

**Table 6 - Point Source Implementation Plan Elements and Schedule**

<b>Plan Elements</b>	<b>NPS Category Elements</b>	<b>Target/ Milestone</b>	<b>Completion Dates</b>
1. stakeholders	<ul style="list-style-type: none"> <li>-31 discharges, (municipal, industrial WWTPs; lagoons; cooling water)</li> <li>- Partnerships/collaboration with non-point sources (through Voluntary Agreement)</li> </ul>	<ul style="list-style-type: none"> <li>- Working tables/contact information (IP)</li> <li>- Establish working collaborations with NPS (IP)</li> </ul>	<p>May 2002</p> <p>May 2002 and ongoing</p>
2. regulations	<ul style="list-style-type: none"> <li>- NPDES (CWA; local limits)</li> <li>- EPA-approved TMDL (Waste Load Allocation)</li> <li>- Voluntary Point Source Agreement</li> </ul>	<ul style="list-style-type: none"> <li>- DMRs</li> <li>- Completed</li> <li>- Completed</li> </ul>	<p>Monthly</p>
3. goals	<ul style="list-style-type: none"> <li>- at a minimum, maintain 1998 discharge levels (April-June)</li> <li>- 23% reduction over 1998 levels for all dischargers (July-September)</li> <li>- Track reductions monthly throughout the year</li> <li><i>(Individual allocations/reductions; collective reduction; accountability structure and consequences...)</i></li> </ul>	<ul style="list-style-type: none"> <li>- WLA</li> <li>- Revisit plan as needed (IP)</li> <li>- Meet or exceed monthly goals</li> <li>- Meet seasonal goals</li> </ul>	<p>Completed</p> <p>May 2002</p> <p>Monthly</p> <p>Seasonal</p> <p>Year-round</p>
4a. ongoing efforts	<ul style="list-style-type: none"> <li>- Reductions have been noted for some facilities from 98-99 (<i>Point Sources need to provide updates</i>)</li> </ul>	<p>Consistent reporting and posting of results on website for <u>all</u> PS's (IP); achieve 100% participation</p>	<p>March 2002</p> <p>March 2003</p>

<p>4b. recommendations by P.S. Categories</p>	<ul style="list-style-type: none"> <li>- additional treatment processes</li> <li>- end of pipe chemical additions</li> <li>- wetlands treatment (small discharges)</li> <li>- alternative discharges (GW)</li> <li>- regional consolidation of smaller discharges</li> <li>- alternative discharge schedule for lagoons (March/October)</li> <li>- alternative uses/handling of cooling water (recycling, GW discharge, cooling towers)</li> <li>- pre-treatment</li> </ul>	<p>- Individual facility goals posted for all to track (IP)</p>	<p>May 2002 and ongoing</p>
<p>5. funding resources</p>	<ul style="list-style-type: none"> <li>- WWTP increased rates</li> <li>- taxes/fees for new development/connections</li> <li>- grants for innovative technologies or for research</li> <li>- trading</li> <li>-revenue neutralization of waste stream (composting, land application)</li> </ul>	<p>(IP)</p>	<p>May 2002</p>
<p>6. program resources</p>	<ul style="list-style-type: none"> <li>- MDEQ (operator training, unit P removal, joint pilot projects, assistance, support for new tools/flexibility)</li> <li>- WEF technical resources (local, state, national)</li> <li>- Private sector</li> <li>- trading</li> <li>- Grants/Demonstration projects</li> </ul>	<p>(IP)</p>	<p>May 2002</p>
<p>7. cost optimization</p>	<ul style="list-style-type: none"> <li>- individual PS determinations of cost/pound (who can do it cheapest)</li> <li>- feasibility studies/pilot programs</li> <li>- trading between PS and NPS</li> <li>- current costs</li> <li>- capital costs (for growth)</li> </ul>		

