Clean Water Services

**DATE:** November 1, 2021

**TO:** Clean Water Services Advisory Commission Members
and Interested Parties

**FROM:** Mark Jockers, Chief of Staff

**SUBJECT:** **REMINDER AND INFORMATION FOR NOVEMBER 10, 2021, CWAC MEETING**

This is a reminder that a Clean Water Services Advisory Commission (CWAC) meeting is scheduled for **Wednesday, November 10, 2021.**

In support of best practices for preventing the spread of the coronavirus, CWS has adopted the following format for the November meeting:

- The meeting will be held virtually using the Webex platform.
    - Webex offers the option to connect to video, slides and audio via a device with internet access, or an audio-only connection through any telephone line.
    - CWAC members should watch for an email containing Webex connection details.
    - Interested parties should register for this meeting by November 9 by following the instructions on the website.
- The meeting will begin at 5:30 p.m. Please plan to establish your connection to the meeting 10-15 minutes before the start time to allow the meeting to begin promptly.
- Dinner will not be provided.

The CWAC meeting packet will be mailed to Commission members on Monday, November 1, and posted to the CWAC section of the Clean Water Services' website.

Please call or send an email to Stephanie Morrison (morrisons@cleanwaterservices.org; 503.681.5143) by November 9 to advise about your attendance at this meeting.

Enclosures in this packet include:

- November 10 Meeting Agenda and Materials
- June 9 Meeting Notes

# Clean Water Services Advisory Commission

**November 10, 2021**

**AGENDA**

**5:30 p.m.** **Welcome & Introductions**

**5:40 p.m.** **Recognition of Outgoing Commission Members**

- Mark Jockers, Chief of Staff

**5:50 p.m.** **Review/Approval of Meeting Notes of June 9, 2021**

**5:55 p.m.** **NPDES Permit Application Status and Update**

In December 2020, CWS submitted a renewal application for its watershed-based NPDES permit, which expired on May 31, 2021. Previous presentations on this topic were provided to the Commission in October 2020 and June 2021. This presentation will provide an update on the status of discussions with DEQ and the anticipated schedule for the permit.

- Bob Baumgartner, Regulatory Affairs Director

Requested Action: *Informational and discussion*

**6:30 p.m.** **Local Limits**

The CWS Industrial Pretreatment Program develops local limits for industrial discharge of specific chemicals to our sanitary system to keep workers safe and protect water quality, infrastructure investments, and the biological processes at treatment facilities. Staff provided a presentation to the Commission in April 2021. CWS has received tentative approval of the proposed limits from DEQ pending the public comment period.

- Joy Ramirez, Environmental Services Supervisor
- Bob Baumgartner, Regulatory Affairs Director

Requested Action: *Informational, input welcome*

**7:00 p.m.** **Invitation for public comment**

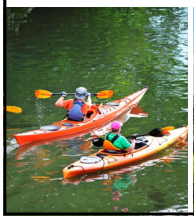
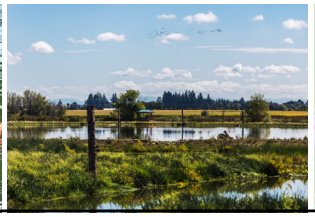
**7:05 p.m.** **Announcements**

**7:10 p.m.** **Adjourn**

**Next Meeting: December 8, 2021**

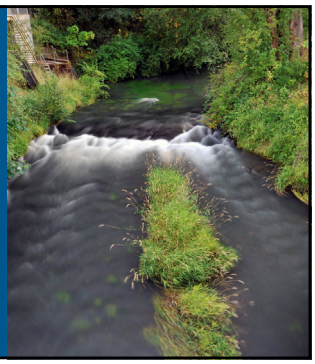
## NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT RENEWAL

November 10, 2021
Clean Water Services Advisory Commission
Bob Baumgartner, Regulatory Affairs Director


## AGENDA

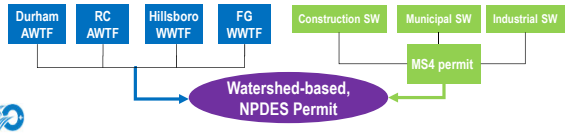
- Background: Watershed-based NPDES permit renewal application
- Integrated Planning approach
- Permit status
- Pathways for collaboration on complex topics
- Outreach and schedule



