



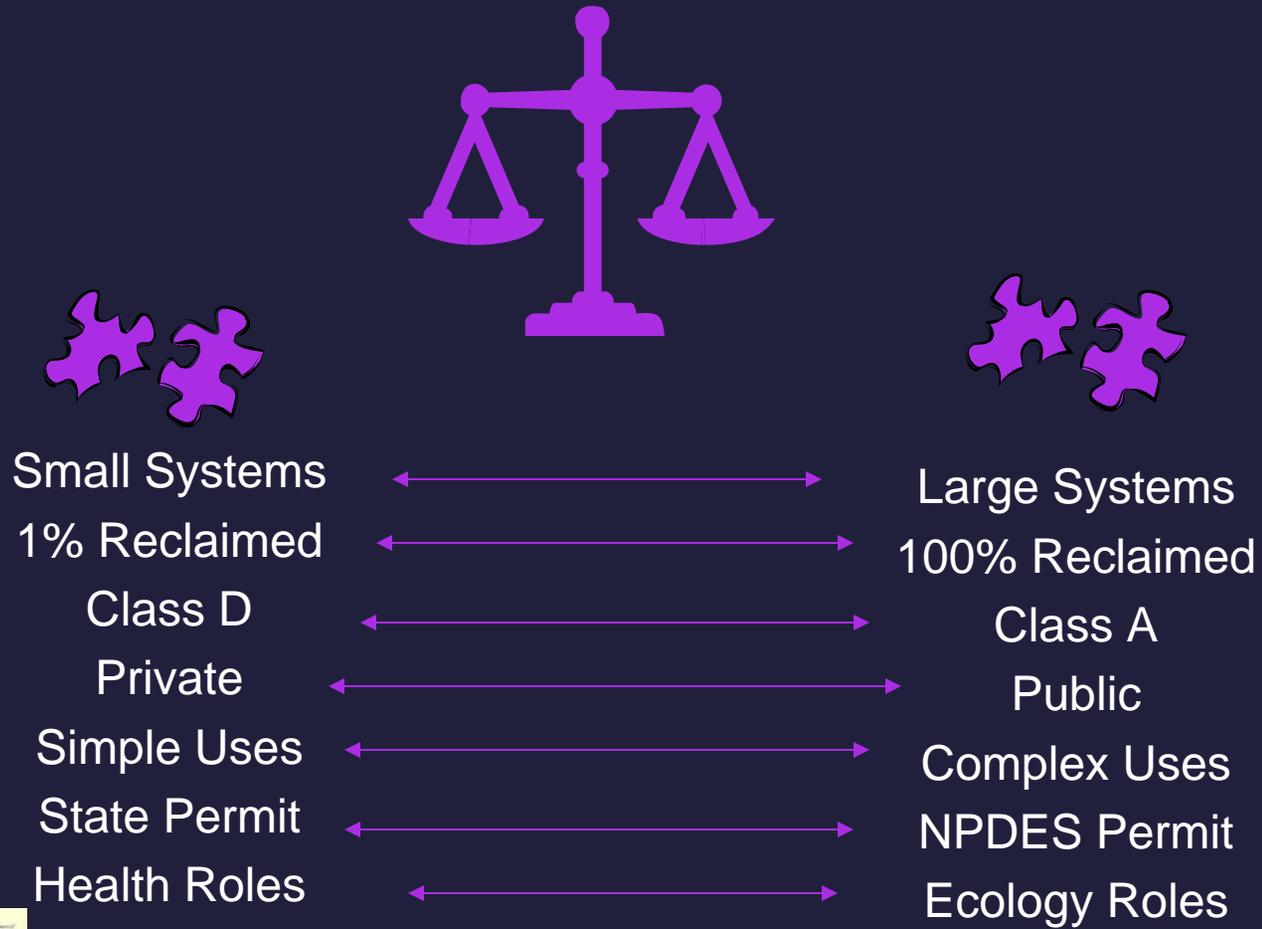
WASHINGTON STATE
DEPARTMENT OF
E C O L O G Y



Focus – The Permit Process

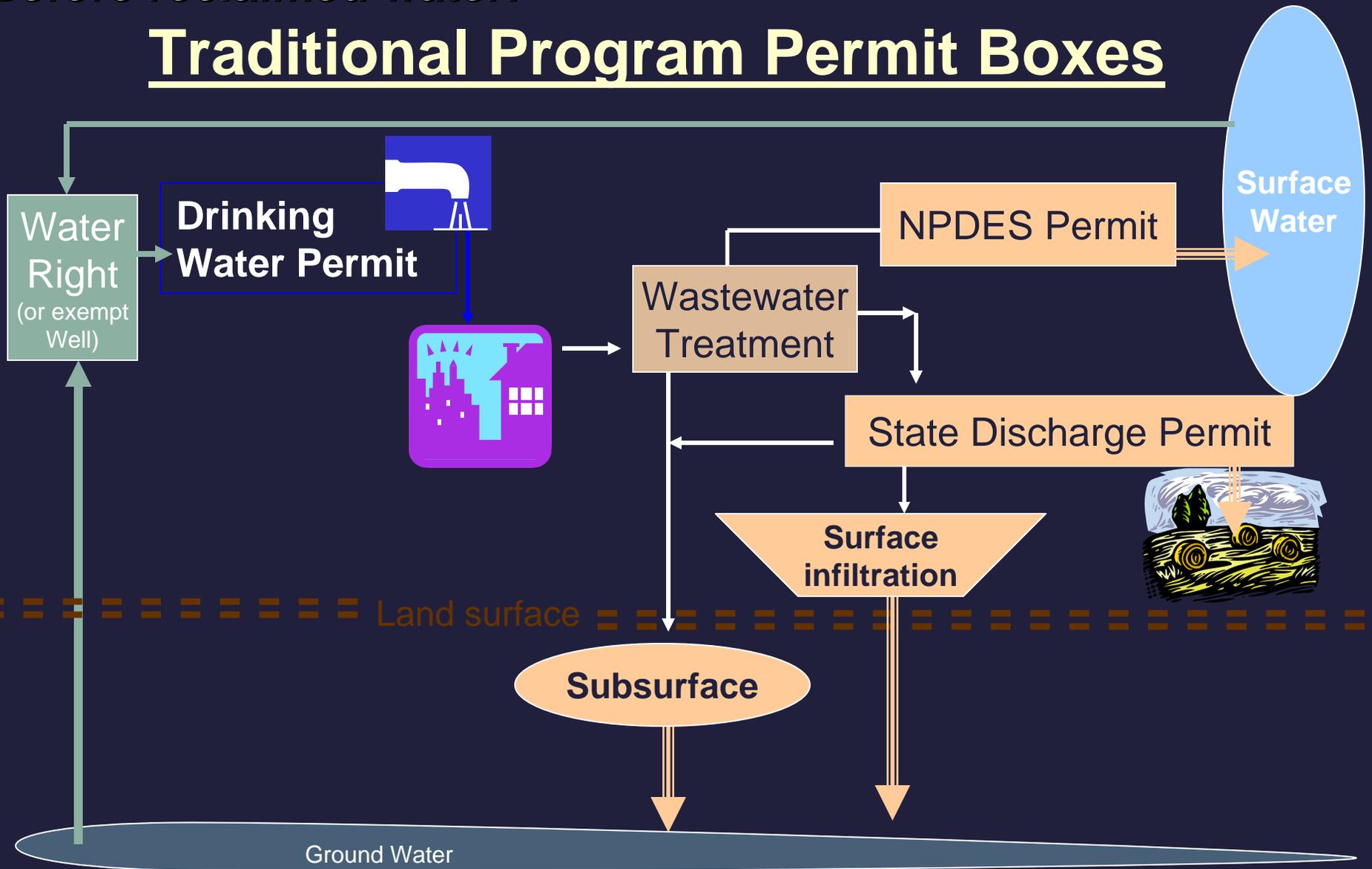
Reclaimed Water
Rule Advisory Committee
July 11, 2007

