

Mary Ann,

I asked three questions at the April 22nd meeting:

If a municipal discharger has effluent limits more stringent than the BADCTs, would antibacksliding be applied?

What pH and temperature was used to determine the summer and winter ammonia as N (NH<sub>3</sub>-N) BADCTs?

The test method for total residual chlorine has a level of detection (LOD) of 0.02 and a level of quantification (LOQ) of 0.06. Could an existing discharger ever claim to exceed 0.02 mg/l?

Upon further reflection I have additional questions regarding the BADCTs.

If a municipal discharger accepted the BADCTs, in lieu of an alternative technique analysis, are the BADCT-based effluent limits considered a significant lowering of water quality?

If the discharger accepts the BADCT-based limits and is upstream of an OSRW or EUW, does the discharger still have to complete an overall improvement project or pay a fee?

How will BADCTs be applied to mass limits?

For example, SDMC's WWTP currently has an average daily design flow of 12 mgd and a peak hourly design flow of 15 mgd. There is a Master Planning Document for LaPorte County that suggests that a fixed area within the Great Lakes Basin will be served by SDMC in the future. This would effectively triple out service area and require a doubling in size of the treatment facility. Our current limits are summarized below. Because we have flow maximization as part of our Long-Term Control Plan measures, mass limits are based on 15 mgd.

	Current AML, conc. (mg/l)	Current AML, mass (lb/day)
CBOD	5.0	626
TSS	6.0	751
NH <sub>3</sub> -N, summer	1.3	163
NH <sub>3</sub> -N, winter	1.4	175

If SDMC were to double the average daily design flow to 24 mgd, then the BADCT-based limits would be...

	BADCT AML, conc. (mg/l)	BADCT AML, mass (lb/day)
CBOD	10	2,002
TSS	12	2,402
NH3-N, summer	1.1	220
NH3-N, winter	1.6	320

However, antibacksliding would prevent all the concentration and mass limits from appearing in the permit. Therefore, the projected permit limits, after applying antibacksliding would be...

	New AML, conc. (mg/l)	New AML, mass (lb/day)
CBOD	3.2	626
TSS	3.8	751
NH3-N, summer	0.81	163
NH3-N, winter	0.87	175

It appears that after applying antibacksliding, the original mass limits are the drivers for BADCTs and not the proposed BADCT concentration limits.

SDMC's actual permit limits for total residual chlorine is 0.010 mg/l (AML) and 0.023 mg/l (DML), with compliance demonstrated if the daily maximum is less than the LOQ, 0.06 mg/l. If this type of language is included in a BADCT-based permit limit, then this is acceptable to SDMC.

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