## CWS WATERSHED-BASED NPDES PERMIT

Includes:

- Permits for four wastewater treatment facilities (WWTFs) and municipal stormwater program
- Water quality trading for temperature
- Shared loads for TSS, ammonia and phosphorus among WWTFs
- Flow-based limits




## COMPLEX PERMIT RENEWAL APPLICATION

Our application includes nine components

TABLE OF CONTENTS

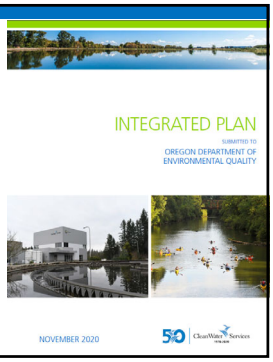
1. Integrated Plan
2. Durham AWWTF Permit Renewal Application
3. Rock Creek AWWTF Permit Renewal Application
4. Hillsboro WWTF Permit Renewal Application
5. Forest Grove WWTF Permit Renewal Application
6. MS4 Permit Renewal Application
7. Outfall Inspection Report
8. Macroinvertebrate Report
9. Ambient Monitoring Data

## OTHER SUPPORTING MATERIALS

- Thermal Load Management Plan (aka Temperature Management Plan)
- Mercury Minimization Plan
- Edits to the permit and supporting documents
- Memo on monitoring reduction
- Strategy to minimize formation of disinfection byproducts
- Flow-based ammonia limits

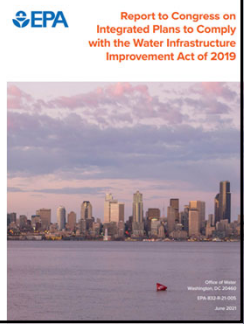
## INTEGRATED PLAN

- Identifies long-term regulatory challenges we face
- Communicates goals to regulators and stakeholders
- Describes alternative strategies and activities to achieve the goals
- Complements other planning efforts



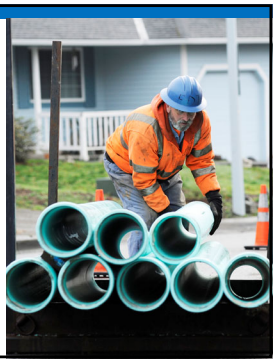
## INTEGRATED PLAN: EPA REPORT

- From the June 2021 EPA report on Integrated Planning to Congress:
  "As municipalities continue to improve their clean water infrastructure, they must successfully navigate and address issues, such as changing rainfall patterns and intensities, population growth and expanding service areas, aging infrastructure, competing priorities for public funds, and increasingly disparate impacts on their full range of ratepayers."




## CHALLENGES

- Maintaining/replacing aging infrastructure
- Anticipated growth
- Regulatory requirements
- Water resource limitations
- Climate change impacts
- Sustainable rate structure



## INTEGRATED PLANNING PROGRAMMATIC GOALS

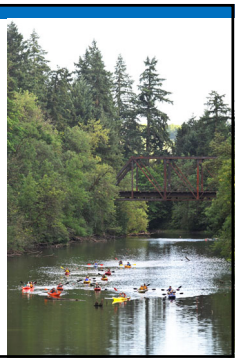
- Wastewater Treatment
  - Sustainable treatment processes
  - Natural infrastructure
- Stormwater Management
  - Achieve broader outcomes
  - Integrate stormwater and stream enhancement activities
- Watershed enhancement activities
  - Reuse through watershed enhancement
  - Flow enhancement through exchanges and instream leases
- Technology considerations
  - Continue to incorporate real-time instruments to manage systems
  - Continue innovation and technology

## WATERSHED-BASED NPDES PERMIT STATUS

- Current permit issued April 22, 2016
- Effective June 1, 2016
- Renewal application submitted December 1, 2020
- Permit expiration date: May 31, 2021
- With the submittal of the renewal application, permit is administratively extended
- CWS operates under the 2016 permit until DEQ takes action