Review of the Permit Universe



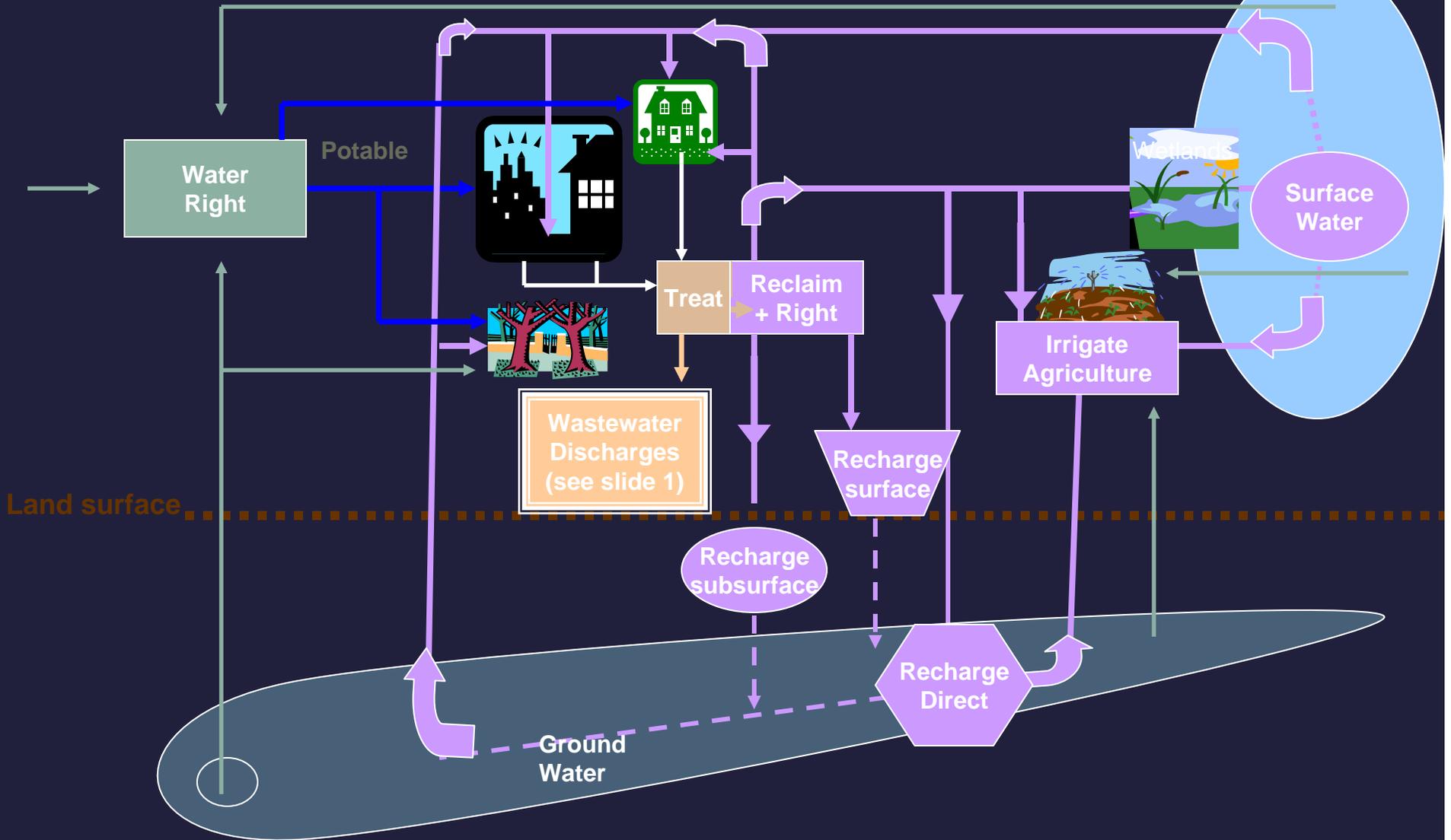
Before reclaimed water:

Traditional Program Permit Boxes



All Are Separate Permits

Reclaimed Water Permitting



Boxes Blurred - More Complexity - Single Permit!

