

PHASE II SMALL MS4 GENERAL PERMIT

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Public Hearing
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Overview

- Permit Schedule
- Stakeholder Process and Outcomes
- Significant Changes Summary
- Public Workshop and Written Comments Summary

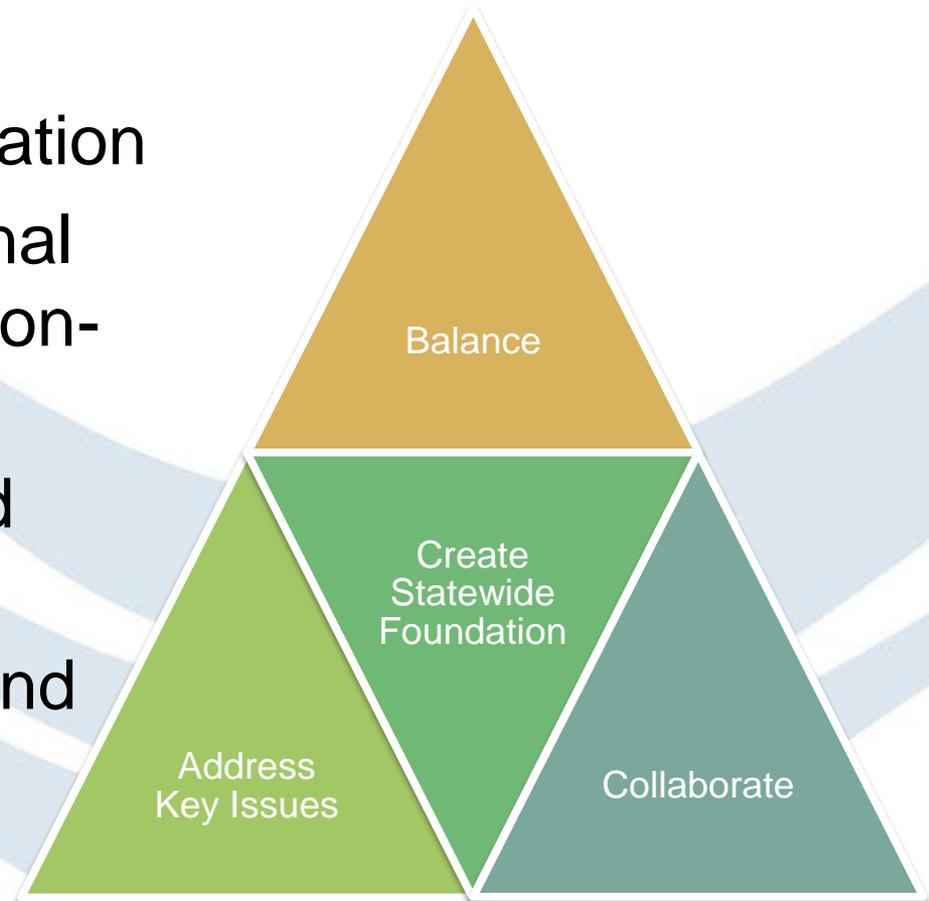


Permit Schedule



Stakeholder Process

- Create statewide foundation
- Collaborate with Regional Boards, Small MS4s, Non-governmental groups
- Address key issues and concerns
- Balance water quality and cost- effectiveness



Water Quality

- Studies indicate number of waterbodies listed as impaired by urban storm water is increasing
- Draft Order specifies actions to reduce pollutant discharges in storm water
- Based on EPA's MS4 Improvement Guide

Waterbodies Impaired by Urban Storm Water		
Year	Acres Impaired	Miles of Streams/Rivers
1992	239,423.00	633.00
1994	254,197.00	739.00
1996	262,457.00	1,351.00
1998	521,249.00	1,426.66
2002	781,780.33	3,845.33
2006	806,817.83	4,582.79
2010	871,144.77	5,037.70

Source: State Water Board

Revision Goals

- ✓ Focus on most significant water quality issues
 - Post-Construction
- ✓ Focus on cost-effective requirements
 - Low Impact Development
- ✓ Target high priority water bodies
 - Areas of Special Biological Significance (ASBS)
 - Total Maximum Daily Loads (TMDLs)



Summary of Significant Changes

- Annual Cost Analysis
- Industrial/Commercial Inspection Program
- Mandatory Construction Inspection Frequency
- Trash Reduction Program
- Non-traditional Specific Provisions
- Public Outreach and Education CBSM
- Water Quality Monitoring
- Post-Construction Requirements

Public Workshops and Written Comments Summary

1. Cost of Compliance
2. Receiving Water Limitations
3. Timeframe
4. Incidental Runoff
5. Municipal Load Quantification
6. Water Quality Monitoring

