



# Understanding Compliance Schedules

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# Options Considered for Issuing Permits

Narrative Limits?

Effectiveness Monitoring with Method 1668

Compliance Schedule?

Compliance Monitoring with Method 608

Compliance Monitoring with Method 1668?

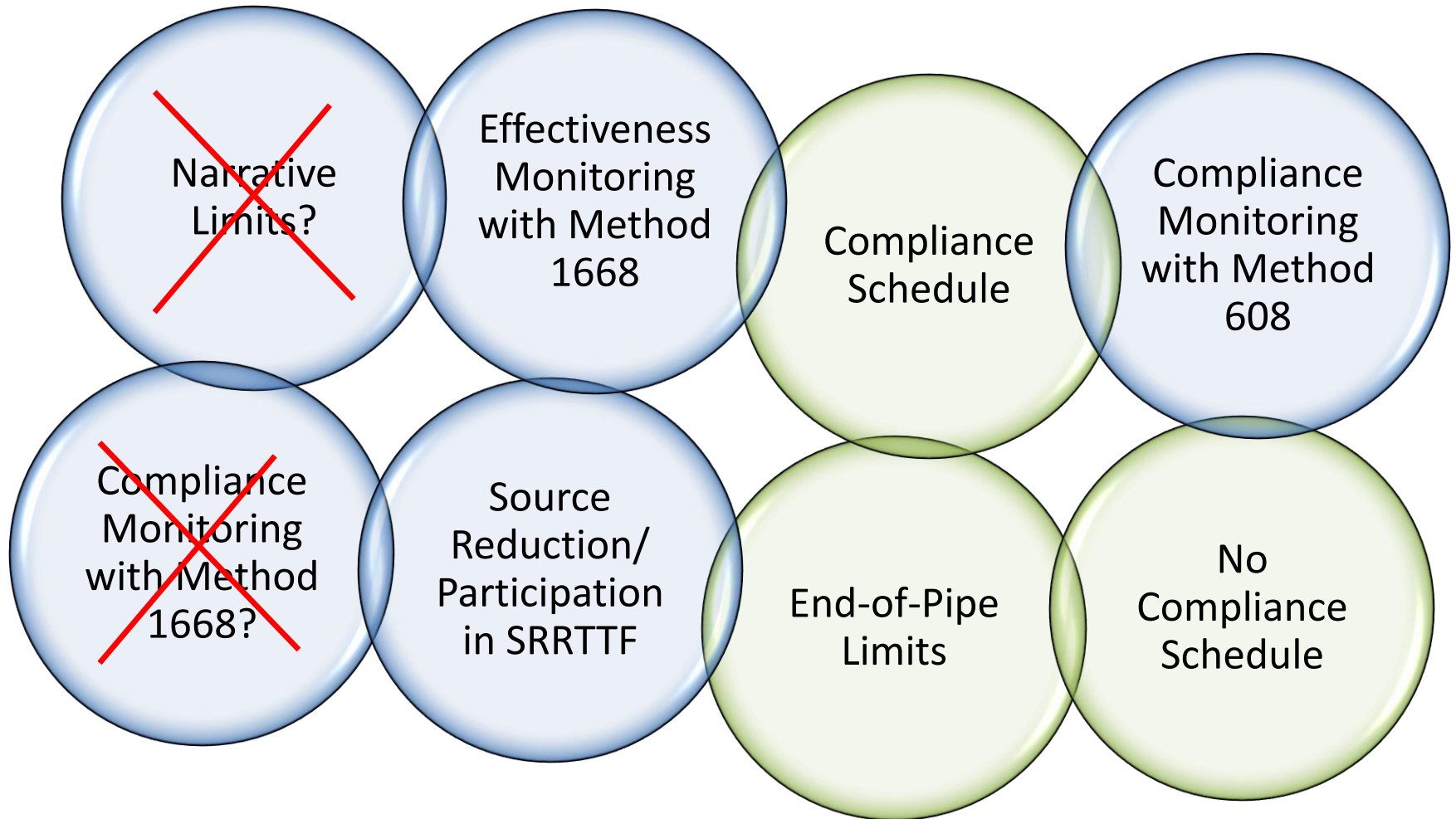
Source Reduction/ Participation in SRRTTF

End-of-Pipe Limits?

No Compliance Schedule?



