

Post Construction Water Quality Training: New Regulations

Understanding and Complying with New Water Quality Regulations for Development and Redevelopment Projects

December 6, 2017

Agenda

9:15	Check-in / Registration
9:40	Introduction
9:50	Reedy River Water Quality Group Update and Effects on County Requirements
10:20	Context of New Water Quality Regulations
10:50	BREAK
11:05	Modeling Study Results and Implications
11:30	New Water Quality Regulation Roll Out
12:00	LUNCH
12:45	Revisions to the Stormwater Management Design Manual
1:15	Updates from Land Development Staff
2:45	Questions & Answers

Reedy River – Recent Landmark Events/Regulations

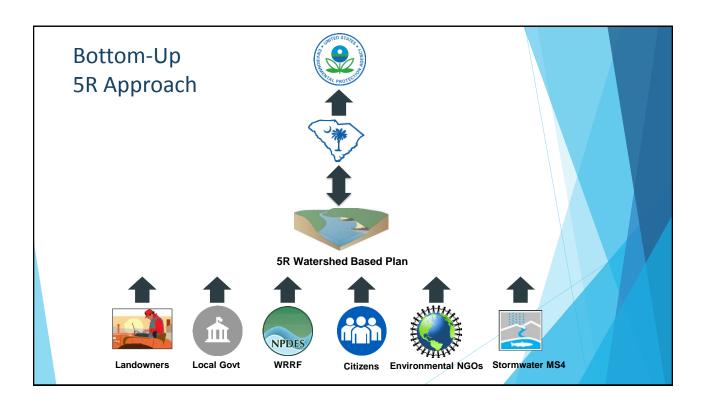
- 1. 1996 Colonial Oil pipeline failure
- 2. 1999 Lake Greenwood algal bloom
- 3. 2000 Greenville County becomes MS4 permittee
- 4. 2006 City of Greenville becomes MS4 permittee
- 5. 2008 DHEC issues draft nutrient TMDL
- 6. 2015 Upstate stakeholders form the RRWQG



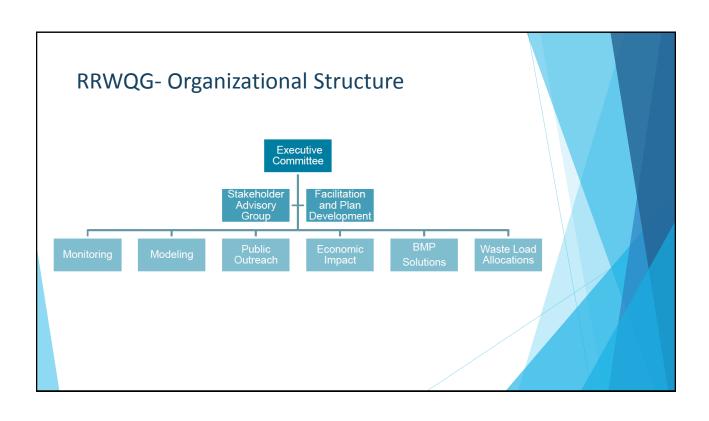


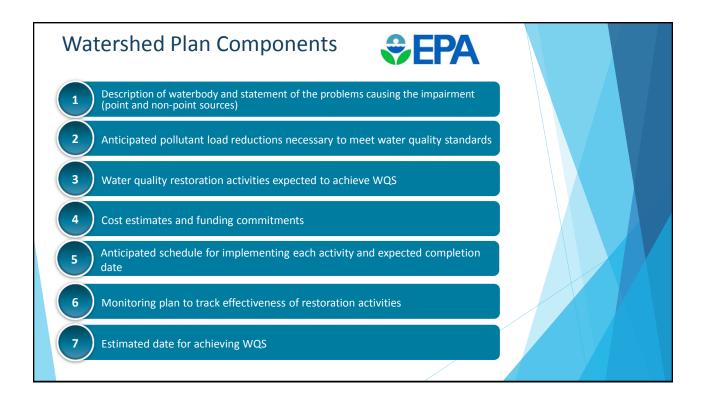
Concepts Driving 5R Process

- 1. Recognize and encourage local watershed restoration efforts
- 2. Builds partnerships and encourages collaboration
- 3. Empowers those with a responsibility to reduce loading and decide how WQS will be achieved
- 4. Acquire practical information for water quality advancements
- 5. Expedites implementation of watershed restoration

