

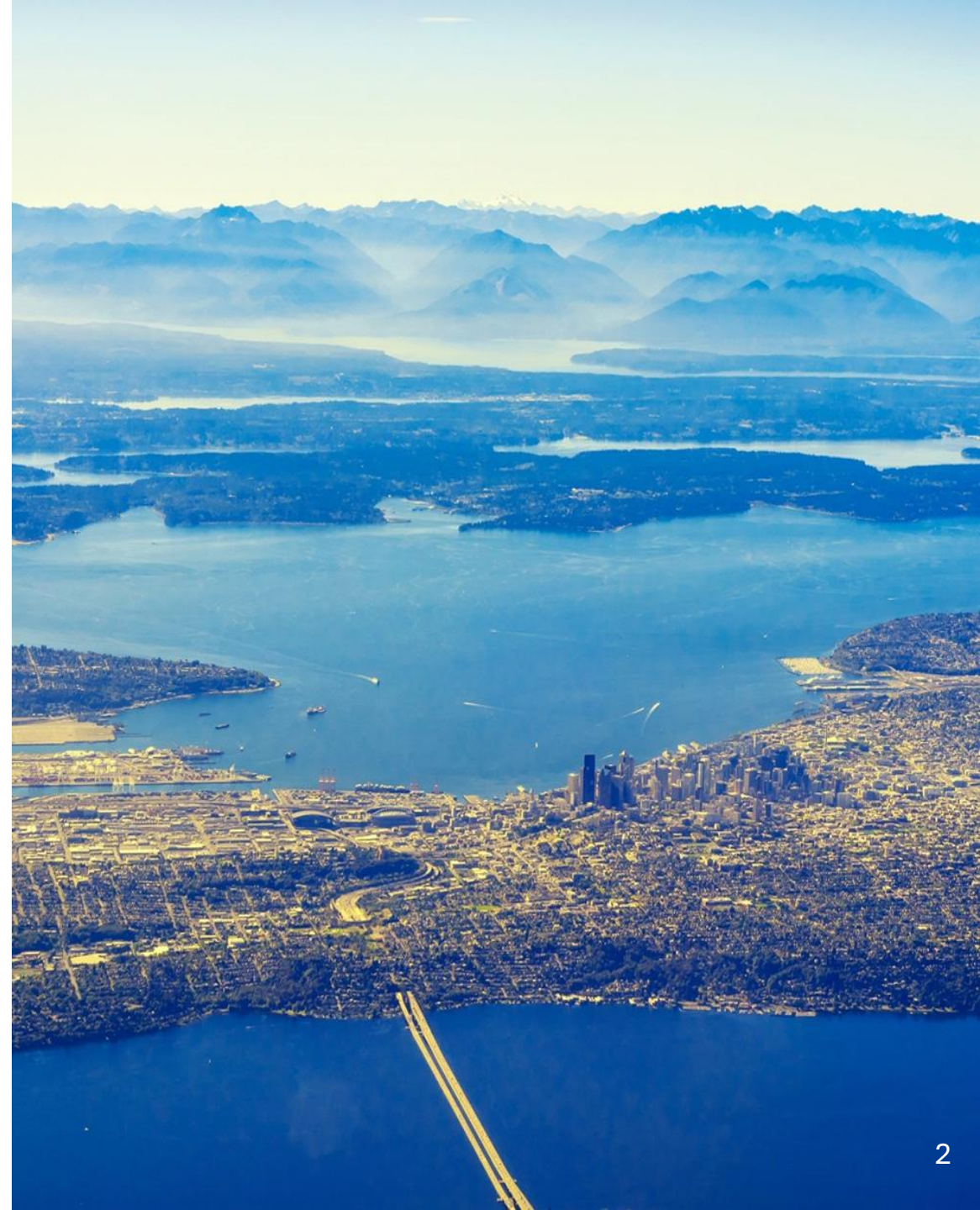
Regional Wastewater Services Plan (RWSP) Update Pollution Policy Questions & Analyses

Presented to the Regional Water Quality Committee

April 1, 2026

Purpose

- No decisions today
- Context and background for policy questions related to the **Pollution topic of the RWSP**
- Share range of policy options to answer the questions
- Gather feedback from RWQC
- Any policy options we missed that you want evaluated ?

