

Port of Stockton, Permit Amendment - USEPA/Region 9 Comments, 29 August 2014

Elizabeth – two comments on the tentative order to amend the Port of Stockton MS4 permit.

Citations below from Resolution document:

USEPA Comment #1

5. The Permittee was issued an Administrative Order on Consent [AOC] (Docket No. CWA-309(a)-10-003) from the United States Environmental Protection Agency, Region 9 (USEPA) on 4 December 2009. The AOC was terminated on 5 January 2011. This amendment to Order R5-2011-0005 does not change the Permittee's responsibility to comply with the USEPA's AOC.

EPA Region 9 agrees the permittee fulfilled the requirements contained within the AOC and it has been terminated.

Still, the Permittee still has the responsibility to achieve the MEP standard and all the requirements contained within the NPDES permit.

USEPA Comment #2

6. i. Organochlorine pesticides and polychlorinated biphenyls (PCBs) have not been detected in the Port's urban discharge monitoring since 2011. This Order includes revisions to discontinue monitoring for organochlorine pesticides and PCBs.

EPA strongly recommends Regional Board retain monitoring for PCBs and organochlorine pesticides in discharge outfalls and in receiving waters. Monitoring frequency for these compounds should be at least once during permit term; and permittee should utilize analytical methods with sufficiently sensitive analytical methods with MDLs below the applicable water quality objective to yield numeric results to be used in program management and surface water assessments. Reports of pollutants "not been detected" need to be supported by analytical methods with appropriate MDLs as well as such pollutants should be adequately described and addressed in the permittee's current SWMP.

respectfully,

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