**Federal Facilities Workgroup** 

# Federal Agency BMP Credit Evaluation Update

September 13, 2022



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### Federal Agency Data Request Results

Status of Federal Agency BMP Data Request										
Agency/State	MD	NY	PA	VA	DC	WV				
ARS										
DoD										
GSA										
NASA										
NPS										
Smithsonian										
USACE										
US FWS										
USFS										

Red: No BMPs reported

Green: BMP data was provided

Thank you to everyone who submitted BMP data!

### **BMP Credit Evaluation Results**

BMP Credit Evaluation Results											
Agency/State	MD	NY	PA	VA	DC	WV					
ARS	0%				0%						
DoD	96%	100%	98%	79%	39%	0%					
GSA	7%	No BMPs reported.	No BMPs reported.	No BMPs reported.	6%	No BMPs reported.					
NASA	62%			47%							
NPS	0%		100%	100%	No BMPs reported.	0%					
Smithsonian	No BMPs reported.			No BMPs reported.	No BMPs reported.						
USACE	No BMPs eligible.	No BMPs eligible.	79%	No BMPs reported.	No BMPs reported.	No BMPs eligible.					
US FWS	0%		75%	10%		0%					
USFS				No BMPs reported.		No BMPs reported.					

% = Number of BMPs in CAST / Number of BMPs Eligible for Credit in CAST

### **BMP Types Not Eligible for Credit**

Some BMPs are not eligible for credit in CAST. Refer to the CAST Source Data spreadsheet or the BMP Quick Reference Guide for a list of creditable practices & the criteria for credit.



**Indoor water conservation measures** 



Land conservation



Water quality monitoring



**NPDES** permit implementation

### **BMPs Not Eligible for Federal Credit**

Federal agencies do not receive credit in CAST for some classes of BMPs because they do not have assigned pollutant loads in those source sectors.



Construction



**Septic** 



**Harvested Forest** 



**Wastewater** 



Agriculture

### What BMPs Are Eligible?

Abandoned Mine Reclamation

Advanced Grey Infrastructure Nutrient Discovery Program (IDDE)

Advanced Sweeping Technology - Multiple practices

Algal Flow-way Non-Tidal Monitored

Algal Flow-way Non-Tidal

Algal Flow-way Tidal

Algal Flow-way Tidal Monitored

Bioretention/raingardens - A/B soils, no underdrain

Bioretention/raingardens - A/B soils, underdrain

Bioretention/raingardens - C/D soils, underdrain

Bioswale

Conservation Landscaping Practices

Diploid Oyster Aquaculture 2.25 Inches

Diploid Oyster Aquaculture 3.0 Inches

Diploid Oyster Aquaculture 4.0 Inches

Diploid Oyster Aquaculture 5.0 Inches

Diploid Oyster Aquaculture Greater 6.0 Inches

Dirt & Gravel Road Erosion & Sediment Control - Driving Surface Aggregate + Raising the Roadbed

Dirt & Gravel Road Erosion & Sediment Control - Driving Surface Aggregate with Outlets

