The Bacterial Pollution Control Plan (BPCP)

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The Up and Coming

- Broward County 3rd Term Permit Issuance (2011)

  1 Adopted Fecal TMDL

- Broward County 4th Term Permit Issuance (2016)

  11 Adopted Fecal TMDLs (so far)

In Summary…

- Part VIII.B.4 of the Phase I 3rd Term NPDES MS4 permit
- Established EPA and/or adopted FDEP fecal coliform TMDL at the issuance of your permit, you must submit a BPCP within 30 months (dependent on your prioritization plan).

BPCP Requirements

- Who is required to submit it?
- What is required to be submitted?
- Is this a requirement for me?
- How much time to I have to prepare and submit?

See Part VIII of your Phase I NPDES MS4 Permit

Per Permit, Elements of the BPCP

1. Identification of potential sources of bacteria discharged from the MS4 system.

2. Bacteria source tracking or other assessment techniques, including monitoring, to better refine the identification of bacterial sources to the MS4 system and prioritize them for implementation of activities to reduce fecal coliform loadings.

3. Adoption and implementation of a pet waste management ordinance or program.

4. Implementation of an educational program directed at reducing bacterial pollution.

5. Identification of additional structural or nonstructural BMPs or program activities needed to reduce bacterial loadings discharged from the MS4 into water bodies with an adopted fecal coliform TMDL to the MEP. This shall include a summary of BMPs and other activities to be implemented, the schedule for their implementation, and the anticipated load reductions from the implemented activities.

Goals of the BPCP & Associated Activities

- Facilitate coordination between stakeholders
- Better understand the basin
- Determine possible sources of fecal contamination
- Collaborate on efforts/projects to reduce fecal contamination

