ATTACHMENT 1 TO APPENDIX H

The estimates of nitrogen load reductions resulting from BMP installation are intended for informational purposes only and there is no associated permittee-specific required nitrogen load reduction in the Draft Permit. Nitrogen load reduction estimates calculated consistent with the methodologies below may be used by the permittee to comply with future permit requirements providing the EPA determines the calculated reductions are appropriate for demonstrating compliance with future permit requirements. This attachment provides the method and an example to calculate the BMP nitrogen load as well as methods to calculate nitrogen load reductions for structural BMPs in an impaired watershed.

BMP N Load:

The **BMP N Load** is the annual nitrogen load from the drainage area to each proposed or existing BMP used by permittee. This measure is used to estimate the amount of annual nitrogen load that the BMP will receive or treat (BMP N Load).

To calculate the BMP N Load for a given BMP:

1) Determine the total drainage area to the BMP and sort the total drainage area into two categories: total impervious area (IA) and total pervious area (PA);

2) Calculate the nitrogen load associated with impervious area (N Load $_{IA}$) and the pervious area (N Load $_{PA}$) by multiplying the IA and PA by the appropriate land use-based nitrogen load export rate provided in Table 1; and

3) Determine the total nitrogen load to the BMP by summing the calculated impervious and pervious subarea nitrogen loads.

Table 1: Annual nitrogen load export rates

Nitrogen Source Category by Land Use	Land Surface Cover	Nitrogen Load Export Rate, lbs/ac/yr	Nitrogen Load Export Rate, kg/ha/yr
All Impervious Cover	Impervious	14.1	15.8
*Developed Land Pervious (DevPERV)- HSG A	Pervious	0.3	0.3
*Developed Land Pervious (DevPERV)- HSG B	Pervious	1.2	1.3
*Developed Land Pervious (DevPERV) – HSG C	Pervious	2.4	2.7
*Developed Land Pervious (DevPERV) - HSG C/D	Pervious	3.0	3.4
*Developed Land Pervious (DevPERV) - HSG D	Pervious	3.7	4.1
Notes: For pervious areas, if the hydrologic soil group (HSG) is known, use the appropriate value from this table. If the HSG is not known, assume HSG C/D conditions for the nitrogen load export rate.			

Example 1 to determine nitrogen load to a proposed BMP when the contributing drainage area is 100% impervious: A permittee is proposing a storm water infiltration system that will treat runoff from 1.49 acres of impervious area.

Table 4-2: Design parameters for Bio-filtration w/ ISR systems for Example 1

Components of representation	Parameters	Value
Ponding	Maximum depth	0.33 ft
	Surface area	645 ft^2
Soil mix	Depth	2.0 ft
	Porosity	0.24
	Hydraulic conductivity	2.5 inches/hour
Stone Reservoir (ISR)	Depth	2.50 ft
	Porosity	0.42
	Hydraulic conductivity	500 inches/hour
ISR Volume: System Storage Volume	Ratio	0.56
Orifices	Diameter	12 in
		Installed 2.5 above impermeable soil layer

Determine:

A) Percent nitrogen load reduction (BMP Reduction $_{\%\text{-N}}$) for the specified bio-filtration w/ISR system and contributing impervious drainage area; and

B) Nitrogen reduction in pounds that would be accomplished by the bio-filtration w/ISR system (BMP-Reduction $_{\text{lbs-N}}$)

Solution:

1) The BMP is a bio-filtration w/ISR system that will treat runoff from 1.49 acres of impervious area (IA = 1.49 acre);

2) The available storage volume capacity (ft^3) of the bio-filtration w/ISR system (BMP-Volume $_{\text{BMP-ft}^3}$) is determined using the surface area of the system, depth of ponding, the porosity of the filter media and the porosity of the stone reservoir:

BMP-Volume $_{\text{BMP-ft}^3}$ =Surface area x (pond maximum depth + (soil mix depth x soil mix porosity) + stone reservoir depth x gravel layer porosity))
= 520 ft^2 x (0.33 ft + (2.0ft x 0.24) + (2.5 ft x 0.42))
= 1,200 ft^3

3) The available storage volume capacity of the bio-filtration w/ISR system in inches of runoff from the contributing impervious area (BMP-Volume $_{\text{IA-in}}$) is calculated using equation 1:

