

**MWPAAC RWSP Policy Review Task Force
Discussion/Proposed Amendments
King County Industrial Waste Program Policies
WORKING DRAFT**

WTD Staff Thoughts on Policy Guidance for Potential King County Industrial Waste Program Policies	MWPAAC RWSP Policy Review Task Force Proposed Amendments as of August 12, 2015; Approved by MWPAAC on Oct. 28, 2015	Task Force Comments/Discussion	Sub-committee/Full MWPAAC Comments
<p>Explanatory Material. The King County Industrial Waste (KCIW) program is delegated under the federal Clean Water Act to the State of Washington and this authority has been further delegated to KCIW to administer and enforce federal, state and King County (K.C.C. 28.84.060) environmental regulations. This delegation of authority allows KCIW to authorize and monitor industrial facilities that discharge into the King County sewerage system. Since 1969, the KCIW has required many industries to pretreat wastewater before discharging it into the sewer.</p> <p>The following policy statements provide overarching guidance to the county's industrial waste program.</p>	<p>Explanatory Material. The King County Industrial Waste (KCIW) program is delegated under the federal Clean Water Act to the State of Washington and this authority has been further delegated to KCIW to administer and enforce federal, state and King County (K.C.C. 28.84.060) environmental regulations. This delegation of authority allows KCIW to authorize and monitor industrial facilities that discharge into the King County sewerage system. Since 1969, the KCIW has required many industries to pretreat wastewater before discharging it into the sewer.</p>	<p><i>August 12, 2015 discussion:</i> Task Force members asked WTD staff to confirm if the KCIW is fully delegated by the state and federal authorities. <i>WTD staff checked in with its KCIW program staff and confirmed that this is the case.</i></p> <p>There was a question on if the program also authorizes discharges into the stormwater system; WTD staff confirmed that it is just the sewer system.</p>	
Industrial Waste Policy (IWP)-1. The mission of the county's KCIW program shall be to protect the environment, public health, worker safety, quality of resources recovered from the treatment process (i.e. biosolids, reclaimed water), water quality, and King County's regional sewerage systems.	Industrial Waste Policy (IWP)-1. The mission of the county's KCIW program ((shall be)) is to protect the environment, public health, worker safety, water quality, the quality of resources recovered from the treatment process (i.e. biosolids, reclaimed water), ((water quality,)) and King County's regional sewerage systems.	<i>August 12, 2015 discussion:</i> Task Force members noted the policy would read better by putting "water quality" before "quality of resources recovered the treatment process".	
IWP-2. KCIW shall work cooperatively with the local agencies and its customers on identifying and regulating industrial discharges, providing technical assistance and incentives for compliance.	IWP-2. KCIW shall work cooperatively with the local agencies and ((its)) their customers on identifying and regulating industrial discharges, providing technical assistance, ((and)) incentives for compliance, and enforcement.	<i>August 12, 2015 discussion:</i> Task Force members discussed adding "enforcement" to the policy.	
IWP-3. KCIW shall continue to work with federal and state regulatory agencies and with local agencies on potential future rules and regulations that could affect the KCIW program and the county's regional sewerage system.	IWP-3. KCIW shall continue to work with federal and state regulatory agencies and with local agencies on potential future rules and regulations that could affect the KCIW program and the county's regional sewerage system.		
IWP-4. WTD shall consider developing a fair and equitable cost-recovery fee structure for industrial dischargers of high-strength waste.	<p>IWP-4. WTD shall consider developing a fair and equitable cost-recovery structure, such as surcharges, for industrial dischargers of high-strength waste, which means waste that has a biological oxygen demand greater than 300 milligrams per liter or total suspended solids greater than 400 milligrams per liter.</p> <p>((IWP 4. WTD shall consider developing a fair and equitable cost recovery fee structure for industrial dischargers of high-strength waste.))</p>	<i>August 12, 2015 discussion:</i> Task Force members suggested incorporating this potential policy with the next policy.	<p><i>Joint Engineering and Planning and Rates and Finance subcommittees meeting on September 3, 2015:</i></p> <ul style="list-style-type: none"> It was noted that clarity is needed on potential IWP 4 and IWP-5. There was discussion at the subcommittee meeting about adding language regarding covering capital and operating costs associated with Task Force members worked with WTD staff to revise the policies for full MWPAAC consideration. WTD's Industrial Waste

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			<p>Program staff noted that the fees mentioned in the policies are separate, distinct fees: one is for the potential of developing a cost-recovery fee structure for high-strength discharges, and the other relates to fees for administering the Industrial Waste Program. Because of this, there are now two separate potential policies for consideration.</p> <ul style="list-style-type: none">• The updated potential policies are highlighted in yellow.
IWP-5. WTD shall periodically review and update the fee structures related to administering its industrial waste program.	<p>IWP-5. WTD shall review and update at least every five years the fees associated with the costs of administering the county’s industrial waste program. Program administration includes, but is not limited to, issuances of industrial discharge permits and authorizations, and inspection and monitoring of facilities.</p> <p>IWP-5. WTD shall ((periodically)) review and update the fee structures((related to administering its industrial waste program)) <u>for industrial dischargers at least every five years to ensure a fair and equitable cost recovery fee structure. The fee structures shall include but not be limited to the cost of addressing high-strength waste, biological oxygen demand, and total suspended solids.</u></p>	<p><i>August 12, 2015 discussion:</i> Task Force members suggested matching the timeframe for review of fee structures to the guiding principles that have been developed with the regional negotiating team. The guiding principles state the review should occur “at least every five years”.</p>	