



## SUMMARY

### Wastewater Treatment Workgroup (WWTWG)

#### Conference Call

Tuesday, January 14<sup>th</sup>, 2014, 10:00 AM- 12:15 PM

[www.chesapeakebay.net/calendar/event/21145/](http://www.chesapeakebay.net/calendar/event/21145/)

### Welcome and Introduction

- Tanya Spano (Metropolitan Washington Council of Governments; WWTWG Chair) convened the call and reviewed the day's [agenda](#).
- Jeremy Hanson (Chesapeake Research Consortium) verified participants on the call. He directed participants' attention to the December WWTWG minutes ([Attachment A](#)) and asked for any comments or corrections. None were raised; the minutes were accepted as submitted.
  - **DECISION:** The December WWTWG minutes were approved as submitted.

### BMP Verification

- Hanson reviewed comments received from WWTWG members on the revised wastewater verification guidance ([Attachment B](#)).
- Ning Zhou (Virginia Tech; WWTWG Coordinator) asked for clarification on a comment to Attachment B from Allan Brockenbrough. Will smaller facilities have a nutrient limit?
  - Allan Brockenbrough (VA DEQ): New and expanding facilities under a given flow are required to offset any new load but are not considered "significant" facilities. They are not significant but they will have technology based nutrient limits with NPDES permit.
- Marya Levelev (MDE): Maryland already includes nutrient limits for expanding or upgrading non-significant facilities.
  - Zhou: Perhaps we need to create a category to deal with this kind of facility. If they have a permit with DMR data, we could include them in annual progress reports.
    - Levelev: we have a number of minors that we are required to monitor. We already submit these with DMR data in the progress runs.
    - Zhou: We do not have a clear list.
  - Spano: how much of this is to meet BMP verification need, versus what is needed for the database?
    - Zhou: They are related. If they report the data, then we need a clear list like we have for significant facilities so we know how many facilities have the DMR data.
  - Levelev: not sure what else is needed, if we say we are going through DMR.
  - Spano: Without a list Zhou cannot distinguish between default and DMR data.
    - Spano noted this was separate from the BMP verification effort. She asked Zhou and Levelev to follow up offline to make sure they are on the same page about the data.

- Following discussion the following language was added to the section on non-significant facilities: “Maryland and Virginia NPDES permits for new, expanding and certain upgraded non-significant facilities include nutrient wasteload allocations and DMR reporting requirements.”
- Levelev suggested changing the language in the left hand column of Tables 1, 2, and 4. Hanson noted the terms were leftover from previous versions of the table and agreed to make it more descriptive.
- Hanson noted there were no suggested changes to the CSOs section.
- Hanson directed participants’ attention to the on-site systems section.
- Dave Schepens (DE DNREC) reiterated some of Delaware’s comments that some technologies such as elevated sand mounds and shallow-placed pressure dosed systems would not need annual inspections. Delaware has decades of experience with these systems and they function very well. Any system is placed according to the site conditions. Homeowner money would be better spent on fixing failing systems rather than annual inspections. Whenever a home is sold, the on-site system is inspected.
- Spano: We can qualify that it is fine if the majority of verification is done by states or counties, but a qualified third party would still meet the expectations.
  - Schepens noted that a certified design professional would risk losing their license if they did not do the inspection truthfully, so they are reliable.
  - Spano: Our charge is to document that there is documentation, and processes, in place for this verification process.
- Joyce Hudson (EPA): The “should” in the first bullet implies that it is optional, which is the comment Maryland made.
  - Spano: Yes, that is my take as well. Verification needs to occur, either directly or by state or local, or certified professionals.
- Schepens noted the preceding paragraph states that “specific requirements will be based on existing state regulations or will follow the below set of minimum elements for verification based on existing state programs.” So the language in the bullet points would not really change anything for the three states with existing regulations.
- Spano: Seems that Delaware’s program is robust enough and they believe they are on top of it to ensure these systems are verified. Credit is definitely due to Delaware for their effort. Question to other states, if they can fund it would annual inspections make a difference or would it be the way to go? Does anyone agree with the annual recommendation?
  - Schepens: We consider elevated sand mounds and shallow-placed pressure dosed systems as conventional because they have been around longer. So the science, technology, and understanding are better. Anything with a pump is basically an advanced system unlike a conventional, standard gravity system.
  - Spano: It makes sense if Delaware sees a distinction between the older technologies and the newer, more advanced ones.
  - Eric Aschenbach (VDH): the majority of these technologies for Virginia fall under our alternative system onsite regulations, which require annual inspections anyway.
    - Levelev believed that is the case for Maryland as well, though Jay Prager (MDE) would know for sure.

