

Revised Agenda for AC Meeting #4

Thursday, July 16, 2020 from 9:30 a.m. to 3:00 p.m.

Digital Platform Login <https://global.gotomeeting.com/join/510730421>

or Dial In (408) 650-3123; Access Code: 510-730-421

ROLE OF ADVISORY COMMITTEE:

To advise Ecology's permit writer as to which **conceptual approaches** are preferred for reducing nutrient loads from WWTPs discharging directly to Puget Sound through a general permit, and the reasons why.

- This committee will not be drafting permit language; that is the job of the permit writer.
- Ecology envisions a continuing role for this committee in providing a venue and voice for input during the active permit term.

THE MEETING'S GOALS:

1. Continue to get to know each other and make progress towards our goals
2. Share feedback on PSNGP conceptual approaches that members gathered from their constituents
3. Begin to further understand, discuss, and gather feedback about the planning requirements
4. Continue to discuss conceptual approaches to the cap and optimization requirements
5. Work towards areas where the AC can come to agreement
6. Begin to formulate draft recommendations for further discussion
7. Discuss future AC meeting schedule and agree on next steps

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9:20 Log onto meeting platform and troubleshoot any technical issues

9:30 Welcome and AC member introductions; review the meeting's agenda, goals (chair)

- Today we have several invited guests who will join our discussion at the 10:00 agenda item

9:35 Share feedback gathered from PSNGP AC caucus groups (facilitator)

- Each PSNGP AC caucus lead, in turn, will share an overview of the feedback gathered in discussions with constituents since our last AC meeting. Caucuses were asked to discuss:
 - Optimization is an Adaptive Management Strategy to limit the discharge of TIN to the greatest extent possible for the plant's design and stay below the load cap. Do you understand the goal of optimization and the proposed components? How would you define optimization?
 - Optimization can mean a range of activities with a range of associated costs. Some optimization approaches require planning, others do not. Ecology envisions these possible optimization plan contents
 - Evaluate possible operational adjustments to drive nitrification/denitrification
 - Investigate minor retrofits (i.e., < 5% equipment budget)
 - Evaluate septage receiving policies and procedures
 - Evaluate side-stream management process changes
 - What other optimization options could be considered?
 - Where might the challenges lie?
 - What are universal optimization requirements that could apply to all dischargers?

- What concepts/principles do you agree with? Why?
- What concepts/principles do you disagree with? Why?
- Do we appear to be moving toward a common understanding/definition of optimization in the context of the first PSNGP?
- Did caucuses have additional discussion around preferred options for the cap calculation?
- We will pick up both of these topics in our discussion after lunch. Caucus members please email your report out notes to our facilitator.

10:00 Begin our discussion about planning (permit writer)

- Introduce our guests; each will share their initial thoughts about:
 - How might this overall process of making long term progress toward nutrient reduction successfully dovetail with other growth management and planning processes?
 - What are some concepts that could be most helpful to apply to the cap calculation process in a way that accommodates smart growth in Puget Sound region?
- Review context for PSNGP planning requirements:
 - At our last meeting we began to understand the GMA framework within which utilities plan capital improvements to accommodate growth. The **goal** for this portion of the agenda is to discuss what types of planning should be required to support future nutrient load reduction in the short and long terms while continuing to support smart growth in this first permit cycle.
 - Federal and state law are driving the PSNGP development to address a water quality problem resulting from excess nutrient loadings.
 - While utilities will not be expected to meet numeric water quality limits during the first 5-year permit term, they will need to demonstrate that they are not making the water quality problem worse, i.e., that they are not increasing nutrient loadings. Ecology intends to set a cap for each plant to stay below during the first 5-year PSNGP term.
 - Planning plays a crucial role in helping plants achieve future nutrient load reduction while continuing to support smart growth in this first permit cycle.
 - The cap is intended to be part of an achievable narrative limit before numeric water quality based effluent limits (WQBELs). The intent of short-term planning is to help prepare utilities to meet future nutrient WQBELs.
 - Ecology does not expect plants to make capital investments during the first PSNGP. Pre-work, evaluation, and planning should begin during the first permit term.
 - Optimization, adaptive management, and planning work together with the cap to form the narrative limit during the first permit term.
 - Planning requirements should be structured in a way that does not penalize plants already using nutrient removal technologies and focuses instead on plants need to build/implement a treatment type that is amenable to increased nutrient removal.
 - Plants with approved nutrient reduction designs, or designs currently in the process of getting Ecology approval, would not be required to do additional planning during the first permit term.
 - The GMA framework within which utilities plan capital improvements to accommodate growth should support long-term plant upgrades where needed to meet WQBELs.
 - Ecology is looking for recommendations for how to accommodate smart growth while first keeping the water quality problem from getting worse and then making improvements.
- Discuss possible PSNGP planning requirements
 - What types of adaptive management should be required to support optimization and keep plants from exceeding the cap?
 - What type of planning/feasibility analysis should be required when a cap is exceeded?
 - What types of short-term planning should be required to support nutrient reduction in both the short and long terms?
 - A scope of work submittal for a nutrient reduction evaluation during the first permit term or submission of a previously completed plan that contains elements of the nutrient reduction

