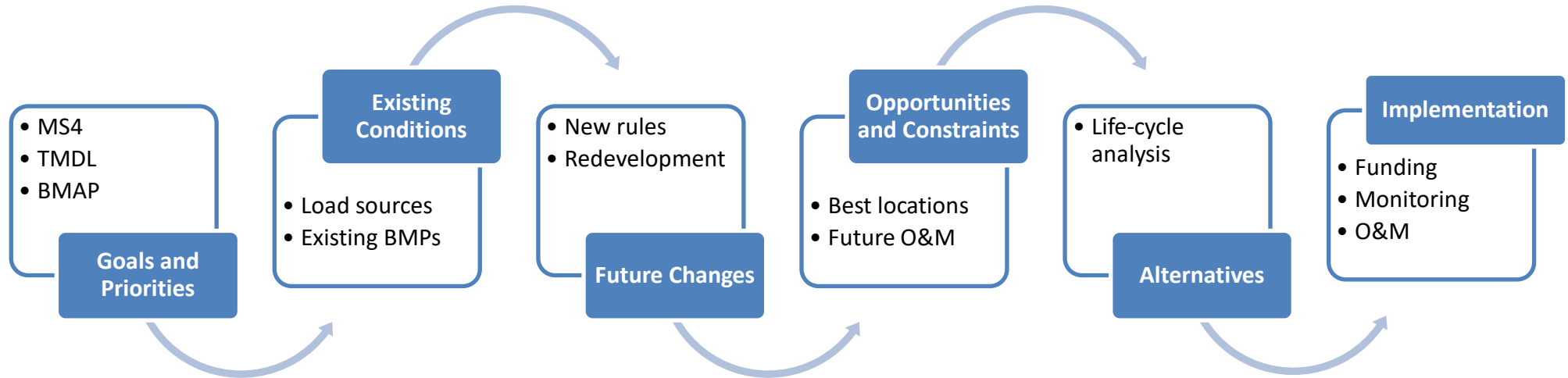


Structural Pollution Control Planning

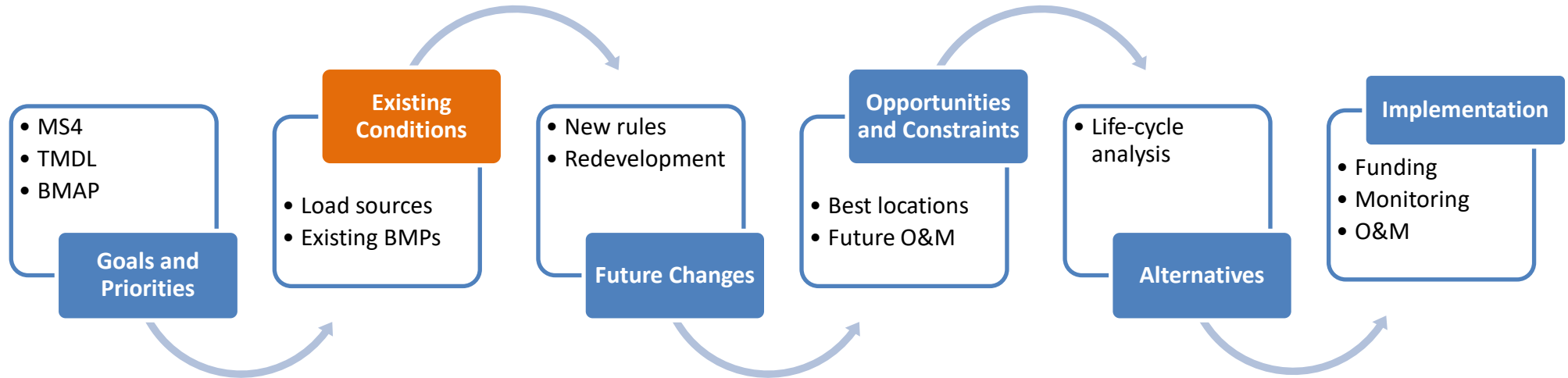
MS4 Permits: Demonstrating
Compliance with New
Permits

