

**Wastewater Treatment Workgroup (WWTWG):
Background on Midpoint Assessment Priorities**
Revised to reflect comments from 10-02-2012 conference call

Comments about the WWTWG's plans to supplement the priority items are provided in red italicized font.

Wastewater Plants:

1. Determine how permanent or annual trades/offsets are, or should be, accounted for when reporting annual progress or evaluating WLAs and how trade/offsets will affect WLAs.
The WWTWG concludes there is a need for cross-workgroup collaboration and discussion on this issue, involving the TOWG, and perhaps the WTWG or BMP Verification Committee too. This issue also ties into other priority items, e.g. 3(b) under "septics" below, as offsets from septic connections may appear as negative progress for WWTPs. The WWTWG feels that it is important to make a distinction between measuring progress and determining compliance.
2. Determine how to improve nutrient loading data from Non-Significant Facilities, especially the Non-Significant Industrial Facilities.
The WWTWG is working to better understand how the different states manage and monitor non-significant facilities.
3. Agree on methodologies to reflect expected variability in point source loads when reporting on progress:
 - a. To account for the expected variability due to wet weather impacts – to be consistent with how non-point source progress is characterized; and
 - b. To ensure that increases in loads attributable to growth that are under the load caps is expected/acceptable and is not mistaken for lack or a decline in progress.
4. Standardize the methods used to calculate the net loads from industrial plants with river uptakes and defining the no-net-contribution dischargers.
The WWTWG is currently gathering information on how each jurisdiction defines and calculates these loads; the workgroup plans to discuss the issue over coming months.
5. Evaluate how biosolids that are land-applied are accounted for – to ensure that net loads are accounted for, and to ensure consistency with how other nutrient load ag practices are accounted for (e.g., manure, chemical fertilizers). [Point raised in BMP Verification process]
The WWTWG needs a better understanding of how biosolids are tracked in jurisdictions other than Virginia, which is the only jurisdiction that reports the information to the CBP. The WWTWG will coordinate with the AgWG and CBPO staff.

On-site/Septics:

1. Determine how to best to use local septic information to improve Bay model estimates to:
 - a. Better reconcile local and Bay Program data; and

- b. Assess how this information can be used to improve how loads are estimated in growth projections.
- 2. Develop methods for identifying/quantifying loads from commercial and residential systems.
- 3. Agree on methods to account for reduced septic loads due to:
 - a. Septic system/BMP upgrades;
 - b. Connections to sewer systems; and
 - c. Determine how to address affordability issues associated with onsite/septic upgrades for nutrient removal - and identify potential funding sources; recognizing the increased concerns as we move forward in the process.