

# NPDES Permit Renewal – West Point Treatment Plant

## Summary of Final NPDES Permit – Issued 4/29/24

MWPAAC – General Meeting

June 26, 2024

# AGENDA

- **NPDES final permit administrative process**
- **Responses to comments**
- **Changes in the final permit conditions**
- **Obligations and implementation of permit requirements**
- **Timeline – next steps**

# Permit Renewal Timeline and Comment Process Overview

- **Ecology permit renewal process:**
  - **Entity draft permit - February 2023**
  - **Public draft permit - April 2023**
  - **Public Comment period - ends July 7, 2023**
  - **Final permit and responses to comments published – April 29, 2024**
  - **30-day appeal period ended - May 29, 2024**
- **Effective date of the permit: June 1, 2024**
- **Permit expiration: May 31, 2029**

**Responses to  
comments:  
120+ grouped  
issues/responses**

**Nutrients**

**Effluent requirements**

**Mixing zones**

**Monitoring**

**Bypasses**

**PFAS**

**Sediment monitoring**

**CSO program topics**

**Elliott West project schedule**

**Chemicals of emerging concern**



# West Point NPDES Permit – New Requirements

Permit Requirement	Consequences of NPDES Permit
S1: New West Point total PCBs effluent limit	<ul style="list-style-type: none"> <li>• Limit equals quantitation level of current EPA 608.3 laboratory method</li> </ul>
S2.B: New TSS removal efficiency for CSO WWTS	<ul style="list-style-type: none"> <li>• New assessment method; event based; excludes solids capture during storage events</li> <li>• Potential compliance changes; facility improvements (if needed)</li> </ul>
S6.E: PFAS – Industrial Waste survey and permitting	<ul style="list-style-type: none"> <li>• No substantive changes – increased schedules by two years: customer survey of potential PFAS sources due by April 2027</li> <li>• Include pollution prevention/source reduction evaluation in permits for Significant Industrial Users (SIUs) by April 2028</li> <li>• Evaluate other BMPs/pollution prevention for SIUs by April 2028</li> </ul>
S11.B: Nine Min. Control #7 – source control for CSOs	<ul style="list-style-type: none"> <li>• Additional pollution prevention activities for contaminants contributed to CSO basins</li> <li>• Any effectiveness studies to include information on PCBs, copper, and 6PPDQ (toxic tire dust)</li> </ul>

# West Point NPDES Permit – New Requirements

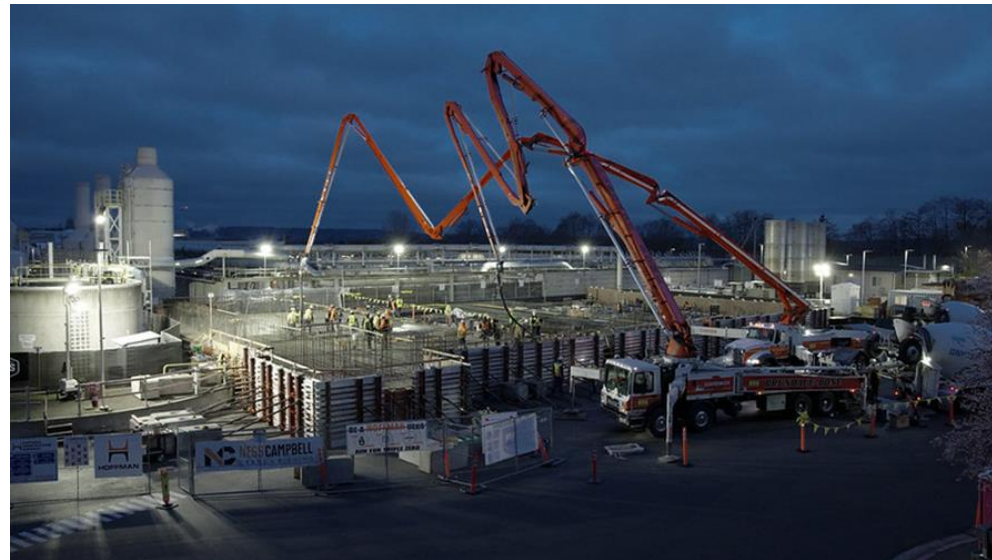
Permit Requirement	Consequences of NPDES Permit
S11.C: Corrective actions for previously controlled CSO outfalls	<ul style="list-style-type: none"> <li>• No changes</li> <li>• New tiered adaptive management approach for remedial actions based on magnitude and duration that a CSO remains out of control</li> </ul>
S15.A: Elliott West effluent limits, <b>mixing zone</b> , and compliance schedule	<ul style="list-style-type: none"> <li>• No changes: ambitious schedule – identify to complete construction by Dec. 2031</li> <li>• <b>Mixing zone authorization rescinded; re-authorization reconsidered upon project completion</b></li> </ul>
S16: Henderson/MLK CSO treatment station copper reduction assessment	<ul style="list-style-type: none"> <li>• <b>Identify/characterize copper source</b></li> <li>• <b>Identify opportunities to reduce copper</b></li> <li>• <b>Prepare report by Nov. 2028; identify schedule for improvements by Nov. 2030</b></li> </ul>

# Elliott West Compliance Schedule – Next Steps

- **Elliott West draft engineering report due June 30, 2024**
- **Engineering report will document use of AKART technology (all known and available and reasonable prevention, control, and treatment)**
- **Adaptive process to achieve copper compliance**
- **Request for mixing zone at permit renewal**

## Timeline – Next Steps

- **Ongoing monitoring and reporting changes**
- **Pollution prevention – develop and start implementation plan by July 2025**
- **Longer term: PFAS industrial survey**
  - **H/MLK copper source study**





# Potential Fiscal Impacts of West Point Permit

- **Modest budget impact for near-term operational, planning, and capital costs**
- **Elliott West costs are considered in rate forecasts. New permit changes budget impacts are currently uncertain**
- **Longer term requirements around CSO wet weather treatment or PFAS regulations may have future budget impacts**

# Next Steps – Potential Regulatory Challenges

- Effluent Limits: non-compliance can lead to penalties and facility improvements
- Comprehensive Influent and Effluent Monitoring
- Discharge Monitoring Reports
- Violation Incident Notification and Response
- Sediment sampling near treatment and CSO outfalls
- Industrial Pretreatment Program
- CSO Post Construction Monitoring (pre- and post-project monitoring)

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# Questions?

Jeff Lafer- NPDES Permit Administrator

[Jeff.lafer@kingcounty.gov](mailto:Jeff.lafer@kingcounty.gov)

Ph. (206) 477-6315



**King County**

Department of  
Natural Resources and Parks

**Wastewater Treatment Division**

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