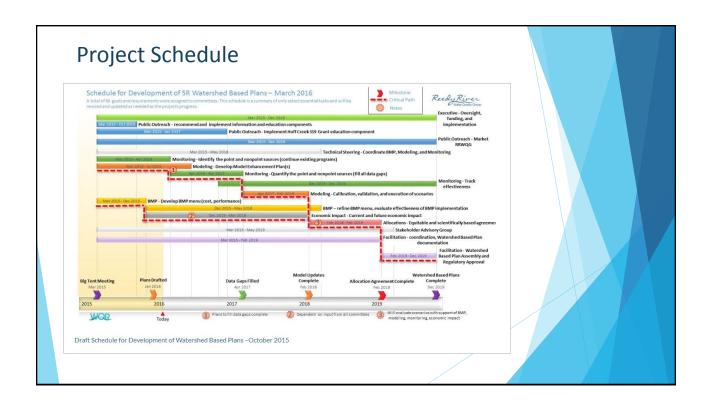








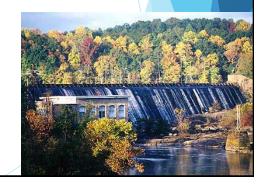




RRWQG- Current Status

- 1. Regular sub-committee and executive committee meetings
- 2. Public education/outreach, primarily through social media
- 3. Revised watershed-wide model development
- 4. On-going monitoring and sampling/data collection
- 5. Economic impact evaluation
- 6. BMP implementation and planning

Primary focus on TN with secondary focus on TP...



Context of New Water Quality Regulations

Why not Nitrogen?

- Nitrogen accounts for 78% of the atmosphere making it ubiquitous
- It comes to the aquatic ecosystem from everywhere
 - Wet fall
 - Dry fall
 - Point sources
 - Non-point sources
 - Surface exchanges

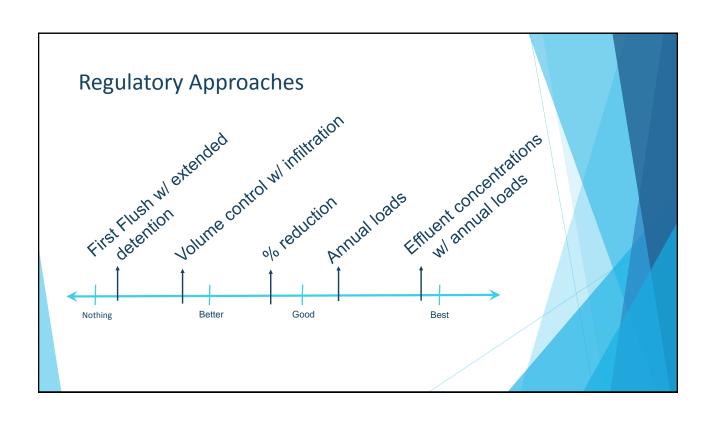
Why Phosphorus?

- It is a fundamental element that is essential for life
- Limiting nutrient for growth due to excess availability of other constituents
- More controllable
- An excess amount of phosphorus in aquatic ecosystems could result in eutrophication
 - Eutrophication could result in excessive production of autotrophs, especially algae and cyanobacteria
 - The high productivity leads to bacterial activities and high respiration rates, leading to hypoxia and stratification of dissolved oxygen downstream lakes
 - ▶ Low dissolved oxygen causes loss of aquatic life
 - Degradation of the aquatic life causes further decrease in dissolved oxygen and release of phosphorus which further exacerbates the eutrophication process

Post Development Standards

EPA's Stated Goal

- ▶ Reduce, through regulation, the impacts of new development and redevelopment storm water runoff to the Nation's waters. – EPA NPDES website
- ► How?
 - ▶ "Require completed projects to be designed, built, and maintained so as to retain the sites' pre-development hydrologic characteristics to the extent technically feasible" – NRC publication - "Urban Stormwater Management in the United States", October 15, 2008
- ▶ What?
 - Make the developed site act like it did before it was developed



Basis for Performance Standard	Description	Performance Standard	
Rainfall	Minimum storm volume to be retained on site.	Design, construct, and maintain stormwater management practices that manage ratifall on-site, and prevent the off-site discharge of the precipitation from [insert standards, such as "the first one inch of ratifall from a 24-hour storm preceded by 48 hours of no measurable precipitation"]. Discharge volume reduction can be achieved by canopy interception, soil amendments, evaporation, ratifall harvesting, engineered infiltration, extended filtration and/or evaportanspiration and any combination of the aforementioned practices. This first one thich of ratifall must be 100% managed with no discharge to surface waters, except when the permittee chooses to implement the conditions in Part 5.2.5.d below	
Rainfall	Minimum storm size to be retained on site.	Design, construct, and maintain stormwater management practices that manage ratifall on-site, and prevent the off-site discharge of the precipitation from all ratifall events less than or equal to [insert standards, such as "the 95th percentile ratifall event"]. This objective must be accomplished by the use of practices that infiltrate, evapotranspire and/or harvest and reuse ratinvater. The 95th percentile ratifall event is the event whose precipitation total is greater than or equal to 95 percent of all storm events over a given period of record.	
Recharge/Runoff	Hydrologic analysis.	Design, construct, and maintain stormwater management practices that preserve the pre-development runoff conditions following construction. The post-construction rate, volume, duration and temperature of discharges must not exceed the pre-development rates and the predevelopment hydrograph for 1, 2, 10, 25, 50 and 100 year storms must be replicated through site design and other appropriate practices. These goals must be accomplished through the use of infiltration, evapotranspiration, and/or rainwater harvesting and reuse practices. Defensible and consistent hydrological assessments and modeling	

