



# Industrial Reuse Water Permitting in Washington

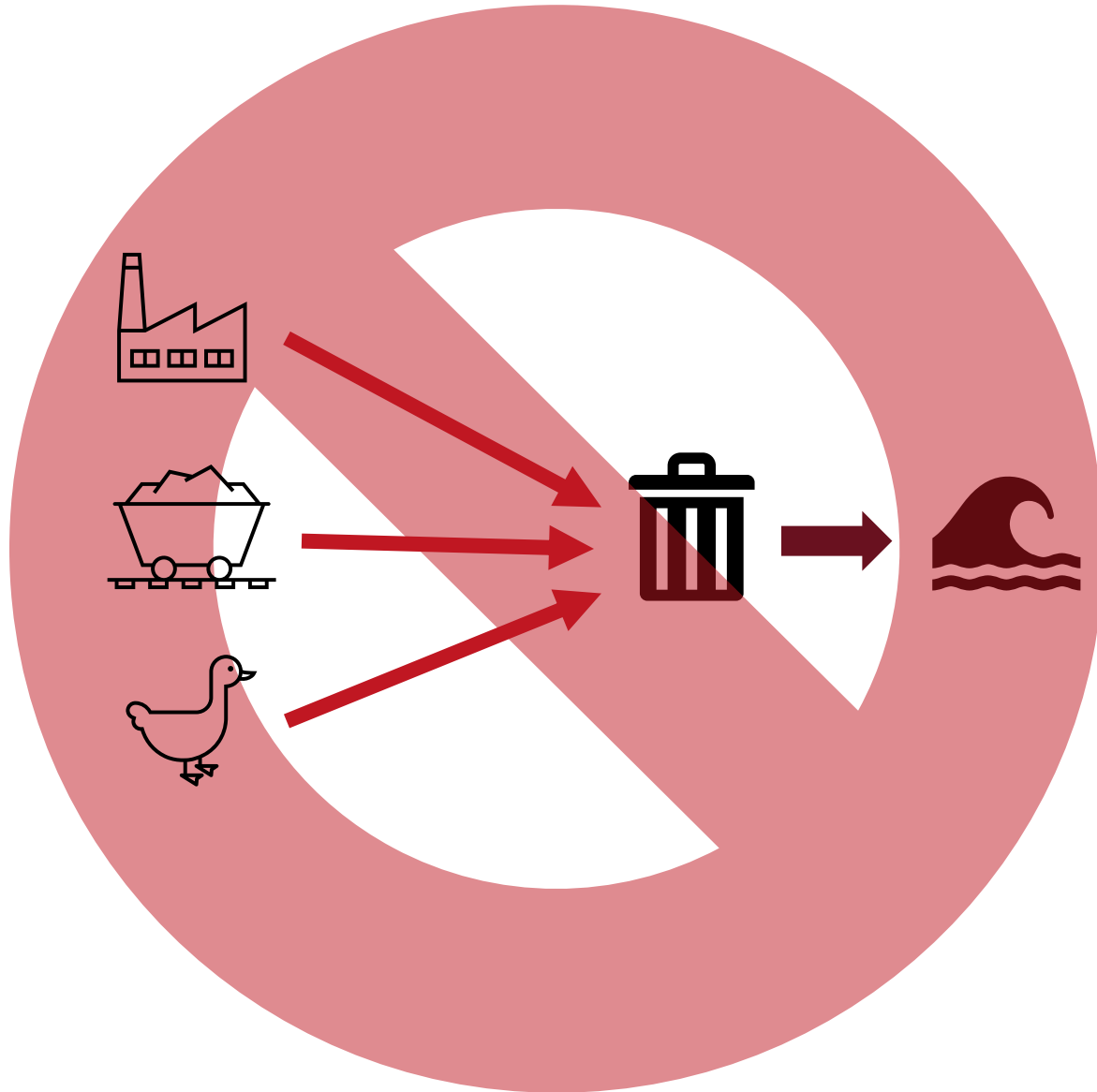
KATIE SALTANOVITZ, PE  
WATER LAW IN EASTERN WASHINGTON  
MAY 22, 2025

# // Wastewater Permitting Authority



DEPARTMENT OF  
**ECOLOGY**  
State of Washington

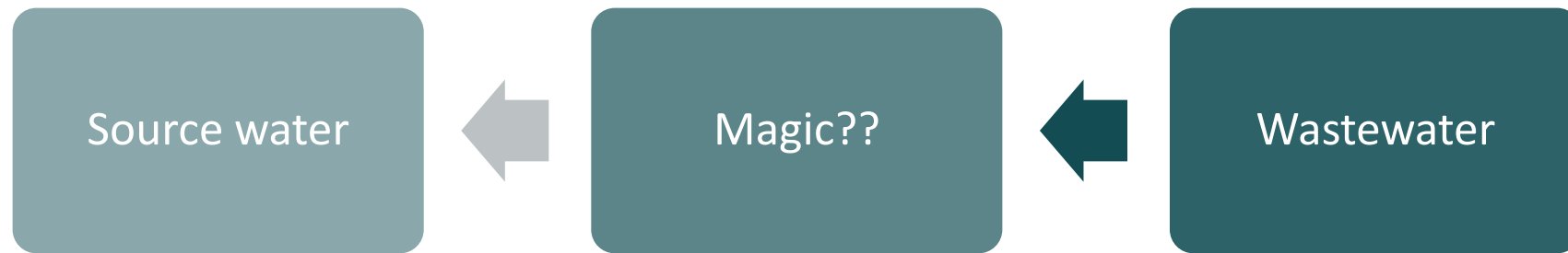
# // State Waste Discharge Permit Program



# // What is wastewater?



# // What is wastewater?





# // Reclaimed Water



<https://publichealthinsider.com/2017/08/04/the-poop-loop-scoop-how-king-county-recycles-waste-and-water/>

