

SALs TO THE RESCUE

-- CASE STUDIES --

Jerald O. Thaler, P.E.

Fishbeck, Thompson, Carr & Huber, Inc.

Mark Houle

United Water

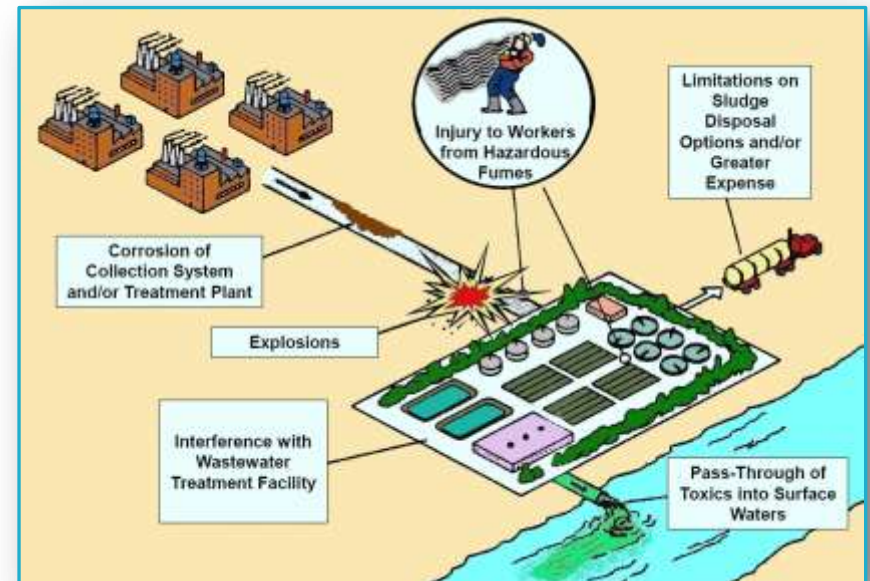


Annual IPP Seminar
September 18, 2014

Previously...

- ▶ 2012 – Local Limit Challenges in the Real World
 - Local Initiative Limits (LILs)
 - **Special Alternative Limits (SALs)**
 - Statewide Survey Results

Presentation available at www.mi-wea.org or e-mail jothaler@ftch.com



The Captive Loading Conundrum

- ▶ Traditional local limit approach
 - MAIL allocated uniformly to all SIUs
 - Applied equally, whether or not a SIU discharges the particular pollutant
- ▶ Many WWTPs now have available capacity due to lower flows and loadings
- ▶ Result is “captive loading” (on paper) that cannot be accessed



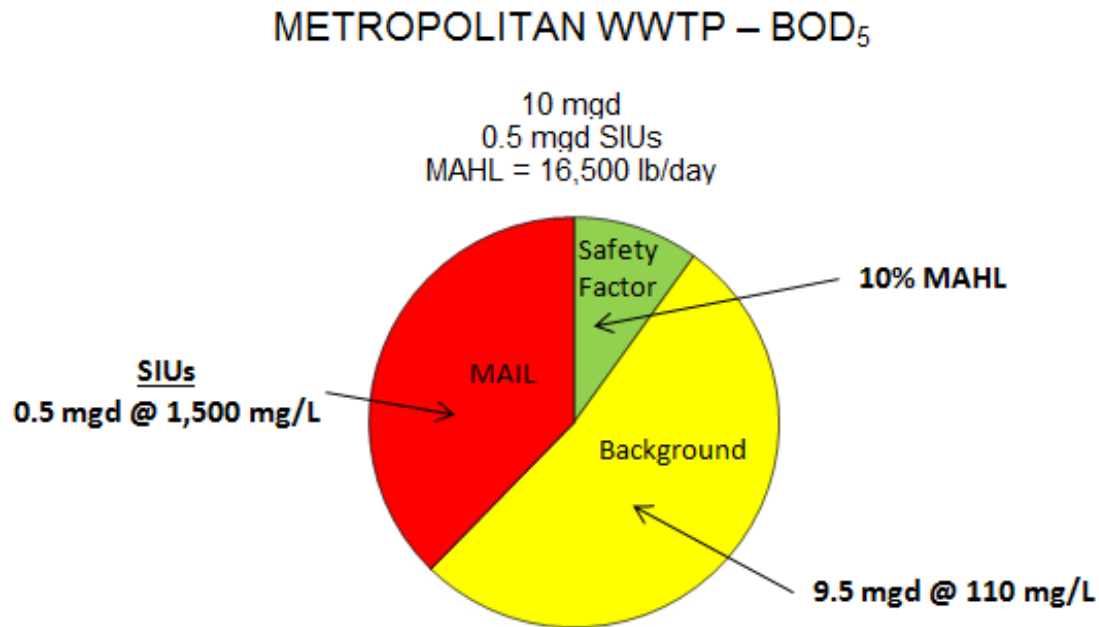
Special Alternative Limits (SALs)

