



## WWTWG

### DRAFT Meeting Minutes

#### Wastewater Treatment Workgroup (WWTWG) Teleconference

Tuesday, November 7, 2017, 10:00 AM – 12:00 PM

Conference Line: 866-299-3188

Participant Code: 267-985-6222

Adobe Connect: <http://epawebconferencing.acms.com/wwtwg/>

Calendar: [https://www.chesapeakebay.net/what/event/wastewater treatment workgroup conference call november 2017](https://www.chesapeakebay.net/what/event/wastewater_treatment_workgroup_conference_call_november_2017)

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### Summary of Actions and Decisions

**Decision:** The WWTWG approved the September meeting minutes.

**Action:** Tanya Spano will work with CBP staff to make changes to the No Action and E3 scenario definitions. The updated table will be sent to the WWTWG for comments and suggestions within a week in order to present a draft updated scenario definition to the WQGIT on November 13.

**Action:** Michelle Williams will send out a poll for rescheduling the upcoming meetings in December and January. The December call may be canceled or rescheduled, and old business will be revisited at the January 2018 conference call.

### Welcome, Introductions, and Announcements —Tanya Spano (Chair)

**Decision:** The WWTWG approved the September meeting minutes.

### Modeling Decision Rules for Point Source Scenarios—Tanya Spano (Chair)

Ms. Spano shared information about Blue Plains' draft permit loading assumptions and its relationship to the District's WIP that came up during the CBP's recent review of preliminary modeling results with District DOEE and DC Water staff. Based on that situation, there appears to be a need to confirm the modeling scenario decision rules that the WWTWG previously recommended and that the WQGIT agreed to (see meeting material); and to discuss what decision rules apply when there are changes in wastewater plant capacity and/or loads that need to be addressed in these modeling scenarios.

**Action Requested:** The WWTWG will be asked to provide clarifications and/or a recommendation regarding the modeling scenario decision rules for point sources that will be used for the Phase 6 suite of modeling tools. An update and/or recommendation regarding these matters will be presented at the November 13 WQGIT conference call.

### *Discussion:*

- Tanya Spano: The issue came up about how to address Blue Plains' flows given that they are a Combined System plant. Their CSO long term control plan includes requirements to reduce CSOs by increasing the amount of captured stormwater that they treat. They have requested in their draft permit to increase the 370 mgd rated design capacity by an additional 14 mgd, which effectively re-rates the plant. They proposed to increase their design capacity but to commit to operating at a lower concentration in order to maintain the same TMDL load allocation. So,

while their capacity has increased their total load has not. And while a data error found during these discussions will be corrected, it was also clear that the decision rules regarding plant capacity issues for these modeling scenarios also needed to be clarified.

- Spano: The text in red were the edits to the scenarios definition that were previously approved by the WWTWG and the WQGIT. The draft E3 definition changed for nonsignificant plants and septs. We refined those aspects. Now we are looking at clarifying these definitions for the Phase 6 scenarios.
- Mohsin Siddique: We are discussing flow though, is this the rule that was adopted for flow? Why is 2006 the year that was noted there?
  - Spano: We needed to change this table to make clear that this is for significant plants. This table needs to be refined to make that clearer.
- Spano: We have two tasks here. We need to clean up the table and clarify what we meant, and we need to assess the decision rules that apply to Blue Plains and any other plants where capacity may change. For the 2010 No Action and E3 scenarios, the footnote captures the decision we made, where we agreed to use design flow for significant plants. That was based on 2010 flows being consistent with the Bay TMDL. That way, everything in the TMDL was documented for us. When Blue Plains changed its design capacity, we wondered how that should change the scenario rules. I think the approach here is to base 2010 scenarios off the same design capacity as in 2010, and that way any new expansions are captured in the WIP. That allows us to not grandfather in growth that happens after 2010 and lets us deal with these changes in explicitly in the WIPs
- Allan Brockenbrough: I still don't know why this is an issue. This table was a guide for No Action and E3, where does the TDML end up for Blue Plains?
  - Spano: The TMDL is load based —but the WSM scenarios require a concentration and a flow.
  - Siddique: We have a load that we can still meet even with higher flows. My concern is how/where we document these changes.
  - Brockenbrough: E3 completely eliminated CSO loads and added CSO loads under the WLA for Blue Plains.
  - Spano: Agree that E3 is defined as e CSO flows and the associated loads being eliminated by 100%. What we are dealing with because of Blue Plains' CSO long-term control plan though, is that in addition to their 98% reduction of CSOs requirement, that they also have to 'capture' an additional 14 mgd of stormwater flow and treat that load at the plant – without exceeding their current load cap.
- Brockenbrough: We were working on this in VA. We had allocations for the direct CSO loads in VA. We also have allocations for dry weather flow from WWTPs and we have high flow loads directly from the plants under CSO conditions.
  - Spano: What's different about DC is that that's what goes out with full treatment. It's as though they had expanded the service area and grown as a plant. The plant now has a larger capacity and how that's reflected in the model is what we need to decide. We should have said that in the table and not short -handed it with what we have in there now.
  - Siddique: We need to record our actual flow for the Watershed Model. That's what we're really doing here. What is the result of doing it in the WIP and not the planning target documentation?
  - Spano: Our baseline is grounded in the 2010 TMDL year. Changes are captured in the WIP. In DC, additional capacity has to be captured in the WIP for additional load and concentration and be offset somehow.

