

Wilson Creek in Missouri  
Draft Total Maximum Daily Load (TMDL)  
SUMMARY OF COMMENTS AND RESPONSES  
Prepared by the U.S. Environmental Protection Agency (EPA),  
Region 7, Water, Wetlands and Pesticides Division  
January 2011

## INTRODUCTION

EPA public noticed a draft TMDL for Wilson Creek (with Jordan Creek), identification numbers MO-2375 and 3374, from August 27 to September 30, 2010. EPA is establishing this TMDL to meet the obligations of the 2001 Consent Decree, *American Canoe Association, et al. v. EPA*, Consolidated Case No. 98-1195-CV-W-SOW, consolidated with 98-4282-CV-W-SOW (Consent Decree). This document summarizes and paraphrases comments received, EPA's response to comments and changes made to the final TMDL where appropriate. Included is a list of all commentors.

## RESPONSE TO COMMENTS (EPA responses in bold)

1. Comment: The commentor requested to review the TMDL before it was public noticed because they were named as a primary contributor of storm water flow and because the implementation plan will be enforced through Municipal Separate Storm Sewer System (MS4) permits.

**1. Response: EPA agrees that there should be full and meaningful public participation in the TMDL development process from those impacted by the TMDL (40 Code of Federal Regulations (CFR) § 130.7(c)(1)(ii) and 40 CFR § 130.7(d)(2)).<sup>1</sup> The public participation comes with the public notice period and offers the opportunity for meaningful review. All comments received during public notice are considered and addressed in the final TMDL as is appropriate. Missouri Department of Natural Resources (MDNR) will work with permitted facilities identified in the TMDL as per EPA regulations, ...*the state shall incorporate them [the TMDLs] into its current [Water Quality Management] WQM plan [for implementation] (40 CFR § 130.7(d)(2)). MDNR provided the implementation plan which EPA included in Appendix E as an informational tool for watershed stakeholders. The Wilson Creek TMDL is a phased and adaptive plan to restore water quality conditions in the Wilson Creek watershed.***

**The conversion of wasteload allocations (WLAs) to permit limits is the purview of the MDNR National Pollutant Discharge and Elimination System (NPDES) Permits and Engineering Section. Should you have questions regarding the determination of permit effluent limits, please contact Mr. Refaat Mefrakis, Chief, NPDES Permits and Engineering Section, at (573) 526-2928 or via email at [refaat.mefrakis@dnr.mo.gov](mailto:refaat.mefrakis@dnr.mo.gov).**

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<sup>1</sup> *Guidelines for Reviewing TMDLs under Existing Regulations issued in 1992*, EPA, May 20, 2002

2. Comment: Thirty days of public notice places a burden on agencies and citizens because of its short response time. The commentor felt that stakeholders were especially burdened by having two TMDLs on public notice at the same time that impacted their city and county.

**2. Response: Per EPA regulations, public notice should follow the state's public review process as defined in the state's Continuing Planning Process (CPP) (40 CFR § 130.7(a), 40 CFR § 130.7(c)(1)(ii) and 40 CFR § 130.7(d)(2)). Missouri's most current CPP defines a 30 day public notice period distributed to all known stakeholders impacted by the TMDL. (Missouri's most current CPP is found at [http://www.dnr.mo.gov/env/wpp/cpp/cpp\\_toc.htm](http://www.dnr.mo.gov/env/wpp/cpp/cpp_toc.htm)) To distribute the draft TMDL as widely as possible, EPA publishes the draft TMDL on its Website ([http://www.epa.gov/region07/water/tmdl\\_public\\_notice.htm](http://www.epa.gov/region07/water/tmdl_public_notice.htm)) and concurrently MDNR notifies stakeholders on its Website (<http://www.dnr.mo.gov/env/wpp/tmdl/wpc-tmdl-progress.htm>). When the draft TMDL is posted on the Websites, EPA and/or MDNR sends timely notice by mail and/or email to all identified point source facilities, non-point source entities, watershed stakeholders, community groups, elected representatives, cities, townships and counties that are part of the impaired watershed or have indicated previous interest in the impaired water's TMDL to notify them of the posting.**

3. Comment: Due to deficiencies (mentioned in subsequent comments) the commentor believes the TMDL should have very limited applicability in the future without a significant amount of additional study and refinement.

A similar comment concerns water management in urban environments as an evolving science: the commentor asks that the Wilson Creek TMDL be flexible enough to change course or adapt new water quality improvement ideas as they are tried and tested.

