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## **A** Permitting Story

stringent effluent limits!

d they ived na  $\mathbf{a}$ ev ICEQ's new model showed that discharge could not meet ambient Advanced water quality models DO standards even under the most were used to provide a more Reasonable permit limits were

accurate assessment.



identified and approved by TCEQ!

1. Once upon a time...

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### Lakeview Regional Water Reclamation Plant



1. Once upon a time...

## Lakeview WRP Outfall Location





## **Permitting history**

# 2007 and 2011

- Permit renewed and issued with three phases:
  - Interim I Phase: 5.0 мдр @ 10 вор<sub>5</sub>/4 ро
  - Interim II Phase: 5.5 мGD @ 10 вОD₅/4 DO
  - Final Phase: 7.5 MGD @ 10 BOD<sub>5</sub>/4 DO

# **2016**

 Permit renewal application was halted because no reasonable effluent limits could be identified.



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## **Typical Permitting Process**



- Texas Commission on Environmental Quality (TCEQ) responsible for issuing Texas Pollutant Discharge Elimination System (TPDES) permits.
- Dissolved Oxygen (DO) Model is used to identify effluent limits protective of DO water quality standard.

## What happens when discharging to open water?



- Large volume of ambient water available to mix with effluent
- Mixing can
  - Dilute constituents e.g.
    BOD and ammonia
  - Lessen effluent impacts on water quality



## TCEQ's Best Professional Judgment Approach



- Because of **presence** of **ambient** water
  - TCEQ developed indirect but simple method for assessing WQ impacts of Lakeview WWTP
- Calculation of dilution at edge of the mixing zone
- If effluent fraction < 5% then</p>
  - Assume no significant WQ impacts based on best professional judgment (BPJ)
  - No need to perform DO modeling
  - Renew permit



## **TCEQ Alternative Approach**



- Permit was renewed over many years using this method.
- A commercial software was used for mixing analysis.



## Software update

### 3. But one day...



In the 2016 permit cycle, a **new version** of commercial software was used

fixed bug in previous version



- calculated a dilution fraction of 39%
- > 5% threshold!
- BPJ can no longer be used
- DO modeling needs to be performed

## TCEQ Default DO Modeling Approach



3. But one day...

### 3. But one day...

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## **TCEQ** Default DO Modeling Approach



## New modeling approach is needed



Where is the ambient water?

4. Because...

- Not accounting for mixing
  with ambient water causes
  very conservative results.
- A more advanced model is needed to handle both mixing with ambient waters and DO modeling
  - Solution: Use **USEPA WASP** model!



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## What is the WASP model?



- WASP = Water Quality Analysis Simulation Program
- Developed by USEPA
- Simulates DO-Nutrient Cycle
- Can accommodate more advanced hydrodynamics
- Has been used to model many waterbodies across the nation
- More complex to set up than CSTR



### 5. Therefore...

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## WASP Modeling Approach



- Model a larger portion of Lake Lewisville
  - account for ambient effects
  - capture extent of effluent water quality impacts



### 5. Therefore...

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## WASP Modeling Approach



- Model a larger area of Lake Lewisville
  - account for ambient effects
  - capture extent of effluent water quality impacts
- Divide up model domain into ten-acre square cells
- Assign cell depths based on TWDB hydrography data



### 5. Therefore...

## WASP Modeling Approach



- Compute cell-to-cell flows
- Simulate transport of water quality constituents, e.g.
  - BOD5
  - NH3
  - DO
- Simulate **physical**, **chemical** and **biological** processes, e.g.
  - Decay of organics
  - Sediment Oxygen Demand
  - Reaeration
  - Photosynthesis
- Select model parameters based on
  - TCEQ Modeling Standard Operating Procedures (SOPs)
  - Consultation with TCEQ modelers



## **Evaluate Permit Effluent Limits**





Q = 7.5 MGD BOD<sub>5</sub> = 5-10 mg/L? NH<sub>3</sub> = 1-4 mg/L as N? DO = 4-6 mg/L?



All cells must meet DO standard for Lake Lewisville of 5 mg/L

- (0.2 mg/L tolerance allowed, so > 4.8 mg/L)
- Use model to evaluate range of effluent limits

5. Therefore...

## **Recommended Effluent Limits for 7.5 MGD (Final Phase)**

Results for 7.5 MGD @ 7 CBOD<sub>5</sub>/ 3  $NH_3$ / 4 DO DO (mg/L)  $NH_3$  (mg/L as N)  $CBOD_{5} (mg/L)$  $0.05\frac{cm}{s}$  $0.05\frac{cm}{s}$  $0.05\frac{cm}{s}$ 0.40 1.6 0.35 6.8 1.4 0.30 1.2 6.2 0.25 6.0 1.0 5.8 0.20 0.8 5.6 0.15 0.6 5.2 0.10 0.4 5.0 4.8 0.05 0.2 0.0 0.00 , DO min = 4.93 mg/L -0.2 -0.05  $CBOD_{5} max = 1.08 mg/L$ NH3 max = 0.259 mg/L as N (meets DO standard)

7.5 MGD @ 7 CBOD<sub>5</sub>/ 3 NH<sub>3</sub>/ 4 DO recommended as final phase limits.

### 6. Finally...

### **Recommended Effluent Limits for 5.5 MGD (Interim Phase)**



5.5 MGD @ 10 CBOD<sub>5</sub>/ 4 NH<sub>3</sub>/ 4 DO recommended as interim phase limits.

6. Finally...

## **Modeling Conclusions**

- TCEQ Default WQ Models can incorporate very conservative assumptions
  - May in some cases underestimate assimilative capacity of a receiving waterbody
- In the case of direct discharge into large open waterbodies
  - Advanced WQ models can be used to
    - account for both mixing with ambient waters and biological/chemical processes
    - Provide more reasonable estimates of assimilative capacity
    - But require **more effort** to set up!



- Modeling report was submitted to the TCEQ to recommend the following permit limits:
  - Interim Phase:
    - 5.5 MGD @ 10 BOD<sub>5</sub>/4 NH3/4 DO
  - Final Phase:
    - 7.5 MGD @ 7 BOD<sub>5</sub>/3 NH3/4 DO
- TCEQ approved recommended permit limits.
- Draft permit with approved limits were provided by TCEQ.
- Awaiting second draft permit and eventual issuance.



- If **permit limits** recommended by TCEQ seem **stringent**:
- Worthwhile to request TCEQ's DO model for review
- Evaluate whether
  - model assumptions are too conservative?
  - important site-specific conditions have been considered?
  - modeling methodology is appropriate for factoring sitespecific conditions?
- Then decide whether to develop revised models and recommend new limits





# **QUESTIONS?**





# **THANK YOU!**

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