BMP-Volume $_{\text{IA-in}}$ = (BMP-Volume $_{\text{ft}^3}$/ IA (acre) x 12 in/ft x 1 acre/43560 ft^2 **(Equation 1)**

Example 1 Continued:

BMP-Volume $_{IA\text{-}in}$ = (1,200 ft^3/1.49 acre) x 12 in/ft x 1 acre/43560 ft^2
= 0.22 in

4) Using the Regional Performance Curve shown in Figure 1 for a bio-filtration w/ ISR system, a **61%** nitrogen load reduction (BMP Reduction %-N) is determined for a bio-filtration w/ ISR systems sized for 0.22 in of runoff from 1.49 acres of impervious area; and

5) Calculate the nitrogen load reduction in pounds of nitrogen for the bio-filtration w/ISR system (BMP Reduction $_{lbs\text{-}N}$) using the BMP Load calculation method shown above in Example 1 and the BMP Reduction $_{\%\text{-}N}$ determined in step 4 by using equation 2.

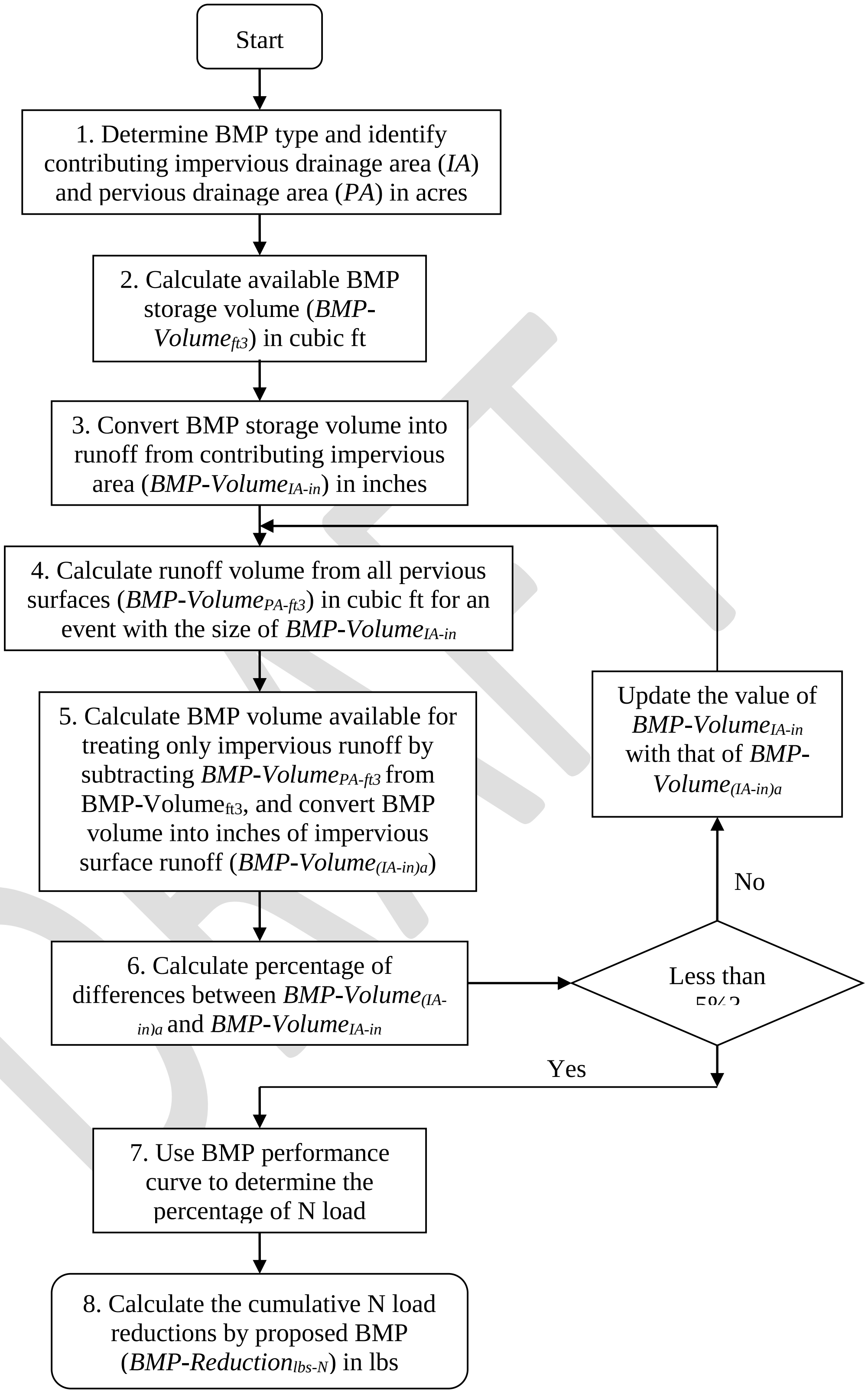
First, the BMP Load is determined as specified in Example 1:

BMP Load = IA (acre) x 14.1 lb/ac/yr
= 1.49 acres x 14.1 lbs/acre/yr
= 21.0 lbs/yr

BMP Reduction $_{lbs\text{-}N}$ = BMP Load x (BMP Reduction $_{\%\text{-}N}$/100) **(Equation 2)**

BMP Reduction $_{lbs\text{-}N}$ = 21 lbs/yr x (61/100)
= **12.8 lbs/yr**

Method to determine the nitrogen load reduction for a structural BMP with a known storage volume when the contributing drainage area has impervious and pervious surfaces


Start
1. Determine BMP type and identify contributing impervious drainage area (*IA*) and pervious drainage area (*PA*) in acres
2. Calculate available BMP storage volume ($BMP\text{-}Volume_{ft3}$) in cubic ft
3. Convert BMP storage volume into runoff from contributing impervious area ($BMP\text{-}Volume_{IA\text{-}in}$) in inches
4. Calculate runoff volume from all pervious surfaces ($BMP\text{-}Volume_{PA\text{-}ft3}$) in cubic ft for an event with the size of $BMP\text{-}Volume_{IA\text{-}in}$
5. Calculate BMP volume available for treating only impervious runoff by subtracting $BMP\text{-}Volume_{PA\text{-}ft3}$ from BMP-Volume_{ft3}, and convert BMP volume into inches of impervious surface runoff ($BMP\text{-}Volume_{(IA\text{-}in)a}$)
6. Calculate percentage of differences between $BMP\text{-}Volume_{(IA\text{-}in)a}$ and $BMP\text{-}Volume_{IA\text{-}in}$
Less than
No
Update the value of $BMP\text{-}Volume_{IA\text{-}in}$ with that of $BMP\text{-}Volume_{(IA\text{-}in)a}$
Yes
7. Use BMP performance curve to determine the percentage of N load
8. Calculate the cumulative N load reductions by proposed BMP ($BMP\text{-}Reduction_{lbs\text{-}N}$) in lbs

Flow Chart 2 (previous page). Method to determine the nitrogen load reduction for a BMP with known storage volume when both pervious and impervious drainage areas are present.

1) Identify the type of structural BMP and characterize the contributing drainage area to the structural BMP by identifying the following information for the impervious and pervious surfaces:

Impervious area (IA) – Area (acre) and export rate (Table 1)

Pervious area (PA) – Area (acre) and runoff depth based on hydrologic soil group (HSG) and size of rainfall event. Table 2 provides values of runoff depth for various rainfall depths and HSGs. Soils are assigned to an HSG based on their permeability. HSG categories for pervious areas in the Watershed shall be estimated by consulting local soil surveys prepared by the National Resource Conservation Service (NRCS) or by a storm water professional evaluating soil testing results from the Watershed. If the HSG condition is not known, a HSG D soil condition should be assumed.

Table 2: Developed Land Pervious Area Runoff Depths based on Precipitation depth and Hydrological Soil Groups (HSGs)

Rainfall Depth, Inches	Runoff Depth, inches		
	Pervious HSG A/B	Pervious HSG C	Pervious HSG D
0.10	0.00	0.00	0.00
0.20	0.00	0.01	0.02
0.40	0.00	0.03	0.06
0.50	0.00	0.05	0.09
0.60	0.01	0.06	0.11
0.80	0.02	0.09	0.16
1.00	0.03	0.12	0.21
1.20	0.04	0.14	0.39
1.50	0.11	0.39	0.72
2.00	0.24	0.69	1.08

Notes: Runoff depths derived from combination of volumetric runoff coefficients from Table 5 of *Small Storm Hydrology and Why it is Important for the Design of Stormwater Control Practices*, Pitt, 1999 and using the Stormwater Management Model (SWMM) in continuous model mode for hourly precipitation data for Boston, MA, 1998-2002.

