



# OWM Update

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ACWA NUTRIENT WORKSHOP MAY 1 – 3, 2023

# Recent EPA Activities

## PERMIT WRITERS TRAINING FOR NUTRIENTS

- In January 2023, EPA released the [NPDES Permit Writer's Specialty Training: Addressing Nutrient Pollution in NPDES Permits online training course](#)
- This training builds on the basic NPDES Permit Writers' Course, but is adapted to consider specific challenges permit writers face when permitting discharges of nutrients.
- EPA intends to develop three additional modules covering tools for flexibility in nutrient permitting, including permit compliance schedules and water quality standards variances, watershed-based permitting, and water quality trading.

The image shows a screenshot of the EPA NPDES Permit Writer's Specialty Training course interface. The top section is titled "Overview of Nutrient Pollution and NPDES Permitting" and "Addressing Nutrient Pollution in NPDES Permits". It lists three main modules: "Introduction to Nutrients and NPDES Program", "WQBELs for Nutrients", and "Tools for Flexibility". Each module has a list of parts. The "Introduction to Nutrients and the NPDES Program—Part 1" module is currently selected, showing a table of contents with 6 parts. The bottom section shows a video player with the title "Overview of Effluent Limitations for Nutrients" and "INTRODUCTION TO NUTRIENTS AND THE NPDES PROGRAM—Part 2". The video player includes a menu, search bar, and navigation controls.

Overview of Nutrient Pollution and NPDES Permitting

### Addressing Nutrient Pollution in NPDES Permits

- Introduction to Nutrients and NPDES Program**
  - Part 1 — Overview of Nutrient Pollution and NPDES Permitting
  - Part 2 — Overview of Effluent Limitations for Nutrients
- WQBELs for Nutrients**
  - Part 1 — Identifying the Applicable Water Quality Standards
  - Part 2 — Interpreting Nutrient Criteria
  - Part 3 — Selecting a "Reasonable Potential Analysis" Approach
  - Part 4 — Selecting Critical Conditions and Determining the Need for WQBELs
  - Part 5 — Calculating WQBELs
  - Part 6 — Finalizing Effluent Limits and Monitoring Requirements
- Tools for Flexibility**
  - Part 1 — Permit Compliance Schedules and WQS Variances
  - Part 2 — Watershed-based Permitting
  - Part 3 — Water Quality Trading

Introduction to Nutrients and the NPDES Program—Part 1 23 EPA

Menu Notes Resourc...Acrony...  
Introduction to Nutrients and the NPDES Program-Part 2  
1. Overview of Effluent Limitations for Nutrients  
2. Presenters  
3. Addressing Nutrient Pollution in NPDES Permits  
4. Technology and Water Quality-based Effluent Limitations  
5. Technology Standards and TBELs: Clean Water Act Requirements  
6. Implementing CWA Technology Standards for POTWs  
7. Implementing CWA Technology Standards for Non-POTWs

