

## ***To our municipal friends in Iowa,***

Many of you in the municipal sector heard from FOX during the last year or so as the IDNR and then the state legislature considered the implementation of new water quality standards. At FOX, we were concerned that these new standards would result in the application of more stringent discharge limits while yielding very little water quality improvement for Iowa. While we lobbied hard, we lost that argument and now are faced with dealing with the outcome of the changes.

So ***what is likely to happen now?*** If your community has a wastewater treatment facility that discharges to a stream affected by the new water quality standards, then the IDNR has already or is going to perform a field survey of that receiving stream. Based on the data they collect, they will then make a determination as to the “use attainability”, the uses they believe the stream can or should support – such as wading, swimming, boating, fishing, etc.

Based on the “***use attainability***” of the stream, they will then determine what discharge criteria will be applied to your treatment plant’s effluent in order to allow the stream to achieve the water quality needed for those uses to exist. These criteria will ultimately be included in a new NPDES permit issued to your community. If past experience is any guide, the permit is likely to include a compliance schedule. The first item will be a requirement for submittal of an engineering report detailing how and when the plant will achieve the new discharge limits.

For some of you, it may only mean a little more attention paid to your operating procedures to ensure maximum ammonia removal in your existing plant. For others it may mean adding facilities to achieve the necessary ammonia removal. Others may need to re-activate abandoned disinfection facilities or install new facilities to achieve fecal coliform reductions.

So ***what should you do*** about all this? Our advice for now is to continue to pay attention to the process as it moves forward. Perhaps you will want to consider appealing the new stream classification if you believe it is not adequately supported. Remember that the re-classification is likely to be based on a single field survey conducted at a given point in time. The agency is going to attempt to choose a representative time to perform the survey, however, they are no more infallible than the rest of us and mistakes can be made. Since the program is so new, there is little or no experience with how the IDNR is going to interpret their field findings in order to determine proper stream classifications or how likely an appeal is to be successful.

If you take a more ***pragmatic approach*** and feel that you are unlikely to have an impact on the classification process, then you need only await the determination of the new classification and determine what, if any, plant modifications may be required to comply with the new classification. It is important that you do not ignore or overlook the new permit when issued; address any compliance schedules within the times allowed.

The only ***other advice*** we might offer is that you may want to start collecting some background data regarding existing levels of ammonia nitrogen and fecal coliform in your effluent and perhaps setting some funds aside to address these issues.

On the ***funding*** side, however, there are both planning and construction loans available through the state revolving loan fund. There is also a new grant program to assist small (less than 3,000 population) low-income (50% or greater LMI rating) communities.

For your information, the following link (<http://www.foxeng.com/docs/WQSCitiesGrantElegibility.pdf>) will take you to a listing of the municipal wastewater facilities in the state identified by IDNR as possibly being impacted by the new Water Quality Standards. The listing shows the facility name, type of treatment and possible impacts (ammonia, elimination of the protected flow in determining effluent limits, and disinfection requirements). The listing also shows the city’s current LMI rating according to the State Department of Economic Development. Where both population and LMI rating indicate probable grant eligibility, then the grant percentage available under the new grant program is also shown. We prepared this listing from data provided by the two state agencies.

If you have questions or desire further information, please don’t hesitate to contact us. The author of this article, Jim Merideth can be reached at 515/233-0000 or 800/433-3469 or e-mail him at [jam@foxeng.com](mailto:jam@foxeng.com).