
Maintaining Compliance with your **WPDES Permit Requirements** (Keeping Your Ducks in a Row)



6-2007

WPDES Permit Requirements

- Nutrient Management
- Runoff Control
- Proper design and construction of facilities/systems
- Proper storage of materials
- Monitoring and Reporting



Nutrient Management

- It's all about the plan!

- **The plan needs to reflect all the requirements of NR 243 and any specific conditions contained in your permit**



Nutrient Management Common Shortcomings

- Poor or lacking narratives
- Incomplete or outdated conservation plans



Nutrient Management Compliance Issues

- Application on unapproved fields
- Application of liquid manure on frozen or snow covered ground
- Failure to follow setbacks or incorporation requirements in hazard areas



Nutrient Management

Who is Responsible?

- In most situations, permittee is responsible for manure - “cradle to grave”
- Custom applicators can be held responsible in instances of negligent application - a case-by-case determination



Runoff Control

- “No Discharge”

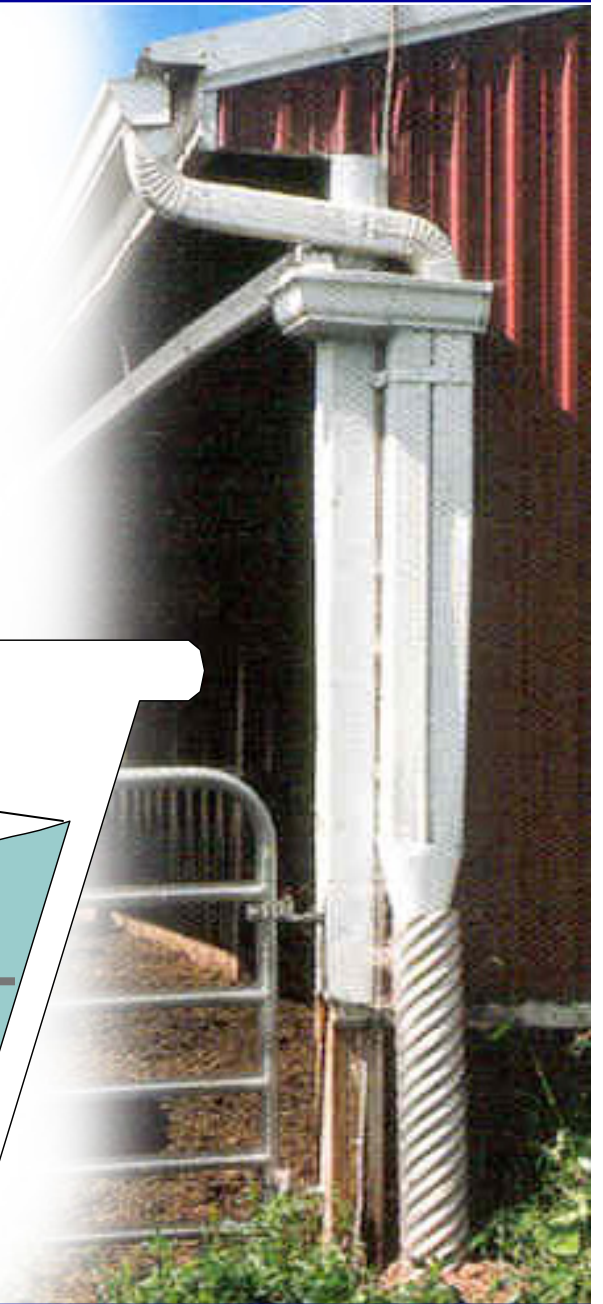
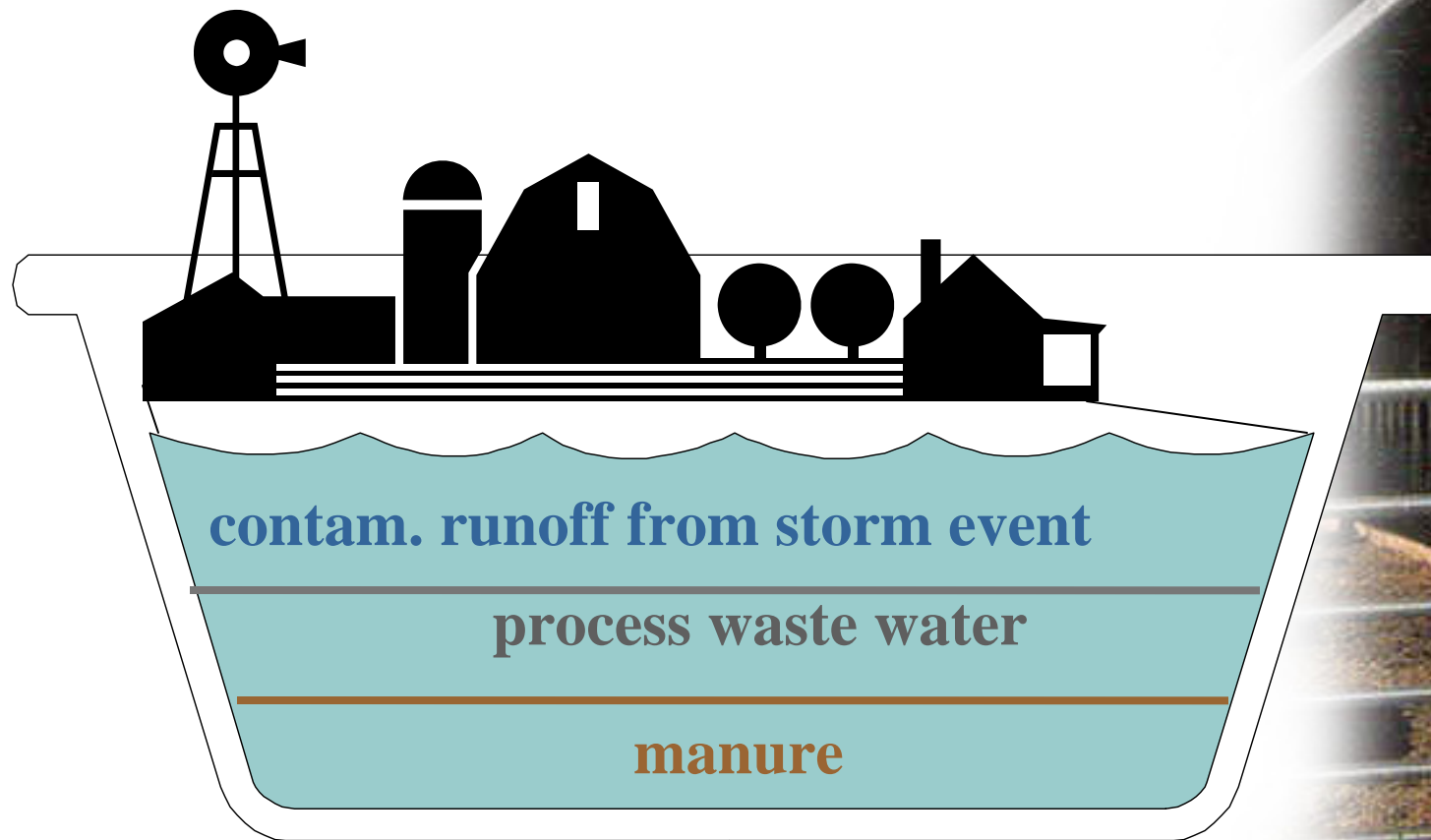
There can be no discharge of pollutants from a structure in the animal production area to navigable waters, except in the instance of a 25-yr., 24-hour for most operations*

*New source swine, veal or poultry may not discharge to navigable waters under any storm event



Runoff Control

- “No Discharge”



