

Appendix V: Protocols for Verification of Annual BMP Data Submissions

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Who performs the annual evaluation?

Appendix V

Protocols for Verification of Annual BMP Data Submissions

– The Need for BMP Verification & Assessment

Under the Chesapeake Bay Program (CBP) partnership, the annual Best Management Practice (BMP) data submitted by the seven Bay jurisdictions for the model progress assessment is an assessment of the quality of the BMP data. This assessment of the quality of the BMP data follows the CBP procedures as described in the 2014 document entitled, [Strength of BMPs Implemented in the Chesapeake Bay Watershed: A Basic Verification framework document](#)). The data being reviewed by EPA staff at the Chesapeake Bay Program Office (CBPO), include **jurisdictions through NEIEN (National Environmental Information System) wastewater facility data submitted through the CBPO wastewater**

- EPA with assistance from Chesapeake Bay Program Staff

Which analyses are included in the annual evaluation?

Analysis of:

- 1) **Modeled Load Changes by major source** (Agriculture, Developed, Natural, Wastewater, Septic) – The change in loads from 2009 to present.
- 2) **Newly Reported BMPs** – BMPs reported for the first time in the 30+ year historic BMP record.
- 3) **Reported BMP Implementation Rate Changes** - Over and Under reporting of BMPs using the CAST BMP Summary Report
- 4) **Implementation and Inspection Dates** for Reported BMPs in NEIEN

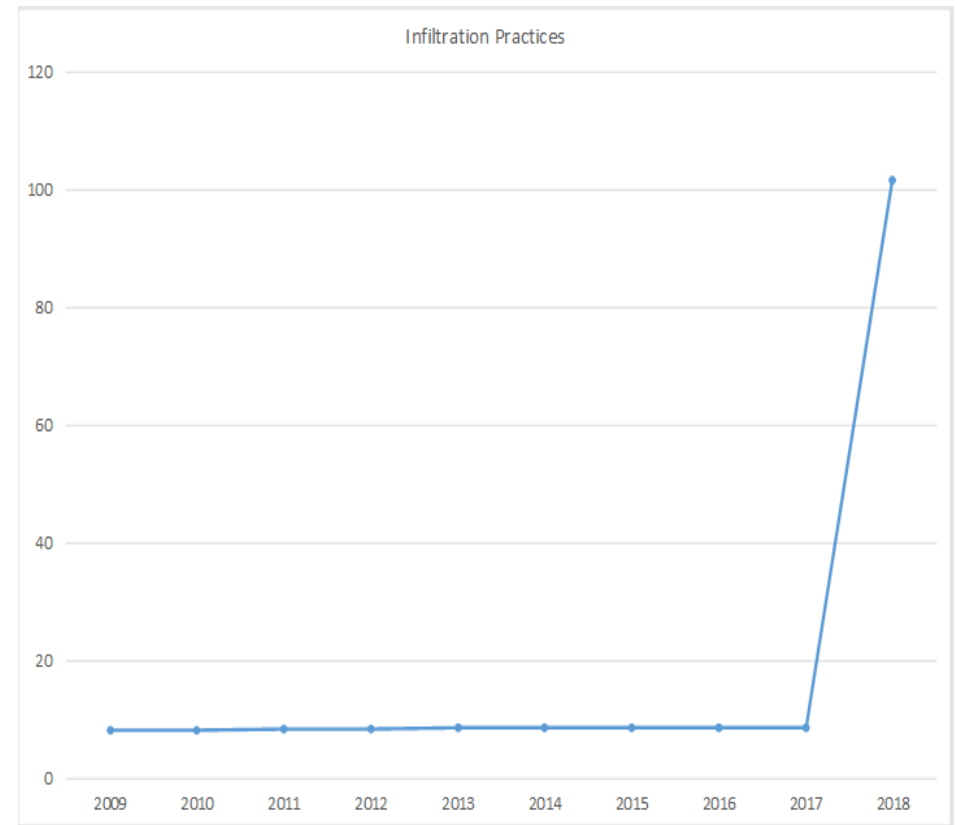
How are the analyses conducted?

Two verification assessments to accommodate changes in reported historic BMP Implementation:

- 1) **First Assessment** = published (official) versions of previous years' progress scenarios
- 2) **Second Assessment** = re-run versions of previous years' progress scenarios that accommodate changes in reported historic BMP Implementation submitted with the current progress scenario

How are “significant” changes defined?

