



# City of Tacoma

## Environmental Services Commission

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Central Treatment Plant, 2201 Portland Avenue Bldg O, McKinley Park Conference Room  
AND

Virtually on ZOOM - Meeting ID: 875 2881 1317 Passcode: 946750

### AGENDA

Thursday, February 8, 2024 – 4:00 p.m. to 6:00 p.m.

1. Welcome
2. Public Comment
3. Approval of meeting minutes of the October 12, 2023, November 9, 2023, and January 11, 2024
4. Overview of the Budget and Rates Calendar – Christina Curran
5. ES Permits and Other Regulatory Requirements – Kurt Fremont
6. Commissioner Other Items of Interest
7. Adjournment



# Environmental Services Commission

## Minutes

[www.cityoftacoma.org](http://www.cityoftacoma.org)

Center for Urban Waters – 325 E D St  
Zoom Meeting

October 12, 2023

Chair Beaumier called the meeting to order at 4:04 p.m.

Commission Members Present: Bruce Martin, Erich Sachs, Grant Middleton, Chad Sutter, Matthew Benedict, Mindi Keller, Karen DiNicola, Jeff Paradise, and \*Esther Beaumier.

Commission Members Absent: Marty Campbell, \*Richard Doenges, Alex Harman, and Rachael Laitila.

### Public Comment

*The public comment period is reserved for items on the current agenda only. Comments will be limited to the amount of time announced by the chair, presiding officer, or staff liaison, no more than five minutes per person per meeting.*

No Public Comment was received.

Commissioner DiNicola noted she has gathered a variety of feedback from citizens over the summer and asked the best way to present those comments to the commission. Discussion followed regarding the most productive way to share the information; potentially a future agenda topic, transmit it to staff to share with the Commissioners, adding a separate agenda item to future meetings regarding other items of interest. Mr. Fremont noted they can explore options to ensure the information gets shared with the Commission.

### Budget Review

Christina Curran, ES Rates & Budget, provided background on the ES Budget 101 training initiative, noting it started in mid-2018 and is mandatory for all ES employees. She also stated that there is an ES Budget 201 training available to staff that drills deeper into our budget process. She began by providing an overview of ratepayer demographics, why it is important to consider this when looking at the budget, and how Tacoma's three utilities compare to Pierce County and the state. She stated our budget drives our rates, what we charge for our services, and the services we can provide, noting this directly impacts the members of our community. There was much discussion with commissioners regarding the graph depicting 2022 residential monthly bill and how Tacoma compares to other jurisdictions.

Ms. Curran reviewed how the utility is funded, which include charges for services, intergov revenues, miscellaneous revenues, and cash balances. She then reviewed expenses and the differed cost categories of those expenses which include capital, personnel services, indirect

costs, debt, external services, taxes, operating expenses, internal transfers, and employee-related costs.

Kurt Fremont, Business Operations Division Manager, reviewed work the commission has done thus far. Commissioner Sutter inquired about the Westrock closure and how that could impact the budget and rates.

There was commission discussion about a desire to understand better what goes into the budget and how it is planned, including which programs are funded and what services are provided. There was a request to go deeper in upcoming presentations than the incremental changes between biennium budgets, to understand the budget holistically at a deeper level.

### **Adjournment**

The meeting adjourned at 6:03 p.m.



# Environmental Services Commission

## Minutes

[www.cityoftacoma.org](http://www.cityoftacoma.org)

Center for Urban Waters – 325 E D St  
Zoom Meeting

November 9, 2023

Chair Beaumier called the meeting to order at 4:01 p.m.

Commission Members Present: Bruce Martin, Erich Sachs, Grant Middleton, Matthew Benedict, Karen DiNicola, Jeff Paradise (arrived approximately 4:30 p.m.), and \*Esther Beaumier.

Commission Members Absent: Chad Sutter, Mindi Keller, Marty Campbell, \*Richard Doenges, Alex Harman, and Rachael Laitila.

Chair Beaumier stated currently there is not a quorum present, and the approval of minutes will be postponed. Informal discussion ensued while awaiting additional commissioners.

### Public Comment

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No Public Comment was received.

### Wastewater Comprehensive Plan Update

Teresa Dressler and Teresa Peterson, Science & Engineering Division, introduced themselves. Ms. Peterson provided an update on the Wastewater Comprehensive Plan update including the recent stakeholder engagement and results on a broad community survey.

Ms. Dressler showed a Home In Tacoma Introduction Video: <https://www.youtube.com/watch?v=rgTy2q02HIQ>. She then presented an evaluation of impacts to the wastewater system from Home in Tacoma scenarios. The full PowerPoint presentation is attached.

Discussion ensued regarding the following:

1. North End Treatment Plant (NETP) Treatment Capacity
  - a. Commissioner DiNicola expressed concern about NETP having enough treatment capacity.
  - b. Staff indicated NETP has a Re-Rate Study that was submitted to Ecology in 2012 and updated in 2022 that indicates NETP has capacity for future projected growth.

2. Advanced Wastewater Treatment Consideration
  - a. Commissioner DiNicola asked if consideration for advanced wastewater treatment requirements including nutrients as part of the comprehensive planning effort.
  - b. Staff confirmed that advanced wastewater treatment for nutrients was evaluated, but it is not currently a regulatory requirement to be implemented. It was also noted that a more detailed evaluation is required as part of the Puget Sound Nutrients General Permit.
3. Pretreatment Requirements
  - a. Commissioner DiNicola asked about pretreatment requirements including PFAS and pharmaceuticals.
  - b. Staff noted that neither are currently required to be removed or monitored by the City; however, there are ongoing industry discussions about both. The City is participating in an Ecology funded study to better understand PFAS in wastewater and evaluate the feasibility for PFAS removal in wastewater with a developing technology. Staff also noted that there are no widely available treatment technologies for either PFAS or pharmaceuticals in wastewater.
4. Pierce County and neighboring jurisdictions
  - a. Chair Beaumier inquired whether the City is working with Pierce County and other neighboring jurisdictions on potential capacity and increased flow issues.
  - b. Staff confirmed that there are ongoing discussions with Pierce County and other partner agencies to update Interlocal Agreements.

#### **Commissioner Other Items of Interest**

1. Resident Communications
  - a. Commissioner DiNicola stated she has spoken to several residents about rates and regulations.
  - b. Chair Beaumier requested Commissioner DiNicola compile the feedback she received and provide it to staff so they can help assess the best way to respond.
2. NETP Development
  - a. Commissioner DiNicola inquired about how the NETP has been impacted by all the new development in the area.
  - b. Staff indicated the development is within the Re-Rate Study's flow and load capacity for NETP.
3. NETP Storm Concerns
  - a. Commissioner DiNicola expressed concern about NETP's capabilities to handle storm events after a recent visit.
  - b. A conversation occurred about storm events at the NETP and the resulting impacts of flows at the plant. Storm events regionally can cause flows to increase at the treatment plants due to infiltration and inflow in the collection system. ES actively tries to reduce this flow through replacing aging infrastructure.

Kurt Fremont, Business Operations Division Manager, reviewed the upcoming schedule and reminded Commissioners again that next year is a rate year and they have a lot of work ahead of them.

Chair Beaumier noted the presence of a quorum, stating Commissioner Paradise arrived during the presentation. She then asked to move forward with consideration for the approval of minutes.

