

**Summary of Engineering and Planning (E&P) Subcommittee March 4, 2021
Meeting for March 2021 MWPAAC General Meeting**

**Infiltration/Inflow (I/I) Control Program – Task Force Recommendations for
Voluntary Best Management Practices**

The King County Regional Infiltration and Inflow Control Program has determined that as much as 75% of the capacity in the regional conveyance system is taken up by infiltration and inflow during peak flow conditions. Of this I/I flow, it is estimated that 50-70% comes from side sewers in some areas. If we can reduce this source of I/I and depending on the level of reduction, we could avoid between \$100 million and \$1.6 billion in project costs over the next 40 years for some new regional conveyance projects.

The MWPAAC member agencies will play an important role in achieving this goal.

The I/I Control Program Team, in partnership with the E&P I/I Task Force, have identified four voluntary actions (Best Management Practices or BMPs) that have the highest potential to reduce or prevent I/I from side sewers, are applicable to many member agencies, and are straightforward to implement. One is regulatory, while the other 3 involve customer education.

1. Prohibit unauthorized connections – revise or modify city codes (Districts to work with their local Cities)
2. Notify customers (e.g., letter or door hanger) about roots in side sewers (observed during CCTV of mainlines)
3. Provide customers with side sewer maintenance information (e.g., bill stuffers)
4. Provide customers with information about unauthorized connections (e.g., bill stuffers)

King County would prepare a toolkit with examples, model code language, and the customer handouts for member agencies. Based on the toolkit, member agencies would develop their own customer handouts for distribution to their customers. Over time, these actions are expected to reduce the I/I from side sewers within their jurisdiction.

Timeline

- March 24, 2021 – present the 4 actions at the full MWPAAC meeting, with a request that the members discuss these actions within their jurisdictions.
- April 1, 2021 E&P meeting – draft a recommendation letter from full MWPAAC to the WTD Director to implement these actions
- April 28, 2021 – present the recommendation letter to full MWPAAC for approval
- Summer 2021 – WTD prepares materials and distributes to member agencies
- Fall 2021 - member agencies prepare customer materials and begin to implement program

Puget Sound Nutrient General Preliminary Permit (Draft) Update

Portions of Puget Sound, particularly shallow areas in bays, experience low dissolved oxygen levels that harm wildlife. Excess nutrients introduced to Puget Sound from various sources increase algal blooms that deplete the oxygen. Ecology is developing a Puget Sound Nutrient General Permit intended to reduce nutrients in discharges from wastewater treatment plants. The draft permit is scheduled to be released for formal public comment in May 2021. The permit would go into effect Fall 2021 for a 5-year term. The first permit term will involve data collection and attempts to optimize nutrient reduction through low-cost operational changes. The next permit term likely will require capital investments of up to \$6 billion to install nitrogen treatment technologies to reduce the nutrients in the discharges to Puget Sound from WTD's wastewater treatment plants.

WTD's concerns about upcoming permit include:

- Puget Sound has naturally low dissolved oxygen levels that pre-date European settlement of the region. There is no compelling evidence that humans have caused decreasing dissolved oxygen levels; rather, climate effects may contribute.
- Many scientists and experts believe that Ecology has not used best practices and sufficient data in their use and analysis of the numerical model that predicts the impacts of wastewater treatment plant discharges on Puget Sound.
- 80-90% of the nutrients in Puget Sound come from naturally-occurring ocean inputs (about 70% of the remaining human-caused nutrients come from wastewater treatment plants).
- Modeling shows that even if wastewater treatment plants reduced nutrient discharges to the maximum proposed levels, the shallow bays would still experience low dissolved oxygen levels.
- The process to develop the nutrient permit was accelerated much faster than other permits, with little opportunity for public input.
- The feasibility of expanding/modifying treatment plants and the resulting cost increases to ratepayers has not been considered. Monthly sewer rates could increase to approximately \$240 per month by the mid-2030's (compared to \$47 per month today).
- Requests to consider alternatives such as a bubble permit (allowing reductions at some treatment plants to offset the nutrient discharges at other treatment plants) and water quality trading have been ignored by Ecology.
- The language in the draft permit is ambiguous and confusing, and does not provide adequate time for data collection and analysis that would inform future actions.

MWPAAC will receive additional briefings as the draft permit is released for public comment.

Questions?

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