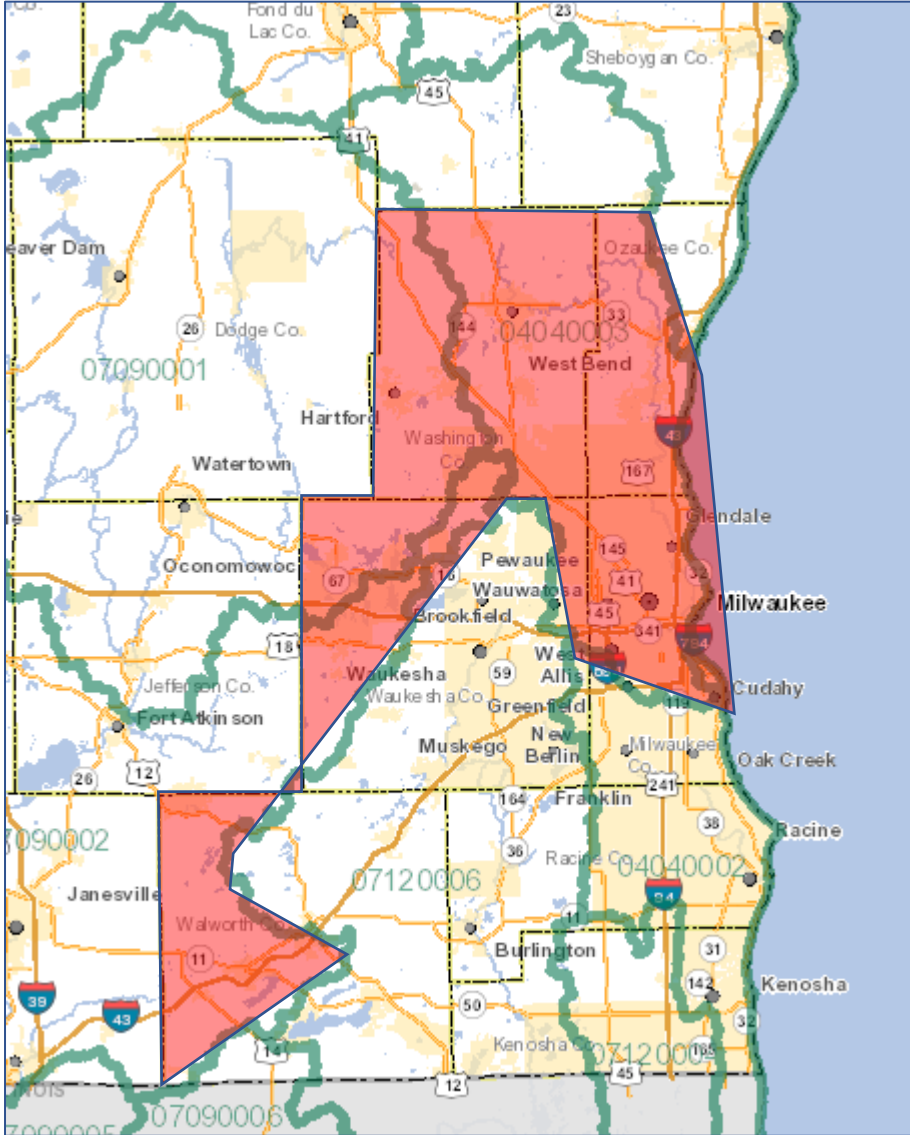


MS4 TMDL Implementation in Southeast Wisconsin

MS4s in Rock River & Milwaukee River Watersheds



Rock River MS4s - GP Appendix A

MS4s with DNR Implementation Plan Concurrence from Previous Permit

- Implement the plan
- Submit updates by October 31, 2023



MS4s without DNR Implementation Plan Concurrence from Previous Permit

Option #1 - Compliance during current permit term

- Submit proof of compliance by October 31, 2023

Option #2 - Compliance over multiple permit terms

- Sub-option #1
 - Achieve 20% TSS & 10% TP progress goals during current permit term
 - Submit implementation plan for next permit by October 31, 2023
- Sub-option #2
 - Implement prescriptive practices during current permit term
 - Submit implementation plan for next permit by October 31, 2023

TSS	Example 1 - Removal Surplus	Example 2 - Removal Deficit
Step 1 - Determine No Control Load (Example: 100 tons/yr)		
Step 2 - Determine TMDL Load Removal Requirement (Example: 60% TMDL Removal Required)		
Step 3 - Calculate Baseline (NR 151) Load Removal Requirement (Example: 20% of no controls load)		
Step 4 - Determine Required Load Removal Gap (Difference between TMDL requirement and Baseline Requirement)		
Step 5 - Determine 20% of Required Load Removal Gap		
Step 6 - Determine Interim Load Removal Requirement (Baseline Load plus 20% of Gap)		
Step 7 - Determine Load Removed with Existing Controls (Example 1: 32 tons/yr, Example 2: 14 tons/yr)		
Step 8 - Determine Actual Required Removal or Surplus for Current Permit Term (Difference between interim removal and existing removal)		

Rock River MS4 Compliance Status



- 3 - full compliance
- 3 - full compliance but need maintenance agreements
- 1 - adaptive management plan participant
- 8 - DNR plan concurrence from previous permit
 - Maintenance agreements, swale infiltration testing, ponds
- 6 – No DNR plan concurrence from previous permit
 - Sub-Option #1 (20% TSS/10% TP)
 - Maintenance agreements, swale infiltration testing, ponds

Milwaukee River MS4s

GP

- Map, tabular summary and implementation plan submitted by March 31, 2022



IP

- Map, tabular summary and implementation plan submitted per permit compliance schedule
- Negotiated benchmark commitments

Benchmark Commitment Examples

- Structural
 - Reconstruct 7 alleyways and install GI
 - Install GI on three parking lots
 - Complete one streambank stabilization
 - Complete one project to replace curb and gutter with swale
 - Pilot project to evaluate innovative BMP
 - Construct BMPs to treat 275,000 gallons annually
- Non-Structural
 - Develop criteria to planned road projects to reduction impervious area
 - Outfall assessment
 - Pilot program for stream monitoring
 - Develop partnership for private GI inspection/reporting
 - Develop enhanced pond maintenance program



Milwaukee Bacteria

GP

- ID sources (examples in permit) and Elimination plan – B.5.2
- Education - B.5.1
- Ordinances – B.5.3



IP

- ID sources
- Elimination plan
- IDDE bacteria monitoring
 - MS4 pick bacteria indicator (E. Coli, fecal coliform, human bacteriodes)
 - MS4 pick action level (235 coliform forming units)

Issues

- Modeling errors causing compliance schedule (missing compliance dates)
- Implementation plan with commitments
- Private maintenance agreements (Waukesha County Ordinance)



Recommendations

- Review implementation plan – Are you doing something to make progress?
- Contact Samantha Katt if questions (samantha.katt@wisconsin.gov, 414-522-0073)
- Make sure MS4 contact info up to date
- Sign up for gov delivery
- IP reissuance



CONNECT WITH US

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"WILD WISCONSIN:
OFF THE RECORD"