

LATE REVISIONS
CITIES OF CITRUS HEIGHTS, ELK GROVE, FOLSOM, GALT, RANCHO CORDOVA, AND
SACRAMENTO, AND COUNTY OF SACRAMENTO
MUNICIPAL SEPARATE STORM WATER SYSTEM
SACRAMENTO COUNTY
NPDES Permit Renewal (NPDES No. CAS082597)
Regional Water Quality Control Board, Central Valley Region
Board Meeting – 17 April 2015
ITEM # 21

The following late revisions clarify comments received from the Sacramento Stormwater Quality Partnership (SSQP) and Board staff responses based on these clarifications.

1. Permittees Comment 5. Status of Pesticide Plan and Sediment Monitoring Program, Provision D.27.a.vi

Replace Board staff response as shown below.

RESPONSE: Central Valley Water Board staff concurs with the proposed modifications to Provision D.27.a.vi of the tentative Order, and has included modifications consistent with requirements contained in Provision II.E.1 of the MRP. Provision II.E.1 of the MRP states sediment monitoring is not required under this tentative Order until an evaluation of sediment toxicity results with recommendation has been completed.

Provision D.27.a.vi is modified as shown in ~~strikeout~~/underline below:

- vi. The Permittees ~~shall coordinated with~~ the Pesticide Plan component of the SQIP with pesticide monitoring data, to the extent that pesticides in sediments ~~are~~ were identified as causing or contributing to receiving water impacts. In the fourth permit term, The Permittees shall conducted sediment monitoring as part of incorporate a Sediment Monitoring program into the Pesticide Plan as part of the SQIP. The Sediment Monitoring program shall included information as specified in the Monitoring and Reporting Program of this Order of the fourth permit term. Sediment toxicity monitoring is not required under this Order.

2. Permittees Comment 7. Application of Program Effectiveness Assessment Results, Provision D.29.c

Modify Permittees comment as show in underline format below.

The Permittees request to modify language to clarify that the program effectiveness assessment results reported in their 2013 ROWD were used to propose amendments to their SQIPs and identify new BMPs, or modification of existing BMPs. The proposed modification also includes a statement that the proposed amendments to SQIPs are not incorporated into the Order since the tentative Order requires that the approved 2010 SQIPs be implemented and is not requiring new SQIPs.

3. Permittees Comment 10. Monitoring and Response Program Requirements

i. Urban Tributary Monitoring – Alternative Plan Proposal - Provision II.B.2

Replace Board staff response as shown below.

Response: Central Valley Water Board staff concurs in part. Board staff response incorporates clarifications from the Permittees. The below modifications have been made in underline format.

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Report of Water Quality Exceedance (RWQE) preparation during the a previous permit term included development of a work plan to address the cause and nature of dissolved oxygen (DO), pH, and temperature exceedances in several urban tributaries. ~~Multiple steps in the work plan have been completed. The Phase III update report (September 17, 2009) recommended additional sample collection and sensor deployment only if necessary to provide context for ongoing urban tributary sample collection. The Permittees continued to implement the work plan elements and begin Phase II upon adoption of fourth permit term. Much of the work was performed in Morrison Creek although, other creeks were identified. The work plan and any updates to the plan were included in the SQIP.~~

The Permittees may propose and implement an alternative plan for urban tributary monitoring specified under Provision II.B.2 of the MRP for approval by the Executive Officer. In addition to requirements under Provision I.A of the MRP, the alternative plan shall specify goals and objectives, and modifications to monitoring locations, sampling method and frequency, and constituents, as applicable. The proposed plan shall be compatible with SWAMP protocols and equivalent to the monitoring required by the MRP. The Permittees shall implement the alternative plan for urban tributary monitoring once approved by the Executive Officer.

4. **k. Urban Discharge Monitoring – Alternative Plan Proposal - Provision II.B.3**

Modify Permittees comment as shown below in underline/strikeout format.

Comment: The Permittees request to modify the language to clarify that require the proposal of, not implementation of, an alternative urban discharge monitoring plan. ~~The Permittees request that the alternative urban discharge monitoring plan would not be submitted with the Annual Monitoring Plan or require and approved by the Executive Officer approval.~~

5. **I. Urban Discharge Monitoring – Minor Edit - Provision II.B.3**

Replace Board staff response as shown below.