Runoff Control Compliance Issues

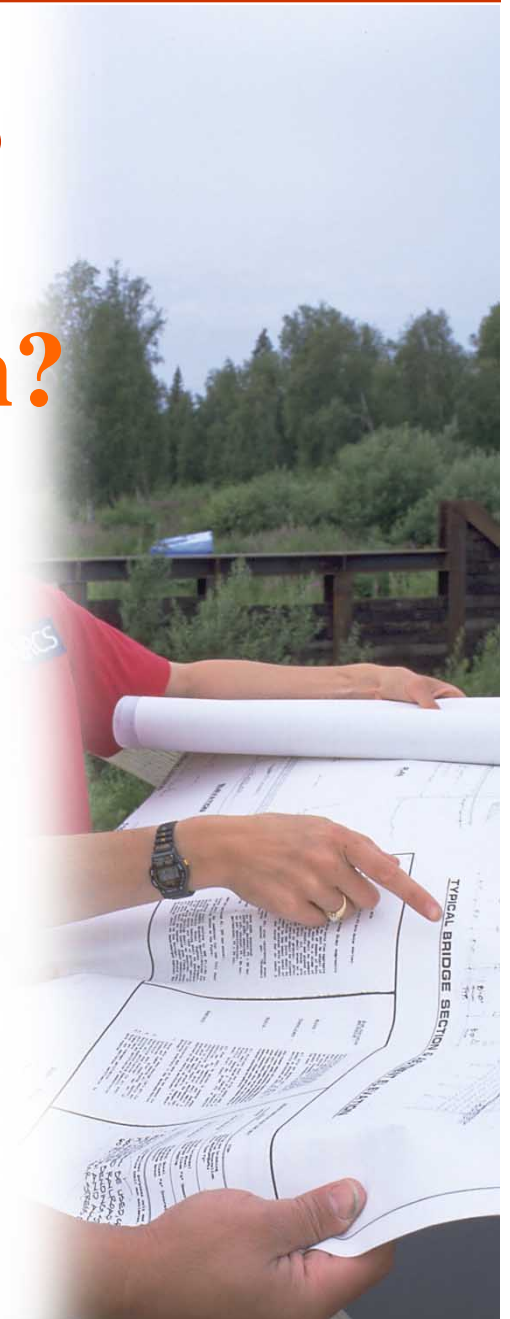
- Failure to address feed storage leachate
- Addition of outside feedlots/exercise areas without DNR approval
- Filter strips
- Spills



Plans & Specifications

What if I modify my operation?

- New, “to-be-built” facilities
- or
- Retrofitting or reviewing already existing facilities



Plans & Specifications

- Contact Regional staff person
- Submit three sets of plans & specifications
- Submit 90 days before construction of “reviewable” project begins
- Submit Stormwater Construction site NOI



Plans & Specifications Reviewable Projects

- Manure storage facilities
- Manure transfer systems
- Runoff control systems
- Composting facilities
- Leachate collection/treatmt. systems
- Installation of groundwater monitoring wells
- Milking center waste collection/treatmt.



Plans & Specifications

- DNR will state in writing any conditions of approval or reason for rejection.
- Approval of plans & specs is not to be construed as a department determination on the issuance of a WPDES permit.



Plans & Specifications

What to include:

Narrative describing project

Management and site assessment

Operation and maintenance plan

Scaled drawings

Relevant calculations



Plans & Specifications

Approval of existing facilities cannot be given statutorily

- Determine if the facility “meets the intent of the current standard”
- Usually a reporting requirement or condition in the WPDES permit
- May require upgrade of substandard facilities



Plans & Specifications

Compliance Issues

- Construction without approved plans
- Failure to provide adequate information or time for DNR review
- Piecemeal submittals
- Significant modifications of submitted plans without DNR approval
- Failure to obtain a Stormwater Construction Site permit



Monitoring & Reporting

Read permit carefully for monitoring & reporting requirements:

- **Sampling of manure**
- **Daily logs for manure application**
- **Monitoring program (self-inspection) to determine permit compliance**

(cont.)



Monitoring & Reporting

(Requirements, cont.)

- Annual reports for land application/self-inspections
- Reporting of permit violations/spills
- Schedules



Monitoring & Reporting Compliance Issues

- **Incomplete daily logs/self-inspection results**
- **Failure to meet schedule dates**
 - **Updates to Nutrient Mgmt. Plans to reflect modified permit requirements**
 - **Evaluations of existing runoff control/manure storage**
- **Failure to report spills/permit violations**



Other Compliance Issues

- **Open burning**
- **Building without a Stormwater Construction Site permit**
- **Addition of materials to storage facilities without prior approval**



Questions?

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