

Chesapeake Bay Action Team (CBAT)

BMP Inspection, Maintenance, & Verification

October 26, 2017





Presentation Outline

- Background & Purpose
- Importance of Inspection & Maintenance
- Jurisdiction Guidance & Requirements
- Reporting in the BMP Datacall
 - Resources
 - Strategies for Success
- Conclusion

Background & Purpose

Background

To meet the goals of the Chesapeake Bay total maximum daily load (TMDL), stormwater permits, and DoD-specific policies, DoD must implement BMPs to manage stormwater runoff

Purpose

To retain credit, BMPs must be properly maintained and inspected, and those actions must be reported

Future reporting will require complete and accurate records of inspection, maintenance, and verification of BMPs

Why Verify?

In 2013, Urban Stormwater Workgroup (USWG) convened the **BMP Verification Review Panel** and developed guidance for BMP verification.

verification | the process through which agency partners ensure practices, treatments, and technologies resulting in reductions of nitrogen, phosphorus, and/or sediment pollutant loads are implemented and operating correctly.

Credit is renewed or extended based on a visual inspection (or other method) to verify the BMP exists and functioning properly.

Based on CBP guidance, verification systems will be developed and finalized by the jurisdiction.

Inspection, Maintenance, & Reporting are Key

Localities & Installations

To ensure **return on investment** for BMPs installed to reduce pollutant loads and **retain credit** for the Bay TMDL, inspections & maintenance must be performed and documented





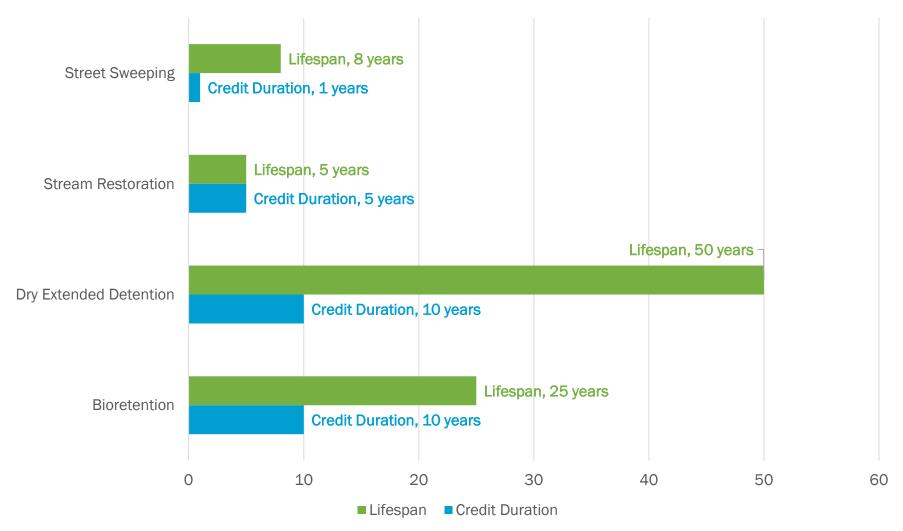
Chesapeake Bay Program To ensure reported BMPs exist and function as intended over their design life, verification is necessary

Reported BMPs only translate to **long-term water quality outcomes** if they continue to remove pollutants at the documented efficiencies