Response: Central Valley Water Board staff does not concur with the proposed modification. “Local Water Quality Monitoring” is a new term that is introduced as part of the regional monitoring program language in the tentative Order. Local water quality monitoring is both receiving water and urban discharge monitoring. For clarification, Provision II.B.3 has been modified as shown in underline format below:

3. Urban Discharge Monitoring

“...In coordination with local Receiving Water Monitoring, in two of every three years, samples shall be collected during threes storm events and one dry season monitoring event...”

6. **m. Water Column and Sediment Toxicity Evaluations - Provisions II.D and II.E.1**

Replace Permittees comment as shown below.

Comment 1: Permittees request the below modifications to Provision II.D.

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Further water column toxicity monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer ~~complete~~.

Replace Board staff response as shown below.

Response 1: Central Valley Water Board staff concurs in part. The Permittees have completed the water column toxicity monitoring required under the previous Order. Therefore, no additional water column toxicity monitoring is required under the proposed permit. Provision II.D has been modified as shown below in underline strikeout format.

Further water column toxicity monitoring activities will not be required under this Order ~~until the evaluation with recommendations is complete~~.

Comment 2: Permittees request the below modifications to Provision II.E.1.

Sediment toxicity resulting from pyrethroid pesticides was ~~recently~~ identified in ~~a study performed through~~ multiple Statewide Ambient Monitoring Programs (SWAMP) and other monitoring in the Sacramento area (Roseville, CA) and statewide urban tributaries....

Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer ~~complete~~.

Any sampling of sediment performed by the Permittees shall be consistent with SWAMP Quality Assurance Management Plan (QAMP) protocols.

Response 2: Central Valley Water Board staff concurs and Provision II.E.1 has been modified.

7. o. **Bioassessment Monitoring - Provision II.F**

Replace Board staff response as shown below.

Response: Board staff concurs in part. Request for Executive Officer approval is duplicative of Provision I of the tentative Order, which requires approval of the Regional Water Board or Executive Officer for any modifications of the MRP. Provision II.F has been modified as shown below in strikeout format.

Further bioassessment monitoring activities will not be required under this Order. ~~until the evaluation with recommendations is complete, and the monitoring effort is adapted in consultation with SWAMP's bioassessment workgroup. If applicable, an updated bioassessment monitoring plan shall be included in the SQIP.~~

8. q. **Sampling Summary, Table A - Provision II**

Replace Permittee comment as shown below.

Comment: The Permittees request that the Table A "Constituent List" and "Frequency" columns be revised for consistency with the Monitoring and Reporting requirements in II.B, II.C, II.D, II.E, and II.F and to add the below language as shown in underline format below.

Further water column toxicity monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer.

Replace Board staff response as shown below.

Response: Board staff concurs.

The below language was modified in Table A as shown in strikeout/underline as shown below:

II.H. Sampling Summary

...
Table A (Constituents List column)

- First Row (II.B.1): ~~No pyrethroids in water column, pending evaluation.~~
- Second Row (II.B.2): ~~No pyrethroids in water column, pending evaluation.~~
- Third Row (II.C): ~~No pyrethroids in water column, pending evaluation.~~
- Fourth Row (II.D): ~~2 Wet, 1 Dry per year~~
Monitoring shall be conducted in two out of five years.
Further water column toxicity monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer.
- Fifth Row (II.E): ~~1 Wet, 2 Dry per year~~
~~Wet event to be performed directly following a wet weather urban tributary event, and no later than April~~
Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order.

The following additional footnote was also inserted to apply to the entire Table A:
The Executive Officer may allow modifications or replacement of these activities through participation in a regional monitoring program or other alternative monitoring program proposed by the Permittees as described in the relevant MRP section.

9. **s. List of Constituents and Associated Minimum Levels for the Storm Water and Urban Discharge Monitoring Program, Table B**

Replace Board staff response as shown below.

Response: Central Valley Water Board staff concurs. The requested language has been removed from Table B.

Permittees Comment 11. Revisions to Fact Sheet

10. c. **Hydromodification Plan and Status of the Sacramento Program - Section V.H**

Replace the Permittees comment as shown below.

Comment: The Permittees request to modify the language to reflect that the Hydromodification Modification Plan has been submitted and also to remove additional language that was erroneously place in the section.

Replace Board staff response as shown below.

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Response: Central Valley Water Board staff concurs. The below modifications have been made as shown in underline/strikeout format below.

