

Proposed Additions and/or Edits are Highlighted in **yellow**. Deletions are in Strikethrough.

1 Proposed Change

Part 1, B.3 p.2

Stated: ~~natural watercourses~~

Correction: **receiving waters**

2 Proposed Change:

Part 1, D.3 p. 9

Stated: ~~watercourses~~

Correction: **receiving waters**

3 Proposed Change

Part 1- New LID Finding, B. 19

Stated: New insert

Correction: Staff finds there is a growing acceptance by stormwater professionals to integrate LID principles into stormwater management programs and MS4 permits. However, there remains significant controversy regarding the appropriate requirements and metrics for LID. At the heart of this controversy is a dispute regarding the feasibility and effectiveness of requiring a fixed volume of stormwater to be captured and retained onsite for infiltration, reuse, and evapotranspiration, as opposed to permitting a portion of the stormwater to be released off site after it is treated, when it is infeasible to retain the required stormwater on site due to site specific conditions.

Staff has reviewed extensive technical literature regarding this issue (e.g. R. Horner, *Investigation of the Feasibility and Benefits of Low-Impact Site Design Practices ("LID") for Ventura County* (February 2007); E.Strecker, A.Poresky, D. Christsen, *Memorandum: Rainwater Harvesting and Reuse Scenarios and Cost Consideration*, (April, 2009). Staff finds that there is consensus in the technical community that site conditions and the type of development can limit the feasibility of retaining, infiltrating, and reusing stormwater at sites due to a variety of site specific conditions. Factors that affect the feasibility of a fixed volume capture standard include, but are not limited to: soils infiltration capacity, subsurface pollution, and locations in urban core centers.

Regarding the effects of capturing a fixed stormwater volume on site, Staff finds the fixed volume approach may be ignoring basic hydrological principles that relate the feasible infiltration volume to the infiltration capacity of local soils. Requirements to capture a fixed volume on site could disturb the natural water balance and lead to unintended engineering and hydrologic consequences. For example, a typical hydrological condition in Ventura County is one of successive storms during the winter which may exceed the stormwater capacity that can be retained on site. This may result in ponded water on site with attendant health and safety risks, saturation of the near surface soils, and reduction of water resources in Regional waterbodies. These effects could damage site structures, increase groundwater pollution by forcing enhanced pollution spreading, or destroy aquatic habitat. Staff finds these reasonably potential effects are not well evaluated scientifically. Finally, staff cannot find that a fixed retention volume versus a

standard that attempts to release surface flows at a predevelopment level would result in a greater reduction of stormwater pollution.

4 Proposed Change

Part 1- Discharge Prohibitions A.1(c)

Stated:

Correction: A.1.(c)(2) was moved to A.1(c), the word “emergency” was eliminated

5 Proposed Change

Part 1- Table 1

Correction: Requirements from firefighting activity flows have been eliminated.

6 Proposed Change

Part 1- A.1.

Stated: ~~watereourses~~

Correction: **receiving waters**

7 Proposed Change

Part 1 – Discharge Prohibitions, A.1.c.(3)(I), Pg.30 -

Stated: Pooled storm water from treatment BMPs¹.

Correction: Pooled **non-**storm water from treatment BMPs

*Footnote 1 is not associated with this item. Footnote 2 has been reworded and combined with the previous draft permit’s footnote 3, which was associated with the item. Footnote appears to be in need of a change.

8 Proposed Change

Part 1 – Discharge Prohibitions, Table 1, Pg.30 -

Stated: Discharges from potable water sources⁺. ~~See Footnote 1~~

Correction: Delete footnote at the end of sources.

*Footnote 1 is not associated with this item. Footnote 2 has been reworded and combined with the previous draft permit’s footnote 3, which was associated with the item. Footnote appears to be in need of a change or deletion.

9 Proposed Change

Part 1 – Discharge Prohibitions, Footnote 2, Pg.30 -

Stated: All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer, and designed to drain within ~~72~~ hours of the end of a rain. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.

Correction: All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer, and designed to drain within **XX** hours of the end of a rain. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.

