

15 July 2009
DRAFT BASIN PLAN AMENDMENTS

Text additions to the existing Basin Plan language are underlined and text deletions are indicated by ~~strike through~~. (NOTE: For this review edition, underline is not used for ease of reading; everything below is new language) Revise Basin Plan sections as follows:

Revise Chapter II (Existing and Potential Beneficial Uses), Table II-1 for Sacramento San Joaquin Delta:

Footnote (9) COMM is an EXISTING beneficial use for waterways listed in Appendix 43.

Revise Chapter III (Water Quality Objectives), Methylmercury, to add as follows:

The following fish tissue objectives apply to the Sacramento-San Joaquin Delta and Yolo Bypass waterways listed in Appendix 43. The average methylmercury concentrations shall not exceed 0.08 and 0.24 mg methylmercury/kg, wet weight, in muscle tissue of trophic level 3 and 4 fish, respectively (150-500 mm total length). These objectives are protective of (a) humans eating 32 g/day of commonly consumed, large fish; and (b) all wildlife species that consume large fish. The average methylmercury concentrations shall not exceed 0.03 mg methylmercury/kg, wet weight, in whole fish less than 50 mm in length. This objective is protective of wildlife species that consume small fish.

Revise Chapter IV (Implementation), under “Mercury Discharges in the Sacramento River and San Joaquin River Basins” to add:

Delta Mercury Control Program:

The Delta Mercury Control Program applies to the Delta and Yolo Bypass waterways listed in Appendix 43.

This control program was adopted by the Regional Water Quality Control Board on [xxx date] and approved the U.S. Environmental Protection Agency on [zz date] (aka effective date).

A. Load and Waste Load Allocations, Margin of Safety, and Compliance Date

Load and Waste Load Allocations: Waste load allocations for point sources and load allocations for non-point sources are listed in Tables A-D. New or expanded methylmercury discharges that begin after [the effective date of this amendment] may necessitate adjustments to the allocations.

Allocations are specific to Delta subareas, which are shown on Figure xx-x. The load allocations for each Delta subarea apply to the sum of annual methylmercury loads produced by agricultural lands, wetlands, and open-water habitat in each subarea, as well as atmospheric wet deposition to each subarea. The subarea allocations apply to discharges that existed since [the effective date of this amendment] and new discharges that began after [the effective date of this amendment].

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Methylmercury allocations are assigned to tributary inputs to the Delta and Yolo Bypass. Future upstream control programs are planned for tributaries to the Delta through which control actions will be implemented to meet load allocations for tributary inputs assigned by the Delta control program.

The control program includes requirements to begin reducing total mercury loading to San Francisco Bay, as required by Resolution R2-2006-0052.

Margin of Safety: The Delta Mercury Control program includes an explicit margin of safety of 10%.

Compliance Date: Methylmercury load and waste load allocations for dischargers in the Delta and Yolo Bypass shall be met as soon as possible, but no later than 2030 (unless the Regional Board amends the allocations and extends the implementation schedule and final compliance date).

When implementing the wasteload allocations in this control program, the Regional Water Board may include schedules of compliance in NPDES permits for compliance with water quality-based effluent limits based on the wasteload allocations. The compliance schedules must be as short as possible, extend to no later than 2030, and must be consistent with the requirements of the Clean Water Act, EPA regulations at 40 CFR 122.476, and State law and regulations.

B. Implementation Program

Point Sources: The regulatory mechanism to implement the Delta Mercury Control Program for point sources shall be through NPDES permits. Each NPDES permit assigned a waste load allocation shall be reopened or amended at re-issuance, in accordance with applicable laws, to incorporate the applicable waste load allocations and interim limits as a permit requirement. NPDES permits shall contain performance-based mass interim limits for mercury and requirements for mercury minimization programs.

(--details will be provided by NPDES workgroup, need to include facilities and urban runoff)

The interim limits for point sources that apply prior to the final allocation compliance date shall be _____.

Urban runoff: For interim limits, MS4 dischargers listed in Table C shall implement best management practices to the maximum extent practicable to control erosion and sediment discharges containing mercury. The Sacramento MS4 (CAS082597), Stockton MS4 (CAS083470), and Tracy MS4 (CAS000004) permittees shall implement pollution prevention measures and best management practices to the maximum extent practicable to minimize total mercury discharges. These MS4s shall submit a mercury plan by [one year after the effective date of this Basin Plan amendment] for Executive Officer approval. The mercury plan shall include a description of the discharger's existing mercury control efforts, a description of all mercury sources contributing, or potentially contributing, to the mercury loading in MS4 discharges, and an analysis of potential prevention and control actions that could minimize mercury loading.

