2026 Modification to Mississippi River-St. Cloud Watershed Total Maximum Daily Load Report 2024

GENERAL INFORMATION

TMDL project name	Mississippi River-St. Cloud Watershed Total Maximum Daily Load Report 2024
Date of original EPA TMDL Approval	August 27, 2024
TMDL Modification Public Notice Dates	January 5, 2026- February 4, 2026
TMDL Assessment Unit Identification (AUID) and pollutant that requires modification	07010203-528 – Total Suspended Solids (TSS)
TMDL tables being modified	Table 58. Permitted MS4s and estimated regulated area for the Unnamed creek (-528) TSS TMDL Table 59. TSS TMDL summary, Unnamed creek (AUID 07010203-528)

EXPLANATION OF MODIFICATION

What is being changed from the final Total Maximum Daily Load (TMDL) to the modified TMDL?

The Minnesota Pollution Control Agency (MPCA) is making adjustments to Municipal Separate Storm Sewer Systems (MS4s) wasteload allocations (WLAs) to account for one new permittee and regulated area changes for transportation MS4s (per the 2020 Decennial Census urban area with population over 50,000). The adjustments will not change the approved overall total loading capacities of the TMDL.

Given the modification described, are there any changes to Stormwater Pollution Prevention Programs (SWPPPs) to account for the modified WLAs? When will the SWPPPS be updated?

Permitted MS4s with assigned WLAs (Table 2) will be required to account for the TSS impaired Unnamed Creek (Otsego) reach (Table 1) in their SWPPPs when the MS4 General Permit is reissued.

- Wright County MS4 will be required to submit a SWPPP when they apply for permit coverage (expected in 2027).
- Current MS4 permittees will be required to submit updated SWPPPs when they apply for permit coverage under the re-issued MS4 General Permit (expected in 2026).

Table 1. Water body and impairment requiring modifications.

AUID	Reach Name	Impairment	Baseline year
07010203-528	Unnamed Creek (Otsego)	TSS	2019

Table 2. Currently regulated, newly regulated, and terminated MS4s within the TMDL subwatershed. Additions underlined.

Regulated MS4	MS4 Permit #	07010203-528
Albertville City MS4	MS400281	X
MnDOT Outstate District MS4	MS400180	X
Otsego City MS4	MS400243	X
Saint Michael City MS4	MS400246	X
Wright County MS4	MS400164*	X

*proposed permit number

Explanation of modifications:

- There is one newly regulated MS4: Wright County (proposed permit number MS400164) (Table 2). When the TMDL was approved on August 27, 2024, any stormwater contribution from Wright County was assigned to WLAs for other regulated MS4s in the impairment subwatershed. Because it has been determined that Wright County will now be a regulated MS4 under the next MS4 General Permit, the MS4 WLAs are being re-distributed to account for the re-classified area for the Wright County MS4.
- WLAs for MS4s named in the original TMDL were also adjusted to accommodate the expanded MS4 regulated area per the 2020 Decennial Census large urban area for MnDOT Outstate and Wright County MS4s (Modified Table 58). Adjustments include WLA to WLA.

Transfer Methodology and rates:

- For city and township MS4s: WLAs were calculated by multiplying the jurisdictional area within the TMDL subwatershed by the transfer rate (Table 3 and Modified Table 58).
- For county and MnDOT MS4s: WLAs were calculated by multiplying regulated area per 2020 Decennial Census Urban Area with population over 50,000 within the TMDL subwatershed by the transfer rate (Table 3 and Modified Table 58).
- The rates in Table 3 were calculated as the sum of the MS4 WLAs in each flow zone divided by the sum of the MS4 WLA area.

Table 3. Transfer rates for WLA modifications.

