

Appendix 4 - Updates as of November 1, 2016 provided in Italics

Issues EPA Identified with Wisconsin's Legal Authority for the WPDES Program

(Organized as original LAB Report Appendix; Issues affecting storm water permittees being on page 4-10)

Issues Affecting Municipal, Industrial, and CAFO Permittees

EPA Issue	Identified Deficiency	DNR Proposed Action	Date Completed or Estimated to be Completed (as of Nov.1, 2016)
1	Section NR 205.07 (1) (v) and (2) (d), Wis. Adm. Code, pertaining to intentional treatment facility bypasses, should exclude overflows from collection systems, incorporate federal bypass limitations, and make bypass reporting requirements consistent with federal standards.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2013.
2	Wisconsin does not have a law or rule to implement federal regulations related to intake water pollutants, internal waste streams, measurement time periods for averaging water quality-based limits, and other related factors.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016</i>
3	Sections 283.53 (2) and 283.63, Wis. Stats., and ch. NR 203, Wis. Adm. Code, should provide a mechanism for terminating a permit, as well as allow an interested person to request a permit modification, revocation, reissuance, or termination.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
4	Wisconsin rules should prescribe the manner in which the State will exercise its statutory authority under s. 283.31 (6), Wis. Stats., for new facility location, design, construction, and capacity for cooling water intake structures.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: winter 2017.
5	Section 227.52, Wis. Stats., should be made consistent with federal law by not restricting the classes of persons who may seek judicial review in state court for the final approval or denial of WPDES permits, such as limiting judicial reviews based on a person's financial interest or proximate property ownership.	Seek statutory changes.	DNR has not specified a completion date for this issue.
6	Section 283.17 (1) and (2), Wis. Stats., which provides for a 10-year exemption from stricter thermal water quality-based limits for facilities modified to meet the limits, is overly broad and should eliminate protection for facilities with alternative thermal limits.	Seek statutory changes.	Statutory changes became effective in April 2016

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7	It is unclear whether DNR has the authority to incorporate the appropriate performance standards for new industrial effluent sources or federal effluent limitation guidelines into permits because not all current federal standards and guidelines are reflected in DNR's administrative rules.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
8	Section NR 106.145, Wis. Adm. Code, which addresses the establishment of water quality-based limits for mercury discharges, should be modified to comply with a February 2009 EPA decision that disapproved some aspects of the rule.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016</i>
9	Chapter NR 219, Wis. Adm. Code, that pertains to testing methods for point source discharges: <ul style="list-style-type: none"> ▪ should only allow the use of solid waste methods when approved by EPA; ▪ should be clarified to indicate when an EPA method became effective in the state; and ▪ should be clarified to indicate if it has been amended to include new EPA methods. 	Incorporate changes into administrative rules.	Administrative rule changes became effective in June 2015.
10	DNR should amend its administrative rules to address EPA's concerns dating from November 2000 to ensure that the setting of water quality-based limits is based on federal procedures for Great Lakes states discharging into the Great Lakes Basin.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i> In addition, in a December 2012 letter, EPA concluded that this issue had been resolved through a clarification by the Wisconsin Attorney General.
11	Section 283.31 (3), Wis. Stats., and chs. NR 106 and 217, Wis. Adm. Code, pertaining to the establishment of water quality-based limits for receiving water, do not include sufficient language to implement federal regulations.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
12	Section 283.31 (3), Wis. Stats., specifying that permits can only be issued for discharges that meet federal regulations, should include a provision to ensure compliance with federal water quality requirements.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.

