

PUBLIC REVIEW DRAFT

**Total Maximum Daily Load of Sediment
in the Lower Gunpowder Falls Watershed,
Baltimore County, Maryland**

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PUBLIC REVIEW DRAFT

Table of Contents

List of Figures i
List of Tables i
List of Abbreviations ii
EXECUTIVE SUMMARY iv
1.0 INTRODUCTION 1
2.0 SETTING AND WATER QUALITY DESCRIPTION 4
 2.1 General Setting 4
 2.1.1 Land-use 7
 2.2 Source Assessment 10
 2.2.1 Nonpoint Source Assessment 10
 2.2.2 Point Source Assessment 12
 2.2.4 Summary of Baseline Loads 13
 2.3 Water Quality Characterization 15
 2.4 Water Quality Impairment 18
3.0 TARGETED WATER QUALITY GOAL 20
4.0 TOTAL MAXIMUM DAILY LOADS AND SOURCE ALLOCATION 21
 4.1 Overview 21
 4.2 Analysis Framework 21
 4.3 Scenario Descriptions and Results 23
 4.4 Critical Condition and Seasonality 24
 4.5 TMDL Loading Caps 25
 4.6 Load Allocations Between Point and Nonpoint Sources 26
 4.7 Margin of Safety 29
 4.8 Summary of Total Maximum Daily Loads 29
5.0 ASSURANCE OF IMPLEMENTATION 31
REFERENCES 35
APPENDIX A – Watershed Characterization Data A1
APPENDIX B – Technical Approach Used to Generate Maximum Daily Loads B1

PUBLIC REVIEW DRAFT

List of Figures

Figure 1: Designated Use Classes of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland 3
Figure 2: Location Map of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland 6
Figure 3: Land-use of the Lower Gunpowder Falls Watershed..... 9
Figure 4: Monitoring Stations in the Lower Gunpowder Falls Watershed..... 17
Figure B-1: Daily Time Series of CBP River Segment Daily Simulation Results for the Lower Gunpowder Falls WatershedB5

List of Tables

Table ES-1: Lower Gunpowder Falls Integrated Report Impairment Listings..... v
Table ES-2: Lower Gunpowder Falls Baseline Sediment Loads (ton/yr) viii
Table ES-3: Lower Gunpowder Falls Average Annual TMDL of Sediment/TSS (ton/yr) viii
Table ES-4: Lower Gunpowder Falls Baseline Load, TMDL, and Total Reduction Percentage viii
Table 1: Lower Gunpowder Falls Integrated Report Impairment Listings..... 2
Table 2: Land-use Percentage Distribution for the Lower Gunpowder Falls Watershed... 8
Table 3: Target EOF Loading rates (ton/ac/yr) By Land-use 11
Table 4: Lower Gunpowder Falls Baseline Sediment Loads (ton/yr) 13
Table 5: Detailed Baseline Sediment Budget Loads Within the Lower Gunpowder Falls Watershed 14
Table 6: Monitoring Stations in the Lower Gunpowder Falls Watershed 16
Table 7: Lower Gunpowder Falls Watershed CORE/TREND Data 19
Table 8: Lower Gunpowder Falls Baseline Load and TMDL 26
Table 9: Lower Gunpowder Falls TMDL Reductions by Source Category 27
Table 10: Lower Gunpowder Falls Watershed Average Annual TMDL of Sediment/TSS (ton/yr) 29
Table 11: Lower Gunpowder Falls Maximum Daily Load of Sediment/TSS (ton/day) .. 30
Table A-1: Reference Watersheds A1
Table B-1: Lower Gunpowder Falls Maximum Daily Loads of Sediment/TSS (ton/day)B6

PUBLIC REVIEW DRAFT

List of Abbreviations

AFO	Animal Feeding Operations
BIBI	Benthic Index of Biotic Integrity
BIP	Buffer Incentive Program
BMP	Best Management Practices
BSID	Biological Stressor Identification
CAFOs	Concentrated Animal Feeding Operations
CBLCD	Chesapeake Bay Land-Cover Dataset
CBP	Chesapeake Bay Program
CBP P4.3	Chesapeake Bay Program Model Phase 4.3
CBP P5.3.2	Chesapeake Bay Program Model Phase 5.3.2
CCAP	Coastal Change Analysis Program
cfs	Cubic Feet per Second
COMAR	Code of Maryland Regulations
CV	Coefficient of Variation
CWA	Clean Water Act
DI	Diversity Index
EOF	Edge-of-Field
EOS	Edge-of-Stream
EPT	<i>Ephemeroptera, Plecoptera, and Trichoptera</i>
ESD	Environmental Site Design
FIBI	Fish Index of Biologic Integrity
GIS	Geographic Information System
GUNOH	Gunpowder River Oligohaline
HBI	Hilsenhoff Biotic Index
HSPF	Hydrological Simulation Program Fortran
IBI	Index of Biotic Integrity
LA	Load Allocation
m	Meter
m ³ /yr	Meters cubed per year
MACS	Maryland Agricultural Water Quality Cost-Share Program
MAL	Minimum Allowable IBI Limit
MBSS	Maryland Biological Stream Survey
MDDNR	Maryland Department of Natural Resources
MDE	Maryland Department of the Environment
MDL	Maximum Daily Load
MDP	Maryland Department of Planning
MGD	Millions of Gallons per Day
mg/l	Milligrams per liter
MGS	Maryland Geological Survey
MOS	Margin of Safety
MRLC	Multi-Resolution Land Characteristics

PUBLIC REVIEW DRAFT

MS4	Municipal Separate Storm Sewer System
NLCD	National Land-Cover Dataset
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRI	Natural Resources Inventory
PSU	Primary Sampling Unit
SCS	Soil Conservation Service
SDF	Sediment Delivery Factor
SHA	State Highway Administration
TMDL	Total Maximum Daily Load
ton/acre/yr	Tons per acre per year
ton/day	Tons per day
ton/yr	Tons per year
TSD	Technical Support Document
TSS	Total Suspended Solids
USDA	United States Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USGS	United States Geological Survey
WIP	Watershed Implementation Plan
WLA	Waste Load Allocation
WQA	Water Quality Analysis
WQLS	Water Quality Limited Segment

PUBLIC REVIEW DRAFT

EXECUTIVE SUMMARY

Section 303(d) of the federal Clean Water Act (CWA) and the USEPA's implementing regulations direct each state to identify and list waters, known as water quality limited segments (WQLSs), in which current required controls of a specified substance are inadequate to achieve water quality standards. For each WQLS, the State is required to either establish a TMDL of the specified substance that the waterbody can receive without violating water quality standards, or demonstrate that water quality standards are being met (CFR 2012b). This document, upon approval by the U.S. Environmental Protection Agency (USEPA), establishes a Total Maximum Daily Load (TMDL) for sediment/total suspended solids (TSS) in the non-tidal Maryland 8-Digit Lower Gunpowder Falls watershed (2012 *Integrated Report of Surface Water Quality in Maryland* Assessment Unit ID: MD-02130802). In this TMDL, the terms TSS and sediment may be used interchangeably.

The Lower Gunpowder Falls contains both non-tidal and tidal waters. The non-tidal waters are associated with the 8-digit watershed Lower Gunpowder Falls (02130802). The tidal waters are associated with the Chesapeake Bay segment Gunpowder River Oligohaline (GUNOH). The Maryland Department of the Environment (MDE) identified both segments of the Lower Gunpowder Falls watershed on the State's 2014 Integrated Report as impaired by multiple pollutants (MDE 2014). Table ES-1 identifies Integrated Report listings associated with this watershed (MDE 2014). A data solicitation for TSS/sediment was conducted by MDE in December 2014, and all readily available data have been considered.

PUBLIC REVIEW DRAFT

Table ES-1: Lower Gunpowder Falls Integrated Report Listings

Watershed	Basin Code	Tidal/Non-tidal	Designated Use Class	Year Listed	Identified Pollutant	Listing Category
Lower Gunpowder Falls	02130802	Non-tidal	I - Aquatic Life and Wildlife	1996	Phosphorus (Total)	2
				2012	TSS	5
					Chlorides	5
					Sulfates	5
					Channelization	4c
				-	Zinc	2
					Arsenic	2
					Selenium	2
					Lead	2
					Nickel	2
					Mercury	2
					Chromium, hexavalent	2
				Cadmium	2	
Gunpowder River Oligohaline	GUNOH	Tidal	II - Seasonal Migratory Fish Spawning and Nursery Subcategory	2012	TN	4a
					TP	4a
			Open Water Fish and Shellfish	1996	TN	4a
					TP	4a
			Seasonal Shallow Water – Submerged Aquatic Vegetation	2010	TSS	4a
			Tidal subsegment	2006	PCB	5

Footnote:

- Category 2 indicates the waterbody is meeting water quality standards for the identified substance
- Category 3 indicates insufficient data to make a listing category determination
- Category 4a indicates a TMSL has been completed and approved by EPA
- Category 4c indicates the cause of the impairment is pollution and not a pollutant
- Category 5 indicates that the waterbody is impaired and a TMDL or water quality analysis (WQA) is needed.

The Maryland Surface Water Use Designation in the Code of Maryland Regulations (COMAR) for Lower Gunpowder Falls non-tidal mainstem (U. S. Route 95 upstream to Cromwell Bridge Road) is designated as Use Class IV (Recreational Trout Waters). Most tributaries to the mainstem, including Minebank Run and Jennifer Branch are Use Class I (Water Contact Recreation and Protection of Aquatic Life). Pierce Branch, Cowen Run, Haystack Branch, Sweathouse Branch, Long Green Creek, and their respective tributaries are designated as Use Class III (Nontidal Coldwater Aquatic Life). (COMAR 2015a,b,c).

PUBLIC REVIEW DRAFT

The mainstem Gunpowder Falls, east of Philadelphia Rd, is designated as Use Class II (Support of Estuarine and Marine Aquatic Life and Shellfish Harvesting).

The Lower Gunpowder Falls watershed was originally listed for biological impairment on the 2002 Integrated Report. The listing was based on the biological assessment methodology, which uses aquatic health scores, consisting of the Benthic Index of Biotic Integrity (BIBI) and Fish Index of Biotic Integrity (FIBI). These indices indicated that the biological metrics for the watershed exhibit a significant negative deviation from reference conditions (MDE 2002a).

In order to determine what stressor or stressors are impacting aquatic life, MDE's *Biological Stressor Identification* (BSID) methodology was applied. The Biological Stressor Identification (BSID) analysis for the Lower Gunpowder Falls watershed identified TSS/sediment/instream habitat, inorganic pollutants (i.e. chlorides, sulfates), and anthropogenic channelization as a potential stressors. TSS/sediment shows a significant association with degraded biological conditions; as much as 61% of the biologically impacted stream miles in the watershed may be degraded due extensive bar formation present, channel alteration, and marginal to poor epifaunal substrate. The instream habitat stressor group – which includes channelization present, marginal to poor instream habitat, marginal to poor riffle/run quality, and concrete/gabion present – may affect up to 70% of the biologically impacted stream miles in the watershed. Specifically, anthropogenic sources have resulted in altered habitat heterogeneity and possible elevated suspended sediment in the watershed, which are in turn the probable causes of impacts to biological communities. Further details of this analysis are presented in the 2012 document entitled, '*Watershed Report for Biological Impairment of the Non-Tidal Lower Gunpowder Falls Watershed in Baltimore County, Maryland Biological Stressor Identification Analysis Results and Interpretation*'.

As a result of the BSID analysis, the non-tidal MD 8-digit Lower Gunpowder Falls watershed will be listed as impaired by TSS and requiring a TMDL. The objective of this TMDL is to ensure that watershed sediment loads are at a level that supports the Use Class I/III/IV designations for the Lower Gunpowder Falls watershed. The TMDL will address water clarity problems and associated impacts to aquatic life in Lower Gunpowder Falls caused by high sediment and TSS concentrations.

Currently in Maryland, there are no specific numeric criteria that quantify the impact of sediment on the aquatic life of non-tidal stream systems. In order to quantify the impact of sediment on the aquatic life of non-tidal stream systems, a reference watershed TMDL approach was used, which resulted in the establishment of a *sediment loading threshold* (Currey *et al.* 2006). This threshold is based on a detailed analysis of sediment loads from watersheds that are identified as supporting aquatic life (i.e., reference watersheds) based on Maryland's biocriteria (Roth *et al.* 1998, 2000; Stribling *et al.* 1998; MDE 2008). This threshold is then used to determine a watershed specific sediment TMDL endpoint. The resulting loads are considered the maximum allowable loads the waterbody can receive without causing any sediment related impacts to aquatic health.

PUBLIC REVIEW DRAFT

In order to use a reference watershed approach, sediment loads are estimated using a watershed model. For this analysis, the Chesapeake Bay Program Phase 5.3.2 (CBP P5.3.2) watershed model was chosen and specifically, the *edge-of-stream* (EOS) land-use sediment loads were used. The CBP P5.3.2 model was chosen because the spatial domain of the model segmentation aggregates to the MD 8-digit watersheds, which is closely consistent with the impairment listing.

USEPA's regulations require TMDLs to take into account seasonality and critical conditions for stream flow, loading, and water quality parameters (CFR 2012b). The intent of this requirement is to ensure that the water quality of the waterbody is protected during times when it is most vulnerable. The biological monitoring data used to determine the reference watersheds reflect the impacts of stressors (i.e., sediment impacts to stream biota) over the course of time (i.e., captures the impacts of both high and low flow events). Thus, critical conditions are inherently addressed. Seasonality is captured in several components. First, it is implicitly included in biological sampling as biological communities reflect the impacts of stressors over time, as described above. Second, the Maryland Biological Stream Survey (MBSS) dataset, which serves as the primary dataset for calculating the biological metrics of the watershed (i.e., BIBI and FIBI scores), included benthic sampling in the spring and fish sampling in the summer. Moreover, the sediment loading rates used in the TMDL were determined using the CBP P5.3.2 model which is based on Hydrological Simulation Program Fortran (HSPF) model, which is a continuous simulation model with a simulation period 1991-2000, thereby addressing annual changes in hydrology and capturing wet, average, and dry years.