2) Determine the available storage volume (ft^3) of the structural BMP (BMP-Volume $_{ft^3}$) using the BMP dimensions and design specifications (e.g., maximum storage depth, filter media porosity);

3) To estimate the nitrogen load reduction of a BMP with a known storage volume capacity, it is first necessary to determine the portion of available BMP storage capacity (BMP-Volume $_{ft^3}$) that would treat the runoff volume generated from the contributing impervious area (IA) for a rainfall event with a depth of *i* inches (in). This will require knowing the corresponding amount of runoff volume that would be generated from the contributing pervious area (PA) for the same rainfall event (depth of *i* inches). Using equation 3 below, solve for the BMP capacity that would be available to treat runoff from the contributing imperious area for the unknown rainfall depth of *i* inches (see equation 4):

$\text{BMP-Volume}_{\text{ft}^3} = \text{BMP-Volume}_{(\text{IA-ft}^3)i} + \text{BMP-Volume}_{(\text{PA-ft}^3)i}$ **(Equation 3)**

Where:

$\text{BMP-Volume}_{\text{ft}^3}$	= the available storage volume of the BMP
$\text{BMP-Volume}_{(\text{IA-ft}^3)i}$	= the available storage volume of the BMP that would fully treat runoff generated from the contributing impervious area for a rainfall event of size *i* inches
$\text{BMP-Volume}_{(\text{PA-ft}^3)i}$	= the available storage volume of the BMP that would fully treat runoff generated from the contributing pervious area for a rainfall event of size *i* inches

Solving for $\text{BMP-Volume}_{(\text{IA-ft}^3)i}$:

$\text{BMP-Volume}_{(\text{IA-ft}^3)i} = \text{BMP-Volume}_{\text{ft}^3} - \text{BMP-Volume}_{(\text{PA-ft}^3)i}$ **(Equation 4)**

To determine $\text{BMP-Volume}_{(\text{IA-ft}^3)i}$, requires performing an iterative process of refining estimates of the rainfall depth used to calculate runoff volumes until the rainfall depth used results in the sum of runoff volumes from the contributing IA and PA equaling the available BMP storage capacity ($\text{BMP-Volume}_{\text{ft}^3}$). For the purpose of estimating BMP performance, it will be considered adequate when the IA runoff depth (in) is within 5% IA runoff depth used in the previous iteration.

For the first iteration (1), convert the $\text{BMP-Volume}_{\text{ft}^3}$ determined in step 2 into inches of runoff from the contributing impervious area ($\text{BMP Volume}_{(\text{IA-in})1}$) using equation 5.

$\text{BMP-Volume}_{(\text{IA-in})1} = (\text{BMP-Volume}_{\text{ft}^3} / \text{IA (acre)}) \times (12 \text{ in/ft} / 43{,}560 \text{ ft}^2\text{/acre})$
(Equation 5);

For iterations 2 through n (2…n), convert the $\text{BMP Volume}_{(\text{IA-ft}^3)2\ldots n}$, determined in step 5a below, into inches of runoff from the contributing impervious area ($\text{BMP Volume}_{(\text{IA-in})2\ldots n}$) using equation 6.

$\text{BMP-Volume}_{(\text{IA-in})2\ldots n} = (\text{BMP-Volume}_{(\text{IA-ft}^3)2\ldots n} / \text{IA (acre)}) \times (12 \text{ in/ft} / 43{,}560 \text{ ft}^2\text{/acre})$
(Equation 6);

4) For 1 to n iterations, use the pervious runoff depth information from Table 2 and equation 7 to determine the total volume of runoff (ft^3) from the contributing PA ($\text{BMP Volume}_{\text{PA-ft}^3}$) for a rainfall size equal to the sum of $\text{BMP-Volume}_{(\text{IA-in})1}$, determined in step 3. The runoff volume for each distinct pervious area must be determined.

