



A Proven Regulatory Strategy for Nutrient Removal at Water Resource Recovery Facilities

NEWEA Boston

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Four State Funded WWRF Nutrient Optimization Programs

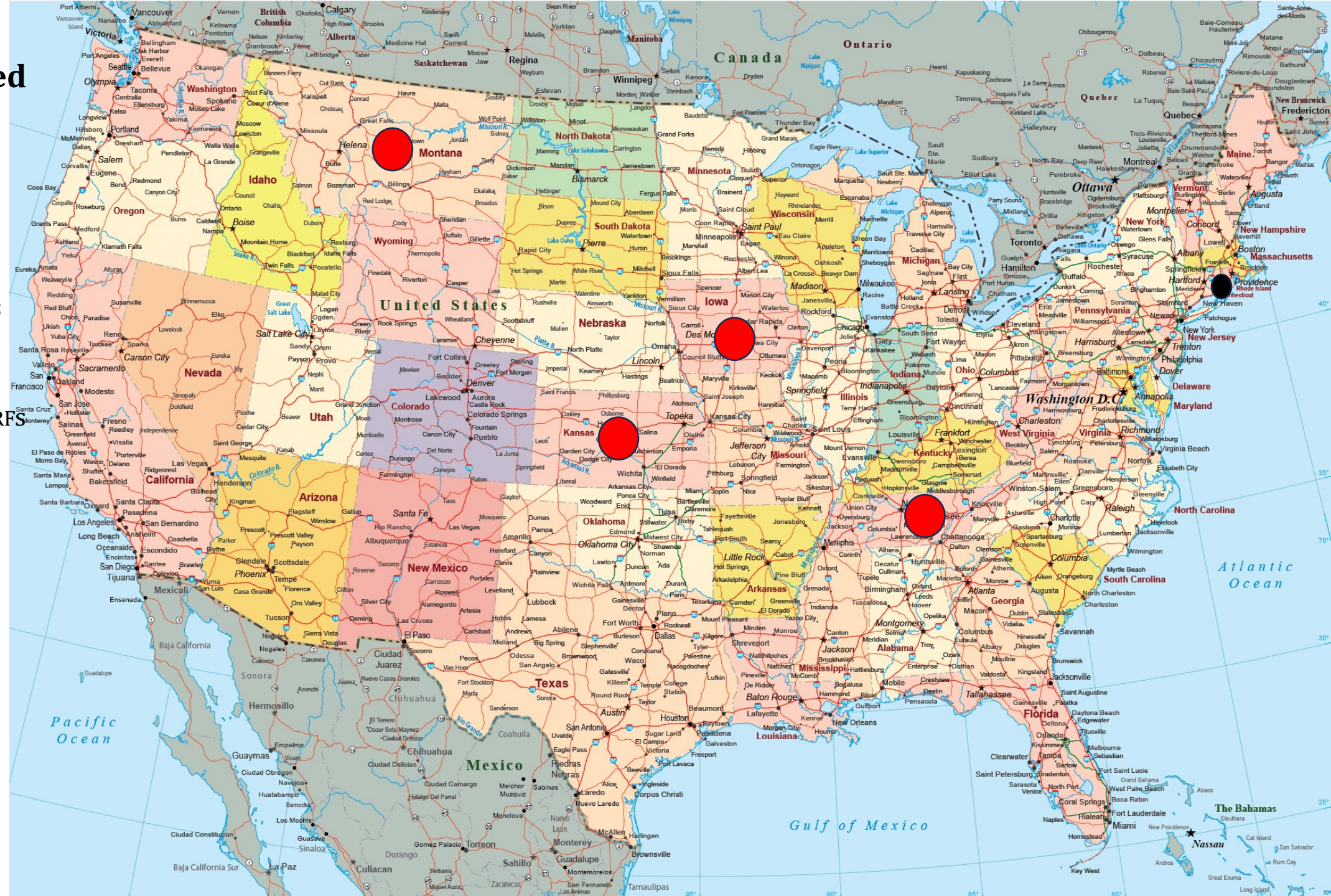
Montana 32 WWRFs

Kansas 73 WWRFs

Tennessee 21 WWRFs

Iowa 19 WWRFs

145 WWRFs





CHANGE

SAME

PROVEN REGULATORY STRATEGY

Before writing permit limits ...

Free **Operator Training** (in-class &/or webinar)

Free **WRRF Site Visits** (state regulators & consultant) ...

- (a) review historical data
- (b) discuss N&P removal science
- (c) suggest optimization strategies
- (d) listen to operator experiences / plant limitations
- (e) select a lets-try-this strategy

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Free **Post-Visit Support** ...

- (a) written step-by-step recommendations with monitoring protocols & process control targets
- (b) ongoing support (in-plant and remote) including (in some cases) loaner field testing instruments

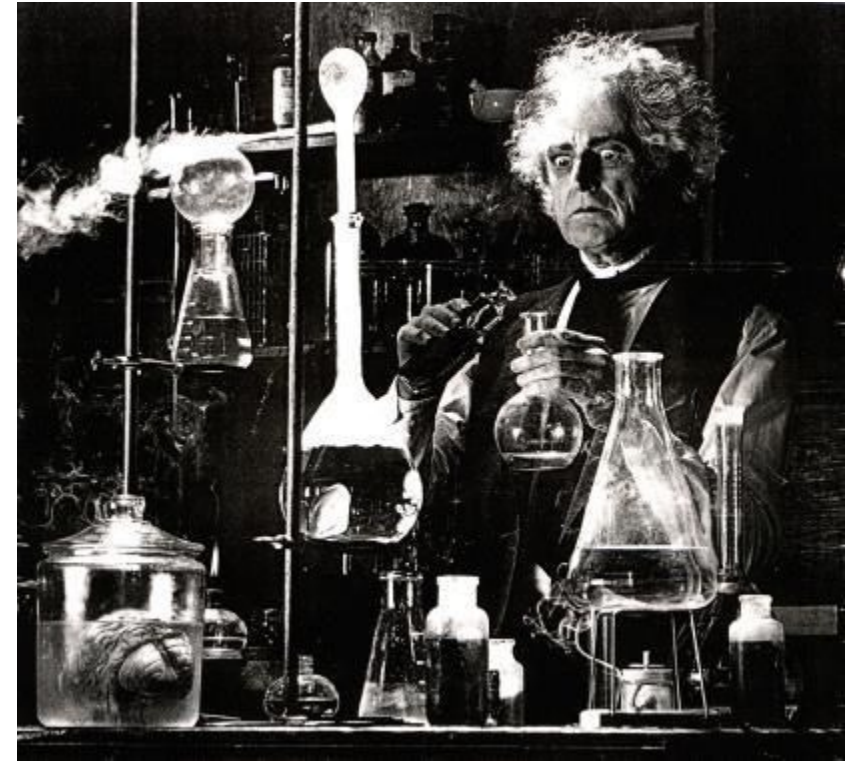
The Science behind Optimization: Create the Five Habitats that Support Nitrogen and Phosphorus Removal