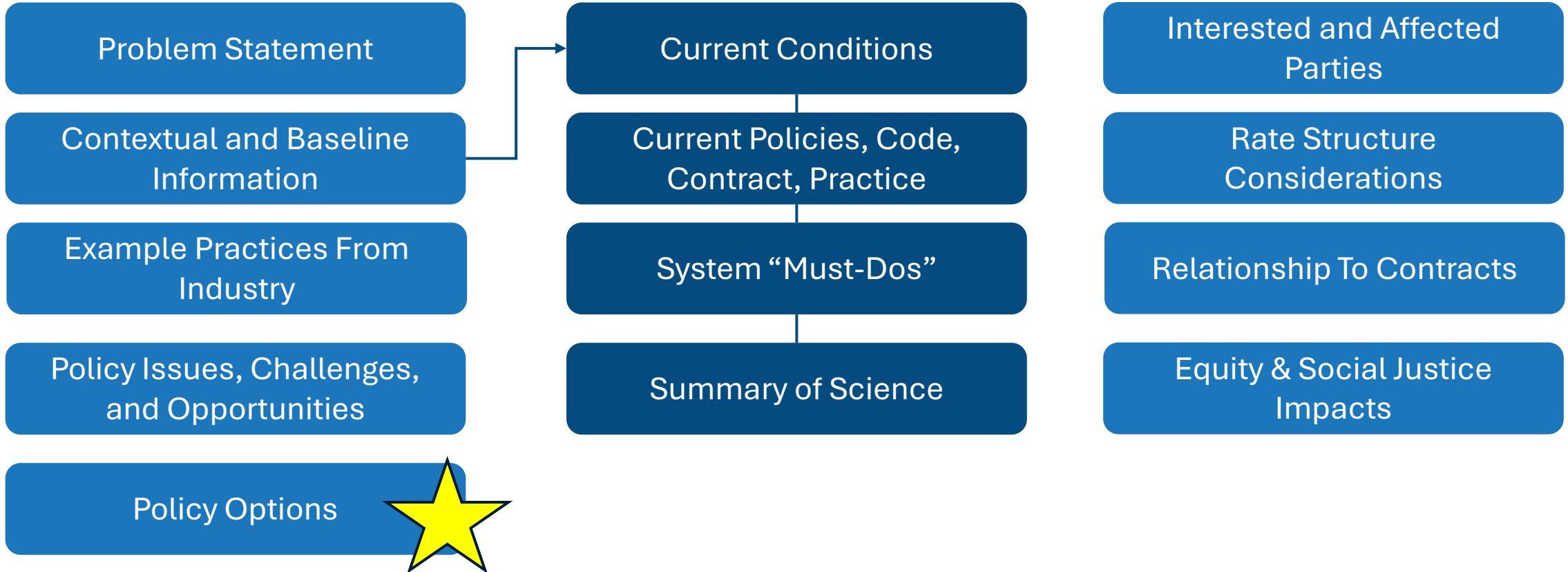


RWSP Update Schedule for Policy Analysis

Timeline (RWQC Discussion)	Policy Memo Number	Major Policy Question Number	Major Policy Questions from Scoping Document	Major Policy Question Topic
<p>Group #2</p> <p>Pollution (Source Control and Legacy)</p> <p>Step #1: April 2026 Step #2: December 2026 (<i>tentative</i>)</p> <p>Elements that relate to the Relationship to Contracts and Equity and Social Justice will be addressed as part of each policy memo.</p>	4/5	4	<p>What upstream or source control actions should the region undertake to prevent contaminants and reduce costs?</p>	Source Control (and Legacy Pollution)
		5	<p>How can WTD best support environmental benefits while instituting safeguards to protect against environmental risks of contamination? How should cost considerations be weighed?</p>	Source Control
		32	<p>How should WTD efforts support the water quality of Puget Sound and applicable inland waterways?</p>	Legacy Pollution

