

Michigan Municipal Separate Storm Sewer System (MS4) Permit Total Maximum Daily Loads

WATER BUREAU COMPLIANCE ASSISTANCE

Introduction

These fact sheets are intended to provide Municipal Separate Storm Sewer System (MS4) permittees compliance assistance in addressing a Total Maximum Daily Load (TMDL). A TMDL is required, under Section 303(d) of the federal Clean Water Act, when waterbodies are not meeting Michigan's Water Quality Standards (WQS). The purpose is to establish allowable loadings of pollutants for a waterbody to meet WQS.

TMDL requirements are under Part I.A.b.1, pages 9-10, of the Watershed General Permit, and, Part I A.4, page 6, of the Jurisdictional General Permit. To meet them:

1. Identify Potential Pollutant Sources

Identification of MS4 discharge points in the TMDL watershed, and the catchment characteristics connected to those points is an important tool to use in identifying areas to target for monitoring and implementation. Habitat quality investigations, flow measurements, sampling, and other tools can also be used to figure out where problems come from. In this permit cycle, progress will focus on pollutant source identification and implementing actions to address known problems.

2. Identify Actions to Implement

Individual compliance assistance documents have been developed for a number of TMDL pollutants. A list of actions to address specific TMDLs can be found in the compliance assistance document for that TMDL. Permittees should choose relevant actions. Some may require collaboration with other jurisdictions. In which case, the responsibilities for each jurisdiction should be identified in detail.

3. Prioritize the Actions

Once actions are selected, prioritize them for implementation, including on-going actions, and include them in the Storm Water Pollution Prevention Initiative (SWPPI) or Storm Water Management Program (SWMP).

4. Monitoring Requirements (E. coli and Phosphorus only)

In addition to actions, permittees are required to conduct monitoring for Phosphorus and *E. coli* TMDLs. There are three options in the Watershed General Permit and two in the Jurisdictional General Permit.

Option 1 -- Discharge Point Monitoring

This requires one representative storm water sample taken from at least 50% of the major discharge points ($\geq 36"$ at the widest cross-section of a pipe or open conveyance) discharging directly to surface waters within the TMDL watershed. Monitoring shall occur within three years of certificate of coverage (COC) issuance.

All monitoring results, combined with other findings, shall be used to identify further actions targeted in the next permit, and shall be included in the second progress report.



Option 2 -- Elective Option
(Watershed General Permit only)

Permittees may implement a monitoring program developed collaboratively with their partners. This could include ambient monitoring - to locate "hot spots" - or a combination of ambient and discharge point monitoring where there are known problems.

All monitoring results, combined with other findings, shall be used to identify further actions targeted in the next permit, and shall be included in the second progress report.

Option 3 -- The Alternative Approach

An alternative may be submitted for approval. This is applicable if the permittee already has enough information and a plan for prioritizing and controlling pollutants consistent with a TMDL.

The alternative approach shall be submitted with the SWPPI or SWMP.

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