The Existing Permit Process for Reclaimed Water

- 💧 Ecology issues the permits under authority of:
 - Ch 90.48 RCW “ The Water Pollution Control Act ”
- 💧 Includes Dept. of Health requirements in permit.
- 💧 Includes exclusive (water) right within the permit.
- 💧 Combines reclaimed water permit conditions with the NPDES and State wastewater discharge permits.
- 💧 One permit regulates water quality, location, rate & use.

How Well Does This Work?

- 💧 Confusing to regulators, permittees and consultants.
- 💧 Difficult to incorporate new ideas:
 - 💧 Reserving the 'exclusive right' for instream flows.
 - 💧 River conveyance for downstream use.
 - 💧 Aquifer storage and recovery.
 - 💧 Water right mitigation and 'credit'.
 - 💧 On-site systems (<0.1 MGD under DOH)
 - 💧 Zero discharge facilities.

Key Points from the RAC*

* rule advisory committee

- 💧 “No longer wastewater” – “use” not discharge.
- 💧 Reduce redundancy in agency reviews.
- 💧 Make it easier to understand.
- 💧 Streamline the administrative processes.
- 💧 Provide more certainty.

The Agreed Work Strategy

- 💧 Ecology and Health consider RAC input.
- 💧 Agencies work together to resolve issues.
- 💧 Report back to RAC on July 11, 2007.
- 💧 Get additional feedback from RAC.
- 💧 Agencies continue to work on the process.
- 💧 Revisit with RAC after ‘technical standards’.

Weekly Inter-Agency Work

- 💧 Included both staff and management input.
- 💧 Reviewed universe of types of permits.
- 💧 Reviewed traditional permitting boxes.
- 💧 Discussed existing permitting process.
- 💧 Investigated potential alternatives.
- 💧 Developed recommendations.

Four Recommendations:

1. Issue joint agency permits with designated lead.
2. Provide “seamless” inter-agency coordination.
3. May combine or separate the reclaimed water and wastewater discharge permits.
4. Allow up to 10 years before permit renewal.

Details Follow . . .

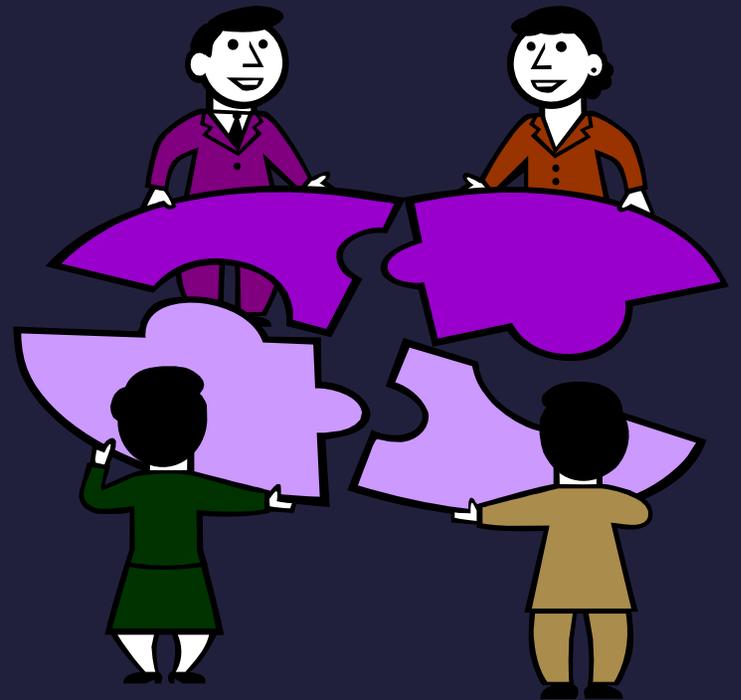
#1 Joint Agency Permits

- 💧 ALL reclaimed water permits issued as joint agency (and multi-program) permits.