## Overview of Effluent Limitations for Nutrients

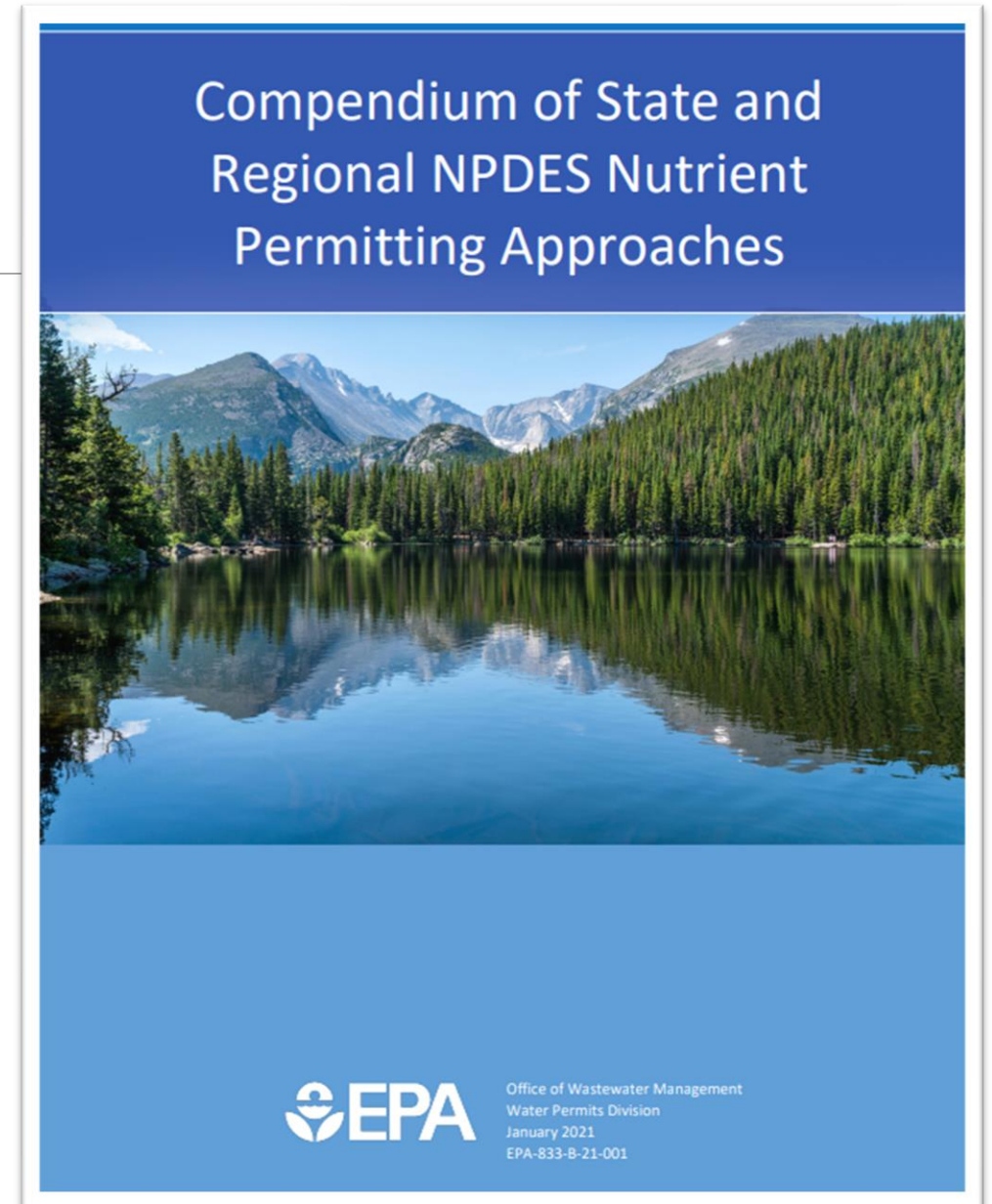
INTRODUCTION TO NUTRIENTS AND THE NPDES PROGRAM—Part 2