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13	Chapters NR 216 and 243, Wis. Adm. Code, should identify circumstances when best management practices must be included as conditions in permits.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
14	Section NR 106.117, Wis. Adm. Code, should require that interim water quality-based limits, standards, and conditions in reissued permits be at least as stringent as those in the previous permits.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
15	Neither Wisconsin's statutes nor DNR's administrative rules provide for the implementation of federal requirements for compliance schedules in permits, such as rules that require reports on progress toward meeting a final water quality-based limit or mandated interim requirements.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
16	DNR's administrative rules do not include more stringent requirements for its pretreatment plan.	Incorporate changes into administrative rules.	Administrative rule changes became effective in February 2014.
17	Section NR 106.10, Wis. Adm. Code, should include procedures for establishing water quality-based limits for noncontact cooling water.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
18	Section NR 205.07 (1) (g), Wis. Adm. Code, should require a signature on permits and reports that requests the signer to certify to the truth, accuracy, and completeness of the information being provided to DNR.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
19	Wisconsin should have a law or rule that gives DNR the authority to issue permits to concentrated aquatic animal production facilities.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
20	Wisconsin law should provide for adjustments to water quality-based limits when part of a discharger's wastewater is disposed of into wells, municipal facilities, or by land application.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
21	DNR's administrative rules should include descriptions of elements to be included in fact sheets, including when specific permit conditions are required.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.

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EPA Issue	Identified Deficiency	DNR Proposed Action	Date Completed or Estimated to be Completed (as of Nov. 1, 2016)
22	DNR's process for public notice of permit actions should include mailing a draft permit copy to certain other agencies, such as federal and state agencies with jurisdiction over fish, shellfish, and wildlife resources, or using an acceptable equivalent method.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
27	Section 283.19 (2) (b), Wis. Stats., should define "new source" so that performance standards extend to new sources of discharges constructed between the date of promulgation of the Clean Water Act and the date of Wisconsin's promulgation of applicable rules, or Wisconsin should address the deficiency through rulemaking.	Seek statutory changes.	Statutory changes became effective in April 2016.
28	Sections NR 102.05 (3) (b), 106.06 (3) (b), 106.32 (2) (b), and 106.87 (1), Wis. Adm. Code, should provide that water quality-based limits are to be derived from and comply with receiving water quality standards under certain circumstances.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
29	Section NR 106.13, Wis. Adm. Code, pertaining to municipal facilities affected by liquids discharged from solid waste facilities should clarify whether DNR has mandatory or discretionary authority to establish a compliance schedule when water quality-based limits are exceeded. If the rule in question is mandatory, it should comply with federal regulations.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
30	Section NR 106.32 (2) (a), Wis. Adm. Code, should be revised so that water quality-based limit calculation procedures for ammonia continuous discharges require seven-day average and average monthly limit calculations for municipal facilities. Maximum daily and average monthly limits are to be used for other dischargers.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
31	Sections NR 106.32 (2) (b) 2. and (3) (a) 4. a. and 106.37 (2), Wis. Adm. Code, pertaining to water quality-based limit calculation procedures, should not allow additional time in compliance schedules for the gathering of data to justify a limit change or for demonstrations to justify a limit change.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
32	Section NR 106.07 (8), Wis. Adm. Code, pertaining to interim values of limits meant to protect aquatic and non-aquatic life until water quality criteria are established for a body of water, should only allow adding time to compliance schedules for discharges within the Great Lakes basin.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>

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33	DNR should clarify how it receives and manages discharge monitoring reports and data to evaluate compliance with certain water quality-based limits based on real-time conditions under s. NR 106.32 (3) (c) 2. and (4) (d), Wis. Adm. Code.	Provide written clarification to EPA.	DNR submitted written clarification to EPA in October 2011. In a December 2012 letter, EPA concluded that this issue had been resolved.
34	Section NR 106.32 (5) (c), Wis. Adm. Code, pertaining to water quality-based limit calculation procedures should require seven-day average limit calculations and average monthly limits for municipal facilities. Maximum daily and average monthly limits are to be used for other dischargers.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
35	Section NR 106.33 (2), Wis. Adm. Code, for setting seasonal water quality-based limits for ammonia should provide DNR with clear authority to set limits when there is a risk of exceeding limits in the receiving water.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
36	Section NR 106.34 (2), Wis. Adm. Code, for increasing ammonia water quality-based limits when certain older permits are reissued should conform to federal laws related to the application of anti-degradation procedures.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
37	Section NR 106.37 (1), Wis. Adm. Code, which establishes water quality-based limit calculation procedures, should not allow permittees to use a compliance schedule for meeting a variance from water quality standards.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
38	For permittees with stabilization ponds or lagoon systems, s. NR 106.38, Wis. Adm. Code, pertaining to the process for obtaining a variance from water quality-based limits for ammonia, should reference EPA requirements.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
39	Section NR 106.83 (2), Wis. Adm. Code, pertaining to the process for obtaining a variance from water quality-based limits for chloride should reference EPA requirements.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
40	Section NR 106.88 (1), Wis. Adm. Code, pertaining to water quality-based limit calculation procedures should mandate a limit for chloride whenever the discharge might negatively impact the quality of the receiving water.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>