**Approval of the minutes of the March 9th, April 13th, May 11th, and June 8th meetings**

Commissioner Benedict moved to approve the minutes of the March 9<sup>th</sup>, April 13<sup>th</sup>, May 11<sup>th</sup>, and June 8<sup>th</sup> meetings, as presented. Seconded by Commissioner Sachs. Commissioner DiNicola asked commissioners whether they would like to see future minutes more detailed. Commissioners agreed that staff should try to include more detail in the minutes to capture the “flavor” of the meeting better.

Voice vote was taken and carried. The minutes, as presented, were approved.

**Adjournment**

The meeting adjourned at 5:23 p.m.



# Environmental Services Commission Minutes

[www.cityoftacoma.org](http://www.cityoftacoma.org)

Center for Urban Waters located at 326 E D St, Tacoma, WA and via Zoom Meeting

January 11, 2024

Chair Beaumier called the meeting to order at 4:05 p.m.

Commission Members Present: Chad Sutter, Erich Sachs, Mindi Keller, Matthew Benedict, David Dailey, Karen DiNicola, Marty Campbell, \*Richard Doenges, and \*Esther Beaumier.

Commission Members Absent: Grant Middleton, Alex Harman, Bruce Martin, and Jeff Paradise.

## Public Comment

*The public comment period is reserved for items on the current agenda only. Comments will be limited to the amount of time announced by the chair, presiding officer, or staff liaison, no more than five minutes per person per meeting.*

No Public Comment was received.

## Election of Chair and Vice Chair

Kurt Fremont, Business Operations Division Manager, thanked Commissioners Beaumier and Sutter for their service as Chair and Vice Chair last year, noting they did an excellent job. Commissioners held a brief discussion soliciting interest on servicing as Commission Chair and Vice Chair for 2024.

Commissioner DiNicola moved to elect Commissioner Beaumier as Chair and Commissioner Sutter as Vice Chair. Seconded by Commissioner Sachs. Voice vote was taken and carried. The motion was adopted.

## Review Meeting Schedule and 2024 Work Plan

Mr. Fremont provided an overview of last year's work plan, noting it included some tours and was all about providing commissioners with an understanding of how the three utilities operate. He reminded commissioners if there is interest in any other tours this year to reach out to him. Alan Aplin, Account Relationship Manager, is scheduling a tour for Commissioner DiNicola of the JMK Facility, Commissioner Sutter requested to be included. Mr. Fremont noted he will work to add Commissioner Dailey on the next available tour of the Central Treatment Plant.

Mike Slevin, Environmental Services (ES) Director, provided commissioners a brief history of the commission, remarking it began in 1994 to seek better feedback from rate payers. He then reviewed the 2024 work plan, mentioning it is a standard order we have used for years; however, if the commission would like to add anything please inform staff as soon as possible. He also mentioned that ES funds are their own enterprise funds, our rate process is linked to the General Fund budget process. He stated that there are two ways to look at rates and what is

recommended to the City Council is a revenue percentage not individual rate. He also highlighted that in August the commission will start work on their recommendation letter to the City Council, and in October ES staff will present rates at a study session where all commissioners are welcome to attend. He concluded by stating the hope is that commissioners bring this information to the groups they represent outside of these meetings as part of the rate setting process. There was interest from Commissioners in obtaining a better understanding of the comp plans associated with each of the utilities. Staff agreed to adjust the work plan and future presentations to include this information.

### **Review Commission Role and Purpose**

Director Slevin reviewed the purpose of the commission defined in the Commission Charter:

*“The purpose of the Environmental Services Commission is to review and make recommendations to the City Council, City Manager, and City staff on wastewater, surface water, and solid waste rates, rate structures, services, policies, and programs developed by Environmental Services. Commission members will consider the environment, equity, cultural and economic responsibilities, and the duties, obligations and limitations under state, federal and local laws and regulations.”*

Commissioner DiNicola requested he also read the responsibilities of the Commission:

*“The Commission shall review, advise, and make recommendations to City Council, City Manager and City staff regarding changes to the following programs, services, policies, rates, or rate structures proposed by Environmental Services:*

- a) Residential and commercial utility programs and services.*
- b) Short-term and long-range planning.*
- c) Environmental Services rates, rate structures and rate assistance programs.*
- d) Capital Investment Program and financing structures; and*
- e) City of Tacoma policies directly related to Environmental Services utility functions.*

*Members shall be expected to consider the full interest of their customer class and report Commission discussion back, where appropriate.”*

Director Slevin stated the goal is to only raise rates by what is necessary to meet expectations. He showed commissioners ES Financial Policy Statement, and pointed out Section I.B. that mentions the commission:

*“ESD will solicit comments and feedback from the Environmental Services Commission (ESC) as a part of the rate-setting process before developing final rate recommendations.”*

Commissioner Sutter inquired how capital projects are viewed in the bonding process. Director Slevin discussed ES's bond rating and bonding process, and how capital projects are managed. He then noted that Moss Adams presents their audit finding to the commission, but if there were interest, he would look into having bond counsel present to the commission as well.

Commissioner DiNicola inquired what the comp plans are for the three utilities, noting she feels uncomfortable asking about rates without knowing more about the comp plans and how they all come together. She then requested staff provide a chart of the different comp plans and where we are at with each. Director Slevin noted ES has a comp plan for wastewater and stormwater, but Solid Waste is part of the regional Tacoma-Pierce County Solid and Hazardous Waste Management Plan. Discussion ensued regarding future plans for solid waste after the contract with LRI expires in 2030, rail vs. barge, where the garbage will go, whether the City could ever deviate from the County, and how Pierce County Solid Waste Advisory Committee (SWAC) and the Environmental Services Commission align.



**Commissioner Other Items of Interest**

Director Slevin provided a litigation update, stating there were two lawsuits relating to regulatory issues. The Stormwater MS4 permit was correct, and the court supported the City. The Nutrient General Permit was successfully challenged in superior court, successful at appellant court, and the appeal to the Pollution Control Hearing Board is in a stay. Commissioner Sutter inquired who pays for legal fees. Director Slevin stated they are paid for by rates. Commissioner Keller inquired about the MS4 permit challenges.

Cassandra Moore, Environmental Compliance ADM, mentioned she is coordinating a stormwater inspection ride-along for Commissioner DiNicola.

Discussion followed about recycling and Call-2-Haul for multi-family residence.

**Adjournment**

The meeting was adjourned at 5:14 p.m.



# Budget Process Overview



\*Internal proposal development occurs before



# Rates Process Overview

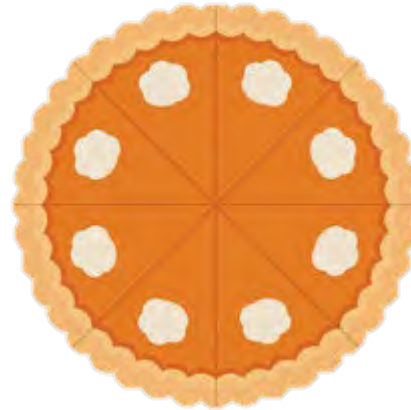
## How Big is the Pie?



