Understanding Compliance Schedules

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Water Quality Program
Options Considered for Issuing Permits

- Narrative Limits?
- Effectiveness Monitoring with Method 1668
- Compliance Schedule?
- Compliance Monitoring with Method 608
- Compliance Monitoring with Method 1668?
- Source Reduction/Participation in SRRTTF
- End-of-Pipe Limits?
- No Compliance Schedule?
Options Considered for Issuing Permits

- Narrative Limits?
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- End-of-Pipe Limits
- No Compliance Schedule
Permitting Option

• WQ based end-of-pipe limit (7 pg/L)
• Based on EPA Method 608 results, no schedule is needed
“Quick and Defensible” = Traditional permitting approach

Idaho

Washington

Stormwater

Spokane Tribe

2 MGD 5-160 ppq

8.6 MGD 5-160 ppq

6.8 MGD 5-160 ppq

8 MGD 5-160 ppq

56 MGD 5-160 ppq

3 - 33

6-169

9-135

0 - 60,000

10 - 207

59 - 95

Latah Creek
3500 – 8287 MGD
7 - 1053 ppq

Stormwater
5200 ppq

1 ppq
Permitting Option

- WQ based end-of-pipe limit (7 pg/L)
- Include a compliance date to meet end-of-pipe limit
Compliance Schedule Issues

• Enforceable sequence of actions or operations leading to compliance with a water quality-based effluent limitation

• Must require compliance by the permittee as soon as possible

• Based upon a reasonable finding that the schedule will lead to compliance with the effluent limitation
“Manage the end point” = compliance schedule

- **Idaho**
  - Spokane Tribe
  - 7 ppq
  - 3 - 33 MGD
  - 0 - 60,000 ppq

- **Washington**
  - Latah Creek
  - 3500 – 8287 MGD
  - 7 - 1053 ppq
  - 6 - 169

- **Spokane Tribe**
  - 56 MGD
  - 5 - 160 ppq
  - 59 - 95
  - 9 - 135

- **Stormwater**
  - 5200 ppq
  - 10 - 207

- **Other**
  - 8.6 MGD
  - 5 - 160 ppq
  - 8 MGD
  - 5 - 160 ppq
  - 6.8 MGD
  - 5 - 160 ppq

- **2 MGD**
  - 0 ppq

Note: The diagram illustrates water flow and compliance levels, with specific MGD (millions of gallons per day) and ppq (parts per quintillion) values.
Antibacksliding Issues

• The Clean Water Act prohibits the re-issuance of permit with less stringent limitations
  – However, there are exceptions!
• Could we backslide on permit limits/compliance schedules in future permit renewals?