**3. Response: Please refer to responses below that address each specific issue. EPA encourages the collection of additional data, in fact one of the hallmarks of the TMDL process is adaptive management or implementation. Adaptive implementation is an iterative process that makes progress toward achieving water quality goals while using any new data and information to reduce uncertainty and adjust implementation activities. The data will need to meet the minimum level that MDNR considers for use in determining TMDL targets and modeling. The data needs to be representative of instream conditions and meet the Quality Assurance/Quality Control levels of Missouri's Listing Methodology document (10 CSR 20-7.031 and 10 CSR 20-7.050). If data provided by any of the commentors or future monitoring is found to meet MDNR's minimum level for data inclusion, MDNR may consider submitting a revised or modified TMDL for this water at any time based on this or other data.**

**Regarding evolving science and data for Wilson/Jordan Creeks, at any time the state may submit and EPA may approve a revised or modified TMDL for any water. The TMDL is being completed at this time to meet consent decree**

requirements. The data being used are the best available. One of the hallmarks of the TMDL process is adaptive management or implementation. Adaptive implementation is an iterative process that makes progress toward achieving water quality goals while using any new data and information to reduce uncertainty and adjust implementation activities. As more data becomes available, MDNR may use the new information available to assist stakeholders in appropriately targeting the next suite of implementation activities.

4. Comment: Figures 4 and 6 are missing most of the map graphics.

**4. Response: Thank you for your comment. Map graphics have been corrected in the final TMDL.**

5. Comment: The aquatic invertebrate data that was used to place the stream on the 303(d) List should be included in an appendix to understand the degree of impairment. It would be beneficial if the water quality data in Appendix A were compared to Water Quality Standards (WQS) or benchmarks that would relate the levels to aquatic invertebrate health to determine if any specific pollutants are possibly contributing toward the toxicity.

**5. Response: While the listing of this water body as impaired is beyond the scope of this specific TMDL public notice, all data used to list a water during any Missouri 303(d) listing cycle would be available on file with MDNR. Water quality monitoring has not revealed an exceedance of a specific numeric water quality criterion in Wilson/Jordan Creeks. However, all Missouri streams are protected by the General Criteria contained in Missouri's WQS at 10 CSR 20-7.031(3). Please read Response 6 for a more detailed explanation of the relationship between aquatic invertebrate health and the toxicity in Wilson/Jordan Creeks. Data used in the TMDL's calculations not in the draft TMDL is being placed into STORET for better data sharing. Please refer to Response 7 for more information on STORET.**

6. Comment: There is a lack of a defined stressor-effect relationship because the draft TMDL does not establish causality between storm water flow and beneficial use attainment. The TMDL does not provide any assurance that benthic macroinvertebrate metrics or habitat will positively respond to decreased storm water flow. Page 31 of the TMDL provides too general a summary of biological and habitat data and it is difficult to determine whether the data support the TMDL's assumption that storm water flow results in a decrease in community health and stream habitat. The TMDL lacks the specific data and analysis to support that hydrological changes have degraded habitat. Although MDNR's habitat assessment is not designed as a stand-alone product to identify specific sources of habitat degradation, the TMDL uses MDNR's assessment to reach that conclusion.

A similar comment addresses the relationship between hydrology and the impact on aquatic invertebrate communities: The aquatic invertebrate indices of the reference streams should be provided. The TMDL assumes that the Flow Duration Curves must be

matched to achieve acceptable water quality? Is this really true? Could the Flow Duration Curve of Wilson be improved to a lesser degree and still achieve water quality goals? More information needs to be provided in the TMDL so that the entities affected by the TMDL can more fully understand the level of flow control that is really necessary to achieve goals.

