

# REGULATORY UPDATE: SALINITY

## WESTCAS ANNUAL CONFERENCE

### JUNE 21, 2018

# OVERVIEW

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- **ADOPTED SALINITY POLICY**
- **ACTION ITEMS**
- **FOLLOW UP MEETINGS**
  - NACWA Meeting with EPA
  - Water Week DC Fly-in

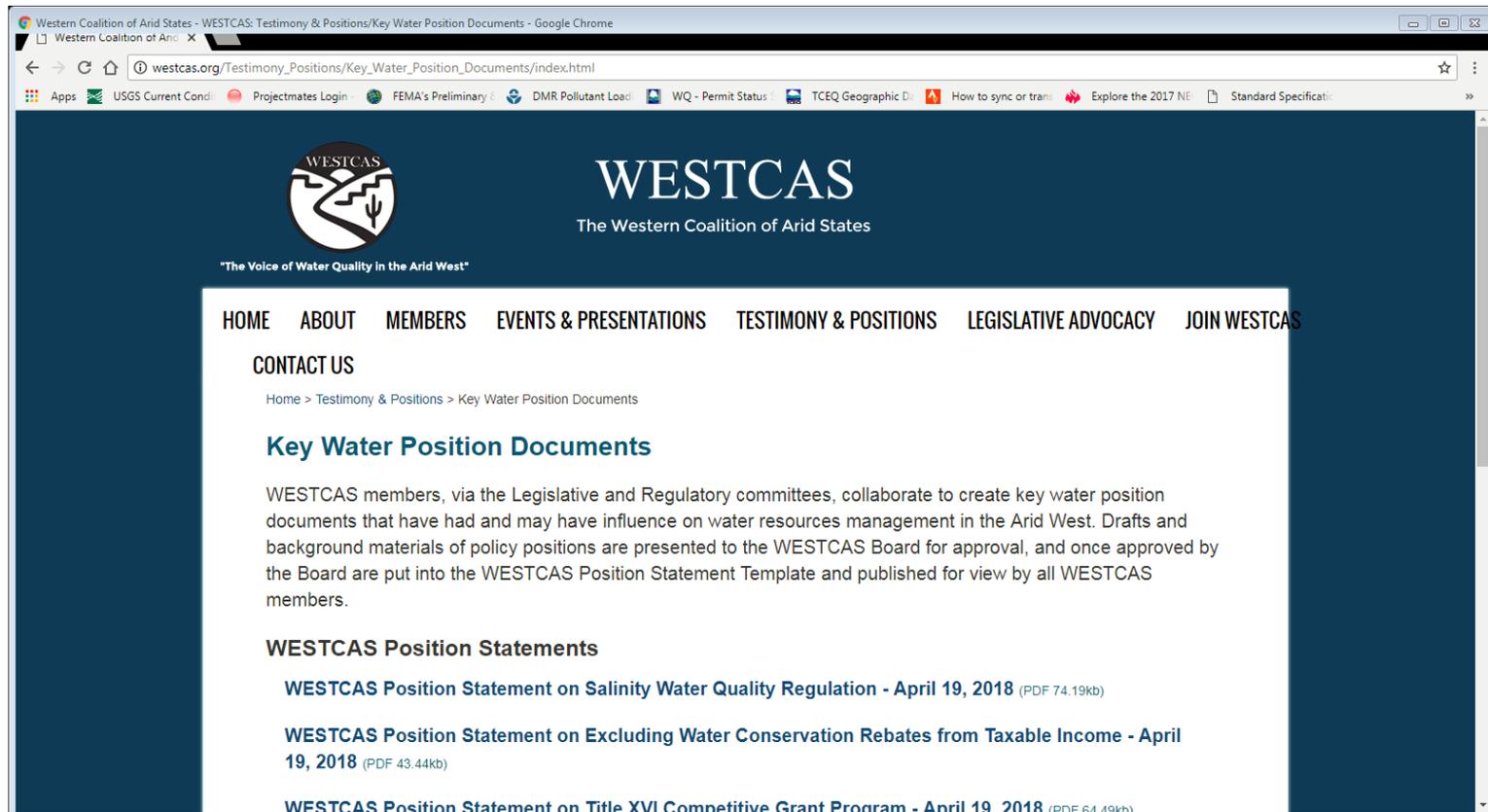


# SALINITY COMMITTEE

- Nancy Keller and Andra Ahrens (Pueblo, CO)
- Jane DeRose-Bamman (independent consultant, formerly ABCWUA)
- Justin Bern (Tempe, AZ)
- Kelly Collins (Carollo Engineers)
- Steve Bigley (Coachella Valley Water District)
- Chris Pasch (APAI)