10 Proposed Change

Part 1 – Discharge Prohibitions, Footnote 1, Pg.31 -

Stated: The term applies to low volume, incidental and infrequent releases that are innocuous from a water quality perspective. Those releases for dewatering or hydro-testing or flushing of water supply and distribution mains and incidental and infrequent releases from well heads shall be allowed with the implementation of appropriate BMPs until such time as a new General Permit is adopted that addresses those types of releases. Discharges from hydrostatic pipe testing shall be subject to separate NPDES general permit coverage (CAG674001) and discharges from utility vaults shall be conducted under coverage of a separate NPDES permit specific to that activity.

Correction: Delete Footnote 1. There appears to be no Footnote in Table on Page 31.

11 Proposed Change

Part 1 – Discharge Prohibitions, Footnote 2, Pg.33 -

Stated: All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer, and designed to drain within 72 hours of the end of a rain. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.

Correction: All storm water BMPs shall at a minimum be maintained at a frequency as specified by the manufacturer, and designed to drain within XX hours of the end of a rain. Storm water treatment BMPs may be drained to the MS4 under this Order if the discharge is not a source of pollutants. Sediments shall be disposed of properly, in compliance with all applicable local, state, and federal policies, acts, laws, regulations, ordinances, and statutes.

12 Proposed Change

Part 2 Municipal Action Levels, Page 34,

The following language will be inserted as the new paragraph 6:

Upon Executive Officer approval, Permittees may coordinate MAL Action Plans and TMDL Implementation Plans, subject to the compliance timeline of the earliest date.

13 Proposed Change

Part 4.A.3, Page 36

Current Language: Each Permittee shall require that treatment control BMPs being implemented under the provisions of this Order shall be designed, at a minimum, to achieve the BMP performance criteria for storm water pollutants likely to be discharged as identified in Attachment “C”, Table 3.

Revised Language: Each Permittee shall require that treatment control BMPs being implemented under the provisions of this Order shall be designed, at a minimum, to achieve the BMP performance criteria for storm water pollutants likely to be discharged as identified in Attachment “C”, Table 3 for an 85th percentile 24-hour runoff event determined as the maximized capture storm water volume for the area using a 48 to 72-hour draw down time, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998). Expected BMP pollutant removal performance for effluent quality was developed from the WERF-ASCE/ U.S. EPA International BMP Database.

14 Proposed Change

Part , 1.(a)(2),1.(a)(4), 1(a)(5), 1(a)(8)

Stated:

Correction: the word “impervious” was stricken from these sections

15 Proposed Change

Part 5 – Special Provisions (Baseline), E. Planning and Land Development Program,
III. New Development/Redevelopment Performance Criteria, 1(b)., Pg.55 -

Stated: ... For redevelopment projects, or development projects that can be demonstrated that the 5% EIA goal is infeasible, the project shall comply with the surface discharge requirements of 5.E.III.4

Correction: For redevelopment projects, or development projects that can be demonstrated that the 5% EIA goal is infeasible, the project shall comply with the surface discharge requirements of 5.E.III.43.

16 Proposed Change

Part 5 – Special Provisions (Baseline), E. Planning and Land Development Program,
III. New Development/Redevelopment Performance Criteria, 1(b)., Pg.56 -

Stated: All features structured constructed to render impervious surfaces “ineffective” as described in provision (b), above, shall be properly sized to infiltrate or store for beneficial reuse at least the volume of water that meets the criteria in subpart 5.E.III.3.

Correction: All features ~~structured~~ constructed to render impervious surfaces “ineffective” as described in provision (b), above, shall be properly sized to infiltrate or store for beneficial reuse at least the volume of water that meets the criteria in subpart 5.E.III.3.

17 Proposed Change

5.E.III.2.(a)(1)(F)

Correction: described in subpart 5.E.III.3(a)(3)(A)

18 Proposed Change

Part 5E.III.2.(3)

Stated:

Correction: “described in subpart 5.E.III.3(a)(4) below...”

19 Proposed Change

Part 5, E.III.2.(a)(5) p.58

Correction: Alternatively, the Co-Permittees may revise the Ventura County Technical Guidance Manual for Stormwater Quality Control Measures to address projects that disturb more than 50 acres.

20 Proposed Change

p. 59

Stated: added language

Correction: The HCP shall be deemed in effect upon Executive Officer approval.

