

Wastewater, CSO and Onsite BMP Verification Protocol Development

State Current or Planned Verification Protocols

State	Non-Significant WWTPs	CSOs	On-site Systems
MD	All existing non-sigs to claim upgrade credits and new non-sigs without WLAs are required to report monitoring data.	<ul style="list-style-type: none"> • post-construction monitoring required in the CSO permits. • Confirmatory sampling and analysis for eliminated CSOs. 	<ul style="list-style-type: none"> • Approving authorities are verifying, tracking and reporting proper installation of MDE approved BAT systems. • A proposed regulation requires reporting of all BAT installations and reporting of all O&M visits that must occur at least once a year. • A BAT system shall be operated by and maintained by a certified service provider. • Two on-site system databases track on-site BMP details regarding the location and types of on-site systems permitted within the state, including innovative and alternative (I/A) technologies (de-nitrification) and connections to wwtp. • All I/A's are required to have mandatory operation and maintenance and inspection by certified service providers and report to the tracking databases. • The revised regulations will also increase the inspection rate from current 60% to 100%.
DE	The only one DE nonsig plant in the Watershed has already been reporting monitoring data.	No CSOs in the watershed	
WV	Nonsigs seeking credit (or using performance based offsets) will get a facility-specific allocation and monitoring requirements.	<ul style="list-style-type: none"> • review of CSO reports, corrective actions through enforcement as warranted. 	WV annually report pump outs and connections to centralized systems.

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VA	If non-significant facilities are to be granted credits, then monitoring must be performed to document that they are operating under their WLA. Additional monitoring is typically required to establish loads from industrial facilities connecting to regional WWTPs.	<ul style="list-style-type: none"> • The monitoring or reporting protocols in the CSO NPDES permits. 	<p>VDH already adopted the Alternative Onsite Sewage Regulations. Any nitrogen removal systems installed are considered alternative onsite sewage systems (AOSS) and would fall under these regulations.</p> <ul style="list-style-type: none"> • Completion statements from the designer are required for all system installations that the system was installed in substantial compliance with the approved plans and specs. • All AOSSs are required to submit an inspection report annually to VDH by a web based system by licensed AOSS operators. • Large AOSSs have minimum operator visit frequencies. Sampling is required for the large systems for TN.
PA	Monitoring results	<ul style="list-style-type: none"> • Elimination of CSO will be reported. If continued overflow occur, the entities will need to report it. • Violations will be managed via existing compliance and enforcement procedures. 	<ul style="list-style-type: none"> • Connection is reported by WWTPs when they seek offsets of load as required by their NPDES permit supplement. • Routine pump outs of existing and future on-site systems are currently recommended by regulation and may be required by municipal ordinance. • Pa DEP is always reviewing vendor submitted alternate technologies for on-site treatment systems.
DC	Monitoring must be performed to claim upgrade credit.	<ul style="list-style-type: none"> • post-construction monitoring required in the NPDES permit 	No On-site systems
NY	Plan to add monitoring requirements to all NY Nonsig Plants	<ul style="list-style-type: none"> • Post Construction Monitoring and Modeling Plans. • Review of the BMP annual report and on site inspections to determine compliance. 	No info provided

Draft BMP Verification Protocols for Non-sig WWTPs

State	Non-Significant WWTPs	CSOs	On-site Systems
	<ul style="list-style-type: none">• Monitoring requirement in the permit to verify nonsig wwtp upgrades and the offsets of new or expanding nonsig plants.• Reporting the results through DMR.	<ul style="list-style-type: none">• Construction Verification: properly designed, installed, and maintained by certified service providers.• Post construction monitoring or confirmation sampling and Inspection.• Existing compliance and enforcement procedures.• Tracking and reporting	<ul style="list-style-type: none">• State or local authorities should verify, track and report proper installation, O&M of onsite BMP systems.• The design and installation onsite BMP systems should be done and reported by certified service providers.• The maintenance and inspection of onsite BMP systems should be conducted and reported annually by certified providers and tracked by the authorities.• Tracking and reporting through the databases managed by state agencies.