



## TMDL Revisions

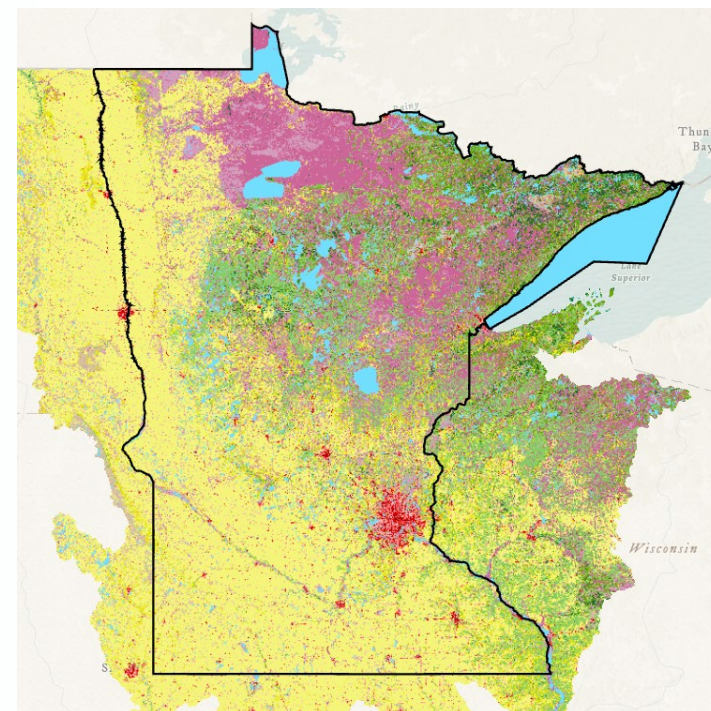
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# TMDL revisions in Minnesota

## Outline

- Why does MN revise TMDLs?
- Examples of TMDL revisions
- Process overview



# Permit implications: WLAs

- New or expanded wastewater discharges (TSS and *E. coli*)
- MS4 boundary changes
  - Newly regulated MS4s
  - Changing MS4 boundaries (new development, new legislation)
  - Decennial census urban area changes
- Errors in WLAs
- Other: WLA needed; new TMDL target



# New or expanded wastewater (TSS and *E. coli*)

- Revising TSS and *E. coli* WLAs for new or expanding wastewater discharges
  - Permitted effluent limits at or below the instream target
  - Loading capacity revised by the same amount of WLA revision
  - Public notice through wastewater permit PN
- Section D.3.c in All Things TMDL for more information  
(<https://www.pca.state.mn.us/sites/default/files/wq-iw1-72.pdf>)

Expansion	Approved WLA	Flow increase	TSS LC increase	Modified WLA
Wastewater discharge	186,506 kg/yr 510.98 kg/d	1.5 cfs	–	227,952 kg/yr 625 kg/d
Mississippi R LC	–	1.5 cfs	41,446 kg/yr 114 kg/d	–

