

NUTRIENT REGULATION IN ILLINOIS

Illinois Association of Wastewater
Agencies

IAWA Background

- Voice of wastewater agencies in Illinois
- Membership includes 54 agencies serving 8.6 million people, 75% of population with centralized wastewater treatment in Illinois
- Technical committees track topics affecting POTWs
- Nutrient committee has tracked and attended nutrient workgroup activities since the beginning

Illinois Nutrient Workgroup Participation

- Extensive academic work conducted and vetted - CFAR
- Flowing waters generally do not exhibit meaningful aquatic life impacts from nutrients
- Site-specific instances of streams identified with potential to benefit from nutrient standards
- IAWA supportive of development of scientifically derived standards for specific streams

Illinois Nutrient Loss Reduction Strategy Development

- IAWA participated as stakeholders
- IL WQ standards development put aside
- Emphasis on reductions to meet downstream (Gulf hypoxia) goals
- POTWs participating in reduction efforts with limited regulatory support / certainty

POTW Treatment Technology

Implications

- Nutrient technology limits are expensive, roughly double cost of wastewater treatment
- Costs range dramatically, median ~\$30/month/house, easily >10x in small communities, statewide totals \$50B cap
- Greenhouse gas emissions could be impacted on a large enough scale to require re-calibration of clean-air programs
- Biological nutrient removal more sustainable, less costly long-term, more useful to meet longer-term average (chronic) limits

IAWA Position on Nutrients

- Sound public policy dictates that heavy costs in regulatory work (TMDLs, UAAs), treatment technology, and secondary environmental impacts need to be justified with tangible benefits
- Cause and affect relationship must be clearly identifiable between nutrients and aquatic life
- Statewide blanket approach (ie, eco-region or algal growth threshold) overly simplistic, does not match previous Illinois-specific scientific (CFAR) work

IAWA Position on Nutrients (contd)

- Standards should be expressed so that effluent limits can be applied with the longest-term averaging available that supports stream use goals, in order to improve the viability of point source treatment technology
- Where standards are appropriate, a holistic approach is necessary, including trading, wetland sequestering, non-point source management, and consideration of affordable point-source technology (BNR)

Questions?

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IAWA Position on Nutrients (contd)

- Any rule must explicitly recognize implementation challenges, including affordability and compliance schedules
- Any new rule needs to delete the interim phosphorus standard and associated anti-degradation and anti-backsliding for POTWs caught under the interim standard