Nitrogen Removal

1. Oxygen-Rich / BOD-Poor Environment for Converting Ammonia to Nitrate
2. Oxygen-Poor / BOD-Rich Environment for Converting Nitrate to Nitrogen Gas

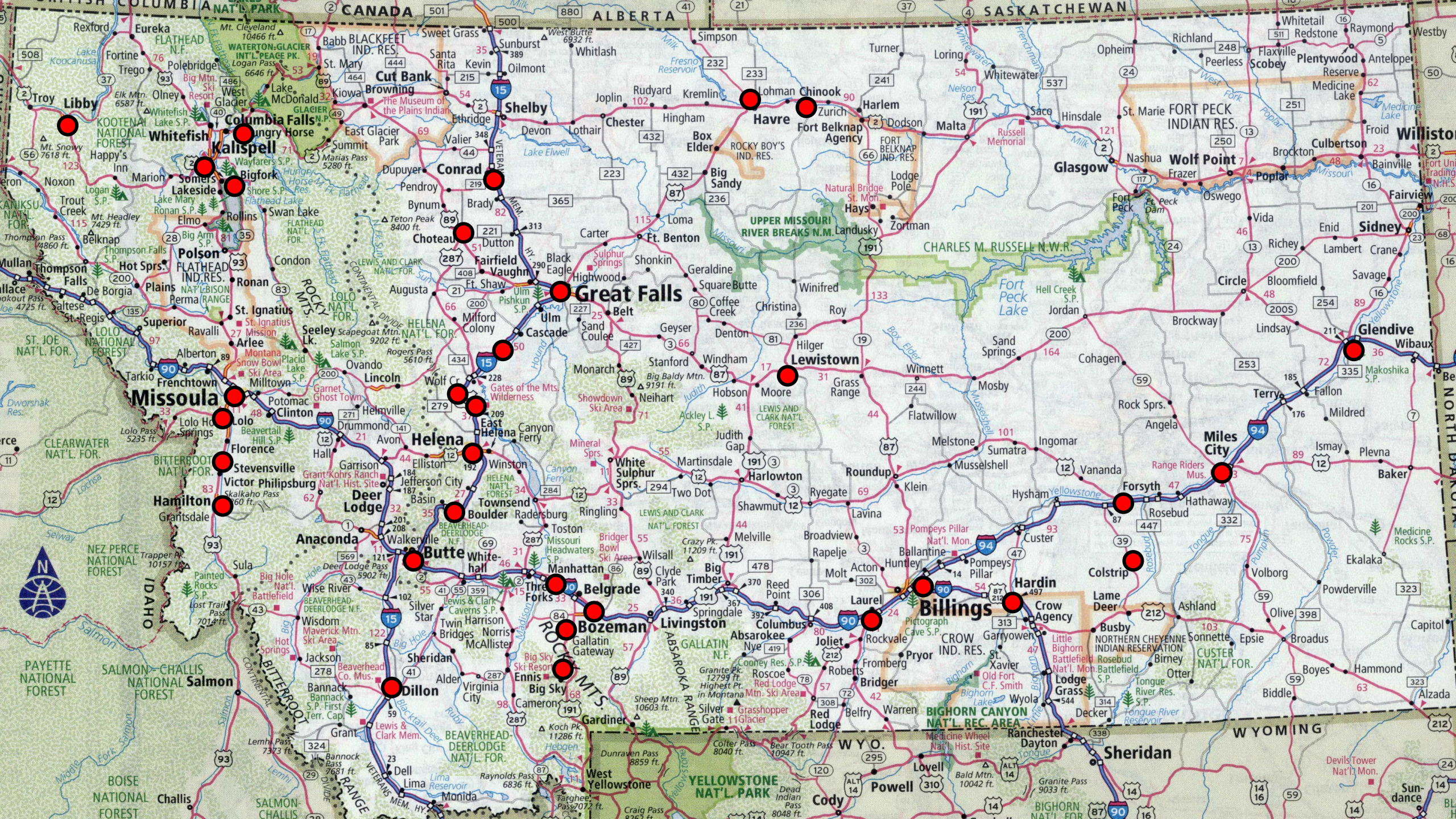
Phosphorus Removal

3. BOD-Rich Septic Environment for Creating VFAs
4. VFA-Rich Septic Environment to Energize PAOs
5. Oxygen-Rich / Moderate BOD Environment for Growing PAOs



MONTANA





August 11, 2022

Low-Cost Nutrient Removal in Montana

Final Report



DEQ Montana Department of
Environmental Quality

“Overall, *18 of 20 facilities (90%) that were optimized, but not upgraded to further reduce nutrients realized a reduction in discharge of nitrogen and/or phosphorus to Montana’s waters.*

The reductions were significant - ***127 tons per year of nitrogen and 19 tons per year of phosphorus.***”



Conrad, Montana

(0.5 MGD Extended Aeration)

