

Memorandum

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TO: Karen Cowan, Chair, Nitrogen and
Selenium Management Program

SUBJECT: BMP Strategic Plan Framework

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1.0 INTRODUCTION AND TECH MEMO PURPOSE

This technical memorandum (TM) provides an updated framework to develop the Best Management Practices (BMP) Strategic Plan for the Nitrogen and Selenium Management Program (NSMP) as described in Task 2.5 of the NSMP Work Plan. While the efforts of Task 2.4 (conducted in Year 2) resulted in promising information, no BMP was identified as effective and/or reasonable for full-scale implementation. Efforts during NSMP Year 3 (e.g. the development and modeling of six BMP implementation alternatives) identified that critical information is still needed to develop an effective BMP Strategic Plan for the Newport Bay watershed. The information gaps include a groundwater/surface water model, revised standards that will result from the development of the selenium SSO, and identification of feasible BMPs/treatment technologies. Therefore, the purpose of the framework is to provide an outline of the basic components that will be necessary to develop the BMP Strategic Plan and to provide a structure to guide discussion and decision points as the plan is developed during Years 4 and 5. The BMP Strategic Plan is a fundamental part of the NSMP Work Plan and thus effective and thorough review of each component during the various stages of development is critical to its success.

During Year 4 (July 2008 – June 2009), efforts will be focused on (1) coordination with OCSD and IRWD on the feasibility of sewer treatment for short-term discharges and as an implementation option for long-term discharges (2) conducting and evaluating the demonstration pilot scale testing of the GE/ABMet system to evaluate its effectiveness at a temporary location in the watershed (3) coordination with IRWD on initial results from Cienega System operations (4) development and modeling of additional BMP implementation options using the Simple Treatment- Related Model and available groundwater and surface water data for model validation (5) development of the draft BMP Strategic Plan.

The Draft BMP Strategic Plan will focus primarily on development of a purpose and vision, background information, and approach, incorporating information developed through the BMP tasks to date in Year 4. The Year 4 BMP tasks will provide information and data for the development of additional BMP implementation options as part of Phase II (full scale implementation) of the BMP Strategic Plan. The additional BMP implementation options will

be developed based upon the results of feasibility of sewer treatment, results of the demonstration pilot scale testing of the GE/ABMet system, results to date of the demonstration scale testing of IRWD's Cienega System, and the revised standards resulting from the Se SSO process. The additional BMP implementation options based on information from the results to date of the demonstration scale testing of IRWD's Cienega System and the results of feasibility of sewer treatment will be modeled with the Simple Treatment Related Model. The results of the model will then be incorporated into the Draft BMP Strategic Plan which will be developed by April 2009. The demonstration pilot scale testing of the GE/ABMet system and the Se SSO process will be completed at the end of Year 4 and so the results of these activities will be incorporated into additional BMP implementation options in Year 5.

During Year 5 (July 2009 – December 2009), efforts will be focused on the (1) development of additional modeled BMP implementation options as part of Phase II (full scale implementation) of the BMP Strategic Plan based BMP tasks completed to date and the revised standards resulting from the Se SSO process (2) presentation of the additional modeled BMP implementation options to the Working Group (3) selection by the Working Group of the most cost effective BMP implementation option that with the current information helps to achieve compliance with the Selenium SSO and the revised Nitrogen objective for the watershed, further referred to as the preferred alternative, which will serve as the foundation for (4) development of the Final BMP Strategic Plan. Once the preferred alternative is selected by the Working Group, the BMP Strategic Plan Phase I (technology validation) and Phase II (full scale implementation) sections will be completed. The Final BMP Strategic Plan will be completed by November 2009. In this outline, some text is provided in order to provide context for the various sections, but at this time, the content should be viewed as a basis for future discussion only.

Recognizing that the BMP Strategic Plan is intrinsically dependent upon completion of other NSMP tasks (e.g. Task 2.5 BMP Strategic Plan Subtasks, Task 5, the Selenium Site-Specific Objective), the plan will need to incorporate the results of these tasks during Year 5 (July 2009 – December 2009). The final BMP Strategic Plan will be submitted to the Santa Ana Regional Water Quality Control Board by December 2009.

