Change Sheet for the Ballona Creek Metals TMDL Basin Plan Amendment Language

Page	Action	Added or Deleted Text	Reason for Change.
	Correct	Correct minor typographical errors throughout the BPA and Staff Report.	For clarification.
1, Title	Delete	~~and Ballona Creek Estuary~~	To correct the title to reflect that the TMDL only addresses impairments in Ballona Creek.
4	Delete	Wet-weather loading capacities are ~~based on load duration curves. Loading capacities are~~ calculated by multiplying the daily storm volume by the wet-weather numeric target for each metal. ~~The resulting curves identify the allowable load for a given flow.~~	To clarify that curves are not presented in the loading capacity section. This is a change from the first draft of the TMDL and is in response to comments that the load duration curves were confusing.
4	Delete	Load Capacity ~~Duration Curves~~	Consistent with the previous change
5, 7	Add and delete	Concentration-based dry-weather waste load allocations are assigned to the minor <u>NPDES permits</u> and general <u>non-storm water</u> NPDES permits ~~(other than storm water permits)~~ that discharge to Ballona Creek or its tributaries.	Clarification
6	Add	<u>Wet-weather waste load allocations for the grouped storm water permittees apply to all reaches and tributaries</u>.	This is to clarify that because all reaches and tributaries drain to Reach 1 in wet-weather, all reaches and tributaries must receive wet-weather waste load allocations.
6	Delete and add	<u>Each</u> storm water permittee enrolled under the general construction or industrial storm water permits will receive an individual waste load	Clarification

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		allocation on a per acre basis, based on the acreage of their ~~individual construction or industrial~~ facility.	
8, 14	Delete and add	~~Non Storm Water General (non storm water) and~~ Minor NPDES ~~Permits (including minor and general permits)~~ and General Non-Storm Water NPDES Permits	Clarification
8, 14	Add	Permittees that hold individual NPDES permits and solely discharge storm water may be allowed (at Regional Board discretion) compliance schedules up to 10 years from the effective date of the TMDL to achieve compliance with final WLAs.	This allows individual NPDES permits for storm water the same compliance period as the general storm water permits. This change acknowledges staff's intent to enroll many of the individual NPDES permits for storm water into the watershed-specific general storm water permit, upon adoption of the general permit.
8, 14	Delete	"~~and construction~~" after industrial	The Revised Basin Plan amendment describes requirements for industrial stormwater permits and construction stormwater permits in separate sections. Requirements for general construction stormwater permits are described under a separate heading beginning on page 9.
8	Add	Dry-weather Implementation	This language is added in response to comments and to

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		Non-storm water flows authorized by Order No. 97-03 DWQ, or any successor order, are exempt from the dry-weather waste load allocation equal to zero. Instead, these authorized non-storm water flows shall meet the concentration-based waste load allocations assigned to the other NPDES Permits. The dry-weather waste load allocation equal to zero applies to unauthorized non-storm water flows, which are prohibited by Order No. 97-03 DWQ.	recognize that dry-weather flows are already regulated by the general permit. One of the general permit conditions is that the discharge may not contribute to an exceedance or violation of water quality standards. Assigning the same dry-weather WLAs as the "other NPDES permits" to these dry-weather flows provides insurance that the flows will not contribute to or cause an exceedance of CTR.
8	Delete	It is anticipated that the dry-weather waste load ~~equal to zero~~ allocations will be implemented by requiring improved best management practices (BMPs) to eliminate the discharge of non-storm water flows.	This change is in conformance with the above-mentioned change.
8	Add	<u>"Wet-weather Implementation" heading</u>	For better organization.
8, 12	Move	The general storm water permits shall contain a model monitoring and reporting program to evaluate BMP effectiveness. A permittee enrolled under the general permits shall have the choice of conducting individual monitoring based on the model program or participating in a group monitoring effort. MS4 permittees are encouraged to take the lead in group monitoring efforts for industrial facilities under their jurisdiction because compliance with waste load allocations by these facilities will in many cases	This text was cut from page 8 and inserted into page 12 for better organization.