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41	For limits based on acute criteria for continuous discharges, s. NR 106.88 (4), Wis. Adm. Code, should require seven-day average chloride limit calculations and average monthly chloride limits for municipal facilities. Maximum daily and average monthly limits are to be used for other discharges.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
42	Sections NR 106.87 (1) and 106.89 (2) and (3), Wis. Adm. Code, should reflect that suspension of limits on aggregate pollutants in a discharge are not necessary during a source reduction period for chloride whenever DNR can demonstrate limiting chloride is sufficient to maintain the quality of the receiving water.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
43	When a municipal facility cannot meet a water quality-based chloride limit due to indirect discharges from a public water system, s. NR 106.91, Wis. Adm. Code, should not allow DNR to set a different limit other than through a variance approved by EPA.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
44	The definition of “point source” in s. NR 205.03 (27) and (28), Wis. Adm. Code, inappropriately excludes landfill leachate collection systems, and the definition for “pollutant” inappropriately excludes “filter backwash.”	Obtain a legal opinion from Wisconsin’s Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
45	DNR’s administrative rules should reflect federal regulations pertaining to the effect of a permit by prohibiting its use as a property interest and prohibiting its use as an authorization to injure persons or property.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
46	DNR’s administrative rules should include expedited procedures for obtaining a variance from water quality-based limits and for time extensions for filing variance requests.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
47	Section NR 205.07 (1) (g), Wis. Adm. Code, which allows non-corporate officers to sign a permit, should require submission of documentation that verifies the signatory’s designated authority.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
48	DNR’s administrative rules should include permit termination as a consequence of violating the permit requirements.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.

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49	Section NR 205.07 (1) (q) 1., Wis. Adm. Code, should require a permitted facility to provide notice to DNR of an alteration or addition to the facility that may be a new source of pollutant discharge.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
50	DNR's administrative rules should contain a provision for a notice of intent to terminate a WPDES permit.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
51	Section 283.49, Wis. Stats., and ch. NR 203, Wis. Adm. Code, should provide for any interested person to request a draft permit hearing rather than require a group of five or more individuals to request a hearing.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin law is consistent with federal regulations. Incorporate changes into DNR's administrative rules.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012, and administrative rule changes became effective in August 2015. In a December 2012 letter, EPA concluded that this issue had been resolved.
58	Section NR 205.03 (44), Wis. Adm. Code, should clarify whether its definition of "waters of the state" includes specific categories that are included in the federal definition for "waters of the United States."	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
59	Chapter NR 500, Wis. Adm. Code, should not have a WPDES permit exemption for the disposal of solid wastes, wet wastes, or semi-liquid wastes to a solid waste facility.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin law is consistent with federal regulations.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
60	The exemption for discharges from private alcohol fuel production systems onto the owner's property under s. 283.61, Wis. Stats., and s. NR 200.03 (3) (f), Wis. Adm. Code, should not apply to discharges that reach the waters of the United States.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
61	DNR does not have administrative rules that establish permit application requirements for several categories of dischargers, including existing manufacturing, mining, and aquatic animal production facilities.	Incorporate changes into administrative rules.	Administrative rule promulgation is in progress. Estimated rule publication: summer 2017.
62	DNR's administrative rules pertaining to actions it can take regarding the status of a permit should reflect federal regulations, including providing for "revocation and reissuance" of a permit rather than a "suspension."	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.

