

EPA and DEQ Required Elements of a TMDL

- **Submittal Letter** – discusses the outcomes of assessed water bodies in the HUC and those that TMDL's have been written. Usually identifies those water bodies that DEQ will seek to de-list because we've determined they are meeting the beneficial uses.
- **Scope of the TMDL** – describes the water body, pollutant of concern, sources of pollutant, magnitude and location of sources.
- **Applicable Water Standards and Numeric Targets** – includes a description of the states water quality standard including the designated use(s) of the waterbody, the applicable numeric or narrative water quality criterion. If the TMDL is based on a target other than numeric water quality criterion, a description of the process used to derive the target must be included in the submittal.
- **Loading Capacity** – the waterbodies loading capacity must be identified for the applicable pollutant. It should also describe the cause and effect relationship between the identified pollutant sources, the numeric target and the achievement of water quality standards. Supporting documentation such as analytical process, results from modeling, assumptions, etc. Critical conditions must be considered as part of the analysis of loading capacity.
- **Wasteload Allocations (WLAs)** – EPA regulations require that a TMDL include WLAs that identify the portion of the loading capacity allocated to existing and future point sources. WLAs must be assigned to each point source discharging the pollutant of concern. If there are no point sources then the WLA is typically expressed as Zero.
- **Load Allocation (LAs)** – EPA regulations require that a TMDL include LAs that identify the portion of the loading capacity allocated to existing and future nonpoint sources and to natural (non anthropogenic) background.
- **Margin of Safety** – Statute and regulations require that a TMDL include a margin of safety to account for any lack of knowledge concerning the relationship between load and wasteload allocations and water quality. The MOS may be implicit or explicit. If the MOS is implicit, the conservative assumptions in the analysis must be described. If the MOS is explicit, the loading set aside for the MOS must be identified, typically in percent.
- **Seasonal Variation** – statute and regulations require that a TMDL be established with consideration of seasonal variation. The method chosen to describe seasonal variation must be described.
- **Monitoring Plan** – a monitoring plan is recognized as an integral component of a TMDL. Idaho's TMDL Settlement Agreement requires discussion of monitoring within the TMDL document. EPA recognizes the role of adaptive management in TMDL development and that monitoring plans and monitoring will inform future decisions on progress being made toward attaining water quality standards and beneficial uses.
- **Implementation Plans** – implementation plans should be developed within 18 months of EPA approval of the TMDL. Furthermore, an implementation plan strategy must be incorporated into the TMDL document.
- **Reasonable Assurance** – when a point source is given a less stringent wasteload allocation based on assumptions that a non point source will achieve reductions, then it must be explained how this will happen.
- **Public Participation** – EPA and DEQ require public review consistent with State's continuing planning process and public participation requirements. WAGs and BAGs are one component of public participation. However, other publics and agencies participate and provide input.