

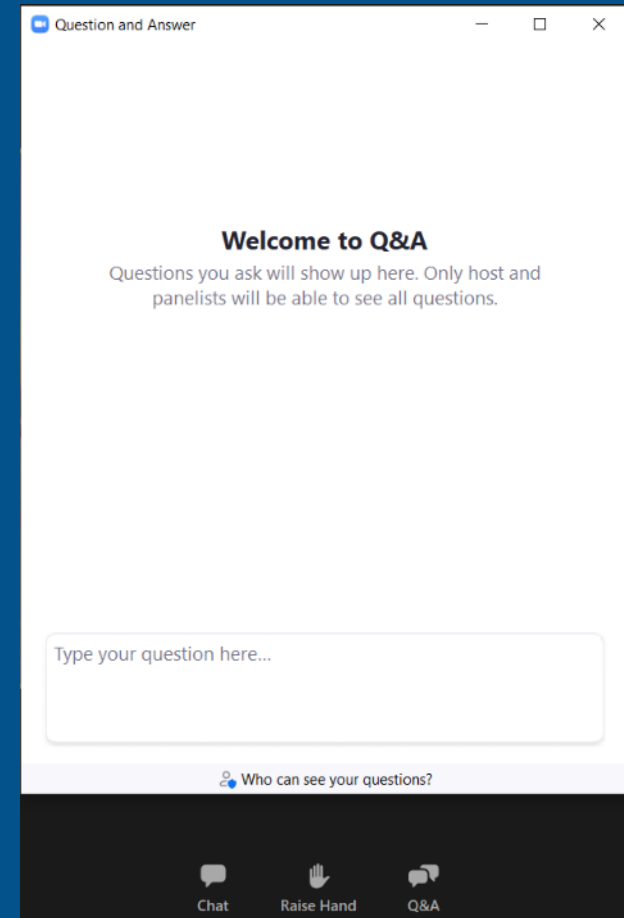


Nutrient Work Group

October 26, 2022

Welcome!

- This meeting has been converted to a webinar
- NWG members will be panelists
- Members of the public can raise their hand or use the Q&A feature to ask questions during the public comment portion of the meeting
- *9 raises your hand if you're on the phone
- State your name and affiliation before providing your comment



Unmute

Chat

Raise Hand

Q&A

Leave

Agenda

Meeting Goal: Discuss reasonable potential analysis process and the protection of downstream uses

Preliminaries

- Nutrient Work Group Roll Call

DEQ Updates

- Welcome New AMP Scientist, Kyle Milke
- Discussion Topics

AMP Process

- Flow Chart Review: Implementing Narrative Nutrient Standards in MPDES Permits
- Reasonable Potential Analysis Guidance Document
- Protection of Downstream Uses

Public Comment & Close of Meeting

- Public Comment
- Next Meeting & Meeting Summary

Roll Call

Nutrient Work Group Members

Interest Group	Representative	Substitute
Point Source Discharger: Large Municipal Systems (>1 MGD)	Louis Engels	
Point Source Discharger: Middle-Sized Mechanical Systems (<1 MGD)	Shannon Holmes	
Point Source Discharger: Small Municipal Systems with Lagoons	Rika Lashley	
Point Source Discharger: Non-POTW	Alan Olson	
Municipalities	Kelly Lynch	
Mining	Tammy Johnson	
Farming-Oriented Agriculture	Rachel Cone	
Livestock-Oriented Agriculture	Raylee Honeycutt	
Conservation Organization - Local	Kristin Gardner	
Conservation Organization – Regional	Sarah Zuzulock	
Conservation Organization – Statewide	David Brooks	
Environmental Advocacy Organization	Guy Alsentzer	
Water or Fishing-Based Recreation	Wade Fellin	
Federal Land Management Agencies	Andy Efta	None
Federal Regulatory Agencies	Tina Laidlaw	Erik Makus
State Land Management Agencies	Jeff Schmalenberg	
Water Quality Districts / County Planning Departments	Nick Banish	
Soil & Water Conservation Districts – West of the Continental Divide	Samantha Tappenbeck	
Soil & Water Conservation Districts – East of the Continental Divide	Dan Rostad	
Wastewater Engineering Firms	Scott Buecker	
Timber Industry	Julia Altemus	



