



Regulators Roundtable

NEWEA Annual Conference

January 22, 2024

Tracy L. Wood, PE
Administrator,
Wastewater Engineering Bureau
NHDES Water Division

NPDES Updates

- **Recently issued general permits (GP)**
 - 2023 Potable Water Treatment Facility GP – Effective 10/1/23
 - 2023 Hydroelectric Generating Facilities GP – Effective 4/1/23
 - 2022 Dewatering and Remediation GP – Effective 8/31/22
 - Combined Dewatering GP and Remediation GP
 - 2021 Small WWTFGP – Design Flow <1MGD
 - Covers about 40 NH facilities between the final permit (effective 12/1/21) and the 2023 modification.
- **Upcoming general permits (GP)**
 - 2023 Non-Contact Cooling Water GP – End Public Comment Period 11/21/23
 - **Medium WWTFGP – Design Flow 1 to 5MGD**
 - **Future: Estimate will cover 18 NH facilities**
- **NH's NPDES Regulatory Universe**
 - 92 Municipal & Industrial Permits
 - 31 Hydros, 2 NCCW, 5 DRGP, 5 Potable Water GP & 5 Aqua GP
 - + 13 GBTNGP

More NPDES Updates

- **Compliance Schedules**
- **PFAS in NPDES Permits** [Frequent Questions about PFAS Methods for NPDES Permits | US EPA](#)
 - **When will EPA publish the final multi-lab validated method?**
 - EPA expects to issue the final version of Method 1633 in late 2023 and it will include multi-laboratory validation data for all of the remaining solid matrices and landfill leachate:
 - Final Method 1633: This version will include the quality control acceptance for all eight environmental matrices (**wastewater, surface water, groundwater, soil, biosolids, sediment, landfill leachate, and fish tissue**), derived from the multi-lab validation study. An accompanying DoD multi-laboratory validation study report will be made available that summarizes the results for the solid matrices and the landfill leachate matrix.
 - EPA decided to release multiple revisions of the draft method in response to stakeholder requests for the agency to update the method incrementally with the multi-laboratory data as soon as practicable. The final version of the method will not involve substantive changes to the analytical procedure.

NEW Adaptation Language

- **Adaptation Plan**
 - *Component 1: Identification of Vulnerable Critical Assets.* To include both baseline and future. Due 24 months from effective date of permit.
 - *Component 2: Adaptative Measures Assessment.* Due 36 months from effective date of permit.
 - EPA's Climate Resilience Evaluation and Awareness Tool (CREAT) Risk Assessment Application for Water Utilities, found on EPA's website Creating Resilient Water Utilities (CRWU) (<https://www.epa.gov/crwu>), or methodology that provides comparable analysis.
 - *Component 3: Implementation and Maintenance Schedule.* Due within 48 months from effective date of permit.
- *Credit for Prior Assessment(s) Completed.* For assessment(s) that were completed within 5 years of the effective date of the permit, or is [are] currently being undertaken an assessment that address some or all of the Adaptation Plan components.
- *Adaptation Plan Progress Report.* Due annually by March 31st.

For more information go to EPA's Region 1 NPDES website at:

<https://www.epa.gov/npdes-permits/npdes-water-permit-program-new-england>.

Upcoming EPA Training

- Are you interested in learning how to successfully develop an Adaptation Plan to meet operation and maintenance requirements for a wastewater treatment system and/or sewer system?
- The U.S. Environmental Protection Agency's (EPA) [Creating Resilient Water Utilities](#) (CRWU) initiative and EPA Region 1 is providing **free** online training for wastewater utility owners and operators in New Hampshire and Massachusetts that have been and/or will be issued NPDES permits that contain new major storm and flood event adaptation planning requirements.
- ***TWELVE (12) CREDIT HOURS/CONTINUING EDUCATION UNITS (CEUs) will be available for participating certified wastewater operators from Massachusetts and New Hampshire (applications pending). You must attend all 6 two-hour sessions to be eligible for the 12 credit hours/CEUs.*** An informational webinar flyer is attached.
- Register by March 4th.

NHDES CCVA Contract

CCVA Background

NHDES managed pilot program with contracted consultant, Weston & Sampson, to assess natural hazard vulnerabilities to wastewater and drinking water infrastructure.

Includes 9 participating communities (Keene, Hooksett, Salem, Milford, Plymouth, Dover, Exeter, Merrimack, Rochester).

Analysis takes into account historical events, current conditions, and future climate change projected conditions.

Final products: individualized reports to the communities w/ asset management program integration capability; NHDES summary report, state story map to help prioritize future efforts, and lessons-learned/suggested changes.

Current Status & Next Steps

Approximately half of the communities have completed site assessments, interviews, and surveys for the data collection component.

