Multi-Discharger Variance Application Evaluation Checklist

Notice: This checklist is meant to be a tool to help Department of Natural Resources (DNR) staff review municipal and industrial multi-discharger variance (MDV) applications (Forms 3200-149 and 3200-150). Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law (ss. 19.31-19.39, Wis. Stats.).

Permittee Name

Village of Curtis

WPDES Permit Number	County
WI- 0 | 0 | 3 | 1 | 4 | 4 | 5	Clark

1. Did the point source apply for the MDV at the appropriate time?	(●) Yes ( ) No. *STOP- facility not eligible at this time.*	*See Questions 1-3.*
2. This operation is (check one):	( ) New or relocated outfall. *STOP- facility not eligible.* (●) Existing outfall	*See Questions 5-6.*
3. Is the point source is located in an MDV eligible area?	(●) Yes ( ) No. *STOP- facility not eligible.*	*Apply County information to Appendix H. Additional information provided in Q7 on municipal form & Q7-8 on industrial form.*
4. The secondary indicator score for the county (counties) the discharge is located is:	3	*See Appendices A-F. If the score is less than 2, stop; the facility is not eligible. See Q23 on municipal form & Q28 on industrial form.*
5. Is a major facility upgrade required to comply with phosphorus limits?	(●) Yes ( ) No. *STOP- facility not eligible.*	*See Q8 on municipal form/Q9 on industrial form.*
6. List the months where phosphorus limits cannot be achieved during the permit term:	☒ All ☒ Jan ☒ Apr ☒ Jul ☒ Oct ☒ Feb ☒ May ☒ Aug ☒ Nov ☒ Mar ☒ Jun ☒ Sep ☒ Dec	*Consider checking with limit calculator. If this does not match information in application, the application should be updated prior to approval.*

7. What is the current effluent level achievable?

Outfall Number(s)	Conc. (mg/L)	Method for calculation:	Does this concur with application?	
001	1.01	(●) 30-day P99 ( ) Other, specify:	( ) Yes (●) No, why not: Application used different data subset	*DNR staff should verify the effluent concentration value(s) provided. See Q11 on municipal form & Q12 on industrial form.*

8. What is the appropriate interim limitation(s) for the permit term?

0.6 mg/L as a monthly average, pursuant to s. 283.16(6)(a)2. Wis. Stats.
Target value = 0.2 mg/L

Provide Rationale:

Effluent total phosphorus data from the past three years (4/1/2020 - 3/31/2023, n=73) yields a 30-day p99 value of 1.01 mg/L. Treatment variability should be addressed in the coming permit term. A higher interim limit may be assigned if the provisions of s. 283.16(6)(am) are met.

Note: See description in Section 2.02 of the MDV implementation guidance. Interim limitations should reflect the "highest attainable condition" for the permittee in question pursuant to s. 283.16(7), Wis. Stat.

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9. *For Industries Only*- Where does the phosphorus in the effluent come from? (check all that apply)	☐ Process ☐ Additive Usage ☐ Water supply *Can intake credits be given or can the facility use an alternative water supply?* ○ Not feasible ○ Possibly, but further analysis needed ○ Not evaluated at this time	*See Q14-15 & 19 on industrial form. If the answer is "possibly" or "not evaluated", the schedule section of the MDV permit should contain a requirement to perform this analysis.*
10. Has this facility optimized?	◉ Yes ○ In progress ○ No	*See Q14 on municipal form & Q16 & 20 on industrial form. Facility must optimize and operate at an optimize treatment level (s. 283.16(6)(a), Wis. Stat.)If no will need compliance schedule.*
11. Has a facility plan/compliance alternative plan been completed for the facility?	◉ Yes ○ In progress ○ No	*See Q15 on municipal form & Q17 on industrial form.*
12. What is the projected cost for complying with phosphorus? Source:	$ 2,726,000.00 April 2018 capital costs for Hydrotech Discfilters.	*Facility must submit site-specific compliance costs. If cost projections are used from EIA, the permittee must certify that these costs are reasonable for the facility in question. See "projected compliance costs" in Section 2.02 of the MDV Implementation Guidance for details.*

Comments on planning efforts:

The final compliance alternatives plan dated Oct 2017 addressed all the potential compliance alternatives; tertiary treatments, alternative discharge locations, and watershed approaches. Of these alternatives, tertiary filtration and WQT were determined to be feasible and evaluated for cost estimates. For WQT, Curtiss would be looking to offset 310 lbs/yr with an effluent concentration of 1.0 mg/L. However, no practices or partners have been identified for WQT and tertiary filtration was determined to be less expensive than WQT. Disc filters continue to be amongst the most cost-effective treatment technologies to meet low phosphorus limits. Provided no other solutions have come to light, the 2017 and 2018 compliance cost estimate is still usable.