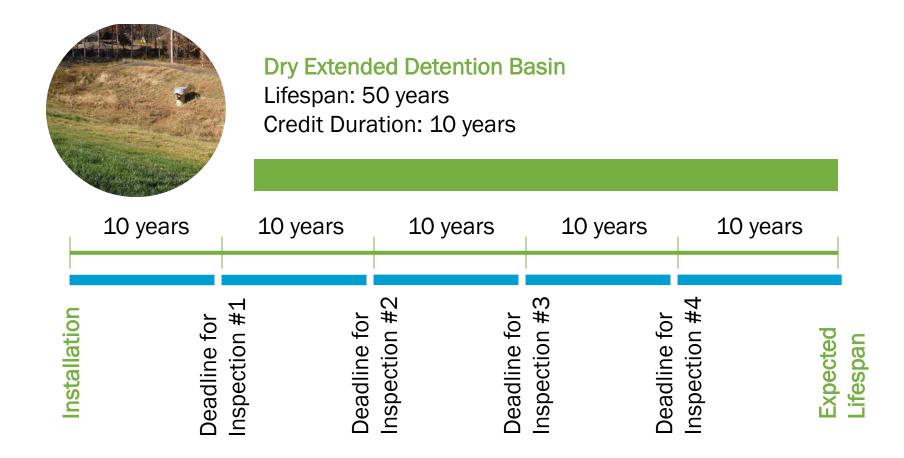




CBP BMP Lifespan & Credit Duration



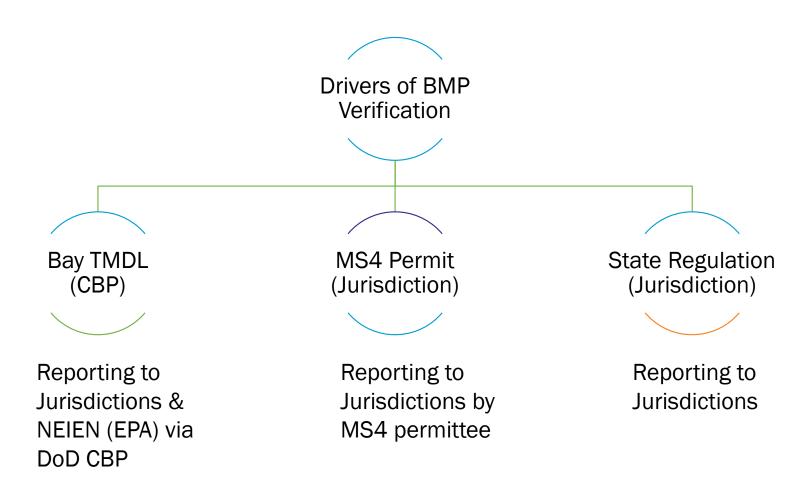
CBP BMP Lifespan & Inspection



[✓] Meet inspection dates, maintain credit

Don't conduct inspections or take corrective action for failed inspections, lose credit

Jurisdiction Guidance



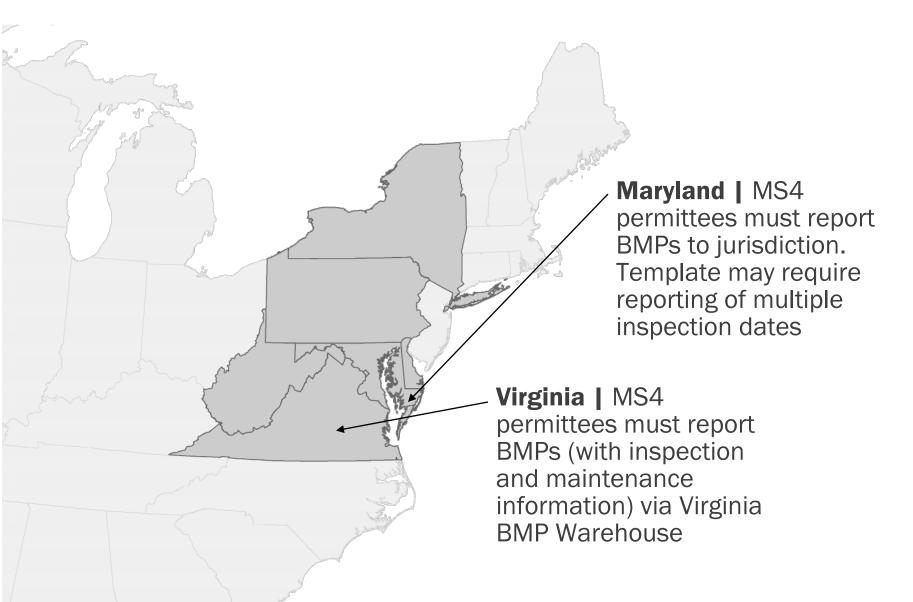
Jurisdiction Requirements

State	Source	Minimum Inspection Frequency	Maintain Records	Annual Reporting?
Virginia	VSMP	5 years	5 years	Yes
Maryland	MS4	3 years	3 years	Yes
Pennsylvania	MS4	Annually (year 0 – 5) 3 years (year 5+)	3 years	Yes
Washington, D.C.	MS4	Varies	3 years	Yes
West Virginia	MS4	5 years	3 years	Yes
New York	MS4	Varies	5 years	Yes

Annual reporting requirements include a combination of:

- Owner information
- Inspection record
- Enforcement mechanism and actions (if applicable)

Upcoming Changes to CBP Reporting



BMP Verification in Virginia

Conduct inspection BMP retains BMP passes before end of credit credit in the inspection, duration PASS status Model reported BMP fails Maintenance inspection, FAIL performed, date status reported recorded No corrective **BMP** loses action is taken credit Don't conduct Inspection date inspection before end not reported of credit duration