# ADOPTED SALINITY POLICY



Western Coalition of Arid States - WESTCAS: Testimony & Positions/Key Water Position Documents - Google Chrome

westcas.org/Testimony\_Positions/Key\_Water\_Position\_Documents/index.html

Apps USGS Current Condi Projectmates Login FEMA's Preliminary DMR Pollutant Load WQ - Permit Status TCEQ Geographic D How to sync or tran Explore the 2017 NE Standard Specificati



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The Western Coalition of Arid States

"The Voice of Water Quality in the Arid West"

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## Key Water Position Documents

WESTCAS members, via the Legislative and Regulatory committees, collaborate to create key water position documents that have had and may have influence on water resources management in the Arid West. Drafts and background materials of policy positions are presented to the WESTCAS Board for approval, and once approved by the Board are put into the WESTCAS Position Statement Template and published for view by all WESTCAS members.

### WESTCAS Position Statements

- [WESTCAS Position Statement on Salinity Water Quality Regulation - April 19, 2018](#) (PDF 74.19kb)
- [WESTCAS Position Statement on Excluding Water Conservation Rebates from Taxable Income - April 19, 2018](#) (PDF 43.44kb)
- [WESTCAS Position Statement on Title XVI Competitive Grant Program - April 19, 2018](#) (PDF 64.49kb)



# ADOPTED SALINITY POLICY

- **Draft reviewed at February 21, 2018**
- **Further development by the committee.**
- **Adopted by the Board April 19, 2018.**



# SALINITY POLICY – ACTION ITEMS

## ■ Standards

- Not TDS or conductivity, but numeric standard for ions or combinations.
- Allow States and Tribes to implement Iowa approach in setting standards.
- Establish standards appropriate for the arid west.
- Standards should protect potable water supplies, irrigation usage, and/or livestock watering.
- Exemption for passing WET
- Allow flexibility in setting standards for sources naturally high.
- Provide for exemptions during drought or extended dry periods.



# SALINITY POLICY – ACTION ITEMS

## ■ Procedures for Developing Permits

- Exempt municipal discharges if the (increase : long term average) < established amount.
- Lower the barriers to obtaining and renewing a discharger-specific variance.
- Allow consideration of net environmental benefit.
- Increase flexibility. (Ex: regulate TDS through a combination of a variance and a pollutant management plan rather than a numeric permit limit.)
- Allow for longer averaging periods when droughts occur.



# WESTCAS ACTIONS

- **Monitor the development of scientific research of the effects of dissolved salts on aquatic life.**
- **Exempt municipal discharges if the (increase : long term average) < established amount.**
- **Look for options to communicate with the US EPA**
- **Allow consideration of net environmental benefit.**
- **Monitor development of treatment technology.**
- **Coordinate with other organizations, including the National Association of Clean Water Agencies, on working to develop practical short- and long-term solutions.**



# FOLLOW UP MEETINGS

- **March 15, 2018: NACWA Meeting at EPA Headquarters (memo provided to WESTCAS).**
  - EPA Headquarters was unaware that compliance with water quality standards for dissolved salts is a major issue for permittees across the country and that providing treatment is a major barrier.
  - They also were not aware of the many different types of sources of dissolved salts that are a problem.
  - They seemed open to a continuing dialog regarding how to approach standards and permits for dissolved salts while, and after, ORD develops criteria.
  - Following up on this may involve additional dialog on the variance process, and possibly the total maximum daily load (TMDL) process since this was also mentioned as a potential tool – in addition to the development of Cl and SO<sub>4</sub> criteria.



# FOLLOW UP MEETINGS

- **March 15, 2018: NACWA Meeting at EPA Headquarters (memo provided to WESTCAS).**
  - Action items:
    - EPA Headquarters will communicate through Chris Hornback at NACWA.
    - Barbara Behl will contact ORD and obtain more information on what they are doing and what their plans are.
    - Chris Hornback will seek information on the results of adoption of the revised criteria by Iowa, Illinois, and Pennsylvania.
    - Permittees should explore whether they consider the Federal concept of variances as a viable approach.
    - Need to review recent EPA changes to TMDL regulations and how they apply to salinity.
    - NACWA to follow up in one month to find out about discussions with ORD.



# FOLLOW UP MEETINGS

- **Water Week DC-Fly-in**
  - Deborah Nagle volunteered the information that the TDS issue had been brought to their attention, and the EPA Office of Research and Development was giving higher priority to developing standards for the principal dissolved salts ions.
- **NACWA Water Quality Committee on May 16, 2018,**
  - The committee members agreed that this is a national problem.
  - It will continue to be a priority item for them.
  - NACWA is firmly behind the effort.