Nitrogen

Before: 30 mg/L

After: 8 mg/L

Phosphorus

Before: 3.0 mg/L

After: 0.5 mg/L

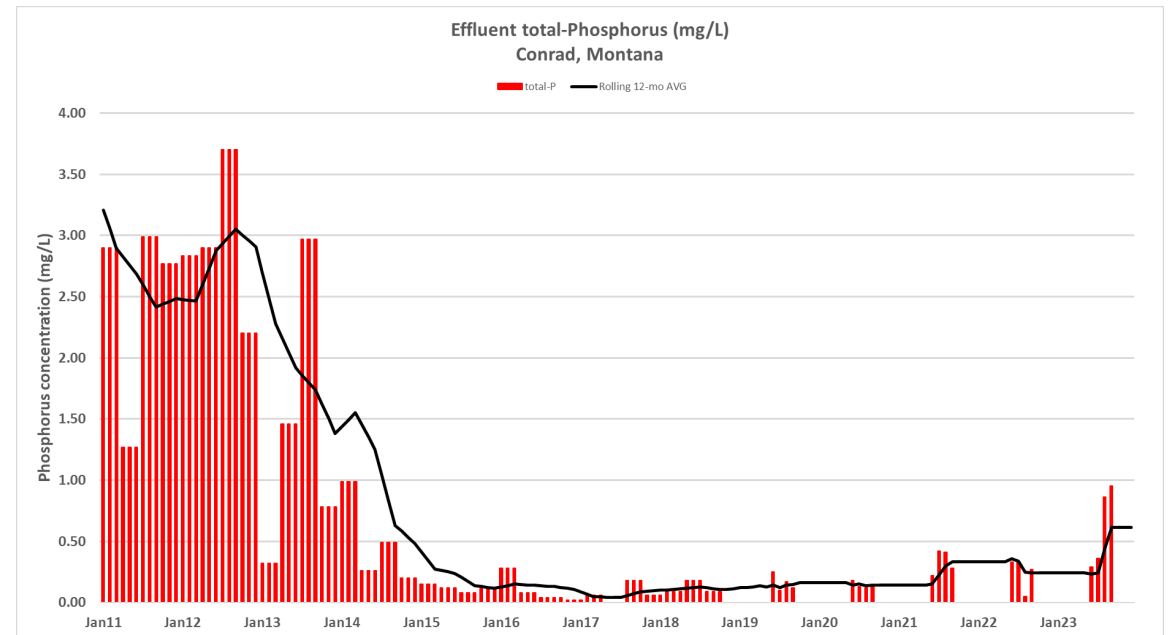
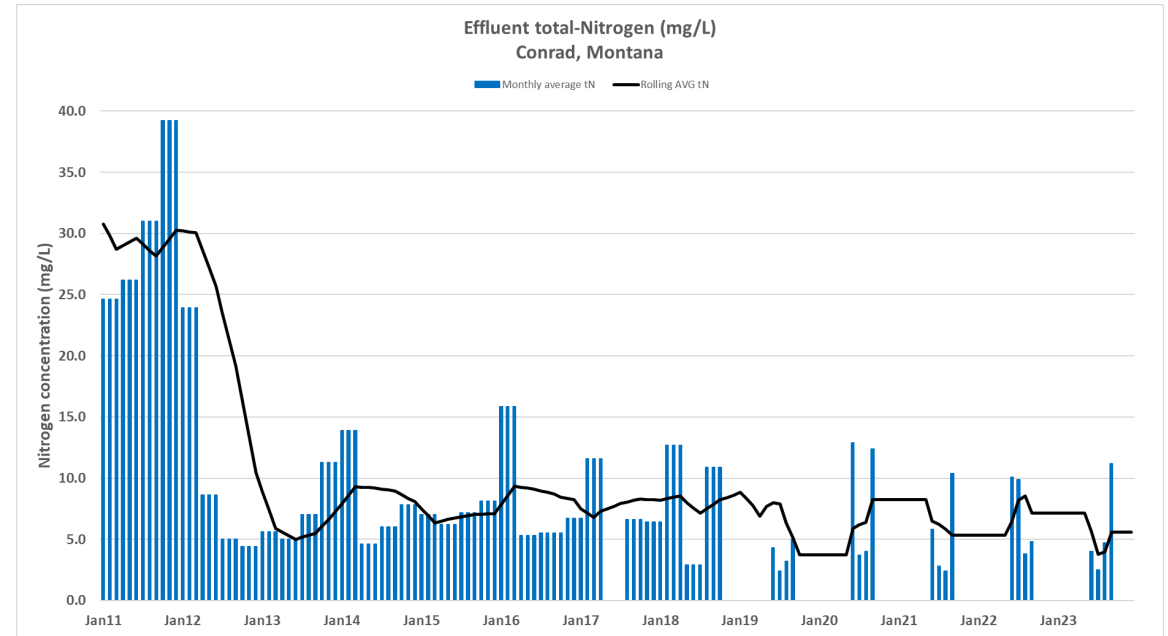
Costs / Savings