To address low impact development (LID) and hydromodification, this Permit requires the Permittees revise their Development Standards and associated technical guidance (a.k.a. Stormwater Quality Design Manual) and, upon approval by the Regional Board, implement ~~submit~~ a Hydromodification Management Plan (HMP).

~~Status of the Sacramento Program~~

~~Since the initiation of the program in 1990, the Permittees have completed the following work:~~

~~Established the legal authority to prohibit non-stormwater discharges and enforce those prohibitions through the adoption of local land grading and erosion control and stormwater ordinances~~

~~Established and continued implementation of inspections, reporting procedures and enforcement to achieve compliance on construction sites.~~

~~Conducted employee training with regard to review, inspection and enforcement~~

~~Provided outreach and guidance to the development community through workshops and brochures on local and State requirements~~

~~Established and maintained tracking databases and maps to assist with investigations and identification of problem areas~~

11. d. Receiving Water Monitoring, Section VI. B

Replace Board staff response as shown below.

Response: Central Valley Water Board staff concurs in part. Monitoring for pyrethins pesticides are not currently required. The below modifications have been made as shown in strikeout format.

A. Receiving Water Monitoring

...The American and Sacramento Rivers have two monitoring stations each.

These stations are located downstream of major urban discharges on the American River and on the Sacramento River there is an upstream station and a downstream station in an effort to monitor worst-case water quality conditions for compliance with receiving water limits. Receiving water monitoring for rivers and urban tributaries is required to analyze for constituents listed in Table B, except for ~~pyrethroids/pyrethrins~~ pesticides in water...

12. e. Receiving Water Monitoring, Exceedance Study - Section VI.B

Replace Board staff response as shown below.

Response: Central Valley Water Board staff concurs in part with the proposed modifications. The request to add Executive Officer approval is duplicative of Provision I of the tentative Order, which requires approval of the Regional Water Board or Executive Officer for any modifications of the MRP.

Section VI.B of the tentative Order is modified, in part, to: 1) update the status to the data and study evaluation; 2) limit the further investigation of exceedances of dissolved oxygen, pH, and

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temperature; and 3) include an update to a citation as shown in strikeout/underline format below:

A. **Receiving Water Monitoring**

...

Report of Water Quality Exceedance (RWQE) preparation during the third permit term included development of a work plan to address the cause and nature of dissolved oxygen (DO), pH, and temperature exceedances in several urban tributaries. ~~Multiple steps in the work plan have been completed in multiple steps.~~^{34 35 36 37} The Permittees recommended that further investigation is only needed to provide context for future grab samples. ~~were required to continue to implement the work plan elements and begin Phase II under the fourth permit term.~~ Further implementation of the work plan to address the cause and nature of dissolved oxygen, pH, and temperature exceedances in several urban tributaries will not be required under this Order ~~until the evaluation with recommendations is complete.~~

...

Footnote 37: The final report was submitted as part of the 1 October 2009 Annual Report, Laurenson, Walker, Chetal, Annual Report, Phase III Investigation Results – Morrison Creek pH, Dissolved Oxygen, and Temperature. Memorandum to Delia McGrath, City of Sacramento and Ken Ballard, Sacramento County, 17 September 2009.

13. f. **Method Detection Monitoring, Diazinon and Chlorpyrifos and Sediment Monitoring – Section VI.G**

Replace Board staff response as shown below.

Response: Central Valley Water Board staff concurs in part. The Permittees completed the sediment monitoring required by the previous permit. Therefore, no additional sediment monitoring is required in the proposed permit. The below modifications have been made as shown in underline format.

The phase-out of the sale of diazinon and chlorpyrifos for most residential and commercial uses resulted in an increase in the use of pyrethroid pesticide use in urban and residential areas. Monitoring of sediment quality and urban runoff/discharges was performed during the third Permit to characterize sediment/water quality conditions, determine the significance of the increase in urban pyrethroid usage, and assess management practice effectiveness. Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order.

The following late revisions summarize the proposed revisions to the Sacramento Area Municipal Separate Storm Sewer System NPDES permit.

