

Working Document – May 24, 2021

WATER ENVIRONMENT FEDERATION

FY21/22 POSITION STATEMENTS WORK PLAN

TIER 1 Priority Position Statements:

1. *WEF Biosolids Management Position Statement Update – Short Summary of Need*

WEF does not currently have a biosolids management position statement, however managing biosolids at WRRFs is an essential part of their operations. WEF has been active in the biosolids management space including the development of a Roadmap and other materials as well as leadership through the National Biosolids Partnership. Some of its actions in recent years also recognize increasing opportunities and benefits associated with shifting the paradigm from “wastewater treatment” to “resource recovery” with biosolids at the center of that approach.

The WEF biosolids management position statement would establish and clarify the value of the beneficial reuse of biosolids and its place in environmental protection. The position statement would be consistent with the PFAS and CEC position statement and would reiterate that WRRFs and biosolids reuse programs are receivers and not generators or users of PFAS, and therefore should not be penalized by legislation or regulation. In addition, the position statement would affirm that biosolids continue to be regulated under the Clean Water Act in the United States or similar regulations in other countries. Finally, the biosolids management position statement would affirm the need for the development of approved and certified analytical methods for the analysis of CECs in biosolids that provides for consistent and equitable evaluation.

Lead Facilitator¹: Jackie Jarrell

Lead WEF Staff (Drafter): Dr. Patrick Dube

Deadlines: **Approved by the BOT – September 24, 2020**

2. *WEF Water Infrastructure Funding Position Statement – Short Summary of Need*

The U.S. EPA estimates that America’s water and wastewater infrastructure requires nearly \$750 billion worth of investment over the next 20 years just to maintain current levels of service, and independent estimates place this figure over \$1 trillion. Local ratepayers will shoulder much of this burden, but all levels of government must be part of the solution, especially considering growing challenges with affordability and climate

¹ Lead Facilitator – is the designated facilitator who will use the Charge to tease out the content that will be contained in the draft Position Statement; The Lead WEF Staff (Drafter) is the designated WEF staff in charge of drafting the Position Statement

changes.

An updated Water Infrastructure Funding Position Statement should look closely at how to continue to support current successful funding mechanisms, as well as truly innovative funding mechanisms that match a certain set of criteria, which are:

- will provide substantial funding,
- will take equitable funding into consideration,
- will consider affordability,
- will not potentially take funding from existing funding streams,
- ideas that have not already been explored by others in detail,
- aren't polarizing in Congress and amongst stakeholders in the water sector. (We hope to eventually build a coalition of support around the concepts),
- innovative funding mechanisms that are new ideas or are mechanisms that have been successful in other sectors,
- the approaches we identify don't necessarily need to be federally-backed funding mechanisms, but they should serve as a funding tool for the entire wastewater and stormwater infrastructure system.

Lead Facilitator: Allison Torbitt, GAC Legislative Subcommittee Chair

Lead WEF Staff (Drafter): Steve Dye, WEF GA Staff

Deadlines: **Approved** – February 11, 2021

3. WEF Lead and Copper Position Statement – Placeholder

EPA is expected to publish the final Lead and Copper Rule in the Federal Register, Thursday, October 29 during the National Lead Poisoning Prevention Week (Oct 26-30; Thursday is about Drinking Water – they published the proposed rule the same day last year). We will know more when we see the final rule on how to position WEF on this issue. The proposed rule contained language that seemed to push water treatment facilities to use chemicals harmful to wastewater infrastructure. WEF should look at the final rule and evaluate what this Position Statement should look like.

Lead Facilitator: Shellie Chard, WEF BOT

Lead WEF Staff (Drafter): Claudio Ternieden

Deadlines: **Dependent on Publication FR by EPA;** Charge to be Approved: ASAP (via email); Draft PS/Final PS: ASAP; BOT: Jan/Feb 2021

NOTE: **Approved** - February 11, 2021

4. WEF Climate Change Position Statement Update – Short Summary of Need

Increasingly, WEF is being called upon to use its leadership position to advance sustainability goals and practices (see WEF Position Statement on SDGs), extreme events, resilience, resource recovery, emissions and others, as they related to climate change, particularly in the water sector. As a global organization, WEF's members are increasingly aware of the impacts of climate change in their operations and some are asking board members to incorporate a more refined understanding of climate change and its impact into WEF's external advocacy. This position statement will also include language regarding the impact of climate change to utilities, mitigation activities utilities are taking or could take to address these impacts. In addition, wet weather and dry weather issues could be incorporated given their interdependence with climate change issues and must be in alignment with other position statements regarding wet and dry weather.

Lead Facilitator: Paul Freedman, WEF Past President (represents WEF in federal Climate Change activities)

Lead WEF Staff (Drafter): Claudio Ternieden, WEF GA Staff

Deadlines: **Approved** – April 15, 2021

5. WEF's Diversity, Equality and Inclusion Position Statement – Short Summary of Need

WEF recognizes that recruiting and training new water sector workers is a challenge for water utilities and companies, but it also provides an opportunity to create a water workforce that is more diverse and more reflective of the communities they serve. As a leading professional organization for the water sector, WEF understands that our programs and practices and those of our MAs must also promote greater diversity and serve as a model for the sector we serve.

