



ASSOCIATION OF CLEAN WATER ADMINISTRATORS

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Peak Wet Weather Flow Management Survey Summary 10-11-2018

27 States Responded to this Survey which closed on October 10, 2018

Q2: As it relates to a state's position on peak wet weather flow/blending:

- 23% of the responding states currently do not allow blending and would not support the allowance of blending in the future.
- 27% of the responding states currently do not allow blending but may support the allowance of blending in the future.
- 35% of the responding states allow blending and would support the allowance of blending in the future.
- 15% of the responding states currently allow blending and strongly support the allowance of blending in the future.

Q3: If a state supports the allowance of blending, which of these factors did the state view as most/least important to that analysis.

Most Important

- 78% for "size of the wet weather event"
- 76% for "permit limits still must be met"
- 52% for "facility is using specific type of technology"
- 68% for "facility is designed for blending"
- 74% for "used as a temporary solution"
- 78% for "does not create any new environmental concerns"
- 72% for "permitting authority can determine at any time blending is no longer a viable solution"
- 82% for "use of blending should be left to state discretion"

Least Important

- 38% for "size of the discharge volume"
- 38% for "receiving water body impaired"
- 32% for "facilities no larger than"
- 36% for "facilities no smaller than"

Q4: Please let us what other peak wet weather flow factors need to be considered beyond those presented in this survey.

- Most of the above really is a maybe. Blending can be allowed when infrastructure has proper O&M, I/I is reduced, and it is disinfected. Permit limits and WQS need to be met. Blending can be allowed on a case by case basis after an NFA analysis.



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- Our state views blending as a temporary alternative to SSOs or plant washouts that serves as a bridge until I/I or WWTP capacity issues can be adequately addressed.
- Blending could be acceptable if it provides a net environmental benefit (i.e. greater overall reduction of pollutants from an MBR w/ blending vs. an activated sludge plant).
- No feasible alternative and/or benefit to environment with treatment type outweighs blending that meets all permit limits.
- NPDES permits that currently authorize blending during peak wet weather flows should continue to be authorized, provided water quality standards are protected and permit effluent limitations following blending are being met.
- Should be based on rainfall/groundwater conditions and permit limits must be met.
- Our state does allow blending. However, we will consider enforcement discretion if the WWTP were to have a discharge from a wet weather event greater than the remedial design standard (25 yr/24 hr storm using growth conditions and normal soil moisture).
- Sampling requirements and frequencies during blending events. Potential changes to permitted effluent limits during blending events
- Whether inflow and infiltration reduction measures or system maintenance should be a minimum requirement for the authorization of blending.
- Please note, most WWTP upgrades today are to provide biological nutrient removal (BNR) activated sludge processes, and sending large peak flows greater than 2 to 1 peak to average flow will ruin and wreck the BNR processes.
- Please note, our state requires pathogen removal/disinfection of all flows, including peak flows "blended" into effluent flow.
- The state would have a difficult time of allowing blending, as it may violate the State's secondary standards. If a violation did occur as a result of a wet weather event, enforcement discretion would be used.
- Our state strongly requests that the rule address blending around tertiary treatment as well. Our tentative approach is to allow blending around tertiary treatment (e.g. Clearas, Ultrafiltration membranes, etc.) only at flows exceeding the average max monthly flow.
- We request that the final approval for blending remain with the state. Federal consistency in the approval process and cost/risk analysis would be useful (also potentially in establishing a uniform deterrent for blending). However, the final approval decision should remain with the state so as not interfere with implementation of other rules (e.g. if a facility were required to install additional clarifiers in order to ensure that blending does not occur, these costs may prevent them from installing treatment to meet a state's new phosphorus water quality standards, resulting in a



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variance. In such situations, the best environmental result would likely be to allow blending). Similarly, it may be necessary to blend to avoid SSOs, TPOs, solids washouts, damage to membranes, etc.

- Other considerations need to take into account include: 1) proximity to surface drinking water intakes, 2) technical ability to eliminate blending (space constraints), 3) frequency of blending, 4) whether the blending is around secondary treatment (pathogen removal and human health concerns) or tertiary treatment (nutrient removal - lower risk to human health). Additionally, blending around secondary treatment should not be allowed where permittees are violating bacteria limits (during or outside blending periods).
- A facility being designed for blending is not alone enough reason for blending to occur, but blending should not occur if this is not the case.
- We are a semi-arid state and only occasionally have massive wet weather events. We also believe separate stormwater/sanitary sewer outfalls are easier to monitor and regulate. Our state implements water rights with the prior appropriation doctrine, which would also be difficult to implement with blended sewer system.
- The state allows blending for POTWs with CSO flows and would strongly support blending for these circumstances. Did not understand what is meant by "acceptable" under temporary circumstances. Clearly a state may allow discretion post major natural disasters. We also don't understand what is meant by "temporary". How long a duration is relevant?
- The whole point of addressing I&I issues for POTWs is to keep the stormwater or groundwater out of the system. Many treatment plants have old infrastructure and are at design flow capacity, and adding wet weather flows will create issues. We do not know of POTWs in our state that actually have a bypass around their biological treatment units, so when peak wet weather flows affect the facility, it generally causes an overflow at the plant itself (although this is a very rare occurrence). It appears the rulemaking is going to apply to facilities that already have these mechanisms built in and may not be applicable here. In any case, we would encourage facilities to deal with the I&I issue and not make accommodations to accept flows they otherwise shouldn't receive.
- We consider blending to be a particular type of prohibited bypass and sometimes "approve" blending pursuant to 40 CFR 122.41(m) subject to expressed conditions.
- In our state, by regulation all sewage except that discharged from a CSO must be given a minimum of secondary treatment. Secondary treatment includes "significant biological treatment", which is 65% removal of BOD5 as a 30-day average.