

Draft NPDES Permit Renewal – West Point Treatment Plant

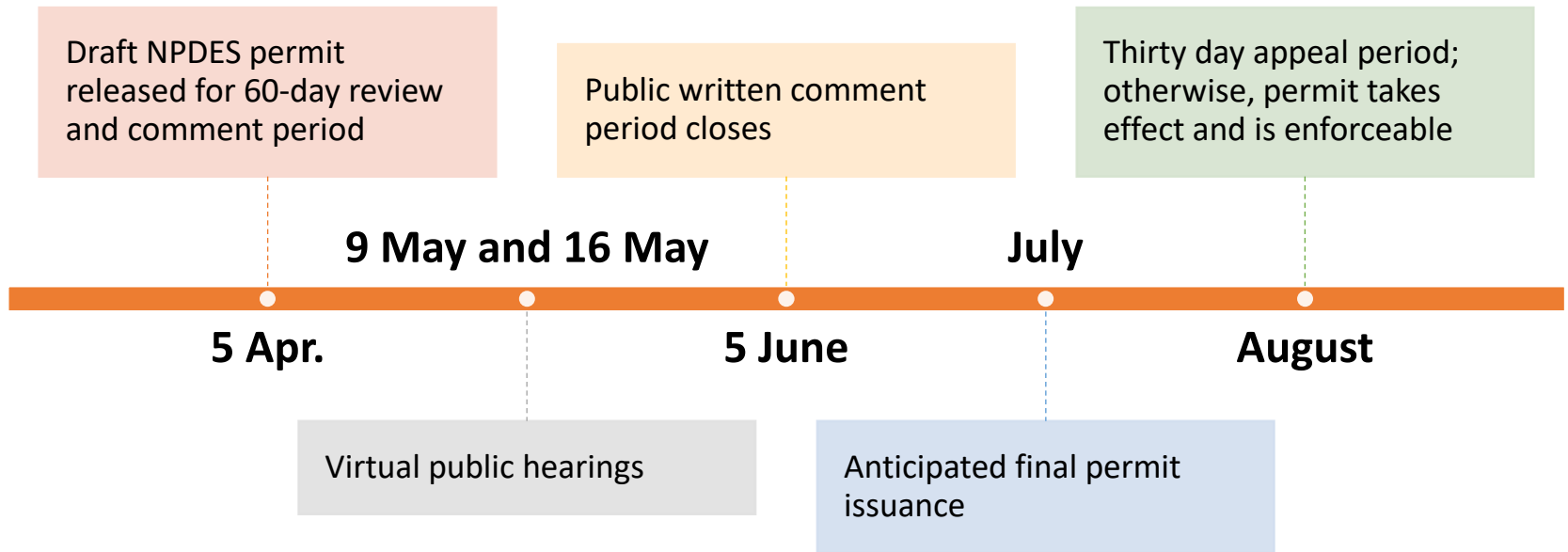
MWPAAC General Meeting

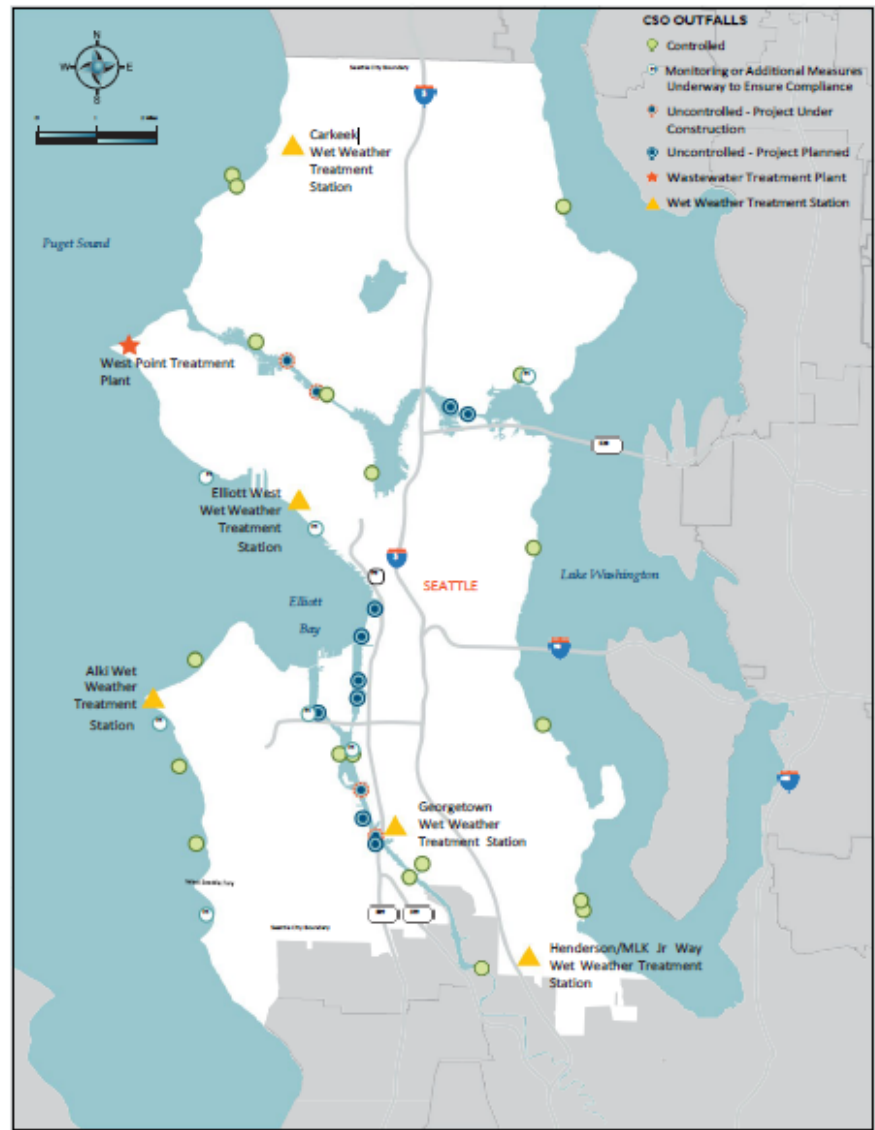
April 26, 2023

Key Concerns

- **Elliott West WWTS** - accelerated schedule and new requirements will further drive up costs
- **New PFAS source investigation program** for industrial users, including an ambitious survey schedule and implementation
- **Overall worsens affordability** and adds risk to ability to comply

Timeline





New or more restrictive effluent limits

Eliminates credit for “storage-only” (no discharge) events and tightens monitoring for Total Suspended Solids (TSS) compliance.

Lower Total Residual Chlorine (TRC) effluent limit will require more dechlorination which will exacerbate pH limit non-compliance

Elliott West Wet Weather Treatment Station (WWTS) may require a UV system and upgraded outfall