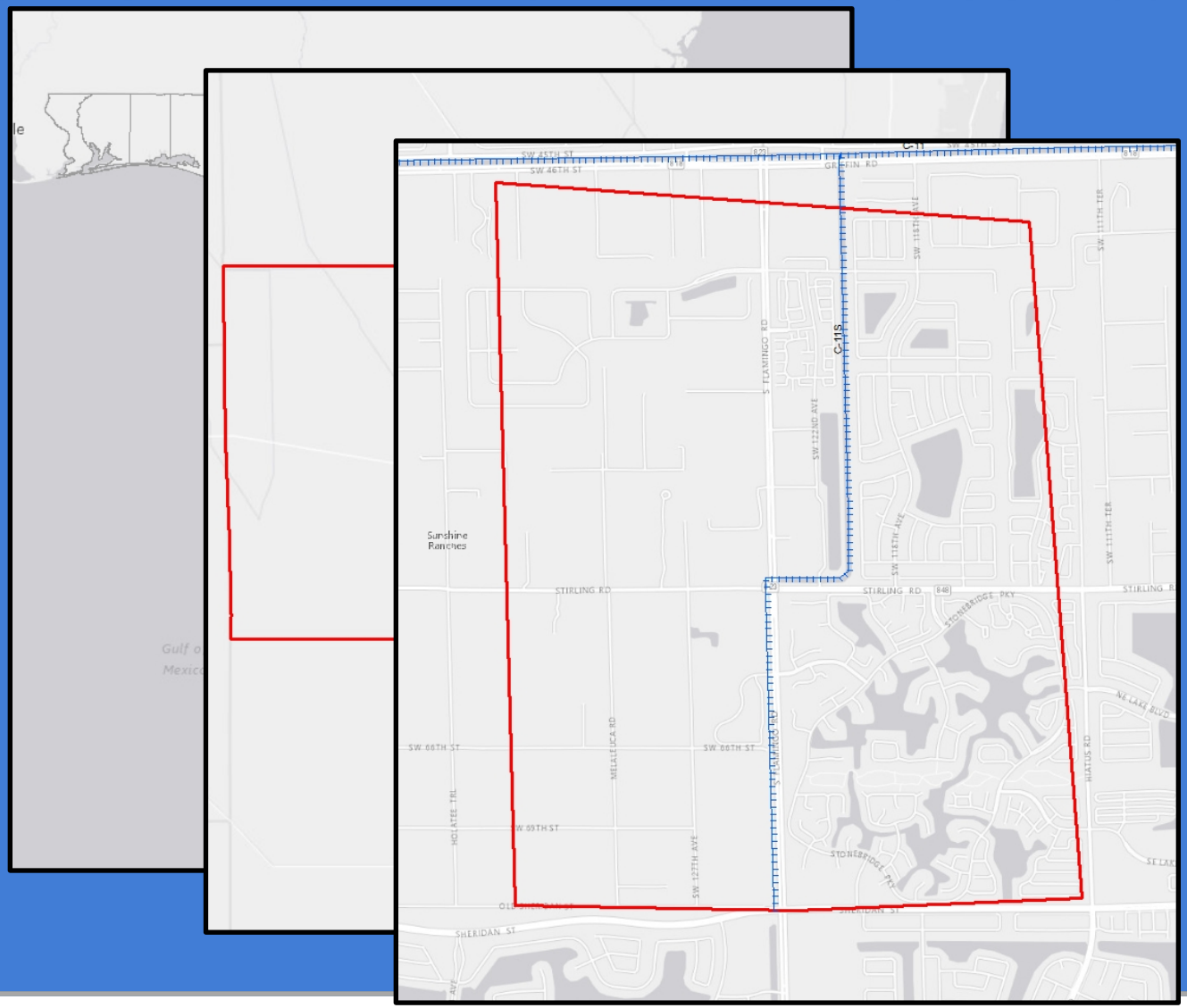
Preparation for Drafting BPCP

- Kick Off Meeting
- Maps on the Table
- Walk the WBID

WBID 3279A
