Nitrogen Source Identification Report for the Long Island Sound

For compliance with the National Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems in Massachusetts

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Introduction

This Nitrogen Source Identification Report (NSIR) was developed in accordance with the 2016 National Pollutant Discharge Elimination System General Permit for Stormwater Discharges from Small Municipal Separate Storm Sewer Systems in Massachusetts (MS4 Permit), Appendix F, Part B.I.1.b. This NSIR addresses regulated property owned and/or operated by the Massachusetts Department of Conservation and Recreation (DCR) that discharges to the Long Island Sound. DCR owns and operates property across Massachusetts, some of which generates MS4 regulated stormwater discharges. The purpose of this report is to identify discharges that are contributing to the Long Island Sound watershed and to devise an effective approach for reducing this contribution.

The methods used to develop this NSIR are explained in depth in a document entitled "Methods for Nitrogen Control Plan & Nutrient Source Identification Report Development," referred to here as the DCR PCP & NSIR Methods. This document, which will be submitted separately to the Environmental Protection Agency (EPA), includes methods for determining which portions of DCR facilities which are regulated, delineating drainage catchments within facilities, calculating pollutant loading, prioritizing catchments for treatment, crediting stormwater control measures, and determining appropriate organization of impaired waterbody segments for inclusion in this report.

Results of this NSIR are presented in the DCR NSIR & PSIR Web Application, which can be found at the following link:
https://vhb.maps.arcgis.com/apps/dashboards/4cfdc963fe0442aba6e91c69c05064ac#mode=view

For reference, Appendix A includes metadata for each layer presented in the web application.

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Waterbodies Subject to NSIR Requirements

The Long Island Sound has an approved out of state Total Maximum Daily Load.[1] Therefore, under Appendix F of the MS4 Permit, DCR is required to develop an NSIR to address nitrogen load in stormwater discharges from DCR's MS4 to this waterbody. The DCR NSIR & PSIR Web Application displays nutrient impaired waterbodies, their watersheds, and the MS4-regulated DCR facilities within the watersheds.

Table 1 Waterbodies Included in this NSIR

Waterbody Name
Long Island Sound

1 New York State Department of Environmental Conservation and Connecticut Department of Environmental Protection. 2000. *A Total Maximum Daily Load Analysis to Achieve Water Quality Standards for Dissolved Oxygen in Long Island Sound*. https://longislandsoundstudy.net/wp-content/uploads/2010/03/Tmdl.pdf

3

Regulated MS4 Area

(Meets Appendix F. Part B.I.1.b.i.1 & Part B.I.1.b.i.3)

Table 2 presents the total MS4-regulated area within the watershed, including the estimated impervious area, directly connected impervious area (DCIA), and pervious area. The DCR PCP & NSIR Methods contains methodology for determining DCR's MS4-regulated area and for calculating total impervious area and DCIA.

Table 2 Regulated MS4 Area

Type of Regulated Area	Area (acres)
Impervious Area	29
Directly Connected Impervious Area	14
Pervious Area	55
Total Regulated Area	**84**

*Note: Areas above do not sum to equal total regulated area as DCIA is a subset of IA

Catchments were delineated within MS4-regulated DCR property for the purposes of pollutant load and treatment calculations. The DCR PCP & NSIR Methods discusses catchment delineation, but briefly, catchments were delineated using 3-meter resolution contour data, DCR stormwater drainage infrastructure and the latest available aerial imagery. These catchments do not necessarily align with catchments delineated for illicit discharge detection and elimination (IDDE) purposes, which are catchments of individual outfalls. The DCR NSIR & PSIR Web Application displays each catchment's total impervious area and DCIA in the catchment layer pop-up.

4

Monitoring Results

(Meets Appendix F. Part B.I.1.b.i.2)

Results from dry and wet weather screening and sampling of DCR's outfalls and interconnections in this watershed are publicly available at the following URL as provided in the DCR MS4 Annual Report: https://vhb.maps.arcgis.com/apps/webappviewer/index.html?id=87a35a2683aa4478a07ade7ffb7c1b2a

Nitrogen concentrations measured during IDDE monitoring are from one-time grab samples and are not indicative of annual loads. Therefore, these results were not used when prioritizing catchments for load reduction. Outfalls that were found to have dry or wet weather flow with sewer input indicators will be addressed as part of DCR's MS4 IDDE program, adding to the nitrogen load reduction planned in this NSIR.

5

Load Reduction Planning

DCR takes many approaches to pollutant load reduction, including street sweeping, catch basin cleaning, leaf litter pick-up, good housekeeping at labor yards, proper fertilizer management, sediment and erosion control and other source control. The focus of the planning in this NSIR, however, is pollutant reduction through structural stormwater control measures.