21 Proposed Change

Part 5. E.IV.4.(a) p.63

Stated: The Principal Permittee or a coalition of Permittees shall create a ~~management~~ framework to fund regional or subregional solutions to storm water pollution, where any of the following situations occur:

Correction: The Principal Permittee or a coalition of Permittees shall create a **Mitigation Funding Plan** to fund regional or subregional solutions to storm water pollution, where any of the following situations occur:

22 Proposed Change

Part 5.E.IV.4.(a)(5) p.63

Stated: new section

Correction: When a Permittee determines that a project is infeasible in accordance with 5.(E).III.(1)(c), the project application shall provide sufficient funds to the Permittee for a public project that will retain or mitigate a volume of stormwater equivalent to the onsite retention volume that was not retained on site.

23 Proposed Change

p.63

Stated: new language

Correction: The Permittees shall submit the Mitigation Funding Plan to the Executive Officer for approval 445 days after Permit adoption. The Mitigation Funding Plan shall be deemed in effect upon Executive Officer approval.

24 Proposed Change

p.64

Stated: new language

Correction: The Permittees shall submit revisions to the Ventura County Technical Guidance Manual to the Regional Board for Executive Officer approval.

25 Proposed Change

Part 5- E.V.6.(3) p.70, E.V.6.(11) p.71

Stated: watercourses

Correction: receiving waters

26 Proposed Change

Part 5 – Special Provisions (Baseline), G. Public Agency Activities Program, I., Pg.74 -

Stated: viii. Public Industrial Activities Management

x. Infrastructure Maintenance

Correction: Either delete items viii. and x. in the list, or include section viii. Public Industrial Activities Management and section x. Infrastructure Maintenance within the program.

25 Proposed Change

Part 5- 6.(b)(1)(C), 6.(b)(1)(K) p. 81

Stated: watercourses

Correction: receiving waters

27 Proposed Change

Part 6- TMDL

Corrections:

Add the following language to Section III of Part 6 of the Order and renumber the section accordingly. Additions are underlined.

1. TMDL for Nutrients for Malibu Creek Watershed (Effective date: March 21, 2003)
2. TMDL for Nitrogen Compounds and Related Effects in Calleguas Creek (Effective date: July 16, 2003)
3. TMDL for Nitrogen Compounds for the Santa Clara River (Effective date: March 23, 2004).
4. TMDL for Chloride in Santa Clara River, Reach 3 (Effective date: June 18, 2003)
5. TMDL for Chloride in Upper Santa Clara River (Effective date: May 4, 2005)
6. TMDL for Toxicity, Chlorpyrifos and Diazinon in the Calleguas Creek, its Tributaries and Mugu Lagoon - (Effective date: March 24, 2006).
7. TMDL for Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation in Calleguas Creek, its Tributaries and Mugu Lagoon (Effective date: March 24, 2006).
8. TMDL for Bacteria in Malibu Creek and Lagoon (Effective date: January 24, 2006).
9. TMDL for Metals and Selenium in the Calleguas Creek, its Tributaries and Mugu Lagoon (Effective date: March 26, 2007)
10. TMDL for Trash in Revolon Slough and Beardsley Wash (Effective date: March 6, 2008).
11. TMDL for Boron, Chloride, Sulfate, and TDS in Calleguas Creek Watershed (Effective date: December 2, 2008)
12. TMDL for Trash in the Ventura River Estuary (Effective date: March 6, 2008).
13. TMDL for Bacteria in Harbor Beaches of Ventura County (Effective date: September 23, 2008).

28 Proposed Change

Part 6- TMDL

Correction: Add the following language to Section IV of Part 6 of the Order and renumber the section accordingly. Additions are underlined.

- “
1. Final Wet Weather Bacteria WLAs for Malibu Creek and Lagoon – (Compliance date: January 24, 2016).
 2. Final Chloride WLAs for Upper Santa Clara River – (Compliance date: May 4, 2016)
 3. Final Organochlorine Pesticides, Polychlorinated Biphenyls, and Siltation WLAs for Calleguas Creek, its Tributaries and Mugu Lagoon – (Compliance date: March 24, 2026).
 4. Final Metals and Selenium WLAs for Calleguas Creek, its Tributaries and Mugu Lagoon (Compliance date: March 26, 2022).
 5. Final Boron, Chloride, Sulfate, and TDS WLAs for Calleguas Creek watershed (Compliance date: December 2, 2023).”

