



Chesapeake Bay Program
Wastewater Treatment Workgroup (WWTWG)
Meeting Minutes

Wednesday, October 30th, 2024
10:00 AM to 11:15 AM

[Meeting Materials](#)

Actions and Decisions

ACTION: Justin will follow up with the group regarding the request for CSO data.

ACTION: Jackie will coordinate with Sushanth to inform the workgroup when the web viewer for septic/MS4 areas is available.

ACTION: Jamie will follow up with jurisdictional members to solicit substantive recommendations regarding the SSO issue.

ACTION: Jamie will follow up with VA regarding TSS and will see if anyone else has things to add on their jurisdictions.

Meeting Minutes

10:00 **Introduction and Announcements** – WWTWG Co-Chairs, Jamie Heisig-Mitchell, HRSD & Justin Carl, Alex Renew (10 min)

- *Please put your name and affiliation in the chat box for attendance purposes. Thank you!*
- **Decision requested:** Approval of August Meeting Minutes.
 - The approval of the August minutes was moved to the first quarterly meeting of 2025.
- Joint meeting with Urban Stormwater Workgroup, [Tuesday, November 19th, 10:00AM](#)

10:10 **Small Group Status Updates** – Various (30 min)

Following the workgroup's May meeting, three small groups were formed to delve into relevant wastewater Phase 7 model topics presented in May. Each small group met in July and September and a volunteer from each group shared a brief verbal status update about their next steps (~5 minutes each). A list of the groups followed by the volunteer presenting on their behalf is below:

- Exfiltration and SSO data – Jamie Heisig-Mitchell, HRSD
 - Looking at what variables make sense to include when considering the level of exfiltration in urban areas. Sensitive to potential for overstating the problem, so the group has been looking at variables including linear feet of gravity collection system, groundwater table (to determine whether infiltration or exfiltration are dominant), and percentage of pipe rehabilitated.
 - Henrico County brought up another potential mechanism for estimating exfiltration. They estimate it as a percentage of the total volume entering their system on an annual basis. This is a simplified approach that could work if a specific locality wanted to adjust their estimate. There would be monitoring or

mitigating factors to consider regarding mitigating the estimate. These could include things like the underlying geology.

- There is an opportunity to test this out using smaller systems, Jamie has been discussing with Joseph Delesantro regarding this. Having specific examples with numbers could be helpful.
- Considerations regarding jurisdictional data, who has robust data and who doesn't.
- Dave Montali commented regarding the importance of normalizing flow if using it as a variable. Dave suggested the simplified approach and varying by geology, before adding system specific factors like flow.
- Jamie mentioned that in her conversation with Joseph they used average flows but noted that some jurisdictions use average dry weather flows. It's important to use actual flows versus design flows, and we can come up with ideas about how to incorporate temporal variation in flow.
- There was discussion of Henrico's estimate of exfiltration being 1-2% of total flow. Ed Cronin mentioned that data on flows could help characterize the scope of the problem.
- CSO data – Justin Carl, AlexRenew
 - Justin reached out to WV and followed up this week. Zach Steckler, PA DEP will send a report on PA communities. DE is off the list and MD is tracking down some data. Ed Cronin and Justin will tackle the NY data, and welcome comments if members have leads on this.
 - Ed briefly covered his presentation from the small group meeting regarding what information the group is looking for in terms of CSO communities. Ed mentioned that WV WLA's tend to be based on an 85% reduction but that the group wants to see the data. PA has a range of system sizes which will allow for comparison based on annual reports.
 - The next CSO update will cover work in DC and VA, among others. The group is looking at how the CSO systems are being accounted for, especially in states like PA.
 - Justin will follow up with the group regarding the data request.
 - Dave Montali mentioned that regarding WV they are still working on getting information regarding CSO separation and long-term data.
 - Shannon McKenrick, MDE mentioned that MD's data will be sent later in the week.
- Boat pump-outs – Ivy Ozmon, HRPDC
 - The group had concerns with prior load estimate methodology and went back to their respective stakeholders to gauge interest in revising the BMP. Because of that, decided it would be helpful to document concerns with methodology and firm up the numbers used as a threshold for reevaluating this BMP in the future. Concerns heard that if the load exceeds a threshold In terms of volume or

nutrient loading the BMP should be reevaluated. The group will draft a framework for reevaluation and share it with the larger group for feedback.

- Recommending tabling the BMP update but with good documentation of the reasons for doing so.

ACTION: Justin will follow up with the group regarding the request for CSO data.

10:40 **Septic systems and sewer service areas for Phase 7** – Jackie Pickford, USGS (15 mins)

Jackie described the current approach and timeline for preparing and updating septic and sewer service data for the Phase 7 watershed model. She will have a follow-up presentation to the Urban Stormwater Workgroup at their November 19th [meeting](#). At that time, she will have some initial data to share.

Discussion:

Dave Montali: Are you going to notify other workgroups about the web viewer?

Jackie Pickford: Yes, I was planning on including USWG and WWTWG but can include LUWG too.

Jeremy Hanson: Is there a specific reason for the half acre threshold for parcels?