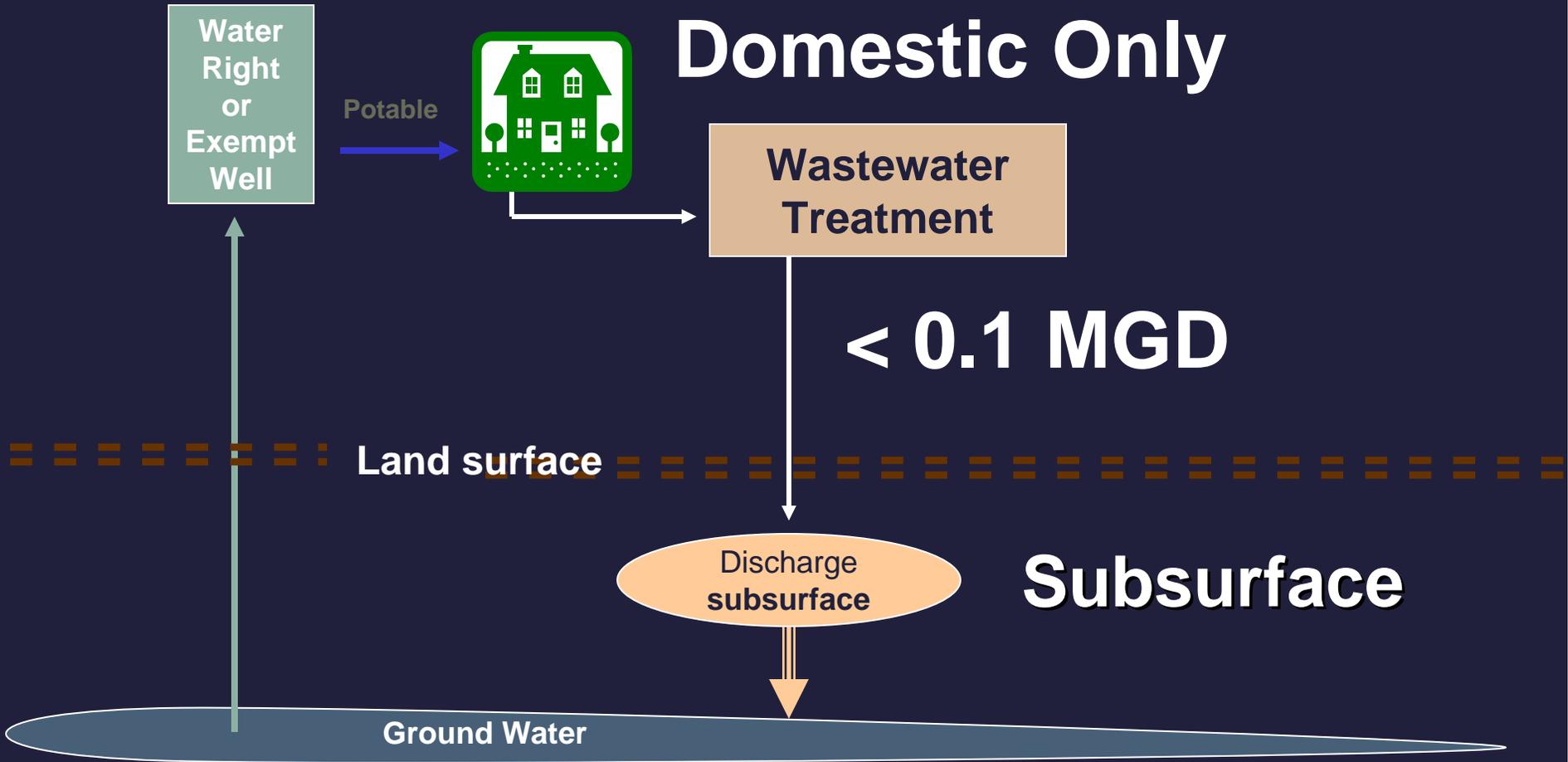
How to determine a lead agency

- 💧 Base it on current responsibilities.
- 💧 Default is Ecology.
- 💧 Examples follow ...