1. Waste Discharge Requirements – Updating Storm Water Management Plan during Limited Term Permit. Finding 64.

Clarify that the Storm Water Management Plan (SWMP), also referred to as the *Storm Water Quality Implementation Plan* or (SQIP) has already been developed, and may be revised, during the limited term permit as shown in underline/strikeout format below:

64. The overall goals of the Permittees' SQIP ~~is are to:~~ ~~a) reduce the degradation of waters of the State and Waters of the United States (U.S.) by urban runoff and protect their beneficial uses;~~ ~~and b) develop and~~ The Permittees revise, as necessary, and implement an effective SQIP that is well understood and broadly supported by regional stakeholders.

...

2. Storm Water Quality Improvement Plan – Implementation of Annual Work Plans. Provision D.2

Clarify that the schedules in the Annual Work Plans will be implemented during the limited term permit as shown underlined below:

2. The Permittees must continue implementing the SQIP approved by the Regional Water Board on 29 January 2010, and SQIP modifications contained in the 2010, 2011, 2012, 2013, and 2014 Annual Reports and Annual Work Plans. The SQIPs and Annual Work Plans include an implementation schedule containing identifiable milestones, performance standards, and a compliance monitoring and reporting program...

3. Program Elements – Municipal Program, Provision D.10.a.ix

Clarify that a response plan has already been completed to address emergency fire fighting flows as shown in strikeout below:

- ix. Permittees having a fire protection agency within their jurisdictional control shall ~~develop and implement a response plan to minimize the impact of fire fighting flows to the environment...~~

4. Water Quality Based Programs –Status of Pesticide Plan and Sediment Monitoring Program, Provision D.27.a.vi

Modify the language to reflect the current implementation status of the Pesticide Plan requirements as shown in underline/strikeout below:

- vi. The Permittees ~~shall~~ coordinated with the Pesticide Plan component of the SQIP with pesticide monitoring data, to the extent that pesticides in sediments ~~are~~ were identified as causing or contributing to receiving water impacts. In the fourth permit term, ~~the~~ Permittees ~~shall~~ conducted sediment monitoring as part of ~~incorporate a Sediment Monitoring program into the Pesticide Plan as part of the SQIP.~~ The Sediment Monitoring program shall included information as specified in the Monitoring and Reporting Program of this Order ~~of the fourth permit term.~~ Sediment toxicity monitoring is not required under this

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Order.

5. Program Effectiveness Assessment – Tracking Progress of SQIP Implementation. Provision D.29.b

Clarify that the long-term progress of each SQIP had been tracked and reported with the 2013 Report of Waste Discharge (ROWD) as shown in underline/strikeout below:

- b. The Permittees ~~shall tracked~~ the long-term progress of their SQIPs towards achieving improvements in receiving water quality and submitted this information as part of the March 15, 2013 ROWD/LTEA.

6. Program Effectiveness Assessment – Application of Program Effectiveness Assessment Results. Provision D.29.c and d

Clarify that the program effectiveness assessment results reported in their 2013 ROWD were used to amend each SQIP, identify new best management practices (BMPs), or modify existing BMPs as shown in underline/strikeout below:

- c. The Permittees ~~shall used~~ the information gained from the program effectiveness assessment to improve their SQIPs and identify new BMPs, or modification of existing BMPs. This information ~~shall be~~ was reported as part of the March 15, 2013 ROWD/LTEA, within the Annual Reports consistent with this Order. Due to the limited term of this Order, the proposed amendments to the SQIPs provided in the 2013 ROWD are not incorporated into this Order.
- d. The Permittees shall continue to use the information gained from the program effectiveness assessment and reported in the Annual Report to demonstrate compliance with their respective approved SQIPs and this Order.

7. Additional Requirements – Revisions to Monitoring and Reporting Program. Provision D.30

Modify Monitoring and Reporting Program revisions may be approved by the Board or Executive Officer is shown underlined below:

30. Monitoring and Reporting Program: The Permittees shall comply with the Monitoring and Reporting Program which is part of this Order, and any revisions thereto approved by the Board or Executive Officer. Because the Permittees operate facilities which discharge waste subject to this Order, the Monitoring and Reporting Program is necessary to ensure compliance with these waste discharge requirements.

8. Attachment A – Permit Area Map

Replace Attachment A (Permit Boundary Map) in Tentative Order with updated map.

9. Monitoring and Reporting Program – Program Effectiveness Level Reported in Annual Reports. Provision I.B

Add text to clarify the level of program effectiveness required in Annual Reports as shown underlined below:

“...It shall include a compilation of deliverables and milestones completed during the previous fiscal year, and a discussion of Outcome Level 1 program effectiveness relative to performance standards defined In the SQIPs...”