All TMDLs need to be presented as a sum of waste load allocations (WLAs) for point sources and load allocations (LAs) for nonpoint sources generated within the assessment unit, accounting for natural background, tributary and adjacent segment loads. Furthermore, all TMDLs must include a margin of safety (MOS) to account for any lack of knowledge and uncertainty concerning the relationship between loads and water quality (CFR 2012a,b). It is proposed that the estimated variability around the reference watershed group used in this analysis already accounts for such uncertainty, and therefore the MOS is implicitly included. Because the sediment loading threshold was conservatively based on the median sediment loading rates from reference watersheds, Maryland has adopted an implicit MOS for sediment TMDLs.

The Lower Gunpowder Falls watershed total baseline sediment load is 6,916 tons per year (ton/yr). The Lower Gunpowder Falls Watershed baseline load contribution is further subdivided into a nonpoint source baseline load (Nonpoint Source BL_{LGF}) and two types of point source baseline loads: National Pollutant Discharge Elimination System (NPDES) regulated stormwater (NPDES Stormwater BL_{LGF}) and regulated process water (Process Water BL_{LGF}) (see Table ES-2).

Table ES-2: Lower Gunpowder Falls Baseline Sediment Loads (ton/yr)

Total Baseline Load (ton/yr)	=	Nonpoint Source BL_{LGF}	+	NPDES Stormwater BL_{LGF}	+	Process Water BL_{LGF}
6,916	=	2,589	+	4,319	+	8

The Lower Gunpowder Falls average annual TMDL of sediment/ TSS is 3,696 ton/yr (a 46% reduction from the baseline load). The Lower Gunpowder Falls TMDL contribution is further subdivided into point and nonpoint source allocations and is comprised of a load allocation (LA_{LGF}) of 1,832 ton/yr, an NPDES Stormwater Waste Load Allocation (NPDES Stormwater WLA_{LGF}) of 1,856 ton/yr, and a Process Water Waste Load Allocation (Process Water WLA_{LGF}) of 8 ton/yr (see Table ES-2).

Table ES-3: Lower Gunpowder Falls Average Annual TMDL of Sediment/TSS (ton/yr)

TMDL (ton/yr)	=	LA_{LGF}	+	NPDES Stormwater WLA_{LGF}	+	Process Water WLA_{LGF}	+	MOS
3,696	=	1,832	+	1,856	+	8	+	Implicit

Table ES-4: Lower Gunpowder Falls Baseline Load, TMDL, and Total Reduction Percentage

Baseline Load (ton/yr)	TMDL (ton/yr)	Total Reduction (%)
6,916	3,696	46

In addition to the TMDL value, a Maximum Daily Load (MDL) is also presented in this document. The calculation of the MDL, which is derived from the TMDL average annual loads, is explained in Appendix B and presented in Table B-1.

This TMDL will ensure that watershed sediment loads are at a level to support the Use Class I/III/IV designations for the Lower Gunpowder Falls watershed, and more specifically, at a level to support aquatic life. The TMDL, however, will not completely resolve the impairment to biological communities within the watershed. Since the BSID watershed analysis identifies other possible stressors impacting the biological conditions (e.g. chlorides, sulfates, channelization), additional TMDL or TMDLs may be needed to address the impacts to biological communities. This impairment to aquatic life will only be fully addressed when all impairing substances identified as impacting biological communities in the watershed are reduced to levels that will meet water quality standards, as established in future TMDLs for those substances (MDE 2009, 2012a).

PUBLIC REVIEW DRAFT

Section 303(d) of the CWA and current USEPA regulations require reasonable assurance that the TMDL can and will be implemented. Once the USEPA has approved this TMDL and it is known what measures must be taken to reduce pollution levels, implementation of best management practices (BMPs) is expected to take place. The Lower Gunpowder Falls Sediment TMDL is expected to be implemented as part of a staged process. This staged process is designed to achieve both the sediment reductions needed within the Lower Gunpowder Falls watershed and to meet sediment target loads consistent with the Chesapeake Bay TMDLs, established by USEPA in 2010 (USEPA 2010a) and scheduled for full implementation by 2025. The Bay TMDLs require reductions of nitrogen, phosphorus, and sediment loads throughout the Bay watershed to meet water quality standards that protect the designated uses in the Bay and its tidal tributaries.

MDE expects that the first stage of implementation of the Lower Gunpowder Falls Sediment TMDL will focus on achieving the sediment reductions required within the watershed as per the Chesapeake Bay TMDL, which is expected to be fully implemented in Maryland by 2025, to meet downstream water quality standards in the GUNOH and the mainstem Chesapeake Bay. Once the Bay TMDL target sediment loads for the Lower Gunpowder Falls watershed have been met, MDE will reassess the sediment impacts on aquatic life in the Lower Gunpowder Falls watershed, based on any additional monitoring data available. MDE intends for the required reductions to be implemented in an iterative process that first addresses those sources with the largest impact to water quality, with consideration given to cost of implementation.

PUBLIC REVIEW DRAFT

1.0 INTRODUCTION

Section 303(d) of the federal Clean Water Act (CWA) and the USEPA's implementing regulations direct each state to identify and list waters, known as water quality limited segments (WQLSs), in which current required controls of a specified substance are inadequate to achieve water quality standards. For each WQLS, the State is required to either establish a TMDL of the specified substance that the waterbody can receive without violating water quality standards, or demonstrate that water quality standards are being met (CFR 2012b). This document, upon approval by the U.S. Environmental Protection Agency (USEPA), establishes a Total Maximum Daily Load (TMDL) for sediment in the non-tidal Maryland 8-Digit Lower Gunpowder Falls watershed (2012 *Integrated Report of Surface Water Quality in Maryland* Assessment Unit ID: MD-02130802).

TMDLs are established to determine the pollutant load reductions needed to achieve and maintain water quality standards. A water quality standard is the combination of a designated use for a particular body of water and the water quality criteria designed to protect that use. Designated uses include activities such as swimming, drinking water supply, protection of aquatic life, and shellfish propagation and harvest. Water quality criteria consist of narrative statements and numeric values designed to protect the designated uses. Criteria may differ among waters with different designated uses.

The Lower Gunpowder Falls contains both non-tidal and tidal waters. The non-tidal waters are associated with the 8-digit watershed Lower Gunpowder Falls (02130802). The tidal waters are associated with the Chesapeake Bay segment Gunpowder River Oligohaline (GUNOH). The Maryland Department of the Environment (MDE) identified both segments of the Lower Gunpowder Falls watershed on the State's 2014 Integrated Report as impaired by multiple pollutants (MDE 2014). Table 1 identifies Integrated Report listings associated with this watershed (MDE 2014). A data solicitation for total suspended solids (TSS)/sediment was conducted by MDE in December 2014, and all readily available data have been considered.

PUBLIC REVIEW DRAFT

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					Channelization	4c
				-	Zinc	2
					Arsenic	2
					Selenium	2
					Lead	2
					Nickel	2
					Mercury	2
Chromium, hexavalent	2					
Cadmium	2					
Gunpowder River Oligohaline	GUNOH	Tidal	II - Seasonal Migratory Fish Spawning and Nursery Subcategory	2012	TN	4a
					TP	4a
			Open Water Fish and Shellfish	1996	TN	4a
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			Seasonal Shallow Water – Submerged Aquatic Vegetation	2010	TSS	4a

Footnote:

- Category 2 indicates the waterbody is meeting water quality standards for the identified substance
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The Maryland Surface Water Use Designation in the Code of Maryland Regulations (COMAR) for Lower Gunpowder Falls non-tidal mainstem (U. S. Route 95 upstream to Cromwell Bridge Road) is designated as Use Class IV (Recreational Trout Waters). Most tributaries to the mainstem, including Minebank Run and Jennifer Branch are Use Class I (Water Contact Recreation and Protection of Aquatic Life). Pierce Branch, Cowen Run, Haystack Branch, Sweathouse Branch, Long Green Creek, and their respective tributaries are designated as Use Class III (Nontidal Coldwater Aquatic Life). The mainstem Gunpowder Falls, east of Philadelphia Rd, is designated as Use Class II (Support of Estuarine and Marine Aquatic Life and Shellfish Harvesting) (COMAR 2015a,b,c). A map of the Designated Use Classes is provided in Figure 1.

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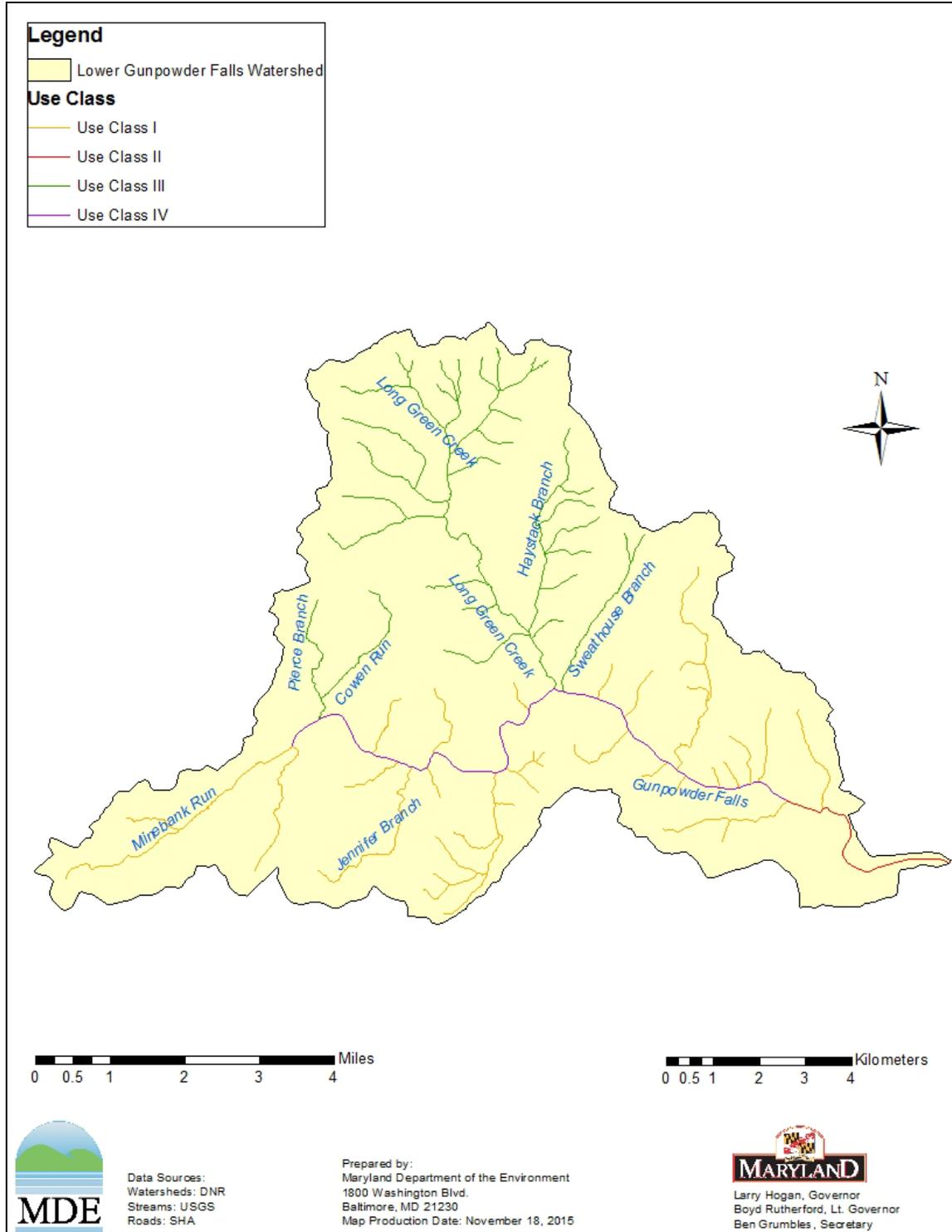


Figure 1: Designated Use Classes of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland

PUBLIC REVIEW DRAFT

The Lower Gunpowder Falls watershed was originally listed for biological impairment on the 2002 Integrated Report. The listing was based on the biological assessment methodology, which uses aquatic health scores, consisting of the Benthic Index of Biotic Integrity (BIBI) and Fish Index of Biotic Integrity (FIBI). These indices indicated that the biological metrics for the watershed exhibit a significant negative deviation from reference conditions (MDE 2002a).

In order to determine what stressor or stressors are impacting aquatic life, MDE's *Biological Stressor Identification* (BSID) methodology was applied. The Biological Stressor Identification (BSID) analysis for the Lower Gunpowder Falls watershed identified TSS/sediment/instream habitat, inorganic pollutants (i.e. chlorides, sulfates), and anthropogenic channelization as a potential stressors. TSS/sediment shows a significant association with degraded biological conditions; as much as 61% of the biologically impacted stream miles in the watershed may be degraded due extensive bar formation present, channel alteration, and marginal to poor epifaunal substrate. The instream habitat stressor group – which includes channelization present, marginal to poor instream habitat, marginal to poor riffle/run quality, and concrete/gabion present – may affect up to 70% of the biologically impacted stream miles in the watershed. Specifically, anthropogenic sources have resulted in altered habitat heterogeneity and possible elevated suspended sediment in the watershed, which are in turn the probable causes of impacts to biological communities. Further details of this analysis are presented in the document entitled, '*Watershed Report for Biological Impairment of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland Biological Stressor Identification Analysis Results and Interpretation*'. As a result of the BSID analysis, the non-tidal MD 8-digit Lower Gunpowder Falls watershed will be listed as impaired by TSS and requiring a TMDL.