Weston & Sampson has completed development of the methodology for data analysis and for computation of the results/reporting.

Current contract completion date is December 31, 2024.

Rule Updates...in the queue

Env-Wq 1600
Septage Management

November 26, 2023

Env-Wq 700

Standards of Design and
Construction for Sewerage
and WWTFs

October 15, 2024

July 22, 2024

Env-C 500

Engineer Prequalification

- Update definition of professional competence – 2 qualified project engineers per category
- Update definition of qualifying project – as-builts required

January 1, 2026

Env-Wq 800

Sludge Management

- Eliminate Class B Biosolids – All Class A
- Require Similar Reporting Requirements for Class A as is for Class B

2023 CWSRF Funding

\$62M Total
(not incl.
“earmarks”)

\$16.95M
Maximum
Subsidy

“Earmarks”
\$9.935M

20% Match
Required



Base
\$7,496,000
Cap Grant
\$1,499,200 State
Match (20%)

10-40% Subsidy

Repayment
\$28M
No State Match

0% Subsidy

Supplemental
\$20.83M
Cap Grant
\$2.083M State
Match (10%)

49% Subsidy

**Emerging
Contaminants**
\$2,125,000
No State Match

100% Subsidy

2023 CWSRF PPL Summary

Project Type	# Pre-Apps	Total \$
Wastewater Infrastructure	87	\$533,891,188
Sewer Extensions	6	\$67,555,000
Stormwater Infrastructure	17	\$29,625,140
Wastewater Planning	41	\$2,301,404
Stormwater Planning	28	\$1,573,500
Asset Management	6	\$210,000
Energy Audit Measures	1	\$420,000
Emerging Contaminants	1	\$290,000
<i>Totals:</i>	<i>187</i>	<i>\$635,866,232</i>

Principal Forgiveness for Affordability Factors: 10%, 20%, 25% or 35%

Limited funding, what do we do?



“If we only use \$5 for marketing, advertising and operations, we have enough to get a pizza for lunch.”

- Implement programs that:
 - Create pipeline of projects
 - Improve project development and readiness
 - Assist communities w/communication
 - Assist communities in applying for funding
 - Promote cost-effective projects
 - Promote projects that last / sustainable
 - Educate communities on proper rate setting
- Leverage funding sources

CWSRF Incentive Programs

Asset Management

100% Principal Forgiveness up to \$30,000; multiple phases available for WW, one phase available for SW

Energy Audits

Free! (Just ask!)

49 WWTFs
7 Pump Systems

Energy Audit Measure Implementation

50% Principal Forgiveness up to \$250,000
(Affordability % for costs above \$500,000)

Planning

100% Principal Forgiveness up to \$100,000



**REGISTRATION
INFORMATION COMING
SOON!**

SAVE THE DATE

Water Infrastructure Funding Workshop

Session Topics

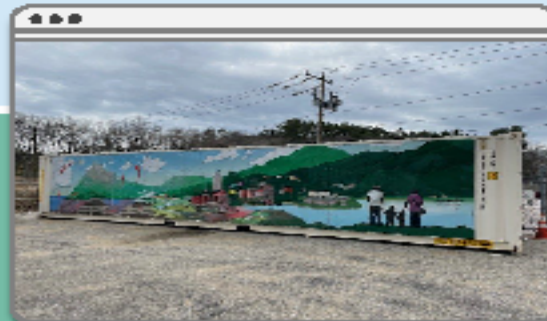
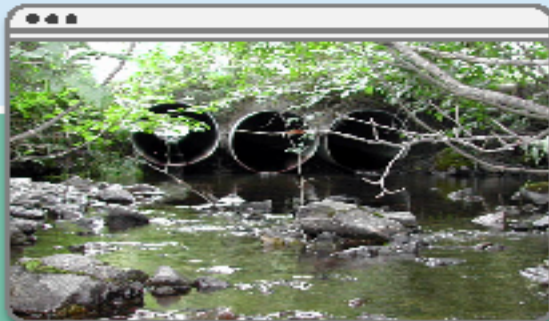
Virtual Webinar Series

April 8-12, 2024

MORE INFO

Email DWSRF@des.nh.gov

- ✓ NHDES Funding Program Updates
 - Drinking Water
 - Wastewater
 - Stormwater
- ✓ Disbursements
- ✓ Lead and Copper Rule
- ✓ PFAS
- ✓ Emerging Contaminants
- ✓ Asset Management and Sustainability
- ✓ and more!



