

Chollas Creek Diazinon Total Maximum Daily Load (TMDL)

Resolution:	R9-2002-0123
Effective Date:	September 11, 2003
Impaired Water Body:	Chollas Creek
Pollutant:	Diazinon
Responsible Dischargers:	Dischargers within the Chollas Creek watershed. The Chollas Creek Diazinon TMDL watershed boundaries are defined by those lands in the Chollas HSA (908.22) that drain to the Chollas Creek. Those lands draining to Switzer Creek are excluded from this TMDL. ¹
Required Actions:	Dischargers in compliance with the Industrial General Permit 2014-0057-DWQ (General Permit) meet the requirements of the Chollas Creek Diazinon TMDL. The Regional Water Board may require Dischargers to implement additional actions to reduce Diazinon discharges based on a site-specific analysis.
TMDL documents are available at: http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/chollascreekdiazinon.shtml	

Fact Sheet for Chollas Creek Diazinon TMDL

Background

The Chollas Creek Diazinon TMDL addresses the Clean Water Act section 303(d) impairment for acute and chronic toxicity impacts related to Diazinon² in Chollas Creek. The presence of Diazinon causes toxicity to aquatic life. The 2005 USEPA phase out of Diazinon will reduce discharges of Diazinon products to the Chollas Creek watershed from Discharger’s facilities to negligible amounts over time.^{3 4} However, products containing Diazinon are still available for use as pest control and sources of loading by Dischargers in the Chollas Creek watershed if purchased and stockpiled prior to 2005. A source analysis for Diazinon indicates that urban runoff from industrial and commercial land uses is a primary source of Diazinon in the Chollas Creek watershed area.⁵ Common sources of Diazinon loading in urban runoff include products containing

¹ Resolution No. R9-2002-0123, Technical Report, p. 11.

² Resolution No. R9-2002-0123, Technical Report, p. 21.

³ Retail Sales for indoor use ended December 2002; Diazinon manufacturing stopped and retail sales for lawn/garden care ended August 2003; Diazinon was no longer available for purchase January 2005
http://www.waterboards.ca.gov/sandiego/water_issues/programs/tmdls/docs/tmdlproject/chollas_creek_diazinon.pdf

⁴ Resolution No. R9-2007-0123, Technical Report, pp. 24-25.

⁵ Resolution No. R9-2002-0123, Technical Report, p. 11.

Diazinon used for landscape maintenance and structural pest control.⁶ Background sources and nonpoint sources of Diazinon are insignificant.⁷

The Chollas Creek Diazinon TMDL identifies the following dischargers responsible for point source discharges of Diazinon to Chollas Creek: Municipal Separate Storm Sewer System (MS4s), Caltrans, general construction permittees, and utility companies.⁸

TMDL Waste Load Allocation

Dischargers in commercial and industrial land use categories are included in the municipal MS4s waste load allocation (WLA). Because the San Diego Water Board determined point source discharges of Diazinon were primarily discharged from MS4s (municipal and Caltrans), the primary mechanism for meeting this TMDL is through the municipal MS4 and Caltrans NDPEs permits and municipal land use ordinances. Separate WLAs have not been assigned to Dischargers.

TMDL Requirements

Although Dischargers have not been assigned a separate WLA, Dischargers remain responsible for demonstrating that their discharges do not cause or contribute to exceedances of Diazinon in the Diazinon TMDL watershed. Enrollment in this General Permit satisfies this requirement because Dischargers enrolled in the General Permit are not expected to cause or contribute to an exceedance of Diazinon in Diazinon impaired waters.

