

March 1, 2002

Gregory A. Danneffel, P.E.
Surface Water Quality Division
Kalamazoo District Supervisor
Michigan Department of Environmental Quality
7953 Adobe Road
Kalamazoo, MI 49009

RE: Annual Report Submittal for the Kalamazoo River/Lake Allegan Watershed
Cooperative Agreement for the Reduction of Phosphorus Loading

Dear Mr. Danneffel:

On behalf of the signatories of the Kalamazoo River/Lake Allegan Watershed Cooperative Agreement for the Reduction of Phosphorus Loading (hereafter known as "Cooperative Agreement"), this report is being submitted as required in item 7 of the Cooperative Agreement. The required six (6) elements are addressed to the extent possible given that the Cooperative Agreement was finalized in 2001 and the Implementation Plan (as specified in item 5 of the Cooperative Agreement) has not yet been submitted.

Please note that there are 30 signatories to the Cooperative Agreement (see Attachment #1 – "List of Signatories") including the Michigan Department of Environmental Quality (MDEQ). As you are aware, Ms. Jenny Molloy and Mr. Steve Norton of your office, have been regularly attending meetings regarding the Cooperative Agreement and the associated Implementation Plan over the last year.

This is the first of several annual reports that will outline the activities conducted by the Point Source (PS) Group. Most members of this group have been meeting and actively involved in the development and implementation of a phosphorus reduction strategy for the watershed since 1998. There has been and continues to be a tremendous amount of commitment and effort put forth to ensure successful achievement of improvements to the Kalamazoo River/Lake Allegan watershed.

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Detailed below is a brief summary of activities conducted in 2001 related to the requirements specified in item 7 of the Cooperative Agreement.

I. Summaries from the semi-annual meetings

Twelve meetings were held in 2001 and were attended by various Point Source (PS) dischargers. The dates for these meetings are attached for your information and review (see Attachment #2 – Meeting Dates and Locations).

The initial meeting on January 24, 2001 deserves particular mention. Representatives from the U.S. Environmental Protection Agency (USEPA), (both Headquarters and Region V personnel) attended this meeting. This provided the opportunity for the USEPA to clarify issues and concerns that their personnel had regarding the Cooperative Agreement. This assisted in generating the Cooperative Agreement as soon as feasible and to incorporate appropriate language referencing the Cooperative Agreement in the various National Pollutant Discharge Elimination System (NPDES) permits for the Point Source (PS) signatories.

Discussions at subsequent meetings in 2001 involved issues and concerns regarding the generation of an acceptable and workable Implementation Plan to meet the goals as set forth in the Cooperative Agreement in order to achieve the water quality goals established for Lake Allegan by the Michigan Department of Environmental Quality (MDEQ).

Currently, the PS Group is working on finalizing the Implementation Plan and is devising a general organizational structure to assist in carrying out the work that will be specified in the Implementation Plan.

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II. Progress made on each item identified in the implementation plans.

Due to the relative recent signing and implementation of TMDL language in the reissued NPDES permits for most of the Cooperative Agreement signatories, an Implementation Plan is being prepared and finalized prior to submittal by the May 1, 2001 deadline established in the Cooperative Agreement.

The Implementation Plan is to be submitted within one (1) year of the effective date of the Cooperative Agreement. The Implementation Plan, with associated elements, will be submitted by the date specified in the Cooperative Agreement.

III. Changes in the implementation plans in response to new challenges.

No new challenges have been encountered yet. Several issues have arisen in the development of an Implementation Plan that will be outlined in that document. Several meetings of the entire Implementation Plan Group have resulted in many ideas and suggestions relating to non point source (NPS) involvement as well as to Phase II storm water control strategies.

IV. Local success in phosphorus control.

As the Implementation Plan is formulated and then executed, new strategies and successes in the control of phosphorus discharges will be noted in future annual reports.