September 16, 2022

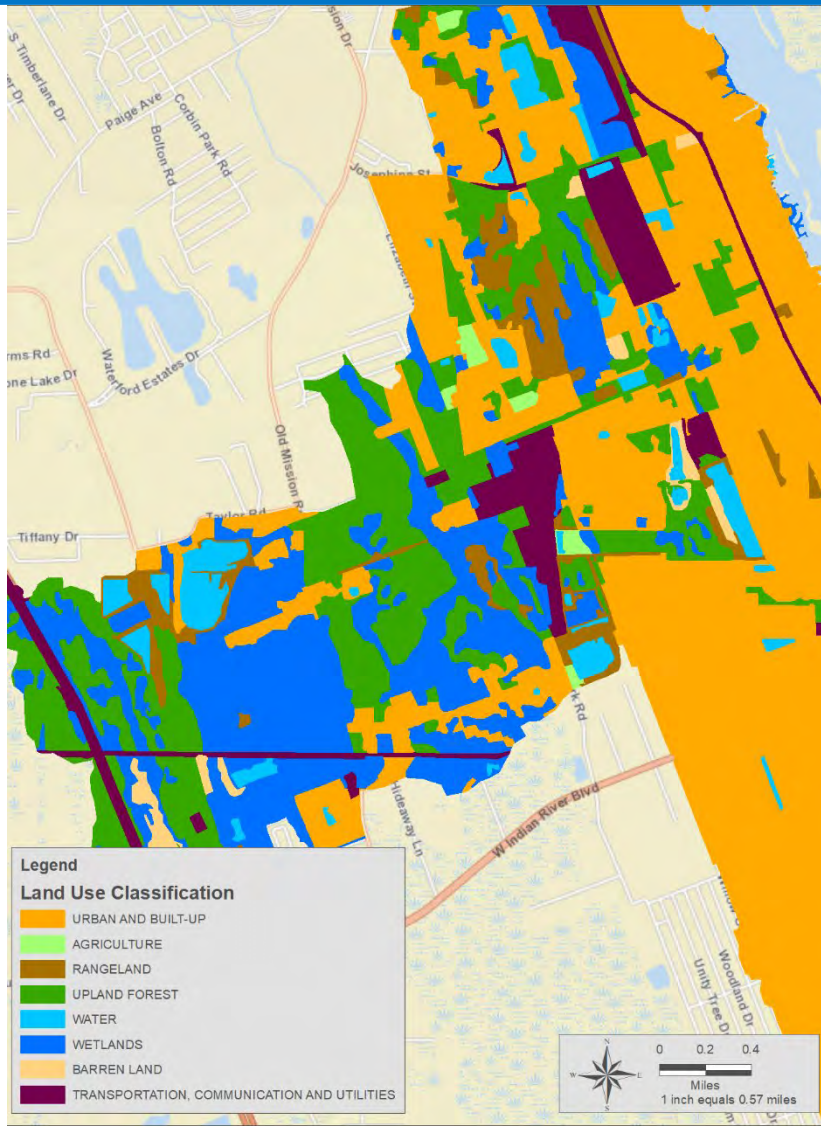
Overall Planning Strategy



Overall Planning Strategy



Existing Conditions - Understanding Pollutant Sources



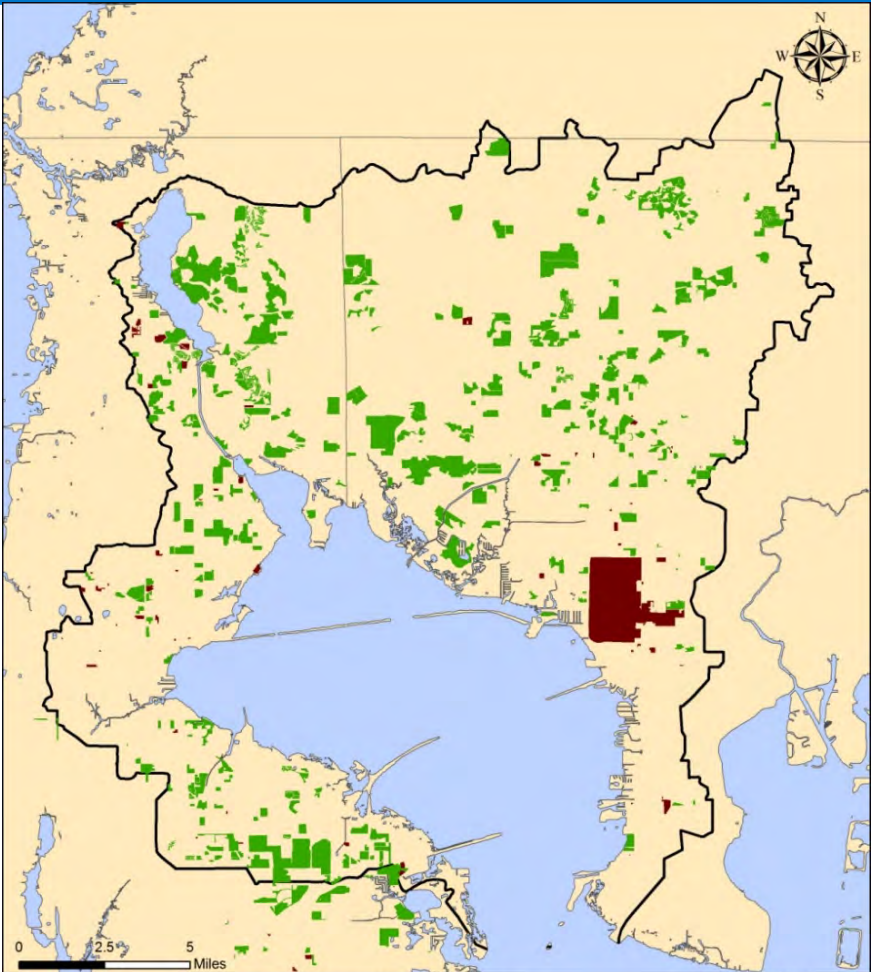
- **Event Mean Concentrations (EMCs)**

vs.

Buildup and Washoff

- **Lessons learned from early Phase 1 monitoring**

Existing Conditions - Identifying Existing Treatment



Old Tampa Bay
Integrated Model Project

- BMP Type**
-  Dry
 -  Wet
 -  Old Tampa Bay Watershed



Existing Conditions – Best Management Practice Removal Efficiencies

The screenshot shows a web browser displaying the Florida Department of Environmental Protection (DEP) website. The URL is <https://floridadep.gov/dear/water-quality-restoration/content/statewide-best-management-practice-bmp-efficiencies>. The page features a dark blue header with the DEP logo and navigation links: "About DEP", "How Do I", "Divisions", "Air", "Lands", "Parks & Rec", "Waste", and "Water". A search bar is visible on the right side of the header. The main content area has a background image of a lush green forest. The title "Statewide Best Management Practice (BMP) Efficiencies" is prominently displayed. Below the title, a breadcrumb trail reads: "Home » Divisions » Division of Environmental Assessment and Restoration » Water Quality Restoration Program » Statewide Best Management Practice (BMP) Efficiencies". On the left side, there is a sidebar titled "Water Quality Restoration Program Quick Links" with three items: "Basin Management Action Plans (BMAPs)", "Statewide Annual Report", and "Meeting Notification and Updates". The main text area contains the heading "Statewide Best Management Practice (BMP) Efficiencies for Nonpoint Source Management of Surface Waters" and a paragraph explaining the DEP's methods for calculating total nitrogen (TN) and total phosphorus (TP) reductions for watershed restoration.

Florida Department of Environmental Protection

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SEARCH...

Statewide Best Management Practice (BMP) Efficiencies

Home » Divisions » Division of Environmental Assessment and Restoration » Water Quality Restoration Program » Statewide Best Management Practice (BMP) Efficiencies

Water Quality Restoration Program Quick Links

- Basin Management Action Plans (BMAPs)
- Statewide Annual Report
- Meeting Notification and Updates

Statewide Best Management Practice (BMP) Efficiencies for Nonpoint Source Management of Surface Waters

This website describes the DEP methods to calculate total nitrogen (TN) and total phosphorus (TP) reductions for watershed restoration, when site-specific information is not available. These calculation methods represent typical BMP performance in Florida, which may be useful to stakeholders when selecting BMPs to achieve nutrient load reductions related to the development and implementation of BMAPs, 4e plans, and 4b/reasonable assurance plans (RAPs). DEP assigns nutrient removal efficiencies and nutrient credits to BMPs on a case-by-case basis, using the information as a guide during the decision-making process.

Existing Conditions – Best Management Practice Removal Efficiencies

BMP Type	Standard BMPs	TP % Reduction	TN % Reduction	Data Source
Retention¹	Offline retention BMPs (must limit catchment to <10 acres)	See Table 5 for formulas	See Table 5 for formulas	<i>Evaluation of current stormwater design criteria within the state of Florida,</i> Harper, H., and D. Baker 2007; and DEP evaluation/ regression of Harper and Baker 2007
	Online retention BMPs	See Table 5 for formulas	See Table 5 for formulas	DEP evaluation/regression of Harper and Baker 2007
	Grass swales with swale blocks or raised culverts	Use on-line retention BMPs	Use online retention BMPs	DEP evaluation/regression of Harper and Baker 2007
	Grass swales without swale blocks or raised culverts	50 % of value for grass swales with swale blocks or raised culverts	50 % of value for grass swales with swale blocks or raised culverts	DEP evaluation/regression of Harper and Baker 2007
	Retention or Detention BMPs with Nutrient Reducing Media	Use appropriate retention/detention calculation and add media % removal as a treatment train (see Table 2 for media mix efficiencies from the 2020 or newer BMPTRAINS User's Manual and unlisted media mixes)	Use appropriate retention/detention calculation and add media % removal as a treatment train (see Table 2 for media mix efficiencies from the 2020 or newer BMPTRAINS User's Manual and unlisted media mixes)	2020 or newer BMPTRAINS User's Manual
Detention²	Wet detention ponds	Formula shown in Figure 13.2 of <i>Draft stormwater treatment applicant's handbook</i> (see Figure 1 below for formula)	Formula shown in Figure 13.3 of <i>Draft stormwater treatment applicant's handbook</i> (see Figure 2 Figure 2 below for formula)	March 2010 draft DEP and water management districts (WMDs) <i>ERP Stormwater Quality Applicant's Handbook</i>
	Dry detention ponds	10 %	10 %	DEP evaluation/regression of Harper and Baker 2007

Existing Conditions – Best Management Practice Removal Efficiencies



Stormwater Management Academy

"Managed Stormwater is Good Water"



University of Central Florida

User Manual for the BMP Trains 2020 Model

Version 4.3.5
December 1, 2021

Marty Wanielista, Ron Eaglin, Harvey Harper, Eric Livingston,
Mike Hardin, Rich Magee, Przemyslaw Kuzlo, and Ikiensinma Gogo-Abite