### 1. Revenue Requirement

Identifies revenues needed to sustain operations, according to financial plan (i.e. budget)

## How to Slice the Pie?



### 2. Cost of Service

Divides revenue into total amount to be paid by each customer class (seeks equity)

## How to Build Each Piece?



### 3. Rate Design

Sets rate structure to collect revenue from each customer in each class



# Rates Scenario Planning



ESC July 11

## 2025-2026 Baseline

- Budget based on new baseline established
- Prior year snapshot for other items

## 25-26 Baseline with ES Proposal Plugs

- Can we afford desired budget changes?
- Customer impact
- Updated CIP

## 25-26 Proposed Budget – SAP Data

- All 25-26 plugs replaced with budgeted information
- Rate model equals SAP

ESC June 13

## 25-26 Baseline with ISF Proposal Plugs

- Updated costs from approved budget changes for internal service providers
- Updated CIP

ESC Sept. 12

## 25-26 Proposed Budget

- Proposal decisions included
- Updated labor and benefits
- Final CIP plan

# 2024 Calendar for 2025-2026 Key Meeting Dates

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## Key Meeting Dates

January 11	ESC – election, meeting schedule, commission purpose
February 8	ESC –rate and budget timeline,ES permits and regulatory requirement
March 14	ESC – Long-term plans and future challenges
April 11	ESC – 2023 year-end financials, overview of all three utilities
March	Budget Proposal kick-off and City Manager budget priorities
May 9	ESC – capital improvement programs for all three utilities
June 2	City Council forecast presentation
June 13	ESC – rate model baseline budgets for all three utilities
April-May	Internal service fund providers budget proposal meetings with OMB and CM
June-July	Non-ISF department budget proposal meetings with OMB and CM
July 11	ESC – rate model baseline plus anticipated <u>budget proposals</u> – high-level projections
July TBD	MPS review proposals with City Manager
August 5	Agenda memo and PPT to GPFC is due
August 8	ESC – initial budget and rate revenue projection, rate model demo
August 20 10 a.m.	GPFC – ESD Preliminary Budget and Overall Revenue Increase
August 30	Agenda memo to GPFC is due
September 12	ESC – final budget and rates, draft recommendation letter
September 17 10 a.m.	GPFC – ESD Proposed Budget and Rates Presentation [TENTATIVE]
September 17 – September 23*	Mike meets with City Council members.
September - October	Rolling deadlines to prepare for work session presentations
September 19	ESC – if needed, based on concerns, finalize recommendation letter
September 24	Proposed budget presented to City Council by City Manager
October 1 or 8	City Council Study Session – ESD Budget and Rates Presentation
October 7 or 14	Agenda memos for Rates Ordinances and Public Hearing is due
November 1	1st Public Hearing on 2021-22 Operating and Capital Budgets & Utility Rates (ESD + TPU)
November 8	2nd Public Hearing on 2021-22 Operating and Capital Budgets and Utility Rates (ESD + TPU)
November 14	ESC –budget adoption process overview
November 12	1st Reading of 2025-26 Operating and Capital Budget Ordinance and All Utility Rates
November 19	2nd Reading of 2025-26 Operating and Capital Budget Ordinance and Rate Ordinances
December 1	2019-20 Biennium-end modifications – 1st reading
December 8	2019-20 Biennium-end modifications – 2nd reading
December 12	ESC – 2025 work plan



# Solid Waste Management – Regulatory Compliance

Environmental Services  
Commission

February 8, 2024



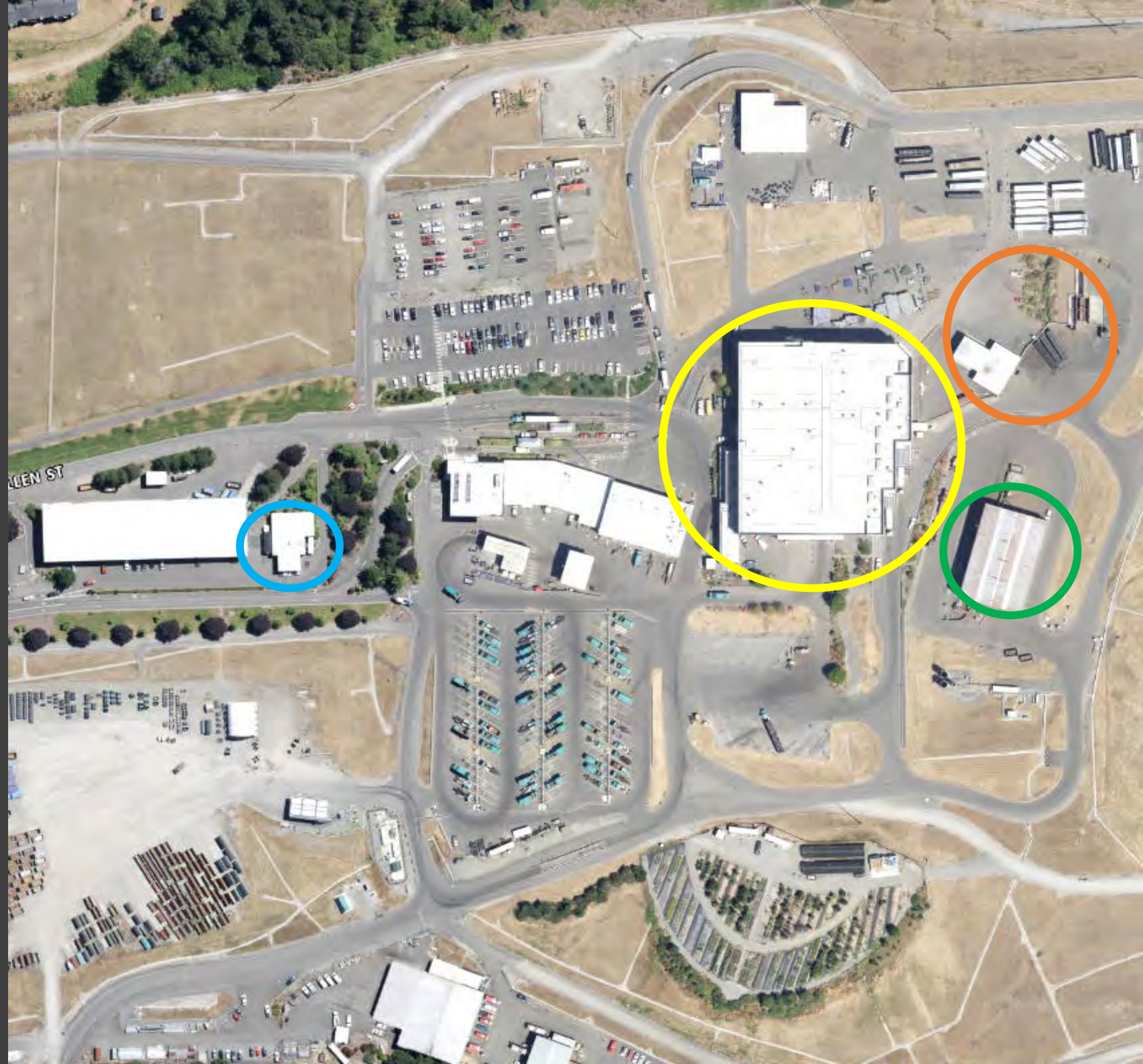
**HEALTHY  
NEIGHBORHOODS**  
+  
**THRIVING PUGET  
SOUND**

=

**A BETTER  
TACOMA**

# Solid Waste Permit - Health Department

- Covered operations
  1. Main Receiving Building (garbage)
  2. Public Receiving Area (Organics)
  3. South Compactor (Organics)
  4. Household Hazardous Waste Facility (Household chemicals)
- Operations Plan - Staffing, equipment and procedural requirements
- Requires Stormwater Permit
- Weekly and Annual Inspections





# Health Department Annual Permit Renewal for the Recovery & Transfer Center (RTC)

- The inspection was successful
- Thank you to everyone operating and maintaining our site!
- Opportunities for continued improvement were identified
- The inspector said **our onsite operations and facilities were the leader for transfer and recycling stations in the region!**