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63	DNR's rules should allow the State to assess multiple penalties for multiple instances of knowingly making false statements on applications, reports, or documents.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
64	DNR's administrative rules should provide for public participation in the enforcement process, including intervention in civil or administrative actions to obtain remedies for violations, and providing written responses to citizen complaints.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin law is consistent with federal regulations.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.
65	DNR's administrative rules should provide for the informational and procedural requirements for preparing a draft permit when the State determines it will proceed to permit issuance.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
66	DNR's administrative rules should require a fact sheet for every permitted facility or activity, including for discharges of less than 500,000 gallons per day.	Incorporate changes into administrative rules.	Administrative rule changes became effective in August 2015.
68	Section 283.13, Wis. Stats., which pertains to the dates when water quality-based limits should have been established, should reflect the dates specified in the Clean Water Act.	Request a reevaluation by EPA.	In a December 2012 letter, EPA concluded that, after additional review, this matter was not an issue needing to be addressed.
69	Section 283.81, Wis. Stats., which allows DNR to waive compliance with WPDES requirements to prevent an emergency threatening public health, safety, or welfare, is not consistent with federal program requirements.	Negotiate with EPA to retain Wisconsin's current legal authority.	DNR has not specified a completion date for this issue.
70	Section NR 106.05 (8), Wis. Adm. Code, is inconsistent with federal law because it allows a permittee to request alternative water quality-based limits when a test for a pollutant is insufficiently sensitive, even when discharges that result may negatively impact the quality of the receiving water.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
71	DNR should establish a "mixing zone" phase-out plan for existing discharges of chemicals that accumulate in plants and animals within the Great Lakes basin.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>

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72	Sections NR 106.06 (4) (c) 5., (8), and (10), and 102.05(3), Wis. Adm. Code, allow a discharge to be diluted by the receiving water, which may be inconsistent with the Clean Water Act if it allows for continued violations of water quality standards when the water is already impaired with the pollutant.	Provide written clarification to EPA.	Information was provided to EPA in October 2011. In a December 2012 letter, EPA concluded that, after additional review, this matter was not an issue needing to be addressed.
73	Sections NR 106.06 (4) (c) 5. and 10., Wis. Adm. Code, which mandate that DNR provide time for a discharger to complete mixing demonstrations, does not comply with federal law if this time is included in a permittee's compliance schedule.	Provide written clarification to EPA.	Information was provided to EPA in October 2011. In a December 2012 letter, EPA concluded that this issue had been resolved.
74	Sections NR 106.08 and 106.09, Wis. Adm. Code, which pertain to limitations of the aggregate pollutants in a discharge, should include procedures to determine the variability of the discharge whenever there are fewer than five samples and there is a risk to receiving water quality.	Incorporate changes into administrative rules.	<i>Administrative rule changes became effective in September 2016.</i>
75	Wisconsin should clarify whether it has adequate permitting and enforcement authority pursuant to federal law given s. 227.10 (2m), Wis. Stats., which states that no agency may implement or enforce a standard, requirement, or threshold unless it is explicitly required or permitted by statute or by rule.	Obtain a legal opinion from Wisconsin's Attorney General to demonstrate that Wisconsin has adequate legal authority.	The Attorney General issued a legal opinion that was submitted to EPA in January 2012. In a December 2012 letter, EPA concluded that this issue had been resolved.