**10. Monitoring and Reporting Program – Level of Effectiveness Conducted Annually.
Provision I.B.5**

Add text to clarify the level of effectiveness assessment required to be conducted will eventually be inclusive of all program management questions as shown underlined below:

“...The primary questions that must be ultimately be assessed for each program element include the following:...”

11. Monitoring and Reporting Program – Status of Long Term Trend Evaluation of MS4 Discharges and Receiving Water Quality, Provision I.B.10

Add text to clarify specific factors were considered in developing the trend evaluation submitted with the 2013 ROWD as shown in underline/strikeout below:

10. The ROWD at the end of the fourth permit term included:

An estimate of total pollutant loads attributable to urban runoff for target pollutants at each discharge monitoring station;

An evaluation of the long-term trends in MS4 discharges and receiving water quality. Several factors ~~need to be~~ were considered when evaluating trends, such as changes in sample collection methods, data quality differences, and changes in analytical methods.

An evaluation of significant correlations of target pollutants with other constituents, such as total suspended solids (TSS).

**12. Monitoring and Reporting Program – Regional Monitoring Program Language,
Provision II**

Delete extraneous word in regional monitoring program language as shown in strikeout below:

...
During the period of participation in the RMP, the Permittees shall continue to report any individually ~~local~~-conducted local water quality monitoring data in the Annual Report consistent with Provision I.B.4, Monitoring and Reporting Program. In addition, with each submitted Annual Report, the Permittees' shall include 1) a statement that the Permittees are participating in the RMP in lieu of conducting the local monitoring program required by the permit, and 2) the Permittees shall continue to attach a copy of the letter originally submitted to the Regional Water Board describing the monitoring location(s) and constituents that will no longer be conducted individually.

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13. Monitoring and Reporting Program – Status of Work Plans to Address Cause/Nature of Exceedances, Provision II.B.2.b

Clarify the status of urban tributary sample collection completed, or in progress, and implementation of the exceedance work plan:

b. Report of Water Quality Exceedance (RWQE) preparation during the a previous permit term included development of a work plan to address the cause and nature of dissolved oxygen (DO), pH, and temperature exceedances in several urban tributaries. ~~Multiple steps in the work plan have been completed. The Phase III update report (September 17, 2009) recommended additional sample collection and sensor deployment only if necessary to provide context for ongoing urban tributary sample collection. The Permittees continued to implement the work plan elements and begin Phase II upon adoption of fourth permit term. Much of the work was performed in Morrison Creek although, other creeks were identified. The work plan and any updates to the plan were included in the SQIP.~~

The Permittees may propose and implement an alternative plan for urban tributary monitoring specified under Provision II.B.2 of the MRP for approval by the Executive Officer. In addition to requirements under Provision I.A of the MRP, the alternative plan shall specify goals and objectives, and modifications to monitoring locations, sampling method and frequency, and constituents, as applicable. The proposed plan shall be compatible with SWAMP protocols and equivalent to the monitoring required by the MRP. The Permittees shall implement the alternative plan for urban tributary monitoring once approved by the Executive Officer.

14. Monitoring and Reporting Program – Urban Discharge Monitoring, Provision II.B.3

Clarify section heading as shown in underline/strikeout below:

3. Urban Discharge Monitoring

“...In coordination with local Receiving Water Monitoring, in two of every three years, samples shall be collected during threes storm events and one dry season monitoring event...”

15. Water Column and Sediment Toxicity Evaluations - Provision II.D

Replace text to clarify the Water Column Toxicity Monitoring activities.

Further water column toxicity monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer ~~complete~~.

16. Water Column and Sediment Toxicity Evaluations - Provision II.E.1

Sediment toxicity resulting from pyrethroid pesticides was ~~recently~~ identified in a study performed ~~through~~ multiple Statewide Ambient Monitoring Programs (SWAMP) and other monitoring in the Sacramento area (Roseville, CA) and statewide urban tributaries....

Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer ~~complete~~.

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Any sampling of sediment performed by the Permittees shall be consistent with SWAMP Quality Assurance Management Plan (QAMP) protocols.

