



# EXAMPLE PIP

## Pre-season Implementation Plan

### Annual Compliance Planning Report

Minnesota River Basin General Phosphorus Permit – Phase I

Date Received		
Month	Day	Year

Note: This is an example of a filled-out PIP. Be sure to customize the PIP for your individual facility. The purpose of a PIP is to ensure that a Permittee has thought about what their phosphorus discharge will be for the upcoming year and how they intend to meet their 5-month mass phosphorus limit (i.e. will they trade or not?). Be sure to explain how you came up with your estimated phosphorus discharge for the year covered by this PIP and how it relates to the actual discharge data from the previous two years.

Facilities which are listed in Appendix B (Permittees) of the Minnesota River Basin General Phosphorus Permit – Phase I (Permit) are required to submit a Pre-season Implementation Plan (PIP) unless they have obtained an exclusion from their 5-Month Mass Phosphorus Limit as allowed by Chapter 5, item 2 of the Permit. Permittees without exclusion must submit a PIP by April 30, 2008, and by each April 30<sup>th</sup> thereafter. In addition, if a Permittee is trading phosphorus (i.e. buying or selling Jordan Trading Units) in 2006, the Permittee shall submit a PIP by April 30<sup>th</sup> of 2006 and if the Permittee is trading in 2007, the Permittee shall submit a PIP by April 30<sup>th</sup> of 2007. The PIP must include the information requested in this form. The terms used in this form have the same meaning and definitions as used in the Permit. Submit the PIP and any attachments to: WQ Reports Submittal Center, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, MN 55155-4194.

#### General Information

Year Covered by PIP (use one form per year): ☐ 2006 ☒ 2007 ☐ 2008 ☐ 2009 ☐ 2010

Permittee Name: City of Blue Water Wastewater Treatment Facility MN River Basin Permit No.: MNG420999

#### Facility Information

Provide the information requested below regarding the Permittee's facility for the upcoming May 1<sup>st</sup> – September 30<sup>th</sup> period of the year covered by this report.

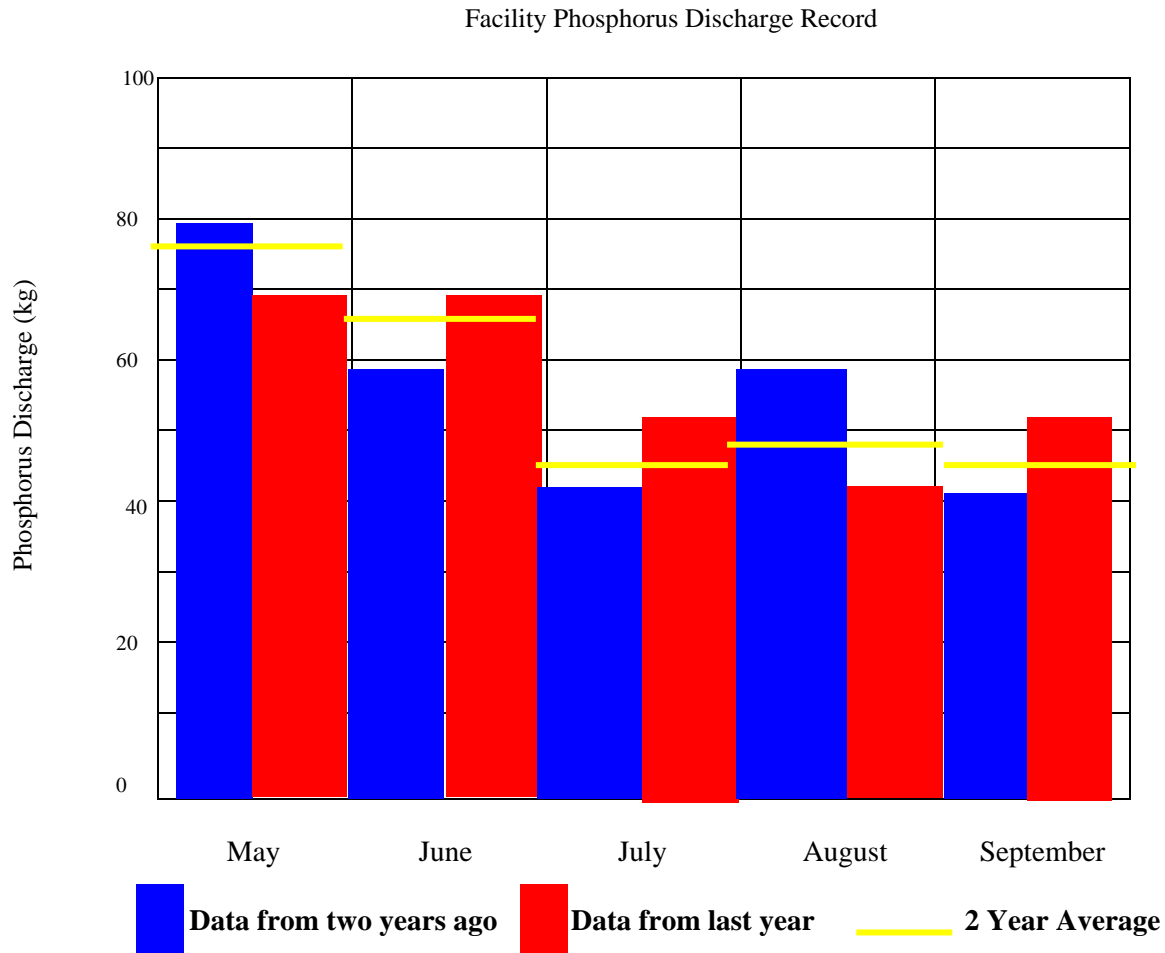
1. Provide a description of how the Permittee intends to meet its 5-Month Mass Phosphorus Limit: The City's WWTF will meet its phosphorus limit by reducing its total phosphorus discharge as much as possible on its own and trading (i.e. buying Jordan Trading Units) to make up the difference. See the attached Legal Contract to Trade for details regarding our phosphorus trade.