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Nonpoint Sources: Nonpoint sources shall be regulated through the authority contained in Water Code sections 13263 and 13269, and in conformance with the State Water Resources Control Board's Nonpoint Source Implementation and Enforcement Policy.

Compliance with load allocations will be determined by comparing subarea loads with the allocations. For subareas not in compliance with allocations, the Regional Water Board may develop load allocations for individual sources, and require individual monitoring and waste discharge requirements.

Mercury Control Studies

Point and nonpoint source dischargers shall conduct mercury and methylmercury control studies (**Control Studies**) to develop and evaluate management practices to control mercury and methylmercury discharges. The **Control Studies** shall be completed by [7 years after the effective date].

Point and nonpoint source dischargers may work together through an adaptive management approach to conduct the **Control Studies**. Organizing, planning, developing, and implementing the studies can be through a stakeholder approach through a memorandum of intent or other mechanism.

The Regional Water Board will use the study results and other information to amend relevant portions of the Delta Mercury Control Program during the Delta Mercury Control Program Review.

Regional Water Board staff will be involved with any discharger and stakeholder groups and science committees formed to conduct the **Control Studies** and work with dischargers and stakeholders to collaboratively design and evaluate the studies.

The Regional Water Board will form a technical advisory committee (TAC) to review any stakeholder **Control Studies**. The TAC will be comprised of independent experts that would convene as needed to provide technical peer review, advise the Board on technical issues, and provide recommendations for additional studies and implementation alternatives developed by the dischargers. The Board will form and manage the TAC with guidance and recommendations from the dischargers and stakeholders.

At a minimum, **Control Studies** shall develop methylmercury and/or mercury control methods; evaluate the effectiveness, costs, and potential environmental effects of identified control actions; and propose implementation activities schedules to comply with methylmercury allocations.

Methylmercury and total mercury **Control Studies** are required for:

- a. Irrigated agricultural lands, managed wetlands, and wetland restoration projects that discharge to the Yolo Bypass and Delta subareas that require methylmercury source reductions.
- b. Existing NPDES permitted facilities in the Delta and the Yolo Bypass (listed in Table B).
- c. Sacramento Area Municipal Separate Storm Sewer System (MS4), Stockton MS4, and Tracy MS4 service areas within and upstream of the legal Delta boundary.

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- d. New projects or changes to existing projects related to: flood conveyance, water management, and salinity control projects that have the potential to increase ambient mercury and/or methylmercury levels in the Delta or Yolo Bypass. State and federal agencies responsible for these studies include _____.

Proponents of new wetland and wetland restoration projects scheduled for construction after 2011 either shall participate in a comprehensive study plan as described above or shall implement a site-specific study plan, evaluate practices to minimize methylmercury discharges, and implement newly developed management practices as feasible. Wetland projects may include pilot projects to demonstrate which management practices minimize methylmercury discharges. Projects shall include monitoring to demonstrate effectiveness of management practices.

By [one year after the effective date], the dischargers shall enter into memorandum of intent (MOI) or similar document to address coordination and implementation of Mercury Control Studies and exposure reduction activities. The Executive Officer is authorized to enter into a MOI on behalf of the Regional Water Board.

The MOI shall include provisions requiring dischargers to develop methylmercury and/or mercury control methods; evaluate the effectiveness, costs, and potential environmental effects of identified control actions; and propose implementation activities schedules to comply with methylmercury allocations.