NOT Reclaimed Water Use

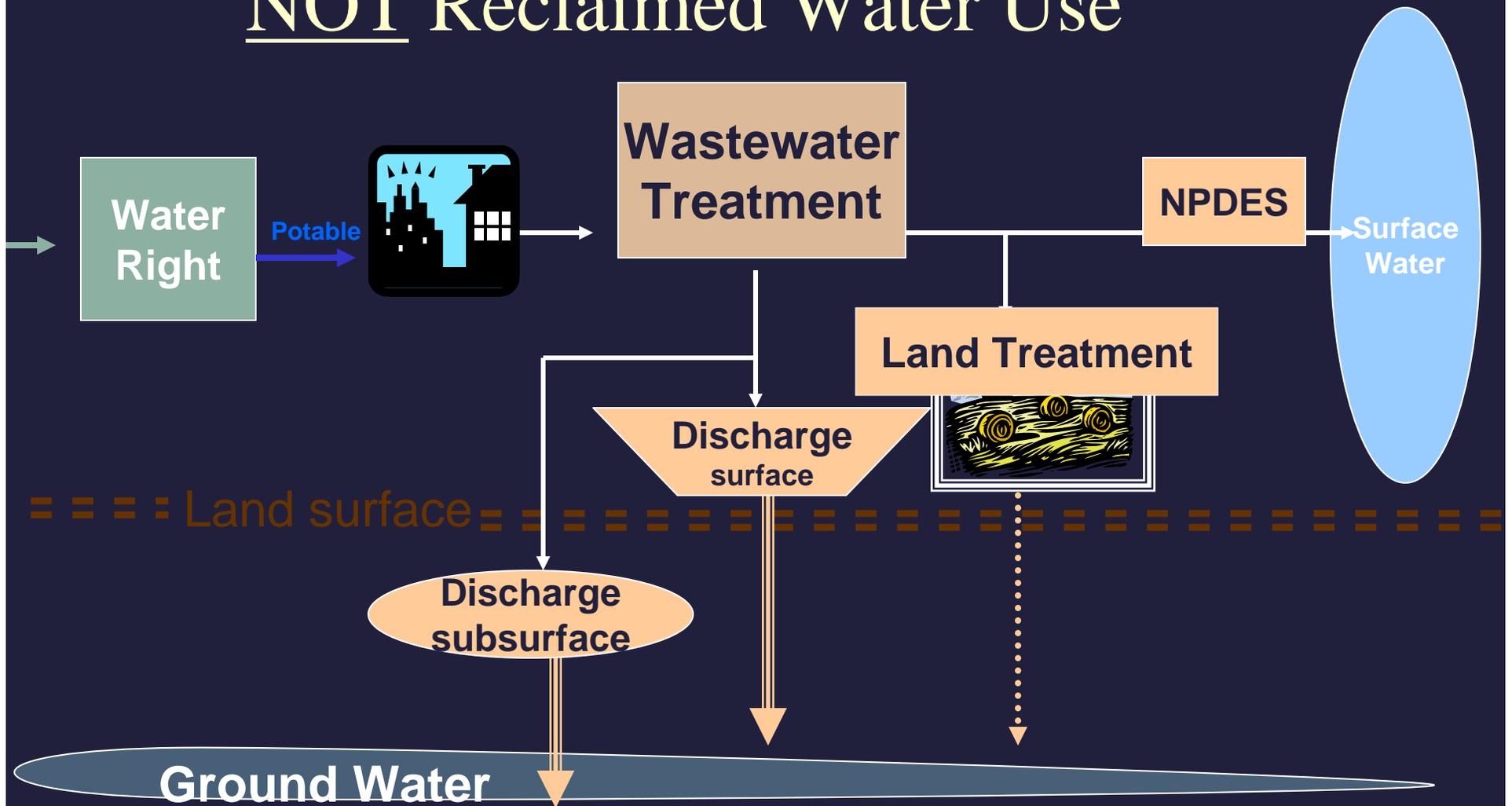
Domestic Only



Dept. of Health Permit

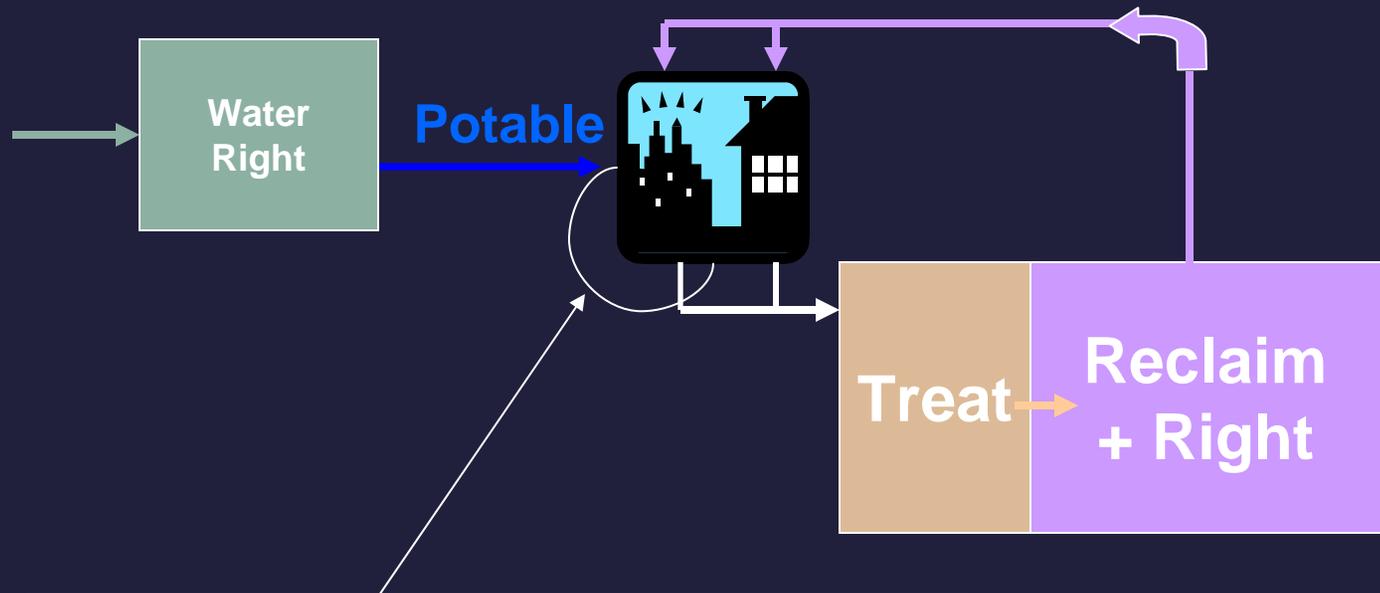
All other wastewater discharge permits

NOT Reclaimed Water Use



Dept. of Ecology Permit

Direct Use in Commerce or Industry

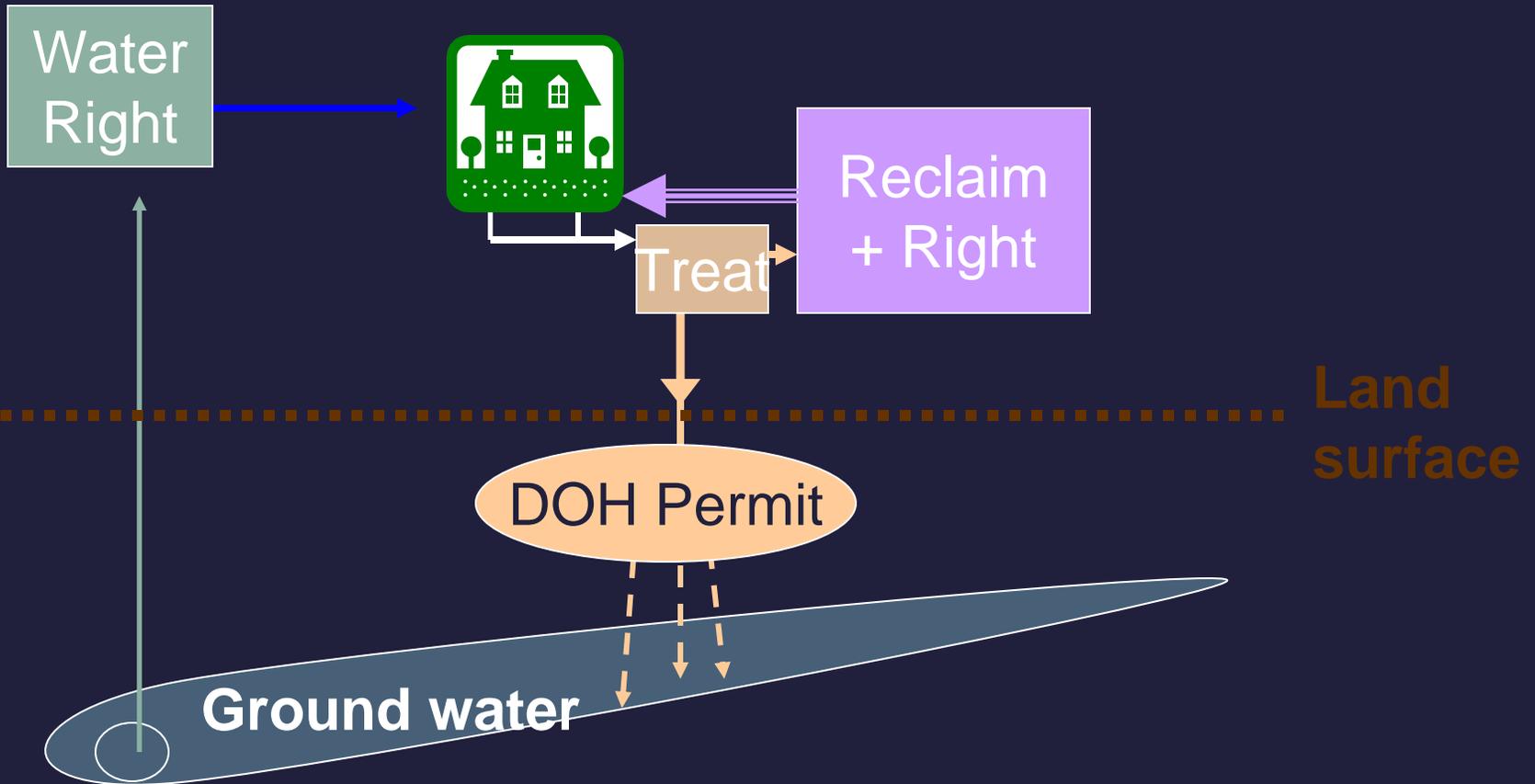


Note:

Recycling of industrial process water (NO sanitary) back to the industrial processes (not to other types of uses) does not require a permit.

