



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?

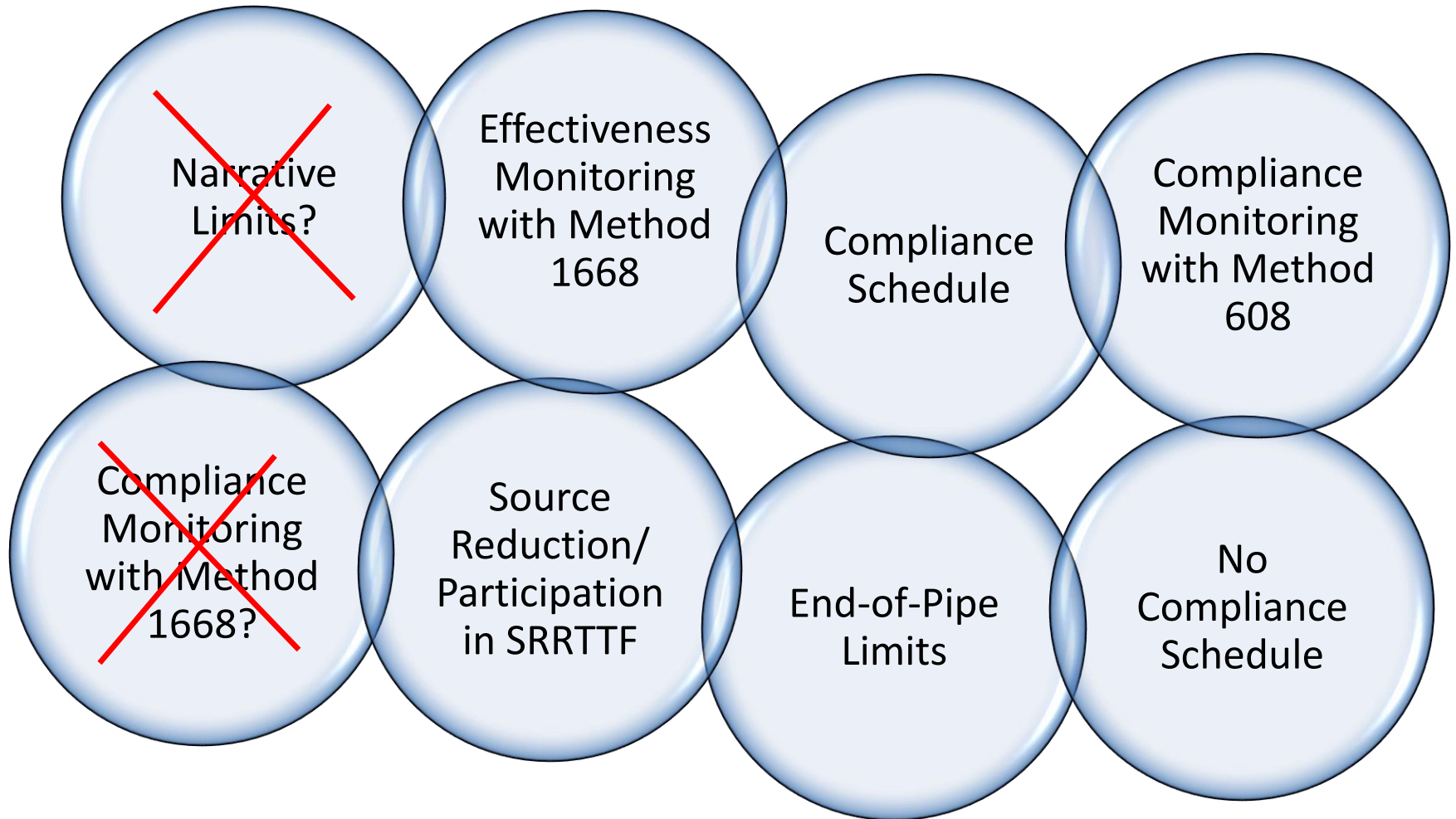
Source Reduction/ Participation in SRRTTF

End-of-Pipe Limits?