Recharg	re Groundwater recharge requirement.	methods must be used and documented. Any "major development" project, which is one that disturbs [insert standards, such as at least one (1) acre of land or creates at least 0.25 acres of new or additional impervious surface], must comply with one of the following two groundwater recharge requirements: • Demonstrate through hydrologic and hydraulic analysis that the site and its stormwater management measures maintain 100 percent of the average annual pre-construction groundwater recharge volume for the site; or	
	Pollutant Lord Hadra large to have	Demonstrate through hydrologic and hydraulic analysis that the increase of stormwater discharges volume from pre-construction to post-construction for the two-year storm is infiltrated.	
Annual 2	Pollutant Load Hydrologic Analysts Loading Calculations	Design, construct and maintain stormwater management practices that preserve the pre-development runoff conditions following development. Post construction annual pollutant loads are not allowed to exceed pre-development levels. Whenever and wherever appropriate, runoff volume and peak discharge rates for specific design storms should be taken into account as well. These goals will be accomplished through low impact development practices (LID) including impervious cover limitations and treatment means. Water quality modeling methods used to support establishment of this standard must be defensible and be consistent with the MEP standard, to protect water quality and to satisfy the appropriate water quality requirements of the CWA*.	

EPA Performance Standard Examples

- ▶ Minimum storm volume to be treated on site (first flush approach)
 - "...the first one inch of runoff from a 24-hour storm..."
- Example: SC Reg. 72-300

Strengths	Weaknesses
Simple to calculate	No direct connection to pollutants of concern
Better than nothing	No accounting of pollutant removal
	No incentive to reduce impervious area
	Doesn't allow TMDL restrictions
	Oversimplified approach to a complicated problem

EPA Performance Standard Examples

- Minimum storm size to be retained on site
 - "...the 95th percentile rainfall event..."
- Examples: EISA, Beaufort County, SC, State of Maryland, Georgia Blue Book

Strengths

Not complicated to calculate

Incentivizes the reduction of impervious area

Weaknesses

No published 95th percentile rainfall depths

No direct connection to pollutants of concern

No accounting of pollutant removal

Doesn't allow TMDL restrictions

Oversimplified approach to a complicated problem

Assumes the 95th percentile storm infiltrates in predeveloped conditions for all sites

- steep and rocky areas
- high groundwater table
- clay soils

EPA Performance Standard Examples

- Post-development hydrology ≤ pre-development hydrology
 - "...preserve pre-development runoff conditions for rate, volume, duration, and temperature of discharges for the 1, 2, 10, 25, 50, and 100-year storms..."
- Examples: Church Creek watershed in Charleston, SC

Strengths

Acknowledges direct connection between predevelopment and post-development hydrologic conditions

Incentivizes the reduction of impervious area

Incentivizes redevelopment

Good flood mitigation approach

Weaknesses

No direct connection to pollutants of concern

No accounting of pollutant removal

Doesn't allow TMDL restrictions

Ignores pollutants from most storm events because water quality BMPs designed for large storm events do not necessarily work for small storm events

EPA Performance Standard Examples

- Groundwater recharge
 - "...demonstrate through H&H analysis that the site maintains 100% of the average annual pre-construction groundwater recharge volume..."
- Examples: Connecticut and New Jersey

Strengths

Acknowledges direct connection between predevelopment and post-development hydrologic conditions

Incentivizes the reduction of impervious area

Promotes groundwater recharge

Weaknesses

No direct connection to pollutants of concern

No accounting of pollutant removal

Nearly impossible to calculate percentage of infiltrated runoff contributing to groundwater recharge

Doesn't allow TMDL restrictions

Promotes recharging the groundwater table with polluted water

Other Approaches

- % Removal of Sediment (TSS)
 - On an annual weight basis
- Example: Greenville County