Existing Conditions – Non-Structural Best Management Practices



Image source:
Globalsweeper.com

Existing Conditions – Non-Structural Best Management Practices

BMP Type	Standard BMPs	TP % Reduction	TN % Reduction	Data Source
Material Collection	<p>Street sweeping (materials collected from roadway and gutter sweeping)</p> <p>Do not include baffle box material collected¹—see baffle box category above that includes maintenance benefits</p>	<p>Determine annual average dry weight/volume of material collected over a period of 3 years (or representative period of current effort) and enter values into the Florida Stormwater Association (FSA) University of Florida (UF) Municipal Separate Storm Sewer (MS4) BMP Toolkit (FINAL MS4 Load Reduction Tool 2019 or newer version) for estimated TP reduction</p>	<p>Determine annual average dry weight/volume of material collected over a period of 3 years (or representative period of current effort) and enter values into the Florida Stormwater Association (FSA) University of Florida (UF) Municipal Separate Storm Sewer (MS4) BMP toolkit (FINAL MS4 Load Reduction Tool 2019 or newer version) for estimated TN reduction</p>	<p>2019 Final Report (or newer version), FSA UF MS4 BMP Project</p>
	<p>Catch basin inserts/inlet filter cleanout (drainage features and units with no specific water quality treatment mechanism), including the following:</p> <ul style="list-style-type: none"> • Curb inlets. • Area catch basins. • Pavement catch basins. • Projects serving drainage and conveyance functions. • Swales (calculating under BMP cleanout category also acceptable). • Ditches (calculating under BMP cleanout category also acceptable). <p>Do not include baffle box material collected¹—see baffle box category above that includes maintenance benefits</p>	<p>Determine annual average dry weight/volume of material collected over a period of 3 years (or representative period of current effort) and enter values into the Florida Stormwater Association (FSA) University of Florida (UF) Municipal Separate Storm Sewer (MS4) BMP toolkit (FINAL MS4 Load Reduction Tool 2019 or newer version) for estimated TP reduction</p>	<p>Determine annual average dry weight/volume of material collected over a period of 3 years (or representative period of current effort) and enter values into the Florida Stormwater Association (FSA) University of Florida (UF) Municipal Separate Storm Sewer (MS4) BMP toolkit (FINAL MS4 Load Reduction Tool 2019 or newer version) for estimated TN reduction</p>	<p>2019 Final Report (or newer version), FSA UF MS4 BMP Project</p>

Existing Conditions – Non-Structural Best Management Practices

Research

fsa.memberclicks.net/research

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Research

Quick Links: [BMP Life-Cycle Costing](#) - [MS4 Assessment](#) - [Pathogens](#) - [Street Sweeping](#)

The FSA Educational Foundation has engaged in five research projects thus far, including two quantifying the load reduction value of routine maintenance activities performed by MS4 permit holders – the MS4 Assessment Projects.

BMP Life-Cycle Costing Project

Development of the BMP Life-Cycle Costing Tool was a collaborative effort between the Florida Stormwater Association Educational Foundation Board of Directors, members of the Water Management Districts, the Florida Department of Environmental Protection (DEP), the Florida Stormwater Association through Association Management Professionals, and other members of the Florida Stormwater Association.

Determining treatment effectiveness is an important part of project planning, design, grant funding, and ultimately achieving the most efficient investment of resources. However, the Florida Stormwater Association recognized that there is no industry standard for how to go about making these determinations. While there are standards for BMP efficiencies, there is not an industry standard in Florida for determining life-cycle costing. With treatment effectiveness often being one consideration in water quality grants, the absence of an industry standard leads to inequitable comparisons between projects. The tool developed under this project is being proposed as the industry standard for computing life-cycle costs for stormwater BMPs.

When developing a life-cycle cost, certain elements need to be defined such as construction costs, land costs, O&M costs, and the useful life of the installed infrastructure components. These elements need to be considered using a consistent approach to make a fair comparison between true overall project costs. This project focused on the useful life and consistent approach aspects with the goal of developing an industry standard. It did not cover capital costing, which is far too dynamic to be considered within this tool. Capital cost estimating needs to be done outside the tool and then transferred to it.

- [BMP Life-Cycle Costing Tool Summary Report](#)
- [BMP Life-Cycle Costing Tool - 2021](#)

MS4 Assessment Projects

The Environmental Engineering Sciences Department within the UF College of Engineering was engaged on two occasions to assist in quantifying the load reduction values of MS4 maintenance activities. The projects finished in 2011 and 2019 built upon a review of research reports completed

Existing Conditions – Non-Structural Best Management Practices

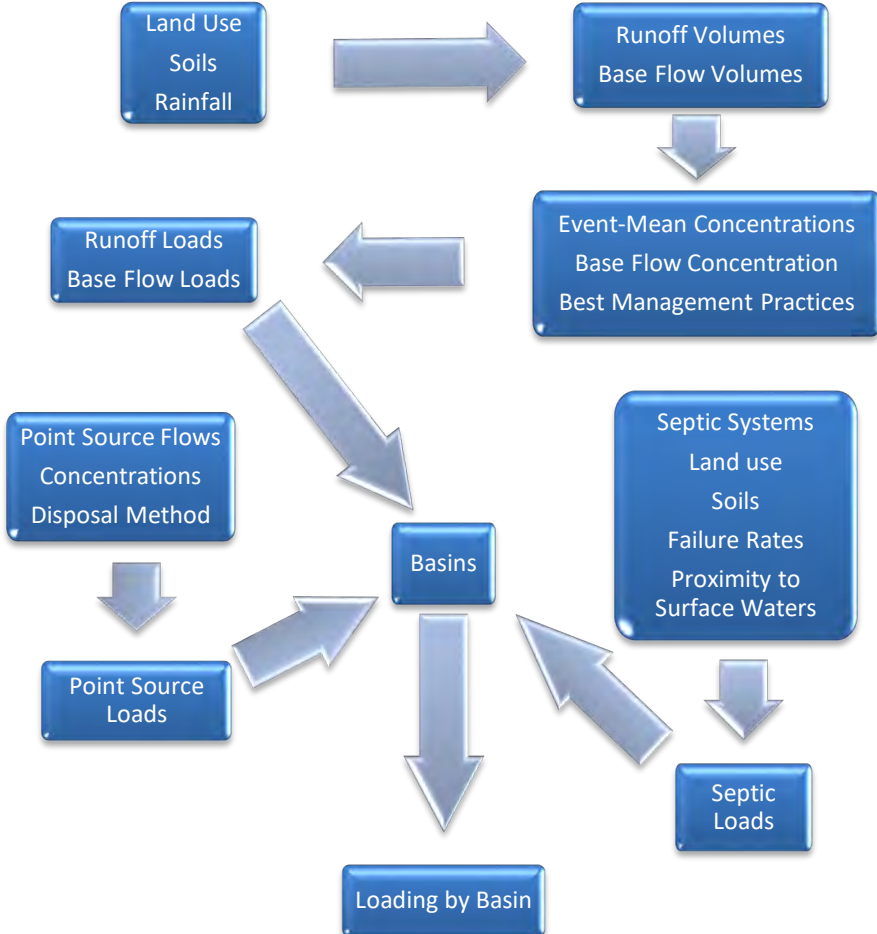
Table 2: Efficiencies for provisional nonpoint source management BMPs

N/A = Not applicable

Provisional BMPs	TP % Reduction	TN % Reduction	Data Source
Public education efforts	0.25 % to 6 %, depending on extent of program and 4 specific ordinance types	0.25 % to 6 %, depending on extent of program and 4 specific ordinance types	Evaluation of Center for Watershed Protection. 2002. Watershed Treatment Model Version 3.1. Separate calculation spreadsheet available
Fertilizer cessation or fertilizer reduction	Based on acreage previously fertilized, fertilization rates, and fertilizer composition	Based on acreage previously fertilized, fertilization rates, and fertilizer composition	Determined on case-by-case basis (see Orange Creek Basin BMAP for example)

