

CONTACTS: Tom Hellen, Public Works Director  
788-4221 ext. 14

Heather Dawson, City Administrator  
788-4221 ext 18

## HAILEY CITY COUNCIL ADDRESSES SEWER TREATMENT PLANT DISCHARGE LIMITS

(Hailey, Idaho) – In the coming weeks and months, the city will communicate with its citizenry on the complex topic of wastewater treatment, which has been under review and the subject of study within Hailey since 2002. As a beginning, the City of Hailey sets forth the following facts to clarify the status of both the treatment plant capacity and discharge permit renewal processes in light of water quality discharge limits on the Big Wood River.

- Capacity at the treatment plant is currently at 40%. Infill development and an extended sewer service agreement to the Croy Canyon Ranch are not the primary factors that eventually will cause the city to exceed its treatment plant capacity. The central issue is stricter discharge limits likely to come from the EPA in a new discharge permit to be written for Hailey. Table 1 shows plant capacity information. The Woodside Treatment Plant has a rated capacity of 1.6 million gallons per day (MGD).
- Hailey’s Public Works Director discussed this matter with the Hailey City Council and the public on December 20, 2007. The final paragraph of a memorandum written to the city council on that date elaborates: “Because of the unknowns in both population growth rates and future regulatory requirements I would recommend that caution be exercised in any policy put forth on allowing areas outside the city to connect. I would also look to the funds made available by these connections as a means to alleviate the citizens of Hailey from bearing the full burden of necessary additions to the plant.” The council considered both aspects of this recommendation and adopted a Sewer Extension Policy in February, 2008.
- Hailey’s EPA-issued wastewater discharge permit expired in June, 2006 and the city applied for a new permit prior to that expiration. Because the EPA is backlogged with permits Hailey received an extension of its existing permit and discharge limits. The city has since received word from EPA that its permit renewal process will begin at the end of 2009.
- The stricter discharge limits are the result of a Total Daily Maximum Load (TMDL) study conducted by the Idaho Department of Environmental Quality (IDEQ), and approved by EPA in 2002. A second study (Post-TMDL), not yet approved by IDEQ or EPA, shows that a less strict discharge limit would still protect the Big Wood River. Both

Woodside Treatment Plant Capacity Information	
Area	% of Plant Capacity
Existing Connections	40
City Infill & Airport Property (at GR)	36
Croy Canyon Developments	2
<b>Total</b>	<b>78</b>
<b>Table 1</b>	



of these limits are stricter than Hailey’s current discharge permit. Table 2 shows information about Hailey’s current discharge limits along with actual discharge information, the approved TMDL limits, and prospective Post-TMDL limits. Hailey is actively seeking opportunities by which the proposed Post-TMDL limits be considered.

<b>Woodside Treatment Plant Discharge Limit Information</b>				
<b>Discharge Parameter</b>	<b>Current Permit</b>	<b>Current Actual Discharge</b>	<b>EPA Approved TMDL Limits</b>	<b>Proposed Post-TMDL Limits</b>
Total Suspended Solids	94	15	18	44
Total Phosphorus	18	3.5	5.2	8.6

**Table 2**

All numbers are in lbs/day

- In mid 2003, Hailey began its Wastewater Master Planning process by applying for a planning grant through IDEQ. When this grant was approved in 2007 the city began the study. The Wastewater Master Plan, the first draft of which is now under review by IDEQ, evaluates (among numerous other things) the effect of the increased discharge limits on the Woodside Treatment Plant.
- The timeline for completing any necessary upgrades to the treatment plant will be dependant on both EPA requirements and growth in the city. By optimizing some wastewater treatment processes Hailey believes it can meet even the stricter EPA discharge permit requirements for six years or more.
- Hailey is working with its consulting engineer to complete an implementation plan and timeline in anticipation of future plant upgrades. The plan will be subject to public comment when it is fully drafted. The city is also exploring other options, such as reclaimed water reuse to lessen its discharge to the Big Wood River, or requesting that the discharge limits be reviewed and amended by DEQ and EPA.
- The Woodside Wastewater Treatment Plant operates with remarkable efficiency, well below Hailey’s current discharge limits.

It is important to understand that proposed or potential additional connections are not the issue driving the possible need for a plant upgrade. The need for a plant upgrade is being driven by the imposition of stricter EPA discharge limits. This is not to say that capacity of the plant is unimportant or won’t have an impact on the timing of potential upgrades. Following more than 1000 additional connections in the next 5 to 15 years, depending on growth rates, the relationship of discharge limits (water quality) and plant capacity (water quantity) will be approaching tipping points. Water quality and quantity both are fundamental considerations in wastewater treatment plant planning, and are subject to careful scrutiny in the master plan.

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