AUID - impairment	Very High	High	Mid-Range	Low	Very low	Units
528 - TSS	0.3695	0.1666	0.0994	0.0643	0.0353	lbs/ac/day

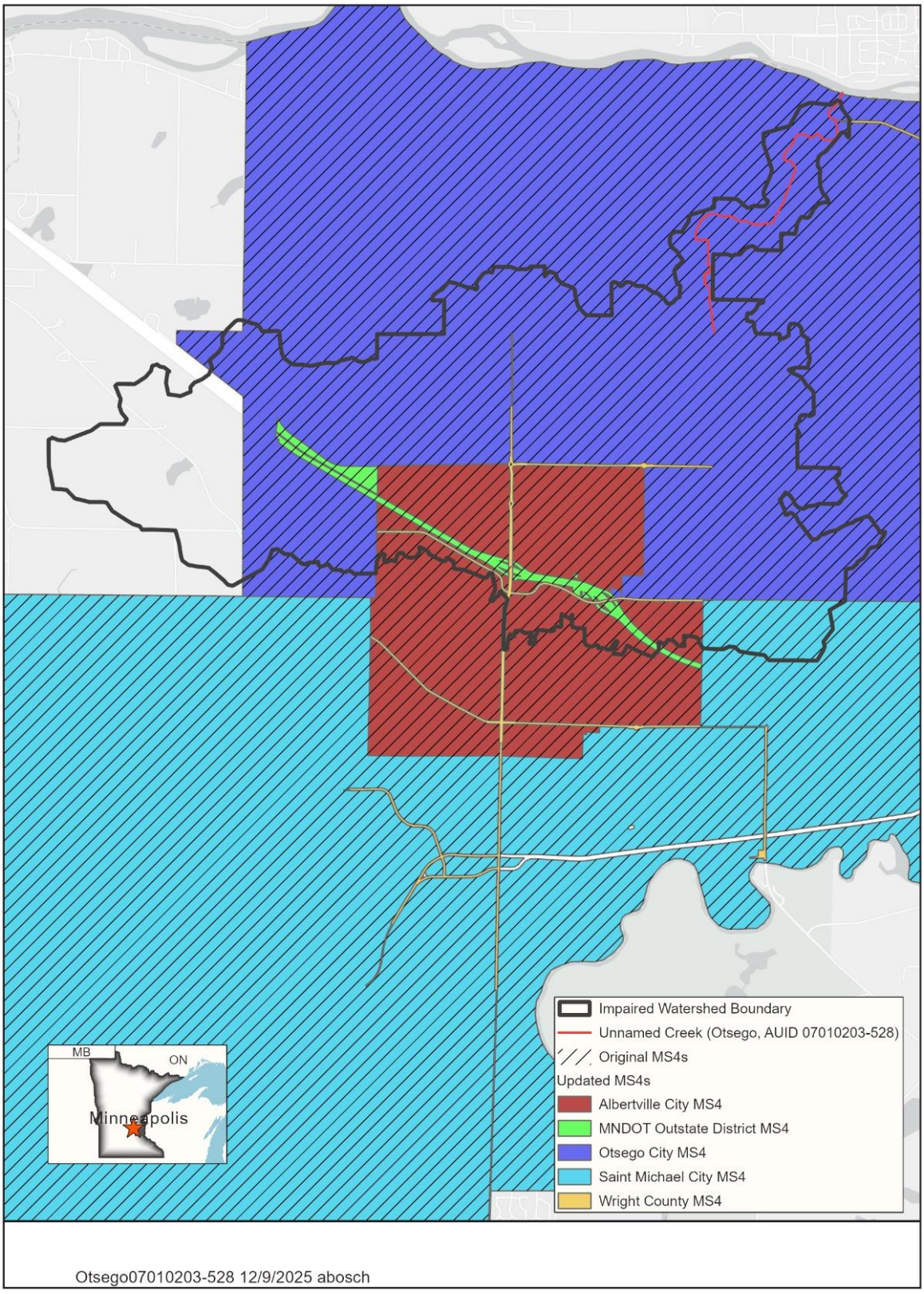
The MPCA is proposing the following modifications:

Unnamed Creek (Otsego), AUID 07010203-528

The MPCA is shifting between 0 and 41.1 tons/day of TSS amongst all MS4s and flow zones from within the original MS4 permittees' WLAs (Modified Table 59).