$\text{BMP Volume}_{(PA\text{-}ft^3)1...n} = \sum((\text{PA} \times (\text{runoff depth})_{(PA1,\ PA2..PAn)} \times (3{,}630\ ft^3/\text{acre-in})$
(Equation 7)

5) For iteration 1, estimate the portion of BMP Volume that is available to treat runoff from only the IA by subtracting BMP-Volume $_{PA\text{-}ft^3}$, determined in step 4, from BMP-Volume $_{ft^3}$, determined in step 2, and convert to inches of runoff from IA (see equations 8 and 9):

$\text{BMP-Volume}_{(IA\text{-}ft^3)2} = ((\text{BMP-Volume}_{ft^3} - \text{BMP Volume}_{(PA\text{-}ft^3)1})$ **(Equation 8)**

$\text{BMP-Volume}_{(IA\text{-}in)2} = (\text{BMP-Volume}_{(IA\text{-}ft^3)2}/\text{IA (acre)}) \times (12\ \text{in/ft} \times 1\ \text{acre}/43{,}560\ ft^2)$
(Equation 9)

If additional iterations (i.e., 2 through n) are needed, estimate the portion of BMP volume that is available to treat runoff from only the IA (BMP-Volume $_{(IA\text{-}in)3..n+1}$) by subtracting BMP Volume $_{(PA\text{-}ft^3)2..n}$, determined in step 4, from BMP Volume $_{(IA\text{-}ft^3)3..n+1}$, determined in step 5, and by converting to inches of runoff from IA using equation 9):

6) For iteration A (an iteration between 1 and n+1), compare BMP Volume $_{(IA\text{-}in)a}$ to BMP Volume $_{(IA\text{-}in)a\text{-}1}$ determined from the previous iteration (a-1). If the difference in these values is greater than 5% of BMP Volume $_{(IA\text{-}in)a}$ then repeat steps 4 and 5, using BMP Volume $_{(IA\text{-}in)a}$ as the new starting value for the next iteration (a+1). If the difference is less than or equal to 5 % of BMP Volume $_{(IA\text{-}in)a}$ then the permittee may proceed to step 7.

7) Determine the % nitrogen load reduction for the structural BMP (BMP Reduction $_{\%\text{-}N}$) using the appropriate BMP curve on Figure 1 or 2 and the BMP-Volume $_{(IA\text{-}in)n}$ calculated in the final iteration of step 5; and

8) Calculate the nitrogen load reduction in pounds of nitrogen for the structural BMP (BMP Reduction $_{lbs\text{-}N}$) using the BMP Load as calculated above in Example 1 and the percent nitrogen load reduction (BMP Reduction $_{\%\text{-}N}$) determined in step 7 by using equation 10:

$\text{BMP Reduction}_{lbs\text{-}N} = \text{BMP Load} \times (\text{BMP Reduction}_{\%\text{-}N}/100)$ **(Equation 10)**

Example 2: Determine the nitrogen load reduction for a structural BMP with a known design volume when the contributing drainage area has impervious and pervious surfaces

A permittee is considering an infiltration basin to capture and treat runoff from a portion of the Watershed draining to the impaired waterbody. The contributing drainage area is 16.55 acres and is 71% impervious. The pervious drainage area (PA) is 80% HSG D and 20% HSG C. An infiltration basin with the following specifications can be placed at the down-gradient end of the contributing drainage area where soil testing results indicates an infiltration rate (IR) of 0.28 in/hr:

Example continued:

Structure	Bottom area (acre)	Top surface area (acre)	Maximum pond depth (ft)	Design storage volume (ft^3)	Infiltration Rate (in/hr)
Infiltration basin	0.65	0.69	1.65	48,155	0.28

Determine the:

A) Percent nitrogen load reduction (BMP Reduction $_{\%\text{-N}}$) for the specified infiltration basin and the contributing impervious and pervious drainage area; and

B) Nitrogen reduction in pounds that would be accomplished by the BMP (BMP-Reduction $_{\text{lbs-N}}$)

Solution:

1) A surface infiltration basin is being considered. Information for the contributing impervious (IA) and pervious (PA) areas are summarized in below.