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		translate to reductions in metals loads to the MS4 system.	
9	Replace	In the first five years from the effective date of the TMDL, interim waste load allocations will not be interpreted as enforceable permit conditions ~~limits~~.	This is in response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.
9	Delete	Interim Wet-Weather WLAs for General Industrial ~~and Construction~~ Storm Water Permittees (total recoverable metals)	To reflect that these interim WLAs do not apply to the Construction Storm Water Pemittees
9	Add	Add underline text: "It is anticipated that monitoring results and any necessary BMP improvements would occur as part of an annual reporting process."	This reflects staff intent that the iterative BMP process should occur at a regular frequency within the permit cycle.
9	Add	Add underline text: "Compliance with permit conditions may be demonstrated through the installation, maintenance, and monitoring of Regional Board-approved BMPs. If this method of compliance is chosen, permit writers must provide adequate justification and documentation to demonstrate that BMPs are expected to result in attainment of interim waste load allocations."	This is in response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.
9	Replace	Delete strikethrough text: " ~~In addition, permittees shall begin an iterative BMP process to meet final waste load allocations. Concentration-based permit limits may be set to achieve the mass-based waste load allocations. These concentration-based limits would be equal to the concentration-based waste load allocations assigned to the other NPDES permits. Permittees~~	This is response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.

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		~~shall comply with final waste load allocations no later than 10 years from the effective date of the TMDL.~~" Replace with underline text: "The general industrial storm water permits shall achieve final wet-weather waste load allocations no later than 10 years from the effective date of the TMDL, which shall be expressed as NPDES water quality-based effluent limitations. Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs if adequate justification and documentation demonstrate that BMPs are expected to result in attainment of waste load allocations."	
9, 10	Add	Add new heading: "General Construction Storm Water permits" and new implementation language for dry- and wet-weather waste load allocations.	This is in response to comments about the short timeframe and high turnover of construction projects. The added language recognizes that industry-wide compliance efforts are better than a site-specific BMP and monitoring program to address these short-term projects.
14	Add and delete	Under "General Industrial Storm Water Permits", second and third rows, add underline, delete strikethrough: "Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs. Permittees shall begin to install and	This is response to comments and in order to clarify intent that wet-weather interim WLAs will be implemented as BMPs,and to clarify that the iterative BMP process to meet final waste load

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		test BMPs to meet interim wet-weather WLAs. BMP effectiveness monitoring will be implemented to determine progress in achieving interim wet-weather to achieve waste load allocations~~.~~	allocations begins five years from the effective date of the TMDL.
14 and 15	Add and delete	**5 years after the effective date of the TMDL** Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs. Permittees shall ~~allow~~ begin an iterative BMP process including BMP effectiveness monitoring to achieve compliance with ~~permit requirements~~ final wet-weather WLAs.	This is response to comments and in order to clarify intent that wet-weather WLAs will be implemented as BMPs and to clarify that the iterative BMP process to meet final waste load allocations begins five years from the effective date of the TMDL.
15	Add and delete	**10 years after the effective date of the TMDL** Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs. ~~Permits shall allow iterative BMP process including BMP effectiveness monitoring to achieve compliance with permit requirements.~~	This is in response to comments and in order to clarify intent that final wet-weather WLAs may be implemented as Board-approved BMPs.
15	Add	Add new heading: "General construction storm water permits" and new implementation language for dry and wet-weather waste load allocations.	This is in response to comments about the short timeframe and high turnover of construction projects. The added language recognizes that industry-wide compliance efforts are better than a site-specific BMP and monitoring program to address these short-term projects. Note this requirement would require

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			construction industry to comply with final waste load allocations by implementing Regional-Board approved BMPs, within 7 years after the effective date of the TMDL.
15	Replace	Replace “6 months” with “12 months” in first row under MS4 and Caltrans Storm Water Permits.	In response to comments to extend the deadline for the monitoring program.
16	Replace	Replace “12 months” with “18 months” and “16 months” with “24 months” in second row under MS4 and Caltrans Storm Water Permits.	In response to comments to extend the deadline for an implementation plan.