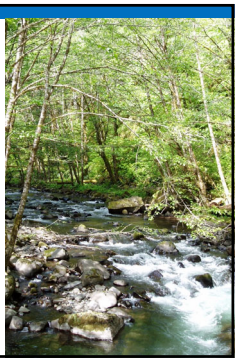
## PERMIT OBJECTIVES

- Continued implementation of watershed-based approach
- Operational improvements
- Expand recycled water use for environmental restoration
- Stream enhancement approach for subbasin stormwater
- Integrated Planning long-term narrative



## KEY PERMIT ISSUES

- Flow-based limits for ammonia
- Toxics, disinfection byproducts
- Temperature and thermal plumes
- Forest Grove WWTF and Natural Treatment System operations
- Copper and aluminum criteria
- Stormwater program requirements



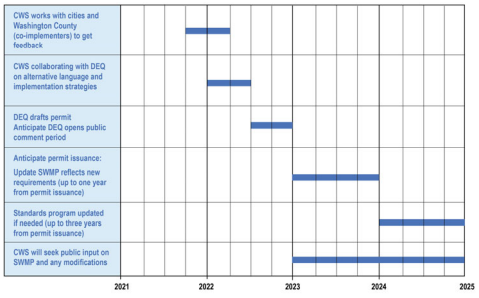
## STORMWATER PROGRAM

- Final MS4 permits for Phase 1 communities issued in September 2021
- Expect provisions will be incorporated into the watershed-based NPDES permit upon renewal
- New MS4 permits
  - Continue to require a management practice-based approach for municipal stormwater discharges
  - Continue to require control of pollutants to the maximum extent practicable (MEP standard)
  - Continue to require implementation of stormwater management practices in key program areas
  - There are some new/expanded provisions

## NEW MUNICIPAL STORMWATER (MS4) PERMIT PROVISIONS

- Schedule A: General provisions
  - Water quality standards
- Schedule A: Management Practices
  - Public education and outreach
  - Public involvement and participation
  - Illicit discharge detection and elimination (IDDE)
  - Construction site runoff control
  - Post-construction runoff control
  - Industrial/commercial stormwater
  - Pollution prevention for municipal operations

## OUTREACH TIMELINE

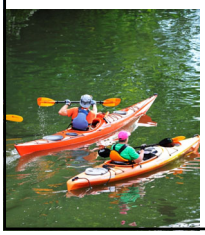



## QUESTIONS?

## LOCAL LIMITS UPDATE

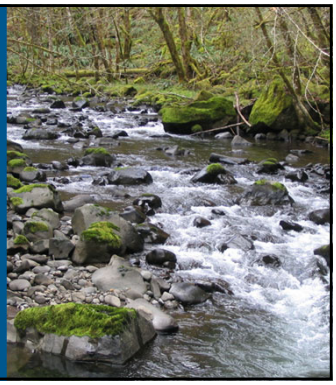
November 10, 2021

Clean Water Services Advisory Commission
Joy Ramirez, Environmental Services Supervisor
Bob Baumgartner, Regulatory Affairs Director



## AGENDA

- Industrial Pretreatment Program – Definition and Purpose
- What are Local Limits?
- Current Status of Industrial Pretreatment Program
- Next Steps



## INDUSTRIAL PRETREATMENT

- Regulates release of industrial wastewater discharged to the Publicly Owned Treatment Works (POTW) in order to protect:
  - Public health
  - Worker safety
  - Public infrastructure
  - The environment
- Highly regulated, specific parameters
- Specific discharge limits established by EPA for certain industrial categories; customized limits for specific chemicals and substances based on unique local situations

## CWS AND FEDERAL INDUSTRIAL LIMITS

- CWS (local) programs
  - Obtain cost recovery
  - Protect health, safety and beneficial reuse
- Federally mandated limits.
  - Establish categorical limits for specific industries, such as metal finishers and semiconductors. Require minimum technology
  - Prohibit dangerous conditions and outcomes
  - Prohibit certain toxic industries from discharging
  - Include local limits, direct CWS to develop these

