

**IMPLEMENTABLE**

**TMDLS:**

**AN EXERCISE IN WHAT MAKES A  
TMDL USEFUL TO ITS USERS**

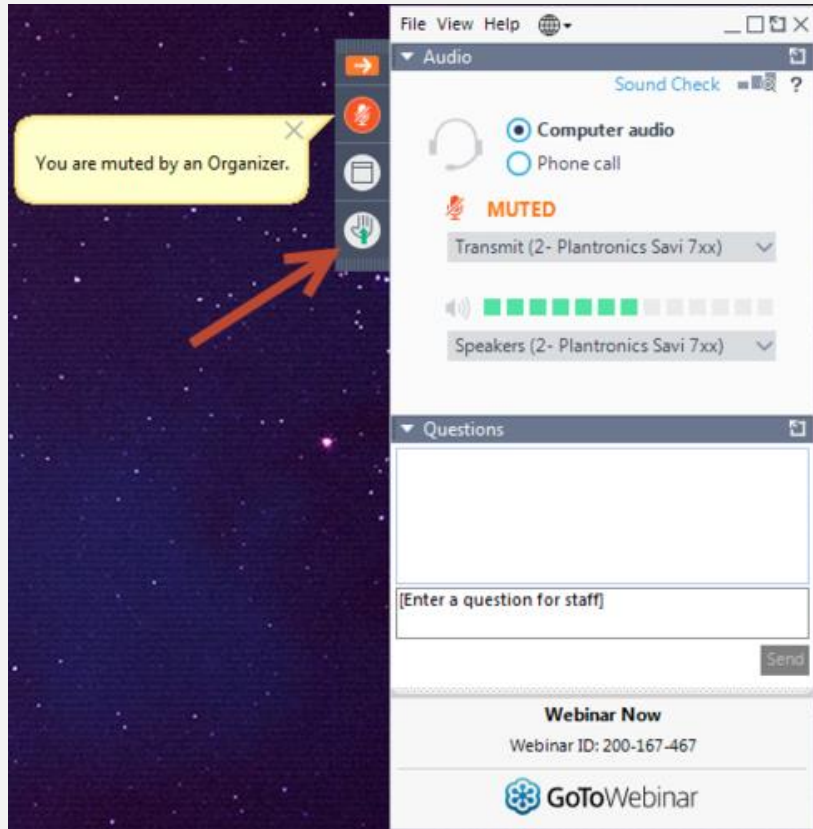
2020 NATIONAL  
CWA 303(D) TRAINING WORKSHOP  
MAY 28<sup>TH</sup>, 2020

# SESSION OUTLINE – 90 MINUTES

1. Warm-up and Recap of Previous Work
2. State Perspective and Examples - Kristy Fortman (MT DEQ)
3. Exercise & Discussion: Who Uses TMDLs?
  - What are they using TMDLs for?
  - How can TMDLs support those uses?

# PARTICIPATION IN VIRTUAL DISCUSSION

## I. RAISE YOUR HAND TO QUEUE TO SPEAK



## 2. USE THE ONLINE SURVEY TO WRITE-IN AND SUBMIT ADDITIONAL RESPONSES

- <https://forms.gle/BSUNyfASbFkpim3h7>

## 3. QUESTIONS PANE

Warm-Up

Q:

**WHAT MAKES A  
TMDL  
“IMPLEMENTABLE?”**

# RECAP OF SOME PREVIOUS WORK

- 2004 Program Evaluation Report
- 2002-2007 TMDL Program Results Analysis Project
  - 2007 WEF Conference in Bellevue, WA
  - [2007 Developing Effective NPS TMDLs: An Evaluation of the TMDL Development Process](#)
- [2008 ELI Shepherdstown Proceedings](#)
- 2010 EPA Implementation-ready TMDL Workgroup
- [2017 NEIWPCC “Examples of TMDL Implementation” Webinar](#)
- [2018 ELI Shepherdstown Proceedings](#)

1. Warm-up and Recap of Previous Work

**2. State Perspective and Examples - Kristy Fortman (MT)**

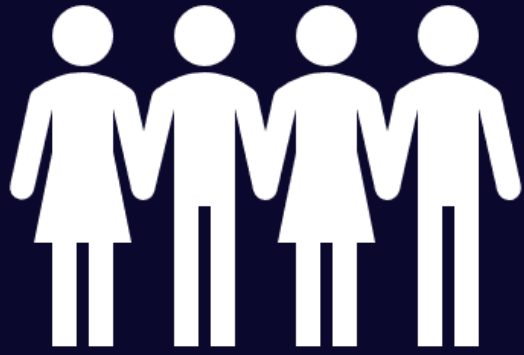
3. Exercise & Discussion: Who Uses TMDLs?

- What are they using TMDLs for?
- How can TMDLs support those uses?

1. Warm-up and Recap of Previous Work
2. State Perspective and Examples - Kristy Fortman (MT)

### **3. Exercise & Discussion: Who Uses TMDLs?**

- What are they using TMDLs for?
- How can TMDLs support those uses?