Issues Affecting Storm Water Permittees

EPA Issue	Identified Deficiency	DNR Proposed Action	Date Completed or Estimated to be Completed (as of Nov. 1, 2016)
23	Section 30.2022 (1), Wis. Stats., and s. NR 216.42 (5), Wis. Adm. Code, should include DNR's responsibility to regulate storm water discharges at Wisconsin Department of Transportation (DOT) construction sites.	Enact statutory changes. Incorporate changes into administrative rules.	Statutory changes became effective in April 2016. DNR has not specified a completion date for administrative rule changes.
24	Section 281.33, Wis. Stats., and s. NR 216.42 (4), (6) and (9), Wis. Adm. Code, should include DNR's responsibility to regulate storm water discharges at construction sites overseen by other state agencies, including construction sites for commercial buildings, one- and two-family dwellings, and those sites covered under other DNR environmental programs.	Enact statutory changes. Incorporate changes into administrative rules.	Statutory changes became effective in July 2013. <i>A court-ordered stipulation, MEDC v. DNR, Civ. No. 15-CV-2409 (Dane County Apr. 16, 2016) limits use of "other DNR environmental programs" to regulate storm water.</i> No completion date has been specified for the administrative rule changes.
25	Section NR 216.415 (4) and (8) (b) 3., Wis. Adm. Code, should not grant authority to municipalities to administer construction site storm water general permits on DNR's behalf, preclude a landowner from seeking an individual permit, or exempt dischargers from filing a notice of intent when five acres or more of land will be disturbed.	Incorporate changes into administrative rules.	<i>A court-ordered stipulation, MEDC v. DNR, Civ. No. 15-CV-2409 (Dane County Apr. 16, 2016) prohibits authorization of additional local programs.</i> DNR has not specified a completion date for the administrative rule changes.
26	Section 30.2022, Wis. Stats., and s. NR 216.022, Wis. Adm. Code, should not rely on agreements between DNR and other state agencies, such as DOT, for the regulation of municipal separate storm water system dischargers.	Seek statutory changes. Incorporate changes into administrative rules.	<i>Statutory changes became effective in April 2016.</i> DNR has not specified completion dates for administrative rule changes.
52	Section NR 216.21 (2) (b), Wis. Adm. Code, pertaining to the applicability of certain storm water permits, does not include access roads and rail lines, which are included in federal regulations.	Incorporate changes into administrative rules.	<i>DNR's Tier II General Permit includes roads and rails.</i> DNR has not specified a completion date for the administrative rule changes.
53	Section NR 216.21 (3) (e), Wis. Adm. Code, should require that facilities submit latitude and longitude information when certifying that industrial materials are protected by a storm resistant shelter to prevent exposure to storm water.	Require WPDES permittees to include facility location information on their annual report forms. Incorporate changes into administrative rules.	The annual report form was modified to request the required information in February 2014. DNR has not specified a completion date for the administrative rule changes.

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54	Section NR 216.002, Wis. Adm. Code, should require storm water discharge permits for discharges by construction sites smaller than one acre when the site is part of a common development plan.	No planned action.	In a December 2012 letter, EPA concluded that, after additional review, this matter was not an issue needing to be addressed.
55	Section NR 216.002 (11), Wis. Adm. Code, pertaining to the definition of illicit discharges to a municipal separate storm sewer system should be broadened to include all of the classes of activities found in federal regulations.	Incorporate changes into administrative rules.	<i>Wis. Stat. 283.33(1)(d) provides legal authority to regulate discharges which are found to be a significant contributor of pollutants.</i> DNR has not specified a completion date for the administrative rule changes.
56	Section NR 216.07 (8), Wis. Adm. Code, which requires annual reports from storm water permittees, should require permittees to give notice when they rely on another governmental entity to satisfy some of the permit obligations.	Request permittees to include information about reliance on another entity as part of their annual reports. Incorporate changes into administrative rules.	The annual report form was modified in February 2012 to request the required information. DNR has not specified a completion date for the administrative rule changes.
57	Section NR 216.07 (8), Wis. Adm. Code, which requires annual reports from storm water permittees, should require permittees to report proposed changes to storm water management programs that were established as a permit condition.	Request permittees to include information about proposed changes in storm water management programs as part of their annual reports. Incorporate changes into administrative rules.	The annual report form was modified in February 2012 to request the required information. DNR has not specified a completion date for the administrative rule changes.
67	DNR's administrative rules for small municipal separate storm water systems should require storm water management program evaluations and specify that records are available to the public.	Require permittees to include program evaluation information in their annual reports. Incorporate changes into administrative rules.	The annual separate storm water report form was modified in February 2012 to request the required information. DNR has not specified a completion date for the administrative rule changes.