Strengths

Numerically based reduction calculated

Allows for site specific conditions to be taken into account

Allows design characteristics of BMPs to be taken into account

Allows use of Manufactured Treatment Devices (MTDs) in site design

Promotes Low Impact Development (LID) techniques & practices

Weaknesses

No direct connection to other pollutants

Arbitrary reduction of varying loads

Does not incentivize reduction of pollutant generation

Doesn't allow additional TMDL restrictions

Other Approaches

- Annual loading
 - ▶ Annual loading requirement with predefined BMP removal rates
- Examples: Virginia's Runoff Reduction Method (Chesapeake Bay TMDL), State of NC (Jordan Lake and Falls Lake Rules), Florida's Harper Method

Weaknesses	
Restricts design alternatives	
Doesn't take BMP or individual site characteristics into account	
Can't be used for complex sites	
Requires extensive design criteria	
Doesn't allow additional TMDL restrictions	

EPA Performance Standard Examples

- Post-development POC loading ≤ pre-development POC loading
 - "...post-construction annual pollutant loads are not allowed to exceed predevelopment levels for pollutants of concern..."
- Examples: OCRM and SCDHEC Antidegradation Policy, Greenville County (beginning 2018)

Strengths	Weaknesses
Deals directly with pollutants of concern	More complicated to calculate
Allows for site specific conditions to be taken into account	More complicated to regulate
Less controversial (policy driven)	
Allows design characteristics of BMPs to be taken into account	
Overly prescriptive design standards are not needed	
Facilitates TMDL restrictions	

Feasibility Study

Study Method

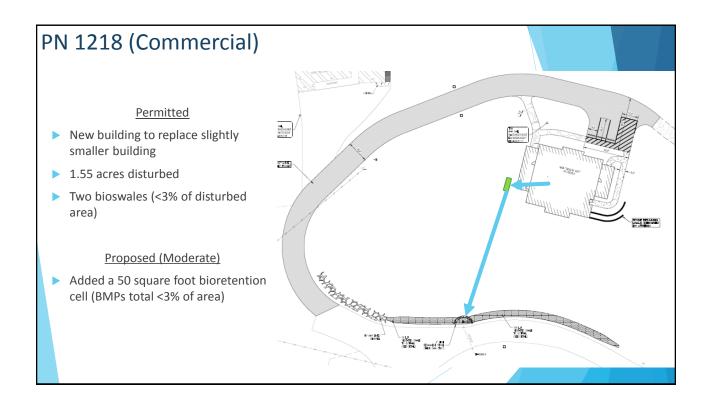
10 randomly-chosen project sites that were permitted meeting the 85% TSS Trapping Standard or Alternative TSS Standard

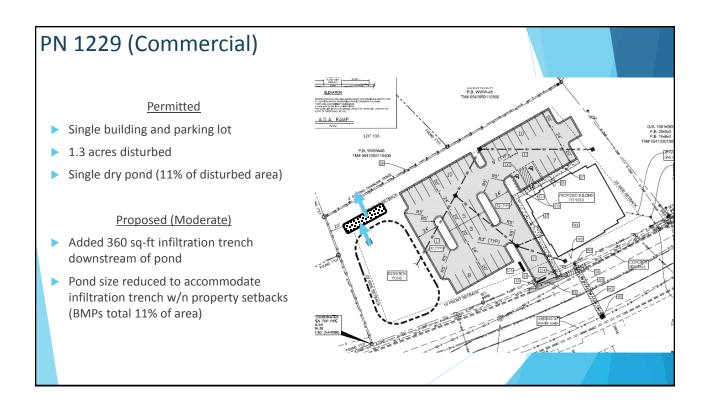
Development	Greenville County	Area	Area
Type	Project Number	Disturbed	Modeled
	1307	1.4	1.4
Commercial	1218	1.6	1.6
Commercial	1229	1.3	1.3
	1276	17.4	17.4
	1296	46.9	81.2
	1264	7.9	7.9
Residential	1261	47.7	196.5
	1288	23.4	23.4
	1294	6.2	6.2
Institutional	1231	3.3	3.3

Study Method

- Proposed Standard: no net increase in TP loading from predevelopment conditions
- ▶ Built pre-development and post-development IDEAL models based on original design submittals
- Used incremental modifications, but did not try everything possible. A skilled designer may be able to improve on proposed design modifications.