- ▶ Extension of traditional local limit approach
 - Uniform allocation with reserve
 - Provides ultimate flexibility
 - Gaining in popularity across state
- ▶ Optional; applied at utility's discretion
- ▶ Release captive loading
 - Assist industries with special needs
 - Improve asset utilization
 - Promote local economy and protect jobs



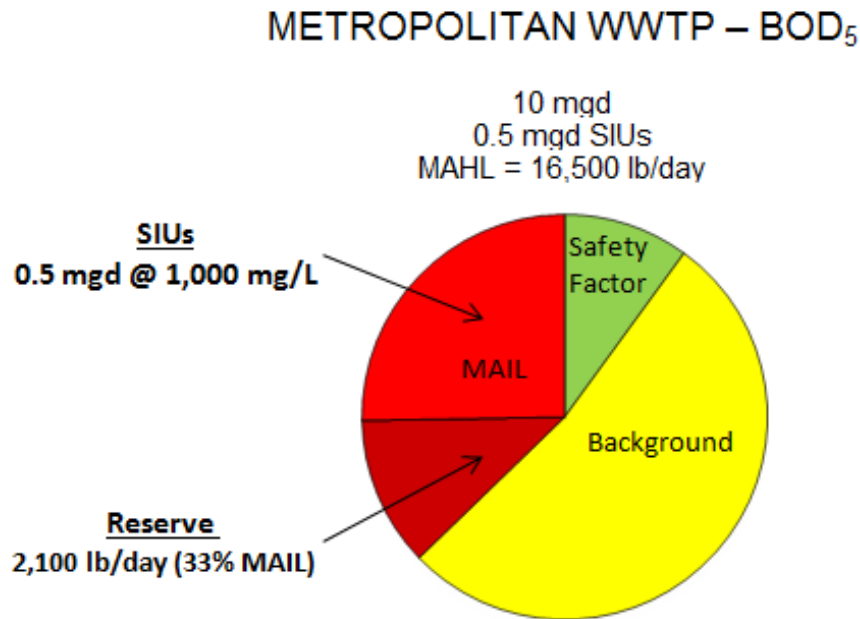
Traditional Local Limits

- ▶ MAHL = not-to-exceed mass to protect WWTP
- ▶ MAIL = portion of MAHL available to SIUs
- ▶ Allocate MAIL over SIU flow



SAL-Based Local Limits

- ▶ Reserve portion of MAIL
- ▶ Allocate remaining MAIL over total SIU flow
- ▶ When assign SAL, reserve is reduced



USEPA Position on SALs



- ▶ May select *any* allocation method producing enforceable local limits which:
 - Prevent pass-through and interference
 - Comply with prohibitions in federal regulations
- ▶ Subject to review by approval authority

MDEQ Position on SALs

Based on experience to date:

- ▶ Must have legal authority in SUO
- ▶ Must have approvable written procedures
- ▶ Must have up-to-date MAHLs/MAILs
- ▶ Constraints
 - Total influent mass cannot exceed MAHL
 - Total allocated mass cannot exceed MAIL
 - Assigned limit cannot exceed CSL, if applicable



Agenda

- ▶ Case Studies

- 1 - Southern Clinton County (compatible SAL)
- 2 - South Huron Valley (toxic SAL)

- ▶ Questions and Discussion