Mercury Control Studies Schedule

1. Progress report on the MOI: By (one year after the effective date of this amendment), the Stakeholder Group shall provide to the Regional Water Board a report that describes how individual dischargers or groups of discharger or coalitions will implement the **Control Studies**. For dischargers conducting coordinated studies, the report shall include a list of the dischargers that will participate in the study.
2. By [two years after the effective date of this amendment], dischargers, discharger groups, or entities representing dischargers, shall submit **Control Studies** work plans to the Regional Water Board. The work plans will contain a general description of all the studies that need to be done for the **Control Studies** and a detailed work plan for the work to be accomplished in the following two years. Regional Water Board staff and the TAC will review the work plans and provide recommendations for revising workplans if necessary. Final work plans will be approved by the Executive Officer.
3. By [four years after the effective date of this amendment], dischargers, or entities representing dischargers, shall submit a report to the Regional Water Board documenting progress towards complying with the study requirements and management practice development. The report shall include work plans for any additional studies needed to address methylmercury and total mercury characterization or control. The TAC may evaluate the scientific basis of the findings to date and recommend what additional studies should be undertaken to complete the objectives of the Control Studies. Staff will review the work plans and recommendations of the TAC and provide a progress report to the Regional Water Board.
4. By [seven years after the effective date of this amendment], the dischargers, or entities representing dischargers, shall complete the studies and submit to Regional Water

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Board staff a final report that presents the study results and descriptions of methylmercury control options, their preferred methylmercury controls, and implementation schedules for achieving methylmercury allocations.

Dischargers in the Central Valley that are not subject to the Delta Mercury Control Program but may be subject to future mercury control programs in upstream tributary watersheds should consider participating in the coordinated Delta mercury control studies. If such dischargers actively participate in the **Control Studies**, they may be exempt from conducting their own individual studies as part of any future upstream mercury control program.

Interim Progress Reports

Annually, staff shall report to the Regional Water Board progress of upstream TMDL development, discharger and stakeholder coordination and implementation of **Control Studies**, and actions implemented or proposed to meet TMDL load and waste load allocations, and the status of the formation and activities of the TAC.

By October 2014, the Executive Officer shall provide a comprehensive report to the Regional Water Board on the progress of upstream mercury control program development, **Control Studies**, and actions implemented or proposed to meet Delta Mercury Control Program load and waste load allocations, and the status and progress of the TAC, and recommendations for modifications to the Delta Mercury Control Program if progress is insufficient.

Delta Mercury Control Program Review

By October 2017 at a public hearing, and after a scientific peer review and public review process, the Regional Water Board shall reconsider the **Delta Mercury Control Program** and will consider modification of objectives, allocations, implementation provisions and schedules, and the final allocation compliance date. The Regional Water Board shall use any applicable new information and results of the **Control Studies** to adjust the relevant allocations and implementation requirements as appropriate.

If the Regional Water Board does not receive information to review and update the **Delta Mercury Control Program**, the program will not be changed. By October 2017 the Regional Water Board may consider requiring management plans and time schedules for meeting the allocations and compliance date or issuing waste discharge requirements.

Delta Mercury Control Program review will not exempt sources from allocations, but allocations may be adjusted based on the special studies and other information.

By [one year after the Board amends the Delta Mercury Control Program], but no later than October 2019, dischargers shall implement applicable mercury and methylmercury controls.

Compliance Monitoring

Beginning in 2028, methylmercury sources assigned load and waste load allocations shall monitor methylmercury loads and concentrations and report to the Regional Water Board compliance towards meeting applicable load or waste load allocations. Dischargers shall report the results to the Regional Water Board by October 2029. The point of compliance for waste load allocations for point sources shall be effluent discharge. The points of compliance for non-point sources shall determined during the **Control Studies**.

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Allocations and Requirements for State and Federal Agencies

Open water allocations are assigned jointly to the State Lands Commission and the Department of Water Resources.

Activities including changes to water management and storage in and upstream of the Delta, changes to salinity objectives, dredging and dredge materials disposal and reuse, and changes to flood conveyance flows are subject to the open water methylmercury allocations. Agencies responsible for these activities include Department of Water Resources, U.S. Bureau of Reclamation, and U.S. Army Corps of Engineers (USACE), and the State Water Resources Control Board. These agencies shall include requirements for projects under their authority to conduct **Control Studies** and implement methylmercury reductions as necessary to comply with the allocations by 2030.

The responsible parties should coordinate with wetland and agricultural landowners to characterize existing methylmercury discharges to open waters from lands immersed by managed flood flows and develop methylmercury control measures to control the increase produced by project changes.

The State Lands Commission and Department of Water Resources in coordination with the Regional Water Board shall conduct **Control Studies** and evaluate options to reduce methylmercury production in open waters under jurisdiction of the State Lands Commission. Evaluations shall include inorganic mercury reduction projects.