- Schepens: For the two technologies, could say that inspections may be required by certain states. Do not want to see annual inspections as a requirement. Took us four years to get the amended regulations in place. A requirement of service contracts for advanced treatment units was a big hurdle in the regulations.
- No further questions or comments were raised.
- Spano noted the WWTWG needs a completed package by the end of the month, in about two and a half weeks. If CBPO staff sent an updated draft out by the end of the week (January 17<sup>th</sup>), could WWTWG members review it and submit final comments by the 21<sup>st</sup> to the 24<sup>th</sup>? She noted the 20<sup>th</sup> is a holiday.
- Eric Aschenbach (VDH) felt it could be done, but would be a little tight. Virginia also has holiday on the 17<sup>th</sup>.
- Spano asked for comments no later than January 27<sup>th</sup>. That would give CBPO staff the 28<sup>th</sup>-31<sup>st</sup> to finalize and submit the document to the BMP Verification Committee and BMP Verification Review Panel.
- **ACTION:** CBPO staff will distribute an updated version of the verification guidance by COB January 17<sup>th</sup>. WWTWG members will provide final comments on the verification document no later than January 27<sup>th</sup> to Tanya ([tspano@mwecog.org](mailto:tspano@mwecog.org)), Ning ([zhou.ning@epa.gov](mailto:zhou.ning@epa.gov)) and Jeremy ([jhanson@chesapeakebay.net](mailto:jhanson@chesapeakebay.net)). The final draft will be submitted to the BMP Verification Committee and BMP Verification Review Panel by Monday, February 3<sup>rd</sup>.

#### **Discussion of old and new supplemental indicators**

- Zhou and Hanson summarized discussion from the WQGIT's January 13<sup>th</sup> conference call. During the WQGIT call it was explained that Maryland will host the new supplemental indicator on a Maryland website (e.g., BayStat) and the Bay Program will link to it from chesapeakebay.net.
- Spano asked for any concerns about the approach that was outlined to the WQGIT, i.e. hosting the supplemental indicator on a Maryland webpage, with links from the Bay Program website.
  - No objections were raised.
- Spano asked for members' thoughts on the old supplemental indicator. She asked each member to express their preference to keep it or drop it.
  - Brockenbrough: Virginia votes to drop it.
  - Levelev: Maryland also supports getting rid of it.
- Hanson pointed out that some environmental groups like the Chesapeake Bay Foundation liked the data presented by the old supplemental indicator, although that data may be available elsewhere.
- Zhou noted the information for the old supplemental indicator is available online through the EPA ISIS database. As Brockenbrough said, there are some problems with the old supplemental indicator and it does not tell the whole story. The environmental groups may like having the indicator, but it takes some time to explain the old supplemental indicator.
- Schepens: Delaware is also fine with dropping the old supplemental indicator.
- Brockenbrough: More accurate assessment can be made through the actual loads. The old supplemental indicator counts beans and ignores actual loads.

- Spano: May be best for workgroup to say the workgroup believes the more appropriate and representative indicator of progress is the actual loads.
- Zhou: The permit data does not track actual progress, just the permit.
- Dave Montali (WV DEP): For West Virginia it is important to communicate the progress and the number of facilities meeting their wasteload allocations. A few years down the road that will be the critical issue because loads are going to go up.
- Spano: We may need to revisit the indicator issue in the future. Though the loads may go up in the future, but it is not a loss in progress. It is reasonable to acknowledge that we will need to tackle it as a communication issue.
- Montali: would frame it as a way to track compliance status of significant facilities. Compliance with permit limits that result from individual wasteload allocations.
- Levelev: Agree with Spano that we consider this later. Ties into other issues such as two-year milestones.
- Spano summarized the discussion and noted that the workgroup can revisit the issue down the road and perhaps consider alternative supplemental indicators to address the communication issue.
- Zhou mentioned that as we get closer to 2025 we will want to track the number of significant facilities in compliance with permit status.
- Spano noted the WWTWG will want to view at the BayStat and CBP website before it goes live.