## WHY NOW?

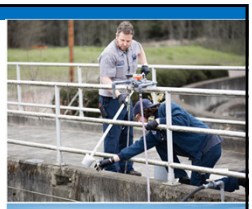
- Current NPDES permit
  - Requires local limits review
  - Prior to expected administrative extension of permit
- Substantial growth in industrial and domestic sources
- Must meet new federal and state water quality standards
- Increased flow from water resource and recovery facilities
- New discharges: Year-round discharge from Forest Grove facility related to natural treatment system
- Concerns about industrial impacts on ability to remove ammonia
  - Chemicals that temporarily stop nitrification reaction

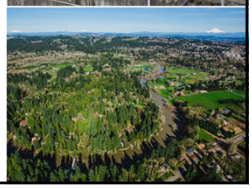
## CHALLENGES

- Complex proposed local limits
  - Assessed risk
  - Assessed potential compliance by industrial sources
  - New pollutants of concern
- Equitable distribution
  - Uniform
  - Contributing sources
  - Individual for select sources

## CURRENT STATUS: LOCAL PROGRAM UPDATES

- PFAS
  - Ongoing monitoring
  - One major source reduction
  - Identified a major PFOA source
- Reuse program
  - Collaborative approach
- Cost recovery
  - Ongoing





## CURRENT STATUS: PROPOSED LOCAL LIMITS

| Pollutant | Current Local Limit (mg/L, except pH) | Proposed Local Limit (mg/L, except pH) | | Proposed Local Limit (lbs./day) |
|---|---|---|---|---|
| | Durham, Rock Creek, Hillsboro and Forest Grove Facilities | Durham, Rock Creek, and Hillsboro Facilities | Forest Grove Facility | Applied to Specific SIUs |
| Arsenic | 0.34 | 0.23 | 0.23 | |
| Cadmium | 0.19 | 0.13 | 0.13 | |
| Chromium | 10.2 | 6.17 | 6.17 | |
| Copper | 2.71 | 2.71 | 1.15[1] | 8.00[2] |
| Cyanide | 1.38 | 1.17 | 1.17 | |
| Lead | 1.12 | 0.7 | 0.7 | |
| Mercury | 0.008 | 0.006 | 0.006 | |
| Molybdenum | 1.06 | 0.56 | 0.56 | 4.26[2] |
| Nickel | 2.31 | 2.26 | 2.26 | |
| Selenium | 0.97 | 0.35 | 0.35 | |
| Silver | 0.09 | 0.06 | 0.06 | |
| Zinc | 3.28 | 1.87 | 1.87 | |
| pH (S.U.) | 6-11 | 6 - 11 | 6 - 11 | |
| FOG | BMP | BMP | BMP | |

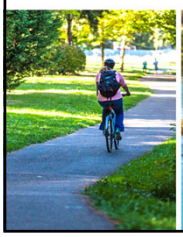
[1] To be proposed as a mass limit of 1.24 lb. /day for the only contributory Significant Industrial User
[2] Allocation to be distributed to two semiconductor facilities that discharge to the Rock Creek facility
[3] Allocation to be distributed to two semiconductor facilities that discharge to the Rock Creek facility and a metal finisher that discharges to the Hillsboro facility

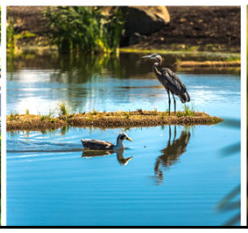
## NEXT STEPS: HOLD FORMAL PUBLIC COMMENT PERIOD

- ☑ General outreach to all industrial sources and interested parties
- ☑ Received initial stakeholder input and determined any modifications to proposed local limits, as appropriate
- ☑ Submitted Local Limits evaluation report to DEQ
- ❑ Complete formal public notification and comment period
- ❑ Submit any revisions for DEQ final approval

## QUESTIONS?

CleanWater Services Since 1970





# Clean Water Services Advisory Commission Meeting Summary

**Date:** June 9, 2021

**Location:** The meeting was conducted on Webex

## Attendance

Attending the meeting from CWAC:

