



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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Matthew J. Frank, Secretary
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January 22, 2010

William W. Streeter, Vice Chancellor
University of Wisconsin - Parkside
P.O. Box 2000
Kenosha, WI 53141

Subject: Municipal Storm Water Discharge Permit – Pollutant Loading Analysis

Dear Mr. Streeter:

In accordance with Section 2.7.3 of WPDES Municipal Separate Storm Sewer System General Permit No. WI-S050075-1, University of Wisconsin - Parkside (UW Parkside) was required to conduct and submit a pollutant load analysis to the Department. The Department has reviewed the pollutant load analysis and has determined that UW Parkside is in compliance with the Stage 1 requirement of s. NR 151.13, Wis. Adm. Code (i.e., 20% total suspended solids reduction). However, it appears that the pollutant loading analysis will need to be revised for the assessment of compliance with the Stage 2 requirement (i.e., 40% total suspended solids reduction). Specific items that will need to be addressed in the Stage 2 assessment of compliance are as follows:

- A significant amount of undeveloped area was included in the pollutant loading analysis. In accordance with the Department's MS4 modeling guidance, undeveloped areas should not be included in the pollutant loading analysis.
- Swale conveyance systems should be evaluated and analyzed in accordance with the Department's MS4 swale modeling guidance. It appears that some drainage basins will need to be subdivided and modeled by conveyance system type (i.e., separate model runs for swale areas vs. storm sewer areas).
- The pollutant loading analysis indicates that all rooftops, parking lots, driveways and sidewalks are disconnected. Typically, only a portion of these source areas can meet the Department's criteria for disconnection. The actual level of disconnection for each source area should be determined by field verification in accordance with the Department's MS4 modeling guidance.
- The pollutant loading analysis assumes that all areas within Sub-basin #6 are draining directly to a wet detention basin for treatment. However, it appears that a significant portion of the developed area within Sub-basin #6 drains to a wetland. The drainage areas associated with the wetland and the wet detention pond should be determined and evaluated separately.

Feel free to call me at (262) 884-2360 if you have any questions.

Sincerely,

Peter C. Wood, P.E.
Water Resources Engineer

CC: Jim Bertolacini - DNR WT/3
Tom Bittner - UW