

Draft NPDES Permit Renewal – West Point Treatment Plant

MWPAAC Comprehensive Engineering and
Planning Subcommittee Meeting

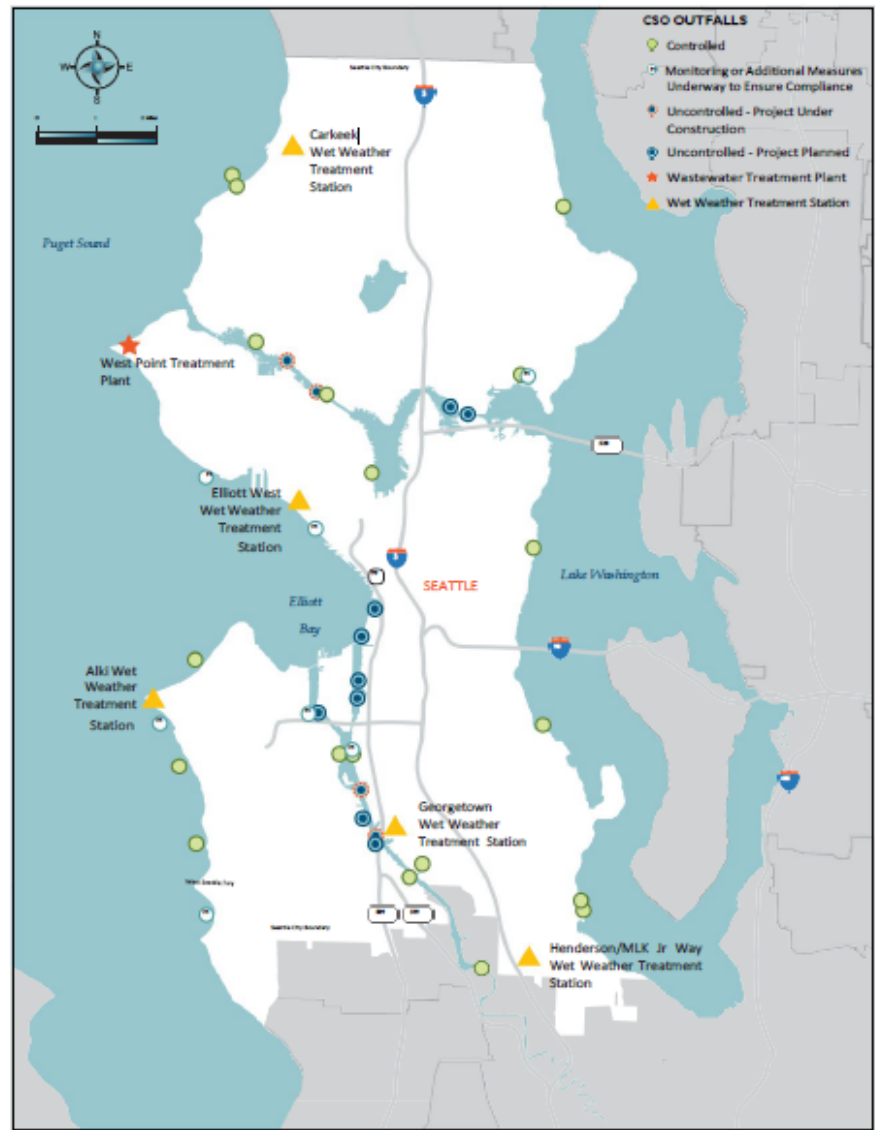
June 1, 2023

Key Concerns

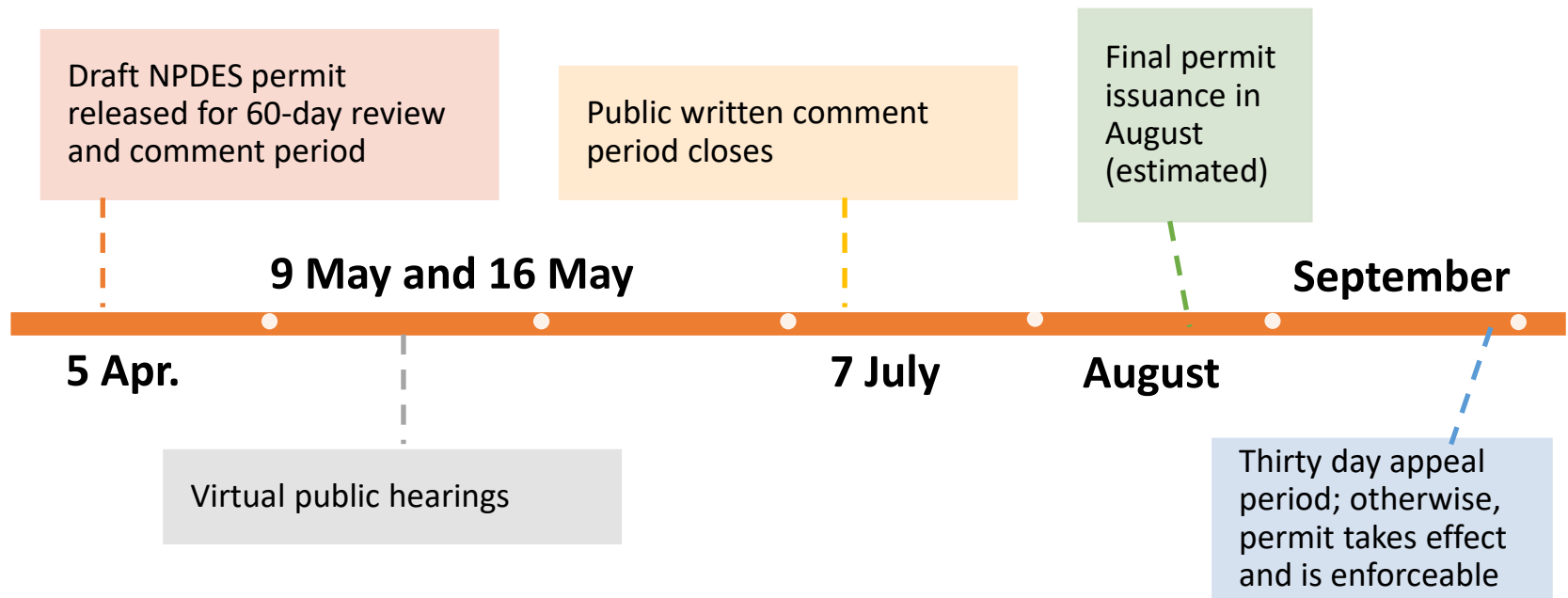
- **Overall increased costs and permit conditions**
- **New PFAS industrial source evaluation program and monitoring**
- **New CSO pollution prevention requirements**
- **New restrictions on CSO Wet Weather Treatment Effluent**
- **Ambitious timeline and new requirements for Elliott West**

Permit – additional costs of compliance

Permit Requirement	O&M Costs (5yr)	Capital Project Costs
New copper/residual chlorine effluent limit	? ~\$250k	\$50-125M (Elliott West)
Total Suspended Solids removal efficiency - monitoring	? ~\$250k	? \$100'sM (Alki)
PFAS - industrial pretreatment – user survey and source control	\$500k	n/a
Pollution prevention (NMC#7)	\$2-3M	n/a
Environmental studies/lab	\$250k	n/a



Permit review timeline



New or
more restrictive
effluent limits for
CSO Wet Weather
Treatment Stations

Low copper and Total Residual Chlorine (TRC) effluent limits, and TRC monitoring requirements

