

ISSUE—HOW TO REFLECT SEPTIC TANK LOAD REDUCTIONS IN THE LAKE JESUP PHOSPHORUS ALLOCATION TABLE

The Question: How should septic tank reductions identified in the Jesup TMDL be allocated in the BMAP?

BMAP Solution:

- **CALCULATIONS:** Surface water reductions will be allocated on a surface runoff load-weighted basis (no change). Septic tank required reductions identified in the TMDL (1.5 MT TP) will be allocated on a surface runoff load-weighted basis, but only to those jurisdictions that have authority over land use decisions that control the extent, density, and location of septic tanks in the watershed (i.e. cities and counties).
- **ALLOCATION TABLE:** The allocation table will contain one overall load allocation and reduction responsibility per entity. These values would combine stormwater and septic tank reductions into a single value for each entity, as applicable.
- **DATA REVISION:** The development of septic tank GIS layers and related information will be included as BMAP management actions to support refinement of the TMDL in the second iteration.

Background:

- The method used to estimate septic tank loads in the TMDL resulted in identification of a 1.5 MT (3307 lb) TP reduction needed (see Section 4.2.2.3.F of the TMDL for more details). This reduction was based on loads from properly functioning septic tanks located near surface waters and included a soil attenuation factor.
- The total load reduction obligation for Lake Jesup BMAP allocation entities consists of three parts: MS4 stormwater, non-MS4 stormwater, and septic tanks. The proposed solution leaves each allocation entity with the flexibility to address their load reduction through stormwater projects, regional projects, septic tank/wastewater infrastructure projects or other measures as appropriate for their circumstance.
- The BMAP-MS4 permit linkage is based on projects, not the allocation numbers. Within the BMAP, only those urban stormwater projects that are applicable to the MS4 permit would be linked to the MS4 permit. Septic tank management and non-MS4 stormwater projects would not be linked to the MS4 permit but would be given credit toward meeting an entity's BMAP required reduction and would be considered obligations under the BMAP.