

Draft discharge scenarios for the Policy Forum

Ecology Water Quality Program Policy Forum
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Human health-based surface water quality criteria and implementation
tools rule-makings

Purpose of the scenarios

To illustrate how changes in HH criteria and implementation tools could affect permitting

Will address both typical and difficult situations

4 scenarios developed – one marine, three fresh water

We'll look at the scenarios after discussion of specific criteria modifications and implementation tools changes – generally at the end of each Policy Forum.

Examples:

- Would a change in risk level translate to different permit requirements?
- Would a change in length of a compliance schedule translate to different permit requirements?

What the scenarios will include

Situations to address questions we heard during the Implementation Tools workshops, including:

- What are requirements for discharges to 303(d) listed waters vs. non- 303(d) listed waters?
- What are requirements for new discharges vs. existing dischargers
- What if the natural condition of a HHC chemical is above the criteria concentration?
- What if sources of toxics outside the control of the CWA result in criteria not being attained?

More scenario information

- Focus is on human health criteria toxics – PCBs, arsenic
- Also aquatic life-based criteria- temperature and mercury
- Each scenario can be used to examine situations where the waters are:
 - Not listed as impaired
 - Listed as impaired – no TMDL
 - Listed with TMDL completed

#1 - Marine Scenario

Larger growing community with several industries

Most complex of the 4 scenarios

Marine Scenario – shown with listing and TMDL information	
303(d) listings:	Mercury (aquatic life) and PCBs (HHC)
TMDL status:	Completed and loads allocated
Discharges:	POTW Drinking Water Provider Stormwater 5 Industries (2 new) Other sources

2, 3, and 4 - Freshwater Scenarios

Smaller eastside communities

Freshwater - scenario #2 – shown with listing and TMDL information East-side community

303(d) listings:	Temperature
TMDL status:	Completed and loads allocated
Discharges:	POTW

Freshwater - scenario #3 – shown with listing and TMDL information East-side community dominated by agriculture

303(d) listings:	DDT
TMDL status:	Completed and loads allocated
Discharges:	POTW 1 Industry (Fruit packer)

Freshwater scenarios cont.

Scenario # 4 - Natural conditions and the freshwater human health-based criterion for inorganic arsenic

This scenario addresses this question:

What if the **natural condition** of a HHC chemical in the waterbody is above the criteria concentration?

Scenario includes natural concentrations of As in drinking water (from groundwater) that meet the SDWA MCL but do not meet the SWQS criteria.

Freshwater - scenario #4 Eastside community	
303(d) listings:	None
TMDL status:	NA
Discharges:	POTW Industry

What you'll see as we discuss the scenarios

A marine scenario map with the discharges pictured
- one map for the marine scenario

A freshwater scenario map with the discharges
pictured - 1 map will include the three freshwater
scenarios

A written description of all the scenarios

We'll use the maps to discuss changes in discharge
situations and requirements as we discuss possible
revisions to HHC and implementation tools

Before the next meeting...

We will post information to help you get familiar with permitting requirements for listed waterbodies.

This will include links to the *Ecology Permit Writer's Manual*, with specific pages you'll want to look over before the next meeting.

Questions / Discussion?