Wastewater State Aid Grant (SAG)

RSA 486

- 20 – 30 % state grant contribution for municipalities towards principal and interest, up to 50% w/SAG Plus
- Steps for communities seeking funding
 - Follow SAG requirements from concept to completion
 - Submit pre-applications each year
 - NEW RULE UPDATE (HB2, 2023 Session): 486:7 Application for Funding. ***Final applications must be received within one year of final completion of project to be eligible for funding.***
- HB398 – 2021 Session – New Awards
 - \$5,735,248 FY ending June 30, 2023
 - \$6,919,115 FY ending June 30, 2024
 - Nonlapsing
 - Effective July 1, 2022
 - \$7.7M Remaining for NEW Awards
- SB492 – 2024 Session -
 - Delete “intercepting” throughout statute
 - Effective July 1, 2024

NH Biosolids PFAS Efforts



- 2017 Influent/Effluent Sampling at NHs WWTFs
- Since 2019 Annual Sampling Sludge Quality Certification (SQC)
- Collection System Sampling (Merrimack, Concord, Sunapee, New London, Conway & Hampton)
- Northeast Biosolids Improvement Program
- USGS Soil/ Sludge Leaching Study
- **NH Soil Remediation Standards Development (HB1547)**
 - **Due 11/23**
 - **Completed and in process to promulgate into rule in 2024 (Env-Or 600).**
- **WWEB RMS back calculating / modeling a sludge standard for the SQC program in 2024 to promulgate into rule by calendar year end.**
- **Training wastewater operators & engineers on how to establish a PFAS sampling & analysis plan for POTWs.**

CWSRF Emerging Contaminants

➤ Focus on PFAS

- \$935,000 in 2022
- \$2.125M each FY 23-26
- Loan w/100% Forgiveness

➤ Project Type

- Treatment of Landfill Leachate (Municipally Owned Landfills to Municipal WWTFs)
-