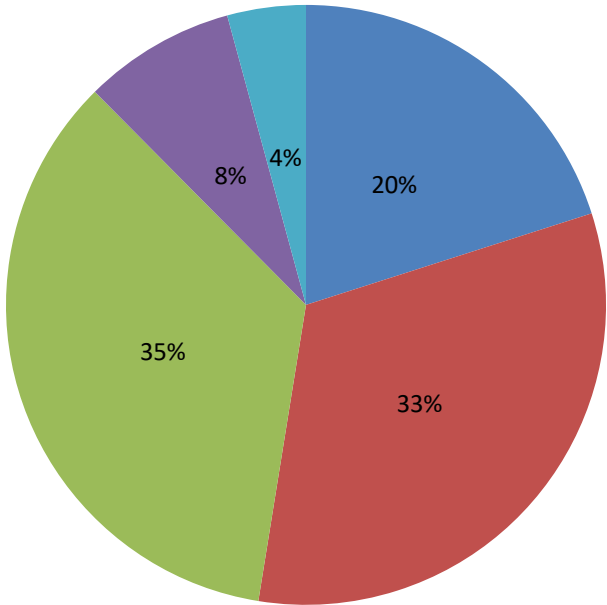
Existing Conditions – Load Accounting

Spatially Integrated Model for Pollutant Loading Estimates (SIMPLE) - Seasonal



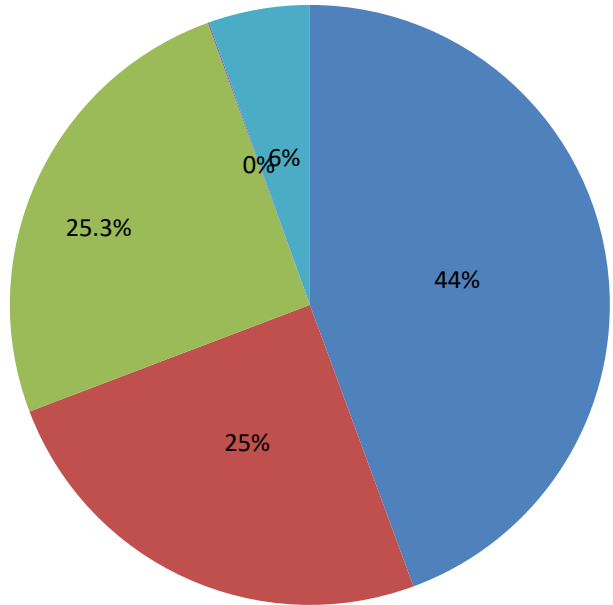
Existing Conditions - Understanding Pollutant Sources

TN for North Lagoon (ENR 1) (2004-2015)



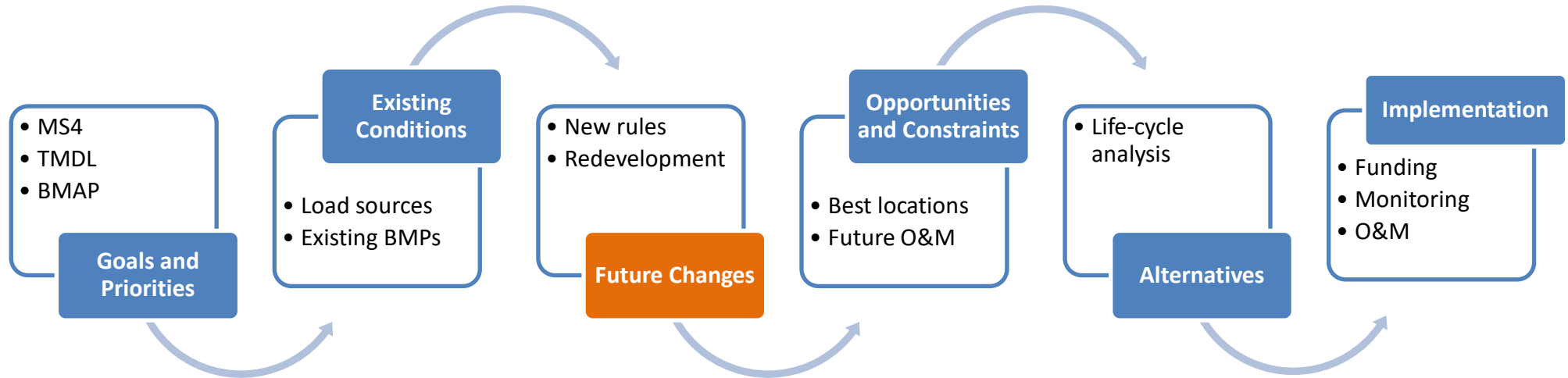
■ Atmospheric Deposition ■ Baseflow ■ Direct Runoff ■ Point Source ■ Septic

TN for Central Lagoon (ENR 2) (2004-2015)



■ Atmospheric Deposition ■ Baseflow ■ Direct Runoff ■ Point Source ■ Septic

Overall Planning Strategy



Future Changes – Old Rules

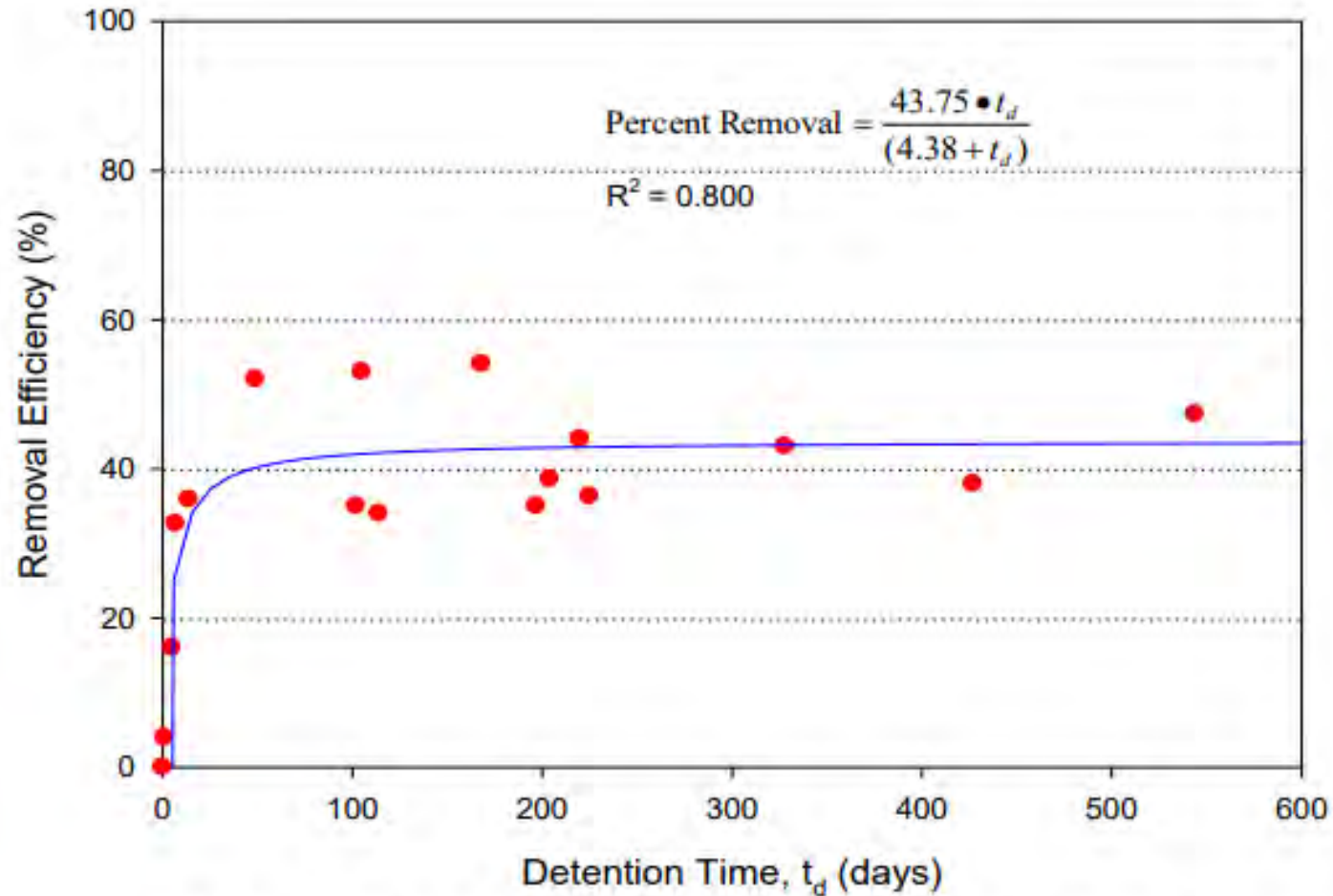


Figure 2: Wet detention removal efficiency curve for TN

8.3.2 Minimum Performance Standards for all sites

Except as provided below, all stormwater treatment systems shall provide a level of treatment sufficient to accomplish the **greater** of the following nutrient load reduction criteria:

- (a) an 80% reduction of the average annual loading of total phosphorus (TP) and total nitrogen (TN) from the post-development project land use; or
- (b) a reduction such that the post-development average annual loading of nutrients does not exceed the predevelopment nutrient loading.