The objective of this TMDL is to ensure that watershed sediment loads are at a level that supports the Use Class I/III/IV designation for the Lower Gunpowder Falls watershed. The TMDL will address water clarity problems and associated impacts to aquatic life in Lower Gunpowder Falls caused by high sediment and TSS concentrations.

2.0 SETTING AND WATER QUALITY DESCRIPTION

2.1 General Setting

Location

The Lower Gunpowder Falls watershed is located entirely within the central eastern portion of Baltimore County, Maryland. The watershed is located in the Coastal Plain and Eastern Piedmont regions, two of three distinct eco-regions identified in the Maryland Department of Natural Resources (MDDNR) Maryland Biological Stream Survey (MBSS) Index of Biological Integrity (IBI) metrics (Southerland *et al.* 2005). The Loch Raven Dam divides the Loch Raven watershed from the Lower Gunpowder Falls. The

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watershed begins at the Loch Raven Reservoir dam and flows generally towards the east. Where it meets the tidal portions of Gunpowder River, it becomes the Gunpowder River watershed. Major tributaries in the watershed include Minebank Run, Long Green Creek, Sweathouse Run, Haystack Branch, Jennifer Branch, and Bean Run. The watershed is within the Gunpowder River Basin (Maryland 6-digit 021308), which also includes the Prettyboy Reservoir, Loch Raven Reservoir, Little Gunpowder Falls, Bird River, Middle River – Browns, and the mainstem Gunpowder River as subwatersheds.

According to the Chesapeake Bay Program's Phase 5.3.2 watershed model, the total drainage area of the Maryland 8-digit watershed is approximately 29,200 acres not including water/wetlands. Approximately 80 acres of the watershed area is covered by water. The total population in the Lower Gunpowder Falls watershed is approximately 61,400 (US Census Bureau 2010).

There are no "high quality," or Tier II, stream segments [BIBI and FIBI aquatic life assessment scores > 4 (scale 1-5)] located within the watershed. Tier II segments would require the implementation of Maryland's anti-degradation policy (COMAR 2012d; MDE 2011).

Geology/Soils

The Lower Gunpowder Falls watershed lies predominately in the Eastern Piedmont geologic province of Maryland, with the lower portion of the watershed extending slightly into the Coastal Plain province. The Piedmont geologic province is characterized by gentle to steep rolling topography, low hills, and ridges. The surficial geology is characterized by crystalline igneous and metamorphic rocks of volcanic origin consisting primarily of schist and gneiss. The Coastal Plain geologic province is characterized by deep sedimentary soil complexes that support broad meandering streams (MDDNR 2009; MGS 2012; MDE 2000). The surface elevations range from approximately 680 feet to sea level at the Chesapeake Bay shoreline.

Soil type for the Lower Gunpowder Falls watershed is characterized by the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) into 4 hydrologic soil groups: Group A soils have high infiltration rates and are typically deep well drained/excessively drained sands or gravels; Group B soils have moderate infiltration rates and consist of soils that are moderately deep to deep and moderately well to well drained soils, with moderately fine/coarse textures; Group C soils have slow infiltration rates with a layer that impedes downward water movement, and they primarily have moderately fine-to-fine textures; Group D soils have very slow infiltration rates consisting of clay soils with a permanently high water table that are often shallow over nearly impervious material. The actual Lower Gunpowder Falls watershed is comprised primarily of Group B soils (65.4%), Group C soils (14.8%), and Group D soils (18.1%), with a small portion of the watershed consisting of Group A soils (1.1%) (USDA 2006).

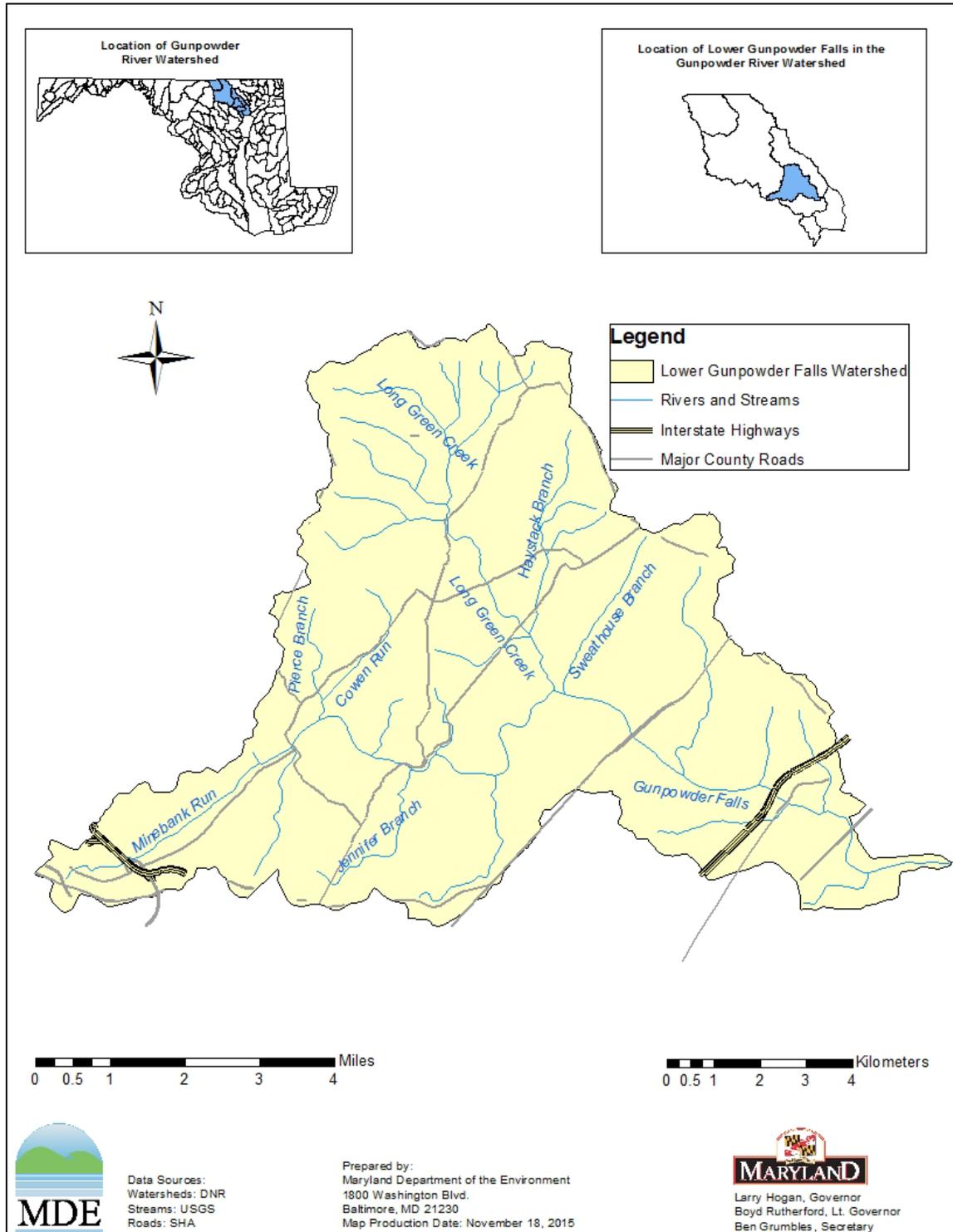


Figure 2: Location Map of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland

PUBLIC REVIEW DRAFT

2.1.1 Land-use

Land-use Methodology

The land-use framework used to develop this TMDL was originally developed for the Chesapeake Bay Program Phase 5.3.2 (CBP P5.3.2) Watershed Model.¹ CBP P5.3.2 land-use was based on two distinct stages of development.

The first stage consists of the development of the Chesapeake Bay Watershed Land-Cover Data (CBLCD) series of Geographic Information System (GIS) datasets. These datasets provide a 30-meter resolution raster representation of land-cover in the Chesapeake Bay watershed, based on sixteen Anderson Level two land-cover classes. The CBLCD basemap, representing 2001 conditions, was primarily derived from the Multi-Resolution Land Characteristics (MRLC) Consortium's National Land-Cover Data (NLCD) and the National Oceanic and Atmospheric Administration's (NOAA) Coastal Change Analysis Program's (CCAP) Land-Cover Data. By applying Cross Correlation Analysis to Landsat 5 Thematic Mapper and Landsat 7 Enhanced Thematic Mapper satellite imagery, the US Geological Survey's (USGS) contractor, MDA Federal, generated CBLCD datasets for 1984, 1992, and 2006 from the baseline 2001 dataset. The watershed model documentation, *Chesapeake Bay Phase 5.3 Community Watershed Model* (USEPA 2010b), describes the development of the CBLCD series in more detail. USGS and NOAA also developed an impervious cover dataset from Landsat satellite imagery for the CBLCD basemap, which was used to estimate the percent impervious cover associated with CBLCD developed land-cover classifications.

The second stage consists of using ancillary information for: 1) the creation of a modified 2006 CBLCD raster dataset, and 2) the subsequent development of the CBP P5.3.2 land-use framework in tabular format. Estimates of the urban footprint in the 2006 CBLCD were extensively modified using supplemental datasets. NAVTEQ street data (secondary and primary roads) and institutional delineations were overlaid with the 2006 CBLCD land-cover and used to reclassify underlying pixels. Certain areas adjacent to the secondary road network were also reclassified based on assumptions developed by USGS researchers, in order to capture residential development (*i.e.*, subdivisions not being picked up by the satellite in the CBLCD). In addition to spatially modifying the 2006 CBLCD, the following datasets were used to supplement the developed land cover data in the final CBP P5.3.2 land-use framework: US Census housing unit data, Maryland Department of Planning (MDP) Property View data, and estimates of impervious coefficients for rural residential properties (determined via a sampling of these properties using aerial photography). This additional information was used to estimate the extent of impervious area in roadways and residential lots. Acres of construction and extractive land-uses were determined independently (Claggett, Irani, and Thompson 2012). Finally, in order to develop accurate agricultural land-use acreages, the CBP P5.3.2 incorporated

¹ The EPA Chesapeake Bay Program developed the first watershed model in 1982. There have been many upgrades since the first phase of this model. The CBP P5.3.2 is the latest version and it was developed to estimate flow, nutrients, and sediment loads to the Bay.

PUBLIC REVIEW DRAFT

county level US Agricultural Census data (USDA 1982, 1987, 1992, 1997, 2002). The watershed model documentation, *Chesapeake Bay Phase 5.3 Community Watershed Model* (US USEPA 2010b), describes these modifications in more detail.

The result of these modifications is that CBP P5.3.2 land-use does not exist in a single GIS coverage; instead, it is only available in a tabular format. The CBP P5.3.2 watershed model is comprised of 30 land-uses. Most of these land-uses are differentiated only by their pollutant unit loading rates. The land-uses are divided into 13 classes with distinct sediment erosion rates. Table 2 lists the CBP P5.3.2 generalized land-uses, detailed land-uses, which are classified by their sediment erosion rates, and the acres of each land-use in the Lower Gunpowder Falls watershed. The land-use acreage is based on the CBP P5.3.2 2009 Progress Scenario.

Lower Gunpowder Falls Watershed Land-Use Distribution

The land-use distribution of the Lower Gunpowder Falls watershed consists primarily of forest (41.9%) and urban land (40.1%), with smaller amounts of crop (13.9%) and pasture (3.7%). A detailed summary of the watershed land-use areas is presented in Table 2, and a land-use map is provided in Figure 3.

Table 2: Land-Use Percentage Distribution for the Lower Gunpowder Falls Watershed

General Land Use	Detailed Land-Use	Area (Acres)	Percent (%)	Grouped Percent of Total
Forest	Forest	12,132	41.5%	41.9%
	Harvested Forest	122	0.4%	
AFOs	Animal Feeding Operations	8	0.0%	0.0%
CAFOs	Concentrated Animal Feeding Operations	1	0.0%	0.0%
Pasture	Pasture	1,084	3.7%	3.7%
Crop	Crop	4,059	13.9%	13.9%
Nursery	Nursery	25	0.1%	0.1%
Regulated Urban	Construction	263	0.9%	40.1%
	Developed	11,444	39.1%	
	Extractive	19	0.1%	
Water	Water	84	0.3%	0.3%
Total		29,240	100.0%	100.0%

PUBLIC REVIEW DRAFT

Note: Individual values may not add to total load due to rounding.