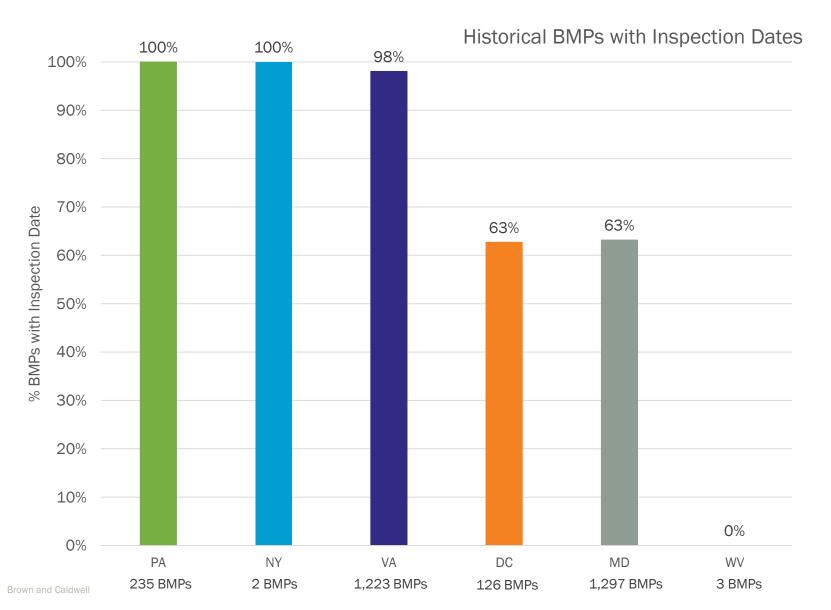
Current BMP Datacall

FY17 datacall templates included fields related to BMP inspection and maintenance, such as:

- ✓ BMP type
- ✓ BMP location
- ✓ BMP installation date
- ✓ Inspection date
- ✓ BMP status (PASS/FAIL)
- ✓ Maintenance date

Requested fields vary by jurisdiction.

Current BMP Datacall

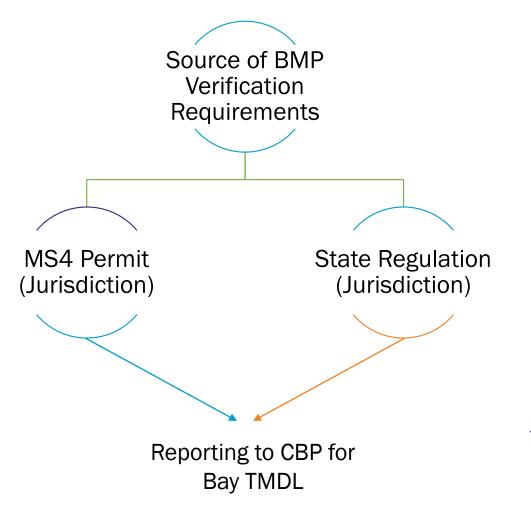


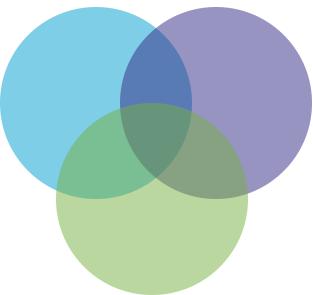
Looking Forward: FY18 Datacall

Inspection and maintenance information will be required in the FY18 datacall. To prepare:

- Separate consolidated BMP records into individual records (one BMP per row)
- 2. Begin compiling information about past inspections and maintenance
- Document inspection and maintenance to be performed in the next year
- 4. Leverage existing BMP records

Leverage Existing BMP Records





Installations with MS4 permits must track inspection dates.
Design standards for BMPs recommend frequent inspection.

Assistance from DoD CBP

How can the DoD CBP assist you in your preparations?

- Highlight BMPs in datacall that are in danger of losing credit if inspection data are not provided
- Provide information about BMP verification procedures

Conclusion

- Next year's datacall will emphasize inspection and maintenance dates or other required information
- Timely & accurate completion and reporting of these activities are key to maintaining credit for BMPs installed at DoD installations

Start now!

Contact the DoD CBP if you have any questions.



QUESTIONS?

If you are interested in a report of the BMPs submitted to the jurisdiction from your installation in the BMP datacall, please contact Adam Wright (adam.g.wright@navy.mil) or Sarah Diebel (sarah.diebel@navy.mil)