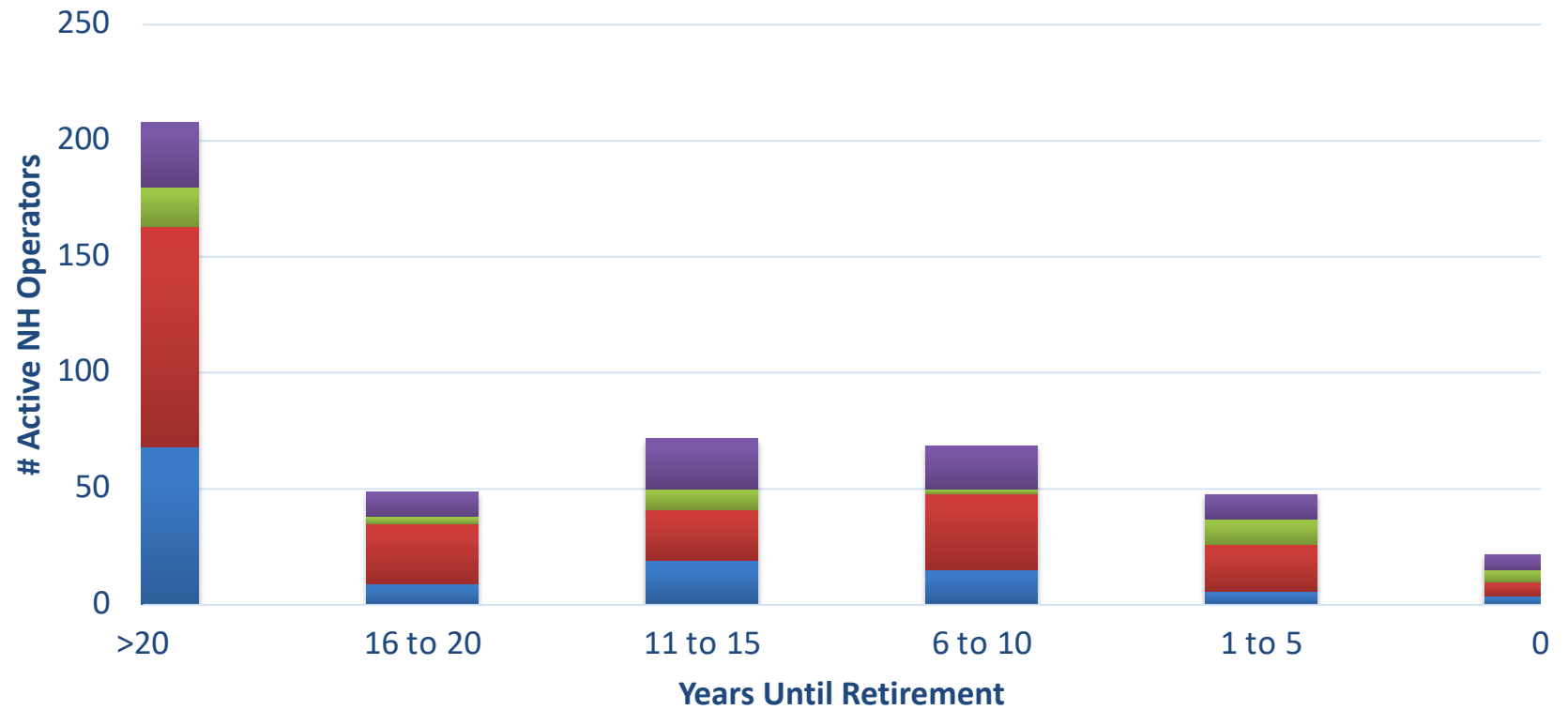


Challenges Facing the Wastewater Community

- ❑ Retirements – recruitment & retention
 - ❑ NHs Certified Wastewater Operators (~470)
- ❑ Escalating costs – electricity, inflation, fuel, transportation, chemicals
- ❑ Execution of projects
 - ❑ APRA/CWSRF funds must be spent quickly
 - ❑ Supply chain issues - long lead times on equipment
 - ❑ Consulting firms & Contractor's capacity for new work
- ❑ Uncertain regulatory environment
 - ❑ Biosolids beneficial re-use
 - ❑ Sludge Disposal for Lagoon Closures
 - ❑ PFAS monitoring and WWTF pass-thru
- ❑ Climate change & debris impacts
 - ❑ Drought / Intense rainfall
 - ❑ “disposal wipes” fouling pipes & damaging pumps



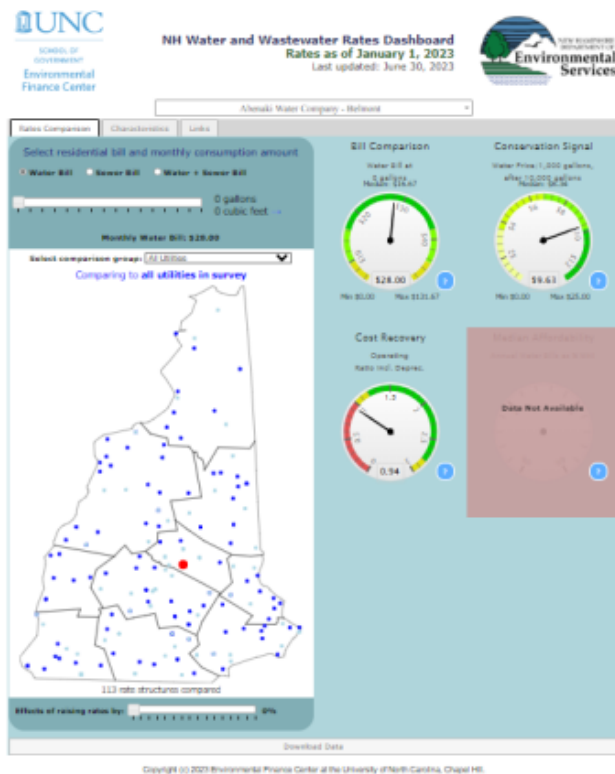
Active NH Wastewater Operators Years until Retirement by License Grade



■ Grade 1 ■ Grade 2 ■ Grade 3 ■ Grade 4

	Plant GRADE	Number of Plants	GRADE POINTS	DESIGN (MGD)	STAFFING (actual)	NEWIPCC STAFFING (calculated)	Total Operators Required (Total # Plants*Average Calculated Need)
TOTAL	1	30	21	0.139	1.44		
	2	32	40	0.728	2.17		
	3	18	64	1.308	4.27		
	4	15	87	9.919	8.82		
NEWIPCC Evaluated only	1	9	21	0.070	1.61	1.24	37
	2	15	42	0.422	2.27	2.95	94
	3	8	63	1.276	4.50	6.08	109
	4	6	88	10.307	13.00	14.47	217
			NH TOTAL OPERATORS NEEDED =				458
			NH TOTAL CERTIFIED OPERATORS =				468

2023 NH Water & Wastewater Rate Dashboard



The 2023 Water and Wastewater Rate Analysis has been finalized and the [2023 NH Water and Wastewater Rate Dashboard](#) is now live.

This year's rate analysis was contracted out to the Environmental Finance Center (EFC) at UNC- Chapel Hill.

The 2023 NH Rates Dashboard can be used as a tool during the budget season to help guide decisions about your water and wastewater rates, allowing you to compare and benchmark your rates, financial metrics, and other system performance measures with other communities across the state.



They say, "I can't afford it..."

You say...

Thank you!



Tracy L. Wood, PE
Administrator,
Wastewater Engineering Bureau
NHDES Water Division
tracy.l.wood@des.nh.gov
(603) 271-2001