Level of Difficulty	Description	Number of Sites
No Modifications Required	The site met the proposed TP standard as permitted	2/10
Minimal Modifications	The existing BMPs were modified by expanding surface area up to 25% or converting to a more effective BMP	2/10
Moderate Modifications	At least one additional BMP was required, but that BMP fit within the site footprint and was relatively small	5/10
Major Modifications	More than one additional BMP was required, and/or the additional BMP(s) were relatively large and costly	1/10





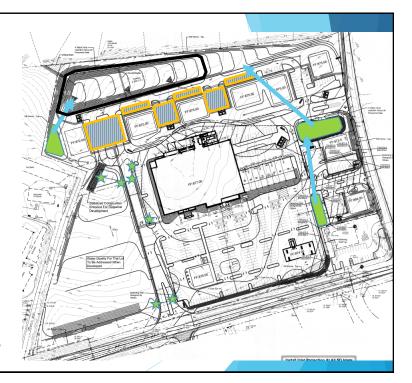
PN 1276 (Commercial)

Permitted

- Multi-building commercial & office development
- ▶ 17.4 acres disturbed
- 3 dry ponds, 7 catch basin filter inserts (6% of disturbed area)

Proposed (Major)

- 2 ponds were converted to BRCs
- Added 1,300 sq-ft BRC upstream of 3rd pond
- Proprietary biofiltration units replaced filter inserts in 7 catch basins
 - 1 ac of parking lot was converted to porous pavement (11% including porous pavement)



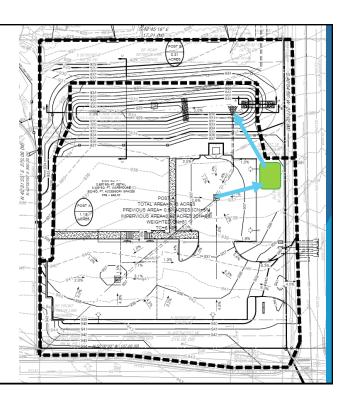
PN 1307 (Commercial)

Permitted

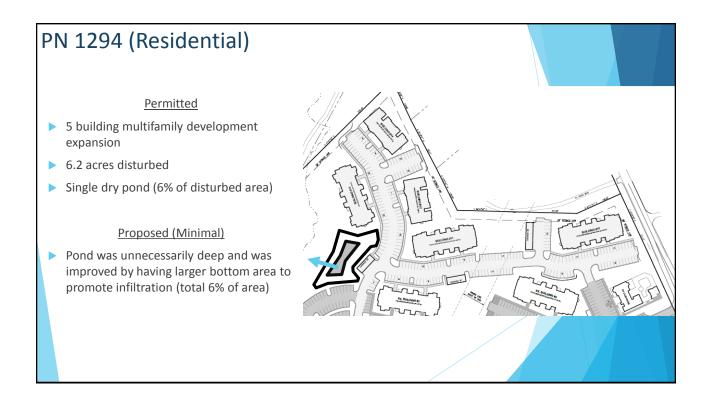
- Single building and parking lot
- ▶ 1.28 acres disturbed
- One dry detention pond (12% of disturbed area)

Proposed (Moderate)

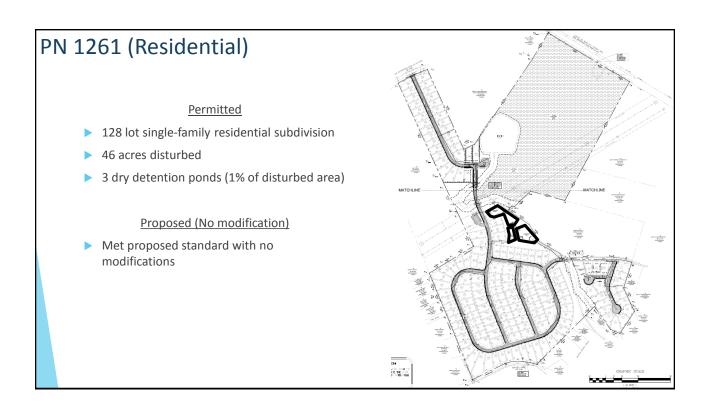
 Met proposed standard by diverting runoff into 440 sq-ft bioretention cell before planned dry pond (BMPs total 12.5% of area)



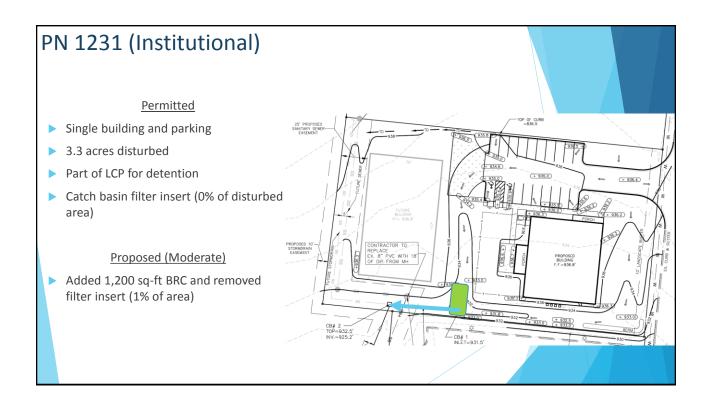
Permitted 37 lot single family subdivision 23.4 acres disturbed 2 VFS and dry pond (3% of disturbed area) Proposed (No modification) Met proposed standard with no modifications