17. Monitoring and Reporting Program – Pesticide Plan, Provision II.E.2

Replace text to clarify the Pesticide Plan implementation requirements as shown in underline/strikeout below:

2. The Permittees shall ~~review and amend~~ continue to implement the Pesticide Plan component of the SQIP, if pesticides in sediments are identified as causing or contributing to receiving water impacts.

~~The Pesticide Plan shall address the following elements:~~

- a. ~~Identification, development, implementation and assessment of BMPs to address controllable discharges of sediment bound contaminants that may be linked to sediment toxicity to the MEP;~~
- b. ~~Development and adoption of policies, procedures, and/or ordinances to implement BMPs;~~
- c. ~~A time schedule for implementation and assessment.~~

18. Bioassessment Monitoring - Provision II.F

Replace text to clarify the Bioassessment monitoring requirements as shown in underline/strikeout below:

~~Further bioassessment monitoring activities will not be required under this Order. until the evaluation with recommendations is complete, and the monitoring effort is adapted in consultation with SWAMP's bioassessment workgroup. If applicable, an updated bioassessment monitoring plan shall be included in the SQIP.~~

19. Monitoring and Reporting Program – Water Quality Based Programs, Total Mercury and Methylmercury Analyses, Provision II.G.2.j

Replace text to clarify the current status of the Total Mercury and Methylmercury analyses and allow progress reports to be submitted after October 2015 with Executive Officer approval to coordinate grant reporting requirements as shown in underline/strikeout below:

- j. Recommendations for including total mercury and methylmercury monitoring in the design of future BMP studies to estimate the extent to which existing and new BMPs reduce total mercury and reduce and/or increase methylmercury discharges.

...The Work Plan was approved by the Executive Officer on 7 November 2013. The approved Work Plan evaluates the performance of a Proposition 84 Grant funded green parking lot project. and †The Permittees are required to provide a progress report on the study by October 2015 or at a later date as approved by the Executive Officer to better coordinate with the grant reporting requirements.

...

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20. Sampling Summary - Table A, Provision II

Modify text to clarify monitoring requirements described elsewhere in permit as shown in underline/strikeout below:

II.H. Sampling Summary

...
Table A (Constituents List column)

First Row (II.B.1):	No pyrethroids in water column, pending evaluation.
Second Row (II.B.2):	No pyrethroids in water column, pending evaluation.
Third Row (II.C):	No pyrethroids in water column, pending evaluation.
Fourth Row (II.D):	2 Wet, 1 Dry per year <u>Monitoring shall be conducted in two out of five years.</u> <u>Further water column toxicity monitoring activities will not be required under this Order until the evaluation with recommendations is approved by the Executive Officer.</u>
Fifth Row (II.E):	1 Wet, 2 Dry per year Wet event to be performed directly following a wet weather urban tributary event, and no later than April <u>Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order.</u>

The following additional footnote was also inserted to apply to the entire Table A:
The Executive Officer may allow modifications or replacement of these activities through participation in a regional monitoring program or other alternative monitoring program proposed by the Permittees as described in the relevant MRP section.

21. List of Constituents and Associated Minimum Levels for the Storm Water and Urban Discharge Monitoring Program, Table B

Delete the following text as shown in strikeout format below:

~~The following analysis would only be required if monitoring results from the studies investigating the Pelagic Organism Decline in the Delta indicate these concentrations are present and of concern in Sacramento Permittee discharges.~~

22. Fact Sheet – Permitting History, Section IV.A

Move sentence describing Permittees' permitting history within section as shown in underline/strikeout below:

B. Sacramento Areawide NPDES MS4 Permit History

...The Permittees' SQIPs^{14,15} submitted with the Report of Waste Discharge in June 2007 describe the 18-year history and evolution of the Sacramento program, including a summary of accomplishments and findings. ~~The SQIPs were adopted by the Regional Water Board 29 January 2010 (Resolution No. R5-2010-0017).~~

In September 2008, the Regional Water Board adopted the fourth Sacramento area-wide MS4 permit (Order No. R5-2008-0142). Permittees included the County of Sacramento and Cities of Citrus Heights, Elk Grove, Galt, Folsom, Rancho Cordova, and Sacramento. The SQIPs were adopted by the Regional Water Board 29 January 2010 (Resolution No. R5-2010-0017). On 15 March 2013, the Permittees submitted a ROWD to the Central Valley Water Board requesting permit re-issuance. The ROWD included proposed amendments to the SQIP based on a completed Long Term Effectiveness Assessment.