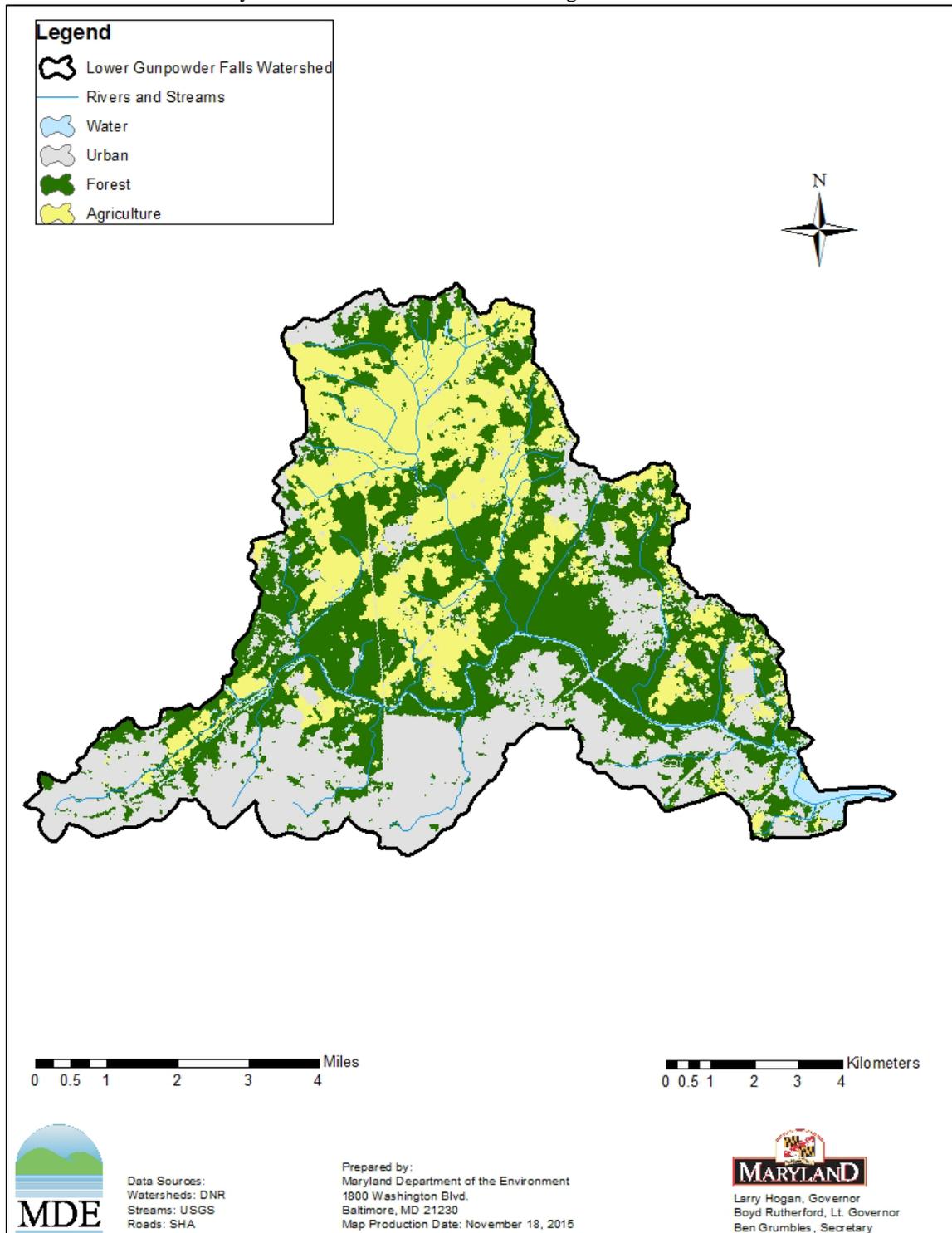


Figure 3: Land-use of the Lower Gunpowder Falls Watershed

PUBLIC REVIEW DRAFT

2.2 Source Assessment

The Lower Gunpowder Falls watershed total baseline sediment load consists of nonpoint sources loads, National Pollutant Discharge Elimination System (NPDES) Stormwater loads, and Process Water loads. This section summarizes the methods used to derive each of these distinct source categories.

2.2.1 Nonpoint Source Assessment

In this document, the nonpoint source loads account for all sediment loads not covered under a NPDES permit within the Lower Gunpowder Falls watershed. In general, these are rainfall driven land-use based loads from agricultural and forest lands. This section provides the background and methods for determining the nonpoint source baseline loads generated within the Lower Gunpowder Falls watershed (Nonpoint Source BL_{LGF}).

General Load Estimation Methodology

Nonpoint source sediment loads generated within the Lower Gunpowder Falls watershed are estimated based on the *edge-of-stream (EOS)* loads from the CBP P5.3.2 watershed model 2009 Progress Scenario. Within the CBP P5.3.2 watershed model, EOS sediment loads are calculated based on the fact that not all of the *edge-of-field (EOF)* sediment load is delivered to the stream or river (some of it is stored on fields down slope, at the foot of hillsides, or in smaller rivers or streams that are not represented in the model). To calculate the actual EOS loads, a *sediment delivery factor (SDF)* (the ratio of sediment reaching a basin outlet compared to the total erosion within the basin) is used. Details of the methods used to calculate sediment load have been documented in the report entitled *Chesapeake Bay Phase 5 Community Watershed Model* (USEPA 2010b). A summary is presented below.

Edge-of-Field Target Erosion Rate Methodology

Edge-of-field erosion can be defined as erosion or sediment loss from any particular land surface. EOF target erosion rates are the values used in the calibration of the CBP model, based on literature values. EOF target erosion rates for agricultural land-uses and forested land-use were based on erosion rates determined by the Natural Resource Inventory (NRI). NRI is a statistical survey of land-use and natural resource conditions conducted by the Natural Resources Conservation Service (NRCS) (USDA 2006). The sampling methodology is explained by Nusser and Goebel (1997).

Estimates of average annual erosion rates for pasture and cropland are available on a county basis at five-year intervals, starting in 1982. Erosion rates for forested land-uses are not available on a county basis from NRI; however, for the purpose of the Chesapeake Bay Program Phase 4.3 (CBP P4.3) watershed model, NRI calculated average annual erosion rates for forested land-use on a watershed basis. These rates are still being used as targets in the CBP P5.3.2 model.

PUBLIC REVIEW DRAFT

The average value of the 1982 and 1987 surveys was used as the basis for EOF target rates for pasture and cropland. Rates for urban pervious, urban impervious, extractive, and barren land were based on a combination of best professional judgment, literature analysis, and regression analysis. The EOF erosion rates do not reflect best management practices (BMPs) or other soil conservation policies introduced in the wake of the effort to restore the Chesapeake Bay. To compensate for this, BMPs are applied to the modeled EOS loads in the CBP P5.3.2 2009 Progress Scenario. BMP data, representing BMPs in place in 2009, was collected by the Chesapeake Bay Program (CBP), and TSS reduction efficiencies have been estimated by CBP for specific types of BMPs based on peer reviewed studies, data collected by local jurisdictions, and an analysis of available literature values. For further details regarding EOF erosion rates, please see Section 9.2.1 of the *Chesapeake Bay Phase 5 Community Watershed Model* (USEPA 2010b). Table 3 lists EOF erosion rates specific to Baltimore County, where the Lower Gunpowder Falls watershed is located.

Table 3: Target EOF Loading Rates (ton/ac/yr) by Land-Use

Land-use	Data Source	Baltimore County (ton/acre/yr)
Forest	NRI (1987)	0.46
Harvested Forest	Literature values	3
Nursery	Equivalent to conventional till	12.42
Pasture	NRI average (1982-1987)	1.29
Animal Feeding Operations	NRI pasture average (1982-1987) multiplied by 9	11.61
Hay	Adjusted NRI average (1982-1987)	3.18
Conventional Till	Adjusted NRI average (1982 – 1987)	12.42
Conservation Till	Adjusted NRI average (1982 – 1987)	7.45
Pervious Urban	Regression Analysis	0.74
Extractive	Literature values/best professional judgment	10
Barren (Construction)	Literature values	12.0
Impervious Urban	Regression Analysis	5.18

Edge-of-Stream Sediment Loads

EOS sediment loads are the loads that enter the modeled river reaches. Modeled river reaches are those with discharges of 100 cubic feet per second (cfs) or greater. (Exceptions were made for some river reaches that had useful monitoring data but were less than 100 cfs.) EOS sediment loads represent not only the erosion from the land but all of the intervening processes of deposition on hillsides and sediment transport through smaller rivers and streams. The formula for the EOS load calculation within the CBP P5.3.2 watershed model is as follows:

$$\sum_i^n EOS = Acres_i * EOF_i * SDF_i \quad (\text{Equation 2.1})$$

where:

n = number of land-use classifications

i = land-use classification

EOS = Edge of stream load, tons per year (ton/yr)

Acres = acreage for land-use i

EOF = Edge-of-field erosion rate for land-use i, ton/acre/yr

SDF = sediment delivery factor for land-use i

2.2.2 Point Source Assessment

A list of active permitted point sources that contribute to the sediment load in the Lower Gunpowder Falls watershed was compiled using best available resources. The types of permits identified include individual municipal permits, NPDES stormwater permits, and the general permit for stormwater discharges from construction sites. The permits can be grouped into two categories: process water and stormwater. The process water category includes those loads generated by continuous discharge sources whose permits have TSS limits. Other permits that do not meet these conditions are considered *de minimis* in terms of the total sediment load. The stormwater category includes all NPDES regulated stormwater discharges. The technical memorandum to this document, entitled *Significant Sediment Point Sources in the Non-Tidal Lower Gunpowder Falls Watershed*, identifies all the process water permits and NPDES regulated stormwater discharges that contribute to the sediment load in the Lower Gunpowder Falls watershed.

The baseline sediment loads for the process water permits (Process Water BL_{LGF}) are calculated based on their permitted TSS limits (average monthly or weekly concentration values) and corresponding flow information. The general permit for stormwater discharges from construction sites identified throughout the Lower Gunpowder Falls watershed are regulated based on BMPs and do not include TSS limits. In the absence of TSS limits, the NPDES regulated stormwater baseline load (NPDES Stormwater BL_{LGF}) is calculated using the CBP P5.3.2 Progress Scenario urban land-use EOS loads (as per Equation 2.1) associated with these permits. The technical memorandum to this

PUBLIC REVIEW DRAFT

document entitled *Significant Sediment Point Sources in the Non-Tidal Lower Gunpowder Falls Watershed* provides detailed information regarding the calculation of the Lower Gunpowder Falls watershed Process Water BL_{LGF} and NPDES Stormwater BL_{LGF} .

2.2.4 Summary of Baseline Loads

Table 4 summarizes the Lower Gunpowder Falls baseline sediment load, reported in ton/yr and presented in terms of Nonpoint Source Baseline Loads and NPDES Stormwater and Process Water Baseline Loads.

Table 4: Lower Gunpowder Falls Baseline Sediment Loads (ton/yr)

Total Baseline Load (ton/yr)	=	Nonpoint Source BL_{LGF}	+	NPDES Stormwater BL_{LGF}	+	Process Water BL_{LGF}
6,916	=	2,589	+	4,319	+	8

Table 5 presents a breakdown of Lower Gunpowder Falls Total Baseline Sediment Load, detailing loads per land-use or other source category. The largest portion of the sediment load is regulated urban sources (62.5%). The remainder of the sediment load is primarily from cropland (28.3%), forest (6.6%), and pasture (1.7%).

PUBLIC REVIEW DRAFT

Table 5: Detailed Baseline Sediment Loads Within the Lower Gunpowder Falls Watershed

General Land Use	Detailed Land-Use	Tons	Percent (%)	Grouped Percent of Total
Forest	Forest	426	6.2%	6.6%
	Harvested Forest	29	0.4%	
AFOs	Animal Feeding Operations	9	0.1%	0.1%
CAFOs	Concentrated Animal Feeding Operations	1	0.0%	0.0%
Pasture	Pasture	115	1.7%	1.7%
Crop	Crop	1,959	28.4%	28.3%
Nursery	Nursery	50	0.7%	0.7%
Regulated Urban	Construction	812	11.8%	62.5%
	Developed	3,477	50.3%	
	Extractive	29	0.4%	
Point Sources	Industrial Point Sources	0	0.0%	0.1%
	Municipal Point Sources	8	0.1%	
Total		6,916	100.0%	100.0%

Note: Individual values may not add to total load due to rounding.

2.3 Water Quality Characterization

The non-tidal Lower Gunpowder Falls watershed was identified on Maryland's 2012 Integrated Report as having multiple impairments. To refine the listing for impacts to biological communities, Maryland conducted a stressor identification analysis. Details of this analysis are presented below and in the document entitled, *Watershed Report for Biological Impairment of the Lower Gunpowder Falls Watershed in Baltimore County, Maryland Biological Stressor Identification Analysis Results and Interpretation*.

Currently in Maryland, there are no specific numeric criteria for suspended sediments. Therefore, to determine whether aquatic life is impacted by elevated sediment loads, MDE's BSID methodology was applied. The primary goal of the BSID analysis is to identify the most probable cause(s) for observed biological impairments throughout MD's 8-digit watersheds (MDE 2009).

The BSID analysis applies a case-control, risk-based, weight-of-evidence approach to identify potential causes of biological impairment. The risk-based approach estimates the strength of association between various stressors and an impaired biological community. The BSID analysis then identifies individual stressors as probable or unlikely causes of the poor biological conditions within a given watershed, and subsequently reviews ecological plausibility. Finally, the analysis concludes whether or not these individual stressors or groups of stressors are contributing to the impairment (MDE 2009).

The primary dataset for BSID analysis includes MDDNR-MBSS Round 2 and Round 3 data (collected between 2000-2009) because it provides a broad spectrum of paired data variables, which allow for a more comprehensive stressor analysis. MDDNR-MBSS Round 1 can also be used if there is limited Round 2 and 3 data. The MBSS is a robust statewide probability-based sampling survey for assessing the biological conditions of 1st through 4th order, non-tidal streams (Klauda et al. 1998; Roth et al. 2005). It uses a fixed length (75 meter) randomly selected stream segment for collecting site level information within a primary sampling unit (PSU), also defined as a watershed. The randomly selected stream segments, from which field data are collected, are selected using either stratified random sampling with proportional allocation, or simple random sampling (Cochran 1977). The random sample design allows for unbiased estimates of overall watershed conditions. Thus, the dataset facilitated case-control analyses because: 1) in-stream biological data are paired with chemical, physical, and land-use data variables that could be identified as possible stressors; and 2) it uses a probabilistic statewide monitoring design.

