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| **Implementation**  **Tool or Approach** | **Description** | **Environmentally**  **Meaningful** | **Cost Effective** | **State Authority** | **Comments** |
| Water quality-based effluent limit (WQBEL) | A numeric effluent concentration limit included in an NPDES permit when the source has the reasonable potential to exceed a water quality criterion | Prevents the discharge of a pollutant at levels that may impair beneficial uses. In some cases the contribution from the point source is so small relative to other contributions that remove of the point source load will not provide a significant or meaningful benefit to beneficial uses. | In some cases, particularly when additional treatment is required, could lead to expensive removal of a small pollutant load by an NPDES source, while loading from other sources may be less expensive to reduce | Existing, no proposed changes | The CWA regulates point sources through the NPDES permit program, but does not regulate nonpoint sources. Nonpoint sources may be given load allocations in a TMDL. |
| Intake credit | A tool that exempts a source from removing pollutants from their effluent that are contained in their intake water as long as the facility does not increase either the mass or concentration of the pollutant. | This provision does not result in an environmental benefit or impact. It is primarily an equity issue. | This provision is cost effective for the point source because it allows them to forgo the cost of removing pollutants that they did not contribute. | DEQ will propose a new rule authorizing intake credits. | DEQ expects there will be very few permittees that will qualify to use this provision. |
| Compliance schedule | A schedule of actions included in an NPDES permit leading to compliance with permit limits or other requirements | A facility may need time to install technology improvements or implement pollution reduction programs before they can achieve their permit limits. This tool allows DEQ to require that milestones toward achieving compliance be met. | The compliance schedule allows an existing source time to complete planning, financing and construction of improvements over the specified timeframe. | Existing, voluntarily on hold pending litigation settlement | This is a tool DEQ, other states and EPA have used for many years. DEQ is currently developing guidance to improve our process. |
| Variances | A temporary change to the water quality standard(s) for a water body based on one of 6 reasons | A variance could provide a permitted source relief in certain situations where attainment of the standard by that source would not provide meaningful environmental benefit. | A variance could be used to provide a permitted source relief in certain situations where attainment of the standard by that source would not be cost effective. | Existing , DEQ will propose revisions intended to clarify and streamline the process to obtain a variance. | Substantial and widespread economic impact is one reason a variance may be granted. EPA must approve variances. |
| Intake concentration allowance | This tool will provide relief to non-contact cooling water sources that do not add a pollutant, but that concentrate pollutants in their intake water. If the ambient river concentration is above the criterion, these sources must meet the criteria ‘end-of-pipe.’ | The intake concentration allowance could provide specified permitted sources relief where attainment of the standard in the effluent of that source would be costly but would not provide meaningful environmental benefit. | The intake concentration allowance could provide specified permitted sources relief where attainment of the standard in the effluent of that source would be costly but would not provide meaningful environmental benefit. | Will be adopted by rule and submitted to EPA as a multiple discharger variance. |  |
| Offsets or trading to meet WQBEL | Allows a permittee to reduce loading from an upstream source in order to create the assimilative capacity they need to meet water quality standards. | Provides more options for reducing toxic pollutants from multiple sources. | Allows a permittee to achieve toxics reductions more cost effectively if there are other sources nearby that can be reduced at less expense. | No authorizing rule language is needed; this is possible under existing standards. |  |
| Source reduction | Reducing pollutants generated or entering a treatment facility by finding ways to reduce them before they become waste; e.g. recycling, reduced use or substitution of raw materials. For municipalities it could include education or collection programs or enhanced pre-treatment by dischargers to the POTW. | Reducing toxics at the source can provide multiple environmental and safety benefits. | Source reduction is often found to be more cost effective that waste treatment. | No authorizing rule language is needed; this is possible under existing standards. |  |
| Use attainability analysis | A process to set appropriate use goals for the water body. Demonstrate that a use is not attainable for one of 6 reasons, remove that use and determine what use is attainable. | Getting the uses/goals for the water body right can be the first step in making real environmental progress. | By setting appropriate and attainable use goals, resources will be allocated where they are more likely to accomplish the desired environmental results. | Existing, no new rule language is needed. | This is a revision to the standards for a water body rather than a standards tool applied to a specific permittee. |
| Site specific criterion | A process to set appropriate criteria for the water body. Demonstrate that a water body or basin-specific criterion is protective of the designated use. | Getting the criteria right can be the first step in making real environmental progress through regulatory and non-regulatory programs. | By setting appropriate criteria, resources will be allocated where they are more likely to accomplish the desired environmental success. | Existing, no new rule language is needed. | This is a revision to the standards for a water body rather than a standards tool applied to a specific permittee. |