

Pollutant Reduction Plan (PRP) Mapping

FAQ

1. How do I know if I have to develop a Pollutant Reduction Plan (PRP)?

If you have D and/or E appendices in your requirements table, you must develop a PRP unless you have received advanced written waiver approval.

2. How many PRPs do I need to develop?

MS4 permittees need to develop a PRP for each/every impaired surface water identified in the MS4 Requirements Table as Appendix D or E. The individual PRPs can be combined into one document, but the calculations and BMP selections must be completed independently for the storm sewersheds of each impaired water.

3. Do I have to develop a PRP if I have appendices A thru C requirement?

NO, unless you also have Appendix D or E requirements.

4. What mapping elements in addition to the MCM 3 mapping requirements must be included if our MS4 must develop a PRP?

Additional PRP mapping elements include:

- a. Land Uses and/or Impervious/Pervious Surfaces
- b. Storm sewershed boundaries for each outfall discharging to the Chesapeake Bay or impaired waters.
- c. Locations of structural BMPs

5. How detailed does my map have to be?

Your Map must be detailed enough to identify the planning area relevant to Appendix D and/or Appendix E and demonstrate that BMPs are within the planning area.

6. Why is delineation of the storm sewershed needed?

Delineation identifies the storm sewershed/drainage area for an outfall, which is needed for calculating pollutant loads.

13. What are the pros and cons of Parsing?

Pros:

- It reduces the MS4s area of responsibility, and therefore their loads

Cons:

- It reduces the opportunities for the installation of BMPs

MS4 TMDL Plan Questions and Answers

- If I remodel the pollutant loads, do I have to use the original TMDL-required load reduction percentages?

Yes unless EPA agrees with something different.

- May I and some of my neighboring communities prepare and implement a regional MS4 TMDL Plan rather than do separate plans?

Yes. If neighboring municipalities share a TMDL responsibility DEP strongly encourages you to work together on developing and implementing a plan. The economy of scale and the ability to share the credit from BMPs located within multiple participating jurisdictions will often result in more timely and cost-effective outcomes.

- Can multiple communities work together to create a regional TMDL/Chesapeake Bay Plan?

Yes, same as a regional Chesapeake Bay PRP or regional Impaired Waters PRP.

- I have both an MS4 TMDL Plan requirement and a requirement to prepare a Chesapeake Bay Pollutant Reduction Plan. Can I combine them into a single plan?

Yes. There are about 20 municipalities in the Chesapeake Bay drainage area that also have TMDLs. It would make no sense to create separate plans. The water quality problems and the solutions are almost always the same.

- Can the load reductions required for a TMDL Plan also be credited to a Chesapeake Bay Plan?
Yes, if their location is such that they discharge both to the TMDL water body and the Chesapeake Bay drainage.

- I have to do both a TMDL Plan and a Chesapeake Bay PRP. Since there is a TMDL WLA do I need to estimate the current pollutant loading as is typically required in a PRP?

If the municipality chooses to remodel the work done in the TMDL it is a moot question. If they would prefer not to remodel, it depends. If the drainage areas match, and the TMDL is relatively current (done since 2005) it is possible to avoid the need for a loading calculation. The facts of the situation would need to be such that it was clear that the plan to satisfy the TMDL would also satisfy the requirement to reduce sediment to the impaired water by 10% during the permit term. Discuss the specifics with DEP.

Existing Loading Training Questions

1. What is the advantage of using the DEP Simplified method for planning?

Requires no resources beyond tables provided by DEP. It does not require use of GIS or modeling.

2. What is the critical missing input to the PRP Instructions "Simplified Method" example?

A means of establishing land use or cover percentages is not provided. The tables provide acres of pervious and impervious area without explaining the source of the data.

3. How do I obtain land use or cover percentages for use in the "Simplified Method?"

You can use (a) the DEP "Statewide MS4 Land Cover Estimates" table, available on DEP's MS4 website, or (b) Stroud/Wiki or (c) any independent land use mapping effort.

4. What are the advantages/disadvantages of using DEP's Land Cover Estimates Table?

Advantages: It was generated from National Land Cover Database (NLCD) data, so it is relatively accurate, on a UA basis. It is also easy to use.

Disadvantages: (a) It is accurate on a sub-UA basis only to the degree that land use is homogeneous within the UA. This means that if you have some sewersheds with a lot of impervious surfaces, and some with very little, the average reflected in the table may skew your results.

(b) The "outside of UA" percentage reflects the average of all the land in the municipality that is outside the UA, which may not be representative of the area outside the UA that drains into the UA.

5. What are the advantages/disadvantages of using Stroud/Wiki?

Advantages: It too was generated from NLCD data, so it is relatively accurate, and that accuracy is to a one-acre level.

Disadvantages: You have to free-draw the area you want land use for, which requires labor if you have many outfalls.