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Department of Utilities
 Wastewater Treatment Plant
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TO: Chairperson Greg Dannecker and Members of the Utilities Committee

CC: Chris Shaw, Utilities Director

DATE: October 5, 2016

RE: *Draft WDNR Compliance Schedule for AWWTP WPDES Reissuance*

BACKGROUND:

The Appleton Wastewater Treatment Plant (AWWTP) Wisconsin Pollution Discharge Elimination System Permit (WPDES) is in the process of re-issuance. The permit will likely become effective January 1, 2017. The table below lists milestone dates for phosphorus compliance. The AWWTTP staff has been aware of these deadlines and has been addressing phosphorus and an array of treatment alternatives.

WDNR Required Action	Due Date
<p>Operational Evaluation Report: The permittee shall prepare an operational evaluation study report and submit it for Department approval. The report shall evaluate collected effluent data, possible source reduction measures, operational improvements or other minor facility modifications that would enable compliance with the final phosphorus WQBEL (water quality based effluent limit) or some improved level of effluent quality using the existing treatment system. Also, the operational evaluation report shall include a phosphorus discharge optimization plan for the current operation. If the report concludes that the facility can achieve the final phosphorus WQBEL, the study shall contain a schedule for implementation of any improvements or other study recommendations. The implementation schedule shall be based on providing compliance with the final phosphorus WQBEL as soon as possible. Once the operational evaluation report is approved by the Department, the permittee shall take the steps called for in the operational evaluation report and optimization plan and follow the implementation schedule as approved. If the Department approved operational evaluation report concludes that the facility cannot achieve the phosphorus limit, the permittee shall initiate a Facilities Planning Study and implementation of the phosphorus discharge optimization plan for the current operation.</p>	12/31/2017
<p>Progress Report #1: Submit a progress report on meeting the final WQBEL for phosphorus. This report shall discuss the feasibility of</p>	06/30/2018

watershed compliance options including Watershed Adaptive Management and water quality trading, and summarize potential partners, meetings, and other work efforts completed to investigate these options.	
Preliminary Compliance Alternatives Plan: The permittee shall submit a preliminary compliance alternatives plan to the Department. If the plan concludes upgrading is necessary to achieve compliance with the final phosphorus WQBELs, the submittal shall include a preliminary engineering design report. If the plan concludes Adaptive Management will be used, the submittal shall include a completed Watershed Adaptive Management Request Form 3200-139 without the Adaptive Management Plan. If water quality trading will be undertaken, the submittal shall include a completed Notice of Intent to Trade Form 3400-206.	06/30/2019
Facility Plan: Submit a Facility Plan that evaluates feasible alternatives for meeting the final phosphorus WQBEL (water quality based effluent limit) which may include: facility upgrading, consolidation with other sewerage systems, alternative effluent discharge locations, the Watershed Adaptive Management Option, Water Quality Trading Plan or a water quality standards variance.	06/30/2020
Construction Plans and Specifications: Submit construction plans and specifications for approval if the approved Facility Plan calls for upgrading the treatment facility. Submit the final water quality trading or adaptive management plan if the Facility Plan calls for one of these watershed approaches.	06/30/2021
Progress Report #2: Submit a progress report on meeting the final WQBEL for phosphorus.	06/30/2022
Complete Actions: Complete actions to meet the final WQBEL for phosphorus. Comply with the new phosphorus final limits.	12/31/2022
Phosphorus WQBELs Effective: The permittee shall achieve compliance with final phosphorus WQBELs.	01/01/2023

Please feel free to contact me if you have any comments at ph: 832-5945.