

Point Source Strategic Planning Considerations for 2008-2010 and Beyond (February 8, 2008)

	<u>Issues</u>	<u>Solutions</u>	<u>Actions</u>	<u>Possible Agency/Group</u>	<u>Committed Agency/Group</u>	<u>Funding Options</u>	<u>Priority</u>	<u>Phosphorus Reduction Potential</u>	<u>Progress</u>
Treatment Technology/Technology Transfer									
A	Address stormwater footprint and impact due to growth and development.	Conduct an audit or assessment of stormwater footprint at municipal facilities.	1) WWTP facility perform assessment or audit in year 1 & implement in year 2 2) Other municipal departments/operations perform audit in year 2 & implement in year 3	WWTP, PS, Dept. Public Service/Works sites		PSs	S	1	
B	KWRP - limited funding for ongoing P removal to current low levels - could be above targeted WLA goal.	KWRP upgrade to Enhanced Biological P Removal.	1) Conduct pilot testing 2) Upgrade to Enhanced Biological Removal	PSs, KWRP	KWRP	Bonds - short-term (rate payers - long-term)	S	1	
C	PS representatives pushing their cities on urban stormwater loads, not just the WWTP options.	Determine ways to communicate stormwater information to management/operators in PSs jurisdiction and identify/track PS stormwater improvements. Use loading/cost analysis associated with urban stormwater impacts in the TMDL	1) Use new/updated information on urban stormwater contributions and costs in discussions with mgmt, stormwater operators and planning bodies within their jurisdiction 2) Identify, plan, implement and track facility stormwater improvements 3) Associated urban entities adopt same tracking system (NutrientNet)	PSs, K&A		319 Grant, PSs	S	2	
D	Pending WQ Standards for P (and N?), and effects on limits, TMDL.	Request DEQ identify timeline for establishment, anticipated numeric standards, and decision on how these will impact current TMDL and permit limits.	1) Review DEQ reports/documentation 2) Approach DEQ for numeric standards	DEQ, PSs		PSs	S	2	
E	PS P reduction cost data needed.	Individual PSs identify, track and report costs associated with P reductions.	1) PSs provide cost data with upgrades or changes (capitol, O&M, staff) 2) Technical reports by PSs on upgrade methods, pros/cons 3) Include in Annual Report summaries 4) Rotating facility visits	Individual PSs		PSs	S	2	
F	Pipe treatment and iron suppression with high phosphorus concentration chemicals.	Research alternative pipe treatments.	1) Information transfer amongst PSs 2) List appropriate and cost-effective alternative pipe treatments	PSs		PSs	S	2	
G	BNR - will these types of upgrades be needed with new P and N standards; if so, what are cost impacts?	Conduct meeting with DEQ and PSs. Determine WWTP's ability to meet new standards and consider increases in costs.	1) Consider individual WWTP facilities' ability to meet new standards and quantify resulting cost 2) Request DEQ attend PS meeting	PSs, technical consultants/engineers		PSs	L	2	
H	Reclaimed wastewater issues/opportunities - political and technical feasibility.	PSs perform assessment of opportunities.	1) Individual Point Sources propose related opportunities 2) PSs discuss at meeting who would be interested in pursuing on a broader scale 3) Seek grant funds to explore if desired	PSs, technical consultants/engineers		Grants, TMDL, KRWC	L	2	
I	Cities need to move to triple bottom line (Like Grand Rapids, KRWC).	PSs provide local examples in KR watershed and other areas of MI that are adopting triple bottom line and post case studies on PS websites. Conduct tours of facilities.	1) Provide local examples of triple bottom line adoption/implementation 2) Post case studies on website 3) Conduct tours	1) PSs/K&A technical assistance; 2) KRWC and K&A		1) PSs; 2) Current Section 319 Grant	L	3	
Growth issue in the Watershed									
J	Growth - WLA (New industry or expanded discharges) How to allow new discharges and not limit business climate - Otsego Paper sale from Menasha; Discharge coming back on line, but some new treatment modifications - DEQ - No authorization of new dischargers despite trading/offset options by rule - Watershed needs to state how we'd do this, in the face of DEQ pressure to deny	1) Re-examine previous and current PS load distribution; 2) Determine remaining margins of allocation (exceedance threshold); 3) Consider unofficial allocations/individual PS targets & current loads; 4) Push DEQ to re-examine use of trading rules consistent with Lake Allegan TMDL; 5) Request DEQ put trading back into permits or determine how to allow trading without major permit mods; 6) PSs need to discuss and form agreements; 7) Push DEQ to define permitting process.	1) PS data review 2) Calculation of remaining WLA under various scenarios 3) PS willingness to formalize and push DEQ	PSs with K&A technical assistance (possible legal assistance also needed)		PSs	S	3	

S = Short-term (<3 years) planning and/or implementation
L = Long-term (>3 years) planning and implementation
1, 2, 3 refer to the highest to lowest potential for phosphorus reductions with implementation
Underlined Text = Committed funding