Future Changes – Proposed Rules

2. Stormwater treatment systems that fall within a HUC 12 where a Total Maximum Daily Load (TMDL) has been adopted shall provide the level of treatment sufficient to accomplish the greater of the following nutrient load reduction criteria:

(a) the level of stormwater treatment required in Section 8.3.4.1, as applicable; and

(b) the greater of:

1. **Net improvement** for the pollutant that is not meeting water quality standards; or

2. the **percent reduction**, where specified in the load allocation of an adopted TMDL for the pollutant(s) that is not meeting water quality standards.

(c) **Load reduction for nutrients shall not be lower than that for undeveloped or natural conditions.**

Future Changes – Proposed Rules

Alternative Performance Standards for Redevelopment

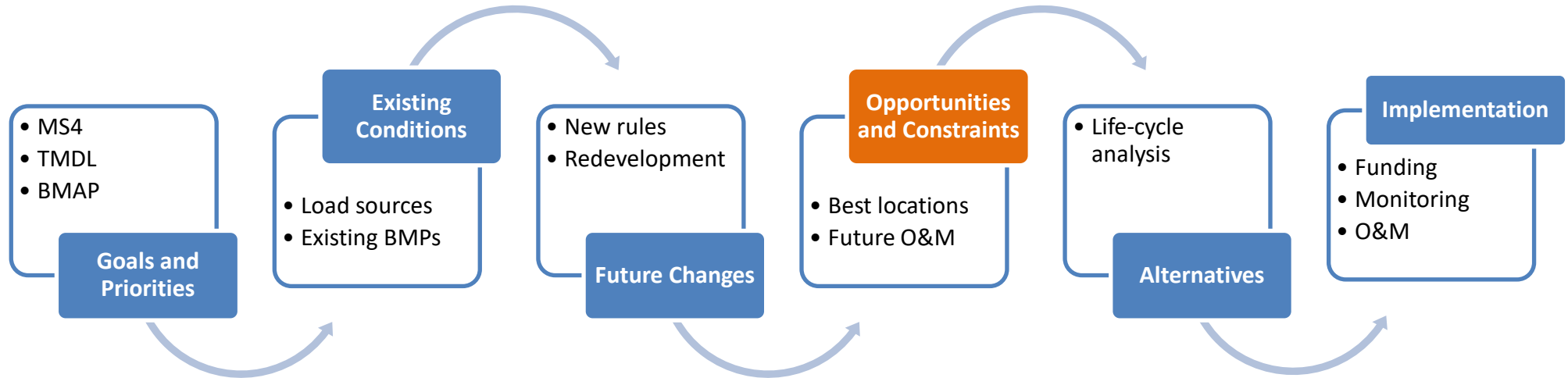
Stormwater treatment systems serving redevelopment activities shall meet the appropriate minimum level of treatment set forth above in 8.3.2 - 8.3.4.

However, an applicant may request approval by the Agency of a lower level of treatment if the redevelopment project is under five acres and does not discharge to a nutrient impaired waters. The minimum level of treatment allowable for these sites shall be as follows:

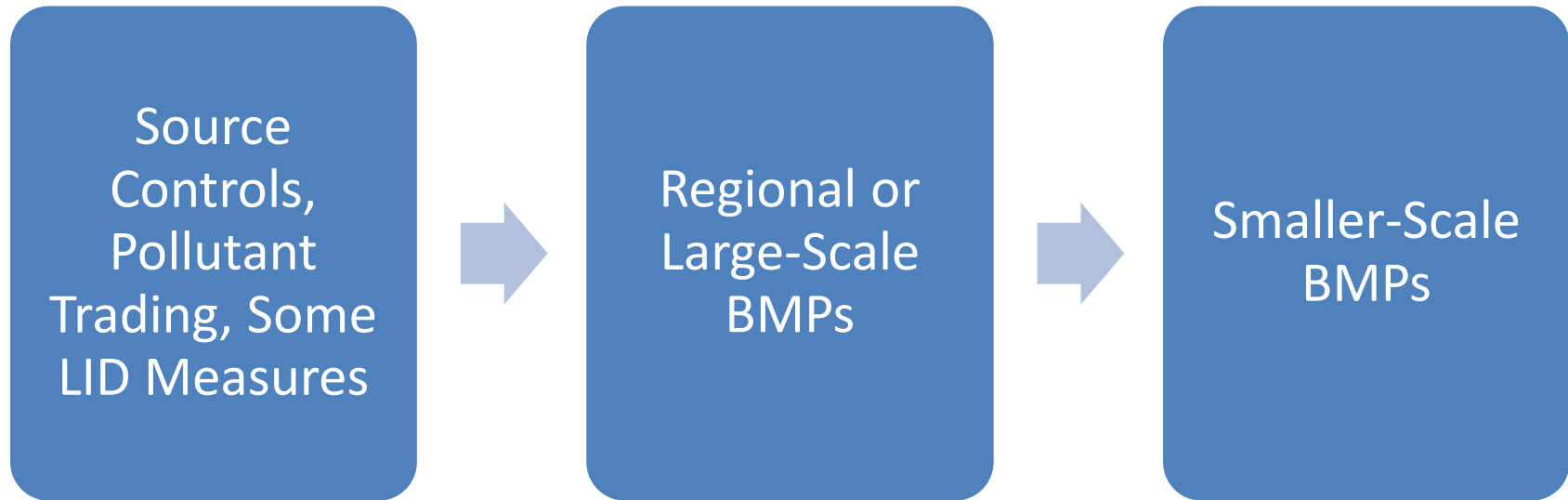
(a) **an 80% reduction of the post-development average annual loading of TP and a 45% reduction of the post-development average annual loading of TN from the project; or**

(b) for stormwater systems that fall within a HUC 12 containing an OFW, a 95% reduction of the post-development average annual loading of total phosphorus (TP) and a 50% reduction of the post-development average annual loading of total nitrogen (TN) from the project.