**6. Response: National studies (Center for Watershed Protection (CWP), 2003; Water Environment Research Foundation, 2003) have documented the connection between increased impervious area in urban areas to increases in storm water runoff which contribute numerous pollutants and changes in hydrology with increased magnitude, duration and frequency of storm water flows. These resulting changes are known to negatively affect water quality and aquatic life.**

**As stated in the TMDL, the CWP study reviewed hundreds of research studies. The combined review and synthesis of information in these studies led CWP to conclude that impervious cover as low as 10 percent can be related to aquatic life impairments and worsens as more areas within the watershed are developed.**

**The TMDL data and local studies support the negative effects on water quality from urbanization within a watershed with decreasing trends and very low diversity of fish and aquatic invertebrates in Wilson/Jordan Creeks. In addition, they found low levels of pesticides, metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs) and volatile organic compounds (VOCs) in water and semi-permeable membrane device (SPMD) samples in Wilson/Jordan Creeks and other urban streams near Springfield, Missouri. The TMDL also documents the storm water impacts to the hydrology as described in the literature with increased magnitude, frequency and duration of higher flows and lower low flows.**

**Reducing the frequency and magnitude of high flows will encourage infiltration so that the stream hydrology more closely matches pre-development hydrology as measured in the reference stream watersheds. In turn this will reduce the amount of pollutants carried by storm water runoff into Wilson/Jordan Creeks. Based upon the analysis by national and local studies, it is reasonable that addressing these negative impacts will result in better habitat and protection of aquatic life and natural biological aquatic communities.**

7. Comment: Graphs (Figure 15 and 16) show the full range of flow as though the goal is to match the entire FDC. It would be much more clear if only the higher 10 percent flows were shown on the FDC's and WLA graphs.

A similar comment is that Tables 5 and 6 refer to the impaired watershed which is misleading because it's the stream that's impaired, not the watershed.

A similar comment is that data in Appendix A appear to be missing critical metadata (detection limits, parameter codes, sampling locations, etc). The lack of metadata makes interpretation unclear and limits any useful analysis.

Two similar comments is that Section 4.4.2 mentions historical sampling which identified pollutants including total suspended solids, turbidity and nutrients, all pollutants commonly found in agricultural run-off. The source of Table 10's data is unclear. These samplings should be presented in the TMDL.

Another similar comment is that the commentor requests that raw data and sources be included in the TMDL.

**7. Response: Graphs and data in the draft TMDL has been analyzed and presented consistent with the procedures included in Appendices A, C, D and E; 40 CFR § 130.2(i) and 40 CFR § 130.7(c)(1). Graphs 15 and 16 report the daily flows that are the WLA for all percent flows. All potential sources to the impaired waters are considered when setting a TMDL and as such all land use in the impaired water's watershed is analyzed as represented in Tables 5 and 6. Table 10 is the summary of MDNR's historical data. The sources for all raw data used in the draft TMDL are listed in the References Section. Additionally, all data used to list a water during any Missouri 303(d) listing cycle is on file with MDNR. The commentor is directed to the Appendices cited at relevant points in the body of the TMDL to find specific data and further analyses. Data used in the TMDL's calculations not in the draft TMDL is being placed into STORET for better data sharing. The STORET Data Warehouse is EPA's repository of the water quality monitoring data collected by water resource management groups across the country. The new water quality exchange (WQX) makes uploading data to STORET easier so more groups are able to share data. Please access data for this TMDL at the following Website: [http://www.epa.gov/STORET/dw\\_home.html](http://www.epa.gov/STORET/dw_home.html). Assistance on using STORET is available at <http://www.epa.gov/STORET/owners.html>.**

8. Comment: The draft TMDL is very confusing in addressing the MS4 permits of the city of Springfield and Greene County. References throughout the document vary in how these permits are used and described. Nowhere is there any determination of the respective areas within both the city and county MS4 permit area nor has any attempt been made to estimate the approximate contribution of flow or pollution from the respective areas. (Specifically: on page 15 it states the Greene County MS4 covers the Springfield urban area but does not mention the Springfield MS4, and in Table 7 entitled Permitted Facilities in the Wilson Creek Watershed, lists the Greene County small MS4 but does not list the Springfield large MS4 and in Section 3.1.1 the city MS4 permit's boundary is wrong.)

**8. Response: In Section 3.1.1's first paragraph, the urban area around Springfield, Missouri, is referenced as the MS4 area regulated under Phase I of the program. This boundary area is correct, per the permit. In regards to the commentor's concern about approximating contribution of flow between the MS4s, EPA acknowledges the difficulty in discerning regulated from non regulated storm water discharges from Wilson/Jordan Creeks' sources. It may be reasonable to express allocations for NPDES-regulated storm water discharges from multiple point**

**sources as a single categorical WLA when data and information are insufficient to assign each source or outfall individual WLAs 40 CFR § 130.2(i).**

9. Comment: The commentor states that the TMDL's estimated percent of impervious cover is subject to error due to inconsistencies between aerial photos, MoRAP data, previous studies and city data.