23. Fact Sheet – Storm Water Management Element, Section V

Add comma and text for consistency with other parts of the tentative Order as shown underlined below:

V. STORM WATER MANAGEMENT PROGRAM ELEMENTS

...The Permittees must continue implementing the SQIP approved by the Regional Water Board on 29 January 2010 (Resolution No. R5-2010-0017), and as modified in the 2010, 2011, 2012, 2013, and 2014 Annual Reports and Annual Work Plans.

24. Fact Sheet – Hydromodification Plan and Status of the Sacramento Program, Section V.H

Remove a list of program accomplishments that were inserted under the incorrect program element as shown in strikethrough format below:

H. Planning and New Development Program

Discussion of Requirements in This Permit

...

To address low impact development (LID) and hydromodification, this Permit requires the Permittees revise their Development Standards and associated technical guidance (a.k.a. Stormwater Quality Design Manual) and, upon approval by the Regional Board, implement ~~submit~~ a Hydromodification Management Plan (HMP).

~~Status of the Sacramento Program~~

~~Since the initiation of the program in 1990, the Permittees have completed the following work:~~

- ~~Established the legal authority to prohibit non-stormwater discharges and enforce those prohibitions through the adoption of local land grading and erosion control and stormwater ordinances~~
- ~~Established and continued implementation of inspections, reporting procedures and enforcement to achieve compliance on construction sites.~~
- ~~Conducted employee training with regard to review, inspection and enforcement~~
- ~~Provided outreach and guidance to the development community through workshops and brochures on local and State requirements~~
- ~~Established and maintained tracking databases and maps to assist with investigations and identification of problem areas~~

...

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25. Fact Sheet – Receiving Water Monitoring, Section VI.B

Clarify that receiving water monitoring in rivers and urban tributaries does not include sampling for pyrethrins pesticides in water as shown in strikeout format below:

C. Receiving Water Monitoring

...

The American and Sacramento Rivers have two monitoring stations each. These stations are located downstream of major urban discharges on the American River and on the Sacramento River there is an upstream station and a downstream station in an effort to monitor worst-case water quality conditions for compliance with receiving water limits. Receiving water monitoring for rivers and urban tributaries is required to analyze for constituents listed in Table B, except for ~~pyrethroids/pyrethrins~~ pyrethrins pesticides in water.

...

26. Fact Sheet – Receiving Water Monitoring, Exceedance Study, Section VI.B

Clarify the status update to exceedance data and study evaluation; limit investigation of exceedances for dissolved oxygen, pH, and temperature; and update the referenced citation as shown in underline/strikeout format below:

B. Receiving Water Monitoring

...

Report of Water Quality Exceedance (RWQE) preparation during the third permit term included development of a work plan to address the cause and nature of dissolved oxygen (DO), pH, and temperature exceedances in several urban tributaries. ~~Multiple steps in the work plan have been completed in multiple steps.~~^{34 35 36 37} The Permittees recommended that further investigation is only needed to provide context for future grab samples. ~~were required to continue to implement the work plan elements and begin Phase II under the fourth permit term.~~ Further implementation of the work plan to address the cause and nature of dissolved oxygen, pH, and temperature exceedances in several urban tributaries will not be required under this Order ~~until the evaluation with recommendations is complete.~~

...

Footnote 37: The final report was submitted as part of the 1 October 2009 Annual Report, Laurenson, Walker, Chetal, Annual Report, Phase III Investigation Results – Morrison Creek pH, Dissolved Oxygen, and Temperature. Memorandum to Delia McGrath, City of Sacramento and Ken Ballard, Sacramento County, 17 September 2009.

27. Method Detection Monitoring, Diazinon and Chlorpyrifos and Sediment Monitoring - Section VI.G

Replace text to clarify the sediment monitoring requirements as shown in underline/strikeout below:

The phase-out of the sale of diazinon and chlorpyrifos for most residential and commercial uses resulted in an increase in the use of pyrethroid pesticide use in urban and residential areas. Monitoring of sediment quality and urban runoff/discharges was performed during the third

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Permit to characterize sediment/water quality conditions, determine the significance of the increase in urban pyrethroid usage, and assess management practice effectiveness. Monitoring was completed during the fourth permit term, so further sediment monitoring activities will not be required under this Order.