29 Proposed Change

Part 6- TMDL

Correction: Add the following language to Section V of Part 6 of the Order and renumber the section accordingly. Additions are underlined.

“1. TMDL for Nutrients for Malibu Creek Watershed

(a) Summer Load Allocations

	<u>Nitrogen</u> <u>(lbs/day)</u>	<u>Phosphorus</u> <u>(lbs/day)</u>
- <u>Runoff from developed areas</u>	26	2.6
- <u>Golf Course Fertilization</u>	37	6.6
- <u>Dry Weather Urban Runoff</u>	52	4.6
- <u>Other</u>	56	4.1

(b) Winter concentration-based Load Allocations

	<u>Nitrogen (Nitrate-N + Nitrite-N)</u> <u>(mg/L)</u>
- <u>Runoff from Developed Areas</u>	8
- <u>Golf Course Fertilization</u>	8
- <u>Dry Weather Urban Runoff</u>	8
- <u>Other</u>	8

(a) Compliance Monitoring:

This TMDL was established and approved by U.S. EPA and did not include an implementation plan.

(b) Actions and Special Studies required for Malibu Creek MS4 permittees

(1) Extent of algal impairment. EPA recommends studies to investigate the current extent of impairment due to excessive algal growth in the creek by surveying algal biomass and species composition at multiple sites within the creek.

(2) Limiting factor analysis. EPA recommends further study to assess whether total nitrogen or total phosphorus or other parameters such as flow and light limit algal growth in the Malibu Creek watershed.

(3) Fate of nutrients in Malibu Lagoon. EPA recommends this special study to determine if the expected upstream reductions in nutrient loadings would result in desired improvements in water quality in the lagoon.

2. TMDL for Nitrogen Compounds and Related Effects in Calleguas Creek Watershed

The stormwater permitted discharges were considered minor sources of nitrogen to the Calleguas Creek. Therefore, WLAs are not assigned to storm water permitted discharges. The monitoring program of this TMDL includes data collection to quantify loadings and associated WLAs from these sources.”

30 Proposed Change

Part 6- TMDL

Correction: Add the following language to Section V of Part 6 of the Order and renumber the section accordingly. Additions are underlined.

“4. TMDL for Chloride in Santa Clara River, Reach 3

(a) Waste Load Allocation:

MS4 permittees discharging to Santa Clara River, Reach 3 shall implement BMPs to achieve the following MS4 WLAs:

Chloride (mg/L) _____ 80

(b) Compliance Monitoring: This TMDL was established and approved by U.S. EPA and did not include an implementation plan.

(c) Actions and Special Studies required of Santa Clara MS4 permittees:

(1) Annual Progress Reports. Santa Clara River MS4 permittees, either independently or in conjunction with other stakeholders, shall submit an annual progress report with respect to achievement of the WLAs.

5. TMDL for Chloride in Upper Santa Clara River

(a) Waste Load Allocation:

MS4 permittees discharging to Upper Santa Clara River shall implement BMPs to achieve the following WLAs

Chloride (mg/L) _____ 100

(b) Compliance monitoring:

(1) Compliance with the WLAs is to be determined through receiving water monitoring conducted in accordance with the Santa Clara River Nitrogen TMDL Monitoring Program approved by the Executive Officer.

(2) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports and Implementation Plans. Following these actions, Regional Water Board staff will evaluate the need for further enforcement action.

(c) Actions and Special Studies required of Santa Clara MS4 permittees:

(1) Annual Progress Reports. Santa Clara River MS4 permittees, either independently or in conjunction with other stakeholders, shall submit an annual progress report with respect to achievement of the WLAs.”

31 Proposed Change

Part 6- TMDL

Correction: Add the following language to Section V of Part 6 of the Order and renumber the section accordingly. Additions are underlined.

