

## Meeting Summary

### Utah Water Quality Standards Workgroup, Antidegradation Subworkgroup

June 5, 2013

See supporting materials at <http://www.waterquality.utah.gov/WQS/AntiDegSubworkgroup.htm>

#### List of Attendees

Name	Affiliation
Nicholas von Stackelberg	DWQ
Leah Ann Lamb	DWQ
Lisa Kirschner	Parsons Behle & Latimer
Leland Myers	Central Davis Sewer District
Brad Rasmussen	Aqua Engineering
Lareina Guenzel (phone)	USEPA

**Reasonableness Criteria for Selection of Least Degrading Reasonable Alternative:** Nick von Stackelberg presented an outline of proposed changes to the antidegradation review to clarify the determination of whether a less degrading treatment alternative would be considered reasonable with regard to cost effectiveness and affordability. Refer to supporting materials for an outline of the proposed modifications, and proposed revisions to the Implementation Guidance. No rule changes are proposed at this time. Policies from selected western states were reviewed.

The proposed modifications require additional information from the applicant regarding the expected pollutant removal from each treatment alternative, as well as life cycle costs for each alternative, in order to rank the alternatives by cost effectiveness.

#### Discussion

There was discussion regarding the utility and practicality of the additional information required from applicants. For instance, how do you weight a toxic pollutant (mercury) vs. a non-toxic pollutant (BOD) when ranking and weighting POCs? Is it possible to estimate with any certainty the removal efficiency of each treatment alternative for each POC?

Leland Myers felt the more qualitative method of ranking alternatives provided for in the current guidance was sufficient and more practical. He did not feel it would be possible to estimate pollutant removal for each treatment alternative with sufficient accuracy.

Leland wanted to retain the following text with regard to evaluating the feasibility of operation and maintenance costs:

*Alternative Operations and Maintenance (O&M) scenarios should be considered in the ranking process. An Alternative O&M scenario will generally be considered feasible if the annual cost increase is no more than 10% of the annual operating cost or 20% of the 20-year present worth, whichever is less.*

Lareina Guenzel requested that DWQ provide example spreadsheets that demonstrate the ranking and weighting of POCs, the ranking of the alternatives based on degradation, and the ranking of alternatives based on cost effectiveness.

Lisa Kirchner requested link be added to the EPA affordability spreadsheets.

General consensus that the proposed revisions could be tested if a paragraph was added that clearly indicated that DWQ may request this additional information for selected alternatives for some Level II reviews and that it is not a general requirement. Leave the qualitative procedures in the guidance as an option for less complex ADRs.

There was discussion of the net environmental benefit of the treatment alternative as a consideration when selecting the least degrading, feasible alternative. Lareina said they were not able to find a definitive policy statement from EPA on this. However, DWQ's authority is narrowly focused on protecting water quality, and other environmental considerations may be beyond DWQ's purview. Lisa suggested that the proposed language that lists "sustainability" as an additional factor to consider when selecting the preferred alternative may be sufficient to address net environmental benefit concerns. DWQ will review and develop proposed language to address net environmental benefit, if needed.

**Action Item: DWQ will revise the Implementation Guidance based on comments from the subworkgroup and redistribute for comments prior to next meeting. DWQ will develop spreadsheet tools to assist with the ranking procedures.**

#### Other Related Discussion

General consensus that a reference should be added to R317-3-1.3 that the Level II ADR needs to be completed in conjunction with the Predesign Report for a new facility or upgrade that will result in an increase in pollutant load.

**Action Item: DWQ will follow-up on this – need to improve notification of the permittee that the ADR needs to be completed at the beginning of the project planning process.**

**Next Meeting:** Meeting to be scheduled for late September-early October.