## ACTIVITY:

1. What does each audience use a TMDL for?
2. How can TMDLs support those uses?

**NPS Staff**

**NPDES Permit Writer**

**Permittee**

**Watershed Group**

**Local Resident**



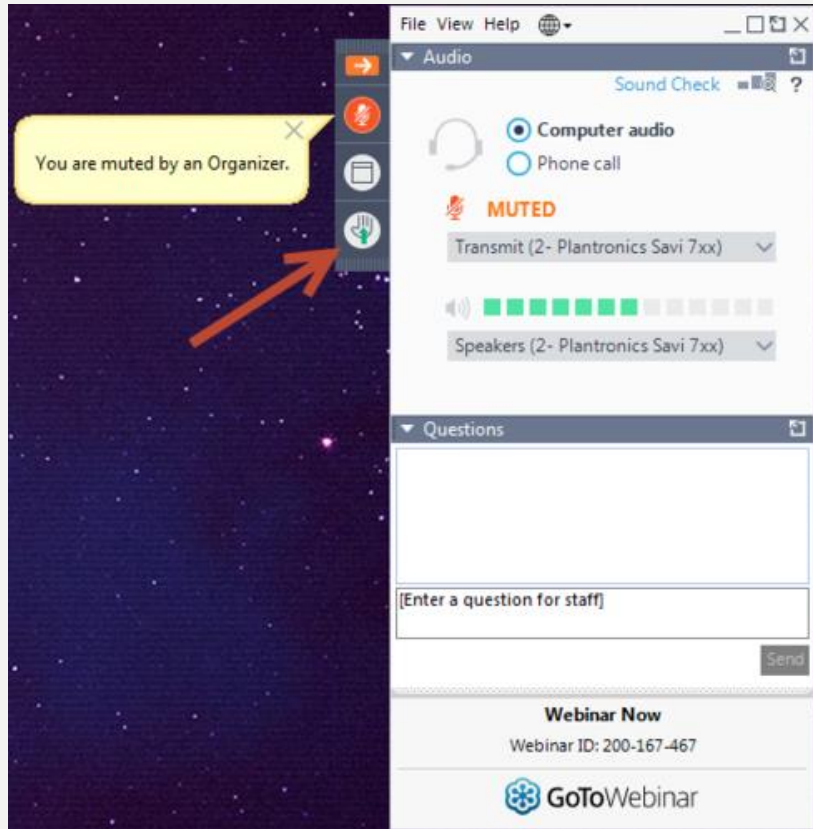
Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	What does the audience use a TMDL for?	How can TMDLs support those uses?
Permit Writers		
Permittees		
Watershed Groups		
Local Residents		

What does the audience use a TMDL for?

How can TMDLs support those uses?

# PARTICIPATION IN VIRTUAL DISCUSSION

## I. RAISE YOUR HAND TO QUEUE TO SPEAK



## 2. USE THE ONLINE SURVEY TO WRITE-IN AND SUBMIT ADDITIONAL RESPONSES

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## 3. QUESTIONS PANE

Audience	Use TMDLs to/for...	Benefit from...
<b>NPS Staff</b>	<ul style="list-style-type: none"> <li>• Load Allocations</li> <li>• Building Partnerships</li> <li>• Strengthen funding initiatives</li> <li>• Guide grantees on important elements to include in applications</li> <li>• Review/develop 9-element WBPs</li> <li>• Prioritize 319 grant distribution (plans and projects)</li> </ul>	<ul style="list-style-type: none"> <li>• Including percent reductions needed, and detailing how they link to specific BMPs</li> <li>• Thinking holistically about the TMDL's value in a watershed context – how can the document be transferable to other CWA programs?</li> <li>• Highlighting benefits not only to the watershed, but on-the-ground (e.g. how does this make my cows healthier)</li> <li>• Detailed LAs specific to sources or areas</li> <li>• Descriptions of effective BMPs</li> <li>• Ranked source contributions</li> </ul>
Permit Writers		
Permittees		
Watershed Groups		
Local Residents		

Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	<ul style="list-style-type: none"> <li>• Understanding assumptions and data behind WLAs</li> <li>• Knowing when there is a WLA for a facility</li> <li>• Establish WQBELs consistent with WLAs</li> <li>• Characterize cumulative or downstream impacts of PSs</li> </ul>	<ul style="list-style-type: none"> <li>• TMDL-writer understanding what permit writers need before starting a TMDL</li> <li>• A clear breakdown of the assumptions used to derive allocations.</li> <li>• Converting daily load into permit needs, permits often do not include daily loads.</li> <li>• Discussing importance of concentrations vs. load limits</li> <li>• Explaining critical conditions to align timeframes</li> <li>• Putting in as much information as we can</li> </ul>
Permit Writers		
Permittees		
Watershed Groups		
Local Residents		

Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	<ul style="list-style-type: none"> <li>Looking at WLA, effluent limitations, asset planning</li> <li>Meeting requirements for permit renewals, costs</li> <li>Why me and not them?</li> <li>Trading or optimization tools</li> <li>Advocate for certain WQBELs</li> <li>Advocate for funding (SRF, Urban Waters, etc.)</li> <li>Compliance schedules</li> <li>Understanding accountability when not meeting targets</li> </ul>	<ul style="list-style-type: none"> <li>More specific numbers and rigor for stormwater permit writers</li> <li>Characterizing PS contributions as specifically as possible</li> <li>Providing detailed WLAs specific to sources or areas</li> <li>Getting parties to the table as soon as possible</li> </ul>
Permit Writers		
<b>Permittees</b>		
Watershed Groups		
Local Residents		

Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	<ul style="list-style-type: none"> <li>• Protect/restore local water quality</li> <li>• Identify problems and solutions in the watershed</li> </ul>	<ul style="list-style-type: none"> <li>• Being as specific/detailed about allocations, sources, and implementation as possible</li> </ul>
Permit Writers	<ul style="list-style-type: none"> <li>• Secure funding</li> <li>• Removing invasive species and restoring riparian areas</li> </ul>	<ul style="list-style-type: none"> <li>• Strong reasonable assurance</li> <li>• The more specificity in implementation goals and activities the better - easier to award for 319</li> </ul>
Permittees	<ul style="list-style-type: none"> <li>• Build group capacity and purpose</li> <li>• Develop 9-element WBPs</li> <li>• Prioritize/guide implementation projects</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive monitoring to identify problems</li> <li>• Supply supporting info and describe roles</li> </ul>
Watershed Groups	<ul style="list-style-type: none"> <li>• Learn about the CWA, agency roles, and local water resource issues</li> </ul>	<ul style="list-style-type: none"> <li>• Ranked source contributions</li> <li>• Developing multi-stressor TMDLs on a watershed scale</li> </ul>
Local Residents		<ul style="list-style-type: none"> <li>• Explaining next steps of the CWA process</li> </ul>

Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	<ul style="list-style-type: none"> <li>Find information about local water quality</li> <li>Consider impacts on property uses</li> <li>Load allocations, implementation plan</li> <li>Advocate for funding (SRF, 319, USDA, etc.)</li> <li>Who's on the hook to do what?</li> <li>Advocate for water quality restoration to protect uses</li> </ul>	<ul style="list-style-type: none"> <li>Language that residents can engage with</li> <li>Incorporating local input and highlighting the good</li> <li>Awareness that things can begin without the TMDL</li> <li>Early involvement in the science and development approach, mechanism to achieve, and equity</li> <li>Supply supporting info and describe roles</li> <li>Clearly state impact and requirements post-TMDL</li> </ul>
Permit Writers		
Permittees		
Watershed Groups		
Local Residents		

Audience	Use TMDLs to/for...	Benefit from...
NPS Staff	What does the audience use a TMDL for?	How can TMDLs support those uses?
Permit Writers		
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Local Residents		

What does the audience use a TMDL for?

How can TMDLs support those uses?



Audience	Example of Existing Resource to Support TMDL Development
<b>NPS Staff</b>	<ul style="list-style-type: none"> <li>• <a href="#">Handbook for Developing Watershed Plans to Restore &amp; Protect Our Waters</a> <ul style="list-style-type: none"> <li>- <a href="#">Quick Guide to Developing Watershed Plans</a></li> <li>- <a href="#">Critical Source Area Identification &amp; BMP Selection</a></li> </ul> </li> </ul>
<b>Permit Writer</b>	<ul style="list-style-type: none"> <li>• <a href="#">Permitting to Meet a TMDL FAQs</a></li> <li>• <a href="#">Helpful Practices for Addressing PSs and Implementing TMDLs in NPDES Permits (R9)</a></li> <li>• <a href="#">TMDL to NPDES Permits Training Modules</a> <ul style="list-style-type: none"> <li>- <a href="#">Understanding WLA Implementation in Permits: A Primer for TMDL Developers</a></li> </ul> </li> </ul>
<b>Permittee</b>	<ul style="list-style-type: none"> <li>• <a href="#">Principles of Design &amp; Operations of WWTP Systems for Plant Operators...</a></li> <li>• <a href="#">Case Studies on Implementing Low-Cost Modifications to Improve Nutrient Reduction at WWTPs</a></li> </ul>
<b>Watershed Group</b>	<ul style="list-style-type: none"> <li>• A Manual of Conservation Practices to Reduce Pollution Loads Generated from NPS <ul style="list-style-type: none"> <li>- <a href="#">Implementation Appendix</a></li> </ul> </li> <li>• <a href="#">A Guide for Conducting Watershed Outreach Campaigns</a></li> </ul>
<b>Local Resident</b>	<ul style="list-style-type: none"> <li>• State Continuing Planning Process (CPP) under 40 CFR 130.7(a) <ul style="list-style-type: none"> <li>- ONLY works if plans are current/accurate</li> </ul> </li> </ul>