EPA United States Environmental Protection Agency

# Recent EPA Activities

## NUTRIENT COMPENDIUM

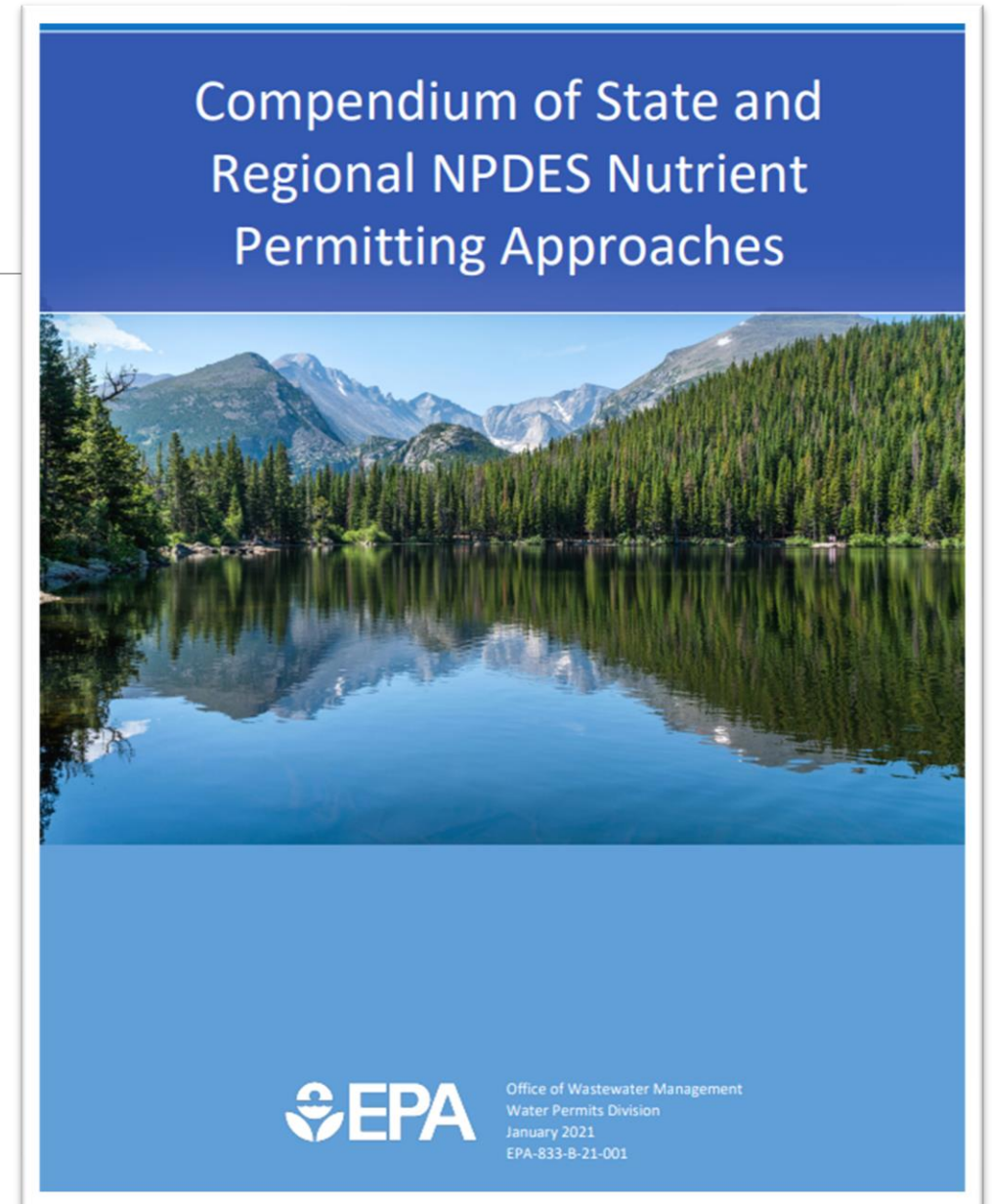
- Part one of the [Compendium of State and Regional NPDES Nutrient Permitting Approaches](#) released on April 11, 2022.
- Two rounds of updates in 2022.
- **Let us know if you have any edits/updates for a 2023 update.**