Policy Memo Contents

Step #1 - Today

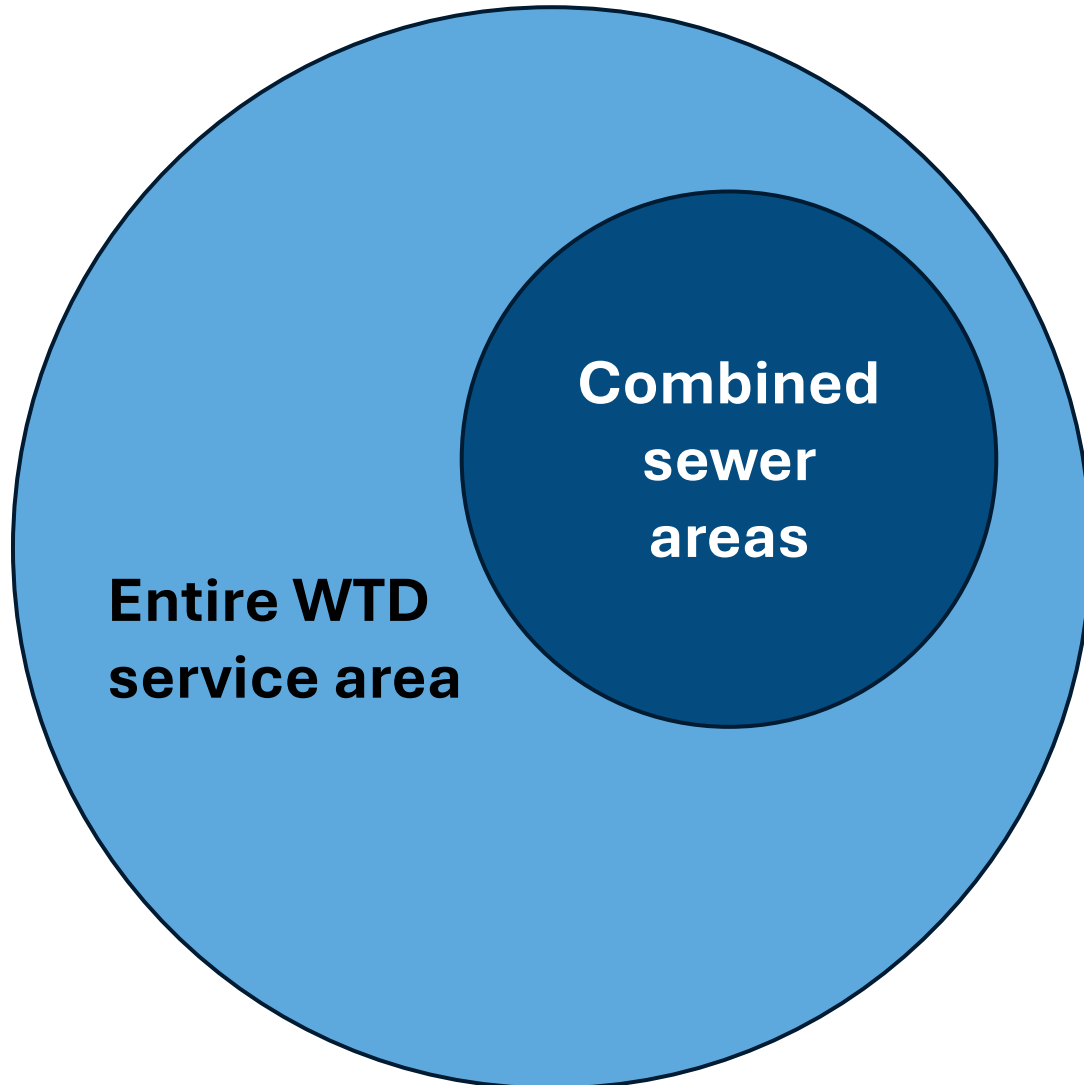


Problem Statement – Source Control

- Toxic, persistent contaminants entering the wastewater system pose a risk to humans and the environment
- End up in WTD recovery products and the environment
- High removal costs + treatment technology limitations
- County has limited authority or influence over production and use of toxic persistent contaminants



About Source Control Activities



- Many source control activities are systemwide
 - KC Industrial Waste
 - NPDES Permits
 - Operations and maintenance
 - Waterworks Grants
 - Hazardous Waste Management
 - Education and engagement
- Additional activities apply in combined sewer areas
 - Projects to reduce overflows or control CSOs
 - Stormwater pollution prevention programs
 - RainWise program

Policy issues, challenges and opportunities

- Addressing pollution in the regional wastewater system
 - Pollution comes from residential, commercial and industrial sources
 - Education can be extremely effective
- Recycled product contamination
 - Research and monitoring needed to ensure that recycled products are safe for their intended uses
- Cost considerations
 - Upfront spending on pretreatment, monitoring, and education can reduce costly end-of-pipe spending on large-scale treatment

Range of Policy Options – Source Control (Industrial Waste)

Focusing on eliminating, reducing, or mitigating harmful levels of toxic contaminants and nutrients ***before entering*** the system

Policy Option #1

Maintain current policies for Industrial Waste

Policy Option #2

Improve methods to identify more industrial users

Policy Option #3

Encourage reduction of non-regulated CECs from industrial users

Policy Options – Source Control

(Industrial Waste)