**9. Response: TMDLs are calculated to attain WQS with a MOS which takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality, such as the inconsistencies listed in the comment (40 CFR § 130.7(c)(1)). This TMDL is established with an implicit MOS by using conservative assumptions during the development of the target flow duration curve. By meeting the conservative high flow targets defined in this TMDL, the physical impact of stream flow will be mitigated by reducing high flows and augmenting low flow periods, please refer to section 7 of the TMDL for a more detailed explanation.**

10. Comment: There are readily available data from local agencies to better assess the number of on-site wastewater treatment systems. The number of systems may be underestimated in the TMDL due to rural areas and subdivisions not on public sewer systems. The failure rate of these systems is higher than estimated in the TMDL.

**10. Response: All pollutants preventing or expected to prevent WQS attainment (and their sources) are listed in the TMDL, per 40 CFR § 130.7(c)(1)(ii). Referring to Section 3.2.3 of the draft TMDL, the TMDL's assumptions take into account the rural areas in the watershed. Little information was identified that would suggest failing onsite wastewater systems are a significant problem in the watershed. In the same Section, the TMDL specifically mentions that the TMDL's assumptions take into account the rural areas in the watershed. If better data is made available, Missouri may submit, and EPA may approve, a revised or modified TMDL for this water at any time.**

11. Comment: The draft TMDL shows an unfounded bias toward building a case for urbanization being the sole primary cause of impairment. The following examples were provided by commentors: Table 1 highlights urban sources as opposed to categorizing all significant sources including agriculture? Why are agricultural practices not mentioned as a potential source of toxic contaminants? Isn't it biased to say that impaired stream habitat is caused by "Increased urban runoff volume" as opposed to increased runoff? Showing "Riparian land cover alteration" as being related to impervious area is incorrect when 80 percent of the unforested area along the stream is agricultural in nature rather than urban. How can it be concluded that this condition is associated with impervious area?

**11. Response: In the case of Wilson and Jordan Creeks the pollutant causing the impairments may be listed as unknown on the 303(d) List, however, data indicates that toxicity from multiple pollutants carried by storm water is the cause of the impairment. The amount of storm water running into Wilson and Jordan Creeks**

has increased significantly due to an increase in impervious surfaces in the watershed. The increase in impervious surfaces is the result of development in the watershed. Therefore, using a surrogate that represents the toxic pollutant loadings to the stream, as well as the hydrologic conditions that are also found to be contributing to the impairment is appropriate and addresses both chemicals and habitat degradation.

EPA's regulations state that TMDLs can be expressed in several ways, including in terms of toxicity, which is a characteristic of one or more pollutants, or by some other appropriate measure (40 CFR § 130.2(i)). They also state that TMDLs may be established using a biomonitoring approach as an alternative to the pollutant by pollutant approach (40 CFR § 130.7(c)(1)(i)). While urban areas are expected to be the major contributors to storm water (and pollutant) loadings, non-urban and agricultural sources are also discussed in the TMDL. Urban areas are more likely to contain impairing pollutants from anthropogenic sources which are concentrated in these areas.

12. Comment: On Figures 9 and 10, the label of the x axis should be clarified. Percent exceedence is often calculated as annual exceedence but in this case it would appear it is a daily average and, therefore, the label should be Percent Daily Exceedence.

**12. Response: Thank you for your comment, the x-axis labels have been corrected in the final TMDL. The figures referenced in the comment are now Figures 8 and 9 in Section 4.4.3.**

13. Comment: There are several comments regarding the reference stream approach and the specific reference streams used. The land use is far too dissimilar to use the reference stream flow characteristics as a realistic goal for Wilson Creek.

**13. Response: The reference streams used in the TMDL are from the same ecological drainage unit (EDU) as Wilson/Jordan Creeks (Ozark/White EDU) and follow MDNR's selection criteria for reference streams, per MDNR's Biological Criteria for Wadeable/Perennial Streams of Missouri, found online at <http://www.dnr.mo.gov/env/esp/docs/BiologicalCriteriaforWadeableStreamsofMissouri.pdf>. Reference streams from the same EDU were chosen to insure reference locations were similar to the impaired stream by virtue of what defines a collection of watersheds in one EDU: common zoogeographical history, physiography and climatic characteristics. The result of these shared characteristics is that watersheds in one EDU share similar distributions of animals, freshwater assemblages, habitats, weather and precipitation. To estimate the reference conditions of Wilson/Jordan Creeks, the synthetic (or representative) flow from the reference streams was derived from the average values of all the individual log transformed flow values (or median of the individual reference streams). Prior to the synthetic flow being derived from the average, all of the flows are normalized based on their respective watershed sizes. Please refer to Section 4.5 which discusses reference watersheds in greater depth and provides reference to additional scientific literature.**

