



## CALL SUMMARY

### Wastewater Treatment Workgroup (WWTWG) Teleconference

Tuesday, November 6, 2018, 10:00 AM – 12:00 PM

Calendar Page: [Link](#)

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#### Summary of Actions and Decisions:

**Decision:** WWTWG approval of the October 2018 meeting minutes, pending edits from Ed Dunne, DOEE

**Action:** The WWTWG will receive the comment responses with the final revisions to the Boat Pump-Out BMP Expert Panel Report in early 2019 for review, comment, and edit. Following WWTWG approval, the revised report and appendices will be presented to the WQGIT for final approval on the proposed boat pump-out revised practice as an official BMP.

**Action:** Ed Dunne and Michelle Williams will follow up with MD and WV representatives for approval of the proposed schedule adjustment to keep monthly WWTWG conference calls with a liberal cancellation policy when applicable.

**Action:** WWTWG members interested in the November 14 point source data application demo should contact Megan Thyng ( [thyng.megan@epa.gov](mailto:thyng.megan@epa.gov) ) for details.

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10:00 AM     **Welcome, Introductions, and Announcements** — Ed Dunne (Chair)

**Decision:** WWTWG approval of the October 2018 meeting minutes, pending edits from Ed Dunne, DOEE

10:10 AM     **Update on Comments on Boat Pump-Out BMP Draft Expert Panel Report** – Lew Linker, EPA CBPO

The Chesapeake Bay Boat Pump Out BMP Expert Review Panel was requested by the WWTWG and convened in February 2016. The panel developed the baseline load estimates for the recreational boating nutrient load into the Maryland and Virginia portions of the Chesapeake Bay and provided recommendations on related BMP crediting and verification. The workgroup tentatively approved the report and recommendations.

The WQGIT charged the WWTWG to reconsider elements of the proposed BMP for applicability to type III commercial vessels in No-Discharge Zones. The WWTWG will review

the comments received on the draft expert panel report and discuss responses to comments.

Based on the WQGIT comments received, the proposed path forward includes treatment and discharge in no-discharge zones only, with only type I and II marine sanitation devices (MSDs). Lynnhaven was used as an example of a no-discharge-zone geographical limitation. Lew reviewed different types of discharge and treatment options for type I and II MSDs for context on what practices might be credited. Now that all comments have received a response, Lew will be rewriting the Expert Panel report in early 2019. The response to comments will be added to the Appendix I and the whole report, with appendices, will be distributed for the WWTWG to review in the first quarter of 2019.

Comments on the report included:

- Comment: How can you take a credit when discharges are illegal? (for type III MSD, the type that needs to hold their waste and pump out at the WWTP) Similar case to SSOs and illicit discharges—you can't credit something that should already be taken care of.
  - Response: For this reason, we are limiting to type II and I discharges in no-discharge zones. This load would be considered part of the load allocation (LA) rather than the wasteload allocation (WLA), so treated as a nonpoint source
- Comment: Need to address the uncertainty of the assumptions that went into the calculations of the type III MSD practices. This load is also really small in the grand scheme of all the loads in the Chesapeake.
  - Response: Yes, this is a small load, and only locally significant. The assumptions and calculations will change when adjusting the practice for type I and II MSDs rather than type III MSDs.

**Action Requested:** Workgroup initial discussion. By COB November 20, workgroup members are asked to send any follow up questions and comments, including options for paths forward, to Michelle Williams ([williams.michelle@epa.gov](mailto:williams.michelle@epa.gov)) and Ed Dunne ([ed.dunne@dc.gov](mailto:ed.dunne@dc.gov)).

Attachment 2. Draft Boat Pump-Out Report

Attachment 3. Boat Pump-Out Compiled Comments with draft responses

### *Discussion*

- Allen Brockenbrough: I also think the loads are very small in the scheme of things, and I wonder how we can credit this under the MS4.
  - Lew Linker: I don't think this would count under the MS4 since it would be a nonpoint source load that we are addressing.
  - Brockenbrough: So that's a credit for a reduction available to the state, but an MS4 can't claim that as a reduction?
  - Linker: The WQGIT decided against allowing this as a wastewater load available to MS4 jurisdictions, but the practice would be part of the load allocation. That discussion is documented under the WQGIT [August 13 meeting minutes](#).
- Ed Dunne asked about resources available for revising the report.

- Linker: There is no coordinator for the WWTWG, and the TetraTech contract is expired, so we are running on very limited resources to address these comments and revise the report. I have taken on the report revisions, but won't be able to complete that until early 2019.
- Dunne: So you are not asking the WWTWG now for review; that will be in early 2019 when the report is revised.
- Linker: Correct. That would be edit and review by the WWTWG on the way to a final decision by the WQGIT in 2019. The WQGIT will make the final decision. If WQGIT approves, it will move forward as an approved BMP; if WQGIT does not approve, then that's the end of the proposed practice.
- Mohsin Siddique: Do you have an estimate for percent of the pump-out actually delivered to the WWTP in the area?
  - Linker: No, we didn't estimate that, but I would estimate that a large percentage of the boat loads would be delivered to the plant for treatment. Other than that, there aren't a lot of options to treat this super high concentrated waste, so I'd guess that 95% of that boat pump-out waste ends up at a treatment plant.

