

“Hot” Water News from WEFTEC 2005
Libby Ford, QEP, Sr. Env. Health Engineer

Categorical Standards

EPA is **considering** developing/modification categorical standards for: Steam Electric, Pulp & Paper, Tobacco Products; Drinking Water Facilities (will be proposed next year); Airport deicing (will be proposed next year); Vinyl Chloride and Chlori-Alkali Manufacturing. Currently the following categories are in litigation: Iron & Steel; Construction & Development and Coal Re-mining. In addition, EPA is revisiting how it assigns “toxic weighting factors”.

Municipalities with Combined Sewers

EPA is preparing a memo addressing what aspects of the CSO control program can be addressed in the permit and which will trigger a Consent Order. It will also address State versus federal enforcement.

Emerging Pollutants of Concern

EPA and many states are beginning to really focus their attention on such emerging water pollutants as endocrine disrupters, pharmaceuticals and pesticides in wastewater and in Ambient waters. Newer and (slightly) less expensive testing methods are being developed, and USGS has taken the lead in monitoring ambient waters for these pollutants. They are being found virtually everywhere some one tests for them and at levels that lab experiments suggest could pose a threat to aquatic organisms and, perhaps, to humans. WEF has scheduled a web conference on this topic on December 6. (http://www.e-wef.org/timssnet/meetings/tnt_meetings.cfm?primary_id=WCDEC05&Action=LONG&subsystem=MTG).

Phased TMDLs

EPA will be issuing a memo on Phased TMDL clarifying that all TMDLs must lead to compliance with water quality standards. Allocations can change in later phases.

Designated Aquatic Uses

EPA has released a draft memo on “tiered aquatic uses”. It’s available on EPA’s Office of Water Website. Susan Jackson is the contact.

Peak Wet Weather (Blending)

NACWA (formerly AMSA) and NRDC have released proposed “Guidance”^{*} on “Peak Wet Weather Flow Diversion” directed at the so-called “blending” of partially treated wet weather flow with fully treated POTW effluent”. The Guidance recognizes that this process is an “anticipated bypass” (see 40 CFR § 122.41(m)) for SSO systems.^{**} It requires a “no feasible alternative analysis” (“NFAA”)^{***} which is defined and described in the Guidance. Among other things cost can be considered. It’s expected to result in significantly less “blending”. Anticipated bypasses can be permitted, but with a goal of “continuous improvement”, the NFAA analyses will have to be periodically updated. If “blending” is in current permit NFAA will be required as part of renewal.

* While written as if it was Guidance written by EPA, EPA has just begun to review. They have stated that they are “pleased” with the Agreement. It appears to be a “viable approach”. OGC, OWECA will be reviewing with OW.

** 1994 CSO Guidance allows CSO community to do “blending” if it is a component of its LTCP.

*** WEFA is developing a set of Best Practices which addresses the elements identified in the Guidance.