This General Permit requires Dischargers to take actions to control their risk of Diazinon discharges. Dischargers shall identify all potential Diazinon contributions from their site (section X.G), implement BMPs to reduce Diazinon discharges (section X.H), sample discharges for Diazinon (section XI.B.6), and conduct visual observations (section XI.A) as described in this General Permit. For Dischargers with coverage under the prior General Permit, the current General Permit requires that Dischargers implement an updated SWPPP in accordance with section X, by July 1, 2015. For Dischargers filing after July 1, 2015, the General Permit requires development of a SWPPP in accordance with section X. The update or development of a SWPPP for this General Permit satisfies this TMDL requirements because the General Permit requires enrolled Dischargers to take actions to control their discharges of Diazinon, monitor the effects of efforts to control pollutants, and report the outcomes. Additionally, non-storm water discharges are not authorized unless they meet the requirements as set forth in section IV.B of the General Permit.

⁶ Structural pest control is the control of household pests (including but not limited to rodents, vermin and insects) and wood-destroying pests and organisms or such other pests which may invade households or structures, including railroad cars, ships, docks, trucks, airplanes, or the contents thereof. <http://www.pestboard.ca.gov/about/whatis.shtml>

⁷ Resolution No. R9-2007-0123, Attachment A, p. 4; Technical Report p. 17

⁸ Resolution No. R9-2007-0123, Attachment A, p. 6

Monitoring and Reporting

The TMDL states that municipal MS4s have the primary monitoring responsibility under the TMDL. To the extent Dischargers may be contributing Diazinon loads into Diazinon impaired waters, the General Permit's existing monitoring requirements are sufficient to identify significant sources. Dischargers that monitor the point(s) of discharge from their facility in accordance with this General Permit are in compliance with the necessary TMDL monitoring.

Visual observation monitoring conducted in compliance with section XI of this General Permit satisfies the monitoring requirements of the TMDL. During dry weather days, monthly visual observations shall be conducted in accordance with section XI.A of the General Permit. Monthly visual observations by Dischargers would identify unauthorized non-storm water discharges (NSWDS), potential sources of industrial pollutants, BMPs maintenance conditions, and authorized NSWDS. During wet weather sampling events, visual observations conducted in compliance with section XI.A must include identifying the presence of activities or materials that can contribute to Diazinon concentrations at all discharge points from the Discharger's site. This may include BMPs such as elimination of products containing Diazinon from the Discharger's site. Once identified via visual observations, it is expected that the Discharger either minimizes or eliminates the presence of activities or materials that can contribute to Diazinon concentrations in discharges from their industrial site.

Dischargers shall report the results of all required monitoring annually as part of their Annual Report. Pursuant to section XVI of this General Permit, Annual Reports are due on or before July 15.

TMDL Compliance

In light of the General Permit's existing requirements, Dischargers in the Diazinon TMDL watershed are assumed to be in compliance with this TMDL and their contribution to the total MS4 WLA if all of the following are completed:

1. Enrollment in this General Permit; and
2. Inclusion of BMPs to reduce or control D in the Discharger's SWPPP; and
3. Compliance with this General Permit.

The Regional Water Boards retain the authority to require Dischargers to revise their SWPPPs, ERA Reports, or monitoring programs as well as to direct a Discharger to obtain an individual NPDES permit if additional controls on discharges of Diazinon are necessary.

Watershed Coordination

Phase I MS4s in the Chollas Creek Diazinon TMDL are implementing an adaptive management approach to improve water quality in the Pueblo San Diego, Sweetwater,

and Otay Watershed Management Areas in the San Diego Bay Water Quality Improvement Plan. Coordinated efforts by Responsible Parties will accelerate the Diazinon waste load reductions required in the Chollas Creek Diazinon TMDL and achieve the ultimate goal of improving water quality as soon as possible. Industrial dischargers are encouraged to coordinate with Phase I MS4s and other Responsible Parties to meet the Diazinon TMDL WLA requirements in the Chollas Creek Diazinon TMDL using an adaptive management approach. Dischargers located within County of San Diego, City of San Diego, City of La Mesa, and the City of Lemon Grove, and the San Diego Unified Port District are encouraged to contact that jurisdiction's Storm Water Program Manager to collaborate.