**Action:** The WWTWG will receive the comment responses with the final revisions to the Boat Pump-Out BMP Expert Panel Report in early 2019 for review, comment and edit. Following WWTWG approval, the revised report and appendices will be presented to the WQGIT for final approval on the proposed boat pump-out revised practice as an official BMP.

## 10:20 AM      Update on Jurisdictional Programs

Updates from any jurisdictions on wastewater sector. Discuss WWTWG role in assisting jurisdictions with any planning and implementation challenges or opportunities.

### *Discussion*

- Brockenbrough: We have had a large effort to review non-significant facilities—sampling, data collection, and upgrades for non-significant municipal and industrial facilities. We are doing some ground truthing to assess whether the calculations in the TMDL are accurate. On the whole, we are finding that they are accurate, but some are over-allocated and some are under-allocated. We'd hope that this information could be used if the TMDL is ever amended in the future.
- Ed Dunne asked for more detail on the discrepancies found.
  - Brockenbrough: We used a lot of default values for TN and TP and flow concentrations, and we did not account for more modern, updated facilities and equipment that often have lower flows and higher nutrient concentrations.
- Will Hunley: What does that mean for updating the input deck for the WIPs?
  - Brockenbrough: We found some discrepancies. We can provide another input deck for our progress runs, but since the TMDL is not being changed, we can't adjust the WLA based on the ground-truthing we have been doing.

- George Onyullo: I'm not sure that those discrepancies are large enough to justify amending the TMDL. I wonder if we can just go after that programmatically and through holistic implementation, rather than ask to amend the TMDL.
- Brockenbrough: Yes, but technology and conditions have changed so much since 2010 when the TMDL was written that I can't see how the TMDL won't change to address the new conditions.
- NY has no comments on jurisdictional programs at this time.
- PA has no comments on WIP development, but PA has achieved ensuring that all significant facilities in PA are under their cap loads.
  - Ed Dunne asked about general issues with WW in PA. Maria asked to follow up with colleagues before discussing on the call.

#### 10:35 AM **WWTWG Schedule for 2019**

Due to reductions in CBPO staff and coordinating capacity, the WWTWG is asked to consider changing the work group's monthly call schedule. What schedule would work for jurisdictions? Every other month, quarterly, or some other frequency? A suggested 2019 WWTWG quarterly schedule includes the following meeting dates: February 5, May 7, August 6, and November 5. Using this schedule, the WWTWG call for December would not occur.

**Decision Requested:** WWTWG approval of change to the 2019 meeting schedule.

#### *Discussion:*

- Brockenbrough: We think that sometimes things are very busy. I have no problem leaving it monthly, with a liberal cancellation policy. There's no need to move the schedule, but we also don't have to fill meeting time just for meetings.
- Rashid Ahmed is fine with once a month.
- George Onyullo: I'd be ok with monthly and ability to cancel when necessary
- PA is also fine with monthly calls and liberal cancellation policy.
- Dunne: The understanding is that we can have a monthly policy with a liberal cancellation policy. Since MD and WV are not on the call today (state offices closed for election day), we will follow up with them with this proposal before the next call.

**Action:** Ed Dunne and Michelle Williams will follow up with MD and WV representatives for approval of the proposed schedule adjustment to keep monthly WWTWG conference calls with a liberal cancellation policy when applicable.

#### 10:45 **Update on 2018 Point Source Progress Data**—Megan Thyng, EPA CBPO

Megan will review the 2018 Wastewater progress data submission deadline on December 3 and use of the new point source data application.

There will be a point source application demo on November 14. Megan is focusing on changes made to the app since the last update. WWTWG members should contact Megan if they are interested in the demo.

*Discussion:*

- Megan Thyng: We have been going state by state due to each state's unique needs, and VA is last on the list for that demo.
- Dunne: I am finding the application very user friendly. It's very easy to input information, and thank you for all your hard work in producing a high quality product.

**Action:** WWTWG members interested in the November 14 point source data application demo should contact Megan Thyng ([thyng.megan@epa.gov](mailto:thyng.megan@epa.gov)) for details.

11:00 **Adjourned**

Call Participants:

Ed Dunne, DC DOEE  
Michelle Williams, CRC  
Maria Schumack, PA DEP  
Matt Richardson, VA DEQ  
Vic D'Amato, TetraTech  
Lew Linker, EPA CBPO  
Megan Thyng, EPA CBPO  
Jeff Sweeney, EPA CBPO  
Rashid Ahmed, NYS DEC  
Allen Brockenbrough, VA DEQ  
Will Hunley, HRSD  
George Onyullo, DC DOEE  
Mohsin Siddique, DC Water  
Dana Hill, EPA Region III  
Valerie Lopez, EPA Region III