



**TMDL Plans**

MS4 Workshops – Pollutant Reduction  
and TMDL Stormwater Plans

Fall 2016

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**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



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**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.



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### 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"



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### 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)



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### MS4 TMDL Plan Required When...

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



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**Permit Considerations**

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



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**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



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**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



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**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



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**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



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**Same: PRP and TMDL Plan**

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



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### 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



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### Level of Planning Detail-Both Plans

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



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### Public Participation

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



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**Exercise: Q&A**

We will now test your understanding!



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**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



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