Changes from earlier versions presented to NSAB: 9/30/2022

1. Settled on a standardized approach for assigning nutrient EMCs for presently approved SCMs, documented this in Section B and tightened up language in that section.

2. Settled on a standardized approach for assigning nutrient EMCs and hydrologic performance ratings for not-yet-approved SCMs and documented in Section C.

3. New assigned EMCs added to Table A-2, and to each SCM’s subsection in Section D. For each SCM in Section D we described how nutrient EMCs were calculated and listed the studies and references that went into that calculation, if available. References for TSS were not updated (I do not have this data).

4. I have accepted all changes for formatting and renumbering of figures and tables. Anything moved without edits has also been accepted.

5. We present a new, structured approach to setting Minimum Design Criteria or use limitations, as well as a refined/clarified approach to assigning hydrologic and nutrient reduction performance rating.

6. We make no distinction between requirements for proprietary and non-proprietary SCMs. Instead we assume “2 studies to play and limited use, 4 studies for wider use and more favorable assignment of performance ratings”

7. We created a concept of “Provisional Minimum Design Criteria” to cover those SCMs that only have 2 or 3 studies – this is in response to understanding that 2 or 3 studies is not enough to understand SCM performance across a wide range of conditions and enable DEQ the option to update MDC with additional data. This really is part of the larger process of developing Minimum Design Criteria, which we have few details on.

8. SCMs with MDC in Rule are considered “non-provisional” and require rulemaking to adjust them. We want to ensure that SCMs that have MDC put into Rule have adequate study to ensure good performance across the range of conditions they’re likely to be used in

9. Study/monitoring requirements have been refined

10. Report/data submission requirements proposed to use International BMP Database datasheet format. While extensive, this would help us ensure we’re getting all the data we need without having to be specific about all of it.