5.1 Catchment Prioritization

(Meets Appendix F. Part B.I.1.b.i.4)

To prioritize DCR catchments with high nitrogen loading, a GIS analysis was first performed to estimate annual average nitrogen loading of each MS4-regulated catchment. This analysis accounted for land use, land cover, and soil type, and is described in more detail in the DCR PCP & NSIR Methods. Next, catchments of different sizes were compared using each catchment's nitrogen load per area. DCR developed a ranking system based on this metric, presented in Table 3, to ensure consistent identification of priority catchments across this watershed and all other PSIR watersheds. The development of this ranking system is discussed further in the DCR PCP & NSIR Methods.

Results of catchment prioritization are displayed in Table 3 and in the DCR NSIR & PSIR Web Application. Table 3 presents the count of catchments that fall within each priority level. The DCR NSIR & PSIR Web Application indicates each catchment's priority with a stop-light color scheme defined in Table 3, and displays each catchment's annual average nitrogen load per area in the catchment layer pop-up. DCR property not subject to the requirements of this NSIR is also displayed with gray hatch-marks. Appendix A contains metadata for the DCR NSIR & PSIR Web Application.

Table 3 Catchment Prioritization

Catchment Priority	Loading Rate (lb/ac/yr)	NSIR & PSIR Web Application Color	Count of Catchments
High Priority	>8.1	Red	10
Medium Priority	2.6 to 8.1	Orange	16
Low Priority	<2.6	Green	9

5.2 Potential Structural BMPs

(Meets Appendix F. Parts B.I.1.b.i.5, B.I.1.c.i & B.I.1.c.ii)

5.2.1 General Approach to BMP Planning

In Permit Year 5, the catchments prioritized above were further evaluated for stormwater treatment opportunities. DCR's general approach to planning structural control measures, or best management practices (BMPs), falls into two main categories: stand-alone stormwater retrofit projects and opportunistic incorporation of BMPs into planned site development or redevelopment projects. For stand-alone retrofits, DCR targets catchments that are determined to have high load, as these are areas where implementing stormwater treatment could result in the largest impact. Within these catchments, DCR prioritizes opportunities for impervious cover disconnection or removal, retrofits of existing BMPs, and construction of surface infiltration or filtration practices (infiltration being preferable). DCR also takes an opportunistic approach to stormwater retrofits and has developed the DCR Stormwater Handbook, which encourages designers to incorporate BMPs into all projects, even those that do not trigger the MS4 Permit's post-construction requirement threshold of one acre disturbed. DCR's approach for planning structural BMPs is further described in the DCR PCP & NSIR Methods.

5.2.2 Planned Structural BMPs

DCR's process for identifying potential standalone stormwater retrofits in this NSIR watershed began in Permit Year 4, when DCR evaluated catchments and assigned each a "treatment status." If catchments were MS4-regulated and not already treated by a BMP, they were given a treatment status based on their potential for treatment. This determination was based on a high-level evaluation of site characteristics, such as ability to collect drainage and available space for treatment, which primarily involved reviewing DCR's drainage geodatabase and aerial photographs of the site.

In Permit Year 5, DCR took all catchments that had been identified as having high potential for treatment and assessed those that had also been designated as High Priority (see Section 5.1) based on their nitrogen load per area. These high load, high potential catchments were then subjected to a systematic and detailed evaluation to determine 1) if there were any infrastructure, resurfacing, or redevelopment activities planned for the catchment and 2) the engineering and regulatory feasibility of retrofitting the catchment with BMPs. The DCR NSIR & PSIR Web Application shows the results of this evaluation. If a catchment was evaluated, its pop-up contains a "catchment considerations" form with nine attribute fields that guided the evaluation. The PCP & NSIR Methods discusses these nine attribute fields and the process for populating them.

In this NSIR watershed, four catchments were evaluated with a catchment considerations form. After evaluation, all of these catchments were included in this watershed's list of sites for planned structural BMPs. The BMP type and load reduction for these sites will be selected during design, but Section 5.2.1 provides more detail on DCR's general approach for BMP selection.

5.2.3 Implementation Schedule & Cost

DCR plans to construct at least one BMP in this NSIR watershed per permit term, and will select which planned BMPs get constructed based on which appear to be the most feasible according to the

catchment considerations form and further design evaluations. DCR will also implement BMPs opportunistically as redevelopment projects take place in the watershed.

The estimated cost of building one BMP in this watershed is estimated to be $50,000 to $100,000 per permit term if the BMP must be a stand-alone retrofit project. However, costs will be lower if the BMP can be incorporated into already planned development or redevelopment.

The MS4 Permit requires that the permittee plan and install a minimum of one structural BMP as a demonstration project within six years of the permit effective date. In this NSIR watershed, DCR has not installed any BMPs within the permit term. However, DCR has plans to make improvements to the Chicopee State Park Bathhouse in Permit Year 6, and the current design includes the installation of three BMPs (two bioretention basins and one water quality swale), which would meet and exceed the demonstration project requirement.

5.3 Nitrogen Removal by Existing Structural BMPs

(Meets Appendix F. Part B.I.1.c.iii)

DCR tracks BMPs in its drainage infrastructure geodatabase and currently has 11 DCR owned and/or maintained BMPs tracked in this NSIR watershed. However not all of these BMPs are considered "creditable" by the MS4 Permit, that is, the MS4 Permit does not contain methods to calculate nitrogen load reductions for these BMP types (e.g., water quality units, porous pavement with less than 12-inches of filter depth). Thus, at this time, DCR has six creditable BMPs in this watershed.