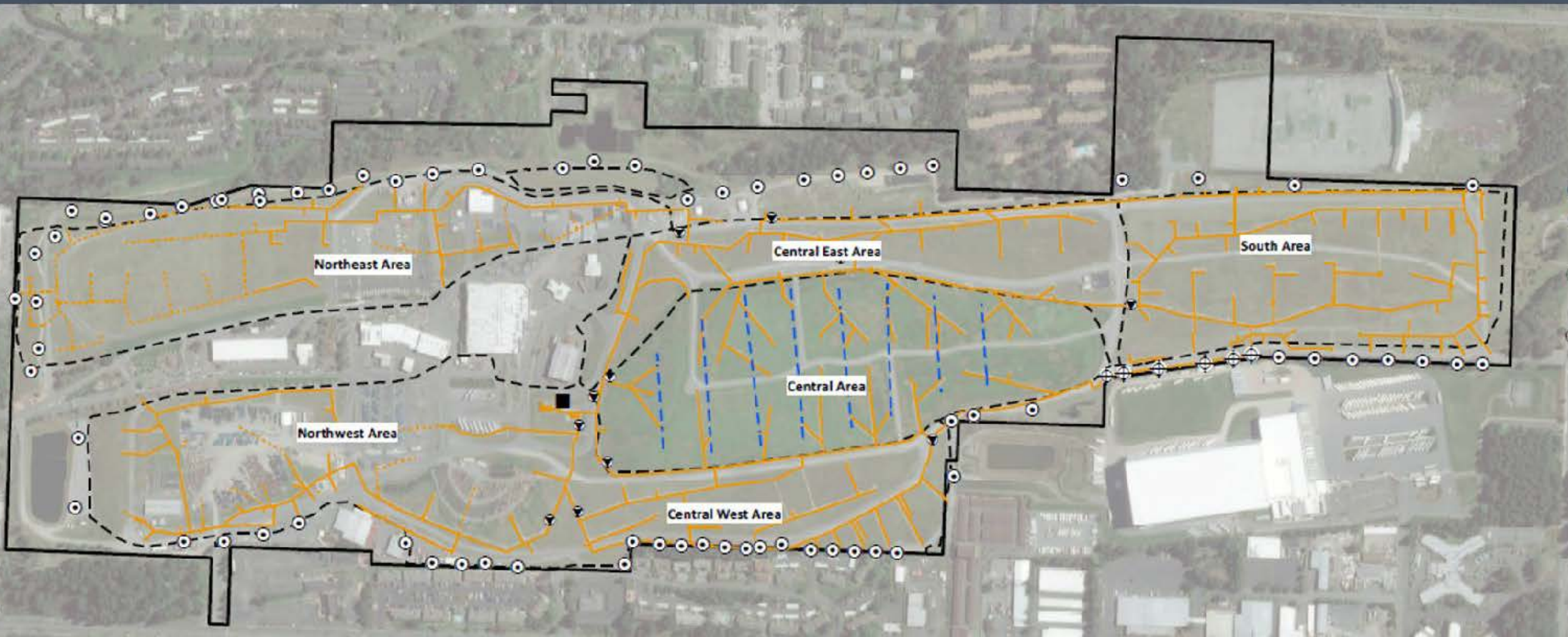


# Consent Decree and Landfill Post Closure Care

- Superfund Site
- Land Use Restrictions/Landfill Closure Plan
- Operations, Maintenance and Monitoring of Environmental Systems
  - Cap
  - Groundwater
  - **Landfill Gas and flare**
  - Cap
  - Leachate & Condensate

# Consent Decree and Landfill Post Closure Care

## Landfill Gas and Flare System



# Consent Decree and Landfill Post Closure Care

## Landfill Gas and Flare System



# Environmental & Sustainability Management System

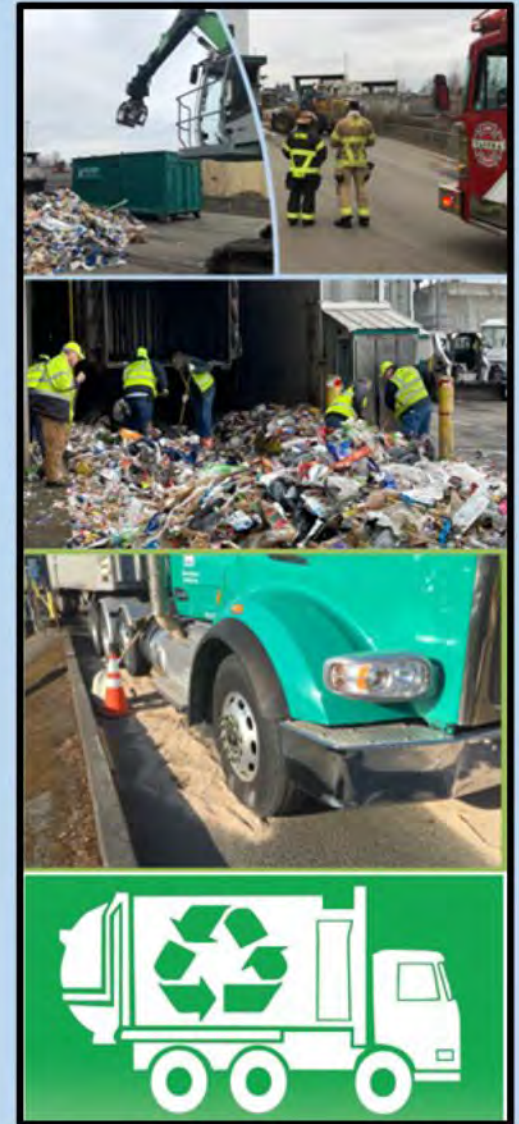
- Environmental Policy
  - Minimize Environmental Impact
  - Compliance
  - Continual Improvement
  - Education & Training
- How We Get There
  - SOPs
  - Corrective Action Reviews
  - After Action Reviews
  - Training System



# 4<sup>th</sup> Quarter Director's Review of ESMS *(Environmental & Sustainability Management System)*

“We are making great progress in our environmental efforts – for example, Solid Waste has reduced spills by 30% and significantly decreased trailer fires. Our ESMS System is working, and I thank all employees for your efforts each day to protect our environment!!!”

-Director Mike Slevin



# Solid Waste Management – Regulatory Compliance



• • • Thank you



Questions?





# Agenda

- Industrial Pretreatment Regulations
- Wastewater Treatment Regulations
- Puget Sound Nutrients General Permit



