

STATE OF CALIFORNIA  
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
LOS ANGELES REGION  
320 W. 4<sup>th</sup> Street, Suite 200, Los Angeles

**FACT SHEET**  
**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT**  
**FOR**  
**VENTURA PORT DISTRICT**

NPDES Permit No.: CA0057738  
Public Notice No.: 03-001

**FACILITY MAILING ADDRESS**

Ventura Port District  
1603 Anchors Way Drive  
Ventura, CA 93001

**FACILITY LOCATION**

Ventura Port District  
1603 Anchors Way Drive  
Ventura, CA 93001  
Contact: Rick Echevarria  
(805) 642-8538

**I. Public Participation**

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the above-referenced facility. As an initial step in the WDR process, the Regional Board staff has developed tentative WDRs. The Regional Board encourages public participation in the WDR adoption process.

**A. Written Comments**

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments should be submitted either in person or by mail to:

Executive Officer  
California Regional Water Quality Control Board  
Los Angeles Region  
320 West 4<sup>th</sup> Street, Suite 200  
Los Angeles, CA 90013

To be fully responded to by staff and considered by the Regional Board, written comments should be received at the Regional Board offices by 5:00 p.m. on February 15, 2003.

## **B. Public Hearing**

The Regional Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date: March 13, 2003  
Time: 9:00 a.m.  
Location: **City of Simi Valley, City Council Chambers**  
**2929 Tapo Canyon Road**  
**Simi Valley, CA**

Interested persons are invited to attend. At the public hearing, the Regional Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

## **C. Waste Discharge Requirements Appeals**

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Board's action to the following address:

State Water Resources Control Board, Office of Chief Counsel  
ATTN: Elizabeth Miller Jennings, Senior Staff Counsel  
1001 I Street, 22<sup>nd</sup> Floor  
Sacramento, CA 95814

## **D. Information and Copying**

The Report of Waste Discharge (ROWD), related documents, tentative effluent limitations and special conditions, comments received, and other information are on file and may be inspected at 320 West 4<sup>th</sup> Street, Suite 200, Los Angeles, California 90013, at any time between 8:30 a.m. and 4:45 p.m., Monday through Friday. Copying of documents may be arranged through the Los Angeles Regional Board by calling (213) 576-6600.

## **E. Register of Interested Persons**

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Regional Board, reference this facility, and provide a name, address, and phone number.

## **II. Introduction**

Ventura Port District operates a boat launch and washdown facility located at 1703 Anchors Way Drive, Ventura California. The facility is permitted to discharge up to 100 gallons/day of boat

washdown water to the Ventura Marina, a water of the United States. The wastewater flows through a clarifier before being discharged to the marina immediately adjacent to the boat ramp (Latitude 34° 14' 58", Longitude 119° 15' 43"). Ventura Port District currently discharges wastewater from boat washdown operations under waste discharge requirements (WDRs) contained in Order No. 96-080 adopted by the Regional Board on November 4, 1996, CI-6205.

The Discharger has filed a report of waste discharge (ROWD) and has applied for renewal of its individual NPDES.

**III. Description of Facility and Waste Discharge**

The treated boat wash down wastewater is discharged to the Ventura Marina. The location of the discharge outfall and the wash down area are shown on Figure 1:

Effluent limitations contained in Order 96-080 and the representative monitoring data are presented in the following table:

Constituent (units)	Existing Effluent Limitations		Discharge Conc. (March 2001 –June 2002)
	Daily Maximum	30-Day Average	Range
pH	6.5-8.5	--	7.2 – 7.3
Temperature	100°F	---	66 –71
Oil and Grease (mg/L)	15	10	4 -41
BOD <sub>5</sub> (mg/L)	30	20	2.6 - 21
Total suspended solids (mg/L)	150	50	10 - 30
Total coliform (MPN/100 mL)	---	---	1600
Fecal Coliform (MPN/100 mL)	---	---	17 –1600

Under the previous permit, the discharger reported violations of established 30-day average effluent limit for oil and grease of 15 in August 1997 with a detected value of 41 mg/L. The 30-day average effluent limit for BOD (20 mg/L) was exceeded in May 2002 with a detected level of 21 mg/L. The December 1996 monitoring data utilized a detection limit of 24 for BOD, hence compliance with the monthly limit for this sample could not be verified. This permit also required quarterly monitoring for total coliform. This data indicates a chronic problem with both total and fecal coliform with concentrations exceeding 1600 MPN/100 ml in most of the samples collected. The receiving water daily maximum limit for total and fecal coliform is 230 and 400 MPN/100mL, well below the detected concentrations discharged from the Ventura Port District boat wash area. Hence, this permit includes limits for both total and fecal coliform.

