

## **California Regional Water Quality Control Board**

Los Angeles Region Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful



Linda S. Adams ncy Secretary 320 W. 4th Street, Suite 200, Los Angeles, California 90013 Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.waterboards.ca.gov/losangeles Arnold Schwarzenegger Governor

March 9, 2007

Mr. Jeff Pratt, Director Ventura County Watershed Protection District 800 South Victoria Ave. Ventura, CA 93009-1600 Certified Mail Return Receipt Requested Claim No. 7005 0390 0000 4141 1951

REQUEST FOR INFORMATION – MUNICIPAL STORM WATER MONITORING PROGRAM FOR THE COUNTY OF VENTURA, CA - NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM MUNICIPAL STORM WATER DISCHARGE PERMIT FOR THE VENTURA COUNTY WATERSHED PROTECTION DISTRICT, COUNTY OF VENTURA AND THE INCORPORATED CITIES THEREIN (NPDES No. CAS004001, ORDER No. 01-108).

Dear Mr. Pratt:

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board), is the public agency with primary responsibility for the protection of ground and surface water quality for all beneficial uses within the County of Ventura. The Ventura County Municipal Separate Storm Sewer System Permit (MS4 Permit) of which the Ventura County Watershed Protection District is the Principal Permittee, prohibits discharges from the MS4 that cause or contribute to the violation of water quality standards or objectives (Order No. 01-108, Part 2 - Receiving Water Limitations).

The MS4 Permit directs implementation of a Countywide Storm Water Quality Management Program, which includes a Countywide Monitoring Program (Monitoring Program) to assess compliance with permit provisions and evaluate implementation progress. The Monitoring Program has been in effect for several years in the County of Ventura and Permittees report exceedences of several of the same water quality objectives year after year in receiving waters, without being able to identify and eliminate the sources of the exceedence(s). Without differentiation of sources from the Permittee's MS4s, the application of appropriate best management practices (BMPs) to reduce the discharge of pollutants of concern to the maximum extent practicable (MEP) is unattainable. An example of such occurrences by Permittees' include beach postings in the County of Ventura, Cities of Oxnard, Port Hueneme and San Buenaventura due to the repeated exceedence of bacterial objectives set in order to fully protect water contact recreation (REC-1).

California Environmental Protection Agency

March 9, 2007

Mr. Pratt, Director - 2 of 2 -Ventura County Watershed Protection District

In order for the Permittee's to provide the information necessary to assess their compliance status relative to the MS4 permit requirements as written in the December 2006 draft Ventura County MS4 Permit (draft MS4 Permit), urban storm water discharge (drainage systems/ outfalls) sampling needs to be conducted. Direct analyses of urban storm water discharge will assess the effectiveness of implementation of draft MS4 Permit requirements on storm water quality. An integrated approach for separate monitoring of mass emissions from urbanized areas to identify sources of pollutants to obtain compliance with general program and Total Maximum Daily Load requirements will also be necessary.

The Los Angeles Water Board, by this letter requests that the Ventura County Watershed Protection District submit a revised comprehensive Monitoring Program that will enable Permittees, other interested parties, and the Los Angeles Water Board to better evaluate compliance with permit provisions contained in the draft MS4 Permit, and to ensure that MS4 discharges are not causing or contributing to the exceedances of water quality objectives. We suggest that the Monitoring Program include the monitoring of representative MS4 drainage systems transporting at a minimum, 60 percent or more of flow from each of the MS4 Permittee's jurisdictional drainage areas that flow into the five Watershed Management Areas within the County of Ventura. Please submit the requested information to the Regional Board, attention of Dr. Xavier Swamikannu, Storm Water Permitting Program, no later than May 11, 2007.

If you have any questions, please contact Dr. Xavier Swamikannu at (213) 620-2094 or via e-mail at xswamikannu @waterboards.ca.gov.

Sincerely,

Jonathan S. Bishop Executive Officer

cc: Mr. Michael Levy Esq., Office of the Chief Counsel, State Water Resources Control Board Ms. Jennifer Fordyce, Office of the Chief Counsel, State Water Resources Control Board Mr. Bruce Fujimoto, Division of Water Quality, State Water Resources Control Board

California Environmental Protection Agency