North Fork Snake Creek Canal

A BPCP from Multiple Entity Perspectives

WBID 3279A: North Fork Snake Creek Canal



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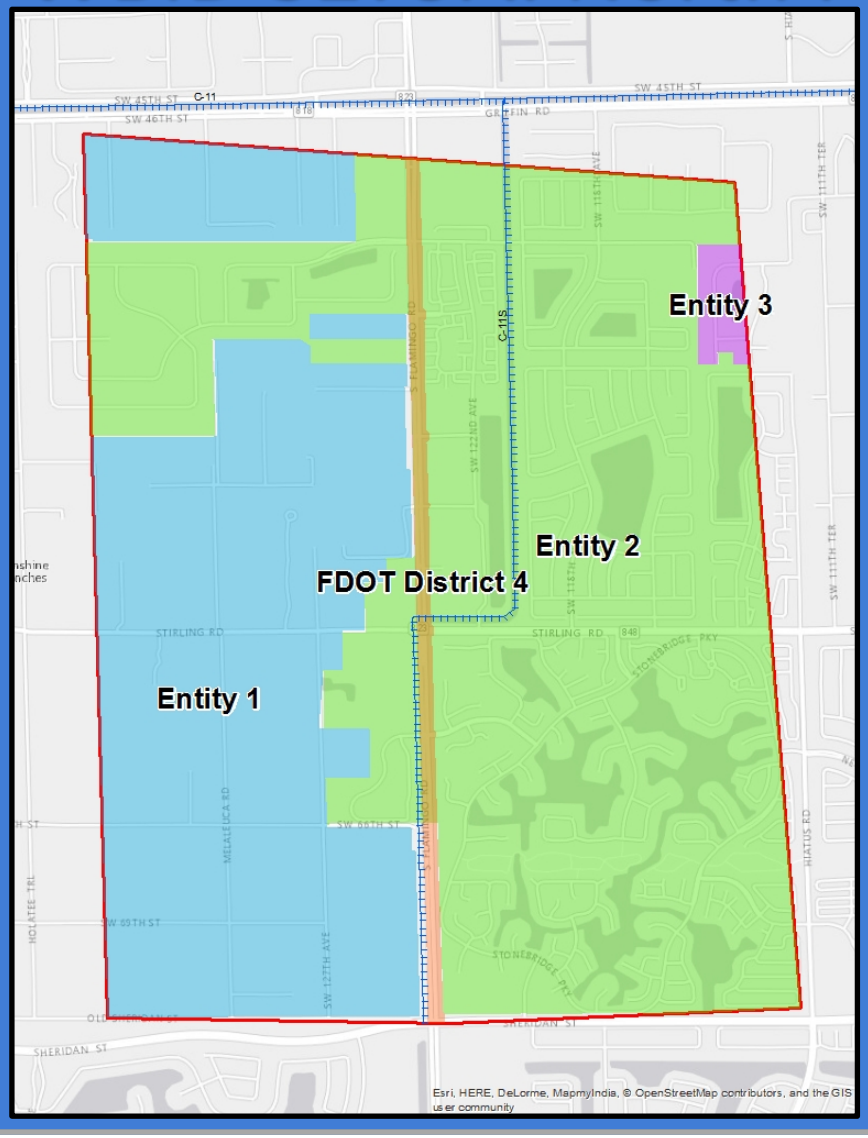
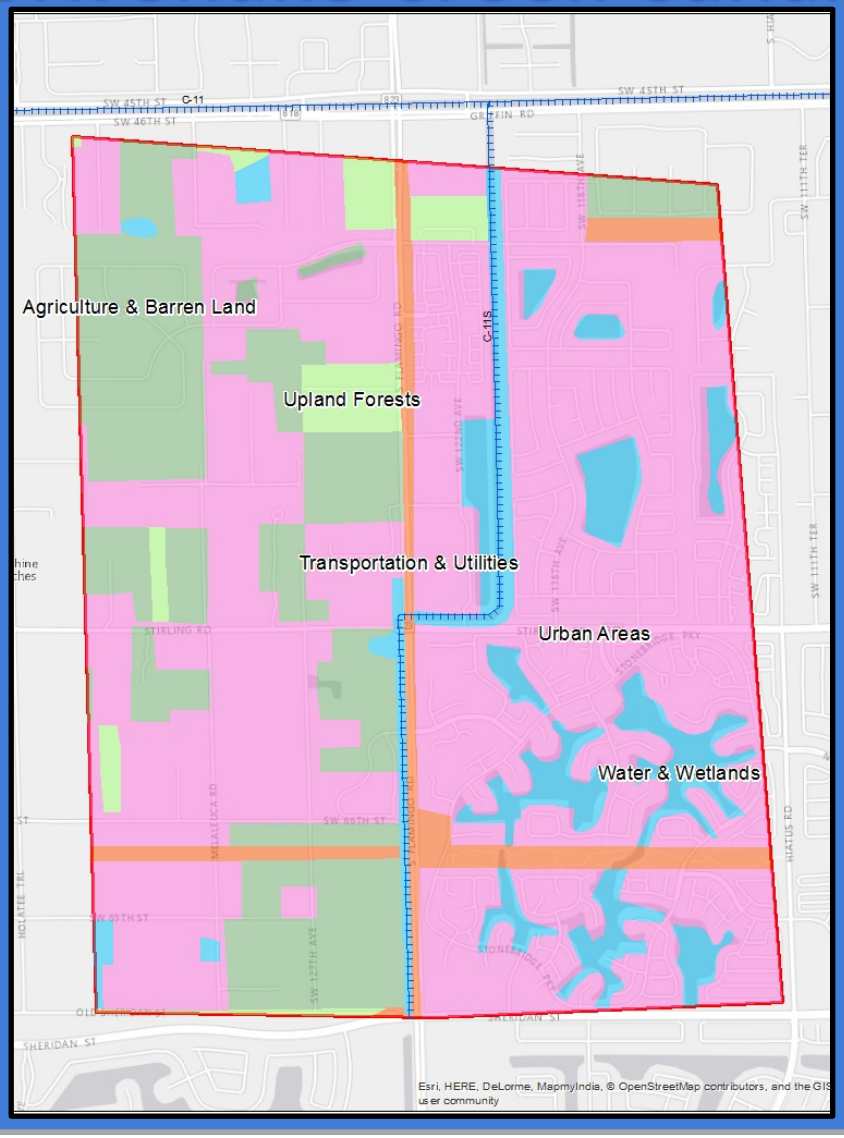
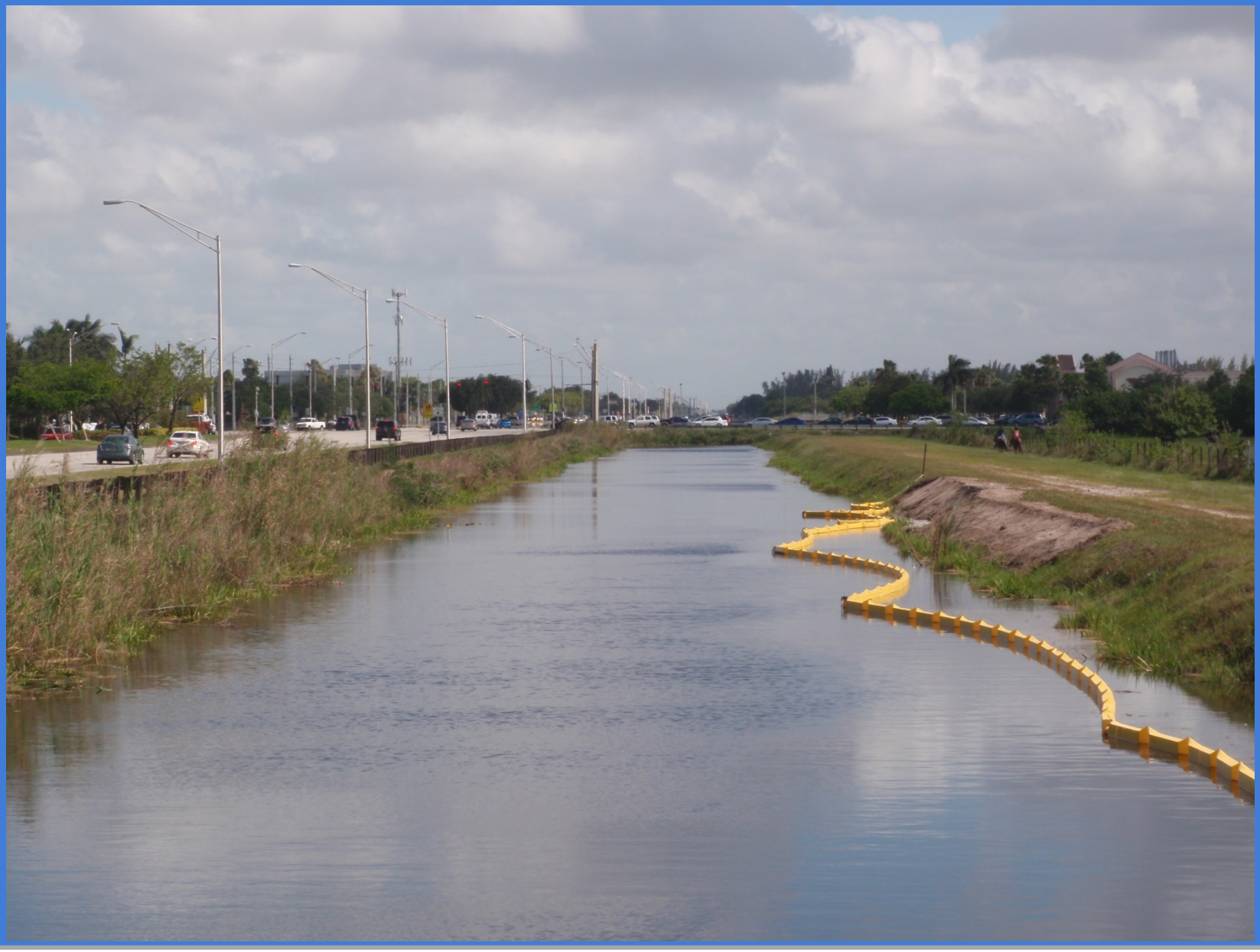