# Wastewater Regulations

City of Tacoma | Environmental Services Department

**Environmental Services Commission**

**February 8, 2024**





# NETP and CTP





# Industrial Pretreatment Program

City of Tacoma | Environmental Services Department



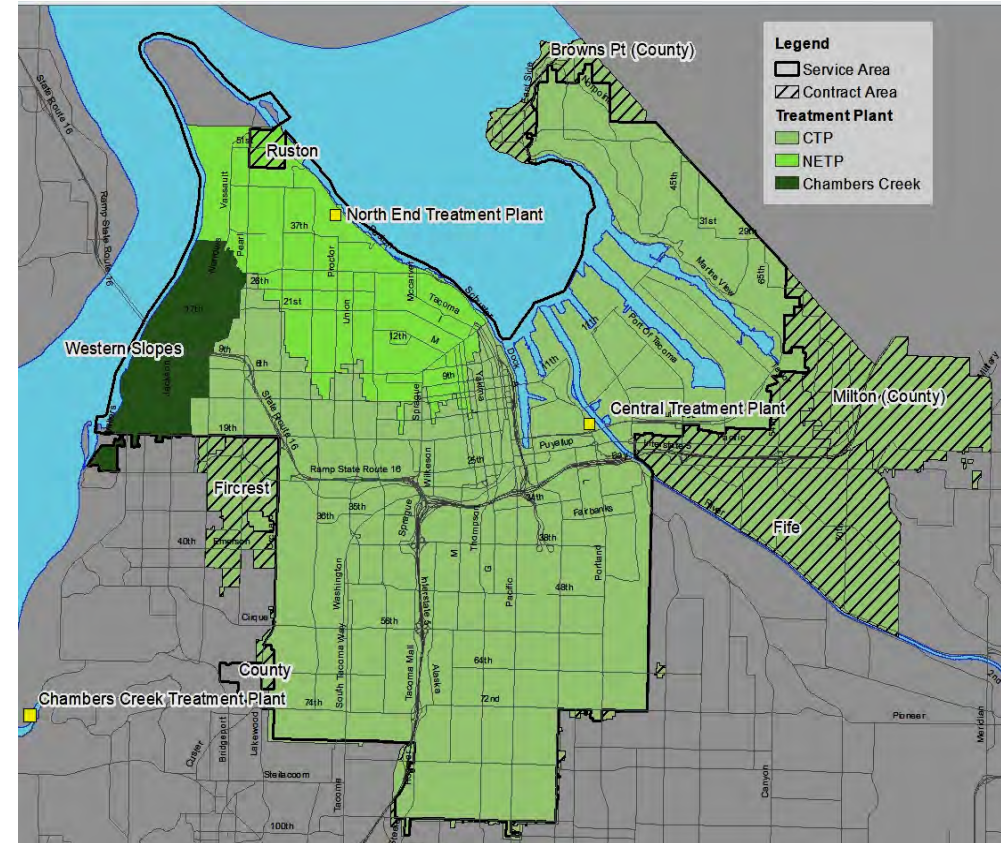


# Industrial Pretreatment Program

- Currently 40 Permitted Facilities
- Special Approved Discharge Program
- User Survey Program
- Hauled Waste Program
- FOG Program
- Dental Program
- Mobile Washer Program
- Interlocal Agreement Area Inspections

# Industrial Pretreatment Program

- EPA delegated authority on 11/30/1984
- State delegation in 10/1994
- Substantial Modification of our Pretreatment Program in 2022:
  - Updated Pretreatment Program Document
  - Updated Hauled Waste Manual
  - Rewrite of Pretreatment Ordinance, Tacoma Municipal Code Subchapter 12.08C
  - Updated Interlocal Agreements with Cities of Ruston, Fife and Fircrest
  - Ecology Approval of Updated Local Limits





# Goals for Industrial Pretreatment Program

- Prevent Interference with Treatment Plant Operations
- Prevent Pass-through of Pollutants to the Puget Sound
- Prevent Municipal Biosolids Contamination
- Prevent Exposure of Personnel to Chemical Hazards



# Wastewater Treatment Regulations

City of Tacoma | Environmental Services Department







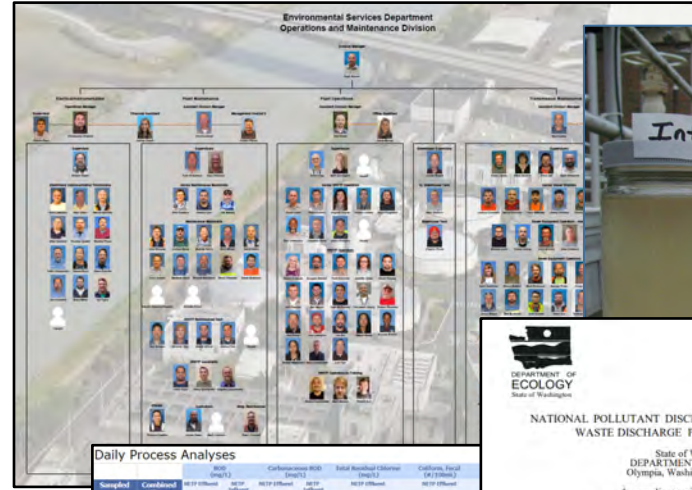
# Washington State Permits

- NPDES Permits:

- CTP: 1
- NETP: 1
  - Sets discharge limits-Water Quality Standards
  - Establishes sampling requirements
  - Defines allowable operations and flows
  - Inspections

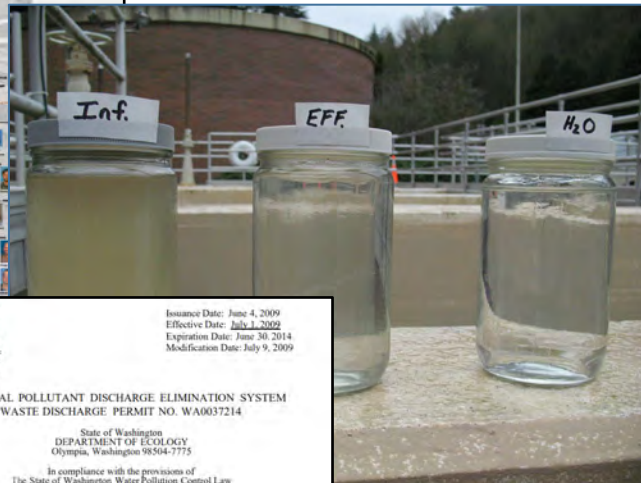
- Compliance Requirements:

- 33 Licensed Operators – Group 4
- 24-hour Staffing for process control
- SOPs – LOTO
- Process Control



Daily Process Analyses

Sampled	Combined Effluent (mgd)	BOD5 (mg/L)		Carbonaceous BOD5 (mg/L)		Total Suspended Solids (mg/L)		Carbon, Total (mg/L)
		NPDES Effluent	NPDES Effluent	NPDES Effluent	NPDES Effluent	NPDES Effluent	NPDES Effluent	
8/17/2009	3.3	12.00	200.00			0.00		4.00
8/18/2009	3.8	16.00	200.00			0.00		12.00
8/19/2009	3.4	11.70	200.00	20.60	100.00	0.00		15.00
8/20/2009	3.4					0.11		15.00
8/21/2009	4.2					0.00		144.00
8/24/2009	4.3					0.24		2.00
8/27/2009	3.9	10.30	200.00	7.50	140.00	0.10		4.00
8/30/2009	3.9	10.00	210.00			0.23		2.00
8/31/2009	3.6	9.10	210.00	6.00	140.00	0.10		10.00
9/01/2009	3.4	6.80	210.00			0.10		1.00
9/02/2009	3.9					0.11		24.00
9/03/2009	3.5					0.08		400.00
9/04/2009	3.2					0.10		30.00
9/05/2009	3.0	10.20	130.00			0.26		1.00
9/06/2009	4.4	9.40	220.00	8.20	130.00	0.10		1.00
9/07/2009	3.2	9.80	200.00	7.50	140.00	0.10		2.00
9/08/2009	3.0	10.40	200.00			0.10		1.00
9/09/2009	3.6					0.16		6.00
9/10/2009	3.4					0.17		3.00
9/11/2009	3.0					0.13		6.00
9/12/2009	3.6	10.40	240.00			0.22		3.00
9/13/2009	3.4	9.00	210.00	9.20	190.00	0.14		1.00
9/14/2009	3.0	9.10	220.00	6.40	210.00	0.12		2.00
9/15/2009	3.5	7.20	240.00			0.13		7.00
9/16/2009	3.4					0.10		1.00
9/17/2009	3.4					0.12		11.00
9/18/2009	3.4					0.14		4.00
9/19/2009	3.3	11.00	240.00	8.00	180.00	0.23		3.00
9/20/2009	3.3	11.20	270.00			0.20		2.00
9/21/2009	3.3	11.00	300.00	6.10	200.00	0.10		2.00
9/22/2009	3.3	10.00	310.00			0.10		2.00
9/23/2009	3.3	10.00	310.00	6.10	190.00	0.10		2.00
9/24/2009	3.3	10.00	310.00	6.10	190.00	0.10		2.00