\$1,500 spent on field testing equipment

Sustainable

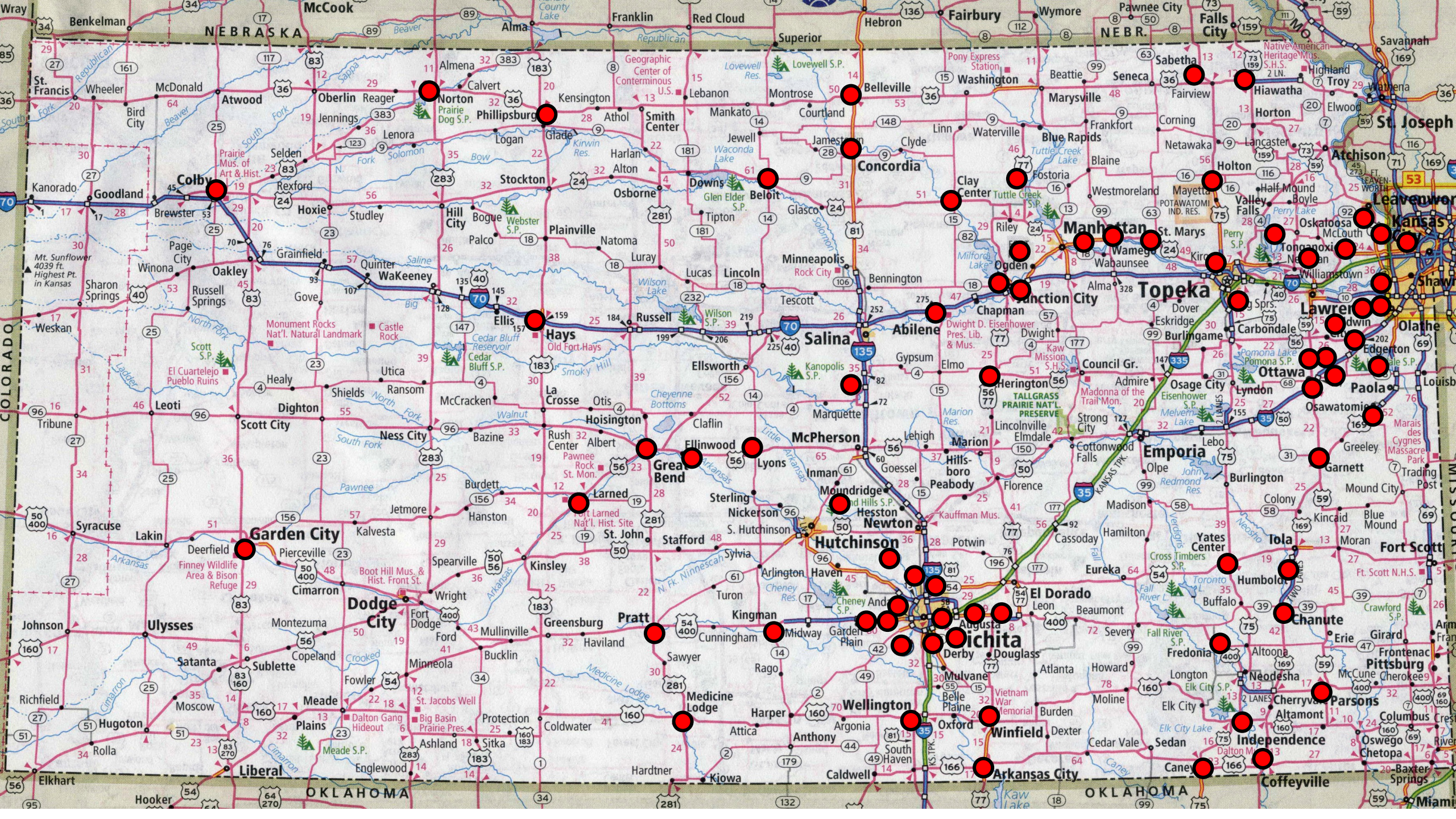
No new construction

Less electricity is used

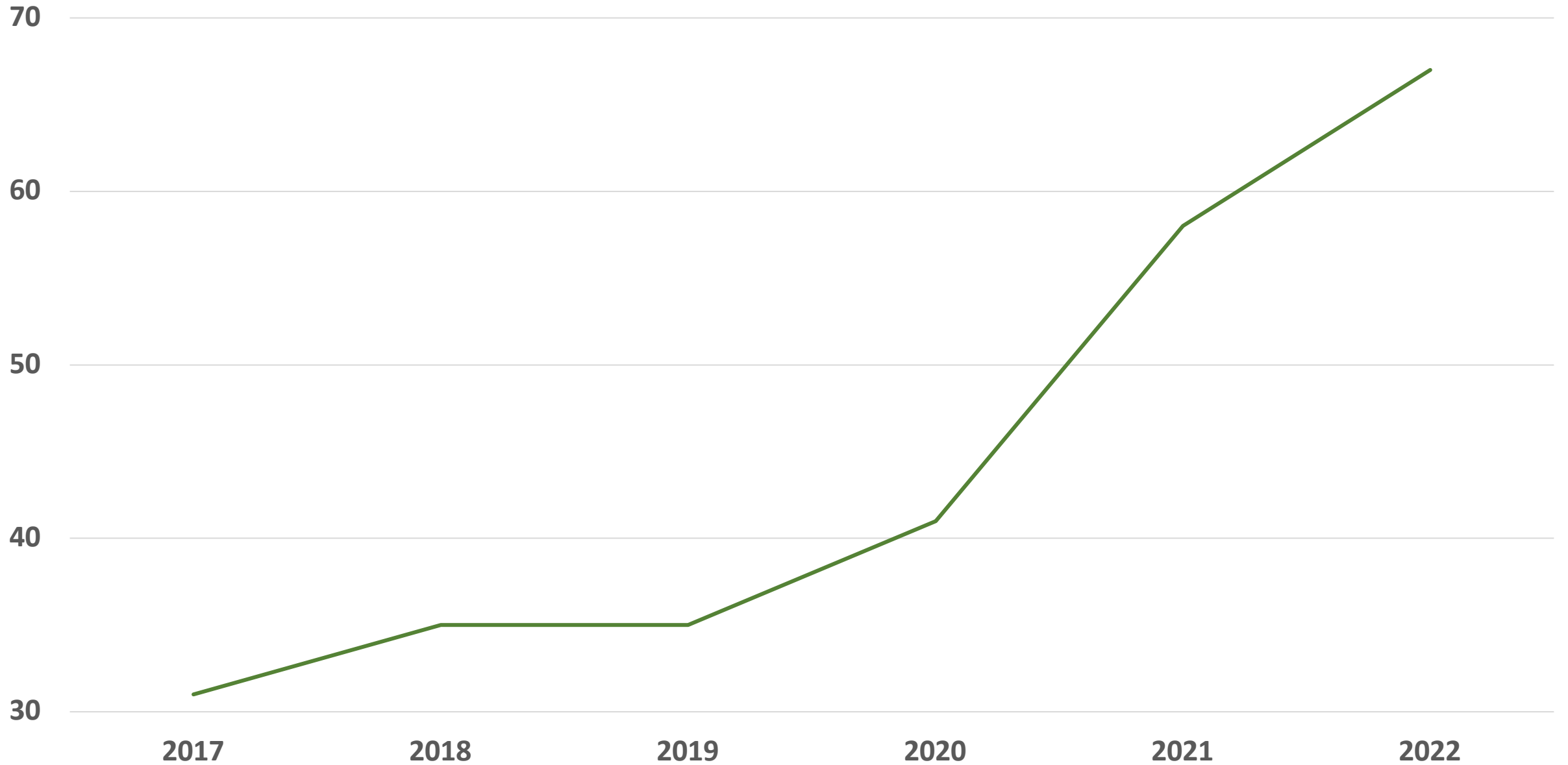


KANSAS





Number of Kansas WWRFs with tN < 10 mg/L &/or tP < 1.0 mg/L



2nd St

Great Bend
Sewage Treatment



Great Bend, Kansas

(3.6 MGD Oxidation Ditch)