# Options Considered for Issuing Permits

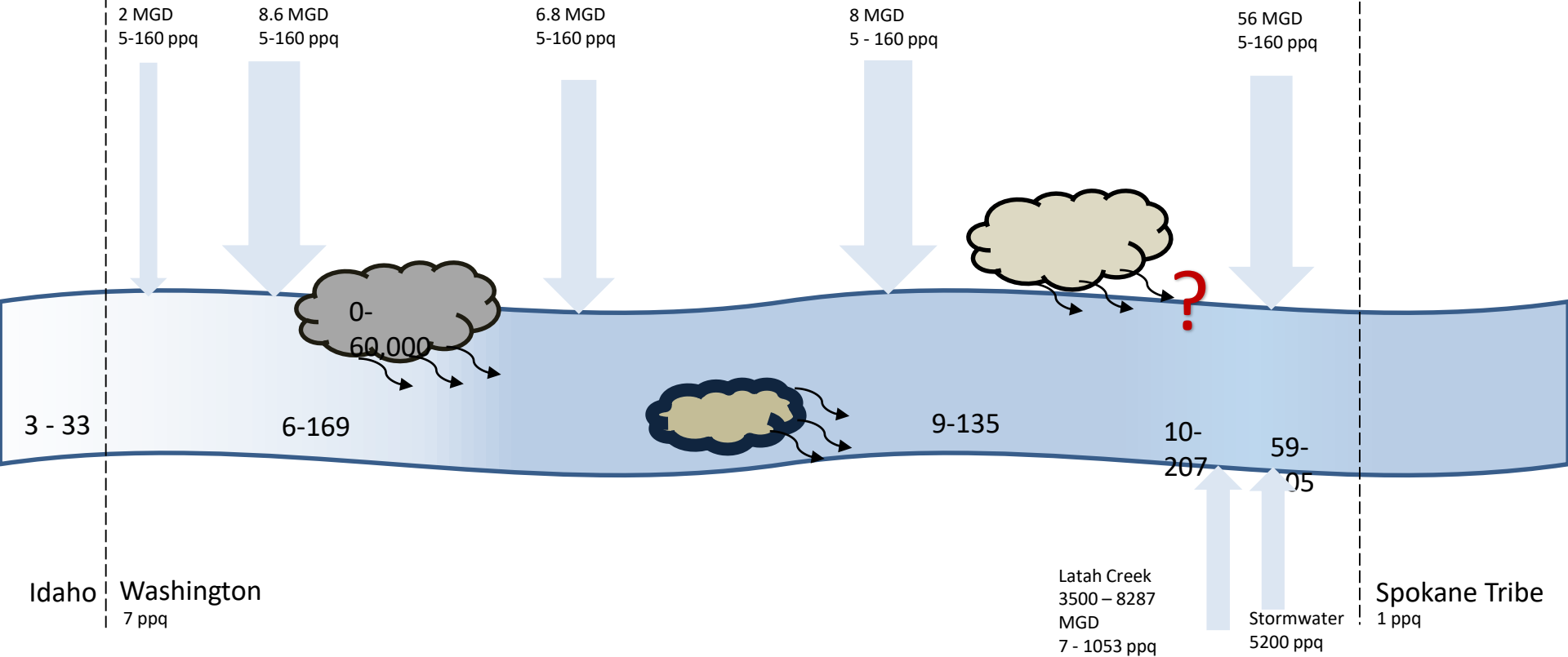


# Permitting Option

- 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



# Permitting Option

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

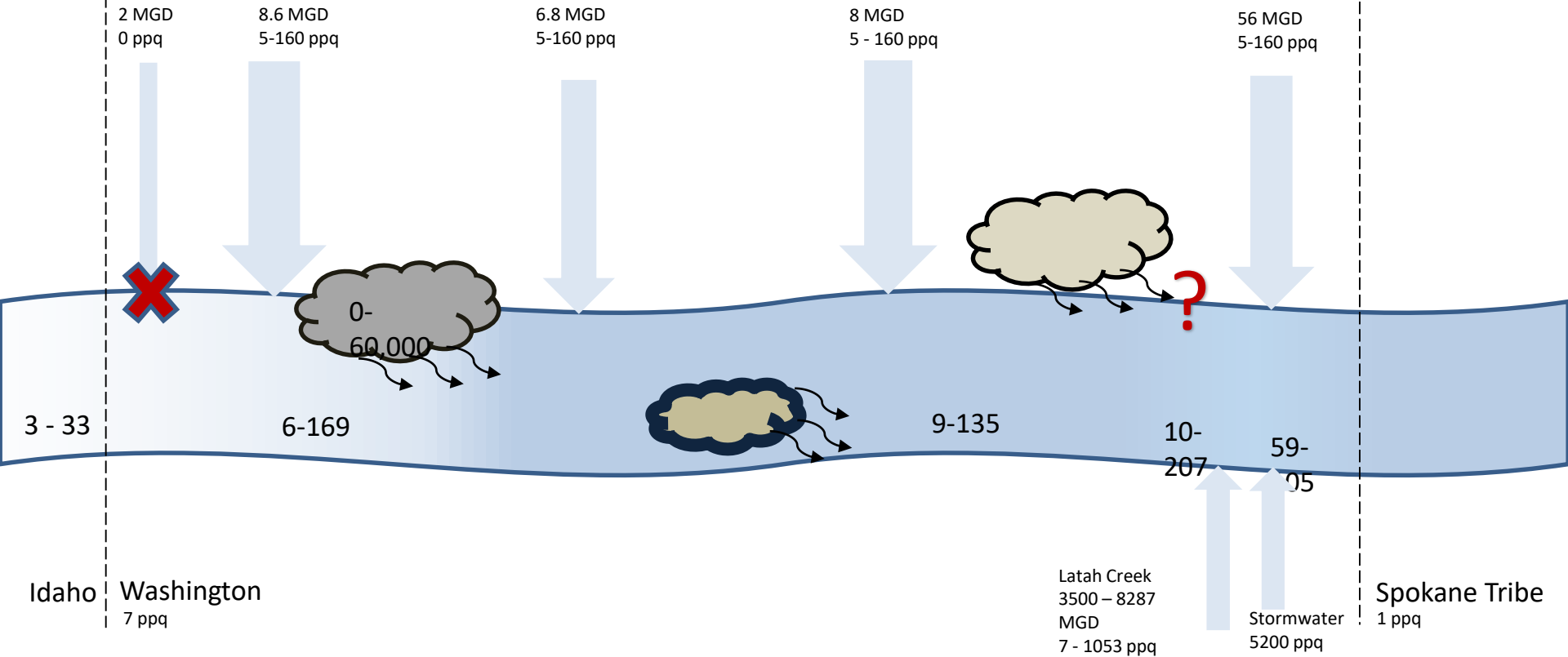


# Compliance Schedule Issues

- 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





# 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?

