



Focus

Reduction of Monitoring for Good Performance at Wastewater Discharge Permit Facilities

Good Performance Means Less Monitoring

The Washington Department of Ecology has adopted a policy which is designed to encourage better performance of wastewater treatment plant operations. Wastewater treatment facilities may become eligible for a reduction in compliance monitoring if they go at least two years without violations of their permit limits. The frequency of compliance monitoring may be reduced upon request for any parameter which meets certain requirements specified below. The amount of reduction is proportional to the performance. The policy is applicable to National Pollutant Discharge Elimination System permits for surface water discharge and state permitted discharges to ground water and to municipal wastewater treatment plants. The policy is consistent with a recent United States Environmental Protection Agency policy and was developed with the assistance of the Permit Program Partnership. The Partnership is an advisory committee to Ecology on wastewater discharge permit issues. The Partnership made a recommendation to the Ecology to implement reduced monitoring for good performance as a response to compliance incentives. Reduced monitoring based on good performance may have significant cost savings to cities and businesses.

How to Qualify for Reduced Monitoring

Any facility with a good record of compliance with its monthly average, weekly average, or daily maximum effluent limitations is eligible for the reduction of monitoring frequency of any parameter. Compliance includes monthly average, weekly average, and daily maximum. A monitored parameter is eligible if there is a 99 percent compliance rate for that parameter during the past two years.

Facilities with significant compliance problems are not eligible. Significant compliance problems include: criminal conviction under federal or state environmental laws, failure to comply with provisions of an administrative order or to pay an assessed penalty, loss of lab accreditation for not performing to standards, and submittal of invalid data documented by an Ecology inspection. If some of these compliance problems are historical, the facility may still qualify depending on the time frame and severity of the situation.

A monitoring reduction based on effluent data which has not been continuously reported during the two-year period or which is interrupted or discontinuous, intermittent, short-term, or based on batch discharges will be considered on a case-by-case basis. These cases will require performance data for longer than two years to determine a long term average.

Ecology will also evaluate the discharge situation when considering monitoring reduction. For example, discharges to a shellfish area will generally not be considered for reduction in fecal coliform monitoring. Ecology will evaluate the prospect of the permit holder maintaining good performance during the life of the permit.

Municipalities or industries with new discharge permits will be eligible for reduced monitoring after meeting the two year compliance requirement. Normally, the reduced monitoring provisions would be applied after one permit cycle of five years and permit reissuance.

Current Situation

Ecology will generally make a decision on reducing a facility's monitoring requirements when a permit is renewed. However, permit holders may request a reduction at any time during the permit cycle. Reduction of monitoring frequency during the permit cycle is a major modification and requires public notice.

The reduction of monitoring frequency is dependent upon the performance at the facility measured as the long-term average for the parameter divided by the average monthly effluent limit (Table 1). Violations during the period of reduced monitoring may cause Ecology to increase the monitoring frequency by permit modification or administrative order.

Facilities which satisfy the entry criteria but are not experiencing discharges of 75 percent or less of their permitted levels of water quality-based parameters may still be eligible for reductions in monitoring frequencies. Monitoring will only be reduced for such parameters if the facility can demonstrate a coefficient of variation (ratio of standard deviation to the mean) of 0.20 or less and no monthly average limit violation for the two-year averaging period. Ecology will allow the reduction as shown in Table 2 below.

This policy is explained in greater detail in the Permit Writer's Manual (Ecology Publication No. 92-109). For more information contact your facility's permit manager or Gary Bailey (360/407-6433). For more information on Compliance Incentives call Dan Wrye (360/407-6459).

Table 1. Allowable Monitoring Frequency Based on Ratio of Long-Term Effluent Average (LTA) to the Average Monthly Limit (AML)

Baseline Monitoring	Ratio (LTA/AML)			
	75-66%	65-50%	49-25%	<25%
7/wk	5/wk	4/wk	3/wk	1/wk
6/wk	4/wk	3/wk	2/wk	1/wk
5/wk	4/wk	3/wk	2/wk	1/wk
4/wk	3/wk	2/wk	1/wk	1/wk
3/wk	3/wk	2/wk	1/wk	1/wk
2/wk	2/wk	1/wk	2/mo	1/2 mo
1/wk	1/wk	1/wk	2/mo	1/2 mo
2/mo	2/mo	2/mo	2/mo	1/4 mo
1/mo	1/mo	1/mo	1/4 mo	1/6 mo
7/wk	5/wk	4/wk	3/wk	1/wk

Table 2. Allowable Monitoring Reduction With a Ratio of Long-Term Effluent Average to Monthly Average Limit 100-76% and a CV of 0.2 or Less.

Baseline Monitoring	Reduced Monitoring
7/wk	6/wk
6/wk	5/wk
5/wk	4/wk
4/wk	4/wk
3/wk	3/wk
2/wk	2/wk
1/wk	1/wk
2/month	2/month
1/month	1/month