



*Florida Department of
Environmental Protection*

Implementing TMDLs

Presentation for the
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Overview of Presentations

Outline of Options

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Nutrient Reduction Plans

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MS4 Requirements for Impaired Waters

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Understanding Your Options

Category 1 - Attaining all designated uses

Category 2 - Not impaired and no TMDL is needed

Category 3 - Insufficient data to verify impairment (3a, 3b, 3c)

Category 4 - Sufficient data to verify an impairment but no TMDL is needed because:

4a - A TMDL has already been done

4b - Existing or proposed measures will attain water quality standards. Reasonable Assurance

4c - Impairment is not caused by a pollutant (e.g., hydrology)

4d - No causative pollutant has been identified (e.g., DO)

4e - On-going restoration activities are underway to restore the waterbody

Category 5 - Verified impaired and a TMDL is required





Verified Impaired but State TMDL not Needed (Category 4)

- 4a – A TMDL has already been done
- 4b – Existing or proposed measures will attain water quality standards (Reasonable Assurance)
- 4c – Impairment is not caused by a pollutant (e.g., hydrology)
- 4d – No causative pollutant has been identified (e.g., DO)
- 4e – On-going restoration activities are underway to restore the waterbody



Note: EPA could develop a TMDL



Factors to Consider

- 4(b) Reasonable Assurance
 - Must precede TMDL adoption
 - Precludes EPA from developing a TMDL
 - Substantial effort/outlines how WQ standards will be met
- 4(e) Reduction Plan
 - Remains on the 303(d) list; EPA might still develop a TMDL
 - Shows actions, but not necessarily restoration
 - Must precede a TMDL
 - Delays, but does not preclude, a TMDL





Verified Impaired and State TMDL is Required (Category 5)

- TMDL not yet adopted
- TMDL adopted, BMAP not underway
- TMDL adopted, BMAP development underway
- TMDL adopted, BMAP adopted





MS4 Permit Requirements

Part VIII.B Requirement for Impaired Waters with DEP adopted or EPA established TMDLs

- Identify all waterbodies with TMDLs
- Prioritize TMDLs for implementation to reduce discharge of pollutants





MS4 Permit Requirements

If a TMDL and BMAP are adopted or a BMAP is within 2 years of adoption:

Comply with the provisions of the BMAP and/or implementation plan.





MS4 Permit Requirements

If a TMDL is adopted* but the BMAP is not underway, develop a:

1. TMDL Prioritization Report
2. TMDL Monitoring and Assessment Plan
3. TMDL Monitoring
4. TMDL Implementation Plan



*Either DEP Adopted or EPA Established



MS4 Permit Requirements

If a fecal coliform TMDL is identified as the high priority in the Prioritization Report, then implement the *Fecal Coliform TMDL Tool Kit*:

- Identify sources
- Determine management actions to address sources
- Develop a monitoring plan





TMDL Prioritization Plan

- “Status” of TMDL:
 - TMDL not yet adopted
 - TMDL adopted, BMAP not underway
 - TMDL adopted, BMAP development underway
 - TMDL adopted, BMAP adopted
- Questions to consider:
 - DEP or EPA TMDL
 - Pollutant of concern
 - Significance of waterbody

