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

City of Pittsville

WPDES Permit Number	County
WI- 0 | 0 | 2 | 0 | 4 | 9 | 4	Wood

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:	6	*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?	
006	1.60	(●) 30-day P99 ( ) Other, specify:	( ) Yes (●) No, why not: Application used shorter data periods	*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:

The past three years of phosphorus effluent data results (5/1/2021 - 6/30/2024, n=332) vary between periods of highly effective treatment and periods of poor treatment (interim limit exceedances). As discussed in the optimization reports, operational challenges may be resolved and a compliance schedule is not likely required.

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:	$ 4,392,600.00 2018 site-specific cost estimate, adjusted for inflation	*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:

Pittsville submitted a Final Compliance Alternatives Plan, prepared by MSA Professional Services, Inc. which evaluates alternative compliance options for meeting a 0.075 mg/L WQBEL. Regionalization is evaluated- the nearest neighbor facility is 12 miles away. Land treatment options are evaluated but additional land to utilize for this is unavailable. Watershed offset options are evaluated, but deemed infeasible at the time. The current MDV application indicates that Pittsville is considering WQT through via the statewide Clearinghouse. A 9/3/2024 email from Pittsville indicates that specific projects have not been identified. Major facility upgrades to meet the WQBEL are provided with site specific cost estimates, adjusted from 2018. These include CoMag Ballasted Clarification, Hydrotech Disc Filters, and Actiflo high-rate filtration. Disc Filtration is the lowest cost option, and is used in the economic demonstration.

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.*

Comments on economic demonstration:

The Hydrotech Discfilter system is estimated in 2018 to be $3,131,000 in capital costs and $27,000 in annual O&M costs. This estimate is only slightly higher than the statewide estimate (EIA Addendum, Appendix G) of $3,069,000 with $61,000 O&M costs. With a CWFP loan, principle and interest payments for this upgrade would amount to $215,099.70. With O&M, the annual cost for the upgrade would be $242,099.70. With 99% as the domestic share, this cost distributed amongst 365 users comes to $656.09 annually. Regardless of current rates, this value alone is 1.12% of Pittsville's $58,500 MHI. The secondary indicator score for Wood county is 6, requiring sewer rate projections above 1% MHI for economic eligibility. Pittsville meets the primary screener.

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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.

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

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Additional Justification (if needed):

Certification		
Preparer Name Matt Claucherty	Title Water Resources Management Specialist	
Signature of Preparer Sign Clear		Date 9/6/2024

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