- Tony Weller (Homebuilder-Developer 1), Commission Chair
- Mike McKillip (District 3/Rogers), Commission Vice Chair
- Alan Jesse (Agriculture 2)
- Alex Phan (District 1)
- Andy Duyck (District 4/Willey)
- Art Larrance (At-Large/Harrington)
- Jan Wilson (Environment 1)
- Lori Hennings (Environment 2)
- Matt Wellner (Homebuilder-Developer 2)
- Molly Brown (District 2/Treece)
- Stu Peterson (Business 2)
- Terry Song (Business 1)
- Sherilyn Lombos (Cities/nonvoting)
- Diane Taniguchi-Dennis (Clean Water Services Chief Executive Officer/nonvoting)

Absent:

- John Jackson (Agriculture 1)

Attending the meeting from Clean Water Services:

- Mark Jockers, Chief of Staff
- Joseph Gall, Chief Utility Relations Officer
- Gerald Linder, General Counsel
- Bob Baumgartner, Regulatory Affairs Director
- Raj Kapur, Compliance and Permitting Manager
- Joy Ramirez, Environmental Services Supervisor
- Ken Williamson, Research and Innovation Director
- Shannon Huggins, Public Involvement Coordinator
- Chris White, Public Involvement Coordinator
- Jody Newcomer, Technical Editor & Communications Specialist
- Victor Davidson, Information Technology Analyst

Attending the meeting from the public: None

## 1. CALL TO ORDER

Tony Weller called the meeting to order at 5:34 pm.

Jody Newcomer announced the meeting was being recorded and reviewed best practices for Webex meetings. Shannon Huggins recognized all attendees.

## 2. REVIEW/APPROVAL OF MEETING NOTES

There were no other comments regarding the notes from the meeting on April 14, 2021. The notes were approved.

## 3. NPDES PERMIT APPLICATION STATUS AND UPDATE

- Bob Baumgartner, Regulatory Affairs Director

The District submitted a renewal application for its watershed-based National Pollutant Discharge Elimination System (NPDES) permit, which expired on May 31, 2021. The CWS permit has been administratively extended and Regulatory Affairs staff expects that extension to continue for several months, perhaps into next year.

CWS has a unique NPDES watershed-based permit that integrates the four water resource recovery facilities and the municipal stormwater program. The integration allows flexibility in how CWS addresses water quality in the Tualatin River Basin and maintains compliance. The permit incorporates a trading component for flow enhancement and riparian restoration to offset thermal loads. It also has a provision to manage loads from multiple plants — an approach called bubble loads. This enables CWS to optimize treatment at its water resource recovery facilities and meet the combined load limit. As a result, there's no need to overbuild the facilities to meet worst case scenarios, which results in significant savings on capital expenses.

In conjunction with the permit renewal, Regulatory Affairs staff is reviewing associated plans and documents. DEQ just approved a new Water Reuse Plan, and already approved an update to the Nondomestic Waste Ordinance and the Industrial Pretreatment Manual. CWS has updated and submitted plans for biosolids and stormwater management, a local limits evaluation and is updating a Thermal Management Plan. CWS already has in place a robust mercury minimization plan, which is a DEQ requirement.

The permit application includes a long-term integrated plan, which articulates strategies that CWS wants to implement in the next five, 10 and 20 years. CWS has proposed operational improvements in several areas including flow-based limits, reducing disinfection byproducts, removing aluminum and phosphorus, flexibility for trading and bubble loads, and operating the Forest Grove Water Resource Recovery Facility and Natural Treatment System. CWS also wants to integrate stormwater approaches for stream enhancement and restoration into the regulatory process.

DEQ is concerned about flow-based limits for ammonia; toxics and disinfection byproducts; temperature and thermal plumes, which can inhibit fish migration; Forest Grove compliance

standards; and criteria for copper and aluminum. Copper is primarily an issue at Forest Grove, where the water is softer and the copper criteria is low. Copper is more toxic when it is bioavailable, meaning it's readily available to aquatic life. Softer water means fewer dissolved ions in the water column, so there is less mixing at the atomic level of copper with dissolved ions in the water column. Thus, more of the copper is bioavailable for uptake by organisms in soft water. CWS is considering additional treatment and is working to reduce copper from industrial sources.