Overall Planning Strategy

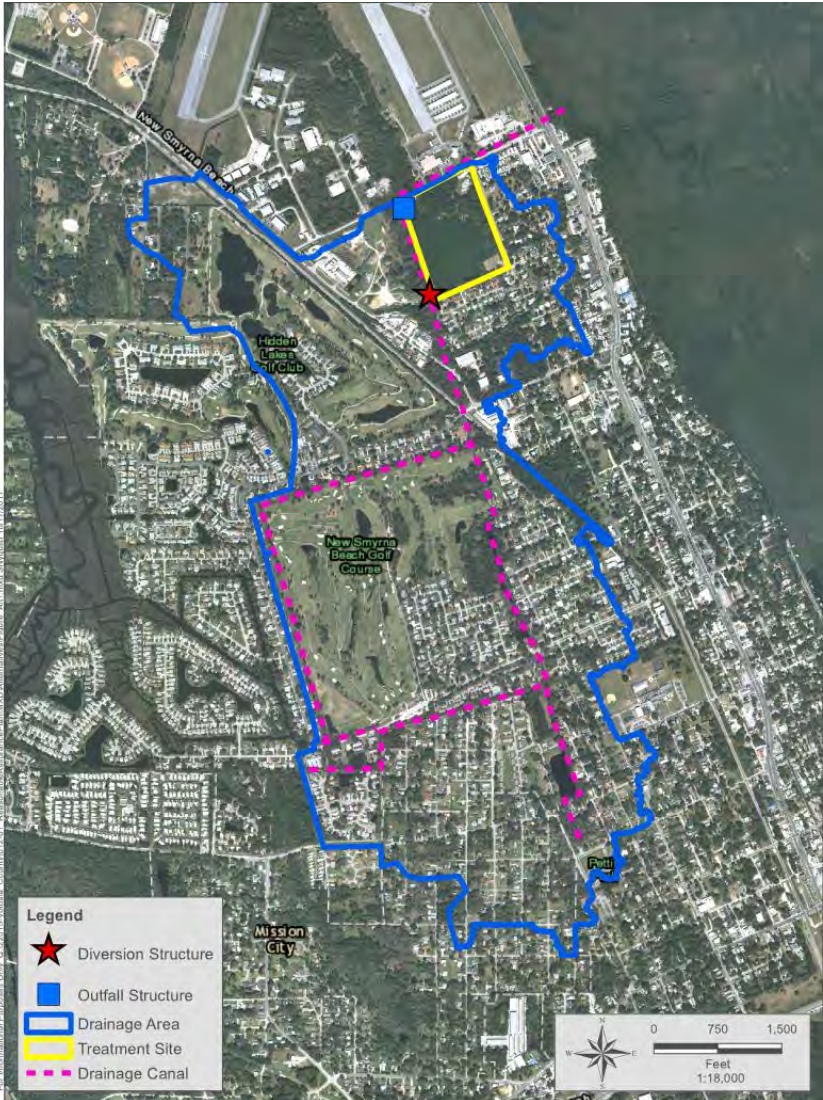


Opportunities and Constraints - Exhaust Least-Cost Options First



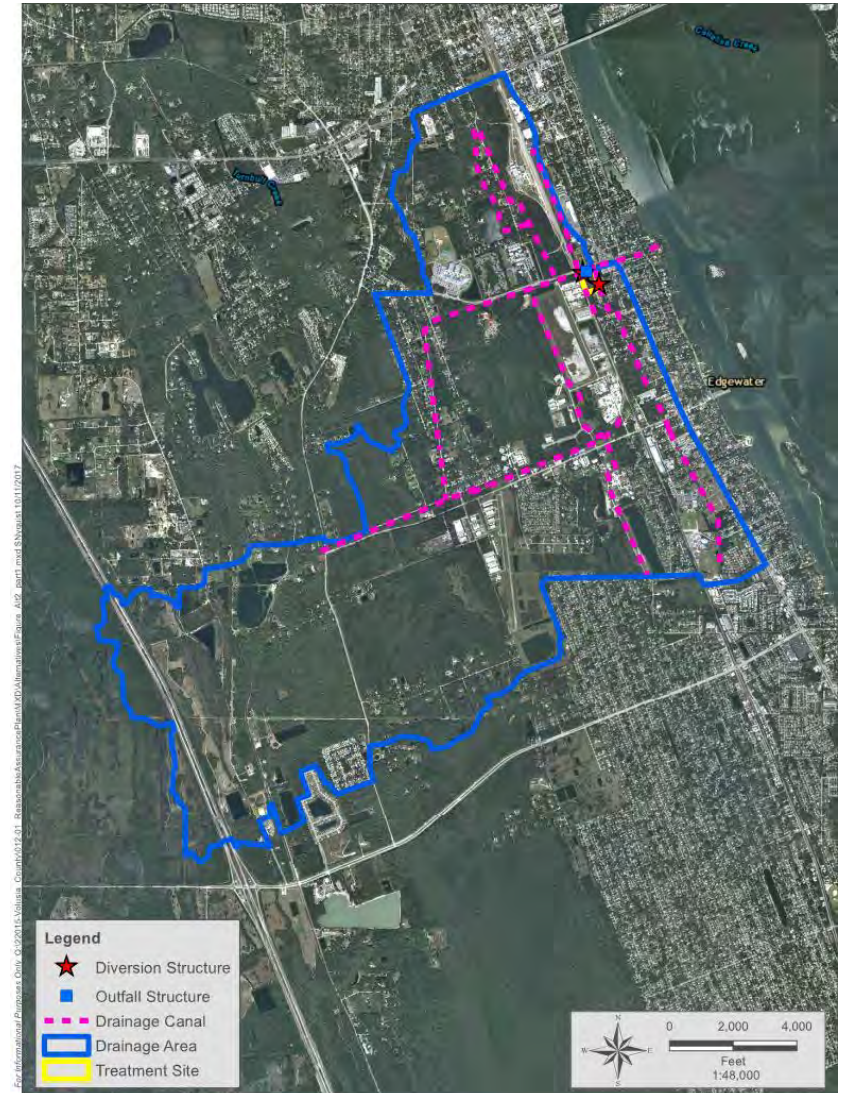
Option 1: Diversion to Borrow Pit South

**Base Flow and Runoff
Treats 640 acres
1,300 lb/yr TN
\$20/lb TN**



Option 2: 10th Street Treatment Facility

Base Flow and Runoff
Treats 4,600 acres
5,600 lb/yr TN
\$20/lb TN



Option 10: Lighthouse Cove Treatment Facility

**Base Flow and Runoff
Treats 420 acres
760 lb/yr TN
\$80/lb TN**



Stormwater Master Plan Projects

**\$140,000 to
\$325,000**

3 – 12 acres

4 - 95 lb/yr TN

**\$150 to
\$1,500/lb TN**



**THIS IS NOT FOR
NEW
DEVELOPMENT!**



Planning of Individual BMPs

Lowest \$/lb-removed life cycle costs

Permitting and water quality reasonable assurance

O&M and sustainability considered

Consideration of grant funding

Awareness of multiple purposes

Optimizing BMP Design

What is Treated?

How Much is Treated?

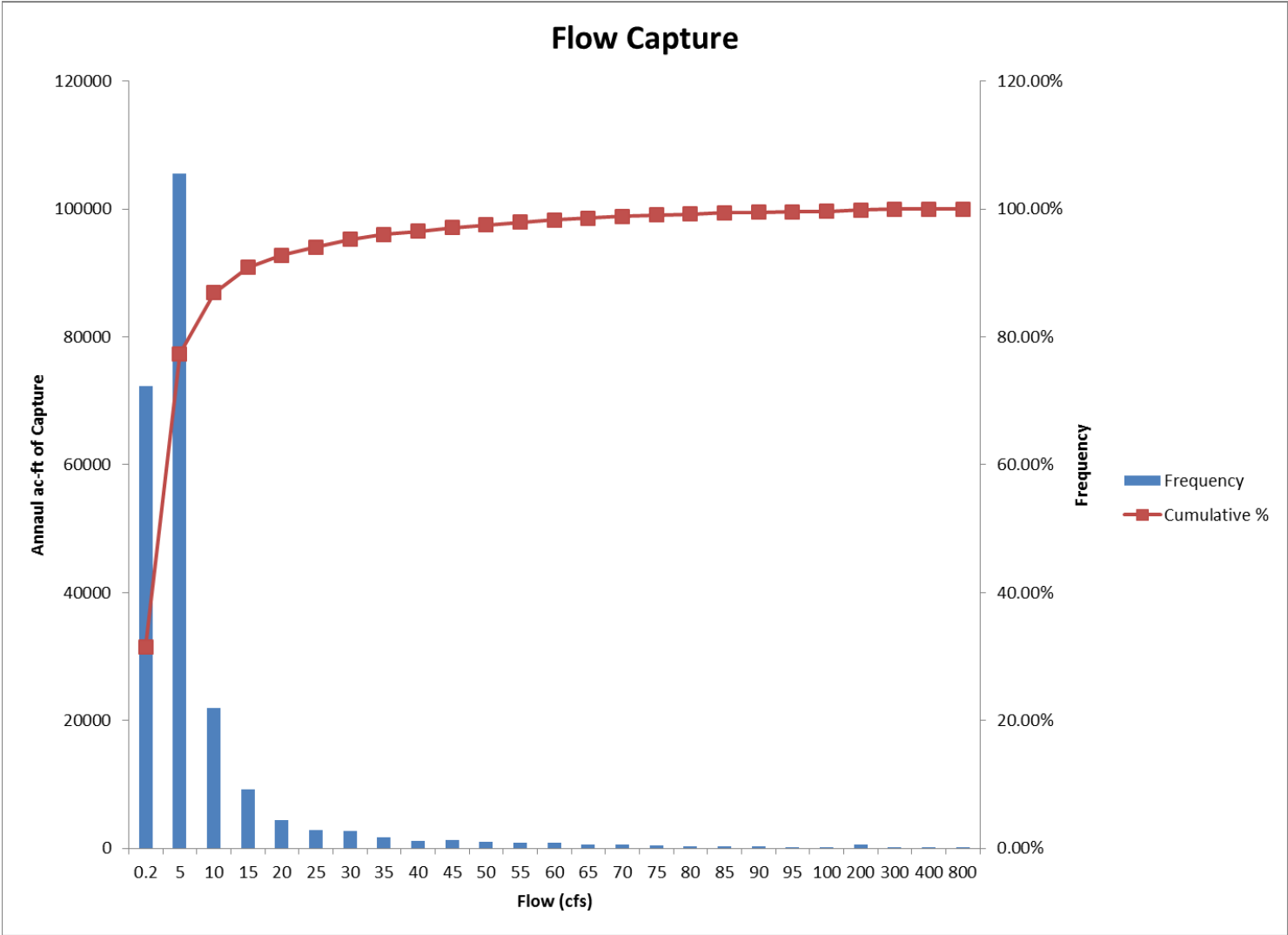
What Treatment Technologies Should Be Used?