Nitrogen reduction of these creditable BMPs was estimated using methodology from the MS4 Permit's Appendix F Attachment 3 (as instructed in Appendix H). Methodology is further described in the DCR PCP & NSIR Methods, but includes delineating catchments as accurately as possible using desktop-level analysis, and conservatively assuming a 0.5-inch runoff depth over the contributing impervious area to calculate design storage volume for all BMPs because design storage volumes of most BMPs are not readily available.

The DCR PSIR & NSIR Web Application displays each identified BMP in this NSIR watershed. Pop-ups display each BMP's type, and if creditable, the estimated catchment area, assumed design storage volume, and nitrogen load reduction. All BMPs are shown in purple. Creditable BMPs also have a star. Note that as tracking and accounting of BMPs continues, and DCR identifies additional BMPs and/or refines data (e.g., catchment area, design storage volume, BMP type, etc.), estimates of load reduction may change.

A

DCR NSIR & PSIR Web Application Metadata

Table A1 below provides reference metadata for the DCR NSIR & PSIR Web Application accessible at the URL below.

https://vhb.maps.arcgis.com/apps/dashboards/4cfdc963fe0442aba6e91c69c05064ac#mode=view

Table A1 DCR NSIR & PSIR Web Application Metadata

Layer Name	Description	Source	Feature Class
Outlet	Outlets mapped in DCR's drainage geodatabase	DCR	Point
Inlet	Inlets (e.g., catch basins) mapped in DCR's drainage geodatabase	DCR	Point
Manhole	Manholes mapped in DCR's drainage geodatabase	DCR	Point
Miscellaneous Structure - Point	Miscellaneous structures mapped as a point in DCR's drainage geodatabase	DCR	Point
Miscellaneous Structure - Polygon	Miscellaneous structures mapped as a polygon in DCR's drainage geodatabase	DCR	Polygon
Linear Feature	Linear features, such as pipes and other conveyances, mapped in DCR's drainage geodatabase	DCR	Line
Surface BMP	Aboveground structural stormwater control measures (BMPs) mapped in DCR's drainage geodatabase. Surface BMPs are colored light purple. They have a star if they were assigned load reduction credit. Pop-ups show load reduction credit and several other parameters used to calculate credit.	DCR	Polygon
Subsurface BMP	Belowground structural stormwater control measures (BMPs) mapped in DCR's drainage geodatabase. Subsurface BMPs are colored dark purple. They have a star if they were assigned load reduction credit. Pop-ups show load reduction credit and several other parameters used to calculate credit.	DCR	Polygon

Catchment	Subdivides DCR property based on the catchments' "discharge priority," which is an attribute that provides information such as whether the property is subject to PSIR/NSIR requirements. Catchments with a discharge priority of high, medium, or low (colored in red, orange, and green, respectively) are subject to PSIR/NSIR requirements. These catchments are delineated based on gross drainage patterns and given a discharge priority designation based on their pollutant load per area (high being the highest load and thus highest priority for treatment, etc.). Catchments with a discharge priority of non-discharge, unregulated, or outside NSIR watershed (symbolized with diagonal, horizontal, and vertical gray hatched lines, respectively) are not subject to PSIR/NSIR requirements; the reason for which is indicated by the discharge priority. These areas are either outside the NSIR-requiring watershed (outside NSIR watershed), within an unregulated DCR facility (unregulated), or within a regulated DCR facility but do not discharge stormwater (non-discharge). Catchment layer pop-ups include several catchment characteristics, including catchment treatment status. Catchments can have a treatment status of "existing" if the catchment is treated by an existing, creditable BMP, "high potential" or "low potential" if the catchment is not treated by a BMP, or "non-discharge" if the catchment does not include any channelized discharge and is therefore not considered regulated under the MS4 Permit. Catchment pop-ups also show BMP structure ID if the catchment is treated by a creditable BMP.	DCR	Polygon
DCR NSIR Required Watersheds: Parent	Displays the watersheds of the most downstream waterbody segment of each NSIR report	DCR	Polygon
DCR NSIR Required Watersheds: Child	Displays the watersheds of each NSIR-requiring waterbody segment within the parent watersheds	DCR	Polygon
Nitrogen and/or Phosphorus Impaired Waterbodies: Rivers	"MassDEP 2016 Impaired Waters – Waterbody AUs – Rivers (arcs)" data layer filtered for only Total Phosphorus and Total Nitrogen impairments	MassDEP	Line
Nitrogen and/or Phosphorus Impaired Waterbodies: Lakes & Estuaries	"MassDEP 2016 Impaired Waters – Waterbody AUs – Lakes, Estuaries (polygons)" data layer filtered for only Total Phosphorus and Total Nitrogen impairments	MassDEP	Polygon