



**DNR Developing Draft Ammonia Strategy
August 2017**

DNR is currently evaluating existing compliance strategies/flexibilities in its permitting, enforcement and variance regulatory frameworks that could be used to facilitate implementation of the current ammonia criteria. AMCA has provided DNR with several approaches to increase implementation flexibility, such as use of median, 50th percentile or some other pH and temperature values other than 90th or 95th percentile values to determine permit limits. The criteria are highly pH and temperature dependent, and moderation of the pH/temperature used in permitting assumptions would make a substantial difference. Additionally, seasonal limits beyond winter/summer may help some dischargers. This is routinely done in some states to take advantage of temperature (and/or pH) changes.

Alternatively, believing that a well-defined problem is half-solved, AMCA proposed putting dischargers into a BMP/Optimization protocol with the Department, which would, over the course of a few years, allow the community to evaluate attainable discharge improvements and the best options for future compliance. It would also help communities to recalculate the criteria where sensitive organisms are not present (maybe, for example, dischargers to intermittent and/or losing streams).

We will continue to monitor DNR's development of their ammonia strategy.