

# Wasteload Allocation



# Definition

- Waste Load Allocation: applies to sources defined as “point sources” under the NPDES regs
- Generally, if you are subject to NPDES, then you get a numeric WLA
- General permits as well as individual permits

# Examples

- WWTPs
  - Industrial dischargers
  - CAFOs
  - CSOs
  - MS4
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- We are interested in those that discharge the pollutant of concern

# What do I submit?

- For individual permit, each permit must have an individual WLA
  - Should be calculated based upon
    - permitted design flow
    - Permit limit
  - If you know the facility is going to expand, use the “expanded” load (avoids having to modify later)
  - At a minimum, we need name; permit number; WLA
- We don't approve permit limits

# Examples

TSS load (lbs/day)	Luna Pier WWTP	LaSalle MHP WWTP	Mason Consolidated Schools	MDOT Stormwater Permit	Land Use-related loads	Total TSS loads (lbs/day)
Existing load	87	17	5.8	40	1125	1275
Target load	58	17	5.8	40	351	472
Percent reduction	33%	0%	0%	0%	69%	63%

Luna Pier Beach TMDL, MDEQ

# Example

**Table 2 List of permittees ( loads in kg/day of phosphorus)**

<b>Facility Name</b>	<b>Permit #</b>	<b>WLA</b>
<b>Toussaint Creek:</b>		
Blue Moon Motel	N/A	.022
Eastwood School WWTP	2PT00026	.134
Graymont Dolime Inc	2IJ00063	.068
Martin Marietta Materials, Inc.	2IJ00040	.236
Otterbein-Portage Valley Retirement Village	2PS00005	.351
Rocky Ridge Elementary	2N/A00029	.019
Troy Energy, LLC	2IB00018	.142
Uretch International	2IR00008	.033
Village of Genoa WWTP	2PB00008	2.57
Village of Luckey STP	2PA00080	.057

# Stormwater

- Stormwater regulated under NPDES also gets a numeric WLA (2002 memo)
- However, it can be a “bulk” allocation, not to each outfall or permittee
- Most common method: divided by areal extent

Example: a watershed has 30% of the area covered under a MS4 permit. Run-off over the entire watershed is calculated to be 1000 lbs/day. WLA for MS4 would be 30% of that, or 300 lbs/day. LA would be 700 lbs/day.

# CSOs

- Yes, they are point sources
- They need to be accounted for in the WLA
- Generally, they are given a separate WLA, due to their special nature
- Can be based on flow regime, etc., as long as it is explained
- LTCP can be the “implementing” tool

# CAFOs

- We are concerned with the Federal definition
- Clearly state what the CAFOs are, as they fall in the WLA section
- Non-CAFOs fall into the LA section
- We are talking about the animal handling, production, waste storage, etc. areas
- Usually not a big issue since IDEM permits are non-discharge; WLA = 0

# What about the fields?

- Manure applied in accordance with a nutrient management plan is agricultural stormwater, thus not subject to NPDES
- This makes it LA



# One last source...

- Straight pipe discharge from a septic is a point source (MN TMDL case)
- Includes hooking into tiles drains, etc.
- Since they are illegal, WLA = 0
- Don't include straight pipe discharge when describing "failing septic"



# What we don't approve...

- Take care with permit limits (we don't approve permit limits in the TMDL)
- Take care with permit schedules (we don't approve permit schedules in the TMDL)
- These apply to storm water as well (i.e., we don't approve the BMPs in the TMDL)

# Final thoughts

- We need a number for all permitted facilities
  - Some individual numbers
  - Some “lump” numbers
- Assume compliance with a permit
- Don't assign loads to illegal sources (SSOs, straight pipes, permit exceedences)
- **No number means a 0 allocation**