Nitrogen

Before: 12 mg/L

After: 5 mg/L

Phosphorus

Before: 2.5 mg/L

After: 0.6 mg/L

Costs / Savings

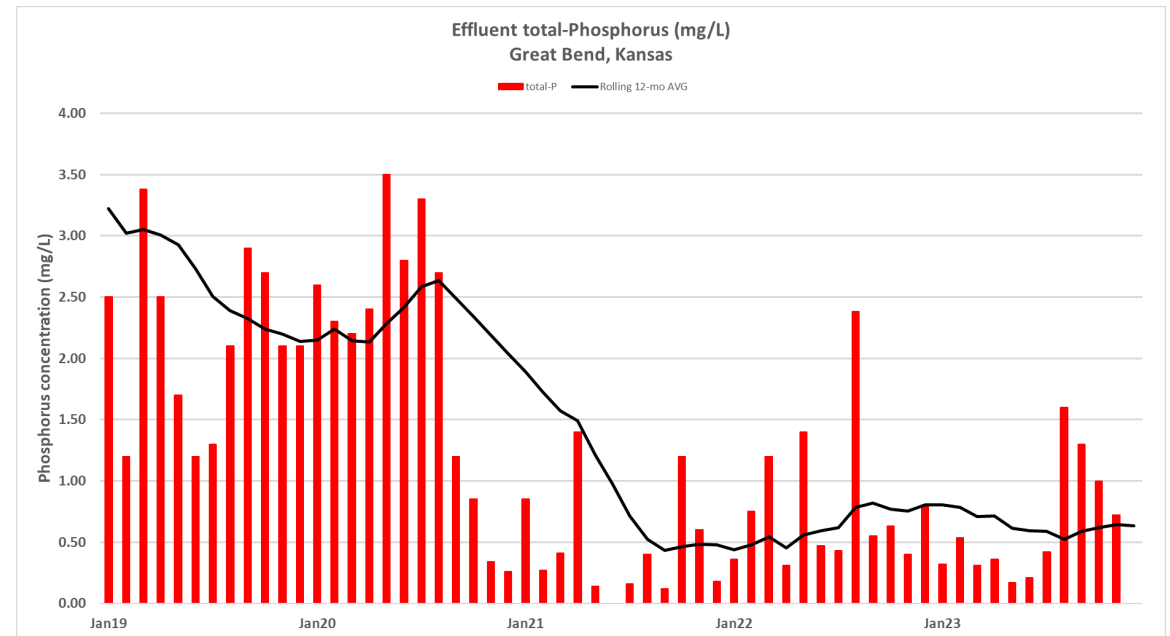
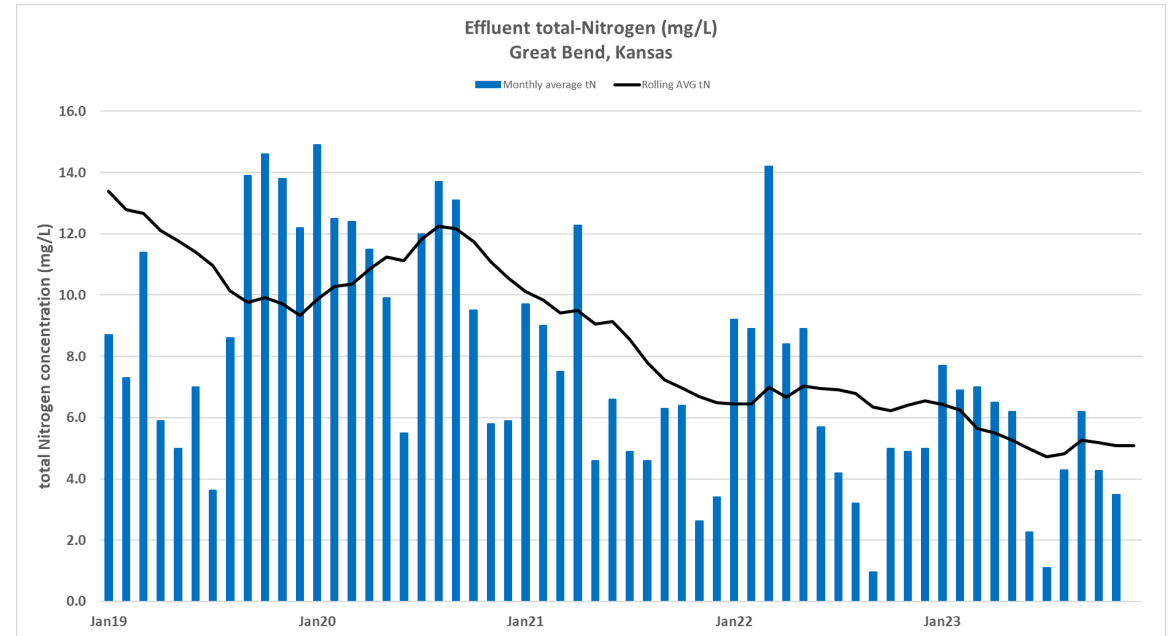
\$50K spent on VFDs & SCADA programming