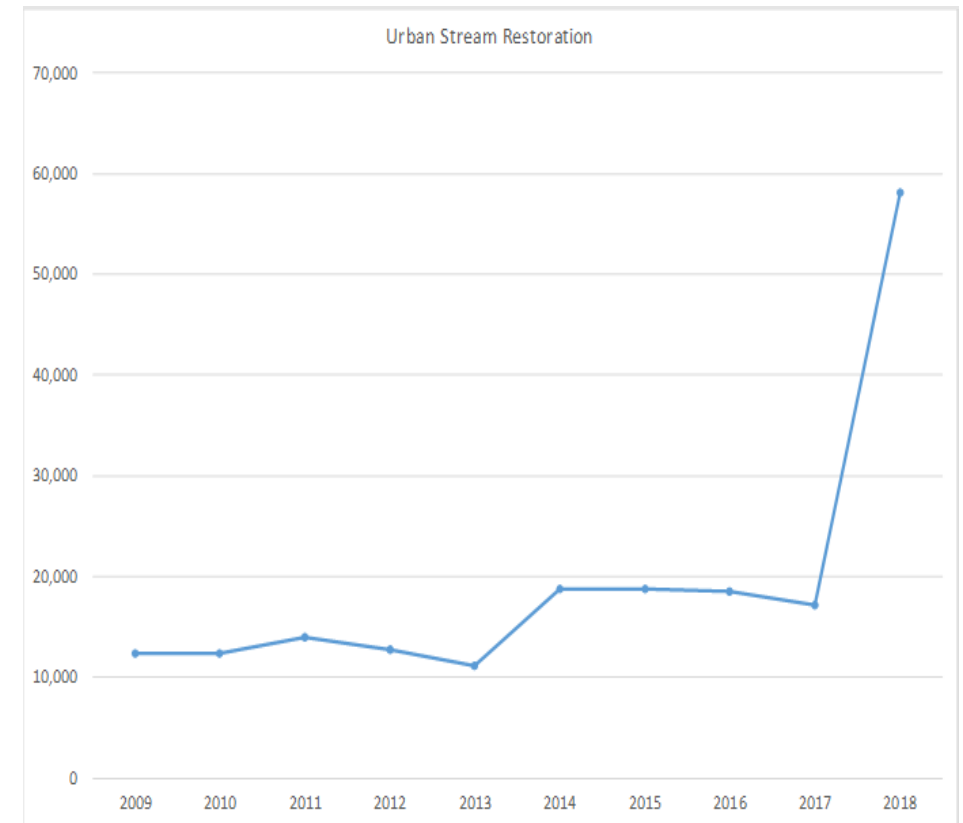
- 1) **For Load Changes by major source:** an **annual change greater than 2%** comparing the annual change between the most recent years (e.g., 2019-2020 for 2020 Progress) to the annual rate from 2009-present (2009-2020 for 2020 Progress).
- 2) **For Newly Reported BMPs:** A significant change is the appearance of a BMP that does not have a long historical record.



How are “significant” changes defined?

3) For Reported BMP Rate Changes: Annual rate of implementation is more than double the rate of implementation since 2009 (the starting point of the Bay TMDL).

4) For Implementation and Inspection Dates: 500+ instances of a particular date across several BMPs, a significant degree of implementation



“Rate of BMP Implementation” Meaning

- Implementation is the **execution of a plan**.
 - The reported data needs to represent how on-the-ground management actions (that would yield lower loads to the nearest water body) changed through time – the rate from year to year.
- For Appendix V, Rate of BMP Implementation is **not isolated to new implementation**.
- Rate of implementation accounts for the **gains and losses in executing each state’s watershed implementation plan**.
 - The ground gained by new implementation of practices may be lost by, for example, *a decline in practices due to practices not being inspected or a loss of practices due to new development*.

QAPPs should include:

- Program sources of BMP data, detailed explanations of methods of tracking, reporting and verifying for each BMP including calculations performed between receipt of raw data and the data reported through NEIEN. Information on compliance programs, etc.
- Answer why the BMPs have not been previously reported – Ex. New implementation or a new source of data?

[More information found in Appendix Q.](#)



Questions?