DuPage River/Salt Creek Workgroup
IEPA Update

BOW Permit Section Staff

- Darin LeCrone, P.E.
  - Manager of Industrial Unit
  - Acting Manager for Watershed/CAFO Unit

- Amy Dragovich, P.E.
  - Manager of Northern Municipal Unit
  - Acting Manager for Southern Municipal Unit

- Acting Section Manager – Rotating monthly between Darin and Amy

Illinois Approach to Nutrient Discharges

- November 2, 2011 letter to USEPA Region 5
- Response to EPA letter concerning DO and algae impaired waters
- Current activities
  - WQ standard for lakes and reservoirs
  - Effluent standard of 1 mg/L Total P for new/expanded major facilities
  - Waste load allocations in TMDL reports
  - Antidegradation assessments – Total Nitrogen and Total Phosphorus
  - DO effluent limits included in permits

Enhancements to Current Activities

- Developing nutrient TMDLs
- Additional monitoring to develop TMDLs
- Reopener clause to incorporate permit limits
- Watershed study groups
- Interim 1 mg/L Total Phosphorus effluent limit for algae or DO impaired waters
- Optimization of existing treatment facilities

Future Tools

- Future regulations to address nutrients
  - Nutrient Science Advisory Committee
    - Established to recommend numeric nutrient standards
    - Expected completion in 2018
  - Future rules will be filed with Illinois Pollution Control Board

Illinois Nutrient Reduction Strategy

- Optimize nutrient loss reduction
- Promoting collaboration, research, and innovation
- Goals:
  - Ultimate: 45% loss reductions in nitrate-nitrogen and total phosphorus
  - Interim goals by 2025:
    - 15 % reduction in nitrate-nitrogen
    - 25% reduction in total phosphorus
- Priority Watersheds for Point Sources
  - All ranked high in both Total P and nitrate-nitrogen loading

Negotiations between IAWA and NGOs Background Information

- MWRDGC Permit Appeal – Ill. Appellate Court decision Feb 26, 2016
  - "Must ensure that the permit prevents discharges of pollutants having the 'reasonable potential' of violating Illinois WQ standards contained in the narrative statements."
- MWRDGC settlement agreement –
  - Chicago Area Waterways Nutrient Oversight Committee
  - Technology based P effluent limit of 0.5 mg/L annual geometric mean by 2030
  - Feasibility study for reducing P levels – 0.5, 0.3 and 0.1 mg/L
  - Continuous monitoring gauge at Joliet, IL
- MWRDGC Calumet, Stickney and O'Brien NPDES permits reissued July 6, 2017. Permits also include interim monthly average 1 mg/L P effluent limit with compliance schedules.

IAWA and Environmental group negotiations

- To address “reasonable potential” of violating narrative water quality standards
- Promoting biological nutrient removal
- Future NPDES conditions for major facilities:
  - Technology based P effluent of 0.5 mg/L annual geometric mean by 2030
  - Exceptions include not economically reasonable
  - Implementation Plan if impaired waterbody or if waterbody has characteristics of an impaired waterbody
- Draft conditions currently being reviewed by IAWA and NGOs
- Final conditions will need USEPA approval

DuPage River/Salt Creek Special Condition

- Projects/activities identified in Implementation Plan – Annual report
- Chloride Reduction Program – Annual report
- Phosphorus Discharge Optimization Plan
- Feasibility Study for reducing P levels – 1, 0.5 and 0.1 mg/L
- Effluent P Limit of 1 mg/L with compliance schedule
- Influent/effluent monitoring for phosphorus and nitrogen
- Nutrient Implementation Plan – December 31, 2023

Mixing Study Plan

- Discharges from excess flow facilities
- Existing monitoring data
- Evaluate reasonable potential to cause or contribute to exceedances of WQ standards
- Develop WQ based effluent limitations
- Study Plan to determine if mixing is available