**IV. Applicable Plans, Policies, Laws, and Regulations**

The requirements contained in the proposed Order are based on the requirements and authorities contained in the following:

1. The Federal Clean Water Act (CWA). The federal Clean Water Act requires that any point source discharge of pollutants to a water of the United States must be done in conformance with an NPDES permit. NPDES permits establish effluent limitations that incorporate various requirements of the CWA designed to protect water quality.
2. Title 40, Code of Federal Regulations (40 CFR) – Protection of Environment, Chapter 1, Environmental Protection Agency, Subchapter D, Water Programs, Parts 122-125 and Subchapter N, Effluent Guidelines. These CWA regulations provide effluent limitations for certain dischargers and establish procedures for NPDES permitting, including how to establish effluent limitations, for certain pollutants discharged.
3. On June 13, 1994, the Regional Board adopted a revised *Water Quality Control Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). The Basin Plan contains water quality objectives and beneficial uses for inland surface waters and for the Pacific Ocean. The receiving waters for the permitted discharge covered by this permit is the Ventura Marina, a water of the United States. The beneficial uses listed in the Basin Plan for the Ventura Marina are:

Existing: industrial service supply, navigation, contact and noncontact recreation, commercial and sport fishing, marine habitat, wildlife habitat, and shellfish harvesting.

4. The State Water Resources Control Board (State Board) adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (Thermal Plan) on May 18, 1972, and amended this plan on September 18, 1975. This plan contains temperature objectives for inland surface waters.
5. On May 18, 2000, the U.S. Environmental Protection Agency (USEPA) promulgated numeric criteria for priority pollutants for the State of California [known as the *California Toxics Rule* (CTR) and codified as 40 CFR 131.38]. In the CTR, USEPA promulgated criteria that protect the general population at an incremental cancer risk level of one in a million ( $10^{-6}$ ), for all priority toxic pollutants regulated as carcinogens. The CTR also provides a schedule of compliance not to exceed 5 years from the date of permit renewal for an existing discharger if the Discharger demonstrates that it is infeasible to promptly comply with the CTR criteria.
6. On March 2, 2000, the State Board adopted the *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Policy or SIP). The SIP was effective on April 28, 2000, with respect to the priority pollutant criteria promulgated for California by the USEPA through the National Toxics Rule (NTR), and to the priority pollutant objectives established by the Regional Boards in their basin plans, with the exception of the provision on alternate test procedures for individual discharges that have been approved by the USEPA Regional Administrator. The alternate test procedures provision was effective on May 22, 2000. The SIP was effective on May 18, 2000, with respect to the priority pollutant criteria promulgated by the USEPA through the CTR. The SIP requires the dischargers' submittal of data sufficient to conduct the determination of priority pollutants requiring water quality-based effluent limitations (WQBELs) and to calculate the effluent limitations. The CTR criteria for saltwater

or human health for consumption of organisms, whichever is more stringent, are used to develop the effluent limitations in this Order to protect the beneficial uses of the Channel Islands Harbor and the Edison Canal Estuary.

7. 40 CFR section 122.44(d)(vi)(A) requires the establishment of numeric effluent limitations to attain and maintain applicable narrative water quality criteria to protect the designated beneficial uses. Where numeric water quality objectives have not been established in the Basin Plan, 40 CFR section 122.44(d) specifies that WQBELs may be set based on USEPA criteria and supplemented, where necessary, by other relevant information to attain and maintain narrative water quality criteria to fully protect designated beneficial uses.
8. State and Federal antibacksliding and antidegradation policies require Regional Board actions to protect the water quality of a water body and to ensure that the waterbody will not be further degraded. The antibacksliding provisions are specified in section 402(o) of the CWA and in 40 CFR, section 122.44(l). Those provisions require a reissued permit to be as stringent as the previous permit with some exceptions where effluent limitations may be relaxed.
9. Effluent limitations are established in accordance with sections 301, 304, 306, and 307 of the CWA, and amendments thereto. These requirements, as they are met, will maintain and protect the beneficial uses of the Channel Islands Harbor and the Edison Canal Estuary.
10. Existing waste discharge requirements contained in Board Order No. 96-080, were used to regulate discharges from the Ventura Port District. In some cases, permit conditions (effluent limitations and other special conditions) established in the existing waste discharge requirements have been carried over to this permit.

