Multijurisdictional Agreement (MJA) for Industrial Pretreatment Program

Pacific NW Pretreatment Workshop
Vancouver Water Resource Education Center
September 11-13, 2012

Dave Moss
Spokane County

Tim Pelton
City of Spokane

SPOKANE COUNTY and CITY OF SPOKANE
Today’s Presentation Topics

- Sewer Service Areas and Treatment Plants
- Historical Overview (1980 – present)
- Interlocal vs. Multijurisdictional Agreements
- Organization and Staffing
- Related Joint Efforts
- Q&A – Discussion
In 1999 we realized:
“we need more and better treatment at new location”

SPOKANE COUNTY and CITY OF SPOKANE
Historical Overview *(1980 – present)*

**City-County Interlocal Agreement (ILA) History**

- **1980:** Original City-County Wastewater Management Agreement
  - County agrees to purchase 10 MGD at SAWTP *(now RPWRF)*

- **1982:** Amend #1 – pipe and other modifications to provide capacity

- **1983:** Amend #2 – RPWRF modifications & SVI design to provide capacity

- **1986:** Amend #3 – City & County required to implement Pretreatment Program
  - City Program: implemented by City staff
  - County Program: implemented by Ecology staff

- **1996:** Amend #4 – County contracts with City for Pretreatment Assistance
Common Deficiencies in Interlocal Agreements

- Predates federal pretreatment program requirements
- Only addresses conditions for providing collection and treatment of wastewater such as:
  Capacity available, service fees, ownership, fiscal responsibilities for expansion of assets, total discharge limitations and duration of agreement
When are Multijurisdictional Agreements Necessary?

- When industrial dischargers are located outside the Control Authority’s (CA) legal jurisdiction = Extrajurisdictional Industrial Users

- Extrajurisdictional Industrial Users are subject to enforceable pretreatment standards and requirements per 40CFR Section 403.8(f)(1)

- Data for this presentation is from the June 1994 EPA Guidance Manual for Multijurisdictional Pretreatment Programs
Minimum Elements of a Multijurisdictional Agreement

- Contributing jurisdictions must agree to develop and maintain legal authority to enforce the approved pretreatment program within their geographical boundaries (sewer use ordinance)

- For each industrial user some municipal entity must have the responsibility to implement and enforce the approved pretreatment program (either the CA or the jurisdiction)
Historical Overview (1980 – present)

City-County Multijurisdictional Agreement History

- 2006-2010: City and County prepare NEW Multijurisdictional Agreement
  - Stand-alone Agreement, pretreatment separated from the original ILA
  - Five-year duration with renewal provisions

- 2010-2011: MJAs executed with other jurisdictions:
  - City of Millwood – Spokane County
  - City of Airway Heights – City of Spokane
  - City of Spokane Valley – City of Spokane
  - Fairchild Air Force Base – City of Spokane (by permit)
Elements in the Spokane City-County MJA

- Legal Authority
  - Sewer Use and Pretreatment Ordinance
  - Virtually identical ordinances

- Local Discharge Limits
  - Limits for RPWRF (*City treatment plant*)
  - Limits for SCRWRF (*County treatment plant*)

- Transfer of Records

- Remedies for Breach
Elements in the Spokane County-City MJA (continued)

- Compliance Monitoring
  - Right of Entry
  - Inspection and Sampling
- Enforcement
  - Who is responsible
- Control Mechanisms
  - Who is responsible
- Residential Areas (not used at this time for our situation)
ICR = Inside City Regulatory Area + City Service Area + City-owned Sewers

OCR = Outside City Regulatory Area + City Service Area + City-owned Sewers

COS = County Regulatory Area + County Service Area + County-owned Sewers

Flows only to RPWRF
## Responsibility Matrix (2010-2011)

<table>
<thead>
<tr>
<th>FLOW AREA</th>
<th>TREATMENT PLANT</th>
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SPOKANE COUNTY and CITY OF SPOKANE
THERE’S A NEW PLANT IN TOWN!

Dedication: December 1, 2011
Historical Overview (1980 – present)

City-County Multijurisdictional Agreement History

- 2011-2012: City and County update MJA for two treatment plants
Conveyance System Configuration
Flows to either WRF

ICC = Inside City Regulatory Area + City Service Area + City-owned Sewers

OCC = Outside City Regulatory Area + City Service Area + City-owned Sewers

COC = County Regulatory Area + County Service Area + County-owned Sewers

Only to RPWRF - ICR | OCR | COS

SPOKANE COUNTY and CITY OF SPOKANE
# Responsibility Matrix (2012 →)

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Organization – Spokane County

N. Bruce Rawls, P.E.
Utilities Director

K. David Moss, P.E.
Pretreatment Coordinator

Stela Matei, P.E.
Pretreatment Engineer

Staff Assistant Support

Attorney Enforcement

City of Spokane / CH2M Hill
Technical and Lab Support

On-Call Pretreatment Technical Support Consultant Contract
Organization – City of Spokane

Pretreatment Coordinator
(Tim Pelton, Plant Superintendent of Technical Programs)

Laboratory Supervisor
(Mike Cannon)

Laboratory Technician for flow monitoring and sampling
(Gary Bussiere)

Laboratory Technician for flow monitoring and sampling
(Kyle Arrington)

Pretreatment Chemist
(Wil Hardy)

Pretreatment Chemist
(Dano Cummings)

Pretreatment Chemist
(Angie Bosevich)

Laboratory Technician for assisting PT Chemist on IWS, BMPs, etc.
(Tracy Stevens)

Data Entry and Recordkeeping
(Linda Kibbey)
Related Joint Efforts

- Quarterly Coordination Meetings
- Permit Writing and Review (using templates)
- Training
- Program Elements Manuals
- Enforcement Response Programs
- Mercury Control and Abatement Plans
- Clean Domestic Sampling and Local Limits Development
- Public Outreach, BMPs, Brochures
Q&A – Discussion
Multijurisdictional Agreement (MJA)
for Industrial Pretreatment Program

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