

# Industrial Environmental Association (IEA)



**REGIONAL NPDES PERMIT FOR MUNICIPAL  
SEPARATE STORM SEWER SYSTEMS (MS4s)  
DRAINING THE WATERSHEDS WITHIN THE SAN  
DIEGO REGION**

**(TENTATIVE ORDER NO. R9-2013-0001, NPDES NO.  
CAS0109266)**

# IEA Overview



- Formed in 1983
- Promote responsible, cost-effective environmental laws and regulations
- Facilitate environmental compliance among members
- Provide education for community at large

# Key Point: Monitoring Framework



- Generally support monitoring approach that is:
  - Strategic
  - Question-driven
  - Cost-effective
- Recognize more work required to ensure Permit monitoring provisions meet these needs

# Non-stormwater Discharges



- Permitted NPDES discharges now specifically excluded from being considered illicit discharge
  - IEA supports clarifying language RWQCB added:  
NPDES permitted discharges are not prohibited

# Non-stormwater Discharges



- Firefighting discharges (non-emergency) considered illicit discharges
  - Building fire-suppression maintenance can be treated with BMPs
  - Allows discharge to not be a “significant source of pollutants”
  - Recommend retaining existing authorization for maintenance discharges when Copermitttees require use of appropriate BMPs

# Development Planning



- Hydromodification requirements
  - IEA disappointed the Regional MS4 Permit modifies the recently approved HMP
  - HMP painstakingly developed at great cost to Copermitees
    - ✦ HMP not yet fully vetted and evaluated

# Development Planning



- At a minimum:
  - Return exemptions:
    - ✦ Highly urbanized watersheds
    - ✦ Discharges to concrete lined channels
    - ✦ San Diego Bay and other embayments and lagoons
  - Return baseline to “pre-project”

# Development Inspections



- Existing development inspection provision revised to remove re-inspection for change in pollutant activities
  - IEA appreciates RWQCB staff revision on this issue
- Inspection methods need careful consideration
  - “Onsite inspections by volunteer monitoring or patrol programs”
    - ✦ Likely not feasible for many private property and/or industrial/commercial inspections