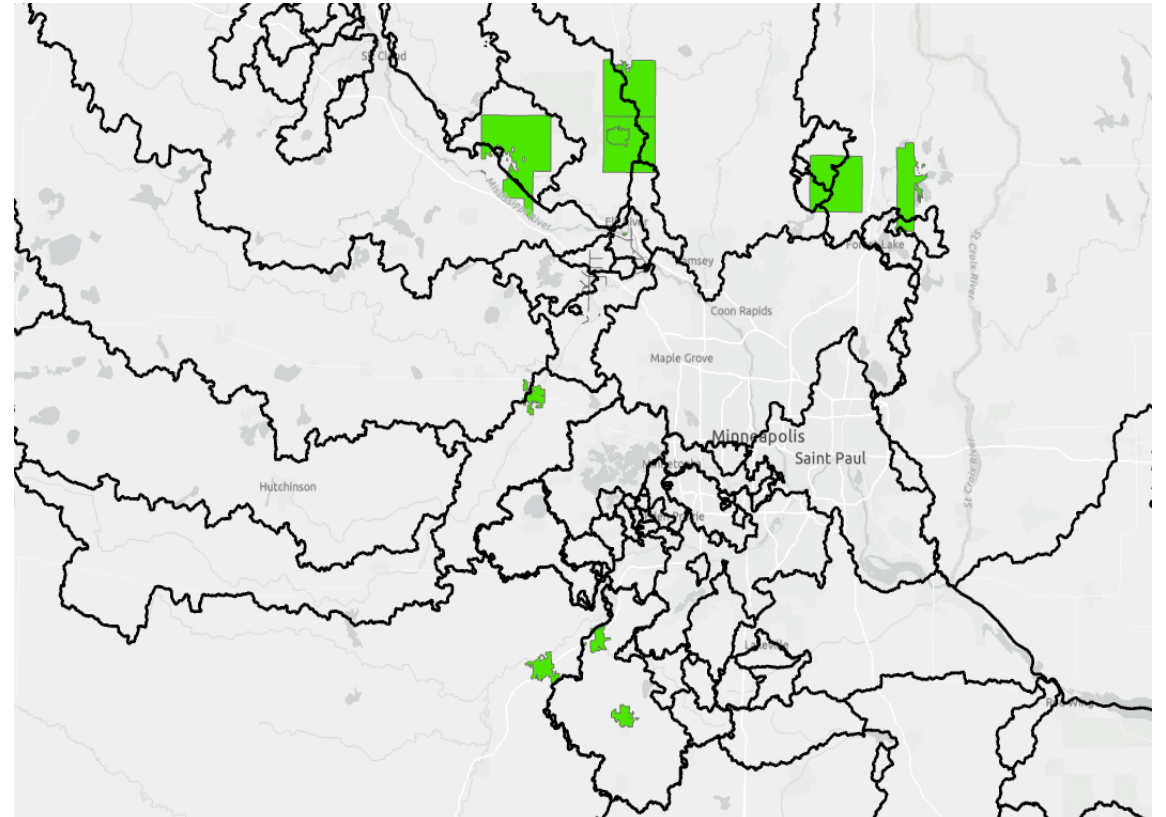
# MS4 allocation transfers (2019)

- Account for newly regulated MS4s (after 2010 Decennial Census)
- Shift from LA to WLA to accommodate additional regulated MS4 area; loading capacity did not change
- 6 modification memos; final memos posted online ([modification to Blue Earth Fecal Coliform TMDL example](#))
- Put on public notice (although not required)
- Process with EPA
  - Communication to determine approach
  - Sent final memos to EPA as notification; did not submit to EPA for review and approval