**Furthermore, Section 4.5.2 discusses the choice of the reference streams according to MDNR’s reference stream criteria and applicable WQS (40 CFR § 131).**

14. Comment: There are numerous concerns related to the proposed approach of massive, widespread runoff volume reduction in an urbanized area underlain with Karst geology. One of the primary concerns is pollution of groundwater and private drinking water wells. Also, the TMDL has not considered the effects that increased infiltration would have on accelerating the formation of sinkholes and collapses in the area's Karst geology. It is requested that these potential unintended consequences be clearly stated in the report so all costs and risks can be assessed. It is requested that a variety of Best Management Practices (BMPs) be encouraged using site specific selection criteria that could rule out volume reduction as a feasible solution where particular potential risks are identified.

**14. Response: TMDLs are written to meet surface WQS (40 CFR § 130.7(c)(1)(ii)).**

**Additionally, one of the hallmarks of the TMDL process is adaptive management or implementation. Adaptive implementation is an iterative process that makes progress toward achieving water quality goals while using any new data and information to reduce uncertainty and adjust implementation activities. MDNR will work with permitted facilities identified in the TMDL. The state of Missouri has the authority and responsibility to monitor and assess state waters to ensure protection of the designated beneficial uses. As such, MDNR will incorporate the TMDL into its current water quality management (WQM) plan for implementation and monitoring, per EPA regulations (40 CFR § 130.7(d)(2)). At any time, Missouri may submit, and EPA may approve, a revised or modified TMDL for this water body.**

15. Comment: The commentor is concerned that attainment requirements described in the TMDL are more stringent than those described by MDNR in the 2010 303(d) listing procedures and requests clarification regarding this requirement.

**15. Response: TMDLs are written to meet surface WQS (40 CFR § 130.7(c)(1)(ii)). The listing and designated uses of this water body are beyond the scope of this specific TMDL public notice. Table A of Missouri’s WQS (10 CSR 20-7.031), entitled “Criteria for Designated Uses” identifies the criteria associated with the “Protection of Aquatic Life” use designation.**

16. Comment: In Section 4.2, the TMDL states that Brewery Springs exceeds Missouri’s drinking water and groundwater standards for naphthalene and benzene, yet storm water flow is used as a surrogate target.

**16. Response: Brewery Springs contributes to water quality contamination of Jordan Creek (and Wilson Creek) from unknown sources by exceeding Missouri’s General Criteria Standards (3) (D) and (G) and (3) (B) and (C), found at 10 CSR 20-70.031(3). Sampling on Brewery Springs was performed in response to anecdotal evidence received during the research phase of this TMDL’s development. Brewery**

**Springs sampling showed that benzene and naphthalene concentrations exceeded Missouri WQS for groundwater and drinking water; however, the TMDL is written to address the impaired uses for Wilson/Jordan Creeks to meet consent decree obligations which do not include groundwater and drinking water. TMDLs are written to meet surface WQS (40 CFR § 130.7(c)(1)(ii)). Wilson/Jordan Creeks' aquatic life use and general criteria standards are all addressed by using storm water runoff as a surrogate for the toxic mix of stressors and multiple pollutants transported by storm water into streams. The surrogate relationship between storm water runoff and the toxic mix of pollutants impairing Wilson/Jordan Creeks' aquatic life designated beneficial use is explained in Section 4.4 of the TMDL.**

17. Comment: What data was used to establish the Wilson Creek Flow Duration Curve in Figure 9? Wilson above the SW WWTP is a dry losing stream most of the time. This is not reflected in the FDC. It appears this data is erroneous.