PN 1296 (Residential) Permitted 212 lot single-family subdivision 47 acres disturbed Wet pond and 2 VFSs (5% of disturbed area) Proposed (Minimal) Converted wet pond to dry pond with impervious forebay section (total 5% of area)

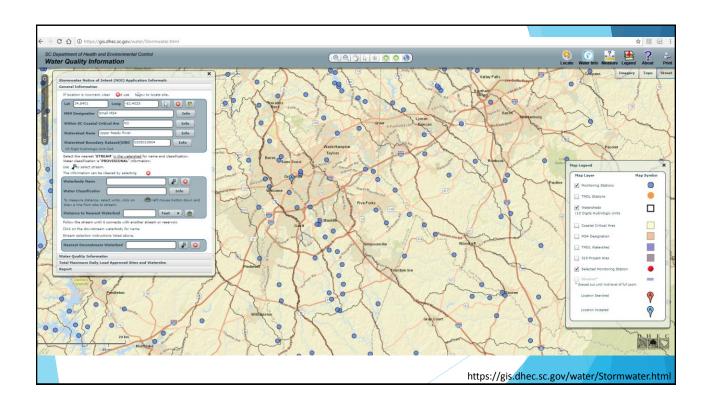


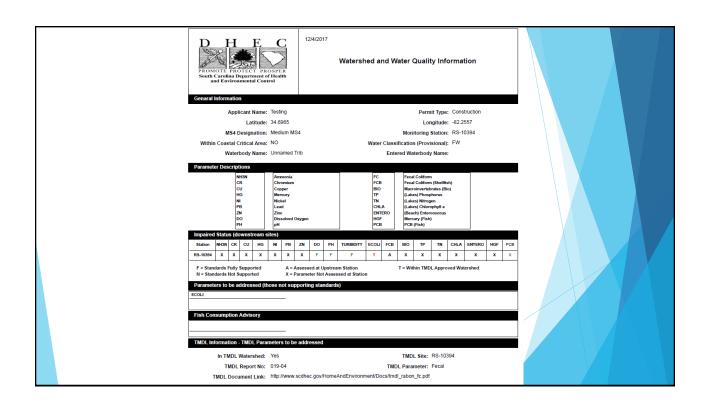
Permitted • 40 lot single family subdivision • 7.9 acres disturbed • Single dry pond (3% of disturbed area) Proposed (Moderate) • Added 2,700 sq-ft BRC to grassed area • Dry pond size increased 25% (BMPs total 4% of area)



New Water Quality Requirements

Redevelopment Location	Redevelopment Characteristics*	Water Quality Requirement	
Any Developmen	t in Greenville County < 10,000 sf	None**	
Sites 10,000 square feet – 0.99 acres OR other sites meeting criteria for Alternative TSS Standard (as described in Section 9.1.4)		Ensure annual TSS load is ≤ 600 pounds per acre	
Not within the Reedy River watershed	1 – 25 acres OR ≥ 25 acres and NOT discharging to impaired waterbody (TMDL or 303d)	Trap 85% of annual Total Suspended Solids (TSS) load	
	≥ 25 acres AND Discharging to impaired waterbody	Trap 85% of annual TSS load AND Anti-degradation Rules for Pollutant of Concern (POC)	
Within the Reedy River	1 - 25 acres OR ≥ 25 acres and NOT discharging to impaired waterbody	Trap 85% of annual TSS load AND No Increase in Annual Loading for Total Phosphorus (TP)	
watershed	≥ 25 acres AND Discharging to impaired waterbody	Trap 85% of annual TSS load AND <mark>Anti-degradation Rules for TP </mark> and POC	





Calculations

- ▶ Make separate pre-development and post-development models
- ► Compare load at outlet from each model
 - ▶ Model same area in both models (IDEAL now reports total project area at outlet)
 - Offsite drainage does not have to be subtracted out since it won't change

