



Wastewater Newsletter

City of Coeur d'Alene

Volume 1, Issue 1

January 2011

City Files Law Suit In Idaho Federal Court Challenging The Washington Dissolved Oxygen TMDL

The recent Dissolved Oxygen (DO) TMDL developed by the EPA and Washington's Department of Ecology (DOE) places Idaho dischargers at a considerable disadvantage over that of Spokane County and the city of Spokane. Idaho dischargers were not given high discharge values for future growth and were limited to 36 parts per billion (ppb) total phosphorus compared to 42 ppb for the above Washington plants. The TMDL sets the ammonia limits at 1 ppm and CBOD at 5 ppm. Obviously, we cannot accept the phosphorus or ammonia limits without tearing down and replacing our trickling filter/solids contact process.

We have engaged in settlement discussions with EPA's legal counsel and are hoping that recent model runs we have commissioned will be given serious consideration. We are proposing the following limits for the oxy-

gen depleting compounds:

- Total phosphorus — 50 ppb as a **seasonal** average of February thru October..
- Ammonia— 6 ppm from March thru October.
- CBOD— 4 ppm seasonal average of March thru October.

If we do go to court, we can expect EPA to argue that we Idaho dischargers have no legal standing as this is a Washington TMDL and not an Idaho one. Assuming that our suit is thrown out, we can sue in Washington state court. We also have the ability to update and resubmit our Use Attainability Analysis that justifies a change in Washington's water quality standard for DO.

We expect draft permits sometime in the spring. We will defi-



Casey and Mike patent new odor control technology.

nately challenge the permits as well if they contain unachievable limits on CBOD, ammonia and total phosphorus.

We have joined with Post Falls and HARSB in our suit. The city of Spokane & Spokane County have filed against us.

University of Washington Completes Bioavailability Study of Phosphorus In Tertiary Effluent

Dr. Michael Brett and his graduate student, Bo Li, finalized their nearly 2 year study on the portion of phosphorus in wastewater effluent that is biologically available to grow algae—abbreviated BAP.

Samples were collected from local treatment plants—both secondary and tertiary effluents. Tertiary effluents came from the cities of Spokane & Coeur d'Alene pilot plants plus Inland Empire Paper's full-scale tertiary plant.

Using Standard Methods, algae were introduced to the samples. After 2 weeks, algae mass was determined. The percentage of the phosphorus that was up taken by the algae was then calculated.

In most cases of the tertiary effluents, only 10 to 20% of the phosphorus can support algae. This means that if we had a limit of 360 ppb phosphorus, only 36 ppb would be BAP.

Unfortunately, EPA has indicated they are unwilling to accept the results.

If you would like to view the entire slide presentation, it will be on the department share drive—the "F" drive under wastewater & then look in the "BAP" folder.

Message from the Superintendent

I have been remiss in keeping you all in the loop as to what direction the utility is going and what challenges we have been facing. The intent is to make this a monthly occurrence.

This first newsletter (and hopefully not the last) gives you a quick outline of what EPA is considering to place in our new discharge permit.

I've also included a brief article about a recently completed study on the bioavailability of phosphorus in tertiary plant effluent. We contributed to the cost of the research as did DOE.

I need your input—let Torri or me know what you'd like to hear more about.

Sid

Birthdays

- Tom Steeley 1/8
- Don Keil 1/9
- John Dearth 1/18
- Darrell Castleberry 1/21