DEQ Updates

DEQ Updates

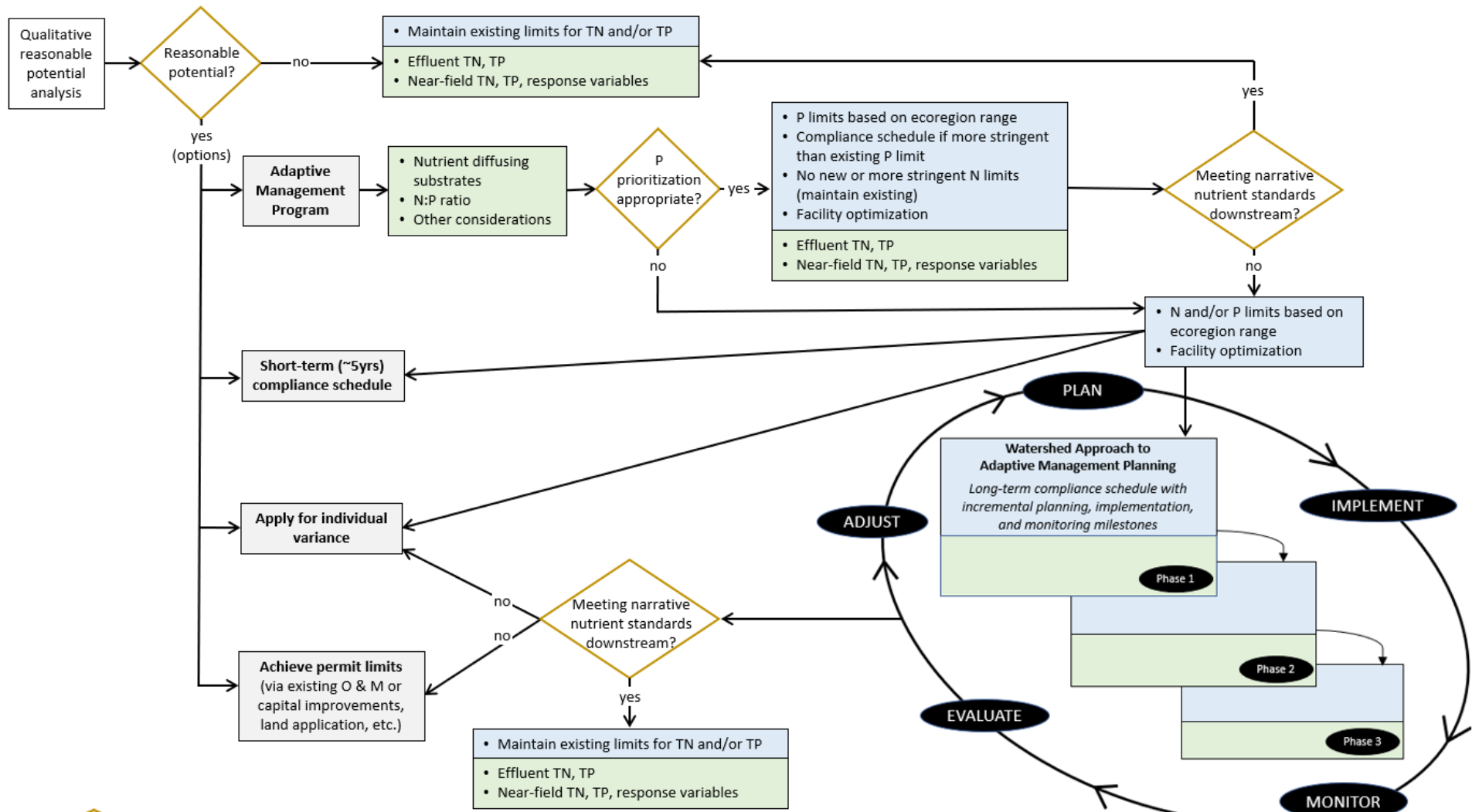
- Welcome Kyle Milke: AMP Scientist
- Staff Updates

Remaining Topics to Discuss

- AMP process
- TMDL – AMP interaction
- Addressing EPA's technical comments in August 2021 letter on response variables and thresholds
- Translation of the narrative for all CWA programs
- AMP – MPDES permit interaction
- Reasonable potential analysis
- Nutrient assessment method process
- Protection of downstream uses
- Revised guidance document
- Final rule language
- Case study



Implementing Narrative Nutrient Standards in MPDES Permits



- Decision
- Permit limits and conditions
- Monitoring requirements

TN = Total Nitrogen
TP = Total Phosphorus

Note: Timelines and milestones associated with each step will be specified in permits and Adaptive Management Plans, as approved by the Department.

