

Glen Geurts

From: Schmidt, James W - DNR <JamesW.Schmidt@wisconsin.gov>
Sent: Friday, May 22, 2015 9:11 AM
To: glen.geurts@hvmsd.org
Subject: Effluent limit memo for Heart of the Valley MSD
Attachments: HOVMSD WQBEL memo FINAL.doc

I just wanted to let you know that I've completed my evaluation of the effluent limit recommendations for the reissued permit. These recommendations will be passed on to Dick Sachs who will be drafting the new permit. Attached is an electronic copy of my evaluation.

The only changes I've recommended from the previous permit were to add limits based on the Lower Fox River TMDL. One of the issues that will likely come out of this relates to the TSS limits. Since HOV's flow has increased since the baseline period of the TMDL, the limits memo suggests some removal is needed for TSS after all since the TMDL recommended no TSS removal for point sources based on the baseline loads. An issue that may be available here is the same which is currently being considered by Green Bay, who is in the same situation. They are looking into a possible numerical trade of limits from the MS4 allocation to the treatment plant allocation. They're a bit ahead of you in the process though, as this permit was recently reissued (and HOV's permit has not started being drafted yet). With the networking going on among the Lower Fox municipalities, you may already be aware of this issue and hopefully that group will be looking into dealing with this situation as well. I guess we'll see what happens with TSS as Dick starts on the permit, but at least none of the parameters with limits not subject to the TMDL have proposed changes from the current permit.

If you have any questions on this, please let Dick or me know. Thanks - Jim

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