**Lead Agency
Dept. of Health**

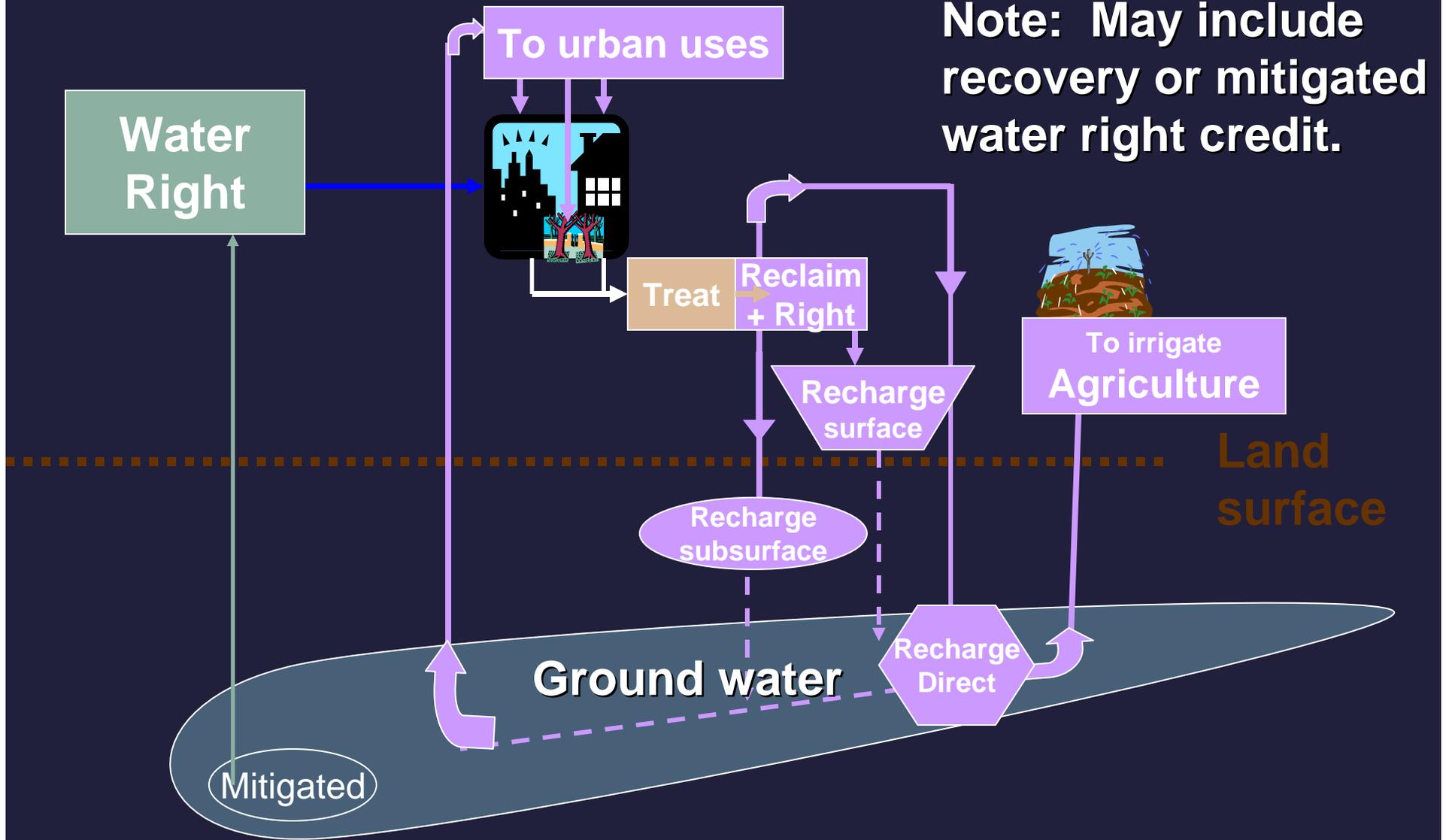
Localized Uses + domestic on-site < 0.1 MGD
(includes 'on-site' irrigation < 0.1 MGD)