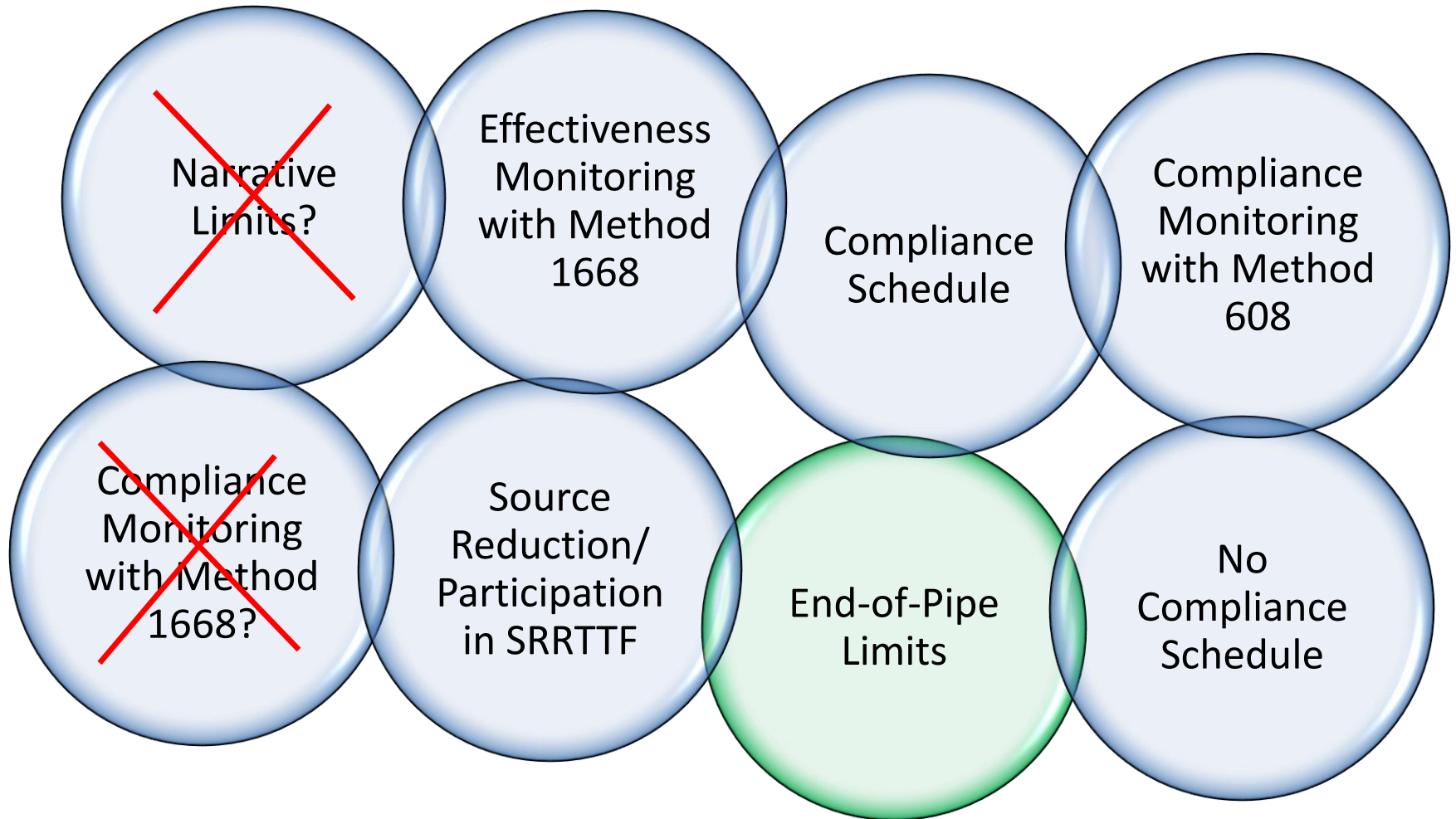
No Compliance Schedule?



