## **Technical Memorandum**

### Point Sources of Sediment in the Non-Tidal Piscataway Creek Watershed

The U.S. Environmental Protection Agency (USEPA) requires that Total Maximum Daily Load (TMDL) allocations account for all sources of each impairing pollutant (CFR 2012). This technical memorandum identifies the point sources of sediment in the Maryland 8-Digit (MD 02140203) Piscataway Creek watershed. Wasteload allocations (WLA) are provided for National Pollutant Discharge Elimination System (NPDES) permitted wastewater and stormwater point sources. The State reserves the right to allocate the TMDLs among different sources in any manner that is reasonably calculated to protect aquatic life from sediment related impacts.

The wastewater category includes those loads generated by continuous discharge sources whose permits have total suspended solids (TSS) limits (i.e., contributors to the watershed sediment load). Wastewater permits that do not meet these conditions are considered *de minimis* in terms of the total watershed sediment load. There is one wastewater facility within the Piscataway Creek watershed that has TSS limits in its permit. The WLA for the wastewater permit is calculated based on its TSS limit and corresponding flow information (See Sections 2.2.2 and 4.6 of the main report for further details). Sediment loads from the Piscataway wastewater treatment plant (WWTP) are not included in this analysis because it discharges into the tidal portion of the watershed, which is not included in this TMDL. Sediment loads from this facility were addressed in the 2010 Chesapeake Bay TMDL for sediment in the POTTF\_MD segment.

Stormwater permits are regulated based on Best Management Practices (BMPs) and do not include TSS limits. In the absence of TSS limits, the baseline loads for these NPDES regulated stormwater discharges are calculated using the nonpoint source loads from the urban land use within the watershed. The associated WLAs are calculated by applying reductions to the urban land use loads. These calculations are described in more detail below. The stormwater category in the Piscataway Creek watershed includes Phase I and Phase II MS4 permits as well as Other NPDES Regulated Stormwater. Other NPDES Regulated Stormwater permits include general stormwater discharges from industrial facilities and construction sites. All permits included in the WLA calculations are listed in Table 1.

Stormwater WLAs are estimated using a watershed model. The watershed model chosen for the non-tidal Piscataway Creek Sediment TMDL was the Chesapeake Bay Program Phase 5.3.2 (CBP P5.3.2) watershed model 2009 Progress Scenario *edge-of-stream* (EOS) sediment loads. Within this TMDL, the NPDES regulated stormwater baseline sediment loads are represented by the urban land-use EOS loads associated with the NPDES stormwater permits within the watershed. Urban land-use EOS loads are calculated within the CBP P5.3.2 watershed model as a product of the land use area, land use target *edge-of-field* (EOF) loading rate, and loss from the EOF to the main channel (i.e., sediment delivery factor). BMP data and reduction efficiencies are then subsequently applied to calculate the final EOS loads (USEPA 2010b). Further details

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regarding general nonpoint source sediment load calculations can be found in Section 2.2.1 of the main report.

In order to calculate the NPDES stormwater WLA, MDE further refined the CBP P5.3.2 urban land-use. For any given watershed, the refined CBP P5.3.2 land-use contains the specific level of detail needed to determine individual WLAs for Phase I jurisdictional MS4s, the State Highway Administration (SHA) Phase I MS4, and Phase II jurisdictional MS4s, and an aggregate WLA for "Other NPDES Regulated Stormwater" entities. The methods used by MDE to refine the CBP P5.3.2 urban land-use are described within MDE's documentation, *CBP P5.3.2 Land-Use and MDE Urban Source Sector Delineation - Development Methodology* (MDE 2011).

Table 1 identifies the individual wastewater facilities that contribute to the watershed sediment load and provides the baseline load and allocation assigned to these facilities. Table 2 identifies all of the applicable NPDES stormwater permits in the Piscataway Creek watershed. Table 3 provides the distribution of the NPDES Regulated Stormwater WLA in the Piscataway Creek watershed amongst the permits identified in Table 2.

Table 1: Piscataway	<b>Creek Sediment TMDL</b>	Wastewater Point Source WLAs

			<b>Baseline Load</b>	WLA	Reduction	MDL
Facility Name	NPDES #	Permit Type	(ton/yr)	(ton/yr)	(%)	ton/day
Cheltenham Boy's Village						
WWTP & WTP	MD0023931	Municipal	4	4	0	0.03

NPDES Permit #	Facility Name	NPDES Regulated Stormwater WLA Sector
	Prince George's County	County Phase I MS4
MD0068276	State Highway Administration	SHA Phase I MS4
MDR055501	State and Federal Phase II MS4	State and Federal Phase II MS4
MDR003062	ABC Distribution LLC	Other NPDES Regulated Stormwater
MDR000981	O & A Used Auto Parts	Other NPDES Regulated Stormwater
MDR000161	Potomac Airfield	Other NPDES Regulated Stormwater
MDR001740	WSSC - Temple Hills Garage	Other NPDES Regulated Stormwater
MDRC	MDE General Permit to Construct	Other NPDES Regulated Stormwater

NPDES Regulated Stormwater Sector	NPDES #	Baseline Load (ton/yr)	WLA (ton/year)	Reduction (%)	<b>MDL</b> (ton/day)
County Phase I MS4	MDR055500	1,085	535	51	4.6
State Highway Administration	MD0068276	74	36	51	0.3
State and Federal Phase II MS4	MDR055501	253	124	51	1.1
"Other NPDES Regulated Stormwater"	N/A	1,370	1,175	14	10
TOTAL		2,782	1,870	33	16

# Table 3: Piscataway Creek Sediment TMDL Allocations for NPDES Regulated Stormwater WLAs

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