What Level of Treatment Should Be Provided?



Site-Specific Optimization

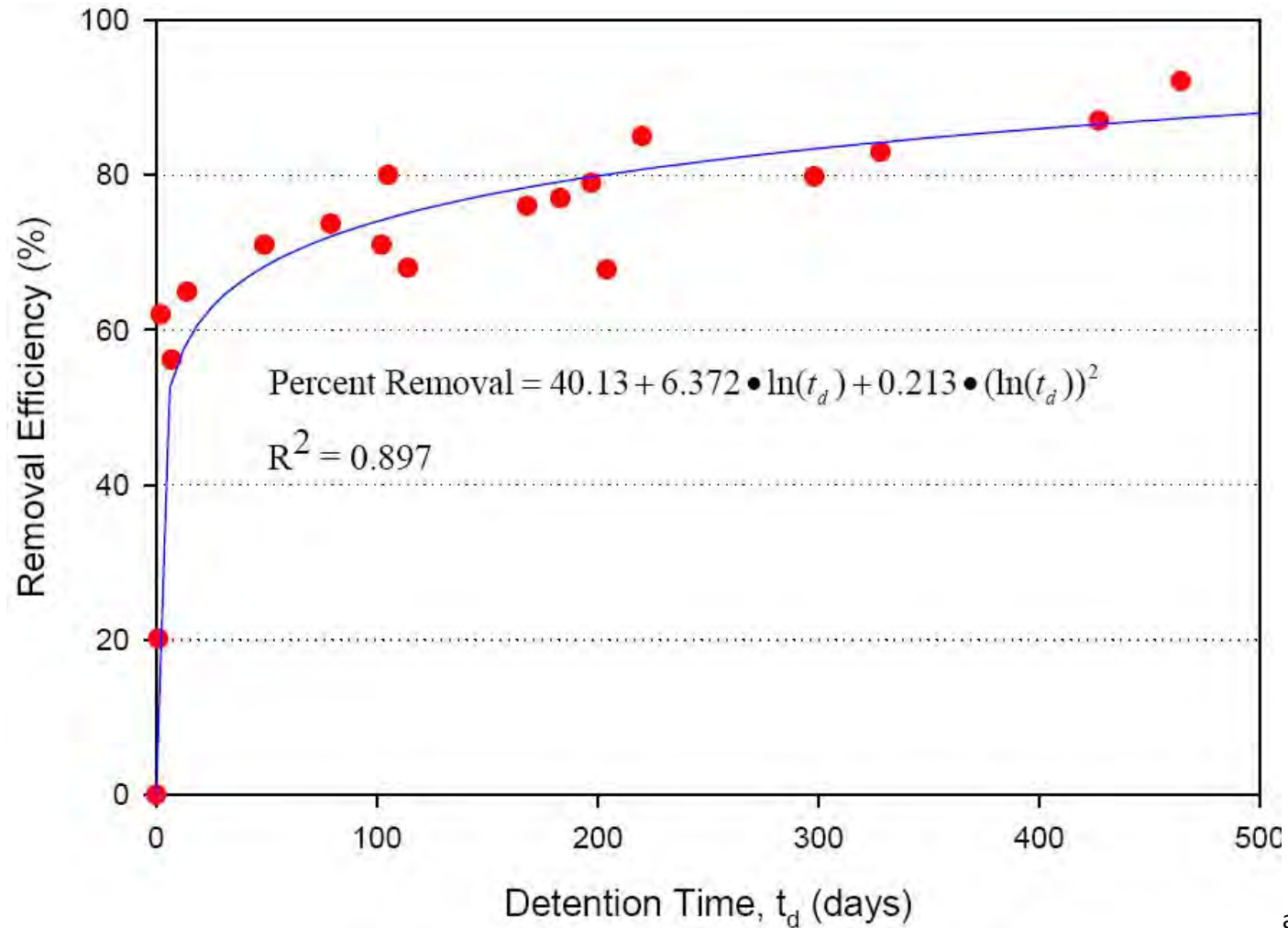
How Much is Treated?



What Treatment Technologies Should Be Used?



What Level of Treatment Should Be Provided?

