

# Elimination of Discovered Nutrient Discharges From Grey Infrastructure

Findings: Expert Panel Final Report



Urban Stormwater Workgroup Meeting

June 17, 2014

# Process So Far

- Informational Briefing at USWG on 6/17
- Briefing of Wastewater Work Group on 6/24
- Teleconference with EPA Region 3 Water Protection Division on 7/8
- Comments received as of 7/11 deadline (VA DEQ, MDE, EPA R3 (Dinsmore))
- Still waiting for R3 Regulatory Comments

# 9 Creditable Nutrient Discharges

| No. | Discharge Type                               | Protocol Used |
|-----|--|---------------|
| N-1 | Laundry Wash Water                           | 1             |
| N-2 | Commercial Car Wash                          | 1             |
| N-3 | Floor Drains                                 | 1             |
| N-4 | Misc. High Nutrient Discharges               | 1             |
| N-5 | Sanitary Direct Connection                   | 1             |
| N-6 | Sewer Pipe Exfiltration                      | 2             |
| N-7 | Drinking Water Transmission Loss             | 2             |
| N-8 | Dry Weather Sanitary Sewer Overflows         | 3             |
| N-9 | Chronic Wet Weather Sanitary Sewer Overflows | 3             |

# The Crediting Approach

The guiding principle is that elimination of a discovered nutrient discharge could only be considered as a urban BMP, if they:

- Are detected and physically eliminated
- On-site sampling of the discharge that has been eliminated to define one or more of the following parameters -- nutrient concentration, flow rate and duration
- Subsequent inspections and/or monitoring verify or otherwise confirm that discharge no longer exists

# Data Requirements to Compute the Credits

**Table 5**  
**Data Requirements to Compute Reduction Credits**

| No. | Discharge Type                   | Method | Nutrients | Flow Volume | Flow Duration |
|-----|----------------------------------|--------|-----------|-------------|---------------|
| N-1 | Laundry Wash Water               | 1      | S or D    | E or M      | E             |
| N-2 | Commercial Car Wash              | 1      | S         | E or M      | E             |
| N-3 | Floor Drains                     | 1      | S         | E or M      | E             |
| N-4 | Misc. High Nutrient Discharges   | 1      | S         | E or M      | E             |
| N-5 | Sanitary Direct Connection       | 1      | S or D    | E or M      | E             |
| N-6 | Sewer Pipe Exfiltration          | 2      | S or D    | M           | E             |
| N-7 | Drinking Water Transmission Loss | 2      | S or D    | M           | E             |
| N-8 | Dry Weather SSOs                 | 3      | D         | E           | M             |
| N-9 | Chronic Wet Weather SSOs         | 3      | D         | E           | M             |

KEY: S= SAMPLE, D=Use DEFAULT VALUE, E=ESTIMATE, M= MEASURE

# 7. The Temporary Program Credit

- An temporary credit to provide incentives to communities to re-focus their existing IDDE and SSO abatement programs toward greater *nutrient reduction* without initially having to compute reductions for individual events.
- Only available to localities that go above and beyond the minimum requirements set forth under their MS4 permit and SSO consent decree

# Regulatory/Policy Comments and Objections

- Red Flags Raised by EPA WPD and VA DEQ
- Involve both SSOs and IDDE
- Topic Elevated to a Co-Regulatory Meeting with EPA and states in August to hopefully resolve issue
- Further work on this panel suspended until issue is resolved

# Technical Comments

- Better define IDDE levels for Programmatic Credit
- Phasing in Model
- Is it in the Baseline Calibration?
- How do discharges interact w/ other BMPs
- Eliminated discharges should have an expiration date.