8. data gaps	<ul style="list-style-type: none"> <li>- timing of monthly loading submittals</li> <li>- monthly NPDES phosphorus sampling requirements</li> <li>- permittee and users costs to implement controls</li> <li>- future growth needs and the WLA</li> </ul>	<ul style="list-style-type: none"> <li>(IP)</li> <li>(IP)</li> <li>(IP)</li> <li>(IP)</li> </ul>	<ul style="list-style-type: none"> <li>May 2002</li> <li>May 2002</li> <li>May 2002</li> <li>May 2002</li> </ul>
9. accountability structure	<ul style="list-style-type: none"> <li>- Implementation Committee</li> <li>- PS group structure (voluntary, formal, fee)</li> <li>- Overall watershed responsibility (<i>See attached discussion figure</i>)</li> </ul>	<ul style="list-style-type: none"> <li>- establish committee leadership and structure (IP)</li> <li>- identify options (IP)</li> <li>- implement as needed</li> </ul>	<ul style="list-style-type: none"> <li>May 2002</li> <li>March 2003</li> <li>Ongoing</li> </ul>
10. reporting	<ul style="list-style-type: none"> <li>- monthly data entered into on-line data base</li> <li>- annual reporting for Voluntary Agreement</li> <li>- interim reports (monthly summaries...organizational structure?)</li> </ul>	<ul style="list-style-type: none"> <li>- Annual report</li> </ul>	<ul style="list-style-type: none"> <li>March 2002</li> <li>December 2002</li> </ul>
11. timeline	(implementation elements, reporting, reduction goals)	<ul style="list-style-type: none"> <li>(IP)</li> <li>- Annual updates</li> </ul>	<ul style="list-style-type: none"> <li>May 2002 thru 2006</li> </ul>
12. tracking	<ul style="list-style-type: none"> <li>- web tracking database</li> <li>- one database for all of TMDL process (web-based)</li> <li>- individual/voluntary</li> <li>- QA/QC (standardized procedures) (Organizational responsibility structure)</li> </ul>	<ul style="list-style-type: none"> <li>- Monthly</li> <li>- Framework drafted</li> <li>(IP)</li> </ul>	<ul style="list-style-type: none"> <li>10<sup>th</sup> of Month</li> <li>Ongoing</li> <li>May 2002</li> </ul>
13. monitoring	<ul style="list-style-type: none"> <li>- NPDES reporting</li> <li>- MDEQ compliance and enforcement monitoring</li> <li>- suitable (QA/QC'd) river/lake monitoring data , (MDEQ/ other)</li> <li>- database maintenance/accessibility</li> <li>- data analysis</li> </ul>	<ul style="list-style-type: none"> <li>- April-Sept. (DEQ report)</li> <li>- ongoing</li> <li>- post to website to keep database current</li> <li>- mechanism to be determined</li> <li>- mechanism to be determined</li> </ul>	<ul style="list-style-type: none"> <li>Monthly</li> <li>Bi-weekly</li> <li>Dec. Annually</li> <li>- quarterly at minimum</li> <li>- ongoing</li> <li>- ongoing</li> </ul>

14. contingency plan	<ul style="list-style-type: none"> <li>- (Short-term response to not meeting monthly or seasonal goals)</li> <li>- (5-year plan considerations if goals are not met)</li> <li>- (Long-range plans...new growth, new discharges, not meeting WQ improvements with/without PS goals or with/without NPS goals)</li> </ul>	<ul style="list-style-type: none"> <li>(include in IP)</li> <li>- Increase WWTP treatment to lower P output</li> <li>- Potential for on-site treatment</li> <li>- Evaluate state of the art P reduction options</li> <li>- increase NPS implementations</li> </ul>	<p>May 2002 March 2003</p> <p>March 2004</p> <p>March 2005</p>
15. updating strategy	<ul style="list-style-type: none"> <li>- through TMDL committee/authority (timing of reports/reviews/updates...yearly, 5 years)</li> </ul>	<ul style="list-style-type: none"> <li>- Annual Reports</li> <li>- 5-year permit cycle</li> </ul>	<p>(December)</p> <p>Dec. 2004</p>