2.0 MAJOR BMP STRATEGIC PLAN COMPONENTS

The major components for the proposed BMP Strategic Plan are:

- 1) Executive Summary (1 page)
- 2) Purpose & Vision (1 page)
- 3) Background Information (5 pages)
- 4) BMP Strategic Plan Approach (5 pages)
- 5) BMP Strategic Plan Phase I – Technology Validation (10 pages)
- 6) BMP Strategic Plan Phase II – Full Scale Implementation (10 pages)
- 7) Appendix A: BMP Strategic Plan Tools

2.1 *Executive Summary (1 page)*

The Executive Summary will give an overview of what the BMP Strategic Plan is, describe the key aspects of the plan and identify the components of the BMP Strategic Plan.

2.2 *Purpose & Vision (1 page)*

This section will identify the purpose of the NSMP BMP Strategic Plan and a vision of what the NSMP BMP Strategic Plan will be and contain. A draft purpose and a draft vision of the NSMP BMP Strategic Plan are provided below.

Purpose: The purpose of the NSMP BMP Strategic Plan is to provide a phased plan to implement treatment controls to meet the water quality objective for nitrogen and revised selenium standards resulting from the Se SSO process in the Newport Bay Watershed as referenced in Santa Ana Regional Water Quality Control Board Order Nos. R8-2004-0021 and R8-2007-0041.

Vision: The vision of the NSMP BMP Strategic Plan is a plan that effectively describes the candidate treatment controls needed to meet the water quality objective for nitrogen and revised selenium standards resulting from the Se SSO process in the Newport Bay Watershed, the type and approximate locations in the watershed where the treatment controls will be implemented, a timeframe for implementation of treatment controls, an expected cost of implementation of treatment controls in the watershed, and a BMP effectiveness monitoring program for nitrogen and selenium and the other pollutants of concern in the watershed to ensure the viability of Phase I – Technology Validation and identify the appropriate BMPs to implemented as part of Phase II – Full Scale Implementation of the BMP Strategic Plan

2.3 *Background Information (5 pages)*

This section will provide information about nitrogen and selenium issues facing the Newport Bay watershed, the impetus for the Nitrogen and Selenium Program (NSMP), the NSMP objectives, and a brief overview of the NSMP tasks that provide the basis for the BMP Strategic Plan.

2.3.1 Watershed Issues

Levels of Nitrogen and Selenium in the Newport Watershed

Nitrogen Levels

Selenium Levels

Regulatory Drivers (i.e. regulations driving reduction in Nitrogen and Selenium levels) in the watershed and in the Newport Bay.

2.3.2 NSMP Program

Impetus for Working Group and Program

The NSMP is a five-year work effort to comply with the requirements of a NPDES permit (Order No. R8-2004-0021) issued by the Santa Ana Regional Water Quality Control Board for the Newport Bay watershed in central Orange County, California.