For development projects requiring Clean Water Act Section 404 permits that involve compensatory and/or mitigation wetlands, the USACE, U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration (NOAA) Fisheries, and California Department of Fish and Game shall ensure that replacement wetland projects comply with the allocations.

The State and Regional Water Boards should consider requiring project proponents to demonstrate the means of compliance with requirements of Delta Mercury Control Program as a condition of approval of any water right action or other project expected to increase methylmercury levels.

Requirements for Dredging and Dredge Material Disposal (placeholder)

Cache Creek Settling Basin Improvement Plan and Schedule

DWR, Central Valley Flood Protection Board, and USACE, in conjunction with landowners and other stakeholders, shall develop a coordinated plan and schedule for management of mercury-contaminated in the Cache Creek Settling Basin, including plans to implement improvements for decreased mercury discharges from the Cache Creek Settling Basin by [seven years after the effective date of this amendment].

1. By [two years after the effective date of this amendment], the agencies shall develop a strategy to reduce total mercury discharged from the basin and to provide long-term maintenance of the Settling Basin. The strategy shall include implementation schedules and evaluate funding options. The agencies shall work with the landowners within the Settling Basin and local communities affected by basin improvements.

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2. By [three years after the effective date of this amendment], the agencies shall submit a detailed plan for improvements to the basin to increase its sediment and mercury mass trapping efficiency to 75%.
3. By [five years after the effective date of this amendment], the agencies shall initiate control actions to reduce total mercury loads from the Cache Creek Settling Basin and complete project improvements by [seven years after the effective date of this amendment].

The agencies shall submit the strategy and planning documents described above to the Regional Water Board for approval by the Executive Officer.

Other Recommendations

Watershed stakeholders are encouraged to identify mercury/methylmercury reduction projects, and propose and conduct projects to reduce upstream non-point sources of methylmercury/mercury. The Regional Water Board supports these efforts and will recommend they be granted priority status when proponents apply for state and federal grants and other sources of funding.

The Regional Water Board recommends that dischargers subject to supplemental environmental projects to direct a portion of the penalties towards mercury/methylmercury reduction projects in their watersheds.

Pilot Mercury Offset Program and Early Implementation of Total Mercury Reduction Efforts

Develop guidance for mercury offset pilot program based on workgroup products, or have commitments and a schedule to develop an offset pilot program within two years.

Exposure Reduction Program (Needs Edits)

Methylmercury dischargers in the Delta and Yolo Bypass shall develop and implement effective programs to reduce mercury related risks and quantify risk reductions resulting from the risk reduction activities. This shall include activities that reduce actual and potential exposure of – and mitigate health impacts to – those people and communities most likely to be affected by mercury in Delta-caught fish. These requirements apply to the following entities:

- *Specific wastewater facilities listed on Table C (see footnote (c));*
- *Urban storm water agencies: Sacramento Area MS4 (CAS082597), Stockton Area MS4 (CAS083470), and Tracy MS4 (CAS000004); and*
- *Any government agencies proposing new wetland projects in the Delta or Yolo Bypass that have the potential to discharge methylmercury.*

Comment [MLW1]: How should this be identified in Table B?

The dischargers shall work with affected communities and the public health agencies to develop and implement an effective risk management program(s). Dischargers may work together to develop a program. The risk management program(s) should include the following activities:

- *Provide fish-consumption advice to the public in multiple languages and media forms, including identifying fish species that have relatively low levels of mercury;*

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- Regularly inform the public about monitoring data and findings regarding hazards of eating mercury-contaminated fish;
- Perform special studies as needed to support health risk assessment and risk communication; and
- Plan and implement as feasible ways to address public health impacts of mercury in Delta fish, including activities that reduce the actual and potential exposure of and mitigate health impacts to those people and communities most likely to be affected by mercury in Delta fish, such as subsistence fishers and their families.

The methylmercury dischargers shall submit a risk management workplan for Executive Officer approval by [two years after the effective date of this amendment], and implement the plan by [four years after the effective date of this amendment]. Every three years thereafter, the dischargers shall provide a progress report to the Regional Water Board.

The California Department of Health Services and the local county health departments should develop and promote public education programs and work with at-risk fish consumers to develop risk management activities.