Lead Agency: Dept. of Health

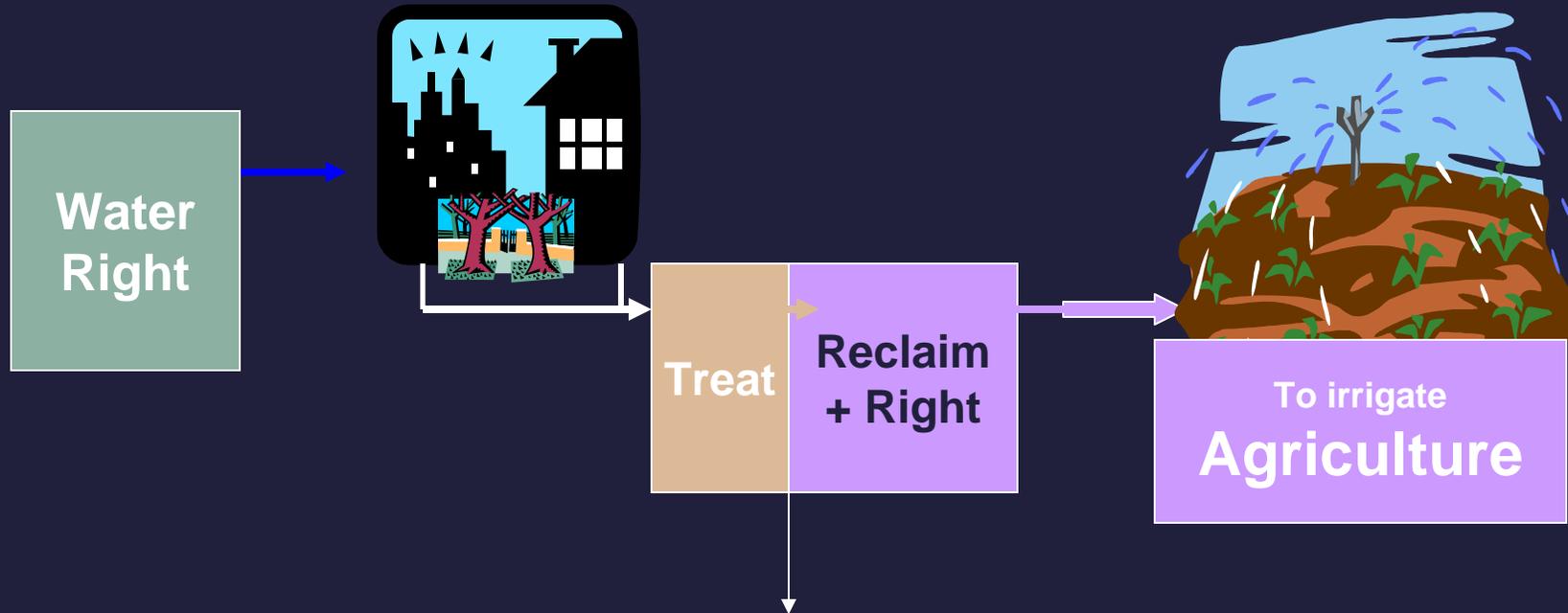
All Other Ground Water Recharge

Note: May include recovery or mitigated water right credit.



Lead Agency: Dept. of Ecology

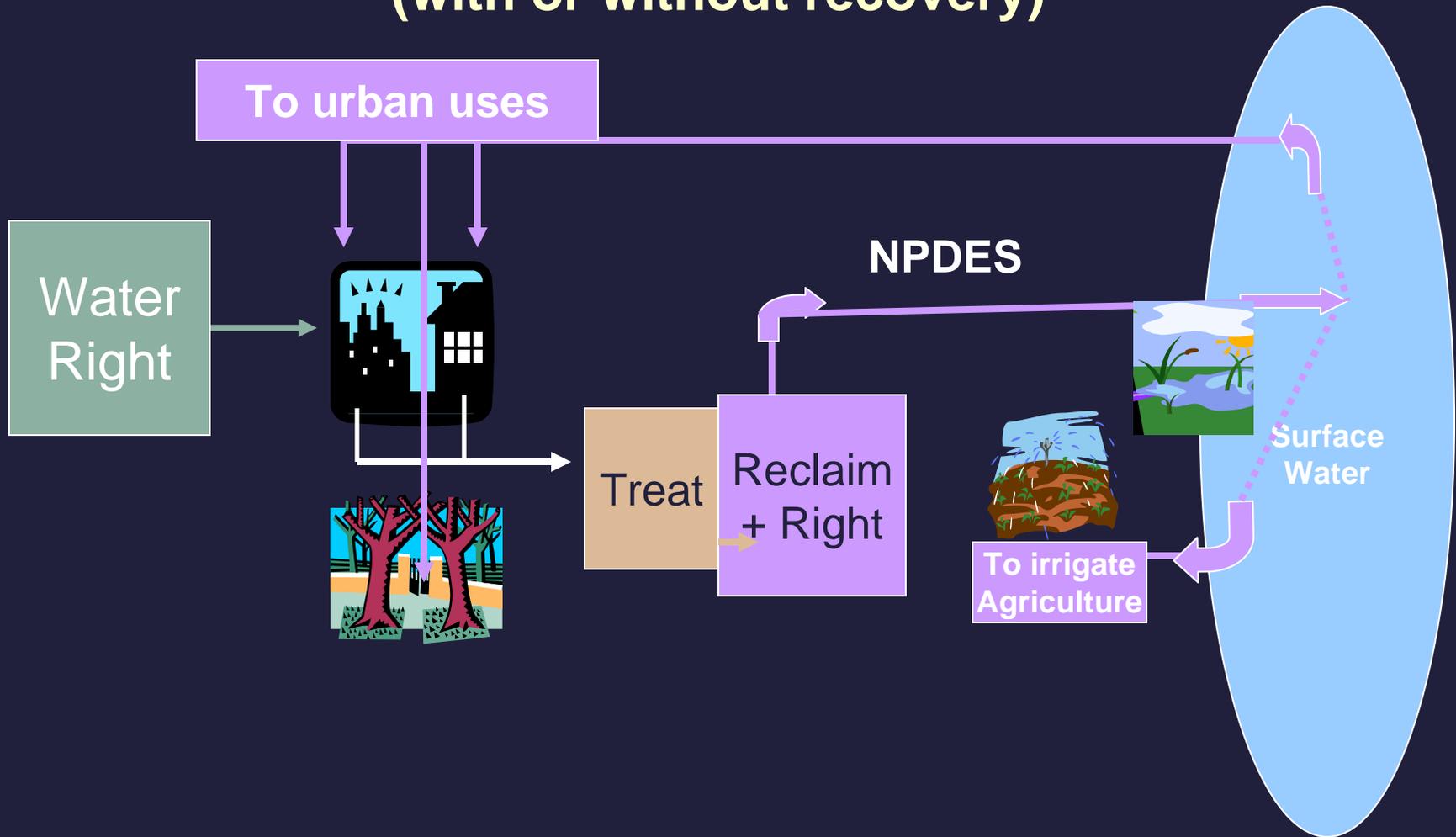
Agricultural Irrigation



Note: Ecology also issues the discharge permit when not irrigating crops.