The WEF [Strategic Plan](#), adopted in 2011 and last revised in 2018, articulates the Federation's Mission, Vision, Core Values, Critical Objectives, and Strategic Goals. In 2019, the WEF Board of Trustees created a Workforce Diversity and Inclusion Task Force that focused on the promotion of diversity and inclusion in the water sector. The work of this task force is aligned with the following strategic goals:

- **1a.** Increase diversity and inclusiveness in the water sector through engagement and membership growth
- **4d.** Promote sector-wide action toward development of a water workforce that is diverse and prepared to meet the future needs of the water sector.
- **5a.** Invest in WEF's personnel and business assets to ensure that they can continue to support the achievements of WEF's mission and objectives.

WEF is committed to meaningful progress towards Strategic Goals 1a and 4d, and to leading the change towards a more diverse, equitable, and inclusive WEF and water workforce. This requires a cultural change and a more intense long-term focus. WEF's Workforce Position Statement would help lead this effort.

Lead Facilitator: Ifetayo Venner, Vice-president Elect, WEF BOT

Lead WEF Staff (Drafter): Laura Childs/Bri Nakamura, WEF Staff

Deadlines: TBD

NOTE: This is a new area; BOT Task Force can help inform. Also, WEF has consultant in place starting their work with the BOT.

6. WEF Workforce Position Statement – Short Summary of Need

The water sector faces many challenges in the future and having a workforce that is capable and stable will ensure that the nation and the world is prepared to face these challenges. There is a need for water sector to address a wide variety of workforce development issues, from having enough people entering the water sector workforce, to knowledge development and skills transfer, to diversity and inclusion within all segment of the water sector. There are solutions to many of these workforce development issues, but they will require a concerted and coordinated effort by the Water Environment Federation, its Member Associations, its members and partners, and other stakeholders internal and external to the water sector. WEF can and should play a central role in advancing these solutions.

Lead Facilitator: Staff Recommendation: Andy Kricum or Jackie Jarrell

Lead WEF Staff (Drafter): WEF GA Staff, Adriana Caldarelli

Deadlines: TBD

7. Wastewater-Based Epidemiology (WBE) Position Statement – Short Summary of Need

As infectious disease outbreaks continue to occur across the world, the need to establish prediction and prevention systems becomes greater. Organizations like the World Health Organization, the National Institutes of Health and the United States Agency of International Development affirm the need for prediction systems for infectious diseases. Community wastewater represents a snapshot of the status of public health within communities served by wastewater systems. Through the monitoring of wastewater, substances such as Opiates, Cocaine and infectious diseases such as SARS-CoV-2 can be tracked and investigated to support a prediction and prevention system for such substances as well as ultimately support the development of public health policy.

Wastewater-based epidemiology is a developing opportunity for the water sector but a roadmap for participation and engagement for wastewater utilities is needed. This position statement likely identify wastewater-based epidemiology as a new and important opportunity for the water sector and outline the need(s) for effective engagement by the water sector (e.g., a roadmap for utilities; wastewater-based epidemiology methods; engagement opportunities for the water sector and public health policy development).

Considerations for discussion for such a Position Statement:

1. What should be in a WBE Position Statement?

2. Should it be related to what a utility must consider before engaging in WBE?
3. If so, wouldn't that be best achieved through a primer or guidance?
4. If a Position Statement – what position should that position statement contain?

Lead Facilitator: Aimee Killeen, WEF BOT

Lead WEF Staff (Drafter): WEF GA Staff - Claudio Ternieden

Deadlines: **TBD** - this is a new area; information is needed; WEF is engaged on this issue; timing tracks with CDC's timeframe. WEF will engage the WEF CMO Public Health Advisory Group.

8. WEF Resource Recovery Position Statement – Short Summary of Need

WEF does not currently have a position statement about resource recovery, yet some of its actions in recent years recognize increasing opportunities and benefits associated with shifting the paradigm from “wastewater treatment” to “resource recovery”. Such recognition includes its committee name change to “Municipal Resource Recovery Design Committee” from “Municipal Wastewater Treatment Design Committee” to align with its Critical Objectives & Strategic Goals (4a. Drive an increase in resource recovery in the water sector). Depending on the scope the MRRD Committee will lead with the back up of the Residuals and Biosolids Committee

We envision that this position statement would be an “umbrella” statement covering several technical topics that could each have their own position statement, similar to the recent position statements on Contaminants of Emerging Concern (umbrella) and PFAS (subtopic). Potential follow on Position Statements to the Resource Recovery Position Statement could be follow on Position Statements (also to be prioritized) such as:

- A. Nutrients (see below short summary of need)
- B. Energy
- C. Biosolids – Fast Tracked to Tier 1 – Approved by the BOT 9/24/20**
- D. Bioplastics and other biomaterials
- E. Water Reuse - a new Position Statement was adopted by the BOT in September 2017**

A. WEF Nutrients Position Statement – Short Summary of Need

WEF does not currently have a position statement about nutrient removal or nutrient recovery. Many member utilities continue to feel increasing pressure to improve the control and management of nutrients released to the environment from their WRRFs. This area has seen significant technology advances in recent years, and WEF has recognized its importance by publishing many technical guidance documents such as The Nutrient Roadmap (2015) and by hosting specialty conferences and symposiums.