DEPARTMENT OF ECOLOGY  
State of Washington

ISSUANCE DATE: June 4, 2009  
EFFECTIVE DATE: July 1, 2009  
EXPIRATION DATE: June 30, 2014  
MODIFICATION DATE: July 9, 2009

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
WASTE DISCHARGE PERMIT NO. WA0037214

State of Washington  
DEPARTMENT OF ECOLOGY  
Olympia, Washington 98504-7775

In compliance with the provisions of  
The State of Washington Water Pollution Control Law  
Chapter 90.48 Revised Code of Washington  
and  
The Federal Water Pollution Control Act  
(The Clean Water Act)  
Title 33 United States Code, Section 1251 et seq.

City of Tacoma  
North End Wastewater Plant No.3  
2201 Portland Avenue  
Tacoma, WA 98421-2711

Plant Location:  
4002 North Waterview Street  
Tacoma, WA 98407-5706

Receiving Water:  
Oyster Commencement Bay

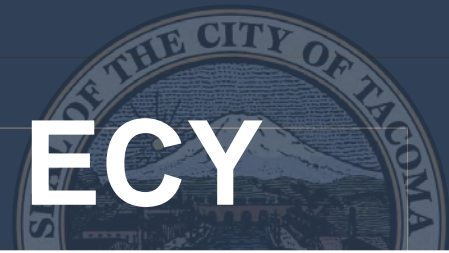
Water Body ID No.:  
Old ID # WA-10-0010, New ID # 47122C418

Discharge Location:  
Latitude: 47° 17' 16" N  
Longitude: 122° 29' 00" W

Plant Type:  
Physical Chemical with a biological tower and chlorine disinfection

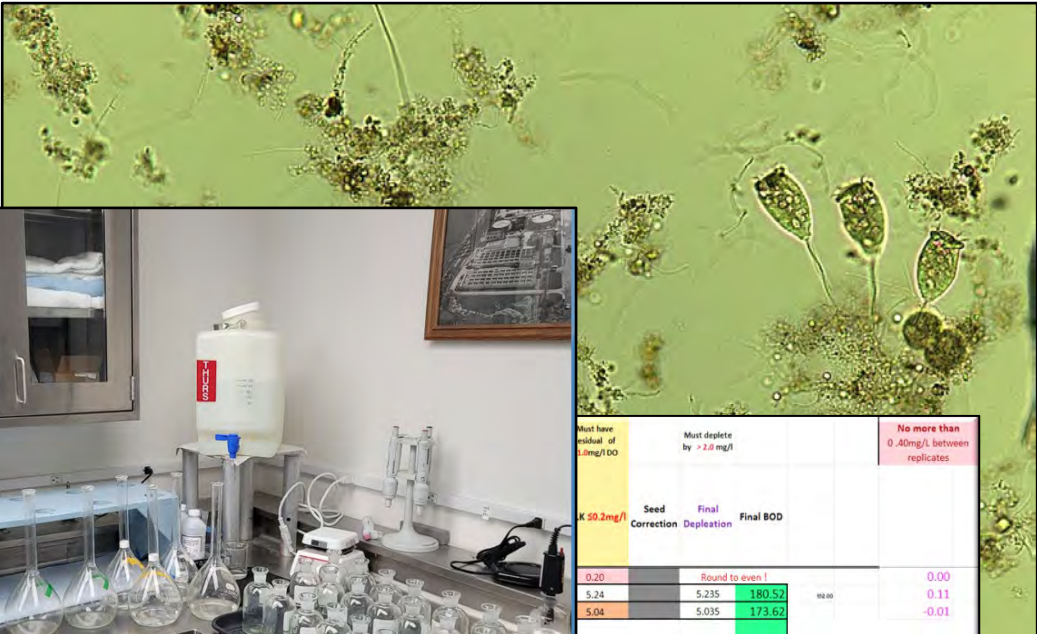

is authorized to discharge in accordance with the special and general conditions that follow:





# Laboratory Accreditation - ECY

- Wastewater Labs:
  - CTP: 1
  - NETP: 1
    - Micro exams – Process Control
    - Performs Sampling and Analysis
    - Hourly, Daily, Bi-weekly, Weekly, Bi-monthly, Monthly, Quarterly, annual sampling requirements.
- Compliance Requirements:
  - Licensed Operators – Group 1
  - QA/QC, Standard Methods
  - Lab Audits, Performance Testing

Must have residual of 1.0mg/100		Must deplete by > 1.0 mg/l		No more than 0.40mg/L between replicates	
K 50.2mg/l	Seed Correction	Final Depletion	Final BOD		
0.20		Round to even 1			0.00
5.24	5.235	180.52	180.52	0.00	0.11
5.04	5.035	173.62	173.62	0.00	-0.01
5.08	0.524	4.552	227.58	0.00	0.01
5.25	0.504	4.742	237.08	0.00	-0.01

Lab	Strain	INF Comp	Eff comp	dup	cod	INF Comp	Eff comp	dup	cod	INF Comp	Eff comp	dup	cod	INF Comp	Eff comp	dup	cod
73	10	1	9.00	7.40	7.38	7.39	1.61	1.610	161.00	161.00	161.00	161.00	161.00	161.00	161.00	161.00	161.00
73	20	2	8.80	5.30	5.40	5.35	3.45	3.450	172.50	172.50	172.50	172.50	172.50	172.50	172.50	172.50	172.50
73	40	4	88.00	5.30	5.50	5.40	82.60	82.600	2065.00	2065.00	2065.00	2065.00	2065.00	2065.00	2065.00	2065.00	2065.00
90	20	2	8.80	5.10	5.10	5.10	3.70	3.700	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00	185.00
10	1	1	9.00	7.40	7.38	7.39	1.61	0.524	1.087	108.65	108.65	108.65	108.65	108.65	108.65	108.65	108.65
200	20	20	8.90	5.90	5.80	5.85	3.05	0.524	2.527	12.63	12.63	12.63	12.63	12.63	12.63	12.63	12.63
200	20	20	8.90	5.80	5.60	5.70	3.20	0.524	2.677	13.38	13.38	13.38	13.38	13.38	13.38	13.38	13.38
100	10	10	9.00	0.12	0.11	0.12	8.89	0.504	8.382	83.82	83.82	83.82	83.82	83.82	83.82	83.82	83.82

# Washington State Permits



- Stormwater Permits:
  - CTP: 1
    - Sets discharge limits-Water Quality Standards
    - Establishes sampling requirements
    - Stormwater Pollution Prevention Plan
- Compliance Requirements:
  - Monthly inspections
  - Quarterly Sampling
  - Reporting Spills (ERTS)
  - Immediate Spill response

**ERTS Incident #728353**  
Environmental Report Tracking - Generated 1/29/2024, 10:31 AM

**Primary Initial Report - Reported: 01/28/24 11:16**  
Reference ID - 219283

Where did it happen?	How was it reported?
Location name:	Intake type: Email
Physical address: 3939 Ruston Way Tacoma WA 98402 US	Reported date: 01/28/24 11:16
County: Pierce	Entered by: Joe Thomas
Ecology region: S	Entered at: 01/29/24 10:30
Lat, long: 47° 11' 47.00" N, 122° 30' 00.00" W	
Directions/Landmarks:	

**What happened?**

A map showing the incident location in Tacoma, WA. The map features a red shaded area representing the incident site, with a network of green and red lines indicating the reporting path. A blue line represents a water body. The map includes various labels such as "04157", "04158", "04159", "04160", "04161", "04162", "04163", "04164", "04165", "04166", "04167", "04168", "04169", "04170", "04171", "04172", "04173", "04174", "04175", "04176", "04177", "04178", "04179", "04180", "04181", "04182", "04183", "04184", "04185", "04186", "04187", "04188", "04189", "04190", "04191", "04192", "04193", "04194", "04195", "04196", "04197", "04198", "04199", "04200".