13. Are adaptive management and water quality trading viable?	○ Yes ◉ Perhaps. Additional analysis required. ○ No	*See Q18-21 on municipal form & Q22-25 on industrial form. If additional analyses required, the applicant may need to complete this analysis during the MDV permit term.*
14. Has the point source met the appropriate primary screener?	◉ Yes ○ No. *STOP- facility not eligible.*	*See Q4 of this form in addition to the "eligibility" guidance in Section 2.01 of the MDV Implementation Guidance.*

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Comments on economic demonstration:
The site-specific compliance cost estimate from 2018 shows capital costs are estimated for Hydrotech disc filters at $2,726,000 and O&M cost increases are estimated at $8,200 annually. The department originally considered inflation-adjusted compliance costs of $3,319,658.40 and O&M increases are $9,985.77 annually based on 2018 values. Projected sewer user rates amounted to 0.76% of the Curtiss Median Household Income, failing to meet the primary screener. In a September 2023 response from Curtiss DPW and consulting firm CBS Squared, it was contended that an entire new plant would be required due to groundwater separation distance issues, at a capital cost of $21,498,000. This upgrade would result in user sewer rates of $1,430 per year (2.68% of the Village's MHI), given the current proportion of rates paid by industrial users. In Clark County, sewer rates at 1% of MHI meet economic eligibility thresholds. This value meets the primary screener. Once current groundwater separation issues are resolved, the lower capital costs may need to be considered if the MDV is applied for in a future permit term.

15. What watershed option was selected?

- (●) County project option. *Complete Section 5.*
- ( ) Binding, written agreement with the DNR to construct a project or implement a watershed plan. *Complete Section 4.*
- ( ) Binding, written agreement with another person that is approved by the DNR to construct a project or implement a watershed plan. *Complete Section 4.*

Section 4. Watershed Plan Review

16. MDV Plan Number: *Note: This is for tracking purposes. Contact Statewide Phosphorus Implementation Coordinator for the plan number.*	_____
17. Did the point source complete Form 3200-148?	( ) Yes ( ) No
18. Is the project area in the same HUC 8 watershed as the point of discharge?	( ) Yes ( ) No. *STOP- Watershed plan must be updated.*
19. What is the annual offset required? *See Section 2.03 of the MDV implementation guidance. If this value is different from the offset target provided in form 3200-148, the watershed plan should be amended.*	_____
20. Does the plan ensure that the annual load is offset annually?	( ) Yes ( ) No. *STOP- Watershed plan must be updated.*

21. Are projects occurring on land owned/operated by a CAFO or within a permitted MS4 boundary?

- ( ) Yes. *Work with appropriate DNR staff to ensure projects are not working towards other permit compliance.*
- ( ) No.

22. Are other funding sources being used as part of the MDV watershed project?

- ( ) Yes. *Work with appropriate DNR staff to ensure that funding sources can be appropriately used in the plan area.*
- ( ) No.

23. Do you have any concerns about the watershed project? *Note: Coordinate with other DNR staff as appropriate.*	( ) Yes. *STOP- Watershed plan must be updated.* ( ) No.

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Comments:

Section 5. Payment to the County(ies)

24. At this time, the appropriate per pound payment is: $ 64.75

See "Payment Calculator" document at *\\central\water\WQWT_PROJECTS\WY_CW_Phosphorus\MDV*.

Section 6. Determination

Based on the available information, the MDV application is:

- (●) Approved
- ( ) Request for more information
- ( ) Denied

Additional Justification (if needed):

Certification

Preparer Name	Title
Matt Claucherty	Water Resources Management Specialist

Signature of Preparer	Date
Matt Claucherty	10/2/2024

A copy of this completed checklist should be saved in SWAMP, and a notification of the decision should be sent to the Phosphorus Implementation Coordinator.

Submit to Coordinator...

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