New copper limit may require the use of additional chemical polymers

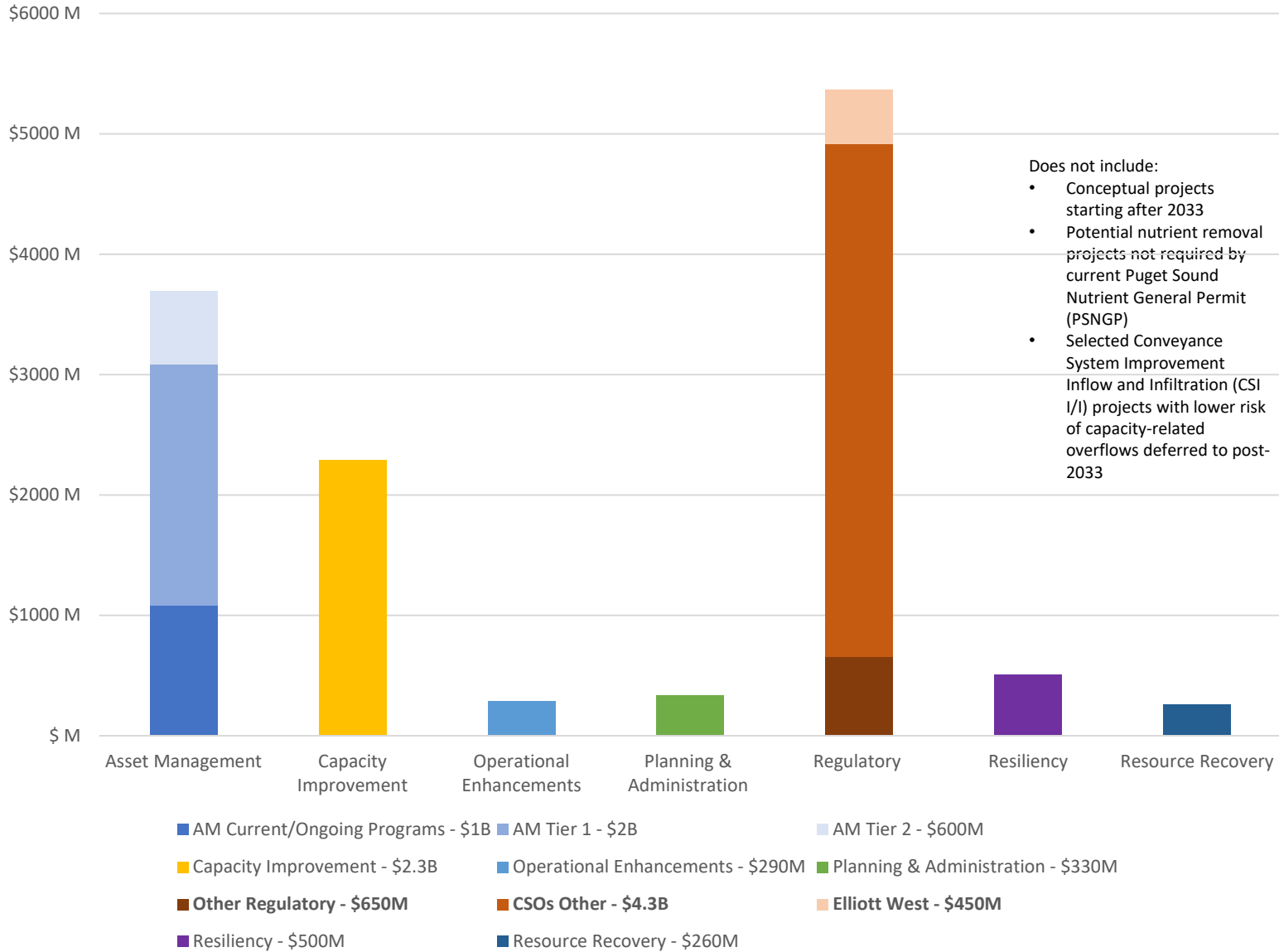
Elliott West WWTS compliance schedule

- Ambitious schedule for capital improvements at Elliott West – project must go to bid in 2028
- Requires significant upgrades to existing wet weather treatment plant at an estimated cost of \$450M
- Accelerating Elliott West project schedule impacts ability to address asset management, other regulatory, and capacity needs

New Industrial Waste Source Control Program for PFAS

- Requires industrial user survey on very tight timeline, developing Best Management Practices (BMPs) for customers, and implementation by July 2025
- Requires new quarterly monitoring of PFAS in West Point influent, placing the burden on the wastewater treatment system and ratepayers
- Risk of non-compliance: missing milestones, new/ambiguous requirements, and potential for third-party lawsuits

2024-2033 Capital Improvement Program Conceptual Project Estimates at Completion (Escalated \$)



Next Steps

- Inform MWPAAC and member utilities of permit effects
- Monitor public comment
- Develop and submit a King County comment letter to Ecology
- Evaluate Final Permit and determine whether to accept or appeal

Questions?