Atmospheric Deposition

USEPA, the State Water Board, and the Air Resources Board should develop a memorandum of understanding to conduct studies to evaluate local and statewide mercury air emissions and deposition patterns and to develop a load reduction program(s).

Monitoring

The monitoring guidance for the Delta is described in Chapter V, Surveillance, and Monitoring.

Exceptions for Low Threat Discharges

Discharges subject to a waiver of waste discharge requirements based on a finding that the discharges pose a low threat to water quality, except for discharges subject to water quality certifications, are exempt from the mercury requirements of this Delta Mercury Control Program.

Discharges subject to waste discharge requirements for dewatering and other low threat discharges to surface waters are exempt from the mercury requirements of this Delta Mercury Control Program.

Recommendations for Other Agencies

For development projects requiring Clean Water Act Section 404 permits that involve compensatory and/or mitigation wetlands, the USACE, USFWS, NOAA Fisheries, and CDFG should ensure that replacement wetland projects will be consistent with load allocations.

The State Water Board should consider requiring methylmercury controls for new water management activities that are found to increase ambient methylmercury levels as a condition of approval of any water right action required to implement the project. The State Water Board Division of Water Rights should consider requiring the evaluation and implementation of feasible management practices to reduce or, at a minimum, prevent methylmercury ambient levels from increasing from changes to water management activities and flood conveyance projects. The State Water Board should consider funding or

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conducting studies to develop and evaluate management practices to reduce methylmercury production resulting from existing water management activities or flood conveyance projects.

During future reviews of the salinity objectives contained in the Bay-Delta Plan, the State Water Board Division of Water Rights should consider conducting studies to determine if methylmercury production in the Bay-Delta is a function of sulfate concentrations. Furthermore, the State Water Board should consider the results of these studies in evaluating changes to the salinity objectives.

The State should establish the means to fund a portion of the mercury control projects in the Delta and from upstream watersheds.

Revise Chapter IV (Implementation), under “Estimated Costs of Agricultural Water Quality Control Programs and Potential Sources of Financing” to add:

Delta Mercury Control Program

The total estimated costs (2007 dollars) for the agricultural methylmercury characterization and control studies to develop management practices to meet the Delta methylmercury objectives range from \$430,000 to \$820,000. The estimated annual costs for agricultural discharger compliance monitoring range from \$14,000 to \$25,000. The estimated annual costs for Phase 2 implementation of methylmercury management practices range from \$500,000 to \$1.1 million.

Potential funding sources include:

- 1. Those identified in the San Joaquin River Subsurface Agricultural Drainage Control Program and the Pesticide Control Program.

Revise Chapter IV (Implementation), under “Mercury Discharges in the Sacramento River and San Joaquin River Basins”, under subsection “Cache Creek Watershed Mercury Program” to delete the last line in Table IV-6.1, ‘Cache Creek Settling Basin Outflow’ and to delete Footnote ‘(c)’.

Revise Chapter V (Surveillance and Monitoring) to add:

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Fish methylmercury compliance monitoring. The Regional Water Board will use the following specifications to determine compliance with the methylmercury fish tissue objectives in the Sacramento-San Joaquin Delta. Regional Water Board staff will initiate fish tissue monitoring five years after dischargers implement projects to reduce methylmercury and total mercury discharges. Compliance monitoring will ensue every ten years thereafter. Initial fish tissue monitoring will take place at the following compliance reaches in each subarea:

- Central Delta subarea: Middle River between Bullfrog Landing and Mildred Island;
- Marsh Creek subarea: Marsh Creek from Highway 4 to Cypress Road;
- Mokelumne/Cosumnes River subarea: Mokelumne River from the Interstate 5 bridge to New Hope Landing;
- Sacramento River subarea: Sacramento River from River Mile 40 to River Mile 44;
- San Joaquin River subarea: San Joaquin River from Vernalis to the Highway 120 bridge;
- West Delta subarea: Sacramento/San Joaquin River confluence near Sherman Island;
- Yolo Bypass-North subarea: Tule Canal downstream of its confluence with Cache Creek; and
- Yolo Bypass-South subarea: Toe Drain between Lisbon and Little Holland Tract.

