

PERMITTING AND STANDARDS STAFF COORDINATION IN THE DEVELOPMENT OF IMPLEMENTATION TOOLS

Matt Claucherty Permits Section



Phosphorus Implementation Coordinator





• AMERICA'S DAIRYLAND • CHEESE

DEC WISCONSIN

ABC-123

America's Dairyland



2016

NPDES / WPDES

- DNR = Wisconsin Delegated Entity
- 641 Municipal Facilities
 (529 w/surface water outfalls)
- 322 Industrial Facilities

 (209 w/surface water outfalls)
- Various General Permits
- Wastewater Program = ~80 Staff
 - 5 Regions
 - Central Permits and Industrial Sections



Wastewater Program Staff





Statewide Phosphorus Criteria



• Growing Season Median Value (6 samples min)

Standards = Limits

- 529 Municipal Facilities
 - 320 Municipal Facilities @ .075 or .1 mg/L
- 209 Industrial Facilities

• 125 Industrial Facilities @ .075 or .1 mg/L

Roughly 60% of dischargers receive a WQBEL set equal to the criterion

Limits = Expense

- Median cost to meet stringent P limit = ~\$4 million net present value
- Statewide = \$6 Billion

Phosphorus Reduction in Wisconsin Water Bodies

> An Economic Impact Analysis August 13, 2012

Prepared by: The Wisconsin Department of Natural Resources

8/13/12

Expense = Options Required

- Compliance Schedule
- Adaptive Management
- Water Quality Trading
- Variance (multiple discharger)
 - County Payment Option
 - Self Directed Project Option
- Variance (individual)
 - -Type II HAC
 - -Type III HAC





Options = Complex Permitting

WFDES Permit No. WI-6023931-09-0	
WPDES PERMIT STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES PERMIT TO DISCHARGE UNDER THE WISCONSIN POLLUTANT DISCHARGE ELIMINATION SYSTEM	
Annuan remnited, under the authority of Clayter 28, Wisconia Stuthutes, to discharge from a heality located at 1968 Highway J East, Novalk, WI ¹⁰ Moore Creek located in the Upper Kickapoo River Watershed of the Lower Wisconia River Drainage Bank, in Marsee Courty in accordance with the effluent limitions, monotrong requirements and other conditions set forth in this permittee disclosures after the date of expiration. If the permittee whiles to continue to disclayee after the sea application able belle of researchings. If the permittee whiles to continue to disclayee after the searching to the searching of the permittee whiles to continue to disclayee after the seguritoring date as applicational by left of researchings of the permittee whiles to continue to disclayee after the sequence of the searching according to Clayter NR. 200, Wis.	
Parame - control at team to you by parameter of watering and the segmentation and given Bollow. States of Watering Constraints and Statements Field Supervises By Lacey Hillman Wastenuter Field Supervisor Date Premit Signed Issued PERNIT TERM: EFFECTIVE DATE - March 01, 2019 EXPERATION DATE - Docember 31, 2023	

- All permittees have questions
- All staff have a role in implementation

History - WQT

- In 1997, three water quality pilot areas were created by statute.
- Spurred the development of quantification methods and set groundwork for current trading program.
- Statutes again updated in 2010 and 2014
- Stakeholder groups convened for 2013 WQT Guidance



Wastewater Staff Roles

- WQBEL Calculator
 - Derives limits from criteria
 - Determines reasonable potential
 - Downstream protection
- Permit Drafter
 - Coordinates all aspects of the permit
 - Understands compliance schedules
 - Integrate option-specific language
 - Works with permittee to address concerns

Wastewater Staff Roles

- Compliance Staff / Basin Engineer
 - Reviews schedule reporting
 - Phosphorus compliance schedule reporting:
 - Operation/needs evaluation
 - Optimization plan
 - Preliminary compliance alternatives plan
 - Final compliance alternatives plan
 - Variance reporting during permit term
 - Facility-specific expertise
 - Most likely to foster positive relationship
 - Role in planning process

Wastewater Staff Roles

- Statewide Variance Coordinator
 - Leads variance functional group
 - Drafts difficult/complex permits
- Statewide Phosphorus Coordinator
 - Leads AM/WQT functional group
 - Alternative phosphorus compliance
- Both:
 - Interface with EPA, draft guidance and permit language, review for statewide consistency

All Wastewater Staff:

- Provide facility-specific information in variance package submittal
- Meet or call with permittee during the planning process
- Ask Questions! involve other staff as needed

Functional Groups

- AM/WQT Coordinators
- Compliance Staff
- General Permits
- Groundwater
- Permit Drafters
- Pretreatment
- WQBEL Calculators
- Variance Team

AM/WQT Functional Group

- Regional AM/WQT Coordinators (6)
 - Reviews and approves AM/WQT Plans
 - Meets with permittees during planning process
 - Various backgrounds and positions within the department
 - ~20% of time devoted to AM/WQT duties (biweekly group calls)
- Other experts as needed (4) (Permit Drafter, TMDL, MS4, Management)

Water Quality Trading

- **18** Implemented (In Permit)
- **25** Approved
- 12 Under Development

GDP:

- 10,235 lbs/yr Credit
- 18,502 lbs/yr Reduction

Average trade ratio 1.8:1





Statewide Coordinators

- Runoff Management NPS Coordinator
 - Agricultural / Soil Health Expert
 - CAFO Background
 - -9 Key Element Plans
- Water Evaluation (Standards)
 - Water Quality Modeler
 - -TMDL Developer
 - MS4 and Consulting Background

SnapPlus

Nutrient Management for Wisconsin









ALLANDAL AL

USDA ONRCS United States Department of Agriculture Natural Resources Conservation Service



University of Wisconsin-Extension

Using SnapPlus:

- Define TMDL baseline as an edge-offield number based on surveys/data
- Apply reach-specific % reduction
- Agricultural load allocation as an edge of field number
- Recent analyses indicate a systemsbased approach can go lower.

- Cover crops, tillage, buffer, nutrient mgt

• Do we have field TBELs and WQBELs?

Inter-Program

- Water Quality Bureau
 - Water Evaluation (Standards)
 - Monitoring
 - Lakes and Rivers
 - Water Resources Field Office Staff
- Key Interactions:
 - -TMDL Development
 - Standards Development
 - Local Issues and Efforts

Coordination with External Entities

- University of Wisconsin
 - Pollutant Modeling to facilitate WQT
- County Conservation Departments
 - May act as broker for nonpoint source projects
- NGOs
 - May broker WQT, may provide input on policy, further science, or even object
- Other Agencies Federal & State (USGS, NRCS, DATCP, EPA)

Anecdotes from Wisconsin

- Variances: Sensitive to economics but keeps phosphorus on the table
 - HAC provisions necessitate P removal for nearly all facilities
- Mass Hysteria: If it doesn't kill you it makes you stronger
 - "State is only asking for CPR and county payment..."
- Stringent P limits help bring awareness to NPS issue

For more information:

- <u>https://dnr.wi.gov/topic/surfaceWater/waterQualityTrading.html</u>
- <u>https://dnr.wi.gov/topic/SurfaceWater/adaptivemanagement.html</u>
- <u>https://dnr.wi.gov/topic/surfaceWater/phosphorus/</u>
- Wisconsin Nutrient Reduction Strategy

2012

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Wisconsin's Nutrient Reduction Strategy 2015 — 2016 Implementation Progress

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