

# TMDL Implementation Planning for MS4s

*The DNR Perspective*

- MS4 Permit Requirements
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- Other Stuff



# MS4 Permit Requirements

MS4 GP – Appendix B: Milwaukee River TMDL – B.4.2.c.

**(1)** Recommendations and options for storm water control measures that will be considered to reduce the discharge of each pollutant of concern. At a minimum, the following shall be evaluated: all post-construction BMPs for which the Department has a technical standard, optimizing or retrofitting all existing public and private storm water control practices, regional practices, optimization or improvements to existing BMPs, incorporation of storm water control for all road reconstruction projects, more restrictive post-construction ordinances, updated development and redevelopment standards.

**(2)** A proposed schedule for implementation of the alternatives identified under section B.4.2.c(1). The proposed schedule may extend beyond the expiration date of this permit. The schedule should aim to achieve, to the maximum extent practicable, a level of reduction that achieves at least 20% of the remaining reduction needed beyond baseline to achieve full compliance in TSS and a level of reduction that achieves at least 10% of the remaining reduction needed beyond baseline to achieve full compliance in TP over the next permit term. The reductions can be achieved utilizing an averaged reduction calculated from individual reductions achieved in one or multiple reachsheds and spanning the entire MS4 area impacted by a TMDL.

**Note:** The reductions stipulated under B.4.2.c(2) are interim compliance targets set as a planning target for the next permit term. Future permit reduction targets may taper off or vary between municipalities based on individual plans as it is expected that municipalities will rely more on reductions obtained through redevelopment.

**(3)** A cost effectiveness analysis for implementation of the recommendations and options identified under section B.4.2.c(1).

# Common Implementation Plan Issues

1. No specific practice and/or practice locations identified
2. No schedule for implementation proposed
3. Plans only commit to do more planning/evaluating
4. Implementation plan not from the municipality



# DNR Expectations



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## TMDL Implementation for TSS & TP Washington County: March 2022 Municipal Separate Storm Sewer System (MS4) Permit Wisconsin Pollutant Discharge Elimination System (WPDES)

Plan needs to be submitted by the municipality

The Wisconsin Department of Natural Resource under NR216 issued a general permit to Washington County requiring the County develop, maintain and implement a Storm Water Management Program. Included in the general permit are requirements for the County to evaluate its compliance with the TMDL for Total Suspended Solids (TSS) and Total Phosphorus (TP) WLAs in the Milwaukee River Watershed (Appendix B).

In accordance with Section B.4.1., a tabular summary by reachshed was provided to the Department as part of the County's Annual Report (due March 31, 2022) indicating the level of reduction currently being achieved by the County. In total, the County is less than 2% from achieving full compliance with TSS and less than 20% away from full compliance with TP waste load allocations identified in the Milwaukee River Watershed TMDL Report (March 19, 2018). The table below identifies compliance level by reachshed for TSS and TP.

Reachshed	Total Suspended Solids (TSS)		Total Phosphorus (TP)	
	Compliant	Not-Compliant	Compliant	Not-Compliant
MI-02		X		X
MI-04		X		X
MI-06	Y			X
MI-20		X		X
MI-18	Y		Y	
MI-22	Y		Y	
MI-23	Y		Y	
MN-1		X		X
MN-3	Y		Y	
MN-4	Y		Y	
MN-5		X		X

The tabular summary provided in the annual report establishes Washington County's compliance with B.4.2.c with existing controls, however a TMDL Implementation Plan, as provided below, explains the process the County will undergo to work towards full compliance.

### TMDL Implementation Plan

As previously mentioned, Washington County is less than 2% from achieving full compliance with TSS and less than 20% away from full compliance with TP for the Milwaukee River Watershed TMDL. This current level of