Cost of Compliance

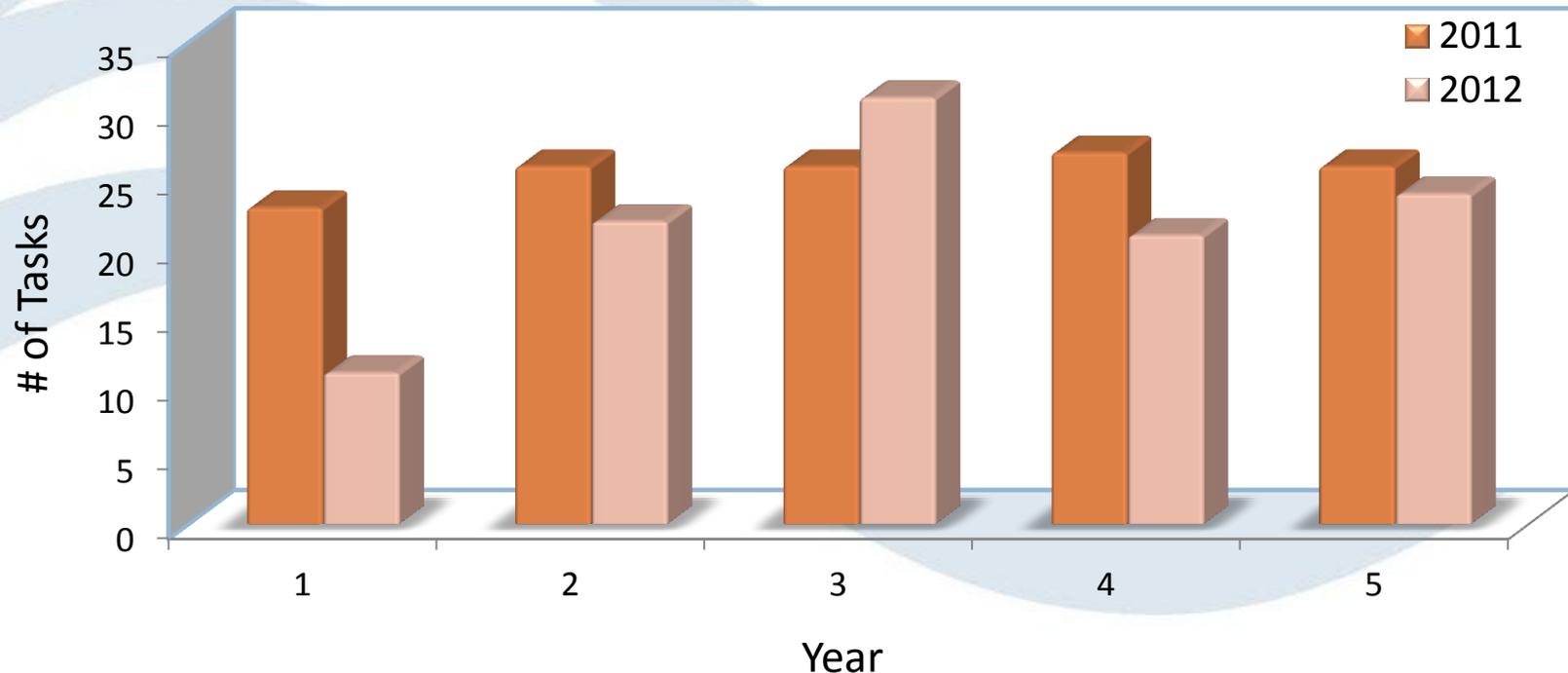
- Undefined environmental variables and unknown level of program implementation
- Many of the BMPs existed prior to MS4 permit issuance (storm drain maintenance)
- True cost = fraction of total cost
- Cost estimates often do not account for environmental and social well being
- Despite challenges, Staff attempted to calculate a number

Receiving Water Limitations

- Dischargers concerned with potential for non-compliance with permit terms even when implementing iterative process
- Non-governmental organizations support current language
- Issue relevant to multiple permits
- Proposed: Board workshop this fall; re-opener clause included in Order