** low TRC limit for Elliott West affects chlorine vs. UV light

Comments

** WTD seeks additional consideration on requirements and options

** Monitoring averaging should reflect the discharge conditions

** Time schedules needed for facility data plan and analysis

New or
more restrictive
effluent limits for
CSO Wet Weather
Treatment Stations

Total Suspended Solids (TSS) compliance

** Restricts credits for solids removed and eliminates entirely for “storage-only” events

** Insufficient information to evaluate the permit or future compliance

Comments

** Broad regulatory changes have significant implications for compliance and potential corrective facility improvements

** All TSS at WWTS equates to <1% of TSS inflow at West Point

** More analysis is warranted to define issues, objectives and options

Elliott West WWTS compliance schedule

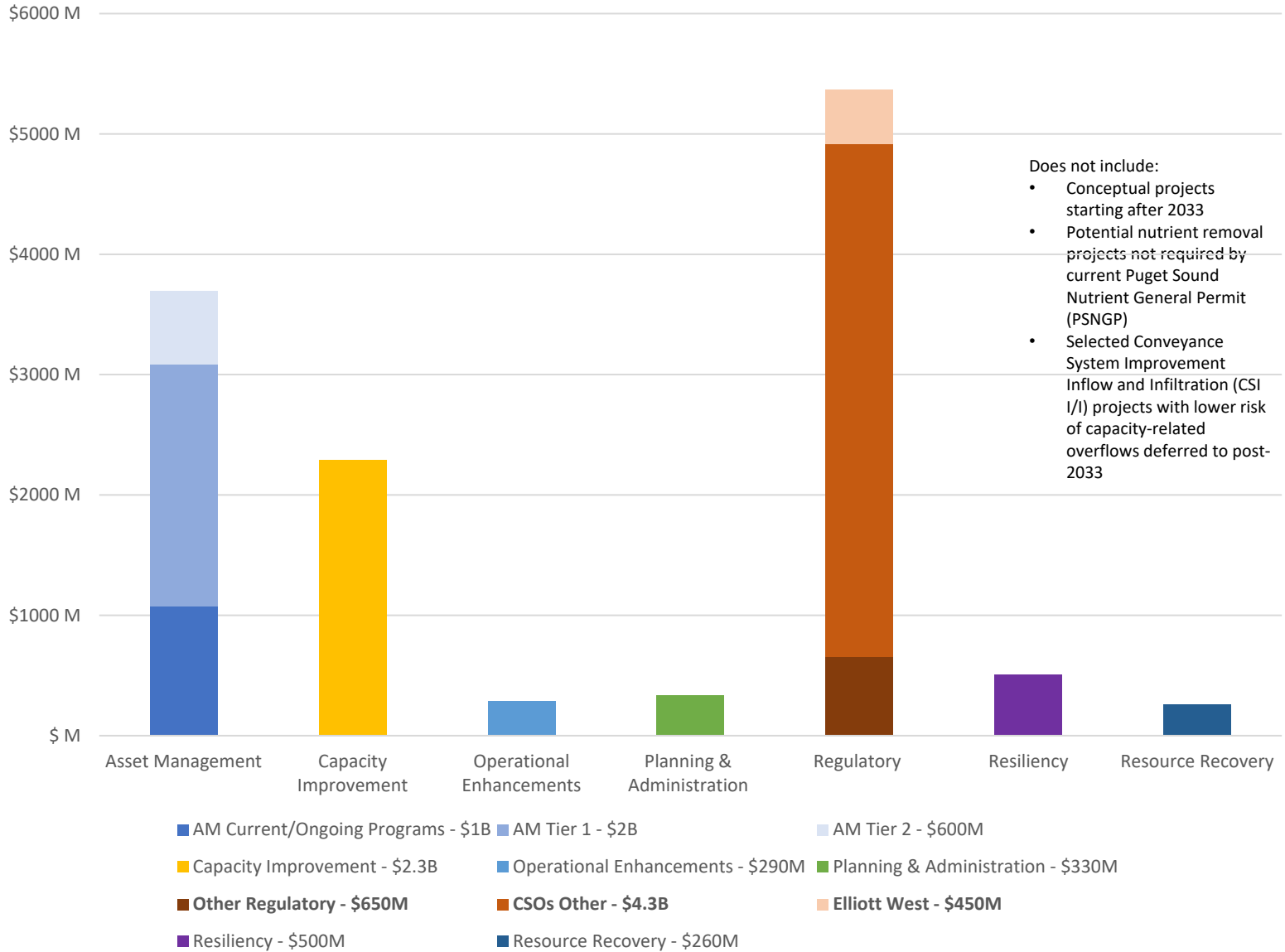
Concerns:

- Ambitious schedule for Elliott West project
- Accelerating Elliott West project schedule negatively impacts ability to address asset management, other regulatory, and capacity needs

COMMENTS

- Information obtained from TRC/copper limits could help determine change in schedule

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



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
- New 2-year quarterly monitoring of PFAS in West Point influent in 2025-2026
- Risk of non-compliance: missing milestones, new/ambiguous requirements, and potential for third-party lawsuits

COMMENTS

- Support efforts to focus work on the most important contributing PFAS sources
- Seek schedule adjustments, prioritization to significant industrial users only, and integration with the County's voluntary studies already in progress to monitor PFAS

Next Steps

- Public Comments due July 7
- Ecology will prepare "responses to comments" and issue a final permit
- A 30-day window to appeal the permit starts upon permit issuance

Questions?