# DNR Expectations

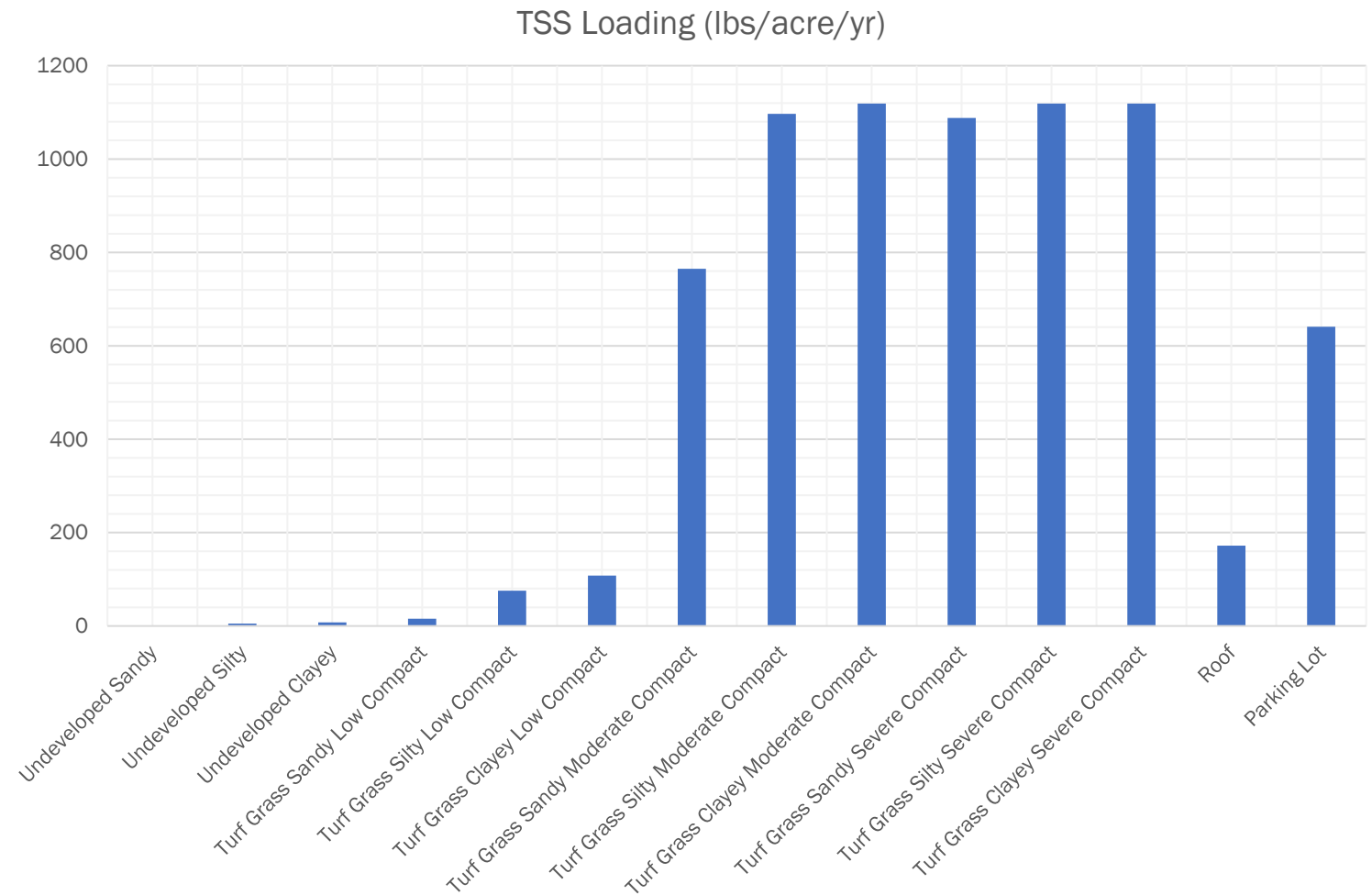
Plan needs to identify specific practices/locations, implementation targets and pollutant removal estimates

Table 4. Implementation Schedule

Project Title	Target Year	TSS Reduction (lbs)	TP Reduction (lbs)
Street Sweeper Pollutant Reduction Efficiency Improvement*	2023	TBD	TBD
Charter Steel Retrofit, PB-B	2024	2,538	3.1
Grady Park Streambank Restoration and Stabilization*	2025	TBD	TBD
Proprietary Storm Water Device Installation (ex. StormCeptor, BaySaver, etc.)*	2026	TBD	TBD
Peninsula Park Storm Water Facility	2027	18,842	120.0
WWTF Modification for Pollutant Trading	2028	26,700	516.0
Expansion of Facility IB-M	2029	3,008	6.4

# Other Stuff

- Storm water ordinance modifications for redevelopment (regional)
- Converting impervious or compacted pervious to pervious
- Low efficiency BMPs





# CONNECT WITH US

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