WBID 3279A: Background

- EPA established TMDL – August 2011
- FDEP did NOT verify the fecal coliform impairment.
  - Available data did not fulfill IWR requirements in Ch. 62-303 F.A.C which requires either
    - Minimum of 20 samples
    - Less than 20 samples from at least 5 temporally independent sampling events
  - Suggested ambient monitoring

Monitoring Approach

- The stakeholders decided to take FDEP's suggestion and submitted a Fecal Coliform Monitoring Plan.

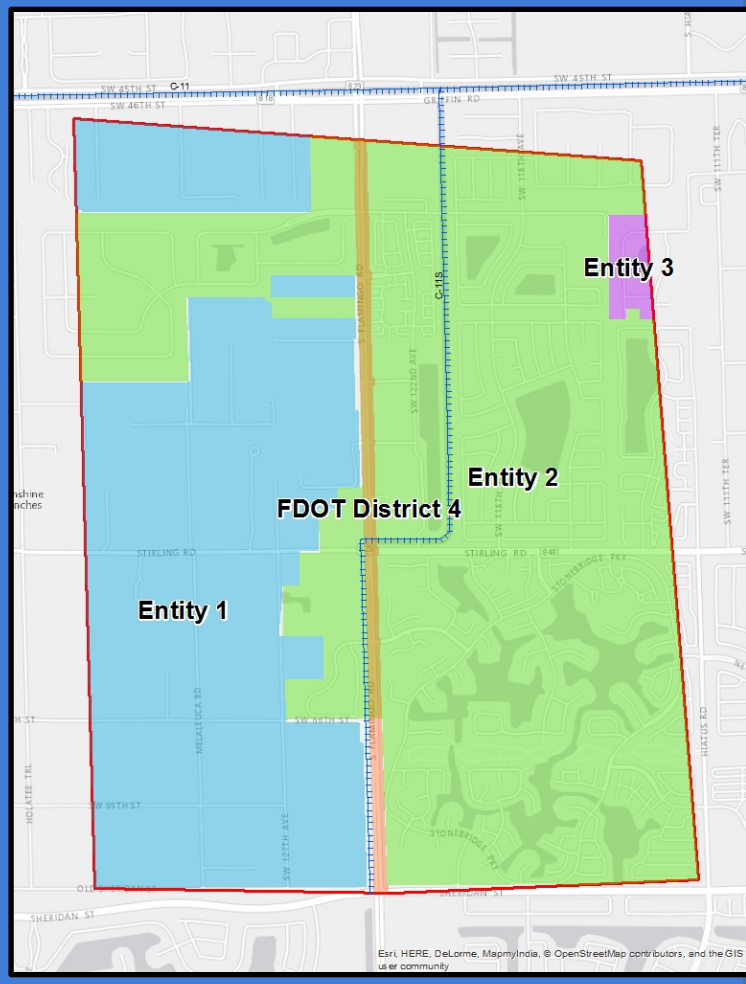
- This meant the BPCP would not be due within 30 months of permit issuance.

Monitoring Exclusions

- Entity 4 requested and was granted exclusion
- Based on the system within the WBID, FDOT did not feel they were a source and requested exclusion but it was NOT granted.