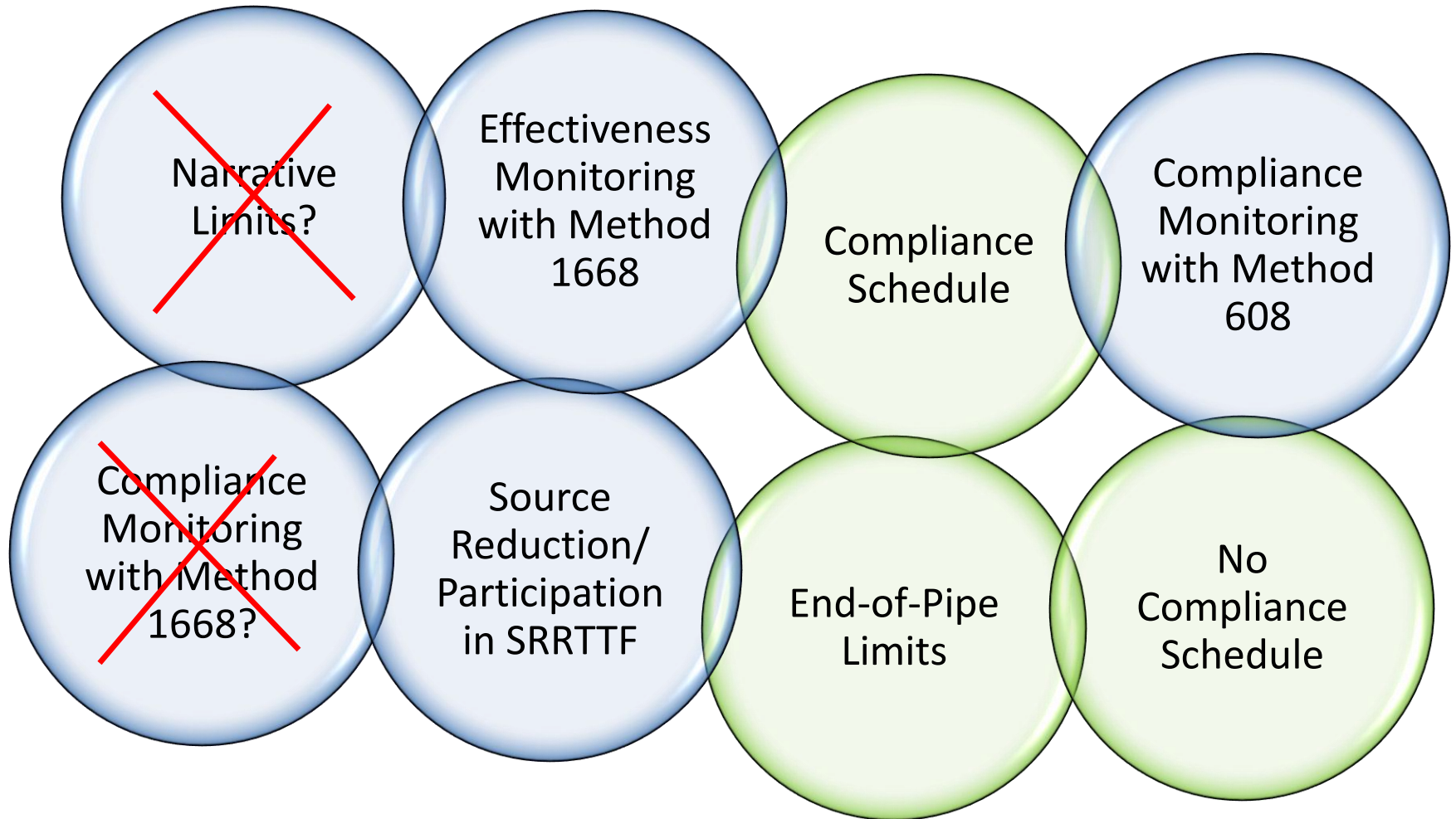
Options Considered for Issuing Permits



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What is a Compliance Schedule?