Dirt & Gravel Road Erosion & Sediment Control - Outlets only

Dry Detention Ponds and Hydrodynamic Structures

**Dry Extended Detention Ponds** 

Filter Strip Runoff Reduction

Filter Strip Stormwater Treatment

Filtering Practices

Floating Treatment Wetland 10% Coverage of Pond

Floating Treatment Wetland 20% Coverage of Pond

Floating Treatment Wetland 30% Coverage of Pond

Floating Treatment Wetland 40% Coverage of Pond

Floating Treatment Wetland 50% Coverage of Pond

Forest Buffer

Forest Planting

**Grass Buffers** 

Impervious Disconnection to amended soils

Impervious Disconnection to amended soils

Impervious Surface Reduction

Infiltration Practices w/ Sand, Veg. - A/B soils, no underdrain

Infiltration Practices w/o Sand, Veg. - A/B soils, no underdrain

Mechanical Broom Technology - Multiple practices

Non Urban Shoreline Erosion Control Non-Vegetated

Non Urban Shoreline Erosion Control Vegetated

Non Urban Shoreline Management

Non Urban Stream Restoration

Non Urban Stream Restoration Protocol

**Nutrient Management Maryland Commercial Applicators** 

Nutrient Management Maryland Do It Yourself

**Nutrient Management Plan** 

Nutrient Management Plan High Risk Lawn

Nutrient Management Plan Low Risk Lawn

Oyster reef restoration - enhanced denitrification

Oyster reef restoration - nutrient assimilation

Permeable Pavement w/ Sand, Veg. - A/B soils, no underdrain

Permeable Pavement w/ Sand, Veg. - A/B soils, underdrain

Permeable Pavement w/ Sand, Veg. - C/D soils, underdrain

Permeable Pavement w/o Sand, Veg. - A/B soils, no underdrain

Permeable Pavement w/o Sand, Veg. - A/B soils, underdrain

Permeable Pavement w/o Sand, Veg. - C/D soils, underdrain

Site-Specific Monitored Oyster Aquaculture

Storm Drain Cleaning

Stormwater Performance Standard-Runoff Reduction

Stormwater Performance Standard-Stormwater Treatment

Tree Planting - Canopy

Triploid Oyster Aquaculture 2.25 Inches

Triploid Oyster Aquaculture 3.0 Inches

Triploid Oyster Aquaculture 4.0 Inches

Triploid Oyster Aquaculture 5.0 Inches

Triploid Oyster Aquaculture Greater than 6.0 Inches

Urban Shoreline Erosion Control Non-Vegetated

Urban Shoreline Erosion Control Vegetated

Urban Shoreline Management

**Urban Stream Restoration** 

**Urban Stream Restoration Protocol** 

Vegetated Open Channels - A/B soils, no underdrain

Vegetated Open Channels - C/D soils, no underdrain

Wet Ponds and Wetlands

Wetland Enhancement

Wetland Rehabilitation

# Inspection, Maintenance, and Lifespan Issues

Some BMPs are excluded from CAST because of the BMP's inspection, maintenance, or implementation information.



BMP is not credited due to an outdated inspection.

Need to report a recent passed inspection.



BMP is not credited due to a failed inspection.

Need to report a maintenance date or a recent passed inspection.



BMP is not credited because it is already accounted for in the CAST baseline data.

No action required; pollutant reductions are already captured in CAST.



BMP is not credited because it is an annual BMP implemented in a past year.

No action required; report annual BMPs each year they are implemented in a new row.

### Other Issues

Federal agencies do not receive credit in CAST for some classes of BMPs because they do not have assigned pollutant loads in those source sectors.



### BMP not found in jurisdiction database.

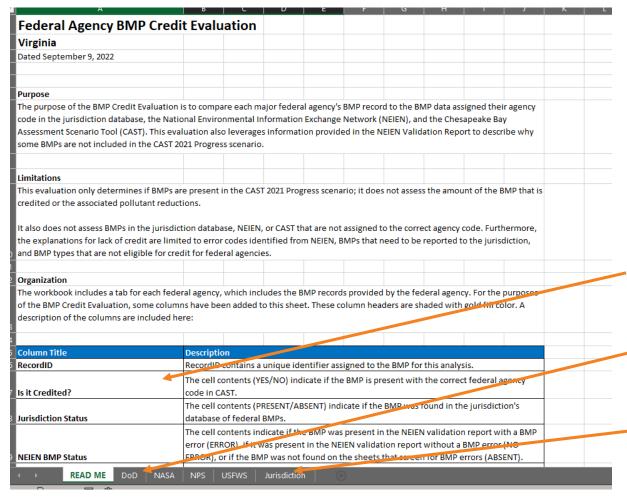
BMP may need to be reported to the jurisdiction; be sure to use the jurisdiction's specified reporting template.



BMP is not credited due to missing required information.

Provide missing information.

### **Spreadsheet Organization: READ ME**



Start on the READ ME sheet.

Explains how to interpret the results

Individual agency sheets with BMP records

"Jurisdiction" sheet includes jurisdiction BMP record for federal agencies

### **Interpreting Overall Results**

The READ ME sheet includes a table with a summary of the results of the BMP Credit Evaluations by agency.