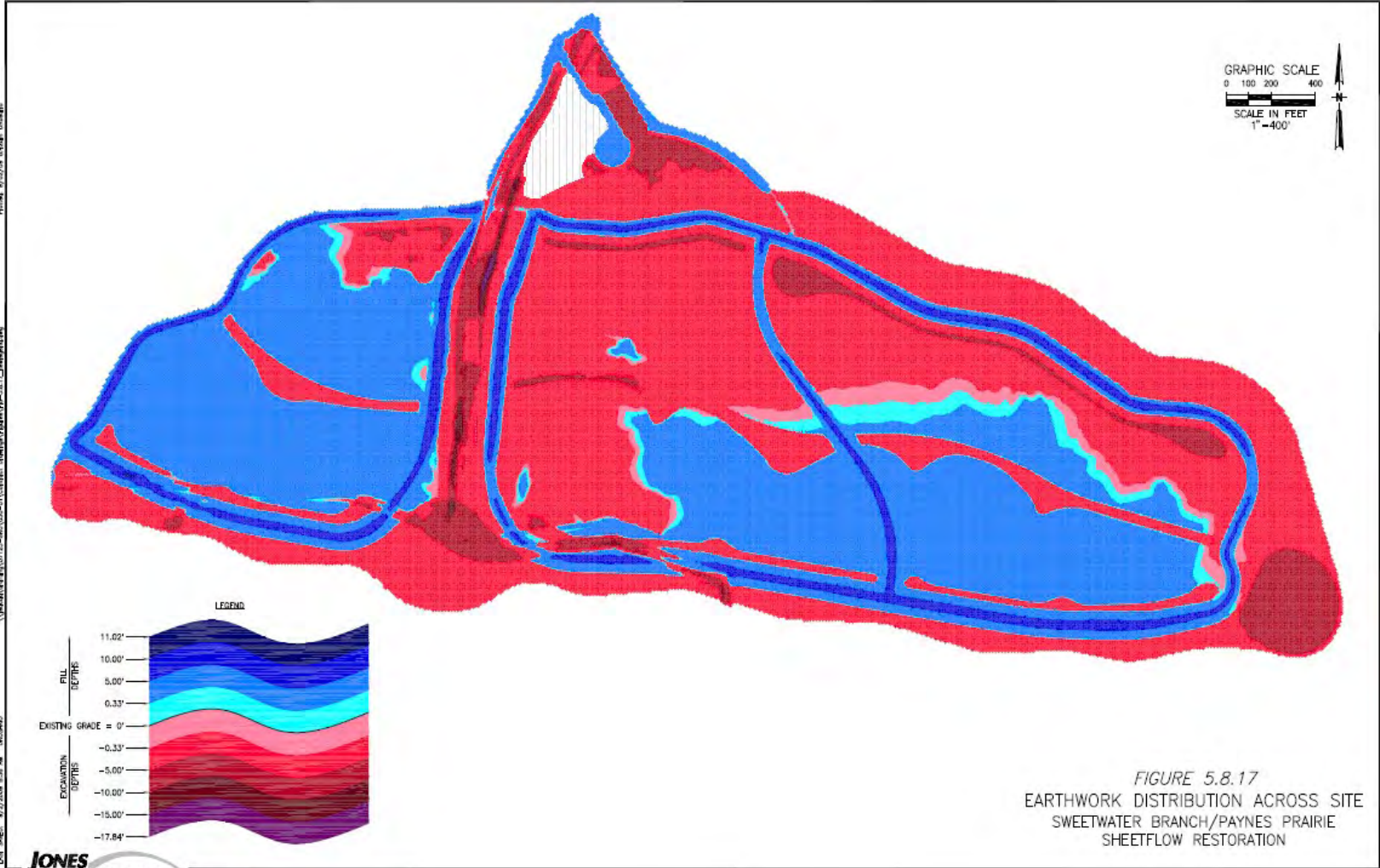


aker, 2007

Site-Specific Optimization



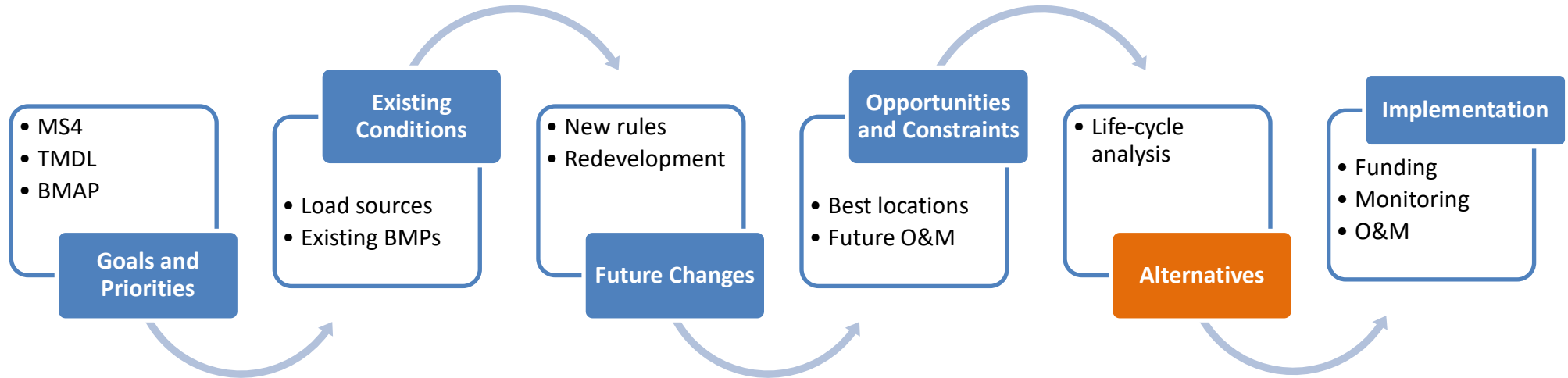
Site-Specific Optimization



Evaluating Across Multiple Areas of Responsibility



Overall Planning Strategy



**Capital costs ÷ Annual load reductions
projected over economic life (\$/lb)**

**Annual O&M costs ÷ Annual load
reductions (\$/lb)**

Capital + O&M (\$/lb)

Treatment Train Removal Efficiencies

BMP Type	Standard BMPs	TP % Reduction	TN % Reduction	Data Source
	<p align="center">BMP treatment trains using a combination of BMPs</p>	<p align="center">BMP Treatment Train equation: $\text{Efficiency} = \text{Eff1} + ((1 - \text{Eff1}) * \text{Eff2})$ or BMPTRAINS model 2020 or newer</p>	<p align="center">BMP Treatment Train equation: $\text{Efficiency} = \text{Eff1} + ((1 - \text{Eff1}) * \text{Eff2})$ or BMPTRAINS model 2020 or newer</p>	<p>March 2010 draft DEP and WMDs <i>ERP Stormwater Quality Applicant's Handbook</i> and 2020 or newer UCF Stormwater Management Academy BMPTRAINS model</p>

Solids settling/removal

Mass removal

Biological uptake

Biological/chemical transformation

Adsorption

Treatment Train Removal Efficiencies

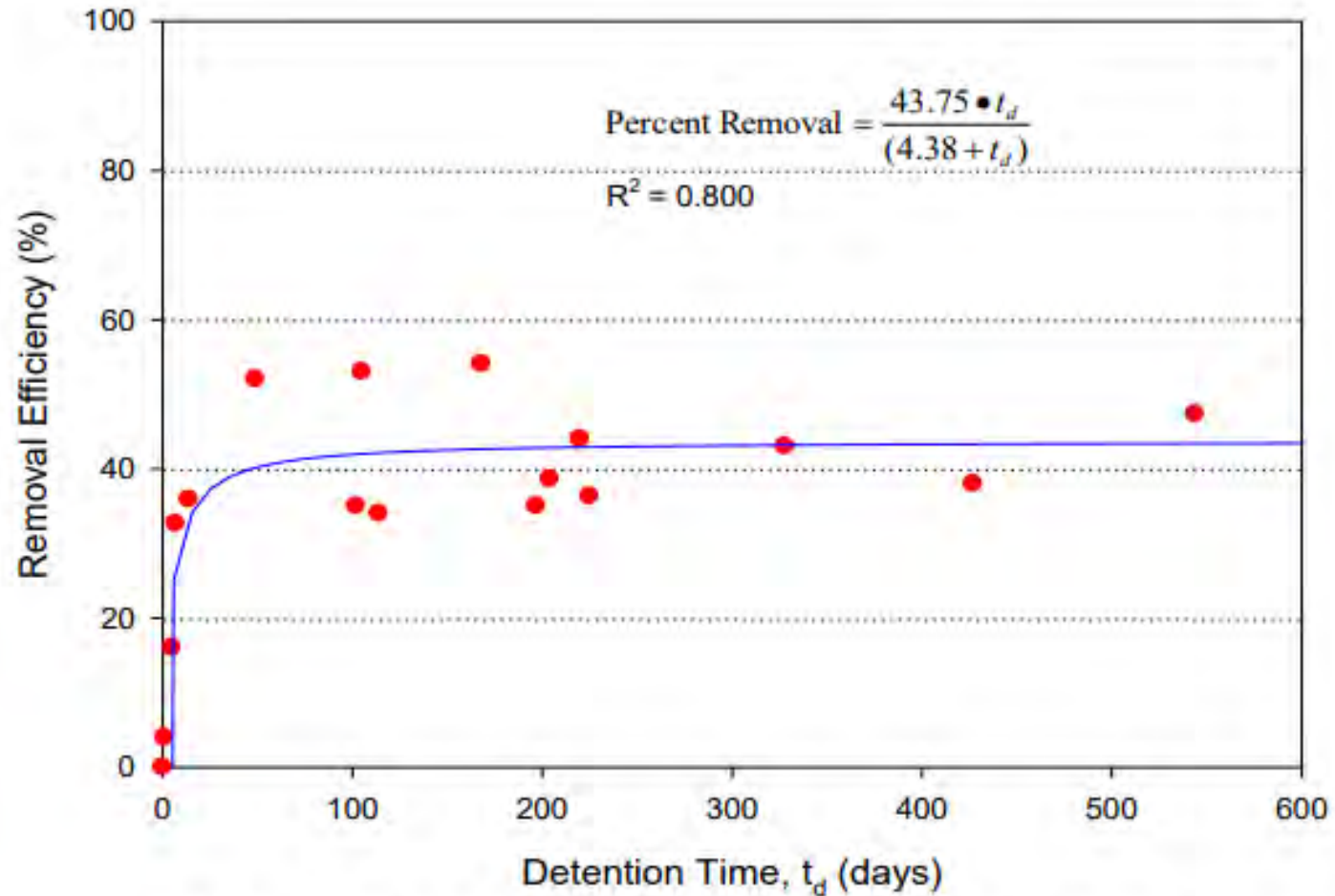


Figure 2: Wet detention removal efficiency curve for TN

Overall Planning Strategy