- Clean Water Act, Section 502, General Definitions:
“Schedule of Compliance” means a schedule of remedial measures including an enforceable sequence of actions or operations leading to compliance with an effluent limitation, other limitation, prohibition, or standard



Compliance Schedule Principles

Water Quality Based Effluent Limits

- EPA Guidance:

https://www3.epa.gov/npdes/pubs/memo_complianceschedules_may07.pdf

- Includes list of eleven (11) principles in developing compliance schedules to meet water quality based effluent limits

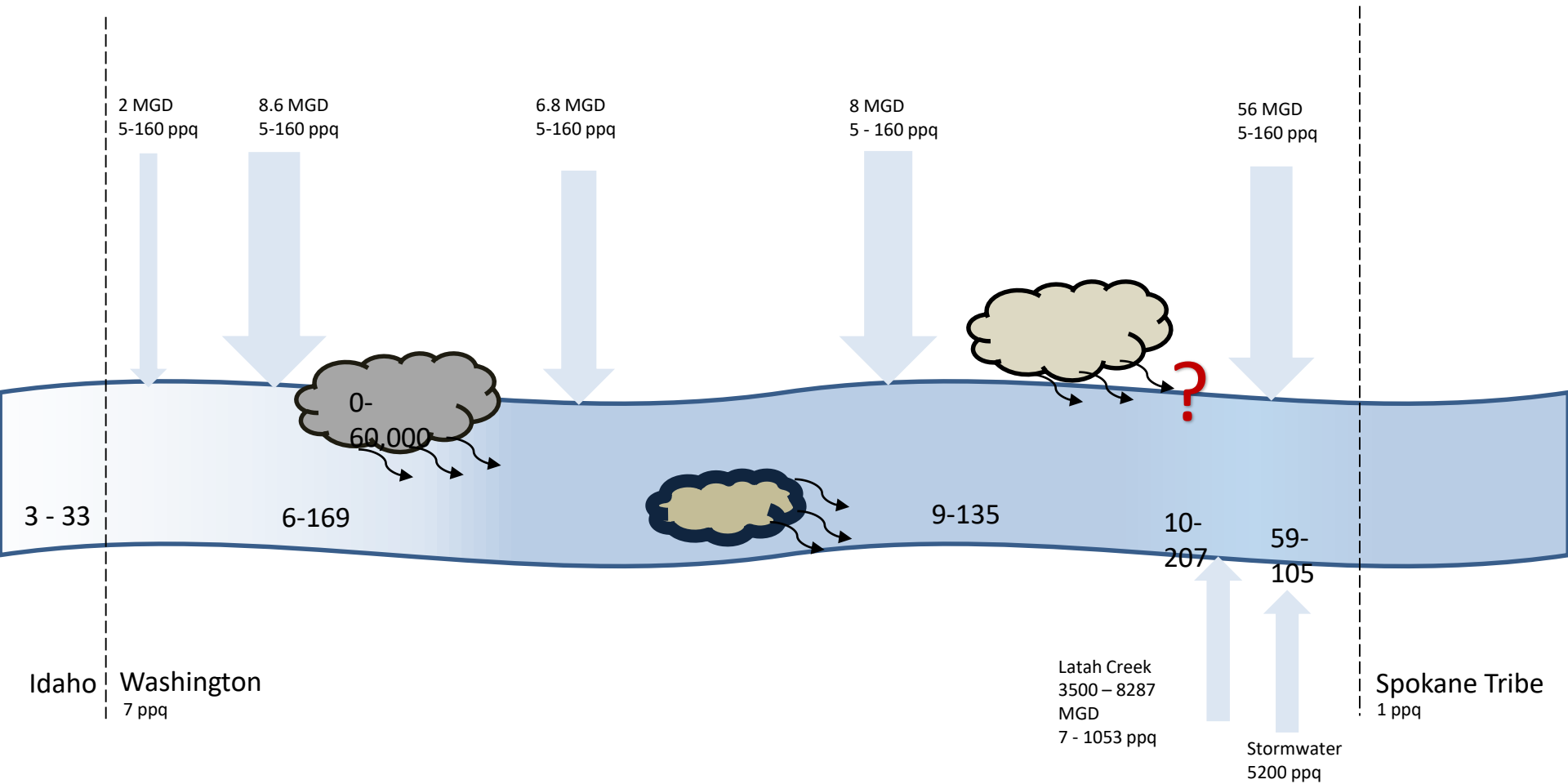


Permitting Option

No Compliance Schedule:

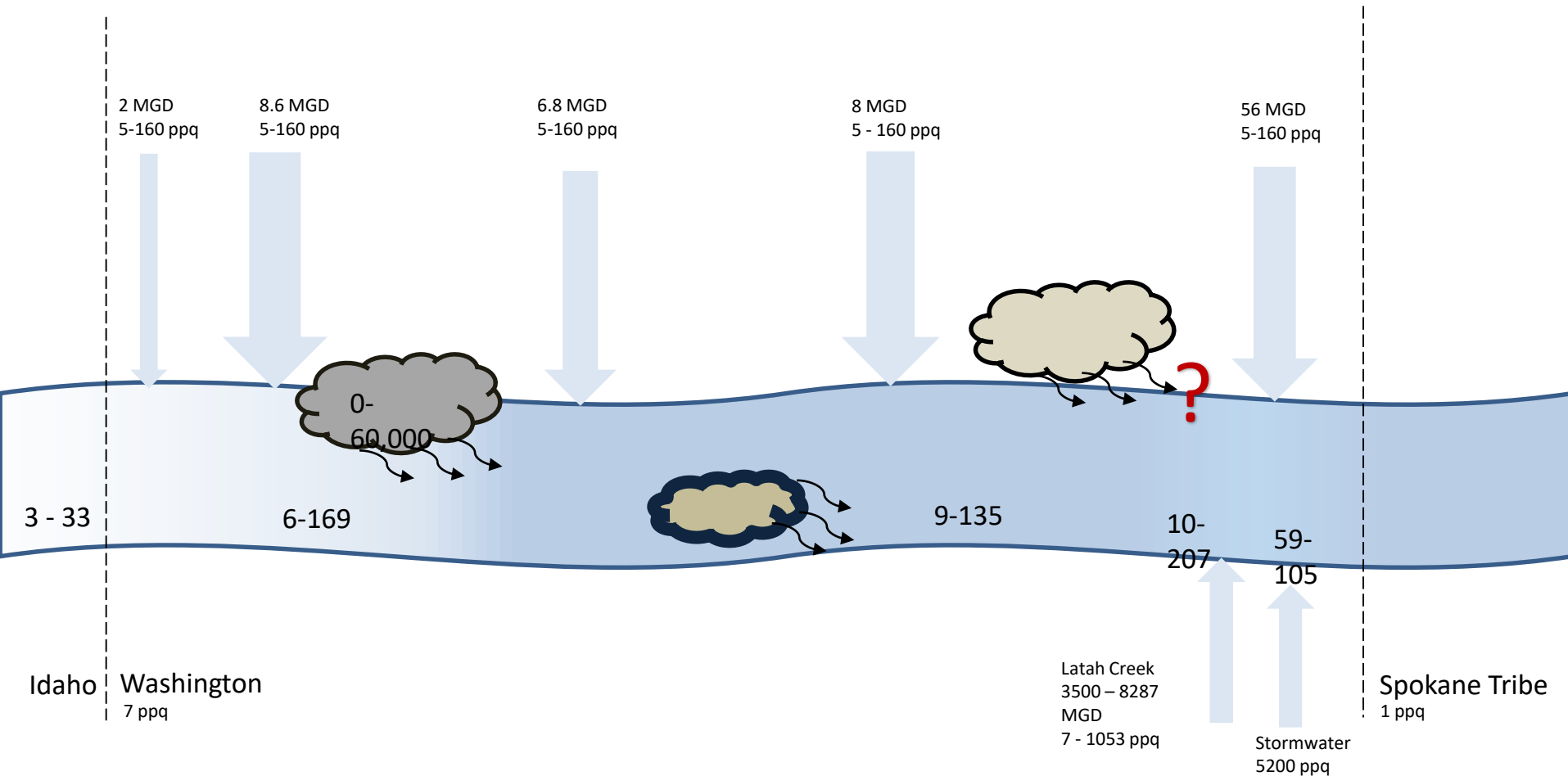
- WQ based end-of-pipe limit (7 pg/L)
- Compliance testing using EPA Method 608
- Elevated method detection level pg/L doesn't show non-compliance
- We considered the option of not setting a compliance schedule





NOTE: values are for illustrative purposes only

“Quick and Defensible” = Traditional permitting approach



NOTE: values are for illustrative purposes only

Permitting Option

Compliance Schedule:

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



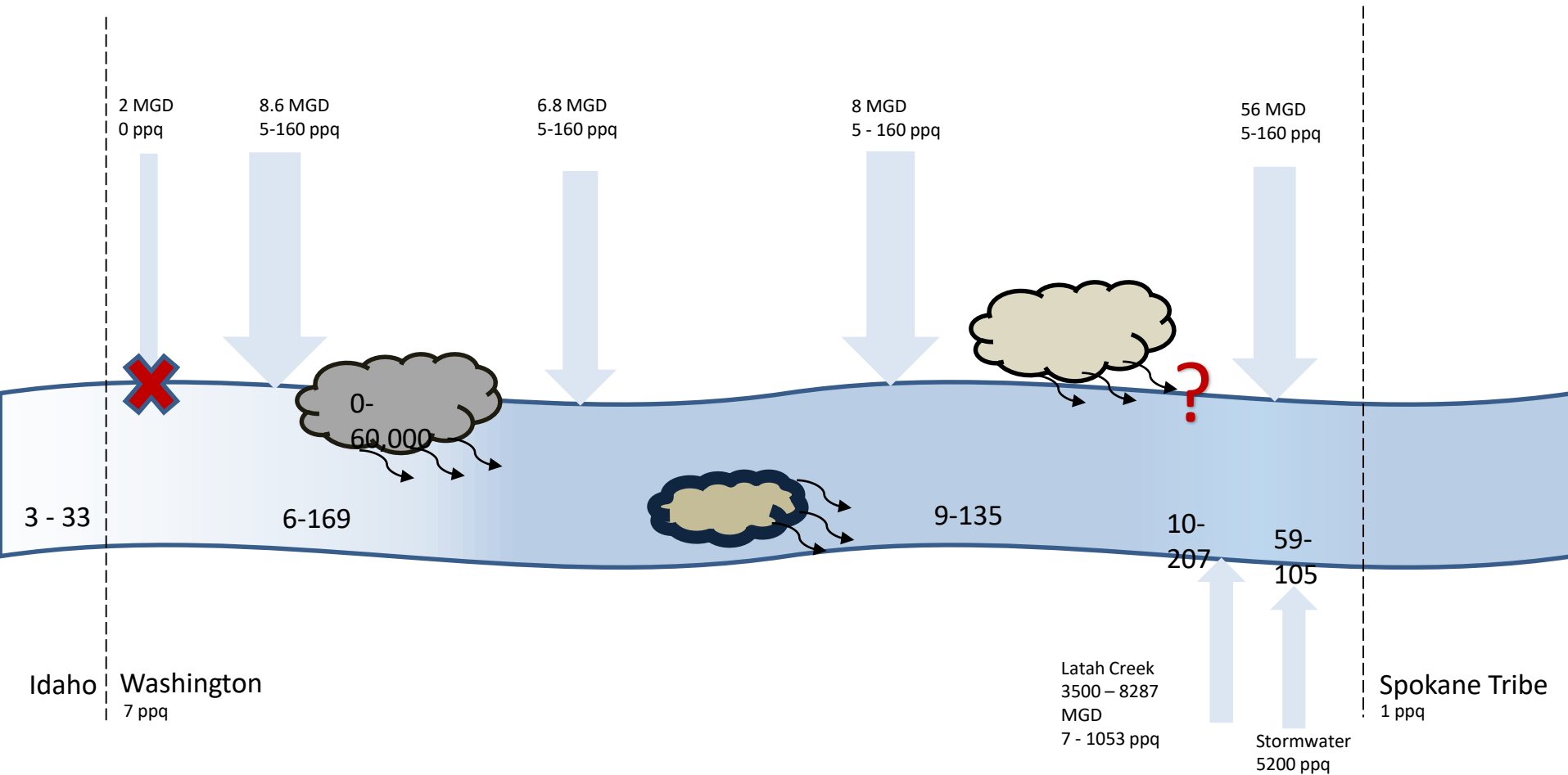
Compliance Schedule Principles from EPA Guidance

Ecology must make a reasonable finding that:

1. Compliance with the limitation is required “as soon as possible”
2. Schedule will lead to compliance with the effluent limitation



“Manage the end point” = compliance schedule



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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?