Jackie Pickford: That's best professional judgement. We'll see how it plays out and tweak it as necessary. We are open to feedback if others have suggestions.

Dave Montali: Half acre parcels outside of sewer service areas will be assumed to have one system, is that the way it's going to go?

Jackie Pickford: Yes, but only developed residential parcels.

Dave Montali: Does there have to be a structure on it?

Jackie Pickford: Yes.

Jamie Heisig-Mitchell: When the web viewer goes out, will we have the information to allow us to understand what the web viewer is showing us as we look at the data?

Jackie Pickford: Yes, the web viewer will really just be showing the sewer service areas. The septic areas will be a little bit later. I'll give more details when I send out that email.

Jeremy Hanson: When you come to the USWG with more time to put this all together, is there an estimated number of systems by jurisdiction? I'm personally curious to see what the number would be for the proposed methods. Having some form of comparison so that we know the impact and whether we're gaining or losing a lot of systems.

Jackie Pickford: I can provide that information at the USWG.

ACTION: Jackie will coordinate with Sushanth to inform the workgroup when the web viewer for septic/MS4 areas is available.

10:40 **Flex Time for new items or other business** – WWTWG Leadership Facilitating (30 mins)

WWTWG Leadership solicited additional updates and facilitated discussion on other business or parking lot items from the [May](#) and [August](#) meetings.

Discussion:

Jamie Heisig-Mitchell: I'm pretty sure that VA has received reports on SSOs and probably has a database associated with SSOs. I know in the Hampton roads area; we have a specialized regulatory reporting database for SSOs. Does anyone on the call have a sense for what is going on within their states with regard to SSO loads?

Dave Montali: Same tired story, there's going to be very little information from WV. The group needs to think about what is an SSO. Is an episodic pump station going down and getting fixed something we want to deal with, or communities that have wet weather overflows that are not CSO REF and have a chronic history of overflows? In WV there aren't any of those, but every system has things happen that are episodic in nature. They get fixed, but I'm not sure its something we can model. The system is very bad, NPDES permits don't regulate SSOs, they require notification of spills and overflows, estimated volumes, but it doesn't always happen and there's no database that chronicles particularly SSOs. There might be something out there for other permitted entities, but its not good, there's no review or monitoring that will help us in WV.

Jamie Heisig-Mitchell: I suspect that your comments are true even in VA, there's a lot of estimation that goes into these reports. That's not because people have information and aren't providing it, but because it can be difficult to estimate volumes in collection systems.

Joseph Delesantro: I seem to remember that EPA was going to impose an e-reporting requirement for SSOs and that this got pushed back several times (its date of coming into effect). Has anyone here been following that and has any idea what I'm talking about? That would be a date when we would be able to expect wider spread and more easily accessible reporting which would of course have all the issues Dave has previously mentioned.

Jamie Heisig-Mitchell: I don't personally know of an update in Hampton Roads because of our widespread locality and HRSD consent decree, we developed a separate system for e-reporting. That's a unique set up and structure, I'm not sure about the EPA reporting (link to EPA [rules](#)).

Dave Montali: I just want to caution what I heard because I raised that point to WV DEP permitting folks. Just because there's an EPA requirement doesn't mean it happens is the answer I got. Enforcement discretion, that type of thing probably falls low on the list. Don't put all your chickens in the basket that if there's a reporting requirement, we'll have data everywhere.

Joseph Delesantro: I just found the Phase 2 implementation plan for this e-reporting, and it says that its supposed to come into effect at the end of next year, but there's a pathway for states to request an extension.

Justin Carl: In Alexandria we have an SSO that needs to be addressed as part of our CSO program in the Hunting Creek TMDL. We have to control 100% of that SSO and it was based on storm sizes for the TMDL period of 2004-2005. I agree with Dave that we shouldn't be trying to capture SSOs that happen in an emergency or pump station failure, some criteria to put guardrails around this might be the right approach.

Jamie Mitchell: I know many years ago EPA prioritized issuing federal enforcement for communities that had these...rehab plans so capacity related or wet weather SSOs would have been reduced dramatically. I don't have a sense for how many large urban areas in the CBW are under a consent decree and implementing their rehab plans. I can try to figure it out for VA but do others on the call have a sense for that?

Bel Martinez da Matta: I know that MD has a database online for SSOs. There is some concern with the accuracy of the location of those. The person reporting could provide their address as opposed to where the SSO is happening. The information is in quantity of gallons, which I can provide if necessary.

Jamie Mitchell: Maybe if we can each go back and see what's available and try to figure out how to improve upon the accuracy of this data. We want to make sure we aren't over or underestimating so that we know the information going into the model is reasonably accurate.

Ed Cronin: The other thing we can do is look at the storms in the baseline period to see what size storms we are seeing. Mostly, SSOs are going to be in the more extreme wet weather and most people with consent decrees on wet weather or rain from controlling a one to ten year storm, most of them are in the two to five. I wouldn't want to have undue administrative burden for people to have to report on this stuff. As far as having an allocation in the model for more of the extreme wet weather is where I would see the SSOs. Like Dave said it's not the pump failures or the random ones, its going to be the chronic pieces.

