
Key Issues & Potential Modifications: Se TMDLs for the Newport Bay Watershed

Workshop #1: TMDL and Allocations

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Purpose

- Focus on APPROACH
 - Values for allocations discussed during Workshop #2

**Wasteload
Allocations**

**Load
Allocations**

**Margin of
Safety**

Key Points of Consensus

- Rising Groundwater is a nonpoint source
- Implicit margin of safety
- Attainment of tissue-based numeric targets deemed equivalent to attaining WLA

Key Issues Overview

- Concentration and/or Load Based Allocations
- Tiered Concentration Allocations

Key Issue: Allocation Approach

- Currently established as concentration-based, but strong desire for mass-based option
 - Allow for offsets (provide a mechanism to account for removal of the discharge, e.g., the diversion BMPs)

Potential Modification: Allocations Approach

- Assign mass-based conditional WLAs specific to certain discharges, like the dewatering operations (e.g., the controllable point sources)

Concentration-Based Allocations

OR

Conditional Mass-Based
Allocations



Apply when certain conditions are met:

1. Participate in an approved Offset Program
2. Offset the entire discharge (discharge concentration x flow)

Key Issue:

Tiered Concentration Allocations

- Desire to use the back-calculated concentration range to determine final WLA
- Significant comments from EPA on this issue



Potential Modifications: Tiered Allocation

- OPTION 1: No Change
- OPTION 2: Use equation for concentration
- OPTION 3: Modify, but keep intent
 - Clarify attainment of tissue targets as being deemed equivalent to attaining the WLA
 - Consider tiered approach as part of the implementation schedule