The BSID analysis combines the individual stressors (physical and chemical variables) into three generalized parameter groups in order to assess how the resulting impacts of these stressors can alter the biological community and structure. The three generalized parameter groups include: sediment, habitat, and water chemistry. Identification of a sediment stressor as contributing to the biological impairment is based on the results of the individual stressor associations within the sediment parameter grouping, which reveal the effects of sediment related impacts on stream biota (MDE 2009).

PUBLIC REVIEW DRAFT

Since it uses MBSS data, the BSID applies only to 1st through 4th order streams in a watershed. In larger order mainstem rivers and streams, MDDNR CORE/TREND program data is used to assess the support of aquatic life. The program collected benthic macroinvertebrate data between 1976 and 2006. These data were used to calculate four benthic community measures: total number of taxa, the Shannon Weiner Diversity Index (DI), the modified Hilsenhoff Biotic Index (HBI), and percent *Ephemeroptera*, *Plecoptera*, and *Trichoptera* (EPT). MDDNR has extensive benthic macroinvertebrate monitoring data for one station on the mainstem of the Lower Gunpowder Falls through the CORE/TREND program. This station has 30 years of benthic macroinvertebrate data (MDDNR 2009).

Lower Gunpowder Falls Watershed Monitoring Stations

A total of 15 water quality monitoring stations were used to characterize the Lower Gunpowder Falls watershed for the purpose of this TMDL. The biological assessment was based on the combined results of MBSS Round 1 and Round 2 data, which includes thirteen stations. The BSID analysis used the ten biological/physical habitat monitoring stations from the MBSS Round 2 data collection. Additionally, two monitoring station from the Maryland CORE/TREND monitoring network were applied within the TMDL analysis. All stations are listed in Table 6 and presented in Figure 4.

Table 6: Monitoring Stations in the Lower Gunpowder Falls Watershed

Site Number	Sponsor	Site Type	Location	Latitude (decimal degrees)	Longitude (decimal degrees)
GUN0125	DNR	CORE/TREND	Cromwell Bridge Road	39.426	76.529
GUN0036	DNR	CORE/TREND	Route 7	39.414	76.407
BA-P-203-215-96	DNR	MBSS Round 1	Cowen Run	39.432	76.522
BA-P-315-301-96	DNR	MBSS Round 1	Long Green Creek	39.468	76.490
BA-P-427-107-96	DNR	MBSS Round 1	Long Green Creek Unnamed Tributary 1	39.442	76.486
LOGU-103-R-2002	DNR	MBSS Round 2	Jennifer Branch	39.404	76.511
LOGU-106-R-2002	DNR	MBSS Round 2	Sweathouse Branch	39.450	76.453
LOGU-108-R-2002	DNR	MBSS Round 2	Jennifer Branch	39.399	76.519
LOGU-109-R-2002	DNR	MBSS Round 2	Cowen Run Unnamed Tributary 1	39.441	76.523
LOGU-190-R-2002	DNR	MBSS Round 2	Minebank Run	39.402	76.574
LOGU-202-R-2002	DNR	MBSS Round 2	Cowen Run	39.431	76.523
LOGU-211-R-2002	DNR	MBSS Round 2	Long Green Creek	39.486	76.484
LOGU-280-R-2002	DNR	MBSS Round 2	Minebank Run	39.421	76.540
LOGU-285-R-2002	DNR	MBSS Round 2	Minebank Run	39.415	76.550
LOGU-305-R-2002	DNR	MBSS Round 2	Long Green Creek	39.470	76.491

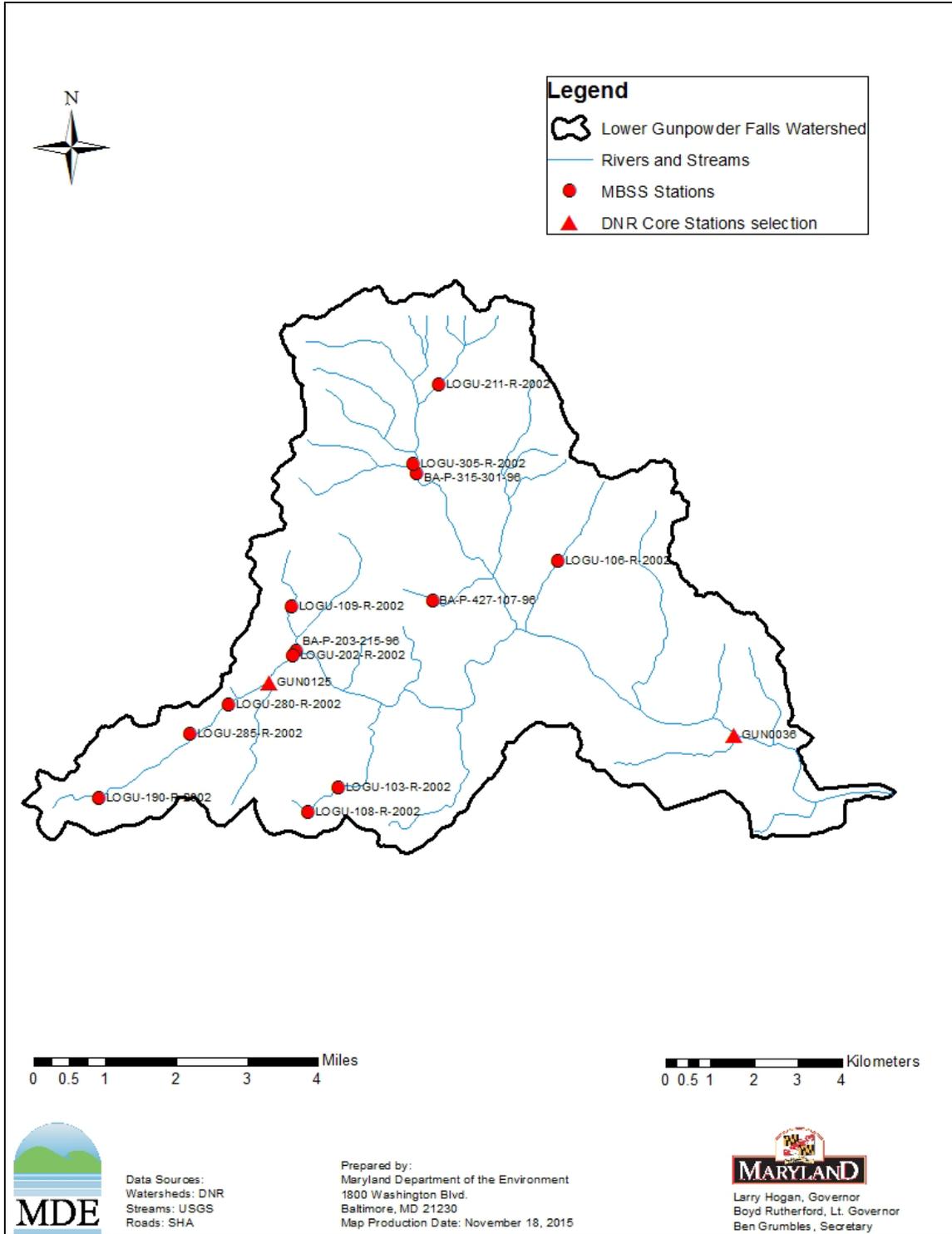


Figure 4: Monitoring Stations in the Lower Gunpowder Falls Watershed

PUBLIC REVIEW DRAFT

2.4 Water Quality Impairment

The Maryland Surface Water Use Designation in the Code of Maryland Regulations (COMAR) for Lower Gunpowder Falls non-tidal mainstem (U. S. Route 95 upstream to Cromwell Bridge Road) is designated as Use Class IV (Recreational Trout Waters). Most tributaries to the mainstem, including Minebank Run, Jennifer Branch, and Broad Run are Use Class I (Water Contact Recreation and Protection of Aquatic Life). Pierce Branch, Cowen Run, Haystack Branch, Sweathouse Branch, Long Green Creek, and their respective tributaries are designated as Use Class III – (Nontidal Coldwater Aquatic Life). (COMAR 2015a,b,c). The water quality impairment of the Lower Gunpowder Falls watershed addressed by this TMDL is caused by an elevated sediment load beyond a level that the watershed can sustain; thereby causing sediment related impacts that cannot support aquatic life. Assessment of aquatic life is based on BIBI and FIBI scores, as demonstrated via the BSID analysis for the watershed.

The Lower Gunpowder Falls watershed was originally listed on Maryland's 2002 Integrated Report as impaired for impacts to biological communities. The biological assessment was based on the combined results of MBSS Round 1 (1995-1997) and Round 2 (2000-2004) data, which includes thirteen stations. Seven of the thirteen stations, or 54% of the stream miles in the watershed, are assessed as having BIBI and/or FIBI scores significantly lower than 3.0 (on a scale of 1 to 5) (MDE 2012c). See Figure 4 and Table 6 for station locations and information.

The results of the BSID analysis for the Lower Gunpowder Falls watershed are presented in a report entitled *Watershed Report for Biological Impairment of the Non-Tidal Lower Gunpowder Falls Watershed in Baltimore County, Maryland Biological Stressor Identification Analysis Results and Interpretation*. The report states that the degradation of biological communities in the Lower Gunpowder Falls watershed is strongly associated with anthropogenic impacts, extensive bar formation, poor channel alteration, marginal to poor epifaunal substrate, channelization present, marginal to poor instream habitat structure, poor and marginal to poor riffle/run quality, low dissolved oxygen saturation, high chlorides, high sulfates, and high conductivity. (MDE 2012c).

The BSID analysis determined that the biological impairment in the Lower Gunpowder Falls watershed is due in part to stressors within the sediment parameter and instream habitat groupings. Specifically; bar formation, channel alteration, epifaunal substrate, channelization, instream habitat structure, riffle/run quality, and concrete/gabion present were contributing to the biological impairment in the watershed. Overall, stressors within the sediment parameter grouping were identified as having a statistically significant association with impaired biological communities at approximately 61% of the sites with BIBI and/or FIBI scores significantly less than 3.0 throughout the watershed (MDE 2014). Therefore, since sediment is identified as a stressor to the biological communities in the Lower Gunpowder Falls watershed, the watershed has been listed as impaired by sediment in the Integrated Report, and a TMDL is required.

PUBLIC REVIEW DRAFT

As discussed in Section 2.3, the BSID applies only to 1st through 4th order streams in a watershed. Therefore, aquatic life in the Lower Gunpowder Falls watershed mainstem is assessed using DNR CORE/TREND program data. As shown in Table 7, the biological monitoring results from two DNR CORE/TREND stations along the Lower Gunpowder Falls watershed mainstem indicate that mainstem water quality can be classified as fair to good. Statistical analysis of the long term CORE/TREND data indicates that since 1976, water quality at one station (GUN0036) has not changed and water quality at the other station has shown moderate improvement (GUN0125). These results are based on percent EPT, taxa number, biotic index, and diversity index (MDDNR 2009). Based on these results biological communities are not considered impaired (or impacted) in the mainstem of the Lower Gunpowder Falls. Therefore, sediment is not a stressor in the mainstem.

Table 7: Lower Gunpowder Falls Watershed CORE/TREND Data

Site Number	Current Water Quality Status	Trend Since 1970's
GUN0036	Fair/Good	No Change
GUN0125	Good	Moderate Improvement

PUBLIC REVIEW DRAFT

3.0 TARGETED WATER QUALITY GOAL

The objective of the sediment TMDL established herein is to reduce sediment loads, and detrimental, negative effects on aquatic life in the Lower Gunpowder Falls watershed, to levels that support the Use Class I/III/IV designations for the watershed. Assessment of aquatic life is based on Maryland's biocriteria protocol, which evaluates both the amount and diversity of the benthic and fish community through the use of the IBI (Roth et al. 1998, 2000; Stribling et al. 1998; MDE 2008).

Based on benthic monitoring results at the CORE/TREND stations, presented in Section 2.4, biological communities are not considered impaired (or impacted) by sediment in the mainstem of the Lower Gunpowder Falls. Therefore, the TMDL will be restricted to the 1st through 4th order tributaries within the watershed and will exclude the Lower Gunpowder Falls mainstem.

Excessive sediment has been identified by the USEPA as the leading cause of impairment of our nation's waters, and as contributing to the decline of populations of aquatic life in North America (USEPA 2003a). Suspended sediment in streams may reduce visibility, preventing fish from seeing their prey, and may clog gills and filter feeding mechanisms of fish and benthic (bottom-dwelling) organisms. Excessive deposition of sediment on streambeds may bury eggs or larvae of fish and benthic macroinvertebrates, or degrade habitat by clogging the interstitial spaces between sand and gravel particles.

Reductions in sediment loads are expected to result from decreased watershed erosion, which will then lead to improved benthic and fish habitat conditions. Specifically, sediment load reductions are expected to result in an increase in the number of benthic sensitive species present, an increase in the available and suitable habitat for a benthic community, a possible decrease in fine sediment (fines), and improved stream habitat diversity, all of which will result in improved water quality.

The TMDL, however, will not completely resolve the impairment to biological communities within the watershed. Since the BSID watershed analysis also identifies inorganic pollutants and anthropogenic channelization as possible stressors impacting the biological conditions, additional TMDL or TMDLs may be needed to address the impacts to biological communities. This impairment to aquatic life will only be fully addressed when all impairing substances identified as impacting biological communities in the watershed are reduced to levels that will meet water quality standards, as established in future TMDLs for those substances (MDE 2009, 2012c).

