

Municipal/Industrial Wastewater Treatment Facilities Work Group

Draft Framework for Allocations for Mainstem Lower Boise River Phosphorus TMDL

July 25, 2013

Key Elements

- Phased approach from current TP concentrations/loads to ultimate endpoint, with technology-based milestones (such as BPR and ~0.3 to 0.4 mg/L as intermediate phases)
- Employ mass balance and AQUATOX models to evaluate allocation scenarios not only for periphyton target in the Boise River but also for 0.07 mg/L target at mouth (e.g., account for TP uptake by algae that mass balance model does not account for), consistent with DEQ chart
- Include river flow-tiered allocations
- Quantify effluent variability at lower TP levels in effluents (WERF study) and explicitly address WLA duration issues numerically in the TMDL (seasonal, monthly, weekly, etc.)
- Trading language in this TMDL needs to be more specific than standard boiler plate paragraphs, not identifying specific trades or individual trade requirements, but recognizing the trading bullets below:
 - AQUATOX model also addresses localized impacts questions
 - “Reasonable assurance” is expected to be reinforced by trading opportunities in this watershed
 - Include trading evaluation in an Appendix (similar to SR-HC TMDL) and compare 0.07 and ~0.3-0.4 mg/L WLAs with and without trading, including relative timing and effectiveness for meeting the target at Parma, and comparative cost and sustainability evaluations
 - LA for agriculture does not make trading infeasible (e.g., percent reduction so high that credits cannot be generated with likely BMPs specific to this watershed)
 - Credits can be generated immediately with site/field specific BMPs that exceed reduction allocations (e.g., do not need to wait for overall watershed or sub-watershed to meet goal)

Timing

- More detailed allocation proposal to be presented at August TP TMDL TAC
- Other details such as economic and sustainability evaluations soon thereafter