“12. TMDL for Boron, Chloride, Sulfate and TDS in Caleguas Creek Watershed

(a) Waste Load Allocation

(1) Interim Dry Weather WLAs for Permitted Stormwater Dischargers

<u>Constituent</u>	<u>Interim Limit</u> <u>30-day average (mg/L)</u>
<u>Boron Total</u>	<u>1.3</u>
<u>Chloride Total</u>	<u>230</u>
<u>Sulfate Total</u>	<u>1289</u>
<u>TDS Total</u>	<u>1720</u>

(2) Final Dry Weather WLAs for Permitted Stormwater Dischargers

<u>Subwatershed</u>	<u>Critical Condition Flow Rate (mgd)</u>	<u>Chloride Allocation (lb/day)</u>	<u>TDS Allocation (lb/day)</u>	<u>Sulfate Allocation (lb/day)</u>	<u>Boron Allocation (lb/day)</u>
<u>Simi</u>	<u>1.39</u>	<u>1,738</u>	<u>9,849</u>	<u>2,897</u>	<u>12</u>
<u>Las Posas</u>	<u>0.13</u>	<u>157</u>	<u>887</u>	<u>261</u>	<u>N/A</u>
<u>Conejo</u>	<u>1.26</u>	<u>1,576</u>	<u>8,931</u>	<u>2,627</u>	<u>N/A</u>
<u>Camarillo</u>	<u>0.06</u>	<u>72</u>	<u>406</u>	<u>119</u>	<u>N/A</u>
<u>Pleasant Valley (Calleguas)</u>	<u>0.12</u>	<u>150</u>	<u>850</u>	<u>250</u>	<u>N/A</u>
<u>Pleasant Valley (Revolon)</u>	<u>0.25</u>	<u>314</u>	<u>1,778</u>	<u>523</u>	<u>2</u>

(b) Compliance Monitoring

(1) A monitoring plan will be submitted to the RWQCB for Executive Officer approval on June 2, 2009. Monitoring will begin one year after Executive Officer approval of the monitoring plan to allow time for the installation of automated monitoring equipment.

(2) Compliance with the WLAs is to be determined through the measurement of in-stream water quality at the base of each of the Calleguas Creek subwatersheds, in accordance with the Calleguas Creek Watershed TMDL Monitoring Program approved by the Executive Officer.

(3) If any WLA is exceeded at a compliance monitoring site, permittees shall implement BMPs in accordance with the TMDL Technical Reports, Implementation Plans or as identified as a result of TMDL special studies identified in the Basin Plan Amendment. Following these actions, Regional Water Board staff will evaluate the need for further enforcement action.

(c) Actions and Special Studies required of Calleguas Creek Watershed MS4 permittees

Responsible jurisdictions including MS4 permittees shall submit compliance monitoring plan to the Los Angeles Regional Board for Executive Officer approval on June 2, 2009. Monitoring shall begin monitoring as outlined in the approved monitoring plan six months after approval of the work plan.

Responsible jurisdictions including MS4 permittees shall demonstrate that implementation actions have reduced the boron, sulfate, TDS, and chloride imbalance by 20%, 40%, 70% by December 2 of 2011, 2015, and 2018 respectively. Stormwater dischargers shall achieve WLAs, which shall be expressed as NPDES mass-based limits specified in accordance with federal regulations and state policy on water quality control by December 2, 2023.”

26 Proposed Change

Part 6- III, p.86

Stated: New section

Correction: The Permittee shall comply with the following Wasteload Allocations, consistent with the assumptions and requirements of the Wasteload Allocations documented in the Implementation Plans, including compliance schedules, associated with the State adoption and approval of the TMDL at compliance monitoring points established in each TMDL (40CFR122.44(d)(1)(vii)(B)).

27 Proposed Change

Part 6 V.3.(b)(2)

V.5.(b)(2)

V.6.(b)(2)

V.7.(b)(2)

V.8.(b)(2)

V.9.(b)(2)

V.10.(b)(2)

V.11.(b)(2)

Stated: further enforcement

Correction: ~~further~~ enforcement

28 Proposed Change

Stated: For public projects including those under a Capital Improvement Project Plan that disturb less than one acre of soil the Permittees shall require the development and implementation of a Storm Water Pollution Control Plan. The SWPCP shall include BMPs as identified in Tables 5, 9 and 10.

Correction: For public projects including those under a Capital Improvement Project Plan that disturb less than one acre of soil the Permittees shall require the development and implementation of a Storm Water Pollution Control Plan. The SWPCP shall include BMPs as identified in Tables ~~5~~6, 9 and 10.