\$6 million facility upgrade no longer necessary

Sustainable

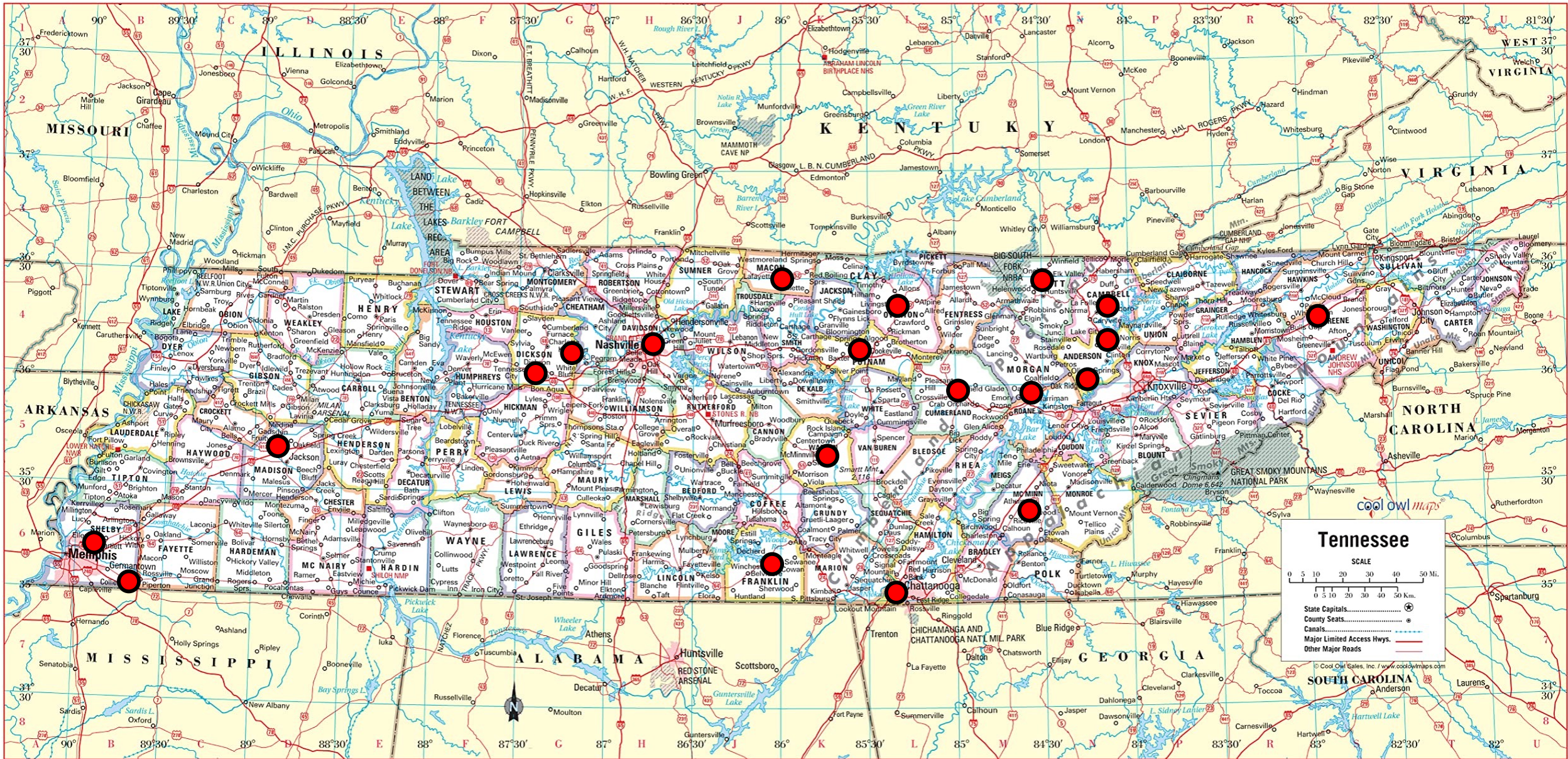
No new construction

Less electricity is used





TENNESSEE



Tennessee

SCALE
0 5 10 20 30 40 50 Mi.
0 5 10 20 30 40 50 Km.

- State Capitals.....
- County Seats.....
- Canals.....
- Major Limited Access Hwys.
- Other Major Roads

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Cookeville, Tennessee

(15 MGD Oxidation Ditch)

Nitrogen

Before: 15 mg/L

After: 5 mg/L ... 10 mg/L

Phosphorus

Before: 1.75 mg/L

After: 1.25 mg/L ... 1.75 mg/L

Costs / Savings

\$10K spent on aeration timers & in-house lab equipment

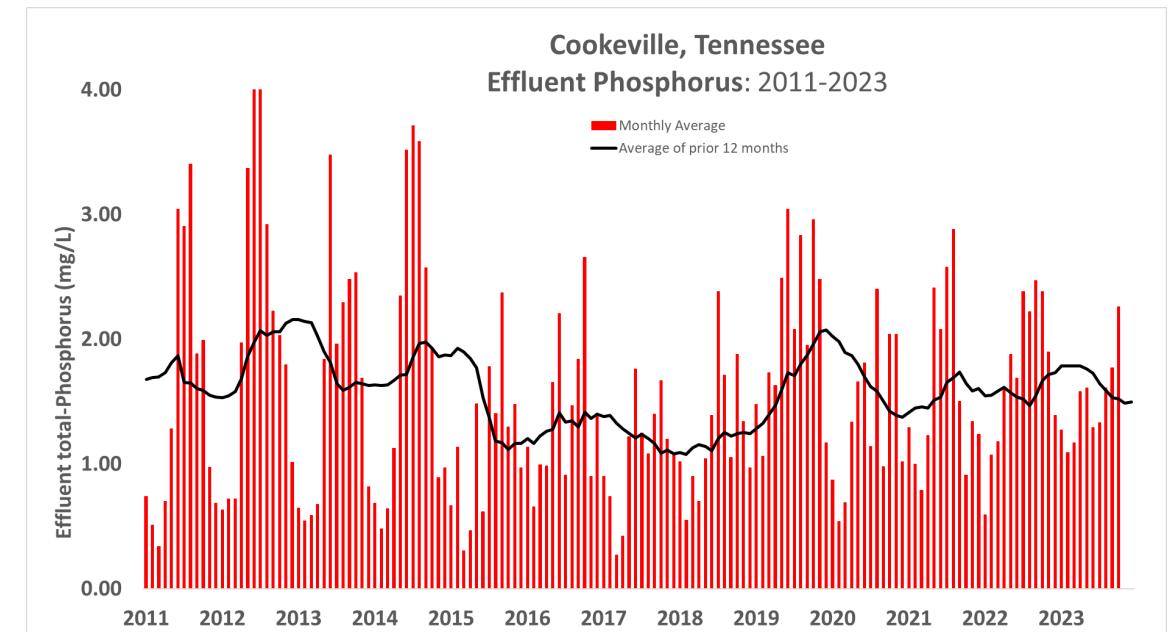
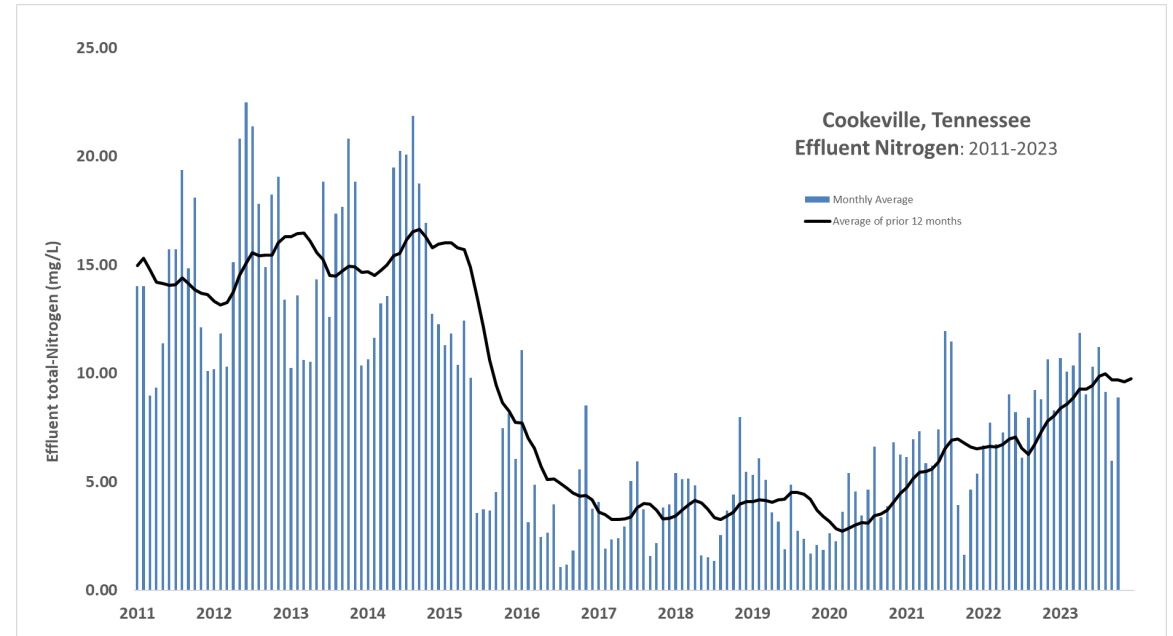
\$250,000+ per year electrical savings

