

Multiple Discharger Variance

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Multiple Discharger Variance

- Time limited
- Applies to multiple dischargers
- 40 CFR 131.14(b)(2)(i)
- Public Process and EPA review (CWA 303 (C))
- Highest Attainable Effluent Conditions
 - Adaptive management approaches

Multiple Discharger Variance Applicability:

- Municipal Publicly Owned Treatment Works with a functional lagoon
- Variance on total ammonia nitrogen ~~(*E.coli*)~~
- 40 CFR 131.14(b)(2)(i), (§ 131.10(g))
 - CAFCom
 - Alternatives Analysis
 - EPA written Uses and Variances – Evaluating Substantial and Widespread Economic and Social Impacts
- Highest Attainable Effluent Conditions
- Timeframe 10 years

Cost Analysis for Compliance (CAFCCom)

- Written by MDNR permit writers at renewal
- Initial factor – High burden
- Used to justify substantial and widespread economic and social impacts
- Contact the municipality to go through variance process

MDV Framework

- Department Recommendations
- Appendix A – Highest Attainable Demonstration for a Wastewater Lagoon
- Appendix B – Multiple-Discharger Variance Application
 - Reasonable Alternatives Analysis
 - Natural Heritage Review Report
- Appendix C – Highest Attainable Demonstration for Recirculating Media Filters
- Appendix D – CAFCom Guidance
- Appendix E - ? – Site Specific Permits with completed MDV applications

Department Recommendations

- Explanation of how the MDV meets requirements of:
 - EPA
 - Missouri CWC
- Timeframe (suggested milestones)
 - Annual Reports, 5 year renewal
- Explanation of Highest Attainable Effluent Conditions
- Explanation of the CAFCom
- Additional Considerations

Appendix A - Highest Attainable Demonstration for a Wastewater Lagoon

- Establishes Benchmarks
- Detailed report of approach
- 2.3 mg/L – summer season
- 3.2 mg/L – winter season

Appendix B: MDV Application

- General Information
- Current MSOP permit information
- Financial information
 - CAFCom, EPA spreadsheet website
- Threatened and Endangered Species
 - Natural Heritage Review Report
- Alternative Effluent Control Analysis
 - Reasonable Alternatives Analysis
- Lagoon Design Profile
- Certification Page

Threatened and Endangered Species

- Justification using the Natural Heritage Review Report
- Instructions are in the fact sheet of application
- Initial inquiry sent to:

MDC Natural Heritage Review
Resource Science Division
P.O. Box 180
Jefferson City, MO 65102-0180
(Phone 573-522-4115 ext. 3182)

Alternatives Analysis

- To be completed by municipality using detailed fact sheets
- Land Application – written with CAFCom
- Regional Treatment
- Discharge Relocation
- Decentralization

Multiple Discharger Variance

- Minor Municipal
- Functional Lagoon
- Experience Substantial and Widespread Economic and Social Impact
- Total Ammonia Nitrogen
- Timeframe 10 years



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DEPARTMENT OF
NATURAL RESOURCES

Thank You



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