MAPS

Figure 1. Unnamed Creek (Otsego) (AUID 07010203-528) TSS TMDL Subwatershed and Regulated MS4 Areas.



TABLES

Original Table 58. Permitted MS4s and estimated regulated area for the Unnamed Creek (-528) TSS TMDL (Page 97 of TMDL report).

MS4 name and permit number	Estimated WLA area (acres)
Albertville City (MS400281)	1,326.4
MNDOT Outstate District (MS400180)	54.7
Otsego City (MS400243)	4,882.7
Saint Michael City (MS400246)	248.0

Modified Table 58. Permitted MS4s and estimated regulated area for the Unnamed Creek (-528) TSS TMDL (modifications highlighted in yellow).

MS4 name and permit number	Estimated WLA area (acres)
Albertville City (MS400281)	1,228.2
MNDOT Outstate District (MS400180)	165.5
Otsego City (MS400243)	4,789.8
Saint Michael City (MS400246)	247.9
Wright County MS4	80.4

Original Table 59. TSS TMDL summary, Unnamed creek (AUID 07010203-528) (Page 102 of TMDL report).

TMDL Parameter		Flow Zones				
		Very high	High	Mid-range	Low	Very low
Sources		TSS load (pounds per day)				
Wasteload	Otsego WWTP West (MN006257)	180	180	180	180	180
	MNDOT Outstate District MS4 (MS400180) [a]	20	9.1	5.4	3.5	1.9
	Otsego City MS4 (MS400243) [a]	1,804	814	485	314	172
	Saint Michael City MS4 (MS400246) [a]	92	41	25	16	8.7
	Albertville City MS4 (MS400281) [a]	490	221	132	85	47
	Industrial stormwater	42	19	11	7.9	4.0
	Construction stormwater	5.6	2.5	1.5	0.97	0.53
	Total WLA	**2,634**	**1,287**	**840**	**607**	**414**
Load	**Total LA**	**331**	**150**	**88**	**57**	**31**
	MOS	**329**	**160**	**103**	**74**	**50**
	Total load	**3,294**	**1,597**	**1,031**	**738**	**495**
Maximum observed (mg/L)		**33.2**				
Overall estimated percent reduction		**10%**				

[a] To evaluate compliance with the TSS TMDL WLA, MS4 permittees should use the 10% reduction target from their baseline loads in 2019 (Section 8.1.3.2).

Modified Table 59. TSS TMDL summary, Unnamed creek (AUID 07010203-528) (modifications highlighted in yellow).

TMDL Parameter		Flow Zones				
		Very high	High	Mid-range	Low	Very low
Sources		TSS load (pounds per day)				
Wasteload	Otsego WWTP West (MN006257)	180	180	180	180	180
	MNDOT Outstate District MS4 (MS400180) [a]	61.1	27.6	16.4	10.6	5.8
	Otsego City MS4 (MS400243) [a]	1769.8	798.2	476.2	307.8	168.9
	Saint Michael City MS4 (MS400246) [a]	91.6	41.3	24.6	15.9	8.7
	Albertville City MS4 (MS400281) [a]	453.8	204.7	122.1	78.9	43.3
	Wright County MS4	29.7	13.4	8.0	5.2	2.8
	Industrial stormwater	42	19	11	7.9	4.0
	Construction stormwater	5.6	2.5	1.5	0.97	0.53
	Total WLA	**2,634**	**1,287**	**840**	**607**	**414**
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Reasonable Assurance

