

CHAPTER 2.6 - Compounds Present due to Water Supplies

The purpose of this chapter is to clarify the WDNR's position in regards to noncontact cooling water discharges that fail WET tests due to substances that come from the public water supply from which the source water originates.

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Section NR 106.10 (Wis. Adm. Code) exempts dischargers of noncontact cooling water from meeting limitations for substances under certain conditions. Specifically, the code states that "*the Department may not impose water quality based effluent limitations for toxic and organoleptic substances for...noncontact cooling waters which do not contain additives...Only the additives to noncontact cooling waters shall be examined under this chapter for the establishment of water quality based effluent limitations. For purposes of this exclusion, the term "additives" are those compounds intentionally introduced by the discharger, but do not include addition of compounds at a rate and quantity necessary to provide a safe drinking water supply, or the addition of substances in similar type and amount to those substances typically added to a public drinking water supply....*"

Because of this language, WET limitations and monitoring are usually not imposed for noncontact cooling water discharges which contain no additives. The exclusions allowed in s. NR 106.10 are limited to discharges consisting solely of noncontact cooling waters and are not applicable to any discharge which contains process or contact cooling water. Any discharger who believes that failures of permit-required toxicity tests are due to substances present only because of the water supply should submit data from parallel tests of adjusted and unadjusted effluent which demonstrates that to be the case. These parallel tests should be similar in every way other than the adjustment being demonstrated (i.e., with the same dilutions and under the same test conditions). Controls should be conducted that show the adjustment itself has not caused toxicity. For example, if it is believed that chlorine from the water supply is causing WET failures, side-by-side testing with dechlorinated samples could be done to demonstrate chlorine was the cause. Following the review of such data, the WDNR will make a case-by-case determination on the effects of pollutants in the water supply and the likelihood for a permittee to achieve compliance.