	Goal	Description	Pollution Actions
#1	Manage and reduce contaminants from industrial sources using current methods	Maintain current policies for Industrial Waste	Implement current requirements for industrial waste under King County Code (KCC), NPDES (National Pollutant Discharge Elimination System), and 40.CFR.403 (General Pretreatment Regulations for Existing and New Sources of Pollution in U.S. Code)
#2	Manage and reduce more contaminants from industrial sources	Improve methods to identify more industrial users	In addition to traditional industrial user surveying methods, use alternative or new ways of conducting surveys and identifying any potential unpermitted significant industrial users (SIUs).
#3	Lower CECs to our regional wastewater system	Encourage reduction of non-regulated CECs from industrial users	Survey industrial users for additional non-regulated CECs and suggest voluntary best management practices (BMPs).

Range of Policy Options – Source Control

(Facilities and Procurement, Upstream Sources)

Focusing on eliminating, reducing, or mitigating harmful levels of toxic contaminants and nutrients ***before entering*** the system

Policy Option #1

Maintain existing purchasing and source control policies and requirements

Policy Option #2

Apply additional resources and incentives to reduce, mitigate, and eliminate harmful levels of contaminants from existing sources

Policy Option #3

Lead and partner with others to maximize reduction, mitigation, and elimination of harmful levels of contaminants from existing sources

Policy Options - Source Control

(Facilities and Procurement, Upstream Sources)

	Goal	Description	Pollution Actions
#1	Reduce harmful levels of contaminants from existing sources	Maintain existing purchasing and source control policies and requirements	<p>Facilities and Procurement – Implement King County Sustainable Purchasing Executive Policy regarding CECs.</p> <p>Facilities and Procurement – Conduct operations and maintenance at WTD facilities to prevent unexpected releases of pollutants due to equipment failures.</p> <p>Upstream Sources – Advocate for policies that would mandate full disclosure of toxic contaminants in all consumer and non-consumer product labeling, and limit or ban toxic persistent contaminant (e.g. PFAS) use in products.</p>

Policy Options - Source Control

(Facilities and Procurement, Upstream Sources)

	Goal	Description	Pollution Actions
#2	Reduce, mitigate, and eliminate harmful levels of contaminants from existing sources	Apply additional resources and incentives to reduce, mitigate and eliminate harmful levels of contaminants from existing sources	<p>Facilities and Procurement – Inventory specialists will work across WTD facilities and King County Divisions to ensure coordination of sustainable purchasing.</p> <p>Facilities and Procurement – Proactively remove or encapsulate building materials with high PCB levels in WTD-owned facilities.</p> <p>Upstream Sources – Use incentives or buybacks for residential or business source control for products containing toxic persistent contaminants, such as replacements, buybacks of Teflon pans, etc.</p> <p>Upstream Sources – Dedicating additional resources and priority to advocacy for bans on toxic persistent contaminants (e.g., PFAS) across categories of goods: household products, industrial materials, transportation/automotive products, and building materials.</p>

Policy Options - Source Control

(Facilities and Procurement, Upstream Sources)

	Goal	Description	Pollution Actions
#3	Create and/or expand partnerships to address contaminants	Lead and partner with others to maximize the reduction, mitigation, and elimination of harmful levels of contaminants from existing sources	<p>Facilities and Procurement – Lead regional coalition of wastewater and stormwater utilities to jointly develop procurement standards to avoid products containing CECs, develop pre-qualified vendor lists, and leverage collective buying power for safer alternatives.</p> <p>Facilities and Procurement – Work with other King County departments to improve and coordinate source control across county-owned non-wastewater facilities that are known to have high levels of contaminants or nutrients, such as landfills, and PCB in building materials.</p> <p>Upstream Sources – Build and lead a regional coalition of governments, non-profits, and businesses to advocate for broad policies that would mandate full disclosure of toxic contaminants in all consumer and non-consumer product labeling, and limit or ban toxic persistent contaminant (e.g., PFAS) use in products.</p>

Range of Policy Options – Education

Increasing **individual awareness** of toxic persistent contaminants

Policy Option #1

Maintain existing programs to educate public about pollutants

Policy Option #2

Broaden engagement programs and use different tools/tactics to educate more individuals about pollutants