Sustainable solutions in many cases will likely require a more holistic, watershed-based approach than just WRRF effluent limits. Much of the recent regulatory pressure is fueled by the year-over-year increasing occurrence of harmful algal blooms in nutrient-enriched

waterbodies used for public recreation and/or drinking water supplies.

Many of these watersheds receive runoff from agricultural fields, animal feedlots, or other nutrient sources that can be much more significant contributors than WRRFs. WEF members may need to collaborate with stakeholders from other industry sectors and engage in water policy discussions outside of traditional Clean Water Act and NPDES programs. Therefore, WEF advocacy on this issue may need to extend to legislation and regulations such as the Farm Bill and water quality trading programs that include both non-point and point sources.

Lead Facilitator: Staff Recommendation: Art Umble, Stantec
Lead WEF Staff (Drafter): Claudio Ternieden, WEF GA Staff (with support from Amy Kathman)
Deadlines: Charge to be Approved/Scope Definition: SAC February Meeting; Draft PS: SAC March Meeting; Final PS: April SAC Meeting

9. WEF Chloride and Salty Parameters

WEF volunteers have brought to WEF staff's attention the need for a position statement on Chloride and Salty Parameters (or similarly named position statement) for the following reasons:

- Chloride and other "salty" parameters are being regulated based upon [aquatic life toxicity](#);
- Even with significant investment, water resource recovery facilities (WRRFs) will not have the ability to remove these parameters without creating a brine stream that cannot be discharged in non-coastal areas;
- Additional regulatory and/or funding mechanisms will be needed to address this increasingly recognized challenge;
- WEF staff is in dialogue with EPA on the status of implementation of the aquatic criteria.

Lead Facilitator: Not yet identified
Lead WEF Staff (Drafter): WEF GA Staff: Patrick Dube/Claudio Ternieden
Deadlines: TBD – a discussion of whether to pursue it or not.

Tier 2 Priority Position Statements:

10. WEF Utility/Water Services Regionalization Position Statement– Short Summary of Need

Other organizations currently have positions on this issue. It is an important regulatory and policy issue also connected to the affordability issue, as well as old grants programs and local political issues. Having a clear position statement on this issue identifying the criteria and elements of utility/water services regionalization that WEF membership support would be very helpful to how WEF MAs engage with EPA regional

and headquarters offices. Because of the local and state issues associated with this issue, a broad group of experts from WEF's membership should be engaged in this process.

Lead Facilitator: Staff Recommendation: Shellie Chard, WEF GAC
Regulatory Subcommittee Chair (WEF BOT candidate)
Lead WEF Staff (Drafter): WEF GA Staff: Steve Dye
Deadlines: Charge Approved/Scope Definition: TBD; Draft PS: TBD;
Final PS: TBD

11. WEF Peak Wet Weather Policy Position Statement – Short Summary of Need

Despite not having a position statement, WEF staff and volunteer members actively engage in public forums on the issue of wet weather flow management. As EPA continues to develop and evolve its policies regarding peak flow discharges from separate sanitary sewers, it is important for WEF to continue to educate and advocate on this issue. Recent examples of WEF's leadership in this area include:

- 2018 – GAC forms Peak Flow Task Force for activities related to EPA Peak Flows Management rulemaking. Active participant at Roundtable and Listening Sessions. Submitted written comments to rulemaking docket. **Rulemaking currently shelved by EPA.**
- 2016 – MRRDC forms Wet Weather Treatment Workgroup for technical activities related to this issue.
- 2014 – Publishes "Wet Weather Design and Operation in Water Resource Recovery Facilities". The municipal WRRF sector's first design and operations guidance aimed specifically at peak wet weather flows.
- 2013 – Publishes "Guide for Municipal Wet Weather Strategies".

Future WEF activities in this area would benefit from a statement that concisely summarizes its current position on this issue. We envision that this would draw largely from WEF's comments submitted to the rulemaking docket in 2018. Furthermore, the Water Infrastructure Improvement Act (WIIA) requires EPA to provide a report to Congress on integrated planning related to peak wet weather. Such reports often provide policy or regulatory guidance and, because of the nearing due date of the report, WEF needs to take this opportunity to continue to be involved in the crafting of such guidance.

NOTE: WEF is in dialogue with EPA on the status of this rulemaking. Because of the substantial work done by WEF Technical Committees in collaboration with the GA Committee – this Position Statement could be developed expeditiously once scope is identified and agreed upon. No timeframe and deadlines set for this Position Statement at this time.

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