4.0 TOTAL MAXIMUM DAILY LOADS AND SOURCE ALLOCATION

4.1 Overview

This section describes how the sediment TMDL and the corresponding allocations were developed for the Lower Gunpowder Falls watershed. Section 4.2 describes the analysis framework for estimating sediment loading rates and the assimilative capacity of the watershed stream system. Section 4.3 summarizes the scenarios that were used in the analysis and presents results. Section 4.4 discusses critical conditions and seasonality. Section 4.5 explains the calculations of TMDL loading caps. Section 4.6 details the load allocations, and Section 4.7 explains the rationale for the MOS. Finally, Section 4.8 summarizes the TMDL.

4.2 Analysis Framework

Since there are no specific numeric criteria in Maryland that quantify the impact of sediment on the aquatic life of non-tidal stream systems, a reference watershed approach will be used to establish the TMDL. In order to use a reference watershed approach, sediment loads must be estimated using a watershed model. For this analysis, the CBP P5.3.2 model was used to calculate the sediment loads used in the reference watershed approach.

Watershed Model

The watershed model chosen to estimate the sediment loads for the Lower Gunpowder Falls watershed TMDL was the CBP P5.3.2 watershed model, and specifically the EOS sediment loads. The spatial domain of the CBP P5.3.2 watershed model segmentation aggregates to the MD 8-digit watersheds, which is closely consistent with the impairment listing. The nonpoint source baseline sediment loads generated within the Lower Gunpowder Falls watershed are based on the EOS loads from the CBP P5.3.2 watershed model 2009 Progress Scenario. CBP P5.3.2 Progress Scenario EOS loads are calculated as the sum of individual land-use EOS loads within the watershed and represent a long-term average loading rate. Individual 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 EOF loading rate, and loss from the EOF to the main channel. BMP data and reduction efficiencies are then subsequently applied to produce the final EOS loads. The loss from the EOF to the main channel is the *sediment delivery factor* and is defined as the ratio of the sediment load reaching a basin outlet to the total erosion within the basin. A *sediment delivery factor* is estimated for each land-use type based on the proximity of the land-use to the main channel. Thus, as the distance to the main channel increases, more sediment is stored within the watershed (i.e., *sediment delivery factor* decreases). Details of the data sources for the unit loading rates can be found in Section 2.2 of this report.

Reference Watershed Approach

In order to quantify the impact of sediment on the aquatic life of non-tidal stream systems, a reference watershed TMDL approach was used to establish a *sediment loading threshold* (Currey et al. 2006). Reference watersheds were determined based on Maryland's biocriteria methodology. The biocriteria methodology assesses biological impairment at the watershed scale based on the percentage of MBSS monitoring stations, translated into watershed stream miles, that have BIBI and/or FIBI scores lower than the Minimum Allowable IBI Limit (MAL). The MAL represents the threshold under which a watershed is listed as impaired for biology and is calculated based on the average annual allowable IBI value of 3.0 (on a scale of 1 to 5), the coefficient of variation of annual sentinel site results, and an assumed normal distribution. It accounts for annual variability and helps to avoid classification errors (i.e., false positives) when assessing for biological impairments (Roth et al. 1998, 2000; Stribling et al. 1998; MDE 2008).

Comparison of sediment loads from impaired watersheds to loads from reference watersheds requires that the watersheds be similar in physical and hydrological characteristics. To satisfy this requirement, Currey et al. (2006) selected reference watersheds only from the Highland and Piedmont physiographic regions. This region is consistent with the non-coastal region that was identified in the 1998 development of FIBI and subsequently used in the development of BIBI (Roth et al. 1998; Stribling et al. 1998).

To further reduce the effect of the variability within the Highland and Piedmont physiographic regions (i.e., soils, slope, etc.), the watershed sediment loads were then normalized by a constant background condition, the all forested watershed condition. This new normalized term, defined as the *forest normalized sediment load* (Y_n), represents how many times greater the current watershed sediment load is than the *all forested sediment load* (y_{for}). The y_{for} is a modeled simulation of what the sediment load would be if the watershed were all forest, instead of mixed land use. It is calculated using the CBP 5.3.2 model. The *forest normalized sediment load* for this TMDL is calculated as the current watershed sediment load divided by the *all forested sediment load*. The equation for the *forest normalized sediment load* is as follows:

$$Y_n = \frac{y_{ws}}{y_{for}} \quad \text{(Equation 4.1)}$$

Where:

Y_n = forest normalized sediment load

y_{ws} = current watershed sediment load (ton/yr)

y_{for} = all forested sediment load (ton/yr)

Eleven reference watersheds were selected from the Highland and Piedmont physiographic region. Reference watershed *forest normalized sediment loads* were calculated using CBP P5.3.2 watershed model 2009 Progress Scenario EOS loads. The

PUBLIC REVIEW DRAFT

median and 75th percentile of the reference watershed *forest normalized sediment loads* were calculated and found to be 3.6 and 7.2 respectively. The median value of 3.6 was established as the sediment loading threshold as an environmentally conservative approach to develop this TMDL (see Appendix A for more details).

The *forest normalized sediment load* for the Lower Gunpowder Falls watershed, estimated as 6.7, was calculated using CBP P5.3.2 2009 Progress Scenario EOS loads, to best represent current conditions. (See Calculation 4.1) A comparison of the Lower Gunpowder Falls watershed *forest normalized sediment loads* to the *forest normalized reference sediment load* (also referred to as the *sediment loading threshold*) demonstrates that the watershed exceeds the *sediment loading threshold*, indicating that it is receiving loads above the maximum allowable load that it can sustain and still meet water quality standards.

$$Y_n = \frac{y_{ws}}{y_{for}} = \frac{6,914 \text{ ton/yr}}{1,027 \text{ ton/yr}} = 6.7 \quad (\text{Calculation 4.1})$$

4.3 Scenario Descriptions and Results

The following analyses allow a comparison of baseline conditions (under which water quality problems exist) with future conditions, which project the water quality response to various simulated sediment load reductions. The analyses are grouped according to baseline conditions and future conditions associated with TMDLs.

Baseline Conditions

The baseline conditions are intended to provide a point of reference by which to compare the future scenario that simulates conditions of a TMDL. The baseline conditions typically reflect an approximation of nonpoint source loads and any upstream loads during the monitoring time frame, as well as estimated point source loads based on discharge data for the same period.

The Lower Gunpowder Falls watershed baseline sediment loads are estimated using the land-use and EOS sediment loading rates from the CBP P5.3.2 2009 Progress Scenario. The 2009 Progress Scenario was chosen because it is used as the baseline year in the Chesapeake Bay TMDL. The 2009 Progress Scenario represents 2009 land-use and BMP implementation simulated using precipitation and other meteorological inputs from the period 1990-2000 to represent variable hydrological conditions, thereby addressing annual changes in hydrology and capturing wet, average and dry years. The period 1991-2000 is the baseline hydrological period for the Chesapeake Bay TMDL.

Lower Gunpowder Falls watershed loading calculations, based on the CBP P5.3.2 watershed model segmentation scheme, are represented by multiple CBP P5.3.2 watershed model segments. The sediment loads from these segments are combined to represent the baseline condition. The point source sediment loads are estimated based on

PUBLIC REVIEW DRAFT

the existing permit information. Details of these loading source estimates can be found in Section 2.2 and the technical memorandum to this document entitled *Significant Sediment Point Sources in the Lower Gunpowder Falls Watershed*.

TMDL Conditions

This scenario represents the future conditions of maximum allowable sediment loads that will be at a level to support aquatic life. In the TMDL calculation, the allowable load for the impaired watershed is calculated as the product of the *sediment loading threshold* (determined from watersheds with a healthy biological community) and the Lower Gunpowder Falls *all forested sediment load* (see Section 4.2). The resulting load is considered the maximum allowable load the watershed can sustain and support aquatic life.

The TMDL loading and associated reductions are averaged at the watershed scale; however, it is important to recognize that some subwatersheds may require higher reductions than others, depending on the distribution of the land-use.

The formula for estimating the TMDL is as follows:

$$TMDL = \sum_{i=1}^n Yn_{ref} \cdot y_{forest\ i} \quad (\text{Equation 4.2})$$

Where:

TMDL = allowable load for impaired watershed (ton/yr)

Yn_{ref} = sediment loading threshold = forest normalized reference sediment load

$y_{forest\ i}$ = all forested sediment load for CBP P5.3.2 model segment i (ton/yr)

i = CBP P5.3.2 model segment

n = number of CBP P5.3.2 model segments in watershed

The Lower Gunpowder Falls watershed allowable sediment load is estimated using Equation 4.2.

4.4 Critical Condition and Seasonality

USEPA's regulations require TMDLs to take into account seasonality and critical conditions for stream flow, loading, and water quality parameters (CFR 2012b). The intent of this requirement is to ensure that the water quality of the waterbody is protected during times when it is most vulnerable. The biological monitoring data used to determine the reference watersheds reflect the impacts of stressors (i.e., sediment impacts to stream biota) over the course of time and therefore depict an average stream condition (i.e., captures all high and low flow events). Since the TMDL endpoint is based on the median of forest normalized loads from watersheds assessed as having good biological conditions (i.e., passing Maryland's biocriteria), by the nature of the biological data described above, it must inherently include the critical conditions of the reference

PUBLIC REVIEW DRAFT

watersheds. Therefore, since the TMDL reduces the watershed sediment load to a level compatible with that of the reference watersheds, critical conditions are inherently addressed.

Seasonality is captured in two components. First, it is implicitly included through the use of the biological monitoring data as biological monitoring data reflect the impacts of stressors over time, as described above. Second, the MBSS dataset included benthic sampling in the spring (March 1 - April 30) and fish sampling in the summer (June 1 - September 30). Benthic sampling in the spring allows for the most accurate assessment of the benthic population, and therefore provides an excellent means of assessing the anthropogenic effects of sediment impacts on the benthic community. Fish sampling is conducted in the summer when low flow conditions significantly limit the physical habitat of the fish community, and it is therefore most reflective of the effects of anthropogenic stressors as well.

4.5 TMDL Loading Caps

This section presents the Lower Gunpowder Falls watershed average annual sediment TMDL. This load is considered the maximum allowable long-term average annual load the watershed can sustain and support aquatic life.

The long-term average annual TMDL was calculated for the Lower Gunpowder Falls watershed based on Equation 4.2 and set at a load 3.6 times the all forested condition of the watershed. In order to attain the TMDL loading cap calculated for the watershed, constant reductions were applied to the predominant controllable sources (i.e., significant contributors of sediment to the stream system), independent of jurisdiction. It is worth noting that sediment reductions are also required in the Lower Gunpowder Falls watershed to meet the sediment allocations assigned to the Chesapeake Bay Tidal Fresh Gunpowder Oligohaline Water Quality Segment by the Chesapeake Bay TMDL, established by the USEPA on December 29, 2010. To ensure consistency with the Bay TMDL, and therefore efficiency in the reduction of sediment loads, reductions will be applied to the same controllable sources identified in Maryland's Watershed Implementation Plans (WIPs) for the Bay TMDL. The controllable sources include: (1) regulated developed land; (2) conventional till crops, conservation till crops, hay, and pasture; (3) harvested forest; (4) unregulated animal feeding operations and concentrated animal feeding operations (CAFOs); and (5) industrial process sources and municipal wastewater treatment plants. Additional sources might need to be controlled in order to ensure that the water quality standards are attained in Chesapeake Bay as well as Lower Gunpowder Falls.

In accordance with the conclusions drawn in Sections 2.4, 3.0, and 4.2, it has been determined that sediments are only impairing aquatic life in the 1st through 4th order tributary streams within the Lower Gunpowder Falls watershed. It has been determined that sediment is not impairing the aquatic life in the watershed's mainstem.

PUBLIC REVIEW DRAFT

The Lower Gunpowder Falls Baseline Load and TMDL are presented in Table 8.

Table 8: Lower Gunpowder Falls Baseline Load and TMDL

Baseline Load (ton/yr)	TMDL (ton/yr)	Total Reduction (%)
6,916	3,696	46

4.6 Load Allocations Between Point and Nonpoint Sources

Per USEPA regulation, all TMDLs need to be presented as a sum of Wasteload Allocations (WLAs) for point sources and Load Allocations (LAs) for nonpoint source loads generated within the assessment unit, as accounting for natural background, tributary, and adjacent segment loads (CFR 2012a). The State reserves the right to allocate the TMDL among different sources in any manner that protects aquatic life from sediment related impacts.

Equal reductions were applied to the sediment loads from controllable sources. Controllable loads were determined, in accordance with the Chesapeake Bay TMDL (USEPA 2010a), as the difference between the CBP 2010 “No Action” Scenario and the “E3” Scenario, where the No Action Scenario represents current land-uses and point sources without any nutrients controls applied, while the E3 Scenario represents application of all possible BMPs and control technologies to current land-uses and point sources. This allocation methodology provides credit for existing BMPs in place, which is one of the reasons the resulting reductions vary among source sectors.

In this watershed; cropland, pasture, nurseries, urban land, CAFOs, and municipal WWTPs were identified as the predominant controllable sources. Forest is the primary non-controllable source, as it represents the most natural condition in the watershed. Urban stormwater sediment loads are regulated under the NPDES municipal separate storm sewer system (MS4) program and therefore included in the WLA. No reductions were applied to permitted process water load sources, since such controls would produce no discernible water quality benefit when nonpoint sources and regulated stormwater sources comprise greater than 99% of the total watershed sediment load. Additionally, MS4 systems are controlled by stringent permit requirements designed to improve water quality parameters, including sediment.

Table 9 summarizes the TMDL results derived by applying equal percent reductions to the predominant controllable sediment sources. The TMDL results in an overall reduction of 46%.

