



Bureau of Clean Water

TMDL Plans


MS4 Workshops – Pollutant Reduction
and TMDL Stormwater Plans

Fall 2016

Tom Wolf, Governor John Quigley, Acting Secretary


Training Goals

- Understand the differences between a Pollutant Reduction Plan and a TMDL Plan
- Clarify how a PRP and a TMDL Plan can be combined into a single plan



What is a TMDL?

- A Total Maximum Daily Load (TMDL) is the amount of pollutant loading that a waterbody can assimilate and meet our water quality standards.
- The TMDL process is a planning tool to develop pollution reduction goals that will improve impaired waters to meet water quality standards.



How You Gonna Know?

How do I know if I have a TMDL requirement?

Look at the "MS4 Requirements Table"


See DEP Home/Businesses/Bureau of Clean Water/Water/Stormwater Management/Municipal Stormwater, then see "Program Updates"



Components of a TMDL


TMDL = LA + WLA + MOS

- LA = Load Allocation (non-point sources; implemented through restoration activities)
- WLA = Waste Load Allocation (point sources; implemented through NPDES permits)
- MOS = Margin of Safety (uncertainty)




MS4 TMDL Plan Required When...

- MS4 WLA, specific or bulk,
and
- For nutrients and/or sediment



Permit Considerations


- A TMDL requirement means an IP not a GP
- Any TMDL = No waiver
- TMDL Plan is due with the IP application



Differences: PRP and TMDL Plan

1. Existing Loads:


- TMDL will provide the existing load or the basis for determining the existing load (may require user to provide land use distribution)
- PRP requires determination of existing loads



Differences: PRP and TMDL Plan

2. Load Reduction Targets


- TMDL prescribes a load reduction determined to be that needed to meet WQS
 - TMDL Plan must show that ultimate reduction goal can be met along with progress to be made this permit term
- PRP requires a specific percentage load reduction to be made this permit term



Differences: PRP and TMDL Plan

3. TMDLs may require interpretation


- "Existing conditions" not necessarily current existing conditions
- Loading included/excluded
 - Land not covered under authority of permit included
 - CSOs may not be excluded
 - Mapped sewershed not included



Differences: PRP and TMDL Plan


4. Time to meet TMDL goals not specified

- Wide range of reduction requirements between TMDLs
- More time needed to meet greater reduction goals



Same: PRP and TMDL Plan

- Planning Area
- Pollutants of concern
- Cost-effective BMP options



Combined Plan Commitments

Must satisfy the requirements for both PRP and TMDL:

- PRP:
 - Chesapeake Bay: 10% sediment, and/or
 - Impaired Waters PRP: sediment and/or nutrients depending on local impairment
- TMDL:
 - General plan for ultimate load reduction
 - Permit term load reduction



Level of Planning Detail-Both Plans

- Permit term BMPs must be located
- Status/schedule of planning & design must demonstrate that compliance is feasible



Realistic to accept conceptual designs - planning-level information,
 - location, loads, estimates, schedule, and show you have resources to implement.

Public Participation


- Same PP actions required as in a PRP
- Documentation submitted with the plan, same as a PRP



45-day notice -
 This means for those due in Sept, it's actually due to be done early August.

Exercise: Q&A

We will now test your understanding!



Summary

- Differences between a Pollutant Reduction Plan and a TMDL Plan
- How a PRP and a TMDL Plan can be combined into a single plan.