# ●●● Washington State Permits

- Biosolids Permit: - TAGRO
  - CTP: 1
  - NETP: 1
    - Sets Rules and standards for soil management
    - Establishes sampling requirements
    - Handling and treatment guidelines
- Compliance Requirements:
  - Regular Sampling
  - Time and Temperature – pathogen reduction
  - Distribution requirements – bagging and mixing.





# ESMS – ISO 14001:2015

- Environment and Sustainability Management System:
  - CTP and NETP
  - Continuous Improvement
- Compliance Requirements:
  - Internal and External Audits
  - Weekly, Monthly coordination meeting
  - Evaluation of Compliance Audits
  - Opportunities for Improvement
- Key Environment Aspects
  - Energy conservation
  - Resource consumption
  - Water re-use



Subject Area	Compliance	Effectiveness of Controls (%)	Final Impact Score
Laboratory	71 21 21 41 11 11 4	100	428
Fleet Vehicles	41 1 5 5 8 1 2 1	80	188
Decant Facility	2 1 1 5 5 2 2 8	90	240
Warehouse <i>includes consumable supplies</i>	41 4 3 5 6 4 3 7	90	87
Maintenance Shop	1 1 1 1 1 3 4 4	80	90
Buildings	1 1 1 1 3 1 6 6	80	20
Stormwater	1 1 1 1 1 3 1 3	95	63
Site Security	1 1 1 1 1 1 8 8	100	12
Irrigation & Landscaping	4 1 4 5 3 1 1 1	80	165
Plant Influent	4 1 4 5 3 3 3 1	70	114
Screening	2 1 6 6 1 8 1 1	80	60
NIPS & OIPS		80	116

Requirement	Compliance	Effectiveness of Controls (%)	Final Impact Score
41 CFR 411 - Permit/Plan Program Requirements	Prohibits requirements for designed permit programs		
41 CFR 412 - Resource Protection (including Contaminant Release)	Prohibits requirements for water and discharge regulations. This program has been designed to meet these goals		
41 CFR 413 - National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and other organizational structures and procedures for preparing for and responding to discharge of oil and hazardous substances, pollutants, and contaminants	Requires the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and other organizational structures and procedures for preparing for and responding to discharge of oil and hazardous substances, pollutants, and contaminants		
41 CFR 414 - Designation, Requirements, Qualities, and Installation	Designates "National Substations" under CERCLA, identifies responsible agencies for these substation as well as for OPR, "Applicable substation", and sets forth the installation requirements for release of these substation.		
41 CFR 415 - Addition, Protection by, Small Spillage, and Reporting Criteria	Prohibits any person from conducting the fabrication of EPA emergency control panel under section 107 of CERCLA.		
41 CFR 416 - Requirements to Local Government for Emergency Response to Incidents	Sets up procedures for EPA to institute local government to conduct emergency response. Local government may request EPA to assist in the design, installation, testing, and maintenance of emergency response to hazardous materials releases.		
41 CFR 417 - Emergency Planning and Notification	Establishes the role of authority, identifies substation, identifies existing facilities, and facility facilities (operational) necessary for the development and implementation of site and local emergency response plans.		
41 CFR 418 - Reporting Requirements	Establishes reporting requirements which provide the public with important information on the hazardous chemicals in their communities for the purpose of planning a coordinated response to chemical releases and facilitating identification of site and local emergency response plans.		
41 CFR 419 - Final Chemical Release Reporting	Requires local government to report releases of hazardous materials to the release of these chemicals under RCRA Title III.		

# Puget Sound Clean Air Agency

- PSCAA Permits:
  - CTP: 3
  - NETP: 1
- Treatment Plants
  - Process Areas
  - Odor Control
  - Flares
- Compliance Requirements:
  - Notice of Construction
  - Certified Staff Inspections (Weekly, Monthly)
  - O&M Records





# **Puget Sound Nutrients General Permit**

City of Tacoma | Environmental Services Department



# ● ● ● Puget Sound Nutrient General Permit



- Dissolved Oxygen: Total Inorganic Nitrogen
- Only covers WWTPs in Puget Sound
- Effective: January 1, 2022
- Three Categories of Dischargers:
  - Dominant (CTP)
  - Moderate (NETP)
  - Small







# ● ● ● PSNGP Compliance Requirements



- Sampling: Influent, Effluent, & Industrial
  - Nitrogen
- Optimization with Existing Infrastructure
- Action Levels
  - Based on Historical Data
  - Corrective Action: 10% Reduction
- Nitrogen Optimization Plan – Annual Report
- Nutrient Reduction Evaluation
  - 3 mg/L Total Inorganic Nitrogen Seasonal Limit
  - AKART Evaluation
    - WAC Defined – reasonable defined
    - Site and Utility Specific

• • • Thank you



Questions?



