

WDNR Stormwater Permit Appendices A and C

UTILITIES COMMITTEE

JULY 12, 2022

WPDES Permit No. WI-S050075-3

- Wisconsin pollutant discharge elimination system
- Third Permit cycle
- Effective May 1, 2019
- Expires April 30, 2024
- Stormwater **quality** discharge permit
- Wisconsin version of NPDES

Key Terms

- MS4 = Municipal separate storm sewer system
- TMDL = total maximum daily load
- Green infrastructure = rain gardens, biofilters, porous pavement (not pipes)
- IDDE = illicit discharge detection and elimination
- TSS= total suspended solids
- TP = total phosphorus
- BMP = Best management practice = SMP = Stormwater Management Practice

Appendix A

- Applies to permittees subject to a TMDL approved prior to May 1, 2014
- Lower Fox River Basin and Lower Green Bay TMDL approved in May 2012
- 6 Reachsheds with requirement to remove Total Suspended Solids (TSS) and Total Phosphorus (TP)
- 2014 Citywide Plan is based on this TMDL and the previous permit
- Appendix A of the current permit includes options for compliance

Appendix A Options for Compliance

- A.2 Full Compliance existing at the start of the permit (May 1, 2019)
 - Meet reductions specified for each reachshed in the TMDL and submit documentation for compliance and long-term maintenance plans
- A.3 Implementation of an existing WDNR approved TMDL Compliance Plan OR Participation in Approved Adaptive Management Plan
 - City is currently working under TMDL compliance plan approved by DNR per the 2014 Citywide Plan
- A.4 Achieve Compliance During This Permit Term

Appendix A Options for Compliance

- A.5 Achieve Compliance Over Multiple Terms
 - A.5.1 – notification to DNR by March 31, 2020 which reachsheds are not in compliance
 - A.5.2 –Construct additional SMPs to achieve 20% of remaining TSS load and 10% of remaining TP load by end of current permit (April 30, 2024)
 - A.5.3 – if cannot meet any of the above, then meet the following 7 requirements:

A.5.3

- A.5.3.a. Create, update or revise Post-Construction Stormwater Ordinance that includes requirements stricter than the uniform statewide standards
- A.5.3.b Create or revise ordinance for maintenance agreements of privately owned SMPs and create and implement a program to verify and track private SMP maintenance
- A.5.3.c-create or revise ordinance to require record drawings of private SMPs and track them

A.5.3

- A.5.3.d - Implement, expand or optimize a leaf collection program coupled with street cleaning
- A.5.3.e - Inventory the condition of conveyance systems and outfalls for scour and erosion and develop a schedule to stabilize over a 5-year period
- A.5.3.f – Install at least one new structural SMP or enhance one or more existing structural SMPs, and develop a long-term maintenance plan
- A.5.3.g – Analyze current street cleaning program to determine if additional pollutant removal can be achieved and optimize the program

A.6

- Dates for reporting
- Annual Reporting Requirements
- Final Documentation – new Citywide Stormwater Management Plan
 - Updated mapping
 - Tabular summaries including TMSL wasteload allocations by reachshed, pollutant loads with and without SMPs, current removal levels being achieved
 - Updated written TMDL implementation plan, including options considered, removal and cost effectiveness of options considered, implementation schedule

Appendix C

- Applies to permittees subject to a TMDL approved after May 1, 2019
- TMDL for Upper Fox River and Wolf River Basins approved February 2020
- 2 reachsheds with requirement to remove Total Suspended Solids (TSS) and Total Phosphorus (TP)
- C.2 Full Compliance existing at the start of the permit (May 1, 2019)
- C.3 Participation in Approved Adaptive Management Plan
- C.4 Develop a TMDL Implementation Plan

Appendix C

- C.4 Develop a TMDL Implementation Plan
- Allows additional time to do similar items as required in Appendix A
 - Within 36 months of TMDL approval provide updated mapping (February 2023)
 - Within 36 months of TMDL approval provide modeling/analysis of pollutant loads and existing SMPs (February 2023)
 - Within 48 months provide written plan, including implementation schedule (February 2024)
- Annual Reporting Requirements

Questions?