#### NASA NPS **USFWS** DoD **BMPs in CAST from Agency Dataset** 1388 16 20 40 102 BMPs Not in CAST from Agency Dataset 471 Number of BMPs Eligible for Credit 20 1755 34 18 Number of Eligible BMPs Not in CAST 367 85 11 19 BMPs in only Jurisdiction Dataset 574 47% 10% 79% 100% Percent BMPs in CAST (of Eligible BMPs)

#### **Interpretation Notes:**

This is the maximum number of BMPs that can be credited.

These are the BMPs that potentially could be credited but are not currently.

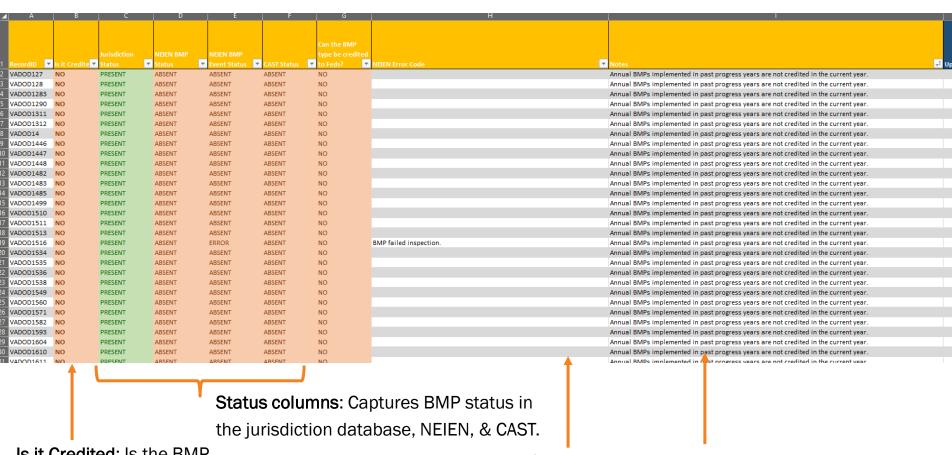
These are BMPs that should be added to the federal agency's record or removed from the jurisdiction record.

Number of BMPs from the data provided by the federal agency that are and are not present in the CAST 2021 Progress scenario.

Number of BMPs from the data provided by the federal agency that are considered eligible for credit in CAST and the number of those BMPs that are not in CAST.

Number of BMPs that are present in the jurisdiction database that could not be matched to a record in the federal agency dataset.

### **Spreadsheet Organization: Agency Tabs**



**Is it Credited**: Is the BMP present in the CAST 2021 Progress scenario?

**NEIEN Error Code**: Error code straight out of NEIEN, if applicable.

**Notes**: BC observations and recommendations.

### **Spreadsheet Organization: Jurisdiction tab**



In Federal Database?: "ABSENT" indicates the BMP was not found in the federal agency's BMP record. A number corresponds to the BMP's row on the federal agency sheet.

Agency Code: Filter for your agency in the yellow-highlighted column

### Recommended Actions for Federal Agencies

1. Review BMPs that are not in the jurisdiction database.

Prioritize reporting of these BMPs in the next data collection period.

- 2. If the BMP lifespan is expired, report the latest inspection date. If required information is missing, report it in the next data collection period.
- 3. Review BMPs that are in the jurisdiction database but not in your data record. Determine if these BMPs exist at your facilities.

If so, assess if updates should be reported in the next data collection period. If not, coordinate with the jurisdiction to remove the invalid records.

4. Review BMPs that are not credited that do not have a NEIEN Error Code. If it is not clear why the BMP isn't credited, coordinate with the jurisdiction.

### **Remaining Tasks**

#### Task 3: 2021 Progress Evaluation

For federal agencies with a reasonably complete BMP record (criteria TBD), BC utilize CAST to evaluate the federal agency's 2021 Progress loads.

#### Task 5: Level of Progress Evaluation

In jurisdictions where there is consensus between the FFWG, federal agencies, and the jurisdictions on the FPGs, BC will calculate the remaining reductions required to meet the FPGs for the federal agencies included in Task 3.

### **Task 6: Summary Technical Memorandum**

BC will develop a report summarizing the results of the completed evaluations.

#### **Task 7: FFWG Presentations**

BC will present the results of the complete evaluations to the FFWG in a one-hour webinar.



## **Questions?**