A significant component of the permit relates to the stormwater program. CWS anticipates new requirements related to water quality standards and new development. Several municipalities in the state, including CWS, Portland, Salem, and Eugene, are under a Phase 1 MS4 (municipal separate storm sewer system) permit. DEQ drafted a new MS4 permit, opened it for public review, and is working through the comments. CWS is not on the same MS4 renewal cycle because stormwater is addressed in its watershed-based NPDES permit, but CWS participated with the other cities in the renewal process and provided comments on the permit. It is likely that DEQ action on the MS4 permit will be carried over to the CWS watershed-based NPDES permit.

Stormwater is a management practice-based program with a maximum extent practicable (MEP) standard. Because MEP is subject to interpretation and EPA doesn't clearly define it, there can be dramatic changes from permit cycle to permit cycle. Changes to the Design and Construction (D&C) Standards might be necessary if DEQ changes permit conditions that govern new development (i.e., post construction standards). One goal of implementing a long-term integrated plan is to minimize the abrupt shifts in policies and approaches.

DEQ is considering implementing a retention standard, which would require new development to retain all water onsite and allow it to infiltrate in the soils or evaporate rather than allow it to run off. Most soils in the Tualatin basin do not allow a lot of water to quickly infiltrate. DEQ has been working on three alternatives:

1. Design a system that captures and retains runoff.
2. Identify strategies for low impact development and retention, determine how runoff would be treated, and try to maximize use of retention.
3. Identify methods to achieve predevelopment hydraulic conditions.

DEQ is also considering whether to require stormwater programs to meet water quality standards. CWS and cities are working with DEQ to develop a process to respond to water quality concerns. Key to that effort will be controlling illicit discharges and tracking and reporting conditions that contribute to water quality issues.

DEQ and CWS have scheduled a series of meetings to work through assorted topics in the permit.

## QUESTIONS, COMMENTS

**How do stormwater issues relate to changes made to the D&C Standards in 2018-2020? Are the DEQ proposals applicable to areas without hydromodification facilities, or where there are older facilities, or are they specific to anything new going forward?**

The stormwater proposals are specific to anything new going forward. DEQ's different permit writers have different priorities. In 2016, DEQ permit writers focused on hydromodification; today they're focused on retention criteria. CWS and other cities are working to reconcile the shifting priorities.

**We just went through a process that resulted in larger ponds. Are we going to go through a process that will result in even larger ponds?**

This is certainly a huge issue in the permit renewal. CWS is closely reviewing the draft permit provisions to determine its impact on the recently updated D&C Standards, and staff is evaluating potential revisions to the permit conditions to minimize the impact on the D&C Standards.

**Will (CWS Water Resources Program Manager) Chris (Faulkner's) instream planning work - determining what we can do in basins to strengthen stream corridors — play a role in the conversation?**

Absolutely. Baumgartner said CWS needs to give DEQ credit for incorporating that work in the MS4 permit that went out for public comment. The draft MS4 permit includes a provision that notes that instream work conducted through subbasin planning efforts can be employed as a mechanism to address runoff from new development.

**We have less and less of the basin to develop and we keep raising the standards to more and more difficult things to accomplish on smaller, more segregated pieces of land that don't mimic the natural system. We have soils with high clay content that don't retain much water. I feel like we're going to make it impossible to do anything, especially when we try to apply new standards in retrofit cases and the system and development standard doesn't allow it to happen. Please have a careful eye on this issue.**

Baumgartner said he thinks we need to be very thoughtful about how we approach permit conditions.

**Is there anything in the permit that requires CWS to addresses low water flows in tributaries like Dairy Creek or Gales Creek — tributaries that CWS doesn't discharge to?**

No. DEQ's focus in the urban area is on higher flows that can cause erosions. There are no requirements in the permit to address low water flows in tributaries CWS doesn't discharge to. One reason CWS does restoration is to enhance base flows, but it's not a regulatory requirement.

**This will be a drought year. It looks like some of the tributaries are as low now as they were in August last year. How will that affect our stream augmentation in the Tualatin mainstem when the tributaries are not supplying the same amount of water?**

This year is the earliest CWS has had to release water to augment flows for thermal credits and to meet targets. As tributaries dry up, CWS has greater demands.