The MPCA is responsible for applying federal and state regulations to protect and enhance water quality in Minnesota. The MPCA oversees stormwater management accounting activities for all permitted MS4 entities listed in this TMDL modification. The MS4 General Permit requires regulated municipalities to implement best management practices (BMPs) that reduce pollutants in stormwater to the maximum extent practicable. A critical component of permit compliance is the requirement for the owners or operators of a permitted MS4 conveyance to develop a SWPPP. The SWPPP addresses all permit requirements, including the following six measures:

- Public education and outreach
- Public participation
- Illicit discharge detection and elimination program
- Construction site runoff controls
- Post-construction runoff controls
- Pollution prevention and municipal good housekeeping measures

A SWPPP is a management plan that describes the MS4 permittee's activities for managing stormwater within their regulated area. The TMDL report and this modification assign WLAs to permitted MS4s in the study area. The MS4 permit requires applicants to submit information at the time of application on applicable WLAs. They must document how they will make progress on performance-based WLAs (bacteria, chloride, temperature), demonstrate they are currently meeting their numerical WLAs (oxygen demand, nitrate, total phosphorus, or TSS), or develop a compliance schedule for those numerical WLAs that are not being met. A compliance schedule includes BMPs that will be implemented over the permit term, a timeline for their implementation, and a long-term strategy for continuing progress towards assigned WLAs. The MPCA requires MS4 owners or operators to submit their application and corresponding SWPPP document to the MPCA for review. Once the application and SWPPP are deemed complete by the MPCA, all application materials are placed on 30-day public notice, allowing the public an opportunity to review and comment on the prospective program.

Progress on BMP implementation must be reported annually. For WLAs being met at the time of permit application, the same level of treatment must be maintained in the future. Regardless of WLA attainment, all permitted MS4s are still required to reduce pollutant loadings to the maximum extent practicable.

The MPCA's stormwater program and its NPDES/SDS permit program are regulatory activities providing reasonable assurance that implementation activities are initiated, maintained, and consistent with WLAs assigned in this study.

Several nonpermitted reduction programs exist to support implementation of nonpoint source reduction BMPs in the Mississippi River – St Cloud Watershed. Per the spending for water quality implementation projects website (data compiled by MPCA: Spending for water quality implementation projects), 75 million dollars in state and federal grants, loans, local government and landowner cost share match have been spent on nonpoint source projects since 2004. Efforts to reduce nonpoint source pollution loading will continue.

Implementation

This TMDL modification assigns an applicable TSS WLA to Wright County MS4. This will result in MS4 permit requirements for Wright County MS4. All of the permitted MS4s named in Table 2 have TSS WLAs requiring reductions in this TMDL. The TSS WLAs have been adjusted incrementally for existing permittees in Table 2, which should not affect their future WLA determinations during MS4 permit application, as the TMDL target for this reach is a 10% reduction and not a mass load.

Permittees can reference the Stormwater Manual for more information: Total Suspended Solids (TSS) in stormwater | Minnesota Stormwater Manual and Making WLA determinations | Minnesota Stormwater Manual

Prior to implementation, permitted MS4s are encouraged to compare their sewersheds (e.g., catchments, pipesheds, etc.) with the drainage areas for each impaired water body to ensure appropriate BMP crediting. If a permitted MS4 sewershed is different from what is defined as the drainage area in this report, the sewershed should be considered part of the MS4 contribution to the impaired water if sufficient evidence of the appropriate sewershed area is provided to the MPCA. With Agency approval, any wasteload-reducing BMP implemented since the TMDL baseline year within the

sewershed will be creditable towards an MS4's load reduction for purposes of annual reporting and demonstrating progress towards meeting the WLA(s).

Projects undertaken recently may take a few years to influence water quality. Any wasteload-reducing BMP implemented after the baseline year (Table 1) will be creditable toward the MS4's load reductions. If a BMP was implemented during or just prior to the baseline year, the MPCA is open to presentation of evidence by the MS4 permit holder to demonstrate that it should be considered as a credit.