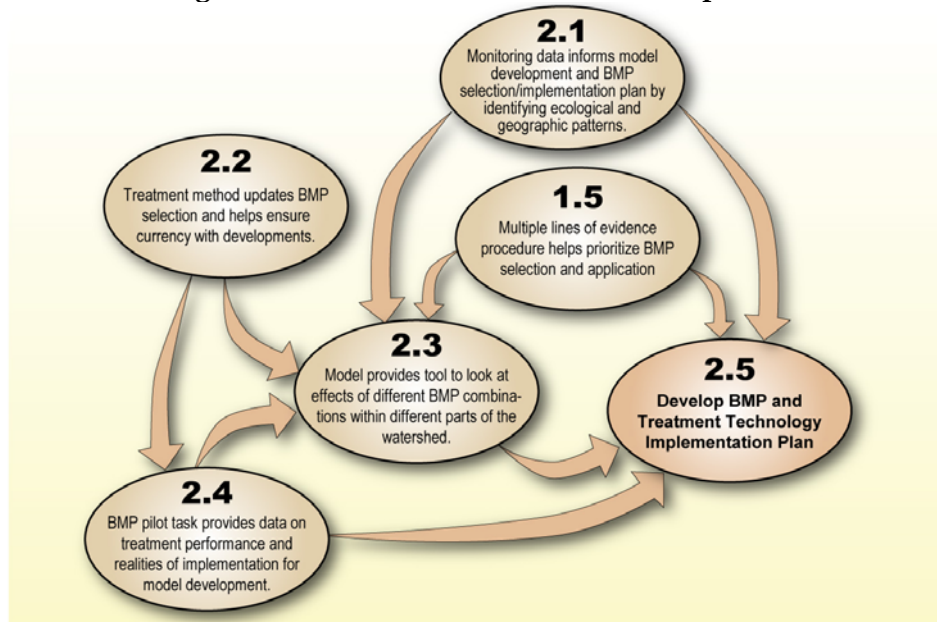
NSMP Program Goals and Objectives

- Compliance with Order No. R8-2004-0021 by implementing the detailed Nitrogen and Selenium Management Program Work Plan approved by the Regional Board;
- Develop a comprehensive understanding of and management plan for nutrients and selenium discharges to surface waters within the Newport Bay watershed that result from groundwater-related inflows.

2.3.3 NSMP BMP Strategic Plan Antecedent Tasks

This section will outline the tasks completed that relate to the formulation of the BMP Strategic Plan. The major components and conclusion/recommendations from each task will also be included to provide the proper context and background.

Figure 1. BMP Strategic Plan Predecessor Task Relationships



BMP Task Timeline

TASK	Year 2												
	Q1			Q2			Q3			Q4			
	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
1.5 Multiple Lines of Evidence							Analysis	Draft TM	Final TM				
2.1 Coordinate With Monitoring and Database Efforts	[Continuous activity]												
2.2 Survey Current Selenium and Nitrogen Treatment Methods	Updates								Draft TM	Final TM			
2.3 Develop Simple Treatment-Related Model							Model Development	Draft TM	Final TM				
2.4 Select and Pilot Test Candidate BMPs and Treatment Technologies	Selection & Siting			Permit & Site Prep	Test		Analysis	Draft TM	Final TM				
2.5 Develop BMP and Treatment Technology Implementation Plan (Task 2.5.1 Only)									BMP Modeling	Draft TM	Final TM		

Task 1.5 Multiple Lines of Evidence Approach to BMP Implementation
 This report compiles various lines of evidence into a ranking tool for evaluating Best Management Practices (BMPs) for the Newport Bay Watershed for the control of selenium and nitrogen loading in 2006-2007. Major components and conclusion/recommendations from the Task 1.5 Report will be discussed in this section.

Task 2.1 Coordinate With Monitoring and Database Efforts
 This report describes the data necessary to develop and evaluate potential selenium and nitrogen BMPs and treatment technologies for application in the Newport Bay watershed.

Task 2.2 Identification and Assessment of Selenium and Nitrogen Treatment Technologies and Best Management Practices

This report summarizes BMPs and treatment technologies to be considered for potential application in the Newport Bay Watershed to reduce selenium and nitrogen concentrations from dischargers of groundwater and/or surface water.

Task 2.3 – Simple Treatment-Related Model

This report describes the development of a draft Excel spreadsheet model that predicts total selenium and nitrate-nitrogen concentrations in the watershed in 2006-2007. Major components and conclusion/recommendations from the Task 2.3 Report will be discussed in this section. Details of the NSMP Year 3 efforts including development of the initial six alternatives, modifications to the Simple-Treatment Related Model and the associated research and coordination necessary for the six alternatives, modeling and associated model run results and comparison of the initial six alternatives, development of the revised two alternatives, model run results and comparison of the revised two alternatives, and identification of the critical information needed to develop an effective BMP Strategic Plan will be discussed in this section.