Policy Option #3

Lead and partner with others to maximize educational reach about pollutants

Policy Options - Education

	Goal	Description	Pollution Actions
#1	Educate individuals so they can take responsible action	Maintain existing programs to educate public about pollutants	<ul style="list-style-type: none"> Continued support of education and engagement around various pollutants/CECs, as well as continued support for WTD Education Programs WaterWorks Grants (funding education & engagement efforts); Rainwise (workshops); and Hazardous Waste (Take back meds program, curriculum, K-12 programs). Promote existing safe product certifications.
#2	Educate more individuals so they can take responsible action	Broaden engagement programs and use different tools/tactics to educate more individuals about pollutants	<ul style="list-style-type: none"> Initiate internal education campaign and external social marketing campaign to educate public about avoiding/reducing various pollutants/CECs in daily life and purchasing. Promote and/or endorse existing and/or new product rating systems and AI-based tools that help the public to avoid products containing toxic persistent contaminants.
#3	Maximize educational impact so individuals can take responsible action	Lead and Partner with others to maximize educational reach about pollutants	<ul style="list-style-type: none"> Establish WTD as a regional leader for consistent water quality and pollution prevention education through an expanded social marketing campaign effort in partnership with regional agencies, non-profits, CBO's, businesses and retailers. Develop new incentive programs where possible.

Problem Statement – Legacy Pollution

- Historic practices and discharges led to water quality impairments and sediment contamination
- Despite water quality improvements related to passage of the Clean Water Act (1972), water and sediments are still impaired in some receiving waterbodies
- Cleanups are slow and costly



Legacy Pollution Activities

- Completed cleanups:
 - Elliott Bay
 - Denny Way
 - Pier 53-55
 - Lower Duwamish Waterway
 - Duwamish Diagonal Storm Drain/CSO
 - Norfolk Storm Drain/CSO



Current and budgeted Capital expenditures

The two active and appropriated Pollution capital projects as of the Council adopted 2026/27 biennial budget:

- Sediment Management Plan (including the East Waterway Operable Unit of Harbor Island Superfund)
 - **\$88,600,000**
- Lower Duwamish Waterway Superfund
 - **\$141,500,000**

Note that these costs may be updated as capital projects are advanced and further defined.

Policy issues, challenges and opportunities

- Enhancing, expediting, or improving sediment cleanup process
 - To achieve improved water/sediment quality and reduce water body impairments faster
- Identifying funding sources
 - Parties/entities responsible
 - Grants (limited)



Range of Policy Options – Legacy Pollution

Focusing on remediating harmful levels of toxic contaminants *in or from* the system.
Includes source control activities.

Policy Option #1

Maintain current policies by implementing the Sediment Management Plan

Policy Option #2

Use lessons learned to improve processes, accelerate new sediment cleanups, and remove known and identified pollution from conveyance system

Policy Option #3

Apply new and creative approaches for faster sediment cleanups

Policy Option #1 – Legacy Pollution

	Goal	Description	Pollution Actions
#1	Meet regulatory requirements to conduct sediment cleanup and source control activities at current slow pace	Maintain current policies by implementing the Sediment Management Plan	Sediment Management – Implement current Sediment Management Plan Line Cleaning – Continue current sewer conveyance maintenance cleaning frequency that prioritizes based on O&M needs but has the benefit of removing legacy pollution deposits Source Control – Implement a pollution prevention program in the combined system to comply with the current West Point NPDES permit Nine Minimum Controls (Control #7).

Policy Option #2 – Legacy Pollution

	Goal	Description	Pollution Actions
#2	Implement process improvements to improve water/sediment quality more quickly	Use lessons learned to improve processes, accelerate new sediment cleanups, and remove known and identified pollution from conveyance system	<p>Sediment Management – Advocate to Ecology for process improvements to accelerate new sediment cleanups led by WTD</p> <p>Line Cleaning – Expand targeted structure and line cleaning in County-owned infrastructure to combat known and identified legacy pollution deposits</p> <p>Source Control – Partner with local sewer districts to conduct additional business inspections to aid in stormwater pollution prevention, enhancing source control within the combined system.</p>

Policy Option #3 – Legacy Pollution

	Goal	Description	Pollution Actions
#3	Faster improvements to water/sediment quality through alternative approaches	Apply new and creative approaches for sediment cleanups	<p>Sediment Management – Implement and lead multi-party sediment cleanups without other Potentially Responsible Parties (PRPs) and pursue cost recovery after completing cleanup actions</p> <p>Sediment Management – Apply Enhanced Natural Recovery cleanup to all WTD CSO associated contaminated sediment areas and promote development of bioremediation of bio-accumulative organics to treat those areas in the future</p> <p>Line Cleaning – Partner with local sewer agencies to remove all legacy pollution deposits in sewer conveyance systems by surveying entire system and cleaning all needed structures and pipes of accumulated sediment (including both County-owned and locally-owned infrastructure)</p>

Q & A



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