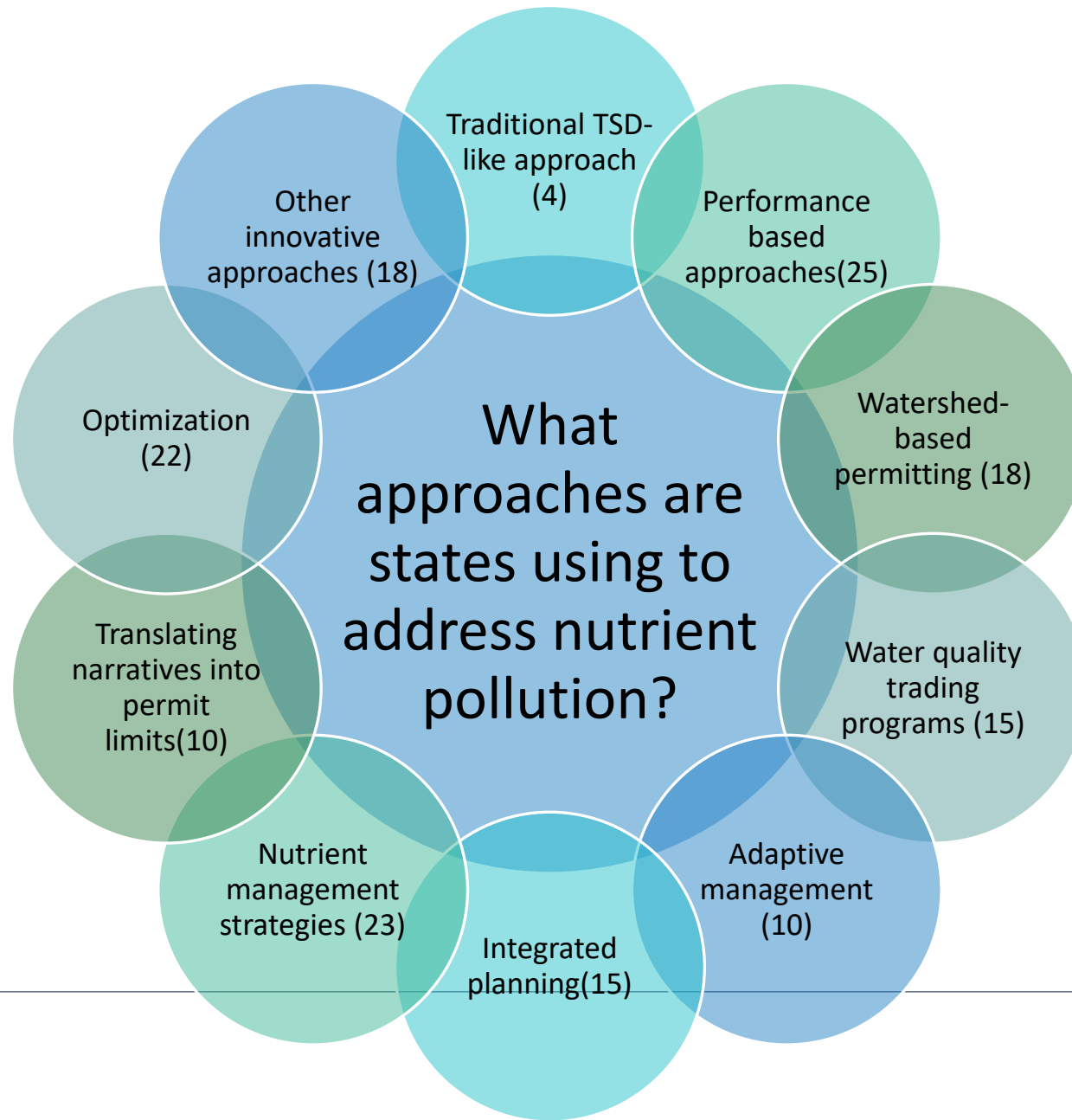


# Recent EPA Activities

## NUTRIENT COMPENDIUM

- On March 23, 2023, Jasper Hobbs sent the planning materials for “Part 2” of the compendium.
  - Adaptive Management
  - Nutrient Framework strategies
  - Integrated planning
  - Permits with limits derived from Narrative nutrient WQS
  - Optimization
  - Other state approaches
- **State comment/review due by May 15<sup>th</sup>.**





What approaches are states using to address nutrient pollution?