Impervious area characteristics

ID	% Impervious	Area (acre)
IA1	100	11.75

Pervious area characteristics

ID	Area (acre)	Hydrologic Soil Group (HSG)
PA1	3.84	D
PA2	0.96	C

2) The available storage volume (ft^3) of the infiltration basin (BMP-Volume $_{ft^3}$) is determined from the design details and basin dimensions; BMP-Volume $_{ft^3}$ = 48,155 ft^3.
3) To determine what the BMP design storage volume is in terms of runoff depth (in) from IA, an iterative process is undertaken:

Solution Iteration 1

For the first iteration (1), the BMP-Volume$_{ft^3}$ is converted into inches of runoff from the contributing impervious area (BMP Volume $_{(IA\text{-}in)1}$) using equation 5.

$$\text{BMP Volume}_{(IA\text{-}in)1} = (48{,}155\ ft^2 / 11.75\ acre) \times (12\ in/ft\ / 43{,}560\ ft^2/acre)$$
$$= 1.13\ in$$

Solution Continued:

4-1) The total volume of runoff (ft^3) from the contributing PA (BMP Volume $_{PA\text{-}ft^3}$) for a rainfall size equal to the sum of BMP Volume $_{(IA\text{-}in)1}$ determined in step 3 is determined

for each distinct pervious area using the information from Table 2 and equation 7. Interpolation was used to determine runoff depths.

BMP Volume $_{(PA\text{-}ft^3)1}$ = ((3.84 acre x (0.33 in) + (0.96 acre x (0.13 in)) x 3,630 ft^3/acre-in
= 5052 ft^3

5-1) For iteration 1, the portion of BMP Volume that is available to treat runoff from only the IA is estimated by subtracting the BMP Volume $_{(PA\text{-}ft^3)1}$, determined in step 4-1, from BMP Volume$_{ft^3}$, determined in step 2, and converted to inches of runoff from IA:

BMP Volume $_{(IA\text{-}ft^3)\,2}$ = 48,155 ft^3 – 5052 ft^3
= 43,103 ft^3
BMP Volume $_{(IA\text{-}in)\,2}$ = (43,103 ft^3/11.75 acre) x (12 in/ft x 1 acre/43,560 ft^2)
= 1.01 in

6-1) The % difference between BMP Volume $_{(IA\text{-}in)\,2}$, 1.01 in, and BMP Volume $_{(IA\text{-}in)1}$, 1.13 in is determined and found to be significantly greater than 5%:

% Difference = ((1.13 in – 1.01 in)/1.01 in) x 100
= 12%

Therefore, steps 4 through 6 are repeated starting with BMP Volume $_{(IA\text{-}in)\,2}$ = 1.01 in.

Solution Iteration 2

4-2) BMP-Volume $_{(PA\text{-}ft^3)2}$ = ((3.84 acre x 0.21 in) + (0.96 acre x 0.12 in)) x 3,630 ft^3/acre-in
= 3,358 ft^3

5-2) BMP-Volume $_{(IA\text{-}ft^3)\,3}$ = 48,155 ft^3 – 3,358 ft^3
= 44,797 ft^3

BMP-Volume $_{(IA\text{-}in)\,3}$ = (44,797 ft^3/11.75 acre) x (12 in/ft x 1 acre/43,560 ft^2)
= 1.05 in

6-2) % Difference = ((1.05 in – 1.01 in)/1.05 in) x 100
= 4%

The difference of 4% is acceptable.

Solution Continued:

7) The % nitrogen load reduction for the infiltration basin (BMP Reduction $_{\%-N}$) is determined by using the RR treatment curve in Figure 2 and the treatment volume (BMP-Volume $_{Net\ IA-in}$ = 1.05 in) calculated in step 5-2 and is **BMP Reduction $_{\%-N}$ = 56%**.

9) The nitrogen load reduction in pounds of nitrogen (BMP-Reduction $_{lbs-N}$) for the proposed infiltration basin is calculated by using equation 11 with the BMP Load (as determined by the procedure in Example 4-1) and the N $_{target}$ of 56%.

