

# Consideration of Draft Resolution Directing Actions to Reduce Costs of Compliance



September 24, 2013  
Agenda Item #7

# Background



- **Board Initiated Resource Alignment Project (2011)**
  - Sources and uses of funding
  - Priority setting
  - Workload outputs
- **Phase 2: Cost of Compliance (2012/13)**
  - Four stakeholder groups formed
    - ✦ NPDES POTWs
    - ✦ WDR
    - ✦ Irrigated Lands
    - ✦ Stormwater
  - Proposed resolution documenting progress to date and directing staff to take additional action

# Summary of Proposed Actions



- Continue working with stormwater, irrigated lands, and WDR stakeholders
- Evaluate on sanitary sewer systems requirements established by Regional Water Boards
- Document and report on additional steps recommended to ensure transparent, consistent and efficient processes for issuance and reissuance of individual NPDES permits.
  - Identify duplicative monitoring or unnecessary reporting
  - Encourage use of surrogate or representative sampling
  - Document need for special studies

# Summary Proposed Actions (continued)



- Convene workshops and training with USEPA to develop a common understanding on the use of existing regulatory tools
  - water effect ratio studies
  - mixing zone/dilution credit studies
  - use attainability analyses
  - site specific objective and effluent limit development
- Pilot the evaluation of cost considerations in the development of the Biological Objectives Policy
- Evaluate and identify “best practices” for incorporating provisions in TMDLs that better provide for phased implementation and periodic review
- Report progress every six months

# Comments and Changes



- **1 comment letter from NPDES POTW Stakeholders**
  - Requested modification to resolve 3 to clarify requirement that reduced no spill reporting be implemented even when a Regional Board SSO order is in in place
- **Other late revisions**
  - Added specificity to whereas 12(c) on costs and potential savings associated with improving efficiency in monitoring and reporting
  - Extended completions dates for resolves 3 and 4
  - Added a completion date to resolve 7