## **V. Regulatory Basis for Effluent Limitations**

The CWA requires point source discharges to control the amount of conventional, nonconventional, and toxic pollutants that are discharged into the waters of the United States. The control of the discharge of pollutants is established through NPDES permits that contain effluent limitations and standards. The CWA establishes two principal bases for effluent limitations. First, dischargers are required to meet technology-based effluent limitations that reflect the best controls available considering costs and economic impact. Second, they are required to meet WQBELs that are developed to protect applicable designated uses of the receiving water.

The CWA requires that technology-based effluent limitations be established based on several levels of controls:

- Best practicable treatment control technology (BPT) is based on the average of the best performance by plants within an industrial category or subcategory. BPT standards apply to toxic, conventional, and nonconventional pollutants.

- Best available technology economically achievable (BAT) represents the best existing performance of treatment technologies that are economically achievable within an industrial point source category. BAT standards apply to toxic and nonconventional pollutants.
- Best conventional pollutant control technology (BCT) is a standard for the control from existing industrial point sources of conventional pollutants including BOD, TSS, fecal coliform, pH, and oil and grease. The BCT standard is established after considering the “cost reasonableness” of the relationship between the cost of attaining a reduction in effluent discharge and the benefits that would result, and also the cost effectiveness of additional industrial treatment beyond BPT.
- New source performance standards (NSPS) that represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that represent state-of-the-art treatment technology for new sources.

The CWA requires EPA to develop effluent limitations, guidelines and standards (ELGs) representing application of BPT, BCT, BAT, and NSPS. Section 402(a)(1) of the CWA and 40 CFR 125.3 of the NPDES regulations authorize the use of best professional judgment (BPJ) to derive technology-based effluent limitations on a case-by-case basis where ELGs are not available for certain industrial categories and/or pollutants of concern.

If a reasonable potential exists for pollutants in a discharge to exceed water quality standards, WQBELs are also required under 40 CFR 122.44(d)(1)(i). WQBELs are established after determining that technology-based limitations are not stringent enough to ensure that state water quality standards are met for the receiving water. WQBELs are based on the designated uses of the receiving water, water quality criteria necessary to support the designated uses, and the state’s antidegradation policy. For discharges to inland surface waters, enclosed bays, and estuaries, the SIP establishes specific implementation procedures for determining reasonable potential and establishing WQBELs for priority pollutant criteria promulgated by USEPA through the CTR and NTR, as well as the Basin Plan.

There are several other specific factors affecting the development of limitations and requirements in the proposed Order. These are discussed as follows:

#### **1. Pollutants of Concern**

The CWA requires that any pollutant that may be discharged by a point source in quantities of concern must be regulated through an NPDES permit. Further, the NPDES regulations and SIP require regulation of any pollutant that (1) causes; (2) has the reasonable potential to cause; or (3) contributes to the exceedance of a receiving water quality criteria or objective. The SIP includes provisions for priority pollutant criteria promulgated by USEPA in the CTR and NTR, and for those priority pollutants outlined in the Basin Plan.

Effluent limitations in the current permit were established for conventional pollutants only. Chemicals of concern (COCs) typically associated with boat washing operations include

metals (from paint chips) and total petroleum hydrocarbons (TPH). A preliminary review of the data submitted for discharges from the site indicates that the concentrations of two priority pollutants (copper, and zinc) may exceed the effluent limits. This finding is based on one data point. This data is insufficient to establish interim limits for these contaminants; hence this Order includes requirements for monitoring of these and other COCs.

Previous samplings of the effluent have consistently yielded exceedances of the Basin Plan limits for total and fecal coliform. The presence of the elevated levels of these contaminants may be associated with illegal dumping into the boat wash area and or clarifier. The area around the boat wash has been posted to deter dumping and management is evaluating the feasibility of implementing other restrictions. In an effort to control the amount of the contaminant discharged to the Ventura Marina, this Order includes limits for both total and fecal coliform.

## **2. Technology-Based Effluent Limitations**

This Discharger has enrolled in and complies with all provisions of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, National Pollutant Discharge Elimination System (NPDES) *General Permit No. CAS000001 (General Permit) Waste Discharge Requirements (WDRS) for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities*. The General Permit includes requirements to develop and implement a Storm Water Pollution Prevention Plan (SWPPP) along with Best Management Practices (BMPs) that will prevent all chemicals of concern (COCs) from contacting storm water and with the intent of keeping them from moving off site into receiving waters.