Task 2.4 Pilot Test Report for Nitrogen and Selenium Removal Technologies

The purpose summarizes the results of a BMP pilot test conducted for the NSMP in 2006-2007. Major components and conclusion/recommendations from the Task 2.4 Report will be discussed in this section.

2.3.4 NSMP Primary Tasks Affecting the BMP Strategic Plan

This section describes how other primary NSMP tasks completed affect the BMP Strategic Plan.

Task 3.0 Offset and Mitigation Program

A collaborative watershed program for addressing nitrogen and selenium reductions may provide the means to more efficiently allocate treatment costs and efforts in the watershed. Also, simple mitigation approaches may provide a means of compensating for impacts that cannot otherwise be reduced or managed.

Task 4.0 Evaluate Nutrient TMDL

The full relevance of the Nutrient TMDL to the BMP Strategic Plan will be described in detail.

Task 5.0 Development of a Selenium Site Specific Objective (SSO)

The full relevance of the SSO to the BMP Strategic Plan will be described in detail. Current understanding of selenium speciation and bioaccumulation suggest that the presence and magnitude of selenium impacts on wildlife are strongly affected by site-specific factors. A single criterion is not applicable for all watersheds and development of an SSO is proceeding. The Se SSO development will be in process at the time of the development of the Draft BMP Strategic Plan (April 2009) and so will not be incorporated into the Draft BMP Strategic Plan, however the revised standards resulting from the Se SSO process will be

incorporated into the Final BMP Strategic Plan acknowledging the fact that the SSO will not take affect until it is approved by EPA and until that time the current selenium water quality criterion is the current standard. This however will most likely only affect Phase II- Full Scale Implementation of the BMP Strategic Plan.

2.4 *BMP Strategic Plan Approach (5 Pages)*

This section will outline the approach used to formulate the BMP Strategic Plan. The plan must be flexible so it can adapt over time as more information becomes available and phased to allow for capitalization, refinement, and adaptation at set points in the process. The Strategic Plan is expected to be 10-15 years in duration with two phases.

2.4.1 Rationale for a Phased Approach

This section will outline why a two-phased approach is being recommended, the benefits of this approach, and the basis for recommending certain projects. Phase I (2010 to 2013-2015) will act as a technology validation phase while Phase II (2013-2015 to 2020-2025) will focus on full scale implementation. The reasoning behind using Phase I of the Strategic Plan for technology validation includes: 1) the proposed technologies are not yet proven and need to be verified with long-term demonstration scale testing to remove nitrogen and selenium below the water quality standards, 2) the technologies are very costly and implementing with out validating them first may end up being a waste of capital, 3) there are other pollutants of concern in the watershed and a better long-term understanding of which technologies are effective at removing those pollutants is critical prior to full scale implementation, 4) the BMP Strategic Plan represents a major capital improvement investment to restore and maintain beneficial uses in the watershed and so the technologies that will serve as its foundation need to be validated as part of Phase I prior to Phase II full scale implementation. The phased approach will allow adaptation of the BMP Strategic Plan from Phase I to Phase II. Phase II will be modified and more robustly developed based upon the results of Phase I, including a more detailed understanding about BMP effectiveness and operation cost, development of potentially more effective technologies, and more thorough knowledge of the watershed specifically in the area of groundwater. Phase II will build upon work in Phase I to refine the BMP Strategic Plan so the best technology and most appropriate sites are selected for full scale implementation. Phase I will also provide permanent load reductions in the watershed so it will not only provide a validation of technologies but improvement in water quality as well.

Phase I of the BMP Strategic Plan will validate technology effectiveness (i.e. constituent(s) removal), what technologies work best under different conditions, and allow for a better understanding of treatment technology operation and maintenance costs. The location of the Phase I projects will be dependant on available land and proximity to reaches with selenium and nitrogen concentrations above the current

standards but may also be dependent on where the points of compliance are identified in the watershed. The Phase I representative projects will be implemented at:

- Reaches to protect areas of ecological sensitivity downstream

- Reaches with concentrations of N or Se that exceed their respective water quality objectives (WQOs) OR just “nitrogen and selenium hot spots.”