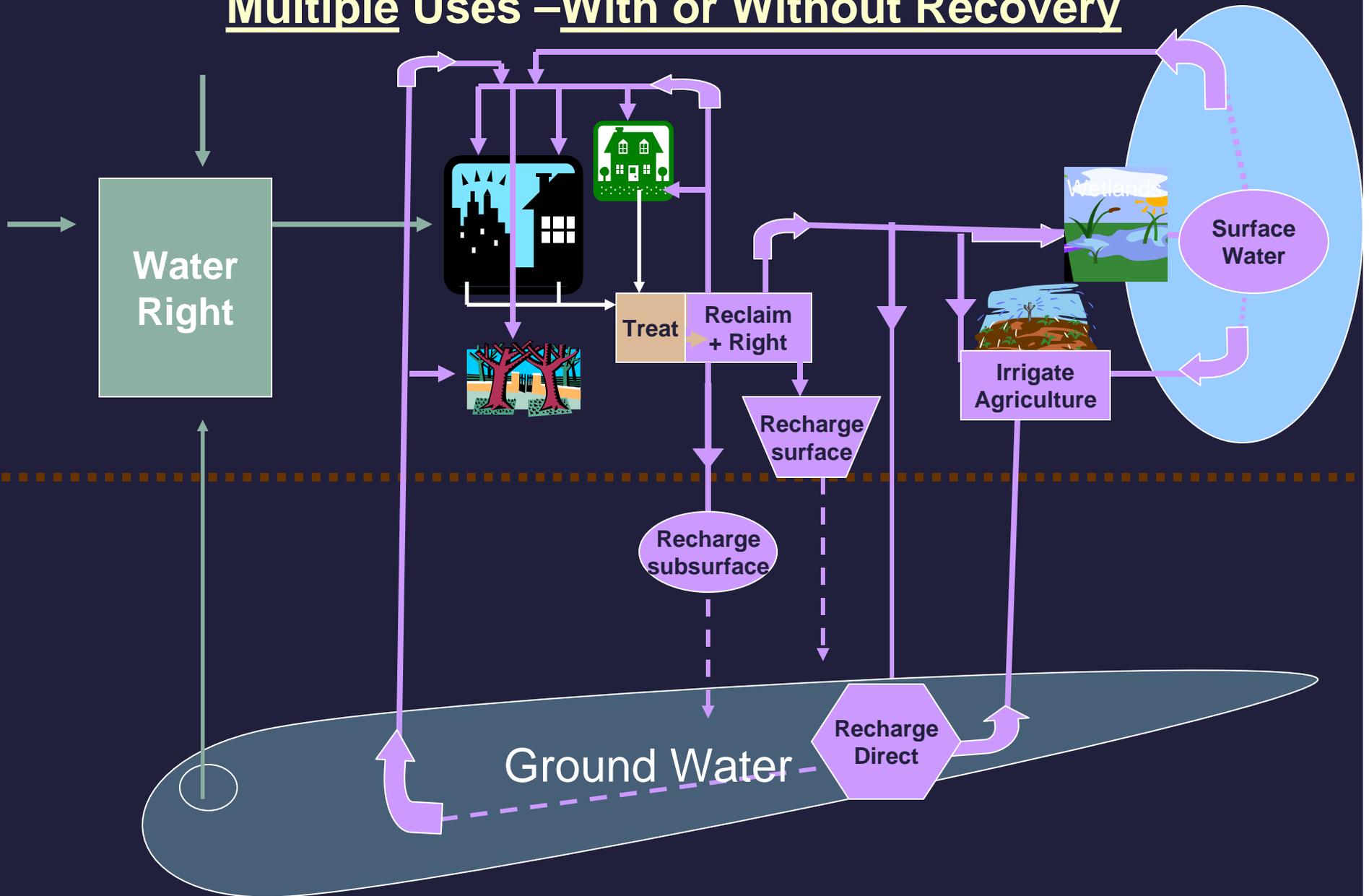
Lead Agency: Dept. of Ecology

Surface Water - Wetland or Stream Augmentation (with or without recovery)



Lead Agency: Dept. of Ecology (NPDES)

Multiple Uses –With or Without Recovery



Lead Agency: Dept of Ecology

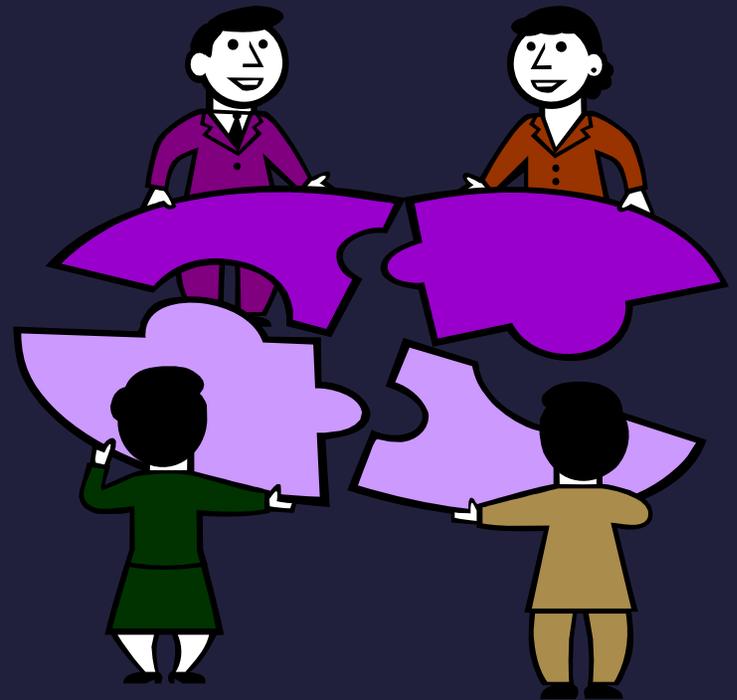
#2 Provide Seamless Coordination

- 💧 Office of Regulatory Assistance
 - use the permit center
- 💧 Lead agency will coordinate
- 💧 Use staff level workgroup
- 💧 Update interagency MOU
- 💧 Prepare guidance “purple book”



#3 Separate or Combined Permit

- 💧 Allows the Permittee a choice.
- 💧 Considerations:
 - 💧 Uses
 - 💧 Timing
 - 💧 Amount reclaimed.
 - 💧 Seasonal vs. year-round.
 - 💧 NPDES constraints.
 - 💧 Reliability options – storage or alternate discharge.



#4 Ten Year Permit With Conditions

- ◆ Allow up to 10 years before permit renewal.
 - ◆ Must resolve coordination issues with wastewater discharge permit.
- ◆ Include conditions required to continue operating within the permit.
 - ◆ Use DOH model of green, yellow, red compliance categories.



Try Out What We Can Before The Rule

- Use of the permit center as contact point.
- Lead review agency and seamless internal coordination.
 - Staff workgroup developing process.
 - Assure referrals occur.
- Some things are not as easy to change.
 - Fees assessment processes
 - Permitting authority
 - Seeking legal advice - AG office.





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Discussion