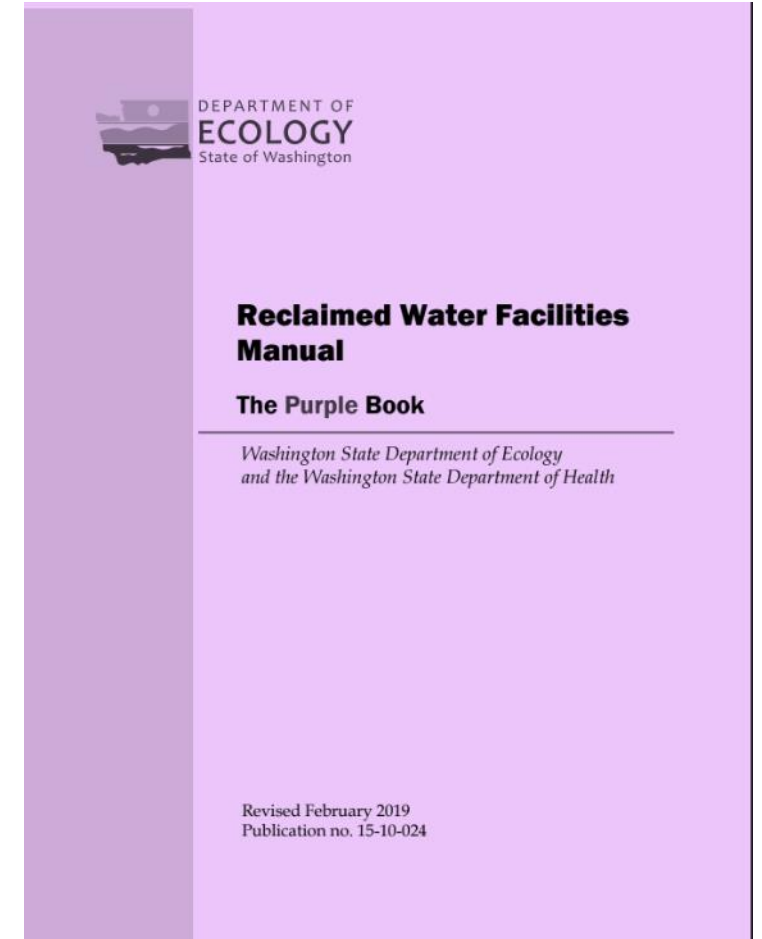
# // Statutes, Rules, and Guidance

Type	Statute	Rule
Reclaimed water Class A+, A, B	RCW 90.46	WAC 173-219
Reuse water Agricultural Industrial Process Water Industrial Reuse Water	RCW 90.46.150 and 90.46.160	None

# // No Rules

## QUESTIONS

- ▲ Is what I want to do with my wastewater classified as ‘industrial reuse’ or ‘agricultural industrial reuse’?
- ▲ Which water quality standards does it need to meet?
- ▲ Is a permit required from Ecology? Which one(s)?
- ▲ Is a permit required from any other agency? Which one(s)?







