

Ecology Pretreatment Update

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**And any general questions*

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Programs in WA

Delegated programs, 2 new since last year!

- | | |
|------------------|--------------------|
| 1. King County | 10. DCWA/CRWWD |
| 2. Lynnwood | 11. Kennewick |
| 3. Everett | 12. Richland |
| 4. Bellingham | 13. Yakima |
| 5. Tacoma | 14. Spokane City |
| 6. LOTT | 15. Spokane County |
| 7. Vancouver | 16. Walla Walla |
| 8. Pierce County | 17. Pasco |
| 9. Port Angeles | 18. Quincy |

Ecology issues SIU permits in 50 municipalities, partners with local POTW to implement pretreatment.

PFAS Approach

Wastewater - Washington State Department of Ecology

Using water quality permitting to control PFAS discharge into the water

Pretreatment Focus

Permit writer case-by-case decisions

Municipal POTW permits

Who: Delegated pretreatment authority, non-delegated >5MGD, non-delegated with industrial users likely to have PFAS

What: 1) PFAS source identification through improved IU survey process. Capture possible PFAS sources that may be existing permitted SIUs or unpermitted IUs.

2) Require identified SIUs to conduct PFAS pollution minimization planning (source identification and evaluate control opportunities).

3) Evaluate other implementable BMPs

4) Possibly influent and effluent PFAS monitoring

Industrial User permits (Ecology issued)

Who: Industry types that are known or suspected of using/discharging PFAS

What: 1) Quarterly effluent monitoring for two years.

2) Source identification and evaluation of control opportunities.

PFAS Approach

Wastewater - Washington State Department of Ecology

Considerations/note for permitting approach.

- Currently no Washington State surface water quality standards
EPA developing aquatic life criteria (freshwater). Once EPA publishes recommended criteria, Ecology can adopt these criteria.

- Groundwater dischargers
Federal MCLs become enforceable groundwater standards under WAC 173-200.

- Permits specify using Method 1633 to analyze 40 analytes until EPA approves a PFAS method in 40 CFR 136.

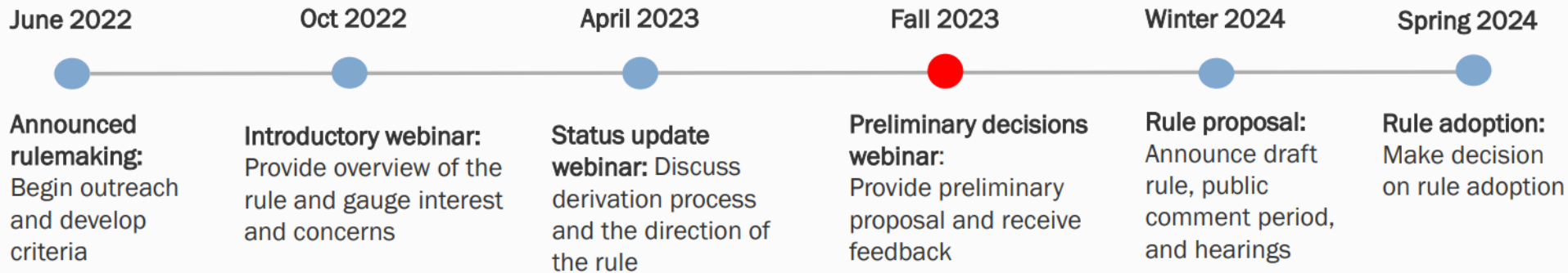
Aquatic Standards Update



<https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-201A-Aquatic-Life-Toxics-Criteria>

Aquatic Toxic Criteria

Timeline



*Beyond this timeline, EPA must approve WQS before Ecology can use those WQS for actions under the CWA, such as establishing effluent limits.

Aquatic Standards Update



<https://ecology.wa.gov/Regulations-Permits/Laws-rules-rulemaking/Rulemaking/WAC-173-201A-Aquatic-Life-Toxics-Criteria>

Aquatic Toxic Criteria

Recommend reviewing slides from October 10 preliminary update,

<https://fortress.wa.gov/ecy/ezshare/wq/standards/ALTCRuleWebinarOct102023.pdf>

- Preliminary changes to aquatic life criteria to most metals and several organic parameters.
- PARIS query of existing permits to look at effluent limits and priority pollutants to determine impact of this rulemaking.