

March 1, 2004

Gregory A. Danneffel, P.E.
Water 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 in Attachment 1. The Implementation Plan was formally submitted on August 29, 2002 to the Michigan Department of Environmental Quality and to Region 5 of the United States Environmental Protection Agency.

This is the third annual report and it outlines the activities conducted by the Point Source (PS) Group in 2003. 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. The PS Group met two (2) times in 2003: July 9 and November 5, 2003. Per the Cooperative Agreement, meetings will be conducted at least twice per year in 2004; once in the Spring and again in the Fall.

During 2003, the Point Source group has worked diligently to reduce phosphorus loadings from their facilities and achieved success in meeting the TMDL goals for point source discharges in 2003. See Attachment 2 for a summary of results.

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The PS Group worked diligently on several issues in 2003. First, there was considerable discussion and interest in better funding for the database tracking system at www.kalamazooriver.net. This resulted in invoices being sent to all PS Group members to help defray the cost of this service which is being provided by Keiser and Associates.

Second, late in 2003, the issue of how to handle new phosphorus discharges into the Kalamazoo River/Lake Allegan watershed. This issue was brought to the attention of the PS Group via proposed discharges from at least three (3) separate sites. A letter was sent to Ms. Jenny Molloy of your office in early December 2003 indicating that the consensus of the PS Group was to assimilate these potential new flows into the existing load allocation (LA) assigned to the PS Group. This was based on the volume and concentration of the new discharges to the watershed. Due to several facility closings plus diligent phosphorus reduction efforts by the PS Group members, the magnitude of increased phosphorus loading was not considered significant and the PS Group felt it could be dealt with under the existing load allocation.

Third, in response to a written request from Ms. Molloy in a letter dated October 9, 2003 regarding an update from each signatory the level of effort being expended on TMDL-related issues was requested. To the best of my knowledge, all signatories responded to the letter. The PS Group continues to document and expand activities associated with non-point source assistance.

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

attachments

ATTACHMENT 1

Summary of six (6) Key Elements for TMDL Annual Report

1. Summaries of the Semi-Annual Meetings

Both meetings (on July 9 and November 5, 2003) saw good attendance from most of the Point Source Group members. Key issues discussed included: monetary contribution for the web-based tracking system; involvement of key facilities for reporting and attendance; analyses and reporting for smaller non-contact cooling water dischargers; non-point source involvement concerns and issues; on-going operational concerns that hinder voluntary compliance; and, how to handle new sources of phosphorus discharges into the Kalamazoo River/Lake Allegan watershed. Please note that a copy of the attendance list from the November 5, 2003 meeting is attached.

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

Most of the efforts in this area concentrated on how facilities could assist in non-point source efforts in their particular region. The MDEQ had requested that, per the Cooperative Agreement requirements, the Point Source signatories indicate in writing to them their efforts to comply with item 3 of the Cooperative Agreement. This item outlines efforts the Point Source Group members need to take to assist non-point source dischargers by offering assistance, resources and coordination. Most of the signatories responded to the MDEQ request and a large number of the signatories have taken an active role in a variety of non-point source efforts such as: Kanoe the Kazoo; the Lake Allegan Carp Derby; the fall Kalamazoo River clean-up and festival; the October Watershed Conference (sponsored by the Kalamazoo River Watershed Council) plus numerous other localized events and projects within various sub-watersheds.

As far as specific implementation activities, the PS Group achieved compliance with the stated objectives of the Cooperative Agreement as outlined in item 5. Specific efforts included refinement of treatment activities and increased efforts with indirect dischargers to help ameliorate phosphorus discharge effects at individual point source facility.

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

The key issue in this item involved the issue of how to deal with new point source phosphorus discharges into the Kalamazoo River/Lake Allegan watershed. This issue is addressed comprehensively in the attached letter.

ATTACHMENT 1

Summary of six (6) Key Elements for TMDL Annual Report Page 2

4. Local Success in Phosphorus Control

The success in meeting the TMDL goals as a PS Group in 2003 speaks for itself. Numerous other localized projects (such as stream bank restoration projects; storm water management projects; issuance of general storm water discharge permits) have shown that there are successful ongoing cooperative efforts between the PS Group and several non-point source groups.

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

See Attachment 2 for a summary of the effluent data. Also, individual PS Group member successes can be accessed on www.kalamazooriver.net. Control methods continue to be chemical in nature (either aluminum sulfate or ferric chloride) and most facilities are well aware of the operational techniques required to meet the stated goals.

6. Summary of the locally derived watershed monitoring data, including trend data, as implementation proceeds.

Again, please reference the website www.kalamazooriver.net for much of this information. In addition, Michigan State University-Extension at Kellogg Biological Station is in the process of collecting and cataloging the various non-point source initiatives that are ongoing in the watershed. Significant discussion took place on how to quantify non-point source reductions and how to correlate that with actual watershed data. These efforts will continue in 2004.

ATTACHMENT 2

Summary Total Phosphorus Loadings for Point Sources Signatories in 2003

<u>Month</u>	<u>Total Loading (pounds)</u>
January 2003	6,666
February 2003	7,114
March 2003	7,578
April 2003	6,369
May 2003	6,086
June 2003	5,791
July 2003	5,560
August 2003	5,291
September 2003	5,575
October 2003	6,417
November 2003	6,371
December 2003	6,662

Kalamazoo River/Lake Allegan Total Phosphorus Goals for Point Sources

<u>Months</u>	<u>Total Loading Goal (pounds)</u>
April, May and June	8,700
July, August and September	6,700