BMP-Reduction $_{lbs-N}$ = BMP N Load x (N $_{target}$ /100) **(Equation 11)**

Following example 1, the BMP load is calculated:

BMP N Load = (IA x impervious cover nitrogen export loading rate)
+ (PA$_{HSG\ D}$ x pervious cover nitrogen export loading rate, HSG D
+ (PA$_{HSG\ C}$ x pervious cover nitrogen export loading rate, HSG C)
= (16.55 acre x 15.4 lbs/acre/yr) + (3.84 acre x 3.7 lbs/acre/yr) + (0.96 acre x 2.4 lbs/acre/yr)
= 271.4 lbs/yr

BMP-Reduction $_{lbs-N}$ = 275.13 lbs/yr x 56/100 = **152.0 lbs/yr**

Figure 1: Regional BMP Performance Curve for Annual Nitrogen Load Removal: System Design by the University of New Hampshire Stormwater Center (UNHSWC)

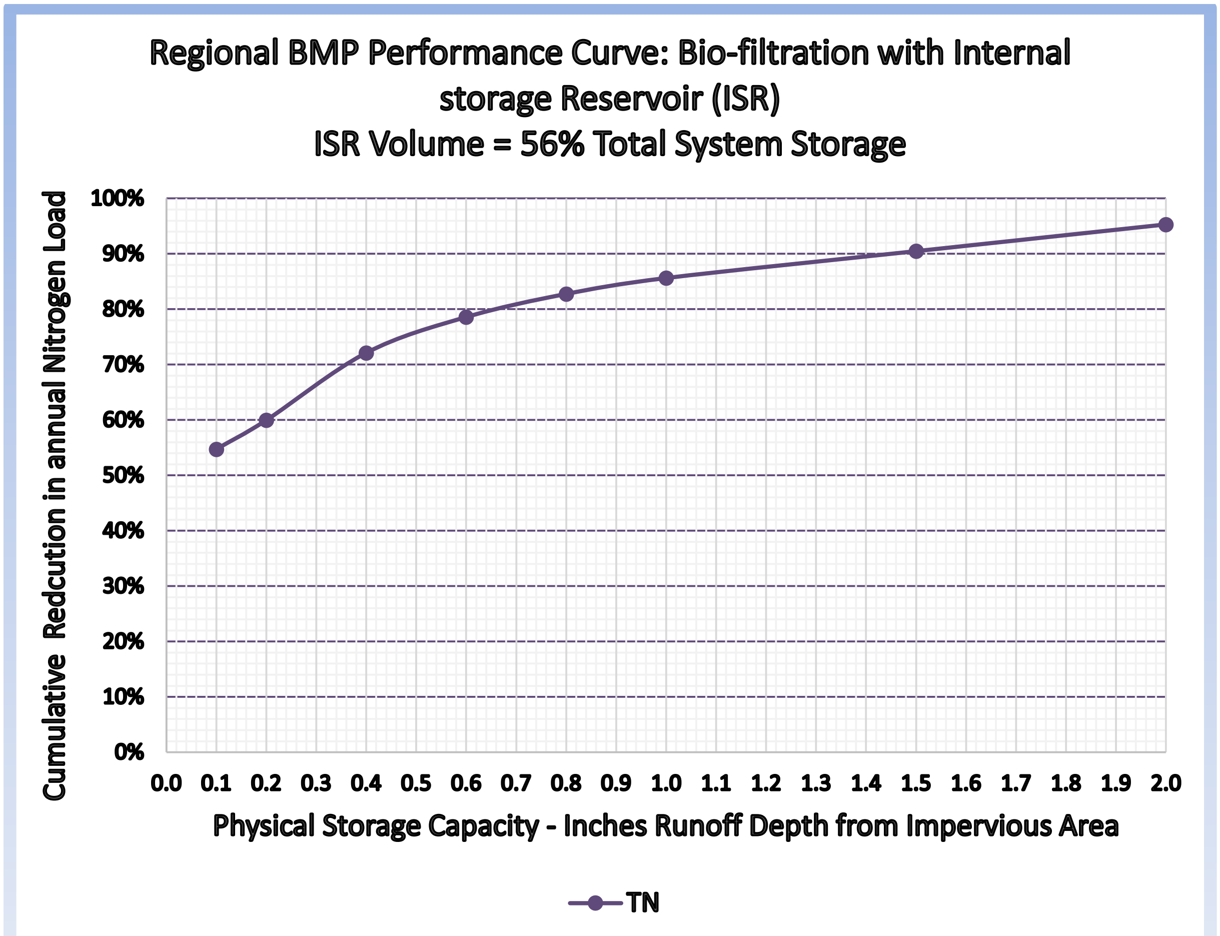
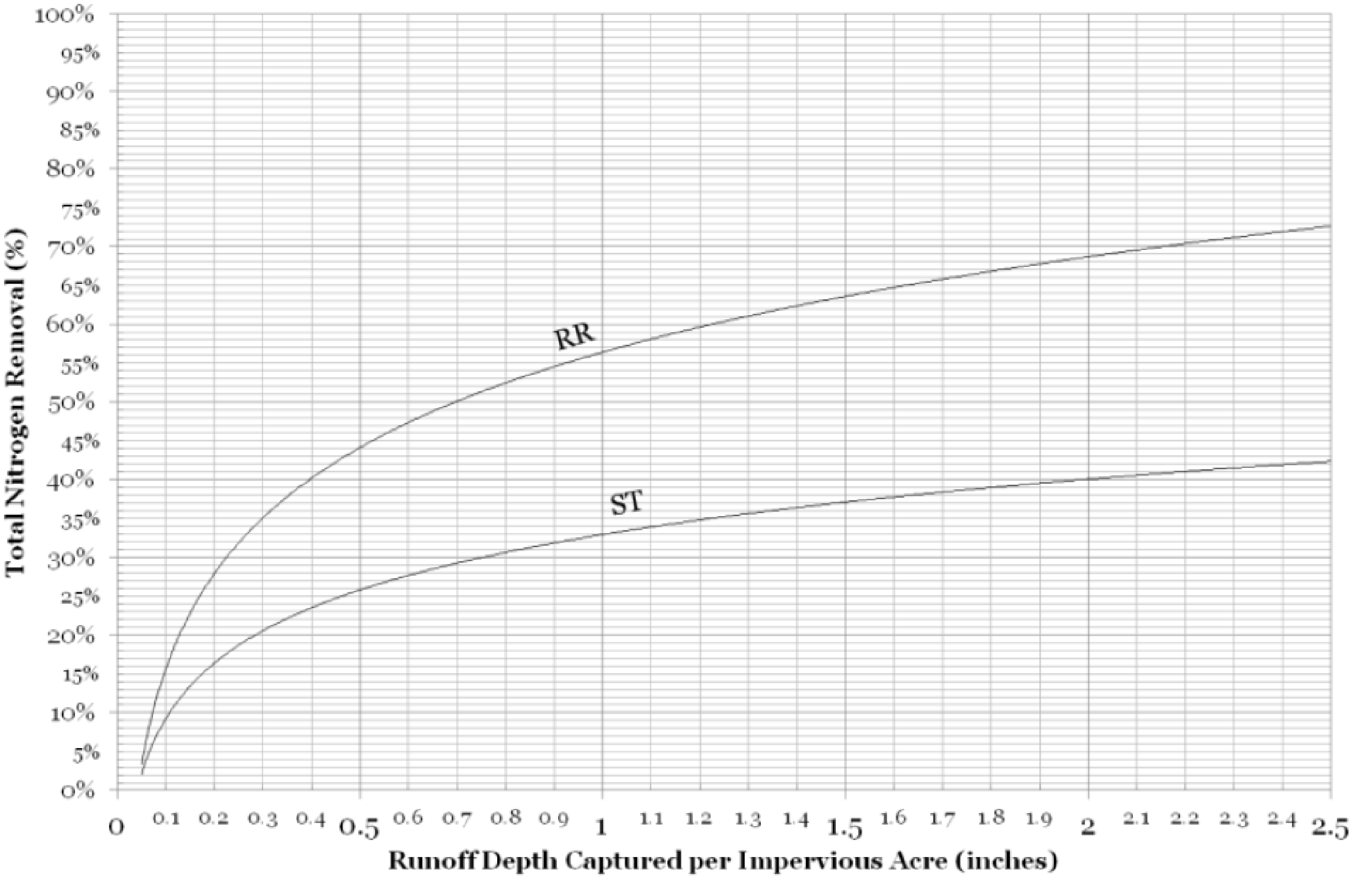


Figure 2: Total Nitrogen Removal for RR and ST Practices



Adopted from: Final CBP Approved Expert Panel Report on Stormwater Retrofits
http://chesapeakestormwater.net/wp-content/plugins/download-monitor/download.php?id=25, Retrieved 12/14/2012