- Reaches with high flow rates that also exceed WQOs for Se and N: geographic nodes from the model (i.e. locations where large quantities of flow can be treated) as described in the Task 2.3 report. Projects of this type could treat part of the total flow in a high-flow reach of the watershed.

Phase I will also evaluate if a BMP results in potentially hazardous side effects, such as the release of more bioavailable Se. Phase I is designed to understand the overall effectiveness of the BMPs including technical effectiveness for removing the pollutants of concern in the watershed, cost effectiveness both capital and operation and maintenance, and effectiveness in the ultimate goal of protecting beneficial uses.

Phase II of the plan will review the results of Phase I and determine the best technologies to move forward with for full implementation. Final locations for BMPs will be selected and a cost estimate will be developed for the final phase of the program.

2.4.2 BMP Strategic Plan Adaptive Management Approach

Adaptive Management will be used to develop a list of future projects based on lessons learned from Phase I.

Adaptive management is a systematic process for continually improving management policies and practices by learning from the outcomes of operational programs. The adaptive management process can be portrayed as a six-step cycle, and emphasizes that successful adaptive management requires managers to complete all six steps: Assess Problem, Design (Planning and Permitting), Implement (Construction), Monitor, Evaluate (Lessons Learned), and Adjust (Optimization).

Adaptive Management will include a process to:

- Allow for refinement of decision making processes for Phase II full scale implementation

- Reevaluate data and model projections based on real world data

- Allow each project to become both a measure to meet compliance and a test of the technology

- Evaluate Phase I technology validation successes and challenges

- Incorporate new and/or additional information from new studies and/or emerging technologies; additional data

- Reassess multiple lines of evidence based on field data

2.5 *BMP Strategic Plan Phase I Technology Validation (10 pages)*

This section of the report will provide the details of Phase I Technology Validation of the BMP Strategic Plan including a description of each of the Phase I projects, locations for the Phase I projects, estimated selenium and nitrogen load removal for the Phase I projects, an effectiveness monitoring protocol, Phase I projects operation and maintenance, estimated capital and operation and maintenance costs for the Phase I projects, areas of additional study, and the Phase I schedule.

2.5.1 Phase I Projects

This section will provide a list, description, and locations of the Phase I projects. The Phase I projects will encompass the technologies being considered for Phase II full scale implementation. At this time the following technologies that are being considered:

- Cienega
- ABMet
- Conventional Subsurface Flow Wetlands
- Permeable Reactive Barriers
- Groundwater Pump and Treatment System

2.5.2 Load Removal

This section will estimate the nitrogen and selenium load removal associated with each of the Phase I projects. This estimate will be based on the most up to date pollutant removal data for each of the technologies.

2.5.3 Effectiveness Monitoring Protocol

This section will identify a monitoring protocol to measure the effectiveness of each of the BMPs. The monitoring protocol will be developed based on previous BMP effectiveness studies and ensure that adequate data to evaluate all aspects of the BMPs is being collected, analyzed, and reported.

2.5.4 Operation & Maintenance of BMPs

This section provides an outline of the operation and maintenance requirements needed for all of the Phase I BMPs. This will include:

- Operational Procedures for each BMP
- Responsible Parties
- Maintenance Activities
- Waste Disposal

2.5.5 Costs

This section will provide estimated capital, operations and maintenance, and effectiveness monitoring program costs associated with each of the Phase I BMPs.

2.5.6 Additional Information Protocol

This section will provide a protocol for identifying and evaluating information that may contribute to or affect Phase II of the BMP Strategic Plan. Some of this information includes new technologies for treating nitrogen and selenium, additional watershed information including water quality data and groundwater information, changes in MS4 permits or water quality regulations, changes in other stakeholder agreements (i.e. OCSD agreement for discharge of urban runoff to the sanitary sewer).