Dave Montali: I wanted to stress that its those with chronic SSOs. If you ask the permitting folks in the states, they should be able to give a quick answer on which communities have SSO issues. This came up because of our new Phase 7 estuarine model where we're trying to dive into shallow water embayments and do a better job of prediction. There's a model going on in the Baltimore area, and the PI on that project is saying the overflows in that area are substantively affecting the WQ predictions. All anecdotal but that's where the concern came by something we don't have in the model affecting estuarine water quality so our calibration will misappropriate that load. The main importance is chronic and large volume overflows.

Jamie Mitchell: Did anyone happen to learn anything more about TSS loads from water treatment facilities in your own state?

Dave Montali: Nothing new from me, I've asked WV DEP if they allow solids discharge and they said no, its got to be dealt with by not putting it in the river.

Ed Cronin: 1991-2000 was the base case. Were treatment plants discharging in that instance, that's the information we want, but most communities aren't doing that anymore.

Bel Martinez da Matta: I did reach out to our permitting folks, and based on their response there are limits on TSS loading from those facilities and the expectation is that finished water will be low on TSS if not non-detect. I did not hear back on past cases but can follow up.

Ivy Ozmon: The same is true in VA at least for larger plants. I'll look into the threshold for plants requiring a NPDES permit but its very low.

Dave Montali: It's usually filter backwash and treatment that's permitted.

Jamie Mitchell: So, it's more this unusual and intermittent case of settled solids going out?

Dave Montali: It didn't happen back in the nineties. We'll ask again for the sake of completeness because Ed made a good point about modeling. Regarding biosolids data collection, I think that

went to the LUWG. There is a template that the WWTWG had developed several years ago that the states were using to feed in their biosolids land application data. The workgroup, at that time, looked at that data and ensured there wasn't anything unusual and then it was used in the model. Some states have been updating that data on an annual basis, but some haven't updated it in a while. At the LUWG it was USGS that requested an update of that data.

Jeremy Hanson: There was a separate request from USGS on biosolids related to a study they are doing on biosolids and toxics and PFAS in biosolids. I think that was a request people may have seen or maybe we need to spread that request a little more.

Jamie Mitchell: I'm not sure if I saw that or got it conflated with updating the model.

Jeremy Hanson: There is that floating out there, recently only VA and MD report biosolids annually, and the rest of the states are just using what was used for calibration. There may be a need to see if we can update or expand that for the next calibration or going forward. I'm not the best person to speak to that, Meghan and Jess are on the line and can speak to those if there are questions.

Jamie Mitchell: VA does have a database they use for all the application data, including the tracts where the material was applied.

Dave Montali: That doesn't seem right to me, it seems like it should land in this workgroup. I didn't realize other states don't report on their sludge qualities or amount annually. Those things go into our nutrient spread across agriculture. I think we need to hear exactly who is doing what and whether we can improve. If a bunch of states aren't doing it and we're relying on data from 2013 that doesn't make sense to me.

Jamie Mitchell: For those of you who represent the regulatory side of the state programs, I know VA has a database, and I'm not sure why it isn't updated annually. I can follow up with our state to figure that out, but curious whether anyone on this call is involved in those programs and knows what is preventing reporting into CAST.

Jess Rigelman: It's reported via the point source app and then its moved into CAST.

Bel Martinez da Matta: MD has been using the template and we report in terms of counties. We don't have it as fine as where it was specifically applied but we do have the county. The template has been OK for us to use.

George Mwangi: We did report that data last week, maybe for the first time through that template.

Jamie Mitchell: So, I heard DE report, WV report, did I hear MD report? I'll check on VA. Any thoughts, comments on the frequency of the meeting, and then we can talk about trying to maintain the same timeline?

Dave Montali: This is coming up on a number of fronts, but there's going to be strong concern about work these groups are doing and needing it to be finalized by June 2025. I don't know what you had as the ultimate timeline for doing all this, but you're going to hear more and more about the need to accelerate. The models build on each other and the whole process has to be done by December 2025, so the watershed model needs to be done by the middle of the year.

Jamie Mitchell: We had talked in the small workgroups about getting recommendations around the February March timeframe. I think if we start meeting in January February monthly we

should be good. Between now and January we can meet in the Small Groups and put some more meat to these recommendations.

Jeremy Hanson: Right now, we're on the first Tuesday of the month. That's ok for January. February would be the 4th; I'm not going to look at the rest of the months but the other option is every other month. That's less common for groups but it's an option.

ACTION: Jamie will follow up with jurisdictional members to solicit substantive recommendations regarding the SSO issue.

ACTION: Jamie will follow up with VA regarding TSS and will see if anyone else has things to add on their jurisdictions.

Next Meeting: [Thursday, January 23rd, 2025](#)

Acronym List

CBP: Chesapeake Bay Program

CSO: Combined Sewer Overflow

HRSD: Hampton Roads Sanitation District

WLA: Waste Load Allocation

WWTWG: Wastewater Treatment Workgroup