- evaluation that includes a full assessment of current plant design and possible treatment improvements
- Identification of process modeling that will be needed for future evaluation of proven nutrient removal technologies
- Engagement in 2024-2025 comprehensive planning updates and six-year plans to address lack of plant capacity for additional nutrient loading
 - What are cities' and counties' abilities to concentrate short-term growth where nutrient limits can be met during the first permit term, and where reductions are achievable in later permits?
- Updates to the jurisdiction's General Sewer Plan (GSP) to support nutrient reduction evaluation
 - The objective of the GSP is to detail existing conditions of the sewer system and treatment facilities. These plans are also used by local governments to identify anticipated needs for future facilities and services, compliance with new regulations, population growth and water quality impairments.
 - GSP updates should include preliminary engineering investigations that provide enough information to determine both technical and financial feasibility of an identified improvement or nutrient reduction strategy.
- What types of long-term planning should be initiated to support further nutrient reduction in the long term?
 - Note that long-term planning may fall outside of the first PSNGP term. Ecology envisions the second PSNGP term requiring an engineering report ([WAC 173-240-060](#)) to narrow possibilities for future design focus and select an upgrade alternative for purposes of meeting the WQBEL.
 - To inform that report and further GSP updates, as part of a nutrient reduction evaluation, might utilities be required in the first PSNGP term to:
 - Identify possible locations for satellite treatment plants or reclaimed water facilities, and/or
 - Investigate possible alternative discharge/outfall locations, and
 - Fully understand site suitability for various types of future plant upgrades. Identify limitations that might impact feasibility of approaches to be considered in the future:
 - Available footprint for plant upgrades
 - Operational costs (what is a reasonable threshold for this determination?)
 - Capital costs (what is a reasonable threshold for this determination?)
 - Engage in 2024-2025 comprehensive planning updates and six-year plans to address lack of plant capacity for additional nutrient loading
 - What are cities' and counties' abilities to concentrate short-term growth where nutrient limits can be met during the first permit term, and where reductions are achievable in later permits?
 - What other planning options could be considered?
 - Where might the challenges lie?

10:45 Break

11:00 Continue our discussion about planning (permit writer)

11:55 Wrap up discussion about planning (chair and facilitator)

- What are some key themes from this morning's conversation about short and long term planning?
- Questions for AC members to gather feedback from constituents on planning:
 - What concepts/principles do you agree with? Why?
 - What concepts/principles do you disagree with? Why?
 - What planning requirements could apply to all dischargers (except those that already have nutrient reduction technologies)?

12:00 Break for lunch

1:00 Continue our discussion of optimization and cap calculation (permit writer and chair)

- Optimization:
 - What were some key themes from this morning's caucus reports about optimization?
 - Do we have an emerging consensus around the definition of optimization? The role of adaptive management?
 - Does the AC agree that the first PSNGP should require optimization at plants where it is feasible?
- Cap:
 - What were some key themes from this morning's caucus reports about the cap? From the planners?
 - How can the cap and optimization requirements both accommodate plants' contracted capacity and achieve nutrient reductions in the first PSNGP?
 - Should the cap calculation accommodate existing rates of growth by including some sort of growth factor? If so, how should an appropriate growth factor be determined?
 - Outstanding questions:
 - Does the AC agree on an averaging period: seasonal (May-Oct, or July-Sept) or annual?
 - Does the AC agree on a definition of the best available data for the calculation at each plant?
 - Does the AC agree that the cap should focus on a plant's overall pattern, not a single maximum day discharge?
 - Does the AC agree on a preferred calculation approach?
 - What are AC members' evolving thoughts about the cap as part of a narrative limit rather than a target?
 - What do AC members think about how compliance with the cap should be assessed?
 - What do AC members think about using the expression of the cap together with optimization requirements as an opportunity to achieve the nutrient reduction through adaptive management?

2:20 Break

2:30 Open Public Comment (facilitator)

- People will be called upon in the order in which we received your request to comment as indicated upon registration for today's virtual meeting platform.
- Please limit your comment/question to about 30 seconds

2:45 Future AC meetings and expected discussion topics (chair and facilitator)

- Meetings are scheduled on August 20, September 30, and October 21. Please mark your calendars!
 - These meetings will be held from 9:30am-3:00pm with a one-hour lunch break.
- Here are the proposed discussion topics for future meetings:
 - Thursday, August 20: introduce monitoring and compliance; continue with cap, optimization, and planning (invited local planners will return for this discussion)
 - Wednesday, September 30: continue discussion of all topics, determine where our agreements lie, and begin to finalize the committee's draft recommendations
 - Wednesday, October 21: review and adopt final recommendations. This will be our last meeting prior to Ecology issuing draft permit language for an informal public review.
- Process reminder: We will discuss each topic during at least two meetings, so that we can discuss evolving recommendations with our colleagues before finalizing our draft recommendations. Please take some time to read the updated "evolving recommendations" document after each meeting.

2:50 Recap of today's meeting (chair and facilitator)

- Summarize emerging agreements, decisions, action items, and next steps from today's meeting
- Caucus leads are reminded to send the facilitator their written reports from discussions with constituents

3:00 Adjourn