Due to the lack of national effluent limitation guidelines (ELGs) for boatwash operations and the absence of data available to apply BPJ, and pursuant to 40 CFR 122.44(k), the Regional Board will require the Discharger to develop and implement a *Best Management Practices Plan* (BMPP). The purpose of the BMPP is to establish site-specific procedures that will prevent the discharge of pollutants in treated groundwater. The BMPP should also address non-storm water discharges from outside the facility. In particular, the facility must ensure the discharge of pollutants associated with all onsite activities including equipment operation, equipment maintenance, vehicular entry and exit is minimized. The combination of the SWPPP and BMPP and existing permit limitations based on past performance and reflecting BPJ will serve as the equivalent of technology-based effluent limitations, in the absence of established ELGs, in order to carry out the purposes and intent of the CWA.

## **3. Water Quality-Based Effluent Limitations**

As specified in 40 CFR 122.44(d)(1)(i), permits are required to include WQBELs for toxic pollutants (including toxicity) that are or may be discharged at levels which cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses for the receiving water as

specified in the Basin Plan, and achieve applicable water quality objectives and criteria (that are contained in other state plans and policies, or USEPA water quality criteria contained in the CTR and NTR). The specific procedures for determining reasonable potential, and if necessary for calculating WQBELs, are contained in the SIP.

The CTR contains both saltwater and freshwater criteria. According to 40 CFR 131.38(c)(3), freshwater criteria apply at salinities of 1 part per thousand (ppt) and below at locations where this occurs 95 percent or more of the time; saltwater criteria apply at salinities of 10 ppt and above at locations where this occurs 95 percent or more of the time; and at salinities between 1 and 10 ppt the more stringent of the two apply. The CTR criteria for saltwater or human health for consumption of organisms, whichever is more stringent, are used to prescribe the effluent limitations in this Order to protect the beneficial uses of the Ventura Marina.

**(a) Reasonable Potential Analysis (RPA)**

In accordance with Section 1.3 of the SIP, the Regional Board will conduct a reasonable potential analysis (RPA) for each priority pollutant with an applicable criterion or objective to determine if a WQBEL is required in the permit. The Regional Board would analyze effluent data to determine if a pollutant in a discharge has a reasonable potential to cause or contribute to an excursion above a state water quality standard. For all parameters that have a reasonable potential, numeric WQBELs are required. The RPA considers water quality objectives outlined in the CTR, NTR, as well as the Basin Plan. To conduct the RPA, the Regional Board must identify the maximum observed effluent concentration (MEC) for each constituent, based on data provided by the Discharger.

Section 1.3 of the SIP provides the procedures for determining reasonable potential to exceed water applicable water quality criteria and objectives. The SIP specifies three triggers to complete a RPA:

- 1) Trigger 1 – If the MEC is greater than or equal to the CTR water quality criteria or applicable objective (C), a limitation is needed. For certain constituents present in this discharge that were nondetect, the MEC was set at the method detection limit consistent with section 1.3 of the SIP.
- 2) Trigger 2 – If  $MEC < C$  and background water quality (B)  $> C$ , a limitation is needed.
- 3) Trigger 3 – If other related information such as CWA 303(d) listing for a pollutant, discharge type, compliance history, etc. indicates that a WQBEL is required.

Sufficient effluent and ambient data are needed to conduct a complete RPA. If data are not sufficient, the Discharger will be required to gather the appropriate data for the Regional Board to conduct the RPA. Upon review of the data, and if the Regional Board determines that WQBELs are needed to protect the beneficial uses, the permit will be reopened for appropriate modification.

**(b) Calculating WQBELs**

If a reasonable potential exists to exceed applicable water quality criteria or objectives, then a WQBEL must be established in accordance with one of three procedures contained in Section 1.4 of the SIP. These procedures include:

- 1) If applicable and available, use of the wasteload allocation (WLA) established as part of a total maximum daily load (TMDL).
- 2) Use of a steady-state model to derive maximum daily effluent limitations (MDELs) and average monthly effluent limitations (AMELs).
- 3) Where sufficient effluent and receiving water data exist, use of a dynamic model, which has been approved by the Regional Board.

