# Challenges to Nutrient Permitting

**Breakout Discussion Session** 

#### Goal

 Spark discussion and ideas regarding solutions to nutrient permitting challenges

 Pinpoint ideas for discussion at futu meetings If you were president for a day, what would you change?

### **Small Group Discussion**

- Identify 1 or more challenges to discuss amongst the table
- Come up some specific changes, modifications or solutions to report out to the larger group.
- Elect (or volunteer) a spokesperson to report out to the larger group

## Challenges to Nutrient Permitting

- 1. Lack of guidance specific to nutrient permitting
- 2. Toxics approach/assumptions for permit writing too conservative
- 3. Lack of experience with modeling and data
- 4. Lack of authority to collect ambient data about nutrient pollution through NPDES permits
- 5. Resource intensive to integrate decisions with other CWA programs (TMLDs, Monitoring, permitting, standards development)
- 6. Gap between what technology can achieve and permit requirements

#### Challenges to Nutrient Permitting

7.

8.

9.

10.