

Rock River Recovery Compliance Schedules

April 18, 2012

Rock River Recovery

1

TMDL Compliance Schedules

- ❖ Implementation of compliance schedules consistent with NR 217
- ❖ Determined on a case-by-case basis
- ❖ Applies to Phosphorus
- ❖ Mass limits and WQB Concentration Limits

General Facts

- ❖ Strive to achieve compliance as soon as reasonably possible
- ❖ Compliance schedules for phosphorus can range from 0-9 years, depending on factors

General Facts

Factors considered:

- ❖ How stringent is the limit?
- ❖ What is the current discharge?
- ❖ How difficult/expensive is meeting this limit?
- ❖ How much time has passed since first notified of limits?

General Facts

Schedule Possible (after permit reissued)

- ❖ Immediate compliance to 108 Months
- ❖ Yearly Accomplishments
 - ❖ - Progress reports
 - ❖ - Submittals

Step 0: Permit reissued with P and TSS limits

Step 1: Conduct operational evaluation/operation and needs review (ONR) study

Milestone: Submit study to Department for review and approval



Step 2: Facility planning

Milestone 1: Submit progress report (for stringent limits)

Milestone 2: Submit facility plan/engineering report to Department for review and approval

Step 3: Construction plans and specifications

Milestone: Submit construction plans and specifications to Department for review and approval



Step 4: Construction

Milestone: Initiate construction plans in order to meet P limit



Step 5: Meet P limit and any other compliance schedule steps specified

Step 1 – Operation & Needs Review

- ❖ Purpose: Determine if final limits can be met by making operational or other minor facility changes

Step 1 – Operation & Needs Review

❖ Factors to consider:

- Data needs/data collection
- Source reduction
- Operational changes
- Minor facility enhancements

Step 1 – ONR Continued

- ❖ If a facility can meet limits with minor improvements, a compliance schedule will be developed for when that limit must be met.
 - New limit will take effect as soon as reasonably possible
- ❖ Department will review ONR report

Step 1 - Optimization

- ❖ Facility will also be required to develop and implement an optimization plan
- ❖ Purpose: Reduce as much of the discharged phosphorus as possible without changing current operational process

Optimization Plan - Continued

❖ Factors to consider:

- Source reduction
- Operational changes such as increased chemical addition
- Good management and operation of similar treatment processes

Step 2 – Facility Planning

- ❖ Minor operational changes
- ❖ Water quality trading
- ❖ Adaptive management
- ❖ Construct significant new or upgraded treatment
- ❖ Water quality standards variance

Step 3 – Submit P&S (if necessary)

- ❖ Determine what facility upgrades and treatment technology will be added to meet P limit
- ❖ Establish date for the facility construction startup and completion
- ❖ Submit plans to Department for approval

Step 4 - Implementation

- ❖ Complete construction OR
- ❖ Develop and begin implementing adaptive management plan OR
- ❖ Successful trade

Step 5 – Compliance with All Limits

- ❖ Must comply with phosphorus limits (mass and concentration) as soon as reasonably possible
- ❖ Absolute latest date to comply is 108 months after first permit issued with new limits
- ❖ Different schedules for different limits

Typical Comp Schedule

- ❖ ONR & Optimization: 12 months
- ❖ Submit FP status report: 24 months
- ❖ Interim phosphorus limit: TBD*
- ❖ Submit facility plan: 36 months

* Site-by-Site Determination

Typical Comp Schedule

- ❖ Refine facility plan: 48 months
- ❖ Plans and Specs (if upgrading): 57 months
- ❖ Progress Reports: every 12 months
- ❖ Final phosphorous limits: TBD*

* Site-by-Site Determination

Comp Sched - draft

Expired: September 30, 2010

Permit Reissued: December 31, 2012

ONR: 12 months

- ❖ **ONR with Optimization:** Dec 31, 2013

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31, 2012

Facility plan status report: 24 months

❖ **Status report:** December 31, 2014

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31, 2012

Interim phosphorus limit: TBD

- ❖ Compliance with interim phos limit:
March 31, 2013

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31, 2012

Submit facility plan: 36 months

❖ **Facility plan due:** December 31, 2015

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31, 2012

Refine facility plan: 48 months

Submit final FP: December 31, 2016

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31, 2012

P&S (if upgrading): 57 months

❖ **Submit Plans & Specs:** Sept 30, 2017

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued: December 31,
2012

Progress Reports: every 12 months

Comp Sched - Example 1

Expired: September 30, 2010

Permit Reissued:

December 31, 2012

Final phosphorous limits: TBD

❖ **Compliance with limits:**

December 31, 2019

Comp Sched - Example 1

Permit expired: 09/30/2010

Permit reissued: 12/31/2012

Interim phosphorus limit: 03/31/2013

ONR: 12/31/2013

FP status report: 12/31/2014

Facility plan (1st stage): 12/31/2015

Final facility plan: 12/31/2016

Submit new application: 12/31/2016

Plans and Specs (if upgrading): 06/30/2017

Reissue permit: 12/31/2017

Progress Report: 12/31/2018

Final phosphorous limits: 12/31/2019

Comp Sched – Example 2

Permit expires: 06/30/2013

Permit reissued: 12/31/2012 (revoke/reissue)

Interim phosphorus limit: 06/30/2013

ONR: 12/31/2013

FP status report: 12/31/2014

Facility plan (1st stage): 12/31/2015

Final facility plan: 12/31/2016

Submit new application: 12/31/2016

Plans and Specs (if upgrading): 09/30/2017

Reissue permit: 12/31/2017

Progress Report: 12/31/2018

*Final phosphorous limits: 12/31/2020**

Comp Sched – Example 3

Permit expires: 06/30/2016

Permit modified: 12/31/2012 (modified)

Interim phosphorus limit: 06/30/2013

ONR: 12/31/2013

FP status report: 12/31/2014

Facility plan (1st stage): 12/31/2015

Reissue permit: 06/30/2016

Final facility plan: 12/31/2016

Submit new application: 12/31/2016

Plans and Specs (if upgrading): 09/30/2017

Progress Report: 12/31/2018

*Final phosphorous limits: 12/31/2019**