PLAN

ADAPTIVE MANAGEMENT PLANNING

IMPLEMENTATION

- Inventory watershed nutrient sources →
- Engage partners committed to nutrient reductions →
- Identify nutrient reduction actions and estimate benefit →
- Enter contracts/agreements to fund →
- Identify timeline and implement nutrient reductions →
- Evaluate effectiveness

MONITORING

- Effluent TN, TP
- Near-field TN, TP, response variables
- Watershed TN, TP, loads (flow)

Phase 1

Ongoing planning and implementation

Ongoing monitoring

Phase 2

Ongoing planning and implementation

Ongoing monitoring

Phase 3

IMPLEMENT

ADJUST

EVALUATE

MONITOR

- Permit limits and conditions
- Monitoring requirements

TN = Total Nitrogen
 TP = Total Phosphorus



Reasonable Potential Analysis Process

Draft Guidance provided 10/19/2022

- Background
- RPA with Response Variables data
 - Propose use average of instream response variable data
 - Propose to use the 75th percentile of instream TN and TP concentrations
- RPA without Response Variable data
- Calculating TN and/or TP Water Quality-based Effluent Limits
 - Monthly average concentration equal to the ecoregional value
 - Monthly average load equal to the ecoregional value multiplied by the critical discharge flow



Protection of Downstream Uses

Downstream Use Protection

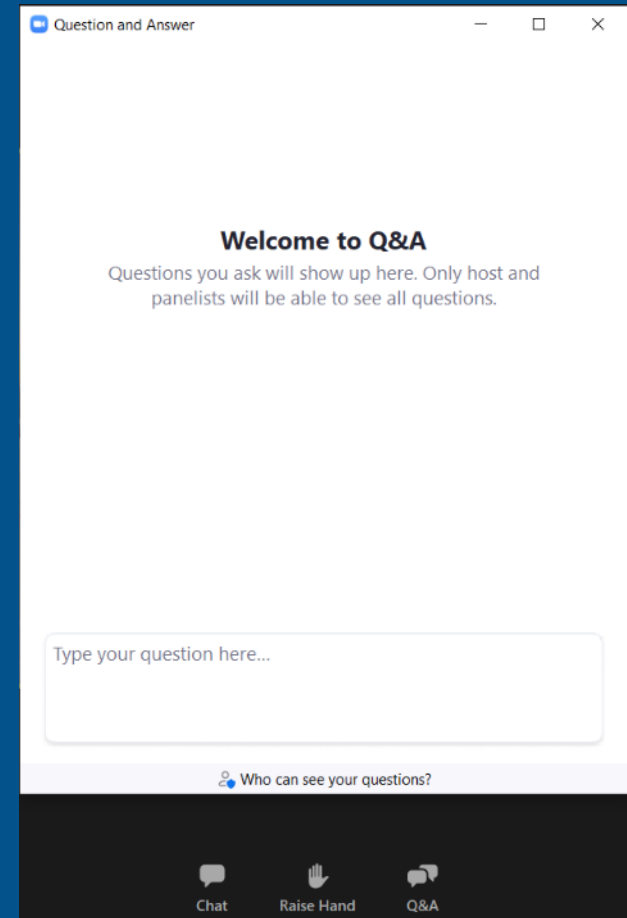
- *In General:* Narrative nutrient standards of the downstream reaches or other downstream waterbodies must continue to be maintained. Where possible, modeling methods will be utilized to determine the limitations required which provide for the attainment and maintenance of water quality standards of downstream waterbodies
- Considerations:
 - Is there a lake or reservoir downstream likely to be affected (=year-round limits)
 - Case-by-case analysis in an MPDES permit may be required
 - Effluent volume and strength
 - Receiving stream size/low-flow design flow
 - Non-target nutrient concentration in the near-field area relative to a far field location(s)—if data are available



PUBLIC COMMENT

Questions/ Comments

- Raise hand (*9 if on the phone) or type questions into the Q&A
- DEQ will unmute you if you wish to provide your comment orally
- If calling by phone, press*6 to unmute
- State your name and affiliation before providing your comment



Unmute

Chat

Raise Hand

Q&A

Leave



Next Meeting

Next Meetings

- Wednesday, November 9, 2022, 9 – 11 a.m. - Propose Cancelling Unless Members Would Like to Keep
- Wednesday, November 30, 2022, 9 – 11 a.m.

Meeting Summary

- Reasonable Potential Analysis Guidance Document is available for review on DEQ's website
- Downstream uses will be considered and protected during reasonable potential analysis and the adaptive management program

Thanks for Joining Us

Contact:
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To submit comments or questions



<https://deq.mt.gov/water/Councils>

