual number of septic construction permits issued for the last eight years. Using this actual data instead of an estimate from census would give a much more accurate accounting of the number of new systems anticipated. The period of record for construction permits covers both an economic boom and bust period so an average of construction permits issued over that time frame would give a realistic estimate of projected growth through 2025.
 4. BMPs are being developed for the onsite sector that will allow credit for nutrient reduction from various system configurations. When those BMPs are finalized and applied, a more accurate load accounting for new growth can be obtained.