2.5.7 Phase I Schedule

This section will provide a timeline for the project phasing for all of the Phase I projects. An estimated timeline for Phase I is:

Duration: 3-5 years (including environmental, design, construction and testing)

Year starts: 2010 (Year 1)

Demonstration Scale Permanent Projects

Cienega BMP

ABMet BMP

Subsurface Flow Wetland

Permeable Reactive Barriers

Groundwater Pump and Treatment System

Phasing Schedule and Components

Schedule

Timeline for all Phases

Phase I Projects

Planning and Permitting

Construction

Effectiveness Monitoring

Additional Information Incorporation

Phase I Effectiveness Assessment

Recommended Changes for Phase II

Phase I Project Optimization

2.6 *BMP Strategic Plan Phase II Full Scale Implementation (10 pages)*

This section of the report will provide the details of Phase II Full Scale Implementation. With the information on treatment technologies and the watershed to date and the results of the modeled BMP implementation options Phase II Full Scale Implementation will be developed based on the selection by the Working Group of the most cost effective BMP implementation option that with the current information helps to achieve compliance with the Selenium SSO and the revised Nitrogen objective for the watershed.

2.6.1 List of Potential Projects

This section will provide a list, description and general locations of the Phase II projects based on the selected and modeled preferred alternative selected by the Working Group. It should be noted that the list, type and location of Phase II projects will be revised at the conclusion of Phase I with more detailed information regarding effectiveness of BMPs and more detailed information about the watershed being develop during the Phase I timeframe.

2.6.2 Load Removal

This section will estimate the nitrogen and selenium load removal associated with each of the Phase II projects. This estimate will based on the most up to date pollutant removal data for each of the technologies.

2.6.3 BMP Siting Protocol

This section will provide detail on a protocol for siting of BMPs. Although the preferred BMP implementation option will provide a general location of where BMPs should be located to achieve compliance the task of siting specific BMPs will still need to be completed before BMPs can be constructed. This protocol is design to assist in locating specific sites to implement BMPs. Siting of BMPs for Phase II can only take place when the preferred technology or technologies from demonstration scale testing of Phase I is conclusive and when more detailed information about the watershed is understood, specifically information about groundwater.

2.6.4 Operation & Maintenance of BMPs

This section provides an outline of the operation and maintenance requirements needed for all of the Phase II BMPs. This will include:

- Operational Procedures for each BMP
- Responsible Parties
- Maintenance Activities
- Waste Disposal

2.6.5 Costs

This section will provide estimated capital, operations and maintenance, and effectiveness monitoring program costs associated with each of the Phase II BMPs.

2.6.6 Phase II Schedule

This section will provide a timeline for the project phasing for all of the Phase II projects. An estimated timeline for Phase II is:

Duration: 7-10 years (including environmental, design, construction and testing)
Year starts: 2013-2015

Phase II Components

Implement recommended changes for Phase II as identified in Phase I
BMP Siting Study
BMP Implementation
 Planning and Permitting
 Construction
 Monitoring
Phase II Project Optimization

2.7 *Appendix A: Tools for BMP Strategic Plan*

This section of the report will outline the tools used to develop the BMP Strategic Plan and provide guidance documents outlining how to update the plan. Specifically, this section of the report will outline how to use the multiple-lines of evidence scoring in conjunction with the model to select BMP sites through a checklist. An example of how the Phase I projects were selected will be provided.