IDEAL Output Report

Pre-development

	O	utlet 4		
Name	Outlet 4			
Description	Please enter a brief de	Please enter a brief description.		
	Annual Lo	oading Results		
Parameter		Value	Units	
Total Runoff Volur	ne	0.1099	ac-ft	
Total Drainage Are	в	1.33	ac	
Total Modeled Are	1-	1.33	ac	
Total Sediment Dis	charged	206.5	lbs	
Total Sediment Dis	charged (Clay)	6.442	lbs	
Total Sediment Dis	charged (Silt)	3.321	lbs	
Total Sediment Dis	charged (Sand)	71.91	lbs	
Total Sediment Discharged (Small Agg.)		42.1	lbs	
Total Sediment Dis	charged (Large Agg.)	82.69	lbs	
Total Sediment Yie	ld Per Acre	155.2	lbs	
Sediment Concentr	stion	19.86	mg/l	
Peak Sediment Con	centration	52.29	mg/l	
Total Nitrogen Discharged		0.2899	lbs	
Total Nitrogen Disc	harged (Particulate)	0.1247	lbs	
Total Nitrogen Disc	harged (Sorbed)	0.0005349	lbs	
Total Nitrogen Discharged (Dissolved)		0.1647	lbs	
Total Nitrogen Yiel	d Per Acre	0.218	lbs	
Nitrogen Concentra	tion	0.04924	mg/l	
Peak Nitrogen Con	centration	0.1073	mg/l	
Total Phosphorus D	ischarged	0.05978	lbs	

Post-development

	O	atlet 5		
Name	Outlet 5	Outlet 5 Please enter a brief description.		
Description	Please enter a brief de			
	Annual L	oading Results		
Parameter		Value	Units	
Total Runoff Volu	me	0.06407	ac-ft	
Total Drainage Are	ra .	1.184	ac	
Total BMP Surface	Area	0.1513	ac	
Total Modeled Are	a	1.335	ac	
Total Sediment Di	scharged	6.859	lbs	
Total Sediment Di	scharged (Clay)	4.771	1bs	
Total Sediment Di	scharged (Silt)	2.076	lbs	
Total Sediment Discharged (Sand)		6.922E-05	lbs	
Total Sediment Di	scharged (Small Agg.)	0.01243	lbs	
Total Sediment Di	scharged (Large Agg.)	1.902E-05	Ibs	
Total Sediment Yi	eld Per Acre	5.793	Ibs	
Sediment Concentration		1.768	mg/l	
Peak Sediment Con	ncentration	2.614	mg/l	
Total Nitrogen Dis	charged	0.975	lbs	
Total Nitrogen Dis	charged (Particulate)	0.1319	lbs	
Total Nitrogen Dis	charged (Sorbed)	0.0009331	Ibs	
Total Nitrogen Discharged (Dissolved)		0.8421	lbs	
Total Nitrogen Yield Per Acre		0.8235	lbs	
Nitrogen Concentr	ation	0.6346	mg/l	
Peak Nitrogen Con	scentration	44.64	mg/l	
Total Phosphorus 1	Discharged	0.05789	lbs	

Revisions to Design Manual



Chapter 3: Plan Submittal

- Updated section on flood control requirements for submittals
 - ▶ References newer County Floodplain Ordinance
 - Updated list of approved software

Chapter 9: Water Quality

- Complete re-write
- Removed unnecessary methods for calculating water quality compliance
- New Outline:
 - ▶ Requirements (starting with Table 9-1)
 - ► Tools for Compliance
 - Water Quality Background and Loading
 - Water Quality Pollutant Removal Mechanics
 - Constructed Water Quality Controls
 - ► Additional Water Quality Controls (non-structural design techniques)

Chapter 9: Water Quality

 Added section on infiltration testing requirements for BMPs relying on infiltration

9.5.1.2 Soil Testing for Infiltration BMPs

Soil testing for infiltration rates shall be performed by a licensed geotechnical engineer. The initial test elevation location shall be at the same contour elevation as the bottom/invert of the infiltration BMP.

Infiltration BMPs shall be designed on the basis of actual test data. Tests shall be consistent as to soil conditions, proposed BMP elevations, locations, and water table depths for the proposed infiltration BMP system. The following tests are typically allowable to determine infiltration rate for soils, though some BMP specifications only allow a subset of these (other test methods must be approved by the County):

- Laboratory <u>Permeameter</u> Test for saturated hydraulic conductivity on undisturbed soil samples (ASTM D 5084).
- Double Ring Infiltrometer Test to estimate the initial vertical unsaturated permeability data of the upper soil layer (ASTM D 3385).
- Constant Head Test in soils with permeability that allow keeping the test hole filled with water during the field test (AASHTO T 215).
- Falling Head Test in areas with excellent soil percolation where keeping the test hole filled with water is not feasible during the test.

The Engineer is responsible for obtaining documentation of test results and providing them to the County.

Chapter 10: Low Impact Development

- Complete re-write; used to be an extension of Ch. 9
- High-level guidance for using LID strategies to meet water quality requirements during each stage of design process
- From 2013 Chapter 10:

Low-Impact Development is a relatively new concept. It is anticipated that over the next few years many additional best management practices and improvements to the LID approach will be introduced as local agencies and designers begin to experiment with the use of the practice.