# Another round of MS4 WLA transfers

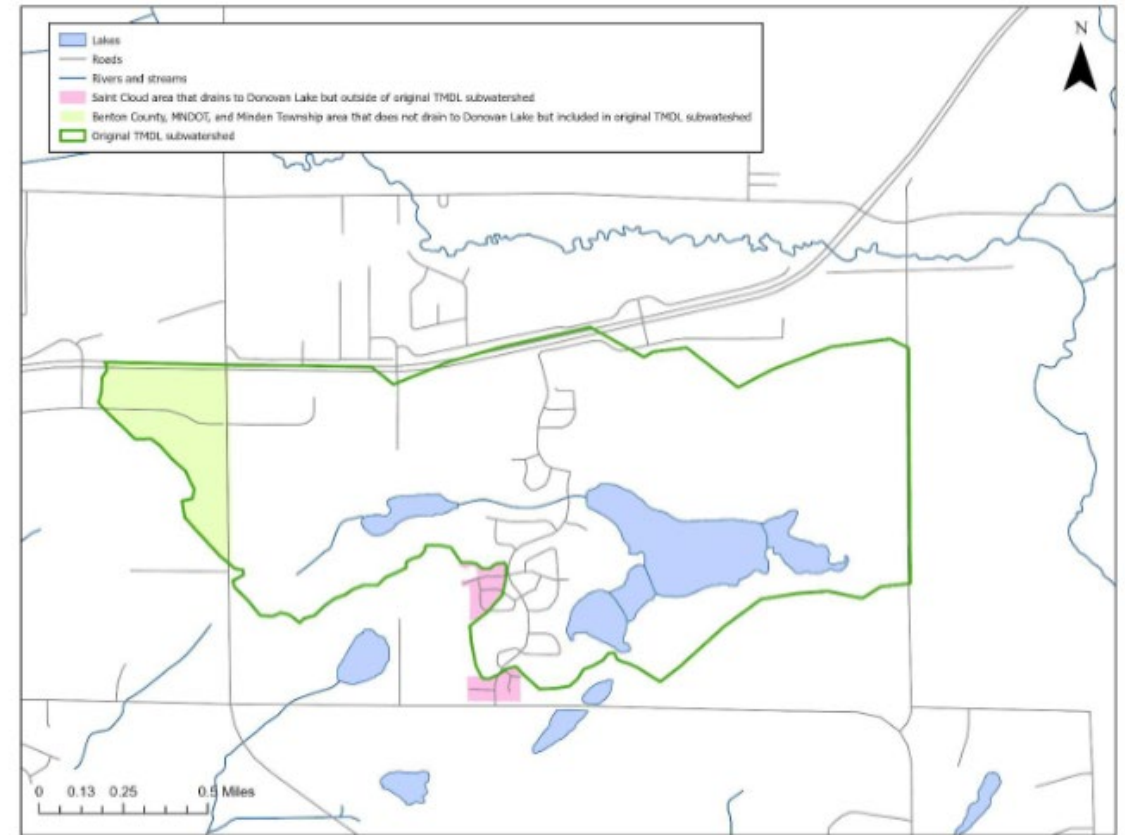
- In progress; to be done in advance of reissuance of next MS4 permit
- More MS4s and more TMDL reports involved compared to last time
- WLA transfer memos will provide information to eliminate the need for future transfers (i.e., WLA pollutant loading rates to apply to changes in regulated area)
- Communication with EPA on approach
- Public notice? Formal EPA approval?



*Some of the newly regulated MS4s that need WLAs in approved TMDLs*

# Donovan Lake TMDL Revision (2024)

- Lake watershed boundary corrected: BMP credit for MS4 WLA
- Also: 2020 Census info, MS4 WLA approach
- TMDL changes: no change in loading capacity, transferred LA to WLA
- Memo for PN: what is being changed and why; original and revised TMDL table
- EPA issued revised decision document



# Errors

Original TMDL	Revision date	Description	Documentation	PN	EPA DD	Webpage
Redwood R Fecal Coliform (2014)	2023	Arithmetic errors in one allocation table	"TMDL errata sheet" (2 pg) describes changes	N	Y	Revised original approval letter PDF (replaced old one): Original approval letter, revised letter, revised DD, TMDL errata sheet
Miss R–Grand Rapids (2019)	2025	WWTP WLA errors in 3 <i>E. coli</i> TMDLs	"TMDL revision" (7 pages)	Y	Y	TBD: Will be posted
Root R TMDL (2017)	2025	Errors and inconsistencies in multiple TSS & <i>E. coli</i> WLAs and TMDLs	"Revision of Root River TMDLs" (18 pages)	Y	Y	TBD: Will be posted



- WLA needed for WWTP that had been upstream of a TMDL boundary condition
  - Lesson learned: do not use a BC (no allocations) for an impaired water without a TMDL.
- New TMDL target
  - P TMDL originally for DO impairment; new nutrients impairment
  - Numeric P criteria adopted after original TMDL

Revised TMDL  
completely replaces  
the older TMDL

# Process overview

- Work with Stormwater and Wastewater Program
- Revision memos instead of updating original report (some exceptions)
- Communication with EPA: planning, submittal letter, notification vs. approval
- Public notice or not
- Post online



# Thank you!

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