Raj Kapur said CWS is coordinating with the Tualatin Valley Irrigation District (TVID) to start releases early to get flows into the tributaries. Usually we start in middle to late July, but flows are very low this year. Only a portion of the overall flow we release gets to the tributaries. The mainstem will continue to have the bulk of the flow. CWS typically releases 40-50 cfs (cubic feet per second), and only about 5-6 cfs is directed to the tributaries. CWS doesn't see significant change in the water that will be available in the mainstem.

Mark Jockers said this is the earliest CWS has released water since Scoggins Dam was built. CWS releases water into the river to improve water quality and maintain permit compliance. CWS has an interesting partnership with TVID. CWS uses TVID's pressurized system and turnouts on farmers' properties to add a few cfs to tributaries, to improve water quality and to broaden the benefits of the stored water releases beyond the mainstem Tualatin River.

Kapur said a couple of cfs is a significant part of the base flow in the tributaries this time of year. It's very important to have this additional water in the tributaries to improve water quality and provide habitat.

Baumgartner said water quality modeling showed that additional water provides a significant benefit for the tributaries.

**Question about integration with cities and what the application process means. Are you coordinating with cities as implementers?**

Baumgartner said CWS coordinates with cities through co-implementers teams. As the permit develops, CWS will have a lot of interaction with the cities. He expects DEQ to require CWS to update its stormwater management plan. He also said he thinks it would be valuable to coordinate more with cities to shape the program for the next five, 10, 15 years.

Lombos said thank you. We (the cities) would welcome that.

## 4. PUBLIC COMMENT

None.

## 5. ANNOUNCEMENTS

- The next meeting is scheduled for August 11, 2021.
- CWS hopes to return to in-person meetings with a joint meeting with the Board of Directors on Wednesday, September 8, 2021. We hope to do a canoe trip and barbeque at Cook Park.

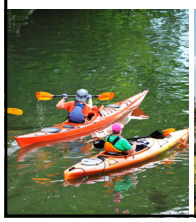
## 6. ADJOURNMENT

Weller adjourned the meeting at 6:30 p.m.

## NPDES PERMIT RENEWAL

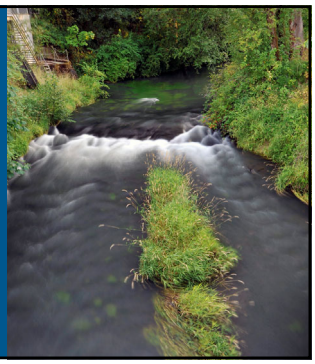
Raj Kapur and Bob Baumgartner
Regulatory Affairs Department
CWAC meeting
June 9, 2021

CleanWater Services
Since 1970



## AGENDA

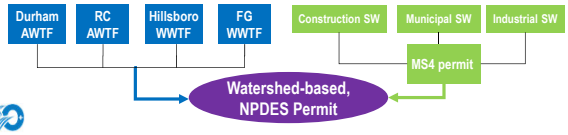
- Watershed-based NPDES permit
- Permit renewal application process
- Integrated Plan
- Strategies being pursued with permit renewal
- Key issues
- Next steps



## WATERSHED-BASED NPDES PERMIT

Includes:

- Permits for 4 WWTFs and municipal stormwater program
- Water quality trading for temperature
- Bubbled loads for TSS and phosphorus
- Flow-based limits




## PROCESS TO REISSUE PERMIT

- Current permit issued April 22, 2016 ✓
- Effective June 1, 2016 ✓
- Renewal application submitted December 1, 2020 ✓
- Permit expiration date: May 31, 2021 ✓
- DEQ initial review spring 2021 ✓
- DEQ will pose questions for clarification ✓
- DEQ public process late summer – fall 2021
- DEQ issues permit fall 2021 or latter