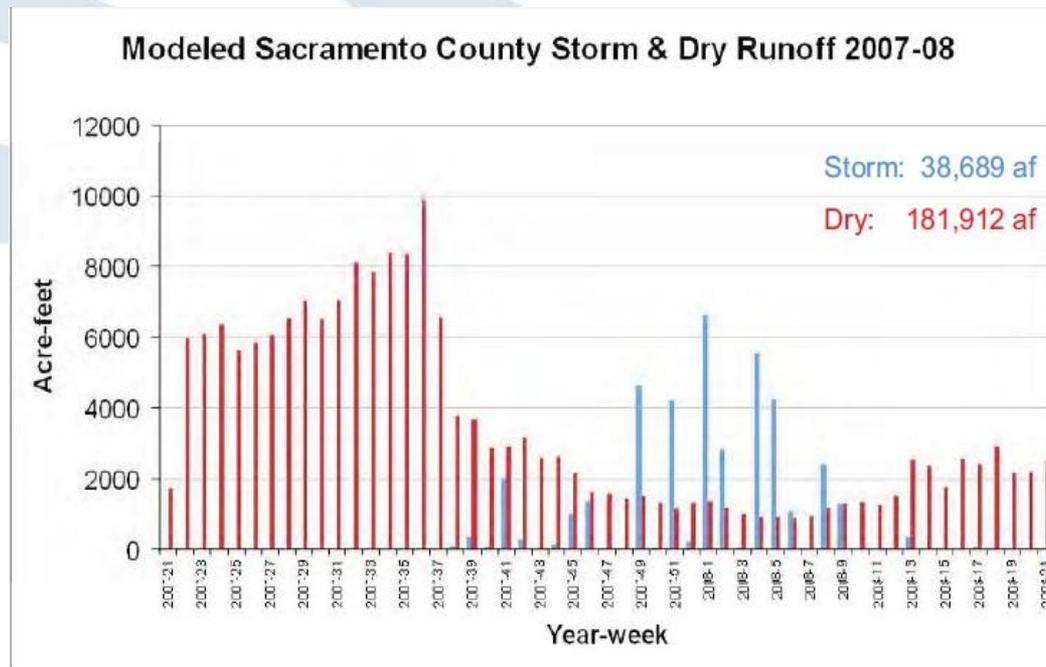
Timeframe

- Careful consideration of compliance dates
- Pushed out, gradually phased-in
- Comparison of 2011 Draft vs. 2012 Draft



Incidental Runoff

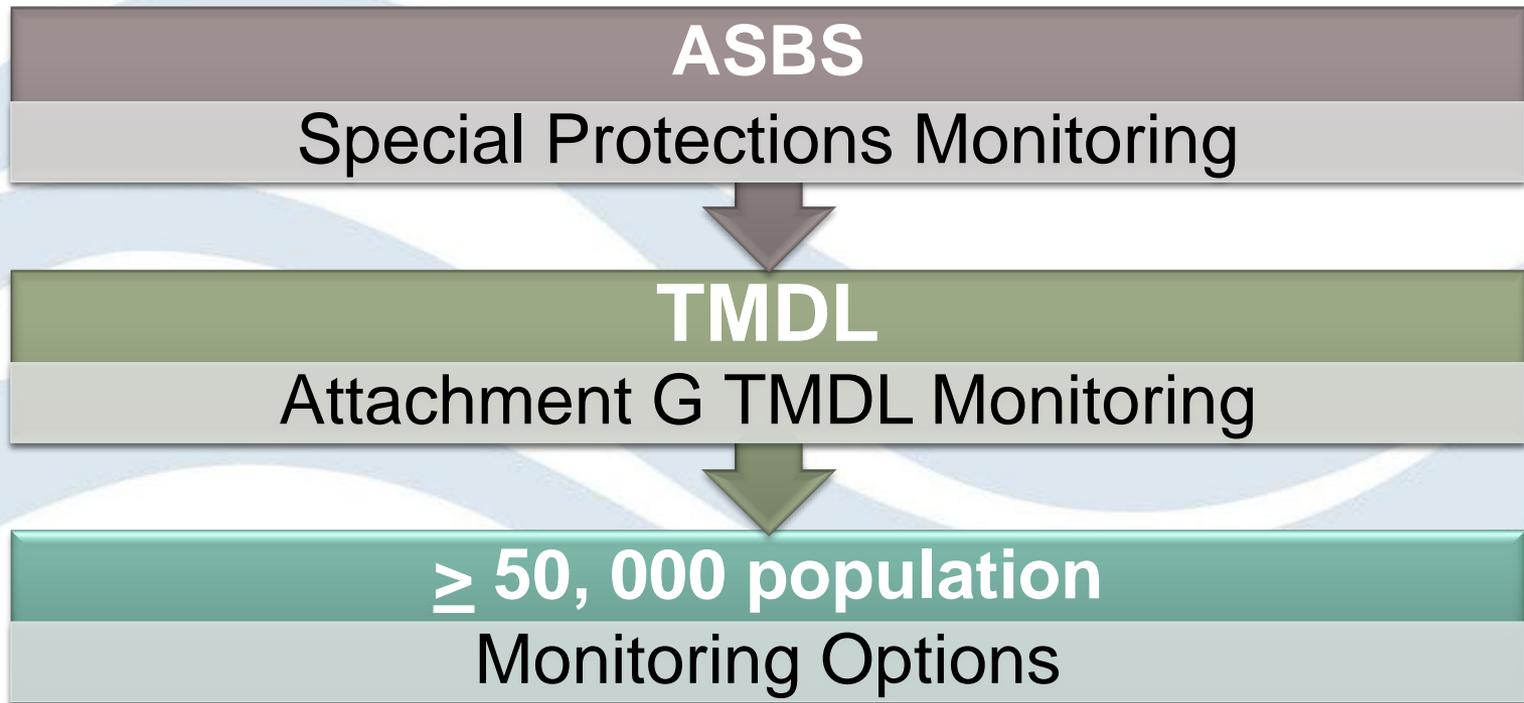
- Incidental runoff aka “urban slobber” major cause of water quality pollution
- Discharge Prohibition B.4, requires control of incidental runoff through implementation of conditions



Pollutant Load Quantification

- Pollutant loads and runoff volumes calculated on annual basis
- Quantifies pollutant load and runoff reductions resulting from implementation of program elements
- Allows storm water managers to prioritize and redirect resources as necessary
- Ex. Public Outreach and Pet Waste Reduction

Water Quality Monitoring





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