Compliance fish methylmercury monitoring will include representative fish species for comparison to each of the methylmercury fish tissue objectives:

- Trophic Level 4: bass (largemouth and striped), channel and white catfish, crappie, and Sacramento pikeminnow.
- Trophic Level 3: American shad, black bullhead, bluegill, carp, Chinook salmon, redear sunfish, Sacramento blackfish, Sacramento sucker, and white sturgeon.
- Small (<50 mm) fish: primary prey species consumed by wildlife in the Delta, which may include the species listed above, as well as inland silverside, juvenile bluegill, mosquitofish, red shiner, threadfin shad, or other fish less than 50 mm.

Trophic level 3 and 4 fish sample sets will include three species from each trophic level and will include both anadromous and non-anadromous fish. Trophic level 3 and 4 fish sample sets will include a range of fish sizes between 150 and 500 mm total length. Striped bass, largemouth bass, and sturgeon caught for mercury analysis will be within the CDFG legal catch size limits. Sample sets for fish less than 50 mm will include at least two fish species that are the primary prey species consumed by wildlife at sensitive life stages. In any subarea, if multiple species for a particular trophic level are not available, one species in the sample set is acceptable.

Water Methylmercury and Total Mercury Compliance Monitoring. *Unfiltered methylmercury samples shall be analyzed, at a minimum, with a method detection limit (MDL) of 0.02 ng/l and minimum reporting level (ML) of 0.05 ng/l. Unfiltered total mercury samples shall be analyzed, at a minimum, with a MDL of 0.2 ng/l and ML of 0.5 ng/l. Minimum reporting levels are equivalent to the lowest calibration standards for*

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methylmercury and total mercury, 0.05 and 0.5 ng/l at a minimum, respectively. For measurements between the ML and MDL, one half the ML shall be used in average and 90th percentile concentration and load calculations. For measurements less than the MDL, one half the MDL shall be used in average and 90th percentile concentration and load calculations. Alternate statistical methods of addressing measurements less than the ML or MDL may be utilized with Executive Officer approval.

Compliance points for irrigated agriculture and managed wetlands methylmercury allocations shall be developed during the **Control Studies**.

NPDES facilities' compliance points for methylmercury and total mercury monitoring are the effluent monitoring points currently described in individual NPDES permits. Facilities listed in Table B that discharge greater than one million gallons per day (1 mgd) shall conduct monitoring once per month, at a minimum; facilities that discharge less than 1 mgd shall conduct quarterly monitoring, at a minimum. Effluent monitoring is not required when there is no discharge to surface water. Monitoring frequency for facilities with episodic discharges (e.g., those that discharge to surface water only during large storm events) those wet and dry weather sampling periods currently described in the facilities' NPDES permits or otherwise determined to be representative of the facilities' discharges and approved by the Executive Officer on a permit-specific basis. Heating/cooling and power facilities shall conduct concurrent monitoring of their intake water and effluent discharge. All facilities listed in Table B shall monitor methylmercury. Facilities required to implement total mercury evaluation and minimization programs (Table _____) ~~also shall monitor total mercury.~~ Facilities that begin discharging to surface water prior to [seven years after the effective date], and facilities for which effluent methylmercury data were not available at the time Table B was compiled, shall conduct monitoring and interim limits for inorganic mercury set equal to _____. Annual average (January-December) total mercury and methylmercury concentrations for each year shall be the average of monthly averages. Monthly averages are the mean of all concentration data collected during a given month.

Comment [MLW2]: This has not been identified in any updated table.

Compliance points and monitoring frequency for MS4s required to conduct methylmercury and total mercury monitoring are those locations and wet and dry weather sampling periods currently described in the individual MS4 NPDES permits or otherwise determined to be representative of the MS4 service areas and approved by the Executive Officer on an MS4-specific basis.

Annual methylmercury loads in urban runoff in MS4 service areas may be calculated by the following method or by an alternate method approved by the Executive Officer. The annual methylmercury load in urban runoff for a given MS4 service area during a given year may be calculated by the sum of wet weather and dry weather methylmercury loads. To estimate wet weather methylmercury loads discharged by MS4 urban areas, the average of wet weather methylmercury concentrations observed at the MS4's compliance locations may be multiplied by the wet weather runoff volume estimated for all urban areas within the MS4 service area. To estimate dry weather methylmercury loads, the average of dry weather methylmercury concentrations observed at the MS4's compliance locations may be multiplied by the estimated dry weather urban runoff volume in the MS4 service area.

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