\$4+ million facility upgrade no longer necessary

Sustainable

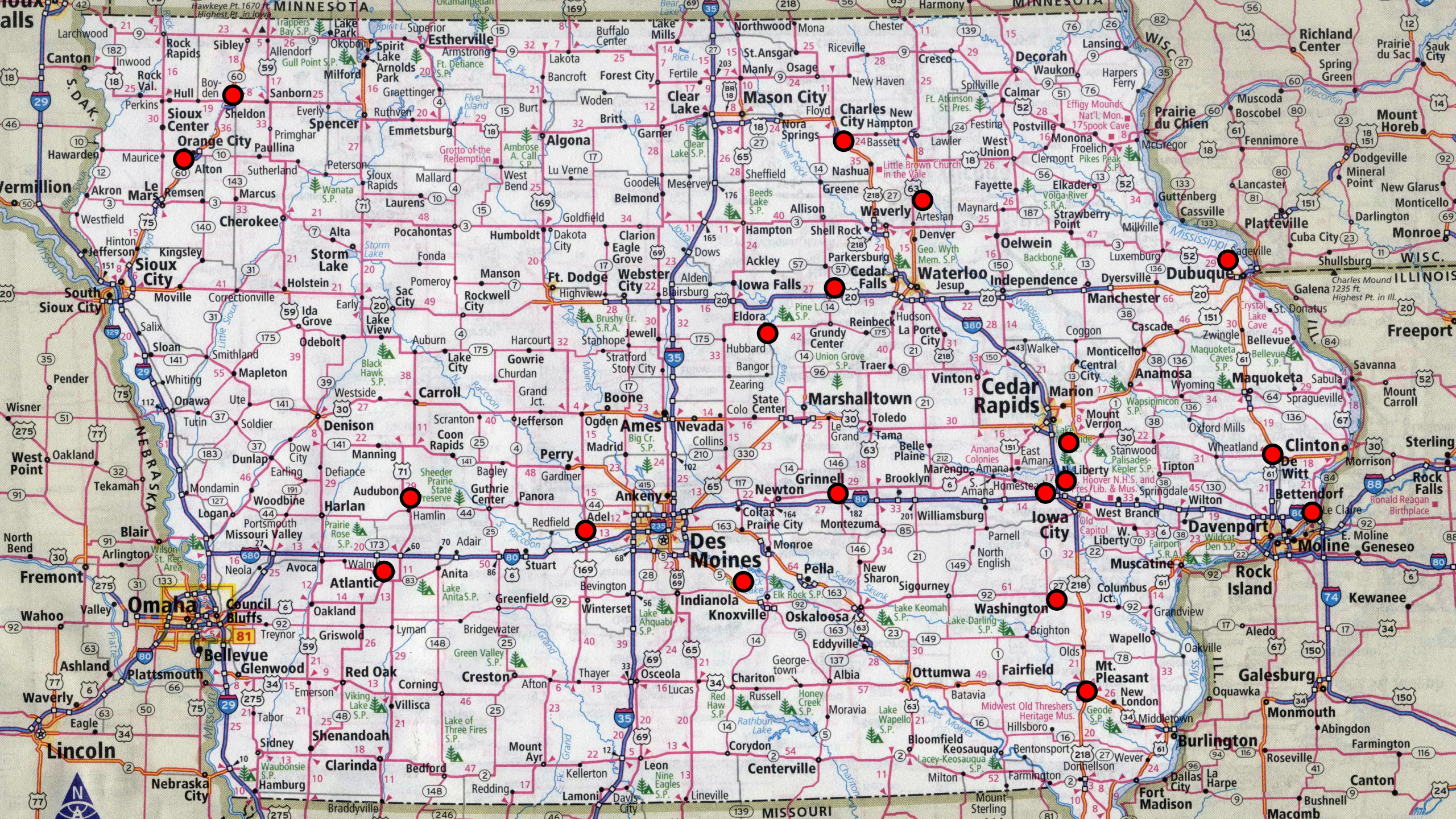
No new construction

Less electricity is used



IOWA







East Nishnabotna River

City of Atlantic
Animal Shelter

City of Atlantic WPCD

Sunnyside Ln

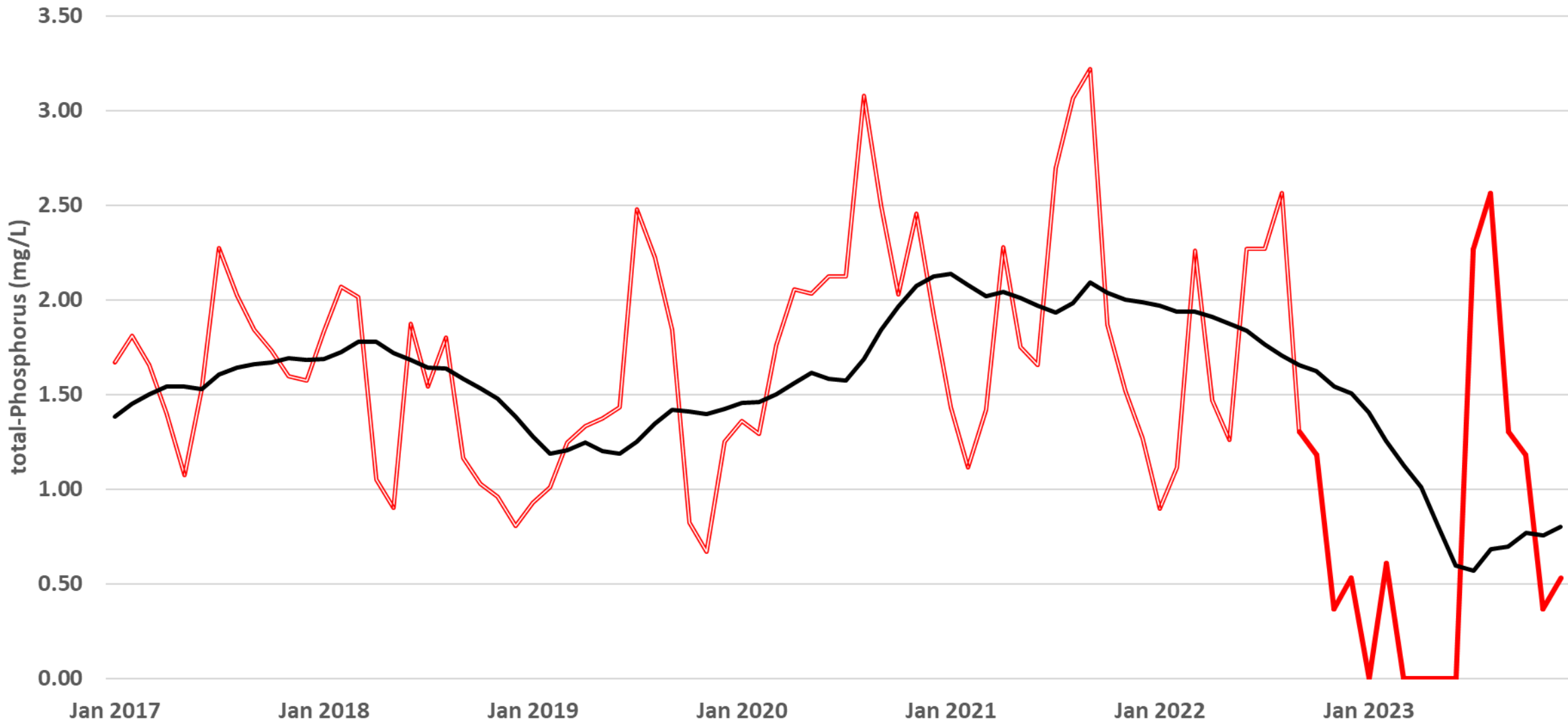
Sunnyside Ln

Sunnyside Ln

Nishnabotna River

Atlantic, Iowa Effluent total-Phosphorus (mg/L)

— monthly average — 12-month avg



Results / Big Picture:

Up to one-third of municipalities embraced optimization

Statewide 25% Reductions in tN & tP (Montana)

Twice as many WRRFs meeting nutrient targets (Kansas)

Optimized WRRFs ...

50% reduction in effluent total-Nitrogen, up to 90%

50% reduction in effluent total-Phosphorus, up to 90%

Energy savings as creating optimal habitats for tN & tP involves less aeration

Facility Upgrade savings

Making for ...

Cleaner water sooner

Sustainably



Cost:

Less than \$6,000 per WRRF

Funding Sources:

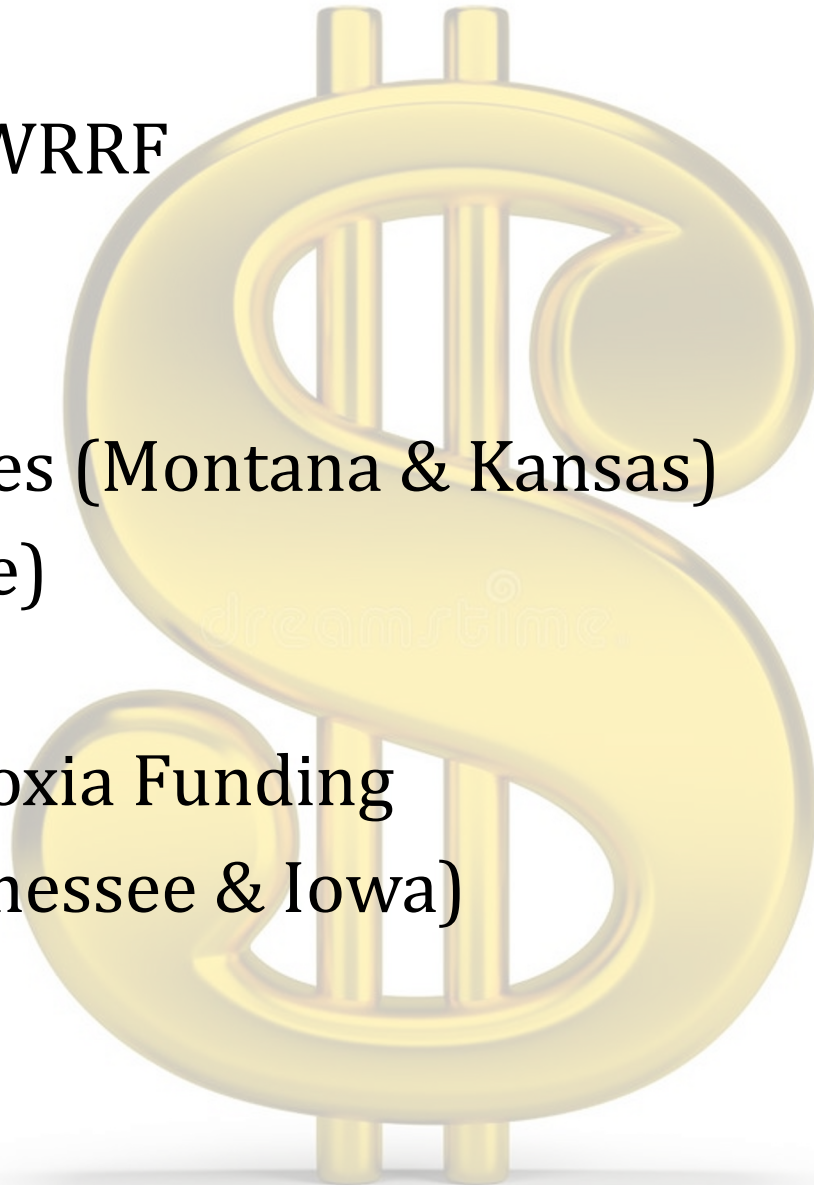
SRF Administration fees (Montana & Kansas)

EPA Grants (Tennessee)

604(b) SRF Funds

Gulf of Mexico Hypoxia Funding

State Legislature (Tennessee & Iowa)



Regulatory take-aways

Before permit limits are written,
Encourage Optimization by ...

Supporting Experimentation vs.
Review and Approve Formal Plan

Discretionary Enforcement including
“Safe Harbor” letters vs. Enhanced
Enforcement

Reward Good Performance vs. Lower
Permit Limits “because you can”





REGULATORY SUPPORT MAKES FOR CLEAN WATER

Grant Weaver
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Acknowledgements

MONTANA

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KANSAS

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TENNESSEE

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IOWA

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Tim Snyder of **City of Atlantic**

... and **everyone who makes water clean!**