#### **Biosolids and Spray Irrigation data template**

- Zhou explained that no feedback was received on the template ([Attachment C, opens in .xlsx format](#)) since the last workgroup call. Though there might be comments once we start trying to fill it in. Next step is to pilot it and see how it works with actual data.
- Brockenbrough: will have to check with land application folks. We cannot distinguish between phosphate and organic phosphorus. Only have total phosphorus.
  - Zhou: we can figure out a default or work around on that.
- Montali: what about when data is available on a dry weight basis? Would zero percent moisture work in this context?
- Spano: a lot of assumptions are made in the template. There is definitely a lot of variability. We're still in exploratory stage. Want to keep that context in mind.
- Montali: Plan to roll out the template to the permit staff in West Virginia, which will bring up any questions and highlight any difficulties. We might be able to get certain pieces of information, but we will see what problems arise as we get more specific.
- Zhou: for biosolids, is there any way to convert existing data into this template?
- Brockenbrough: We had not picked up on distinction between wet and dry weight. The number will vary greatly, by source and county. Once we get into the details, it will be a pretty big spreadsheet.
- Spano: For next call, explore level of effort to convert the existing data.
  - Brockenbrough: Will talk to staff and see what effort would be required to fill this out for the next year.
- Montali: if we learn more about what Virginia has provided and can provide, we can discuss if the other states would be able to provide similar data.

- Spano noted Attachment C is definitely a wishlist at this point. See if we can get any differentiation from the modelers about the parameters. Which ones are most critical, and which are linked. E.g. if we can't provide moisture content, what they would like to see instead, etc. This will help the workgroup sort out everything. If we cannot get all the data, it will help to know our options.
- Zhou asked about the spray irrigation sheet in the template.
- Schepens noted that spray irrigation is handled by another office in DNREC.
- Brockenbrough: We don't have spray irrigation in a database for VA. Probably not an exercise we could do annually, but could maybe make the effort one time if it is warranted.
- Montali: Very little data in West Virginia. There is a significant facility that eventually plans to use spray irrigation.
- Aschenbach: We do track some spray irrigation from small facilities. We have some databases for new facilities.
- Spano asked Zhou to produce a table to summarize what data is available. This would help assess the effort to see if it could be a one time effort or periodic effort. Not committing to making this annual at this point. Zhou noted the template was based on an informal survey of the states. Can do some additional research.
- Zhou encouraged members to look at the template. Want to know if it works for the states or if there are any data gaps.
- Spano: if the data exists, want to know if it is in database form or if it would require more effort.

#### **Other updates**

- Spano: During next call, would like to revisit the Midpoint Assessment priorities. Should also key up any other issues we should look at. Personally, think reuse is something we should talk about. Important issue to consider going forward. She asked WWTWG members to consider any other potential priorities, e.g. climate change. ACTION.
- Zhou noted that STAC sent out its RFP for new workshops in the next fiscal year. If there are any ideas from WWTWG members, we can submit a proposal by the February 14<sup>th</sup> deadline.
- Montali: What's the status on the attenuation panel?
  - Zhou: we currently have TMDL contract support from Tetra Tech. Virginia Tech will undertake bulk of expert panel work going forward. The next attenuation panel may go under the Virginia Tech contract, but that remains to be determined.
- Zhou: We had a very good STAC workshop last month hosted at the National Association of Homebuilders (NAHB). Glynn Rountree (NAHB) is working on the report right now. Should be able to present the report in the coming months.
- Zhou noted MDE will be changing its permit requirements for orthophosphate. They currently require significant facilities to monitor weekly, and want to reduce this to once per month. MDE asked Zhou how other states handle this. Zhou explained Virginia only monitors TP, though they have good historic data to figure out the phosphate. Maryland's approach is still the most complicated. Still requires one monitoring per month, instead of weekly.
- Spano asked for an update on the on-site wastewater treatment systems expert panel.

- Zhou: The panel is revisiting the issue of inspection frequency, hoping to finalize report this month.

### **Teleconference participants**

<b><u>Name</u></b>		<b><u>Affiliation</u></b>
Tanya	Spano (Chair)	Metropolitan Washington Council of Governments
Ning	Zhou (Coord.)	Virginia Tech, CBPO
Jeremy	Hanson (Staff)	CRC, CBPO
Eric	Aschenbach	Virginia Dept. of Health
Allan	Brockenbrough	Virginia Dept. of Environmental Quality
Greg	Busch	MDE
Marcia	Degen	Virginia Dept. of Health
Joyce	Hudson	EPA
Marya	Levelev	MDE
Dharmendra	Kumar	Pennsylvania Department of Environmental Protection
Dave	Montali	WV DEP
Glynn	Rountree	NAHB
Dave	Schepens	DE DNREC