# Case Study



# // Case Study- In Progress

## BACKGROUND

- ▲ Food processing facilities in Central WA
- ▲ Current discharge: to City Industrial WWTP; then to Federal canal system (operated by local irrigation district).
- ▲ Federal agency notified City that discharge permit to canal will be terminated.



# // Case Study- In Progress

Ecology

USBR

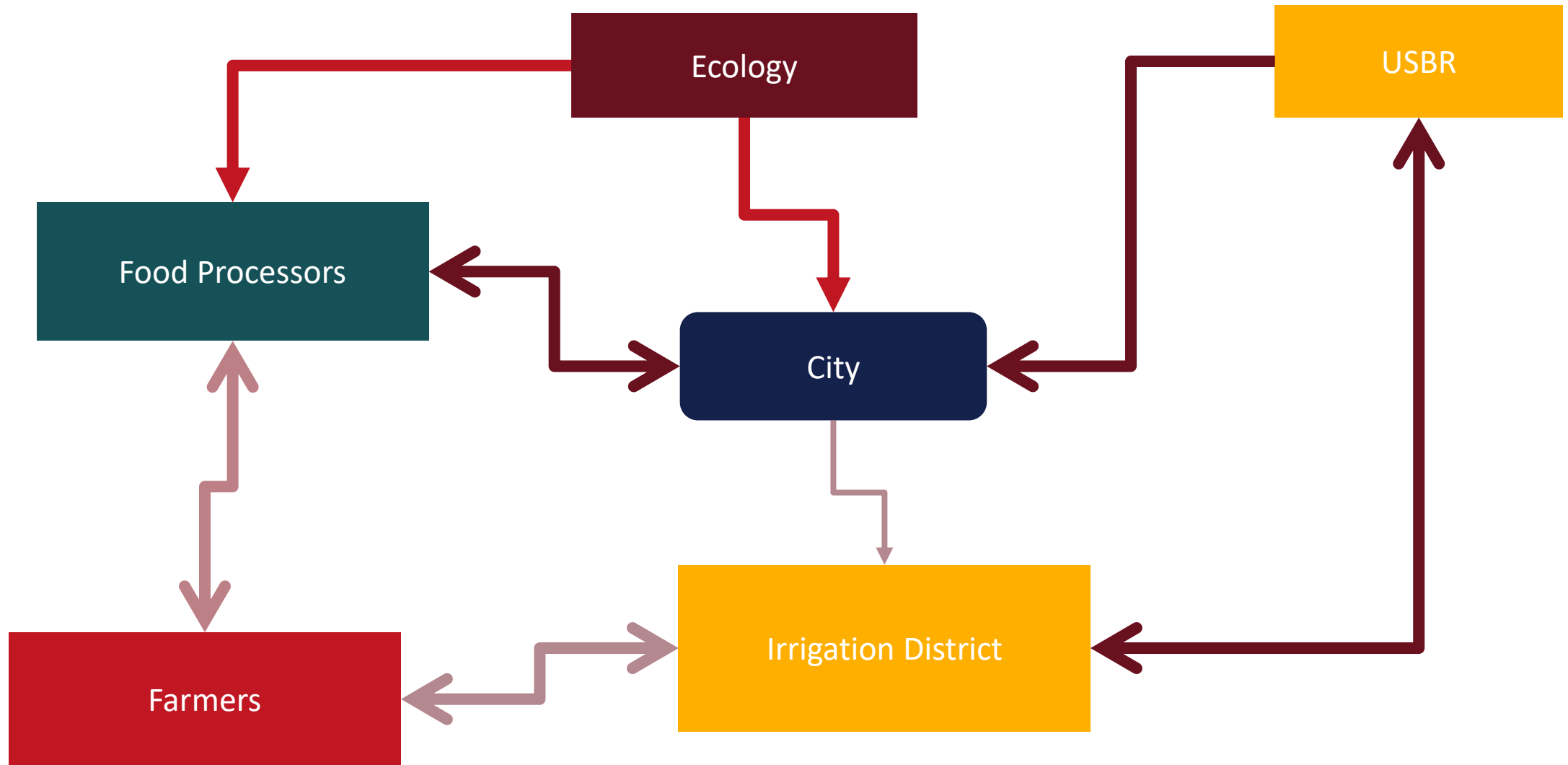
Food Processors

City

Farmers

Irrigation District

## // Case Study- In Progress



# // Case Study - In Progress

## PROPOSED APPROACH(ES)

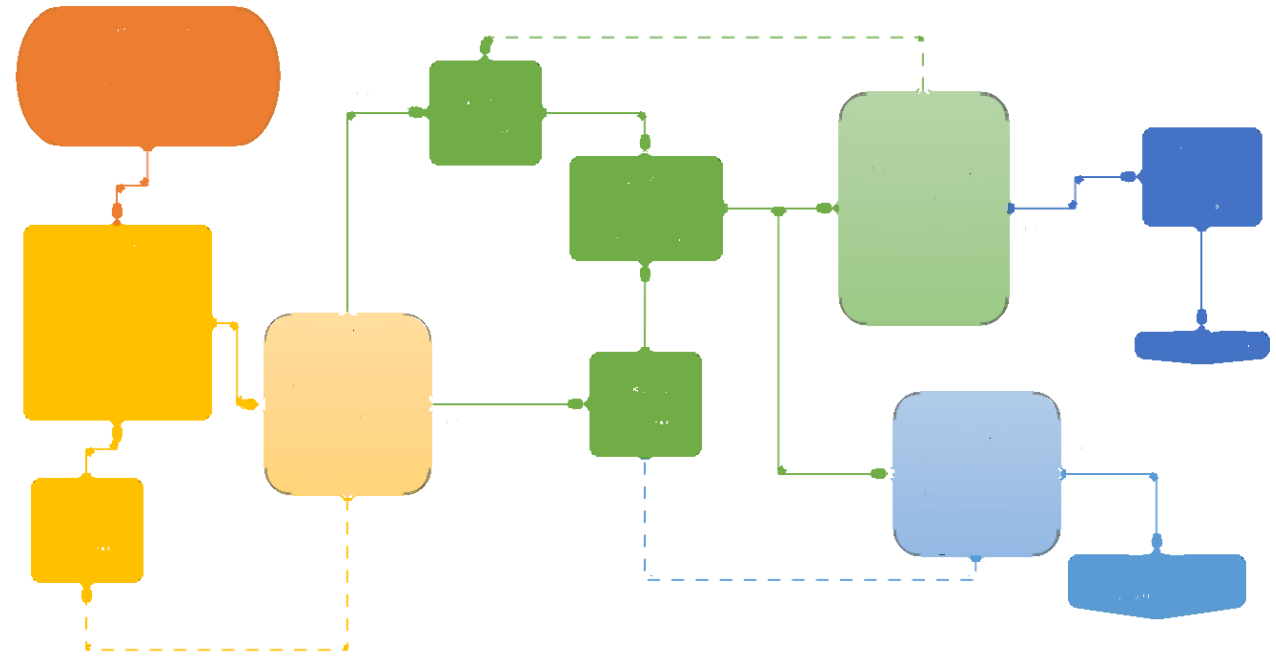
- ▲ Apply treated wastewater to land (not Reuse)
- ▲ Further treat wastewater and send to farmers for irrigation
- ▲ Further treat wastewater and discharge to canal
- ▲ Further treat wastewater in City reuse treatment system for distribution/ recharge/ storage



# // Case Study - In Progress

## WQ PERMIT MILESTONES

- ▲ Feasibility Study approval
- ▲ Engineering Design Report approval
- ▲ Determination of permit mechanism
  - Separate or combined with NPDES?
  - Separate or linked permits for WW Generator and WWTP?
- ▲ Reuse Permit issuance





# // Case Study - In Progress

## DESIGN MILESTONES

### ▲ Water balance

- WW Generation- how much and when?
- Demand for reuse water- how much and when?
- Equalization needs

### ▲ Water Quality Requirements

- Existing WW quality
- Receiving water quality
- Permit parameters- negotiated with Ecology (AKART)

### ▲ Treatment design

- System sizing (volume/ flow)
- Treatment technology(-ies)

### ▲ Infrastructure design

- Treatment facility structures
- Conveyance (pumps and pipes)
- Storage

# // Case Study - In Progress

## STAKEHOLDER MILESTONES

- ▲ End user(s)
  - Risks of receiving 'reuse' water
  - Contractual relationship with other Agencies
  - Who gets to make the final call on acceptable risk?
- ▲ Treatment facility/ Municipality
  - Division of permit responsibility with reuse water generator
  - Financial support
  - Ownership of infrastructure

# // Case Study - In Progress

## PROJECT MILESTONES

- ▲ Project funding/ Capital cost estimate
- ▲ Establishing a legal entity to be the project 'Owner'
- ▲ Design/ Construction contracting mechanism- DB or DBB?
- ▲ Division of financial contribution among stakeholders
- ▲ Identification of/ agreements with users of water;
- ▲ Identification of/ agreements with landowner(s) of infrastructure and distribution network

# What is next??