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Traditional TSD-like approach (4)

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Performance based approaches (25)

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Watershed-based permitting (18)

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Water quality trading programs (15)

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Adaptive management (10)

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Integrated planning(15)

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Nutrient management strategies (23)

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Translating narratives into permit limits (10)

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Optimization (22)

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Other innovative approaches (18)

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# Recent EPA Activities

## WATERSHED-BASED PERMITTING

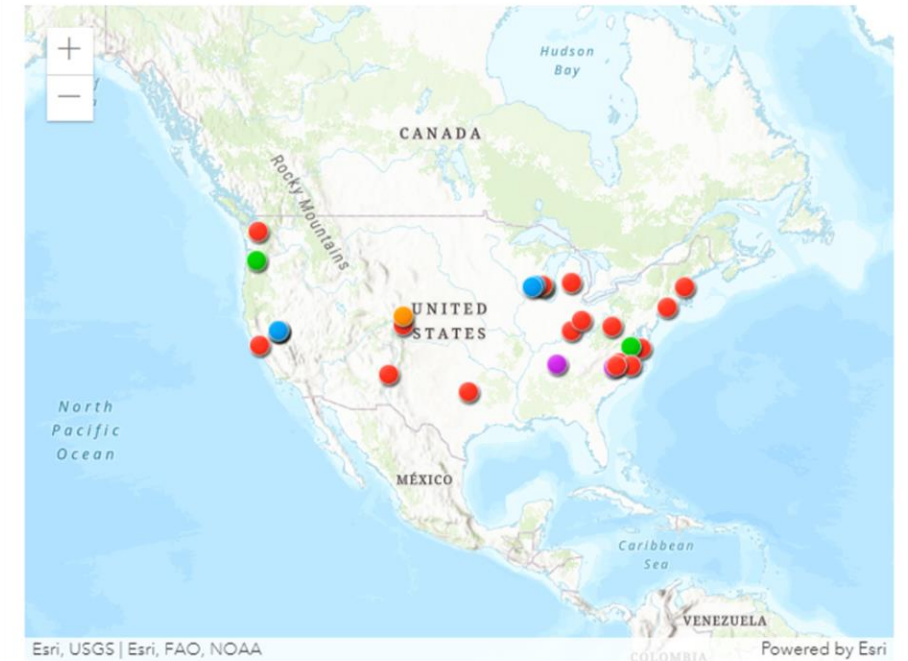
- Updated [website](#) to include:
  - a map of all the Watershed-based permitting case studies
  - Released 7 new or updated case studies

### Case Studies

To promote the innovative watershed-based permitting approach, EPA has generated a case study series highlighting EPA and state watershed-based permitting activities.

Click on the map and see the list below to learn how states are implementing watershed-based permitting approaches to achieve their water quality protection goals.

- Multisource Watershed-Based
- Coordinated Individual Permits
- Integrated Municipal Permit
- Statewide Approach
- Coordinated Watershed Monitoring



# Recent EPA Activities

## WATER QUALITY TRADING

- Update [website](#) and case studies
  - Updating content of existing case studies and developing new case studies
- Draft policy statement on flexibilities for implementing market-based approaches, including a flexible approach to baselines
- Prospective rulemaking to allow market-based approaches, including trading, under the NPDES program

## Water Quality Trading

### Highlights:

- [Water Quality Trading Policy Approaches Request for Comment](#)
- [Water Quality Trading Toolkit](#)
- [Toolkit Trading Program Fact Sheets](#) (Appendix A of the Water Quality Trading Toolkit for Permit Writers)

Water quality trading is a market-based approach that states, tribes, and territories may wish to pursue as an effective means to attain water quality improvements.

Water quality trading is an approach to control pollutants from multiple sources that collectively impact water quality conditions. When more stringent regulatory standards are put in place, water quality trading allows one source of pollution to control a pollutant at levels greater than required and sell "credits" to another source, which uses the credits to supplement their level of treatment in order to comply with regulatory requirements. Pollutant reductions achieved through water quality trading must result in water quality that is as good as—or better than—what would be achieved through treatment and must not create pollutant "hot spots."

Water quality trading can encourage private investment capital, provide additional resources for conservation, and serve as a catalyst for developing innovative, practical solutions for improving water quality at a lower cost. Water quality trading has had a critical role in implementing TMDLs and other water quality-based NPDES permit requirements. For example, many municipal

### Water Quality Trading Topics

- [Overview](#)
- [Policy](#)
- [Technical Resources](#)
- [Permit Writers Toolkit](#)
- [Frequent Questions](#)



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