

BRAINSTORMING LIST OF ISSUES

Area issues:

- TMDL municipal boundary and NR 151.13 (MS4 modeled) area
- Areas of direct discharge to surface waters of the state in municipal boundary
- Other optional areas taken out of earlier MS4 modeling (stormwater permitted industries, 5+ acre areas to be developed)
- Internally drained areas
- Non-traditional permitted MS4 within municipal boundary (UW, WisDOT, County facilities)
- Annexed areas – shift from LA to WLA
- Agricultural within MS4 boundary
- New development areas since 2004 (accept designed % control, give automatic 80% or re-model)
- TMDL based on 2004 urban boundary?

Modeling input files and related issues:

- 10 year rainfall file in TMDL vs. Madison or Milwaukee 1- or 5-yr file
- Do extreme events need to be pulled from the 10-yr rainfall file similar to RR TMDL analysis
- NURP was used for RR TDML and MS4 modeling – same (other TMDLs?)
- What model versions are acceptable?
- WinSLAMM v. 9.3 for RR TMDL baseline loadings. Does using v.10 change baseline vs. v.9.4?
- P8 versus SLAMM adjustments.
- P8 load higher will adjustment factor be needed to be equivalent to TMDL/SLAMM mass?
- How to account for outside sources such as agricultural runoff in SLAMM
- Pumped runoff (Tiedeman and Paradise Pond are examples)
- Will different particle sizes be allowed or just NURP?
- Is P data in SLAMM representative of today given statewide P restriction on urban fertilizer?

Phosphorus management/treatment credit:

- Leaf collection – how to credit
- Alum treatment – within water of the state or prior?
- Engineered soil – compost leaches P; new mix will give what P removal credit?
- Infiltration
- Street sweeping
- Pet waste ordinances
- Stream Channel Erosion issue; SLAMM does not model such issue

April 3, 2012

RR TMDL Stormwater Implementation meeting

- Wetland Treatment credit (natural wetland, restored wetland, wetland maintenance)
- Underground drainage – runoff from other basin/reach
- What is compliance? Modeled or can other by design conditions accepted. How to credit leaf collection.
- Does compost and wood recycling affect P runoff from construction sites?
- Monthly (seasonal) MS4 discharge variation with P – seasonal optimization to reduce P such as with polymers

Practices/Technology issues:

- Will higher than 40% redevelopment standard be needed (DNR or locally required)?

Long term implementation issues

- Is 20% development urban area standard obsolete with a greater reduction due to MS4 WLA?
- Land use change draining to MS4 what is effect?
- Who and how will WLA and LA changes be tracked?
- Who and how will land use area changes be tracked?
- What will inspection scheduled be and what is reported?

MS4 trading/tracking issues

- Trade ratios - MS4 with agricultural, MS4 – MS4
- Can non-permitted urban sell credits to MS4 (e.g. swale treatment credit or other)?
- Are surrogate pollutants a concern with trade between MS4 and ag?
- Trading guidance needs updating to allow trades above 20% TSS standard for MS4s.

Miscellaneous

- MS4 WLA expressed in permit as annual average mass in lbs/d (not concentration limit).
- Appendix I in Rock River TMDL table has concentration limit that does not match up with calculation concentration using Appendix V and its annual WLA and associated area. Use Appendix V annual average mass limit and area to calculate an equivalent concentration limit. Appendix I concentration limits area an average of monthly average limits and is only an approximate representation of the concentration reduction and might be quite a bit off the reduction needed to meet the annual WLA reduction.
- Have construction site allocations been accounted for? [10% WLA assigned to construction & industrial storm water GP and wastewater GPs; Fox River TMDL is different]
- How to credit other beneficial changes such as redevelopment of brown fields. Any bonus or incentive credits for such areas?
- Are any additional sources of P or TSS not accounted/allocated for such as stream bank erosion?
- Sand versus salt deicers – no chloride WLA and sand contributes to sediment/TSS.
- When are non-permitted MS4s a significant source such that they should be permitted?