Table 9: Lower Gunpowder Falls TMDL Reductions by Source Category

	Baseline Load Source Categories		Baseline Load (ton/yr)	TMDL Components	TMDL (ton/yr)	Reduction (%)
Lower Gunpowder Falls Watershed Contribution	Nonpoint Source		2,589	LA	1,832	29
	Point Source	Urban Stormwater	4,319	WLA	1,856	57
		Process Water	8		8	0
Total			6,916		3,696	46

Load Allocation

The LA for the Lower Gunpowder Falls watershed is expressed as one aggregate value for all nonpoint sources. Nonpoint source loads are estimated using the CBP P5.3.2 2009 Progress Scenario. For more detailed information regarding the Lower Gunpowder Falls watershed TMDL nonpoint source LA, please see the technical memorandum to this document entitled “*Significant Sediment Nonpoint Sources in the Lower Gunpowder Falls Watershed.*”

Wasteload Allocation

The WLA of the Lower Gunpowder Falls watershed is allocated to two permitted source categories, Process Water WLA and Stormwater WLA. The categories are described below.

Process Water WLA

Process Water permits with specific TSS limits and corresponding flow information are assigned to the WLA. In this case, detailed information is available to accurately estimate the WLA. If specific TSS limits are not explicitly stated in the process water permit, then TSS loads are expected to be *de minimis*. If loads are *de minimis* and they pose little or no risk to the aquatic environment and they are not a significant source.

Process Water permits with specific TSS limits include:

- Individual industrial facilities
- Individual municipal facilities
- General mineral mining facilities

There are four individual municipal process water sources with explicit TSS limits in the Lower Gunpowder Falls watershed that contributes to the watershed sediment load.

PUBLIC REVIEW DRAFT

There are no individual industrial or general mining facilities in the watershed. The total estimated TSS load from these sources is based on current, average permit limits and is equal to 8 ton/yr. As mentioned above, no reductions were applied to these sources, since such controls would produce no discernible water quality benefit when nonpoint sources and regulated stormwater sources comprise greater than 99% of the total watershed sediment load. For a detailed list of the process water permits including information on their permit limits and their allocations, please see the technical memorandum entitled “*Significant Sediment Point Sources in the Lower Gunpowder Falls Watershed.*”

Stormwater WLA

Per USEPA requirements, “stormwater discharges that are regulated under Phase I or Phase II of the NPDES stormwater program are point sources that must be included in the WLA portion of a TMDL” (USEPA 2002). Phase I and II permits can include the following types of discharges:

- Small, medium, and large municipal separate storm sewer systems (MS4s) – these can be owned by local jurisdictions, municipalities, and state and federal entities (e.g., departments of transportation, hospitals, military bases),
- Industrial facilities permitted for stormwater discharges, and
- Small and large construction sites.

USEPA recognizes that available data and information are usually not detailed enough to determine WLAs for NPDES regulated stormwater discharges on an outfall-specific basis (USEPA 2002). Therefore, NPDES regulated stormwater loads within the Lower Gunpowder Falls watershed TMDL will be expressed as an aggregate NPDES Stormwater WLA. Upon approval of the TMDL, “NPDES-regulated municipal stormwater and small construction storm water discharges effluent limits should be expressed as BMPs or other similar requirements, rather than as numeric effluent limits” (USEPA 2002).

The Lower Gunpowder Falls NPDES Stormwater WLA is based on reductions applied to the sediment load from the portion of the urban land-use in the watershed associated with the applicable NPDES regulated stormwater permits. The WLA may include legacy or other sediment sources. Some of these sources may also be subject to controls from other management programs. The Lower Gunpowder Falls NPDES Stormwater WLA requires an overall reduction of 57% (see Table 9).

As stormwater assessment and/or other program monitoring efforts result in a more refined source assessment, MDE reserves the right to revise the current NPDES Stormwater WLA provided the revisions protect aquatic life from sediment related impacts.

PUBLIC REVIEW DRAFT

For more information on the methods used to calculate the NPDES regulated stormwater baseline sediment load, see Section 2.2.2. For a detailed list of all of the NPDES regulated stormwater discharges within the watershed and information regarding the NPDES stormwater WLA distribution amongst these discharges, please see the technical memorandum to this document entitled “*Significant Sediment Point Sources in the Lower Gunpowder Falls Watershed.*”

4.7 Margin of Safety

All TMDLs must include a margin of safety (MOS) to account for any lack of knowledge and uncertainty concerning the relationship between loads and water quality (CFR 2012b). The MOS shall also account for any rounding errors generated in the various calculations used in the development of the TMDL. It is proposed that the estimated variability around the reference watershed group used in this analysis already accounts for such uncertainty. Analysis of the reference group *forest normalized sediment loads* indicates that the 75th percentile of the reference watersheds is a value of 7.2 and that the median value 3.6. Achieving a 75th percentile forest normalized sediment load would assure that the watershed falls within the range of unimpaired watersheds. However, for this analysis, the *forest normalized reference sediment load* (also referred to as the *sediment loading threshold*) was set at the median value of 3.6 (Currey et al. 2006). Use of the median as the threshold creates an environmentally conservative estimate, and results in an implicit MOS.

4.8 Summary of Total Maximum Daily Loads

The average annual non-tidal Lower Gunpowder Falls watershed TMDL is summarized in Table 10. The TMDL is the sum of the LA, NPDES Stormwater WLA, Process Water WLA, and MOS. The attainment of water quality standards within the non-tidal Lower Gunpowder Falls watershed can only be achieved by meeting the average annual TMDL of sediment/TSS specified for the watershed within this report. The Maximum Daily Load (MDL) is summarized in Table 11 (See Appendix B for more details).

Table 10: Lower Gunpowder Falls Watershed Average Annual TMDL of Sediment/TSS (ton/yr)

TMDL (ton/yr)	=	LA _{LGF}	+	NPDES Stormwater WLA _{LGF}	+	Process Water WLA _{LGF}	+	MOS
3,696	=	1,832	+	1,856	+	8	+	Implicit

PUBLIC REVIEW DRAFT

Table 11: Lower Gunpowder Falls Maximum Daily Load of Sediment/TSS (ton/day)

MDL (ton/day)	=	LA_{LGF}	+	NPDES Stormwater WLA_{LGF}	+	Process Water WLA_{LGF}	+	MOS
24.7	=	12.2	+	12.4	+	0.05	+	Implicit

PUBLIC REVIEW DRAFT

5.0 ASSURANCE OF IMPLEMENTATION

Section 303(d) of the CWA and current USEPA regulations require reasonable assurance that the sediment TMDL can and will be implemented (CFR 2012b). This section provides the basis for reasonable assurance that the sediment TMDL in the Lower Gunpowder Falls watershed will be achieved and maintained.

Chesapeake Bay TMDL

The Lower Gunpowder Falls Sediment TMDL is expected to be implemented as part of a staged process in conjunction with the Chesapeake Bay TMDL. This staged process is designed to achieve both the sediment reductions needed within the Lower Gunpowder Falls watershed and to meet sediment target loads consistent with the Chesapeake Bay TMDL, established by USEPA in 2010 (USEPA 2010a) and scheduled for full implementation by 2025.

The proposed approach for achieving the Lower Gunpowder Falls watershed reduction targets will be based on an appropriate selection of the comprehensive implementation strategies described in Maryland's [Phase I WIP](#) (MDE 2010) and [Phase II WIP](#) (MDE 2012b), the centerpieces of the State's "reasonable assurance" of implementation for the Bay TMDL. The strategies encompass a host of BMPs, pollution controls and other actions for all source sectors that cumulatively will result in meeting the State's 2017 interim nutrient and sediment reduction targets, as verified by the Chesapeake Bay Water Quality Model.

Once the Bay TMDL sediment target loads for the Gunpowder Oligohaline segment-shed have been met, MDE will revisit the status of sediment impacts on aquatic life in the non-tidal waters of the Lower Gunpowder Falls watershed, based on monitoring data that will be collected in the watershed. The primary dataset that will be used to reevaluate the status of sediment impacts on aquatic life will be MDDNR-MBSS biological monitoring data, which is applied within the BSID analysis for the watershed to determine whether or not sediments are impacting aquatic life. The same parameters used to identify sediment related impacts to aquatic life within the BSID will be reassessed. The results of this reassessment will determine whether additional sediment reductions are needed in the watershed, or whether the sediment TMDL goals for the Lower Gunpowder Falls watershed have in fact been met.

MS4 Permit Implementation Plans

MDE published the Final Determination to Issue Stormwater Permit to Baltimore County in December 2013. The permit states, "*By regulation at 40 CFR §122.44, BMPs and programs implemented pursuant to this permit must be consistent with applicable WLAs developed under [US]EPA approved TMDLs.*"

Section IV.E. of the permit details requirements for *Restoration Plans and Total Maximum Daily Loads*. Within one year of permit issuance, the County is required to submit an implementation plan for each stormwater WLA approved by USEPA prior to

PUBLIC REVIEW DRAFT

the effective date of the permit. For TMDLs approved after the permit, implementation plans are due within one year of USEPA approval of the TMDL. Implementation plans should include the following: a detailed implementation schedule, the final date for meeting applicable WLAs, a detailed cost estimate for all elements of the plan, a system that evaluates and tracks implementation through monitoring or modeling to document progress towards meeting established benchmarks, deadlines, and stormwater WLAs, and a public participation program. An annual TMDL assessment report shall also be submitted to MDE.

Sediment from urban areas can be reduced by the stormwater retrofits required in the MS4 permit. The retrofits can address both water quality and quantity. Examples of these retrofits include the reduction of impervious surfaces, modification of existing or installation of new stormwater structural practices, increased street sweeping and inlet cleaning, increased urban tree canopy, and stream restoration projects. Stormwater retrofit reductions range from as low as 10% for dry detention to approximately 80% for wet ponds, wetlands, infiltration practices, and filtering practices (USEPA 2003b). BMP specific reduction efficiencies are estimated by CBP, and best professional judgment. MDE estimates that future stormwater retrofits will have approximately a 65% reduction efficiency for TSS.

For more information on the MS4 permits, please see [Maryland's NPDES Municipal Separate Storm Sewer System \(MS4\) Permits](#).

Implementation of Agricultural Best Management Practices

In agricultural areas comprehensive soil conservation plans can be developed that meet criteria of the USDA-NRCS Field Office Technical Guide (USDA 1983). Soil conservation plans help control erosion by modifying cultural practices or structural practices. The reduction percentage attributed to cultural practices is determined based on changes in land-use, while structural practices have a reduction percentage of up to 25%. In addition, livestock can be controlled via stream fencing and rotational grazing. Sediment reduction efficiencies of methods applicable to pasture land-use range from 40% to 75% (USEPA 2004). Lastly, riparian buffers can reduce the effect of agricultural sediment sources through trapping and filtering, and reforestation, whether adjacent to part of the watershed stream system or in a watershed's interior, can decrease agricultural sediment sources as well.

PUBLIC REVIEW DRAFT

Maryland Funding Programs

In response to the WIP and the increased responsibility for local governments to achieve nutrient and sediment reduction goals, Maryland has continued to increase funding in the Chesapeake and Atlantic Coastal Bays Trust Fund. According to the Section 40 Report, even though the annual restoration funds for the four agencies (DNR,MDA,MDE,MDP) varies from year to year, the total restoration funds for the first three years of the Chesapeake Bay WIP implementation evaluated time period (FY00 – FY02) was \$882,327,165, while the total for the past four years of the period (FY12 – FY15) was \$2,383,507,560, an increase of 170 percent. This increase was driven in part by the two primary Bay restoration Special Funds: The Bay Restoration Fund (MDE) and the Chesapeake and Atlantic Coastal Bays Trust Fund (DNR) (MDE et al, 2016). For more information on Maryland's implementation and funding strategies to achieve nutrient and sediment reductions throughout the State's portion of the Chesapeake Bay watershed, please see [Maryland's Phase II Watershed Implementation Plan](#).

Some other examples of programs that can provide funding for local governments and agricultural sources include the Federal Nonpoint Source Management Program (§ 319 of the Clean Water Act), Buffer Incentive Program (BIP), State Water Quality Revolving Loan Fund, Bay Restoration Fund, Chesapeake Bay Trust Fund and the Maryland Agricultural Water Quality Cost-Share Program. Details of these programs and additional funding sources can be found at <http://www.dnr.state.md.us/bay/services/summaries.html>.

In summary, through the use of the aforementioned funding mechanisms and BMPs, there is reasonable assurance that this TMDL can be implemented.

Additional Biological Stressors

As has been stated previously in this report, the biological impairment in this watershed is due to multiple stressors, not just sediment. While reducing TSS might bring about a water quality impact in terms of clarity, achieving a positive impact in stream biological communities might require several stressors to be addressed. These stressors were described in the Lower Gunpowder BSID report.

The BSID identified chlorides and sulfates as chemical stressors significantly associated with degraded biological conditions in this watershed. These were listed as impairments on Category 5 of the 2012 Integrated Report, and will require TMDLs. Furthermore, the BSID identified "anthropogenic channelization" as another likely cause of degraded biological communities. Based on the report's recommendation, channelization in this watershed was included on the listing of impaired waters as Category 4c, a list that covers water body impairments that are not caused by a pollutant.

The report also details specific substressors within the larger sediment stressor class that are associated with biological degradation. These include extensive bar formation, channel alteration and poor epifaunal substrate. Within the in-stream habitat stressor

PUBLIC REVIEW DRAFT

class, the report identifies channelization, in-stream habitat structure, riffle/run quality and the presence of concrete and gabions as stressors.

Many of the implementation actions to address sediment could concurrently address the other stressors identified in the BSID report. For example, a stream restoration project that reduces sediment loads in a stream might also remove a significant amount of channelization. Since biological improvements will likely only be seen when multiple structural and pollutant stressors are addressed, watershed managers developing plans to address sediment should consider the effect of restoration projects on other stressors. Where possible, preference should be given to designs that address multiple stressors.

