



LA County MS4 Permit Reissuance Board Workshop

Non-Storm Water Discharges
April 5, 2012

LA County MS4 Permit Outline

Discharge Prohibitions

Part 1

- **Non-Storm Water Discharge Prohibition**✓

Effluent Limitations

Part 7

- TMDL Water Quality Based Effluent Limitations (see “TMDL Provisions” below)

Receiving Water Limitations

Part 2

- Applicable numeric and narrative water quality objectives/criteria for the receiving water

Special Provisions

Part 4

- Watershed Management Programs
- **Minimum Control Measures**✓
- TMDL Provisions

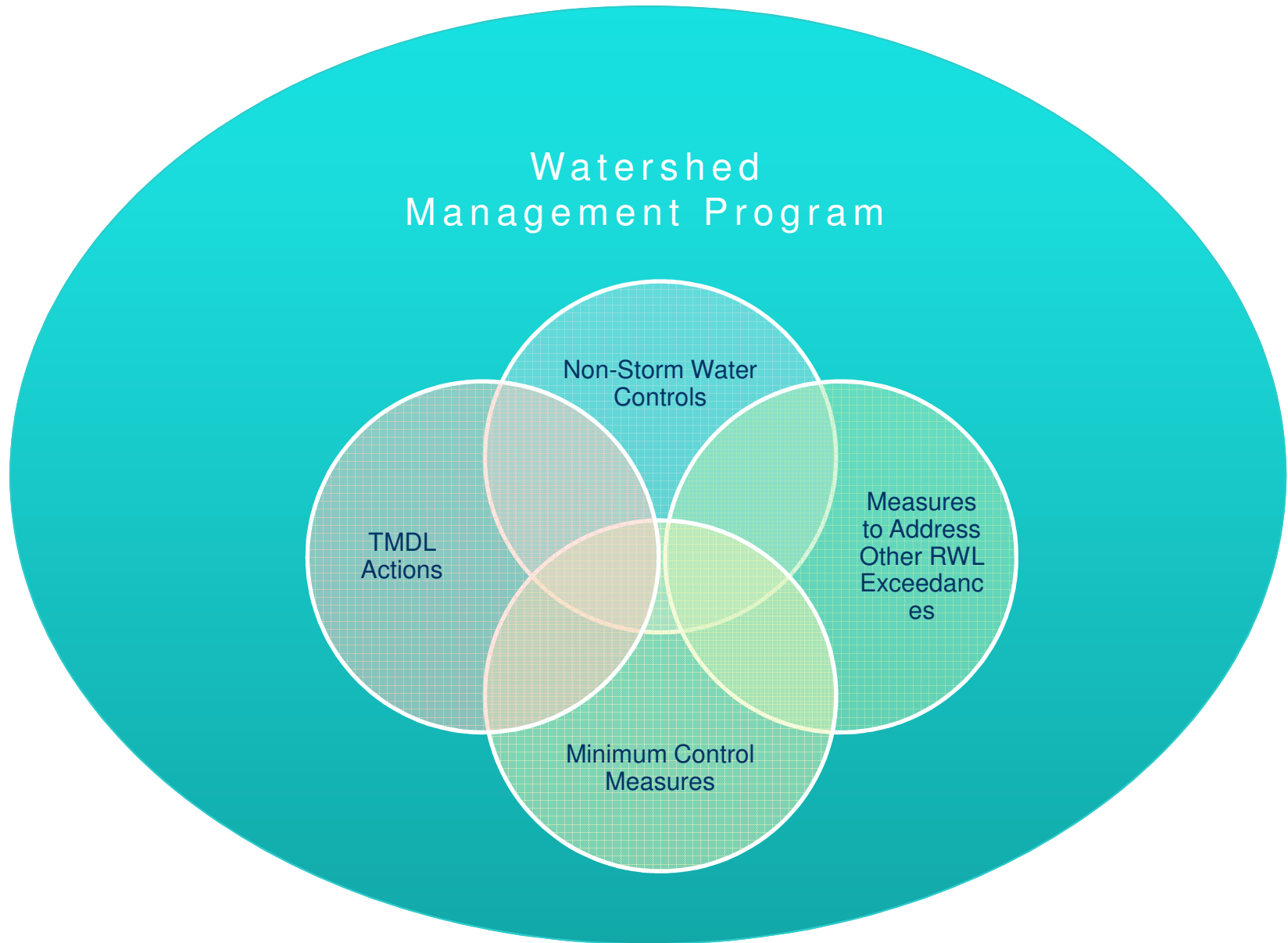
Standard Provisions

Part 6

Monitoring and Reporting Provisions

Attachment

PERMIT STRUCTURE



Background

- Non-storm water discharges = discharges not composed entirely of storm water
- MS4 permits must effectively prohibit non-storm water discharges into MS4s
- How?
 - Regulate non-storm water discharges to the MS4 under separate NPDES permit
 - Implement management program to eliminate illicit discharges into MS4

Background

- What about non-storm water discharges that commonly occur in urban environments?
- Some exemptions allowed
 - Discharges covered under an NPDES permit
 - Categorical exemptions
 - Municipalities may need to impose controls/BMPs
 - Discharge only allowed if not a source of pollutants

Background (cont.)

- Order No. 01-182
 - Non-storm water discharge prohibition
 - IDDE program requirements
 - List of exempted non-storm water discharges
 - Categorical exemptions (e.g., natural flows, emergency fire fighting , urban)
 - Discharges covered under an NPDES permit

Evaluation of Current Approaches

- IDDE program effectiveness
 - Review of annual reports
 - Inspections
- Results of dry-weather monitoring data from mass emission stations
 - Based on annual reports from 2005 to 2011
 - Provides 15 dry-weather data sets for each station

Results of IDDE Program Evaluation

- Widespread presence of persistent non-storm water discharges
 - Poor understanding of the source(s) and characteristics
 - Limited actions to address these persistent discharges
- Widespread exceedances of WQS during dry weather

Summary of Evaluation

- More detailed provisions needed to:
 - Implement effective controls on exempted categories of non-storm water discharges
 - Evaluate potential impacts from exempted categories
 - Take action if a non-storm water discharge is identified as a source of pollutants

Working Proposal - 1

- All exempted categories still included, e.g.
 - Potable water supply discharges
 - Fire fighting flows
- Table of conditions/BMPs that must be met for discharge to be allowed
- Requirements to support Permittees' authority to require discharger to provide notification, conduct monitoring, and implement BMPs

Working Proposal - 2

- Provision for Permittees to evaluate monitoring data to assess whether any exempted discharge is a source of pollutants
- Provisions requiring Permittees to take action if an exempted discharge is a source of pollutants
 - Prohibit the discharge
 - Impose additional controls
 - Require discharger to obtain coverage under a separate NPDES permit

Working Proposal – 3

Potable Water Supply Discharges

- Often required by state or federal regulations
- If a potable water supply discharge caused an exceedance of a water quality standard, the MS4 Permittee would not be found in violation of the receiving water limitation
 - Demonstration required – based on monitoring data from the discharge and other information

Working Proposal - 3 (cont.)

Potable Water Supply Discharges

- Follow-up action by MS4 Permittee
 - Evaluate potential long-term effects of continued discharges
 - Identify alternative discharge pathways in coordination with discharger
 - Impose additional controls
 - Require discharger to obtain coverage under a NPDES permit

Conclusion

- Addition of more specific conditions/BMPs for exempted non-storm water discharges similar to Ventura County MS4 Permit
- More explicit procedures for evaluating exempted discharges and taking action if they are a source of pollutants
- Provisions to address concerns regarding potable water supply discharges and fire fighting flows