V. Summary of the PS phosphorus effluent data and control methods.

A summary of results for total phosphorus discharged over the six-month period as specified in the Cooperative Agreement for 2000 and 2001 by the signatories is attached (see Attachment #3 – Table 4 and Table 2). As specified in the Cooperative Agreement, this data assessment is based on phosphorus reductions projected from 1998 phosphorus data submitted by the signatories.

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Overall, there has been some success in achieving reductions to the Kalamazoo River/Lake Allegan watershed by some of the PS signatories. Several items related to this data summary need to be noted in order to adequately assess this

information and to evaluate the overall success in meeting the Cooperative Agreement goals.

At several of the 2001 meetings, there was considerable discussion regarding the use of the year 1998 as a baseline as well as the impacts (or benefits) of reduced phosphorus discharges throughout the months not specified in the Cooperative Agreement. These issues will be explored in the Implementation Plan and will be discussed in future annual reports.

Also attached (see Attachment #4 – Various PS Phosphorus Reduction Strategies) is a summary of activities that various point source dischargers have undertaken in 2001 or will undertake in the near future to control and reduce phosphorus discharges from their respective facilities.

Please also note that Kieser & Associates has been working with the PS Implementation Group in the preparation of an Implementation Plan. This work is funded through a modest Kalamazoo Foundation grant that was applied for and received in 2001. A website has been developed and is currently being used to begin the data handling and tracking process for both PS and NPS dischargers to the Kalamazoo River/Lake Allegan watershed. This website (www.kalamazooriver.net) provides a wide variety of information on the watershed and is being provided by Kieser & Associates as in-kind services associated with the grant mentioned above. One of the goals of the website is to achieve a means of collecting and summarizing phosphorus discharge data that is readily accessible to Cooperative Agreement signatories and any other interested parties.

- VI. Summary of any locally derived watershed monitoring data, including trend data, as implementation proceeds.

As stated in V. above, the kalamazooriver.net website is available for access to survey some of the available information on the watershed.

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Previous to and during 2001, the PS Group became aware of many different watershed and subwatershed projects that are currently underway or will be soon in the Kalamazoo River/Lake Allegan watershed. These projects include allocated funding for several university projects, 319 grants, Phase II storm water voluntary permitting activities plus other sources of monitoring data that may be available. A complete listing for these various activities is available on the website cited above in item V. above.

One of the many strengths of this broad-based approach to the TMDL for the Kalamazoo River/Lake Allegan watershed is the wide variety of groups and individuals who have been actively involved in development of the Cooperative Agreement and have participated heavily in drafting the Implementation Plan. Further involvement is always fostered and will include any and all interested parties.

Please consider this a full and complete submittal of the annual report by the Cooperative Agreement signatories. Please call me at (616) 337-8711 if you have any questions regarding this submittal.

Respectfully submitted by:

Bruce E. Merchant
Wastewater Superintendent
City of Kalamazoo Water Reclamation Plant

On behalf of the Cooperative Agreement Signatories

Attach

C: Cooperative Agreement Signatories
Kathy Gervasi
Mark Kieser, Kieser & Associates
File

ATTACHMENT #2 – Meeting Dates and Locations

MEETING DATES

LOCATION

January 24, 2001	City of Kalamazoo Water Reclamation Plant
February 15, 2001	City of Kalamazoo Water Reclamation Plant
March 18, 2001	City of Kalamazoo Water Reclamation Plant
April 11, 2001	City of Kalamazoo Water Reclamation Plant
May 17, 2001	Griswold Auditorium, Allegan, Michigan
June 28, 2001	City of Kalamazoo Water Reclamation Plant
July 24, 2001	City of Kalamazoo Water Reclamation Plant
August 15, 2001	City of Kalamazoo Water Reclamation Plant
September 20, 2001	City of Kalamazoo Water Reclamation Plant
October 25, 2001	City of Kalamazoo Water Reclamation Plant
November 27, 2001	City of Kalamazoo Water Reclamation Plant
December 13, 2001	City of Battle Creek Wastewater Treatment Plant