**(c) Impaired Water Bodies in 303 (d) List**

Section 303(d) of the CWA requires states to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations on point sources. For all 303(d) listed water bodies and pollutants, the Regional Board plans to develop and adopt TMDLs that will specify WLAs for point sources and load allocations (LAs) for non-point sources, as appropriate.

The USEPA has approved the State's 303(d) list of impaired water bodies. Certain receiving waters in the Los Angeles and Ventura County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 1998 303(d) list and have been scheduled for TMDL development.

The Ventura Marina is a small craft harbor located between the mouths of the Ventura and Santa Clara Rivers. It is home to numerous small boats and two boatyards. The "Ventura Keys" area of the marina is a residential area situated along three canals adjacent to the Ventura Marina. The marina is surrounded by agricultural land and a large unlined ditch drains into the Keys area. Since the marina is between the mouths of two rivers which discharge large sediment loads from relatively undeveloped watersheds, the marina has a constant problem with keeping the entrance channel open.

The marina (in the Keys area) is on the 1998 303(d) list for coliform problems. The State Mussel Watch Program also found moderately elevated levels of metals, DDT, and chlordane in the marina from sampling conducted in the late 1980's.

**(d) Whole Effluent Toxicity**

Whole Effluent Toxicity (WET) protects the receiving water quality from the aggregate toxic effect of a mixture of pollutants in the effluent. WET tests measure the degree of response of exposed aquatic test organisms to an effluent. The WET approach allows for protection of the narrative “no toxics in toxic amounts” criterion while implementing numeric criteria for toxicity. There are two types of WET tests: acute and chronic. An acute toxicity test is conducted over a short time period and measures mortality. A chronic toxicity test is conducted over a longer period of time and measures mortality, reproduction, and growth.

The Basin Plan specifies a narrative objective for toxicity, requiring that all waters be maintained free of toxic substances in concentrations that are lethal to or produce other detrimental response on aquatic organisms. Detrimental response includes but is not limited to decreased growth rate, decreased reproductive success of resident or indicator species, and/or significant alterations in population, community ecology, or receiving water biota. The existing permit does not contain toxicity limitations or monitoring requirements.

In accordance with the Basin Plan, acute toxicity limitations dictate that the average survival in undiluted effluent for any three consecutive 96-hour static or continuous flow bioassay tests shall be at least 90%, with no single test having less than 70% survival. Consistent with Basin Plan requirements, this Order includes acute toxicity limitations.

In addition to the Basin Plan requirements, Section 4 of the SIP states that a chronic toxicity effluent limitation is required in permits for all discharges that will cause, have the reasonable potential to cause, or contribute to chronic toxicity in receiving waters.

The discharges from the Ventura Port Authority will occur all year with significant decreases in the discharges during the winter months. The Discharger will be required to conduct chronic toxicity testing. The Order includes a chronic testing trigger hereby defined as an exceedance of 1.0 toxic units chronic (TU<sub>c</sub>) in a critical life stage test for 100% effluent. (The monthly median for chronic toxicity of 100% effluent shall not exceed 1.0 TU<sub>c</sub> in a critical life stage test.) If the chronic toxicity of the effluent exceeds 1.0 TU<sub>c</sub>, the Discharger will be required to immediately implement accelerated chronic toxicity testing according to Monitoring and Reporting Program, Item IV.D.1. If the results of two of the six accelerated tests exceed 1.0 TU<sub>c</sub>, the Discharger shall initiate a toxicity identification evaluation (TIE).

**4. Specific Rationale for Each Numerical Effluent Limitation**

Section 402(o) of the Clean Water Act and 40 CFR 122.44(l) require that effluent limitations standards or conditions in re-issued permits are at least as stringent as in the existing permit. Using a limited data set, the Regional Board has determined that reasonable potential exists for two priority pollutants; copper and zinc. Since there is only one data point to characterize the discharge it is not possible to determine what a

reasonable interim limit would be for these constituents. Therefore this permit includes a requirement to monitor monthly for both copper and zinc and for several other heavy metals expected to be present in the discharges from the site.

In compliance with 40 CFR 122.45(f), mass-based limitations have also been established in the proposed Order for conventional and priority pollutants.

