COG Region Wastewater Position in regard to the Chesapeake Bay TMDL

Wastewater treatment plants, (known as water resources recovery facilities or WRRFs) in the COG region account for about one-quarter of total wastewater in the entire Bay watershed.

The wastewater sector overall and particularly in the COG region has accounted for the majority of nutrient reduction achieved to date under the Bay TMDL.

The region's WRRFs have all met and exceeded Bay TMDL targets for the reduction of nitrogen, which represents the biggest remaining challenge to achieving the Bay TMDL goals by the voluntary 2025 deadline.

Achievement of these TMDL goals in Maryland and Virginia under their Phase 3 watershed implementation plans depends on the continued exceedance by WRRFs of the reductions needed to achieve their official allocations under the Bay TMDL and currently compensates for less-than-planned nutrient reductions by the agricultural and urban stormwater source sectors.

The WRRFs are willing to continue to achieve this better-than required nutrient reduction performance on a voluntary basis, in response to cost share funds and other incentives. However, Bay Program officials at the state and federal levels need to recognize that this excess capacity for nutrient reduction performance, particularly for nitrogen, can be used only temporarily to offset lack of progress in other sectors. Eventually it will be needed to accommodate increased sewage flows as the region's population and jobs continue to grow.

Thus, a core tenet of COG's Chesapeake Bay policy, which has been stated at many of the previous Bay forums, is that the region's wastewater utilities need to preserve their ability to accommodate population and job growth in the region, which may lead to future increases in their discharge of nitrogen and phosphorus while still maintaining their allocated caps on loads.

For more technical details, see this analysis paper presented to COG's Water Resources Technical Committee: https://www.mwcog.org/events/2021/?F_committee=205