PUBLIC REVIEW DRAFT

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APPENDIX A – Watershed Characterization Data

Table A-1: Reference Watersheds

MD 8-Name	MD 8-digit	Percent Stream Mile BIBI/FIBI < 3.0 (%) ^{1,2}	Forest Normalized Sediment Load ³
Big Elk Creek	02130606	12.5	7.8
Brighton Dam	02131108	10.0	3.0
Broad Creek	02120205	10.5	3.4
Deer Creek	02120202	10.2	3.6
Fifteen Mile Creek	02140511	6.7	1.7
Furnace Bay	02130609	10	6.6
Little Gunpowder Falls	02130804	13.3	3.8
Middle Patuxent River	02131106	18.8	2.5
Northeast River	02130608	15.7	9.2
Octoraro Creek	02120203	7.7	8.3
Savage River	02141006	4.9	2.7
Median			3.6
75th percentile			7.2

- Notes:**
- ¹ Based on the percentage of MBSS stations with BIBI and/or FIBI scores significantly lower than 3.0 within the watershed (MDE 2012a).
 - ² The percent stream miles with BIBI and/or FIBI scores significantly lower than 3.0 threshold to determine if an 8-digit watershed is impaired for impacts to biological communities is based on a comparison to reference conditions (MDE 2008).
 - ³ Forest normalized sediment loads based on Maryland watershed area only (consistent with MBSS random monitoring data).

PUBLIC REVIEW DRAFT

APPENDIX B – Technical Approach Used to Generate Maximum Daily Loads

Summary

This appendix documents the technical approach used to define maximum daily loads (MDLs) of sediment consistent with the average annual TMDL in the Lower Gunpowder Falls watershed, which is considered the maximum allowable load the watershed can sustain and support aquatic life. The approach builds upon the modeling analysis that was conducted to determine the sediment loadings and can be summarized as follows.

- The approach defines MDLs for each of the source categories.
- The approach builds upon the TMDL modeling analysis that was conducted to ensure that average annual loading targets are at a level that support aquatic life.
- The approach converts daily time-series loadings into TMDL values in a manner that is consistent with available USEPA guidance on generating daily loads for TMDLs (USEPA 2007).
- The approach considers a daily load level of a resolution based on the specific data that exists for each source category.

Introduction

This appendix documents the development and application of the approach used to define MDL values. It is divided into sections discussing:

- Basis for approach
- Options considered
- Selected approach
- Results of approach

Basis for approach

The overall approach for the development of daily loads was based upon the following factors:

- **Average Annual TMDL:** The basis of the average annual sediment TMDL is that cumulative high sediment loading rates have negative impacts on the biological community. Thus, the average annual sediment load was calculated so as to ensure the support of aquatic life.
- **CBP P5.3.2 Watershed Model Sediment Loads:** As described in Section 2.2, the nonpoint source sediment loads from the Lower Gunpowder Falls watershed are based on EOS loads from the CBP P5.3.2 watershed model. The CBP P5.3.2 model river segments were calibrated to daily monitoring information for

PUBLIC REVIEW DRAFT

watersheds with a flow greater than 100 cubic feet per second (cfs), or an approximate area of 100 square miles.

- **Draft USEPA guidance document entitled “Developing Daily Loads for Load-based TMDLs”:** This guidance document provides options for defining MDLs when using TMDL approaches that generate daily output (USEPA 2007).

The rationale for developing TMDLs expressed as *daily* loads was to accept the existing average annual TMDL, but then develop a method for converting this number to a MDL in a manner consistent with USEPA guidance and available information.

Options considered

The draft USEPA guidance document for developing daily loads does not specify a single approach that must be adhered to, but rather it contains a range of acceptable options (USEPA 2007). The selection of a specific method for translating a time-series of allowable loads into the expression of a TMDL requires decisions regarding both the level of resolution (e.g., single daily load for all conditions vs. loads that vary with environmental conditions) and level of probability associated with the TMDL.

This section describes the range of options that were considered when developing methods to calculate Lower Gunpowder Falls watershed MDLs.

Level of Resolution

The level of resolution pertains to the amount of detail used in specifying the MDL. The draft USEPA guidance document on daily loads provides three categories of options for level of resolution, all of which are potentially applicable for the Lower Gunpowder Falls watershed:

1. **Representative daily load:** In this option, a single daily load (or multiple representative daily loads) is specified that covers all time periods and environmental conditions.
2. **Variable daily load:** This option allows the MDL to vary as function of a particular characteristic that affects loading or waterbody response, such as flow or season.

Probability Level

All TMDLs have some probability of being exceeded, with the specific probability being either explicitly specified or implicitly assumed. This level of probability directly or indirectly reflects two separate phenomena:

1. Water quality criteria consist of components describing acceptable magnitude, duration, and frequency. The frequency component addresses how often conditions can allowably surpass the combined magnitude and duration components.
2. Pollutant loads, especially from wet weather sources, typically exhibit a large degree of variability over time. It is rarely practical to specify a “never to be

PUBLIC REVIEW DRAFT

exceeded value” for a daily load, as essentially any loading value has some finite probability of being exceeded.

The draft daily load guidance document states that the probability component of the MDL should be based on a representative statistical measure that is dependent upon the specific TMDL and the best professional judgment of the developers (USEPA 2007). This statistical measure represents how often the MDL is expected/allowed to be exceeded. The primary options for selecting this level of protection would be:

1. **The maximum daily load reflects some central tendency:** In this option, the MDL is based upon the mean or median value of the range of loads expected to occur. The variability in the actual loads is not addressed.
2. **The maximum daily load is a value that will be exceeded with a pre-defined probability:** In this option, a “reasonable” upper bound percentile is selected for the MDL based upon a characterization of the variability of daily loads. For example, selection of the 95th percentile value would result in a MDL that would be exceeded 5% of the time.
3. **The maximum daily load reflects a level of protection implicitly provided by the selection of some “critical” period:** In this option, the MDL is based upon the allowable load that is predicted to occur during some critical period examined during the analysis. The developer does not explicitly specify the probability of occurrence.

Selected Approach

The approach selected for defining a Lower Gunpowder Falls MDL was based upon the specific data that exists for each source category. The approach consists of unique methods for each of the following categories of sources:

- Approach for Nonpoint Sources and Stormwater Point Sources within the Lower Gunpowder Falls watershed
- Approach for Process Water Point Sources within the Lower Gunpowder Falls watershed

PUBLIC REVIEW DRAFT

Approach for Nonpoint Sources and Stormwater Point Sources within the Lower Gunpowder Falls Watershed

The level of resolution selected for the Lower Gunpowder Falls MDL was a representative daily load, expressed as a single daily load for each loading source. This approach was chosen based upon the specific data that exists for nonpoint sources and stormwater point sources within the Lower Gunpowder Falls watershed. Currently, the best available data is the CBP P5.3.2 model daily time series calibrated to long-term average annual loads (per land-use). The CBP reach simulation results are calibrated to daily monitoring information for watershed segments with a flow typically greater than 100 cfs.

The probability level selected for the Lower Gunpowder Falls MDL was a pre-defined exceedance probability. Based on the USEPA guidance, “in the case where a long term daily load dataset is available, in which multiple years of data and a variety of environmental conditions are represented, it is preferable to select a maximum daily load as a percentile of the load distribution. A sufficiently long-term dataset allows for minimizing error associated with the fact that the daily load dataset might not exactly match a normal or lognormal distribution” (USEPA 2007). The exact percentile value to be used should be determined by the TMDL developer, based on site specific characteristics.

This CBP P5.3.2 model output provides a time series of daily TSS loads from the Lower Gunpowder Falls watershed, covering a 20-year period from 1985 to 2005. Because this is a long-term time series, it captures a broad range of meteorological and hydrological conditions and also minimizes the effect of potential statistical variances. As with the calculation of the TMDL value, environmentally conservative principles are also used in the MDL calculation. A 95th percentile flow was selected for the MDL, meaning that there is a 5% probability that daily loads will exceed this value. This percentile was chosen rather the 99th (which is also considered acceptable based on USEPA), in order to avoid the influence of extreme weather events and statistical outliers. Since the model daily time series represents the current (baseline) condition, the reduction percentage applied to each sector of the TMDL, was applied directly to the 95th percentile values to calculate the final MDL value.

$$MDL = 95th \text{ percentile of daily load series values} * \text{Reduction \% from TMDL}$$

(Eq B-1)

Where:

MDL = Maximum Daily Load, ton/day

Daily load series values = CBP 5.3.2 output

TMDL = Long term average annual load, ton/yr

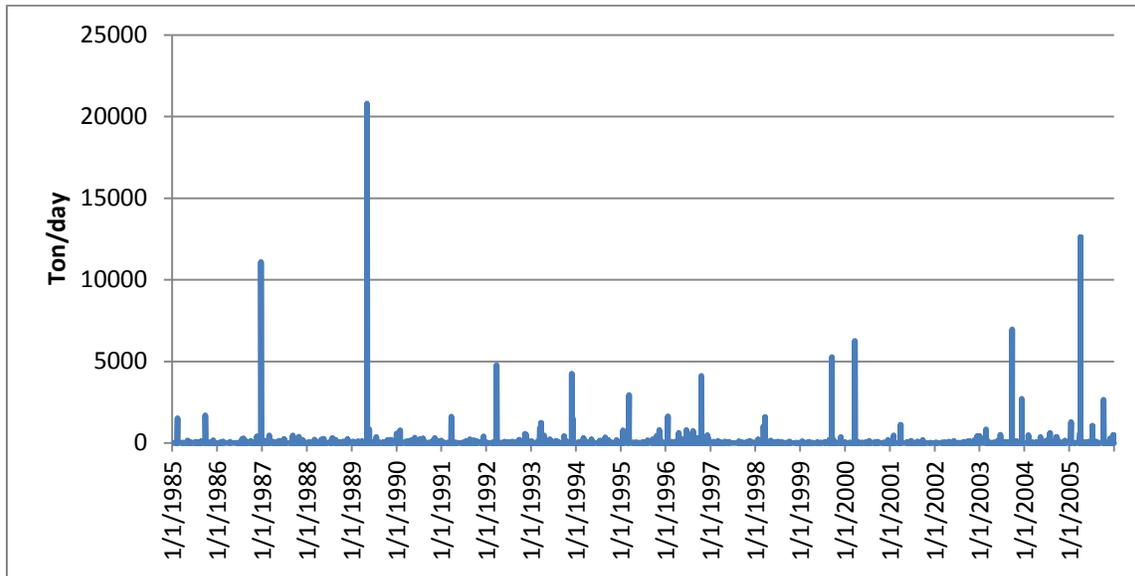


Figure B-1: Daily Time Series of CBP River Segment Daily Simulation Results for the Lower Gunpowder Falls Watershed

Approach for Process Water Point Sources within the Lower Gunpowder Falls Watershed

The TMDL also considers contributions from other point sources (i.e., sources other than stormwater point sources) in the watershed that have NPDES permits with sediment limits. As these sources are generally minor contributors to the overall sediment load, the TMDL analysis that defined the average annual TMDL did not propose any reductions for these sources and held each of them constant at their existing technology-based NPDES permit monthly (or daily if monthly was not specified) limit for the entire year.

The approach used to determine MDLs for these sources was dependent upon whether a maximum daily limit was specified within the permit. If a maximum daily limit was specified, then the reported average flow was multiplied by the daily maximum limit and a conversion factor of 0.0042 to obtain an MDL in ton/day. If a maximum daily limit was not specified, the MDLs were calculated based on the guidance provided in the Technical Support Document (TSD) for Water Quality-based Toxics Control (USEPA 1991). The long-term average annual TMDL was converted to maximum daily limits using Table 5-2 of the TSD assuming a coefficient of variation of 0.6 and a 99th percentile probability. This results in a dimensionless multiplication factor of 3.11. The average annual Lower Gunpowder Falls TMDL of sediment/TSS is reported in ton/yr, and the conversion from ton/yr to a MDL in ton/day is 0.0085 (e.g. 3.11/365).

PUBLIC REVIEW DRAFT

Results of approach

This section lists the results of the selected approach to define the Lower Gunpowder Falls MDLs. The final results are presented in Table B-1.

- Calculation Approach for Nonpoint Sources and Stormwater Point Sources within the Lower Gunpowder Falls Watershed

The MDL for Nonpoint Sources and Stormwater Point Sources within the Lower Gunpowder Falls Watershed is based upon the 95th percentile value of the CBP P5.3.2 model daily load time series, reduced by the same percentage as the corresponding TMDL value. The 95th percentile load of the daily times series is 45.7 lbs/day and with a TMDL reduction of 46%, it results in a total watershed MDL of 24.7 tons/day. The total MDL is subdivided in accordance with the same ratios present in the TMDL.

- Calculation Approach for Process Water Point Sources within the Lower Gunpowder Falls Watershed

- For permits with a daily maximum limit:

Process Water WLA_{LGF} (ton/day) = Permit flow (millions of gallons per day (MGD)) * Daily maximum permit limit (milligrams per liter (mg/l)) * 0.0042, where 0.0042 is a combined factor required to convert units to ton/day

- For permits without a daily maximum limit:

Process Water WLA_{LGF} (ton/day) = Average Annual TMDL Process Water WLA_{LGF} Other (ton/yr) * 0.0085, where 0.0085 is the factor required to convert units to ton/day

The aggregate MDL for the four point sources in the watershed is 0.04 tons/day.

Table B-1: Lower Gunpowder Falls Maximum Daily Loads of Sediment/TSS (ton/day)

MDL (ton/day)	=	LA_{LGF}	+	NPDES Stormwater WLA_{LGF}	+	Process Water WLA_{LGF}	+	MOS
24.7	=	12.2	+	12.4	+	0.05	+	Implicit