Task 1: BPCP for FDOT-4

- SR 823 Flamingo Road
- FDOT has a closed system in this area.
  - Runoff discharges to dry swales on the both side of the road.
  - Overflow from west side pipes under the road to the east side swales
  - Overflow from east swales discharges to canal via 8 outfalls
  - Separated from east properties by canal and west properties have system
- System was videoed to ensure no illicit connections/discharges

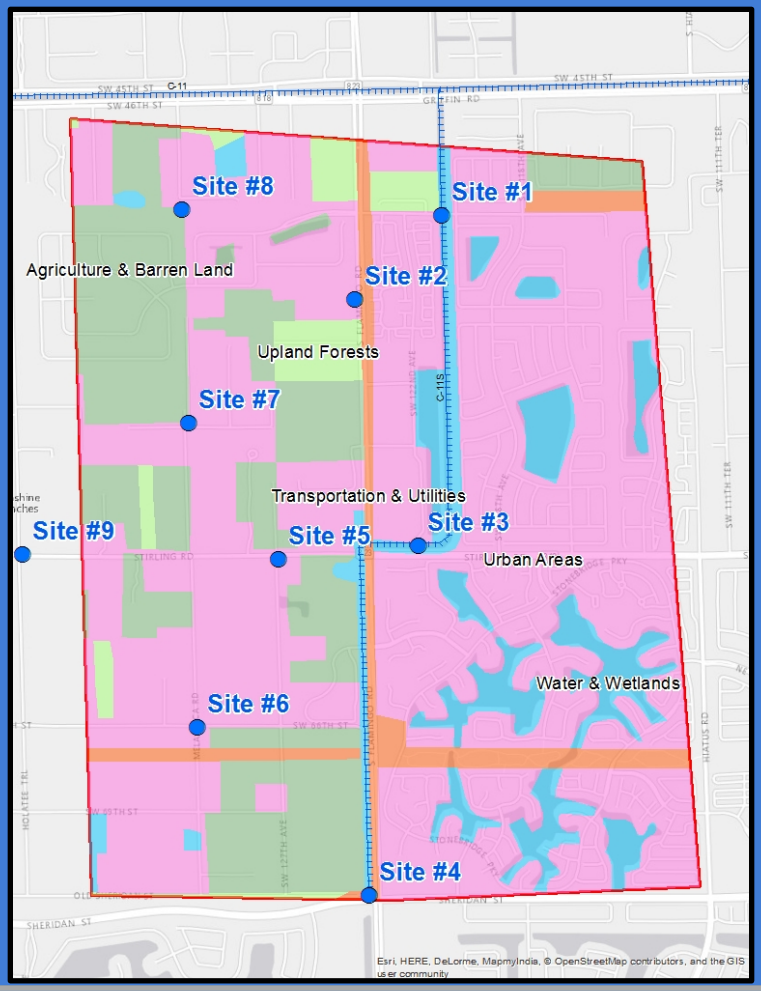


BPCP for FDOT-4

- September 2013, FDOT submitted a BPCP.
  - Outlined the results of the Walk the ROW event
  - Variety of sources investigated
    - Sewer Infrastructure
    - Onsite sewage treatment and disposal systems
    - Stormwater
    - Non-point sources
    - Wildlife
  - Explained the closed system.
  - Revealed the video inspection results.
  - Ongoing actions: inspections, education, and litter removal

BPCP Approved July 2014

Task 2: The Remaining Entities



- 24 months monitoring results confirmed the TMDL.
- Agreed to do a joint BPCP

Entity 1

- Residential on septic
- Gentleman Farms
- Horse Trails

Entity 2

- Commercial and residential on sewer (few septic remain)

Preparation for BPCP Events

- Have scheduled the kick off meeting, maps on the table, and Walk the WBID events.
- Invited multiple related entities including:
  - Department of Agriculture
  - Department of Health
  - South Florida Water Management District
  - South Broward Drainage District
  - Central Broward Water Control District

- Hope to gather information for educational purposes.

To Be Continued…

Resources for Preparing A BPCP

- Your Phase I NPDES MS4 permit
- 62-303 F.A.C. Impaired Water Rule
- FDEP Implementation Guidance Document
  - http://www.dep.state.fl.us/Water/watersheds/docs/fcg_toolkit.pdf

Thank You!