▶ LID is the "new normal"

Appendix F: During Construction EPSC Specs & Details

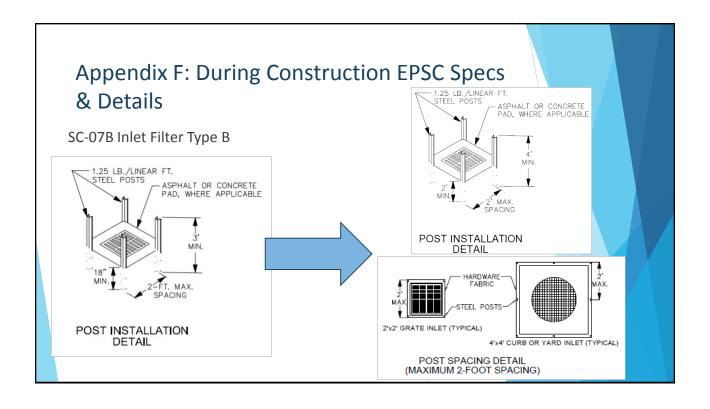
- ▶ Minor changes resulting from 2015 Construction BMP Audit
 - ► SC-03 Silt Fence
 - 1.4.4 Double Row Silt Fence

When double row Silt Fence is specified on the Plans, the same design, material, and construction requirements are applicable. Double row Silt Fence shall have a minimum spacing of 3 feet and a maximum spacing of 5 feet between the two rows.

- SC-06 Construction Entrance
 - 1.2 Materials

Provide a stabilized construction entrance composed of the following materials:

- Class 2 non-woven geotextile fabric and
- Aggregate stone No. 1, 2, 24, or 3 aggregate.



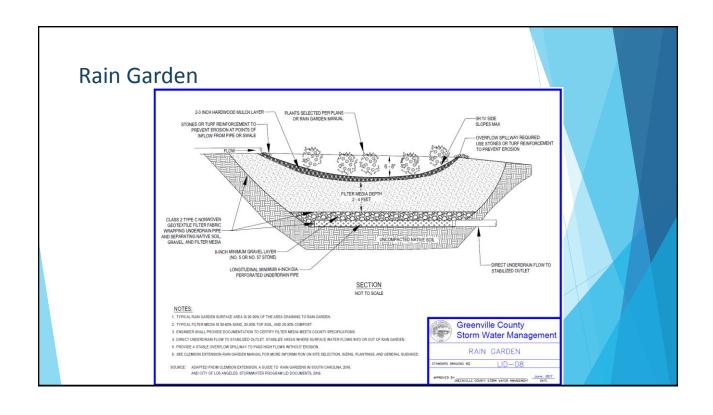
Appendix G: Post Construction WQ Suggested Uses

- ▶ Placed former Table 10-4 in this appendix
- Updated to include all BMPs
- Quick-reference for BMP selection and major requirements
 - ▶ Relative maintenance needs
 - Relative cost
 - Drainage area
 - Soils
 - Minimum size
 - Slope
 - ▶ Water table/bedrock clearance
 - Setback
 - Maximum depth

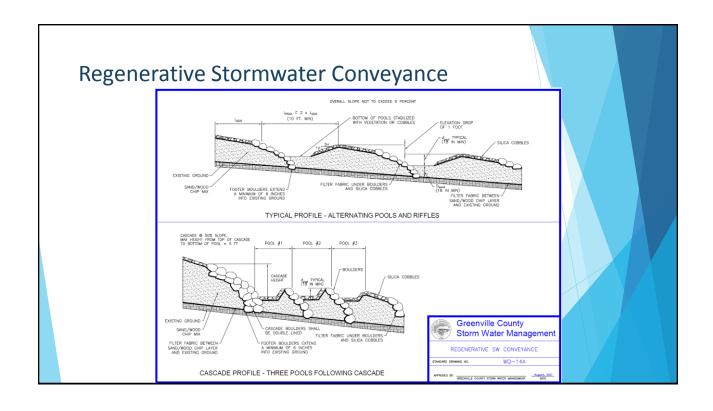
Appendix H: Post Construction WQ Specs & Details

- Pulled all BMP Specs & Details into one Appendix
- ▶ Minor changes to some BMPs
- Added section to each to explain how to model in IDEAL
- Added two new BMPs
 - ► Rain Garden
 - Regenerative Stormwater Conveyance









LDD Updates



Contact Info

For Design Manual and permitting questions:

▶ GC Land Development Division: 864-467-4610

For IDEAL software installation questions:

▶ Becca Coulter: 803-214-5914

For IDEAL modeling questions:

▶ John Schooler: 757-549-5352