**17. Response: Data from biological reference streams were used to generate Figure 9 which shows the FDC for Wilson and Jordan Creek watersheds and synthetic flow record. The commentor is directed to Appendices B, C and D to find the data and further analyses. Data used in the TMDL's calculations not in the final TMDL is being placed into STORET for better data sharing. The STORET Data Warehouse is EPA's repository of the water quality monitoring data collected by water resource management groups across the country. The new water quality exchange (WQX) makes uploading data to STORET easier so more groups are able to share data. Please access data for this TMDL at the following Website: [http://www.epa.gov/STORET/dw\\_home.html](http://www.epa.gov/STORET/dw_home.html). Assistance on using STORET is available at <http://www.epa.gov/STORET/owners.html>.**

18. Comment: The data presented on page 31 and the data on page 36 present contradictory findings. One page says there is an absence of riffles and pools with little brush or woody debris suitable of aquatic life, while on the other page the TMDL says that there is the highest rated riffle, Jordan Creek had the greatest overall community health for the stream and some of the highest rated healthy habitat. It seems the TMDL is making whatever argument it needs from the same data.

**18. Response: Rather than being contradictory, the information is from two different sampling events and when added together present a strong argument that the decreased aquatic life is from poor water quality (with storm water runoff as a factor).**

**Page 31 is a 2009 EPA sampling event and page 36 is a 2008 city of Springfield sampling event. One study found depressed aquatic life and poor habitat conditions. The other study found better habitat conditions, but still no aquatic life. The conclusion is drawn that despite an improved habitat, the aquatic life impairment remains and must be from water quality where storm water runoff can be used as surrogate.**

To further address the commentors concerns about the seeming inconsistency in the TMDL, page 31 is saying that the reach had the highest rated riffle and rootmat of those locations sampled during that sampling event. Page 36 says that the sampling found no riffle and rootmat. Because the sampling events were separated over time and may not have used the same sampling locations, it isn't surprising to see some difference in data. EPA has no knowledge of the exact sampling and analysis procedures used for the city of Springfield's sampling event. However, EPA's data sampling (representative of instream conditions) and analysis (protocol for calculating macro-invertebrate scores) met the Quality Assurance/Quality Control levels of Missouri's Listing Methodology and document (10 CSR 20-7.031 and 10 CSR 20-7.050). Both studies, despite their disparities, found no aquatic life. All EPA data has been analyzed and presented consistent with the procedures included in Appendices A, C, D and E; 40 CFR § 130.2(i) and 40 CFR § 130.7(c)(1).

19. Comment: Several commentors provided anecdotal information about pollution, impairments and history in Wilson Creek, Jordan Creek and Brewery Springs.

**19. Response: EPA appreciates the commentors' information. Some of the information was used as a basis to conduct new sampling to provide data of a sufficient quality to be included in the TMDL. The data supplied needs to meet the minimum level that MDNR considers for use in determining TMDL targets and modeling: Data needs to be representative of instream conditions and meet the Quality Assurance/Quality Control levels of Missouri's Listing Methodology document (10 CSR 20-7.031 and 10 CSR 20-7.050). The data used in the draft TMDL were the best available when writing the TMDL. The MOS in the TMDL accounts for any lack of knowledge concerning the relationship between effluent limitations and water quality, such as other potential sources of toxic material suggested by the commentor (40 CFR § 130.7(c)(1)). If the data provided by commentors is found to meet MDNR's minimum level for data inclusion, MDNR may consider submitting a revised or modified TMDL for this water at any time based on this or other data.**

20. Comment: Various commentors wanted to know why they received the public notice or how this affected their facility. Many did not know what type of current permit they held.

**20. Response: All permitted facilities in the watershed were mailed a copy of the public notice. The TMDL is being established at this time to meet the requirements of the consent decree and MDNR may consider submitting a revised or modified TMDL for this water at any time. For this TMDL storm water runoff is a surrogate for the mix of pollutants transported by storm water and the physical impacts affecting biological stream functioning in accordance with Section 303(d) of the Clean Water Act. MDNR has the authority to issue and enforce state operating permits. Accordingly, the WLA, which apply to regulated storm water discharges, will be implemented primarily through MDNR's MS4 permits. Commentors are directed to Appendix A in the TMDL to identify their current permit type.**

## LIST OF COMMENTORS

1. Bill McMercury, Darlington International, phone conversation 09/01/10.
2. Chuck Green, Ozark Cola Company, phone conversation 9/2/10.
3. Patty and Rick Swearingen, S&S Auto Salvage, phone conversation 9/21/10.
4. Adam Farley, citizen, various phone conversations 9/3/10 – 9/30/10.
5. Todd G. Wagner, Stormwater Services Division, city of Springfield, Missouri.

END SUMMARY OF COMMENT AND RESPONSES