When calculating the mass for discharges, the appropriate flow, daily maximum for daily maximum mass calculations, and the monthly average flowrate when calculating the monthly average mass should be substituted in the following equation.

$$\text{Mass (lbs/day)} = \text{flow rate (MGD)} \times 8.34 \times \text{effluent limitation (mg/L)}$$

where: mass = mass limit for a pollutant in lbs/day  
 effluent limitation = concentration limit for a pollutant, mg/L  
 flow rate = discharge flow rate in MGD

The following table provides the final effluent limitations.

Constituent (units)	Discharge Limitations		Rationale <sup>1</sup>
	Daily Maximum Concentration	Monthly Average Concentration	
pH	6.5 – 8.5	---	BP
Temperature	100°F	---	TP
Oil and Grease (mg/L)	15	10	EP
BOD <sub>5</sub> (mg/L)	30	20	EP
Total suspended solids (mg/L)	150	50	EP
Turbidity (NTU)	150	50	BPJ
Settleable solids (ml/L)	0.3	0.1	EP
MBAS (mg/L)	0.5	---	BP
Fecal coliform (1/100ml)	400	200	BP
Total coliform	230	70	BP

<sup>1</sup> EP = Existing Permit, BP = Basin Plan, TP = Thermal Plan, BPJ = Best Professional Judgement.

There are very little data to perform a reasonable potential analysis for most of the toxic parameters. In such circumstance, the SIP recommends that additional data is gathered prior to permit issuance, or that additional data is gathered during the term of the permit.

The data available was used to perform an RPA for discharges from the site. The RPA indicates that two constituents (copper, and zinc) have the potential to exceed the CTR based WQELs prescribed in the table above. Hence, interim monitoring requirements have been prescribed for these constituents.

This permit, includes limits for all of the constituents included in the previous order along with a requirement to monitor the 126 priority pollutants bimonthly. Monitoring requirements are discussed in greater detail in Section III, of the Monitoring and Reporting Program CI-6205.

## 5. **Monitoring Requirements**

For regulated parameters, the previous permit for Ventura Port Authority required quarterly monitoring for conventional pollutants including suspended solids, BOD, oil and grease, and total and fecal coliform. The previous Order did not include any requirements for monitoring of the priority pollutants. According to Section 1.3 of the SIP, if data are unavailable or insufficient to conduct the RPA, the Regional Board must establish interim requirements that require additional monitoring for the pollutants in place of a WQBEL. Upon completion of the required monitoring, the Regional Board must use the gathered data to conduct the RPA and determine if a WQBEL is required. As prescribed in the Monitoring and Reporting Program, the Regional Board shall require periodic monitoring for pollutants for which criteria or objectives apply and for which no effluent limitations have been established.

Priority pollutants have only been monitored during one sampling event at the Ventura Port Authority. This Order includes requirements to monitor priority pollutants semiannually, and requirements to monitor many of the potential COCs monthly.

### ***(a) Effluent Monitoring***

To demonstrate compliance with effluent limitations established in the permit, more frequent monitoring requirements from the existing permit will be applied to the reissued permit. Monitoring data collected during the previous permit term suggest that the discharge has routinely exceeded established effluent limitations for total and fecal coliform. Therefore, the Board has included limits for these constituents and is requiring monthly monitoring to ensure compliance with established effluent limitations. The data also indicates the potential for exceedances for two metals; copper and zinc. This order includes requirements for monthly monitoring of copper and zinc as well as other heavy metals routinely associated with boat washing and maintenance operations. The monitoring schedule stipulated in the Order is effective upon adoption of the Order by the Regional Board.

### ***(b) Receiving Water Monitoring***

The Discharger will be required to perform general observations of the receiving water when discharges occur during the receiving water monitoring event and report the observations in the quarterly monitoring report. The Regional Board in assessing potential impacts of future discharges will use data from these observations. If no discharge occurred during the observation period, this shall be reported. Observations shall be descriptive where applicable, such that colors, approximate amounts, or types of materials are apparent.

***(c) Storm Water Monitoring***

The Discharger shall implement the requirements of the State Water Resources Control Board Water Quality Order No. 97-03-DWQ, National Pollutant Discharge Elimination System (NPDES) *General Permit No. CAS000001 (General Permit) Waste Discharge Requirements (WDRS) for Discharges of Storm Water Associated with Industrial Activities Excluding Construction Activities*. This Order includes requirements to develop, implement, and update as required the Storm Water Pollution Prevention Plan (SWPPP) along with Best Management Practices (BMPs) that will prevent all chemicals of concern from contacting storm water and with the intent of keeping all COC from moving off site into receiving waters.