## COMPLEX PERMIT RENEWAL APPLICATION

Our application included nine components

TABLE OF CONTENTS

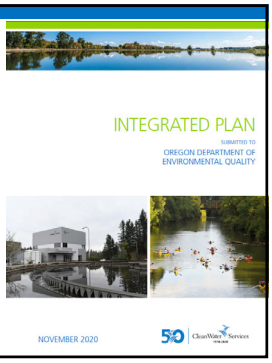


## ASSOCIATED PLANS AND DOCUMENTS

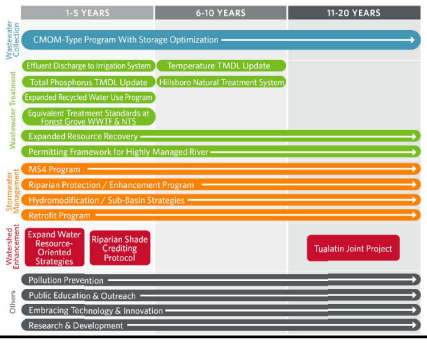
- Water Reuse Plan ✓
- Biosolids Plan ✓
- Stormwater Management Plan ✓
- Thermal Load Management Plan ✓
- Mercury Minimization Plan ✓
- Nondomestic Waste Ordinance ✓
- Local Limits Evaluation ✓
- Industrial Pretreatment Manual ✓

## CWS INTEGRATED PLAN

- Specialized part of NPDES permit renewal application
- Establishes long-term permitting strategy
- Communicates goals, strategies, activities to regulators/stakeholders
- Complements other planning efforts




## CWS INTEGRATED PLAN

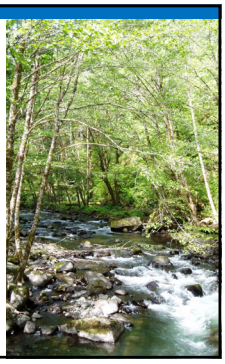



## PERMIT OBJECTIVES

- Holistic watershed-based approach
- Integrated Planning long-term narrative
- Operational improvements:
  - Flow-based limits
  - Strategy to reduce disinfection byproducts
  - Phosphorus and aluminum removal
  - Trading, bubble loads, flexibility
  - Forest Grove WWTF & NTS
- Expand recycled water use for environmental restoration
- Stream enhancement approach for subbasin stormwater

## KEY DEQ ISSUES

- Flow-based limits for ammonia
- Toxics, disinfection byproducts
- Temperature and thermal plumes
- Forest Grove compliance standards
- Copper and aluminum criteria
- Stormwater
  - Water quality standards
  - Retention and post construction

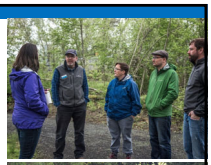


## STORMWATER

- DEQ: Other Phase 1 MS4 permits
  - Completed public process
  - Many competing comments; working through them
- CWS: Substantive issues
  - Water quality standards
  - Illicit discharge
  - Tracking and reporting
  - Post construction retention standard
  - Low impact development priority
- Reporting schedules and formats
- Monitoring

## POST CONSTRUCTION STORMWATER REQUIREMENTS

- Reviewing current CWS requirements
  - Low impact development
  - Water quantity and quality
- Assessing changes to permit language and/or standards

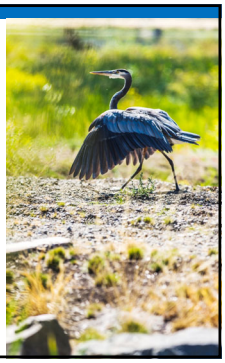


## WATER QUALITY STANDARDS

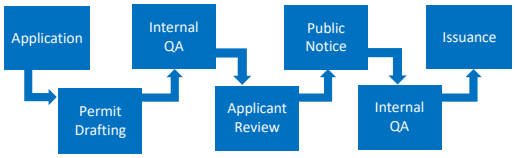
- Draft permit language:
  - "If pollutant is causing/contributing to an exceedance of water quality standard, corrective action required."
  - Permit specifies timeframe for taking correction action
  - Corrective action defined by nature of discharge
    - Illicit discharges
    - Stormwater discharges
  - Need to define scope of likely issues and approach

## NEXT STEPS

- Preparing materials to support permit issuance
  - Mercury minimization plan
  - Thermal load management plan
  - Water quality evaluations
  - Compliance strategies for some pollutants
  - Stormwater program requirements
  - Other materials
- Coordinating with DEQ



## DEQ PERMIT PROCESS/SCHEDULE




- Review application, draft permit: Spring/summer 2021
- Public review: Late summer 2021
- DEQ target issuance date: Fall 2021

## QUESTIONS?