29 Proposed Change

Attachment F, Monitoring Program, Core Monitoring, A. Mass Emissions, 3., 5., & 7., Pg. 2

Stated: 3. The Principal Permittee shall monitor each mass emission station each year as follows:
(a) The first storm event of the wet season that produces a 20% or greater increase in base stream flow,...

Stated: 5. Samplers shall be set to monitor storms that produce a 20% or greater increase in base stream flow.

Stated: 7. Samples shall be collected from the discharge resulting from a storm event that is 0.25 inches or greater, samples may be analyzed if a predicted storm event produces between 0.15 and 0.24 inches of rain.

Correction: *There is a conflict with sampling 20% or greater increase in base stream flow; and also sampling discharge resulting from a storm event that is 0.25 inches or greater, samples may be analyzed if a predicted storm event produces between 0.15 and 0.24 inches of rain. It is recommended that either the sampling option stated in #3 or #7 be required.

30 Proposed Change

Attachment F, Monitoring Program, Core Monitoring, A. Mass Emissions, 10., Pg. 2

Stated: Grab samples shall be taken only for pathogen indicators, hardness (as mg/L CaCO₃) and pH, temperature, and DO.

Correction: Grab samples shall be taken only for pathogen indicators, hardness (as mg/L CaCO₃), ~~and~~ pH, temperature, and DO.

31 Proposed Change

Attachment F, Monitoring Program, Core Monitoring, B. Major Outfalls, 1(d)., Pg. 4

Stated: In the first year after permit adoption, 4 major outfall stations shall be monitored. Thereafter, all major outfall stations listed in Attachment H...

Correction: In the first year after permit adoption, 4 major outfall stations shall be monitored. Thereafter, all major outfall stations listed in Attachment ~~H~~...

32 Proposed Change

Attachment F, Monitoring Program, Core Monitoring, B. Major Outfalls, 7., Pg. 5

Stated: In Major outfall samples taken within a subwatershed shall be analyzed for the biological and chemical parameters listed in the preceding subpart B.6, and for all of the constituents in Attachment "C" (Municipal Action Levels), Tables 1 & 2, as listed below:

- (a) pH
- (b) TSS
- (c) COD
- (d) Kjeldahl Nitrogen (TKN)
- (e) Nitrate & Nitrite- Total
- (f) P- Total
- (g) Cd- Total
- (h) Cr- Total
- (i) Cu- Total
- (j) Pb- Total
- (k) Ni- Total
- (l) Zn- Total
- (m) Hg- Total

Correction: In Major outfall samples taken within a subwatershed shall be analyzed for the biological and chemical parameters listed in the preceding subpart B.6, and for all of the constituents in Attachment "C" (Municipal Action Levels), Tables ~~1~~ & ~~2~~, as listed below:

~~(a) pH~~

(a) TSS

~~(c) COD~~

~~(d) Kjeldahl Nitrogen (TKN)~~

(b) Nitrate & Nitrite- Total

~~(f) P- Total~~

~~(g) Cd- Total~~

~~(h) Cr- Total~~

(c) Cu- Total

(d) Pb- Total

~~(k) Ni- Total~~

(e) Zn- Total

~~(m) Hg- Total~~

33 Proposed Change

Attachment F, Monitoring Program, Core Monitoring, D. Aquatic Toxicity Monitoring, 12., Pg. 11

Stated: Toxic samples shall be immediately subjected to Toxicity Identification Evaluation (TIE) procedures to identify the toxic chemical(s) if toxicity is determined by the standard t-test.

Correction: Toxic samples shall be immediately subjected to Toxicity Identification Evaluation (TIE) procedures to identify the toxic chemical(s) if toxicity is ~~determined~~ demonstrated by the standard t-test.

- It was recommended that the word "demonstrated" be used by USEPA.

15 Delete the word "or more of impervious surface area" from Section 5.E.II.1.(a) (2);
Delete the word "or more of impervious surface area" from Section 5.E.II.1.(a) (4);
Delete the word "or more of impervious surface area" from Section 5.E.II.1.(a) (5);
Delete the word "or more of impervious surface area" from Section 5.E.II.1.(a)(8);
Delete the word "impervious" from Section 5.E.II.1.(a) (10B);

34 Proposed Change

*Tables that are bolded and underlined are hard to read. It looks as though the title- Table 9 located on top of the table has a strikethrough.