2. Provide the Permittee's actual May-September phosphorus discharge data for the previous two years:

Two Years Ago		One Year Ago		Two Year Average	
Month	Phosphorus Discharged (kg)	Month	Phosphorus Discharged (kg)	Month	Phosphorus Discharged (kg)
May	80	May	70	May	75
June	60	June	70	June	65
July	40	July	50	July	45
August	60	August	40	August	50
September	40	September	50	September	45
Total	280	Total	280	Total	280

**EXAMPLE PIP**  
**Pre-season Implementation Plan**  
**Annual Compliance Planning Report**  
*Minnesota River Basin General Phosphorus Permit – Phase I*

3. Using the data from the table in item 2 above, graph the Permittees previous two years mass loadings by month and identify its seasonal (May-September) mean effluent total phosphorus loading.



**EXAMPLE PIP**  
**Pre-season Implementation Plan**  
**Annual Compliance Planning Report**

*Minnesota River Basin General Phosphorus Permit – Phase I*

4. Provide an estimate of the Permittee's May-September total phosphorus discharge for the year covered by this PIP: 280 kilograms. *Note: This facility used their average of the last two years as their estimate for the upcoming year because they have no change in population or industries in town. If there was a change to their influent flow and/or phosphorus concentration, they would need to take this into account in this estimate.*
5. Will the Permittee be trading phosphorus (i.e. buying or selling Jordan Trading Units) during the year covered by this report: ☒ Yes ☐ No
6. If the answer to question number 5 is yes; indicate whether the Permittee will be a buyer or seller and the amount of phosphorus that it will trade: The City will be a buyer of Jordan Trading Units
7. Attach a copy of each Legal Contract to Trade that the Permittee has already entered into for the upcoming May through September period. *Note: The city made one trade prior to submittal of this PIP and attached it to the PIP.*
8. Is the Permittee a member of a Trade Association for the year covered by this report? ☐ Yes ☒ No  
If yes, be sure to attach a copy of your Trade Association Internal Legal Contract to trade to this PIP.

**Certification and Signature**

I certify under penalty of law that this document and any attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\_\_\_\_\_  
*Signature (Principal Executive Officer)*

Joe Smith

\_\_\_\_\_  
*Printed name of person signing*

March 31, 2007

\_\_\_\_\_  
*Date*

Mayor

\_\_\_\_\_  
*Title*