2.7.1 Multiple-lines of Evidence Report Formulation of Weighting of Evidence Approach Scoring procedure

2.7.2 Simple Treatment-Related Model Model objective dependent on S.S.O. or current regulatory objectives Performance update and calibration of the model after Phase I of the BMP implementation plan. The model will be updated in Phase II using the data collected in Phase I of the BMP Strategic Plan and other information in the watershed such as groundwater information. Cost adjustments of the BMPs to account for total treatment costs including solids disposal, energy, and land acquisition Verification of water quality data within watershed

2.7.3 Checklist of how to use model and multiple lines of evidence information Example of how to select site for BMP Strategic Plan in conjunction with the BMP Siting Protocol identified in Section 2.6.3. Map of watershed showing (high flow area, areas

of special biological significance, and reaches with concentrations of N or Se far above the background levels)

2.7.4 Guidance Fact Sheets

The Guidance Fact Sheets will provide recommendations for review of future BMP implementation and will be included as subsections of this section of the BMP Strategic Plan. These fact sheets are intended to be tools to use for updating the BMP Strategic Plan as part of the phased approach.

The documents will include:

- Fact Sheet on Data Update: guidance on how, what, and where to update data
- Fact Sheet on improving BMP performance
- Fact Sheet on technology advances (both within watershed and related to technology testing)
- Fact Sheet on how to update multiple lines of evidence scoring (i.e. habitat scoring procedure)
- How to use Checklist for Selection of BMPs for implementation at a site
- Model Update Fact Sheet: guidance on the model update process as more data becomes available to refine the model

3.0 NEXT STEPS

A detailed timeline is provided below that identifies the process and development of the BMP Strategic Plan. The BMP Strategic Plan will be a stand alone document that will guide how compliance is to be achieved in the watershed. The Final BMP Strategic Plan, to be completed in November 2009, will be a living document that will need to be updated at the conclusion of Phase I Technology Validation and prior to Phase II Full Scale Implementation. The BMP Strategic Plan will also inform the Selenium TMDL Implementation Plan as that document will identify the range of possibilities for compliance with the TMDL but as is traditionally done with TMDL Implementation Plans will not identify how compliance is to be achieved. The Selenium TMDL Implementation Plan will reference the BMP Strategic Plan, however as stated previously the BMP Strategic Plan will identify how compliance will be achieved in the watershed.

3.1 *BMP Strategic Plan Timeline*

Year 4

- Implement Task 2.5 Sub tasks (November 2008-May 2009)
 - o Sewer feasibility coordination and investigation
 - Investigation of GWRS possibilities
 - Meet with OCSD/OCWD/IRWD in January with details of investigation
 - o Cienega coordination and other BMP investigation/coordination (SSF Wetlands & PRBs)

- AbMet Testing (March – May 2009)
- Develop revised BMP implementation option with Cienega full implementation and model (March 2009)
- Develop revised BMP implementation option (Phase II) with sewer/GWRS and model (March 2009)
- Presentation of modeled alternatives (Phase II) to Working Group (April 2009 WG Meeting)
- Develop Draft BMP Strategic Plan by April 30, 2009
 - Incorporate model runs for Cienega & sewer
- Presentation of Draft BMP Strategic Plan to WG (May 2009 WG Meeting)
- Review of Draft BMP Strategic Plan by WG (May – June 15, 2009)
- Address WG comments on Draft BMP Strategic Plan (June 15 – 30, 2009)
- Complete Year 4 Subtasks and SSO development (June 30, 2009)

Year 5

- Develop additional BMP Implementation Options (Phase II) based on final SSO, AbMet testing results, Cienega test results, sewer coordination (July 2009)
- Presentation of additional BMP implementation options (Phase II) to Working Group (August 2009 WG Meeting)
- Selection of the most cost effective BMP implementation option (Phase II) that with the current information helps to achieve compliance with the Selenium SSO and the revised Nitrogen objective for the watershed (September 2009 WG)
- Development of Final BMP Strategic Plan (Sept – Oct 2009)
 - Phase I Technology Validation
 - Phase II Full Scale Implementation - Incorporate WG selected BMP implementation option
- Presentation of Final BMP Strategic Plan to Working Group (October 2009 WG Meeting)
- Review of Final BMP Strategic Plan to Working Group (October 2009 WG Mtg. – two weeks)
- Finalize Final BMP Strategic Plan by November 2009 WG Meeting
- Presentation of Final BMP Strategic Plan to Working Group (November 2009 WG Meeting)