- Rashid Ahmed: What is the definition of design flow here?
  - Spano: Most plants, it's whatever is defined in the permit – but for the 2010 No Action scenario, that would be what was in the permit in 2010.
  - Siddique: our new permit is 384 mgd, not 370 mgd.
- Spano: Allan, do you agree with my interpretation?
  - Brockenbrough: Yes, that it's based on that level of technology and design flow at the time the TMDL was written.
- Spano: I will make some changes to this table and send it out to the group for review. We will have more facilities in the future that want to expand, and we have to decide how to address that increase in load. There are a few ways that can be done, and those changes have to be captured going forward. We don't want to reopen No Action and E3 inappropriately. E3 is a planning level scenario, not what you actually are choosing to do with your facilities.
- Brockenbrough: The need to offset additional load is a need of every TMDL, so I still don't know why it's up for discussion.
- Spano: This table is unclear so we need to clarify that definition and improve the documentation to clarify our intent there.
- Katherine Antos: If we are making this adjustment and edits to these rules, what will those edits look like?
  - Tanya: The next iteration would be to drop the middle column, change the red to black and change the No Action and E3 consistent for design flow.
- Antos: Do we want a consistent decision rule—what about the 2006 data? Should that also be changed to 2010 for nonsignificant plants as well?
- Brockenbrough: In VA it's the load associated with the plant in 2005.
- Kumar: We use the same in PA, 2005 flow.
  - Jeff Sweeney: 2005-2006 is the flow. But what do you do when new nonsignificant facilities were added to the database after that? What do we do with those new ones that we are adding? The decision here is to decide what to use when you don't know. We have to use the best data that we have.
  - Spano: The current documentation is the best estimate that can be substantiated.
  - Sweeney: There is a default for nonsignificant flows if you don't know what it is. If you know what it is for 2005-2006, then you use that.
- Marya Levelev: We have a combo of flows that were used to estimate load flows for minor plants. I don't know how that would translate to the 2005-2006 flows for minor plants. We used a different method for those flows. That's what we did in the Phase III WIP.
  - Sweeney: Leave that for the WIP II. What do you do for the Phase III WIP when you get new plants online?
  - Levelev: We will have to use design flow and estimate concentrations for them. There's a couple variables there.
- Spano: If something is new since 2010 then that has to be accounted for in the WIP. If a plant exceeds its capacity, new treatment levels, plants expand, new plants come online, we need to account for that in the WIP and that should offset those loads. If we find something that's not accounted for, then we have to decide how to fit into the WIP to be consistent.
- Sweeney: This is about what we use in the No Action and E3. This is all about what we use in those scenarios so that we can calculate planning targets. If we get a new facility, we will use whatever info you give us for the E3 and No Action. We just need that information to be consistent across scenarios. If you use current flow in those new facilities, we will take that current flow you have and include it that way in creating these scenarios.

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- Spano: We will send out an edited version to the WWTWG for review, and we will present to the WQGIT as an update to the decision rules and not a substantial change to decision rules. We will have to document this in the footnotes as well.
- Antos: The other clarification should be that for nonsignificant facilities there can't be newly submitted in the data after 2010 that is included in the No Action and E3, but it would be included in the WIPs. There can't be a double standard for sigs to be locked in 2010 but allowed to add more nonsignificant facilities to the scenarios as they come along.
- Kumar (in chat): DEP intends to continue addressing CSOs through its CSO Policy (DEP ID No. 385-2000-011), Including the Nine Minimum Controls (NMCs), Long-Term Control Plans (LTCPs) and Post-Construction Monitoring. DEP does not intend to impose monitoring or Cap Loads in NPDES permits for CSOs.
- Tanya Spano called for consensus on the proposed changes to the table. No objections were heard.

**Action:** Tanya Spano will work with CBP staff to make changes to the No Action and E3 scenario definitions. The updated table will be sent to the WWTWG for comments and suggestions within a week in order to present a draft updated scenario definition to the WQGIT on November 13.

### Adjourned

#### **Next conference call:**

Our regularly scheduled time of December 5, 2017 conflicts with a 2-day WQGIT meeting. The WWTWG will propose a date and time to reschedule the December WWTWG call.

Our regular conference call for January 2, 2018 will also be rescheduled. The WWTWG will discuss a new date and time for the January 2018 WWTWG call.

**Action:** Michelle Williams will send out a poll for rescheduling the upcoming meetings in December and January. The December call may be canceled or rescheduled, and old business will be revisited at the January 2018 conference call.

#### Participants:

Tanya Spano, MWCOG  
Sucharith Ravi, UMCES  
Jeff Sweeney, EPA CBPO  
Michelle Williams, CRC  
Katherine Antos, DOEE  
Rashid Ahmed, NYS DEC  
Dharmendra Kumar, PA DEP  
Matt Richardson, VA DEQ  
Megan Browning, WV DEP  
Dianne McNally, EPA R3  
Mark Smith, EPA R3  
Elaine Wilson, DC Water  
Nasser Ameen, MWCOG  
Mohsin Siddique, DC Water  
Lana Sindler, MWCOG  
Will Hunley, HRSD

## WWTWG Conference Call, November 7, 2017

Allan Brockenbrough, VA DEQ  
Marya Levelev, MDE