# Stormwater Regulations

City of Tacoma | Environmental Services

**Environmental Services Commission**

**February 8, 2024**

**Overview of Regulations**





# Stormwater Regulations Overview

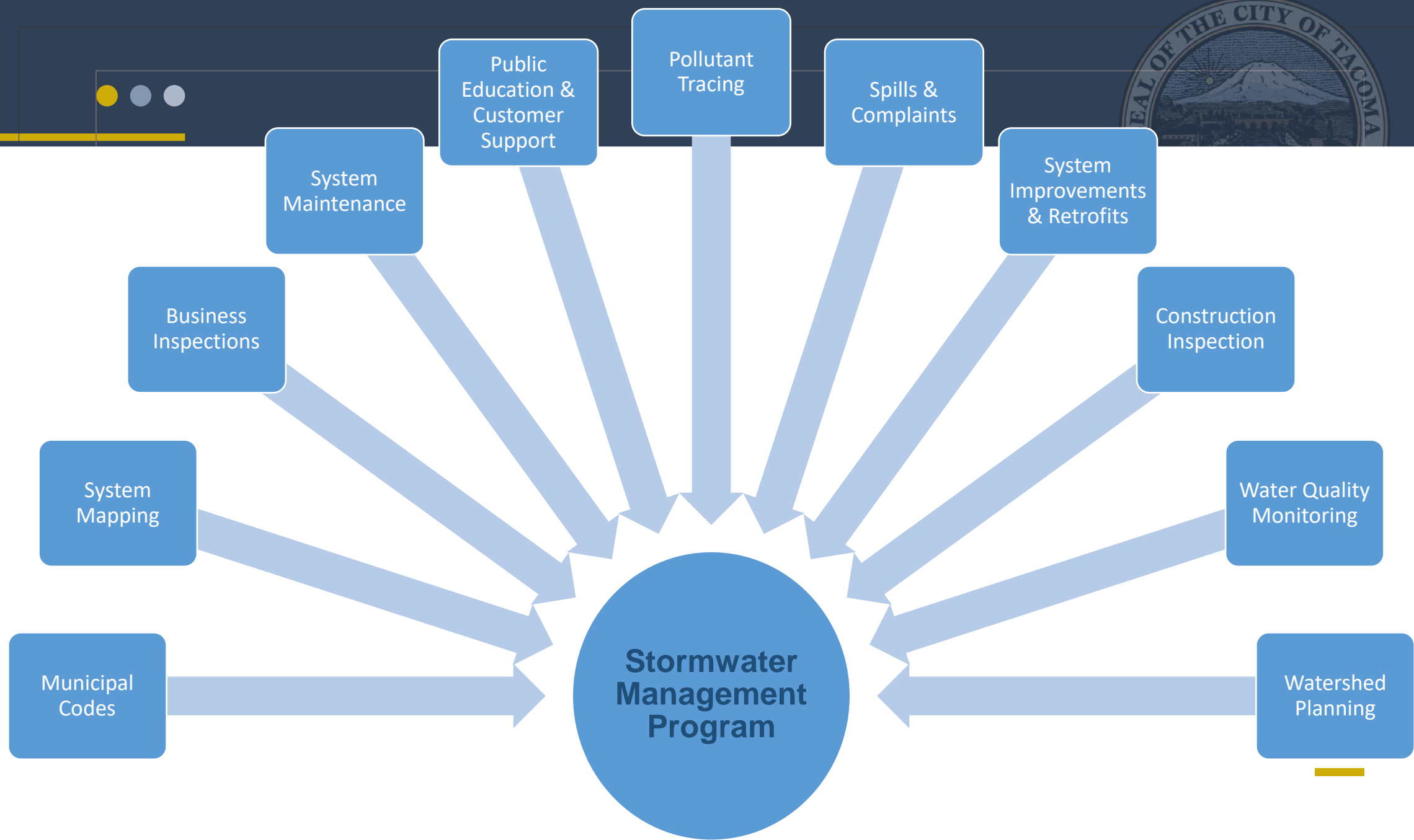
- **City of Tacoma** has a Phase 1 National Pollutant Discharge Elimination System (NPDES) **Stormwater Permit** from the Washington State Department of Ecology issued under the Federal **Clean Water Act**.
- Ecology Underground Injection Control (UIC) Standards
- Thea Foss Waterway Stormwater Work Plan
- EPA/Tribal Waters NPDES Permit to be issued in 2-5 years

**City of Tacoma** has a Phase 1 National Pollutant Discharge Elimination System (NPDES) **Stormwater Permit** from the Washington State Department of Ecology issued under the Federal **Clean Water Act**.



**The permit requires Tacoma:**

- **To reduce pollution carried by stormwater**
- **To protect our receiving waters – freshwater, marine water and groundwater**





# ● ● ● City's Stormwater Management Manual

## Best Management Practices for Stormwater:

- Source Control
- Low impact Development design &
- Stormwater Flow Control/Treatment Design



## Ecology Underground Injection Control (UIC) Standards

## Best Available Science for Stormwater Treatment

- Technology Assessment Protocol – Ecology (TAPE)
- Ecology Stormwater Action Monitoring Studies
- Recent Effectiveness Studies
  - Stormwater Treatment of Tire Contaminants
  - Guidance on Using New High Performance Bioretention Soil Mixes





# • • • Thea Foss Superfund Requirements

- 1983 - Declared a Superfund Site
- 1994 - City Signs AOC for Remedial Design
- 1994-2001 – Development of cleanup plan
- 2003-2006 Consent Decree cleanup performed
- **2001: City/EPA/Ecology Stormwater Work Plan**
- **Ongoing: Stormwater monitoring under Stormwater Work Plan Addendum**
- 2022 – EPA initiated process to delete the waterway from National Priorities List (timing unknown)
- Ongoing: Long Term Monitoring Plan (next in 2028)

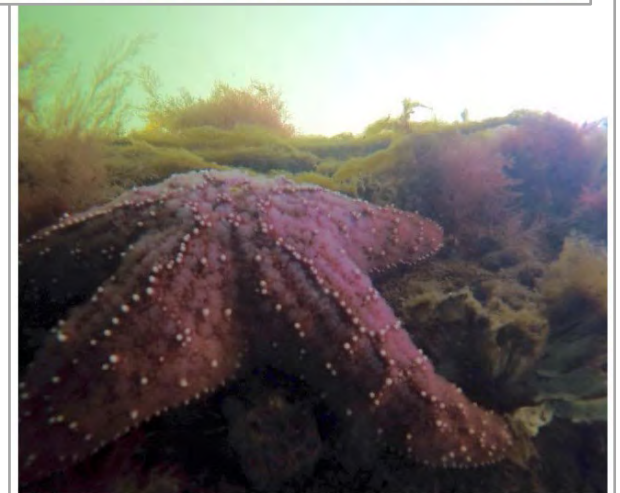
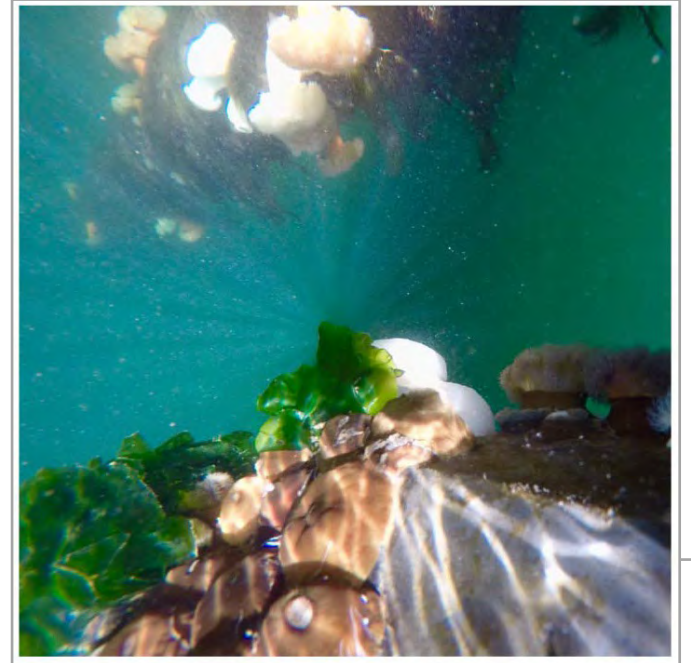




# Stormwater workplan

## Consent Decree and NPDES

- Stormwater monitoring performed under Ecology Phase 1 NPDES Permit
- Stormwater Work Plan Addendum included as part of the Remedial Action Consent Decree ties ongoing monitoring to sediment cleanup
- Annual reports each March 31st as part of NPDES report and includes Source Control Work Plan for following year





# New EPA Stormwater Permit

- Permitting stormwater discharges to Tribal waters
  - Outfalls on the Puyallup River, Blair Waterway and Marine View drive
- EPA are working to issue permit in the next 2-5 yrs
- Issue and effective dates are not currently known
- EPA has been working with Ecology on similar permit elements but may not be the same
- Joint authority between EPA and Puyallup Tribe
- This may result in some implementation and reporting changes



# Surface Water Utility

We believe everything we do supports healthy neighborhoods and a thriving Puget Sound, leaving a better Tacoma for all



HEALTHY NEIGHBORHOODS  
+  
THRIVING PUGET SOUND  
=  
A BETTER TACOMA

••• Thank you



Questions?