

# Comments on the Second Draft Ventura County MS4 Permit



September 20, 2007

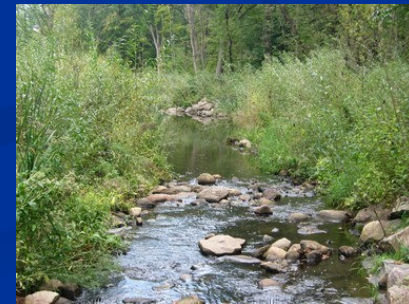
# Municipal Action Levels

## Includes:

- pH
- TSS
- COD
- Nutrients
- Total Metals

## Missing:

- OP pesticides
- PAHs
- Chlorides
- Bacteria



**MALs are Seriously Flawed...**

# MALs vs. CTR Criteria

Parameter	Proposed MAL (ug/L)	CTR Acute Criterion(ug/L)	CTR Chronic Criterion(ug/L)
Total Cu	70.7	13.5	9.38
Total Pb	62.2	82.17-110	3.16-4.24
Total Ni	19.2	470.9	52.16
Total Zn	756	122.7	121.7

# SW Quality Management Program Implementation

- “All storm water treatment BMPs implemented under the MEP provisions of this order shall be designed to achieve, at a minimum, a storm water discharge effluent quality for the water quality design storm, equal to the pollutant MALs...”

# Biofilters

Parameter	Effluent Percentiles (ug/L)		
	10th	50th	95th
Cd, total	0.149	0.206	1.258
Cu, total	2.656	7.984	44.607
Pb, total	1	4.157	66.517
Nitrate + Nitrite, total	0.174	0.611	2.215
N, Kjeldahl, total	0.633	1.342	6.378
P, total	0.056	0.24	1.167
TSS	3.043	20.027	233.464
Zn, total	6.395	30.256	181.275

Proposed MAL	unit
7.34	ug/L
70.7	ug/L
62.2	ug/L
1.16	mg/L
3.5	mg/L
0.82	mg/L
211	mg/L
756	ug/L

Credit: Geosyntec Consultants

# Hydrodynamic Devices

Parameter	Effluent Percentiles (ug/L)		
	10th	50th	95th
Cd, total	0.038	0.382	5.047
Cu, total	3.34	15.409	38.55
Pb, total	1.351	6.297	42.576
Nitrate + Nitrite, total	0.078	0.226	0.707
N, Kjeldahl, total	0.351	1.086	5.984
P, total	0.023	0.148	2.612
TSS	5.543	43.173	303.15
Zn, total	17.793	69.089	291.03

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Credit: Geosyntec Consultants

# Municipal Storm Water Discharge Limitations

- “A running average of twenty percent or greater of exceedences of any MAL will create a presumption that the Permittees have not complied with the MEP provision...”



**Recommendation...**

# Performance Criteria

Parameter	Effluent Percentiles (ug/L)		
	10th	50th	95th
Cd, total	0.038	0.382	5.047
Cu, total	3.34	15.409	38.55
Pb, total	1.351	6.297	42.576
Nitrate + Nitrite, total	0.078	0.226	0.707
N, Kjeldahl, total	0.351	1.086	5.984
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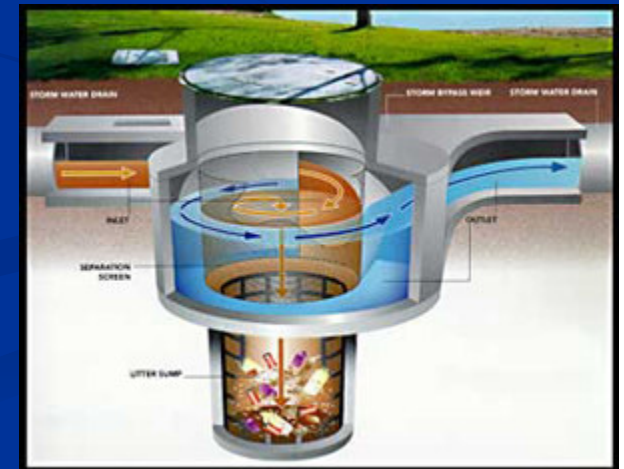
Credit: Geosyntec Consultants

# Performance Criteria

The Order is intended “to reduce the discharge of pollutants in storm water to the MEP and achieve water quality objectives....”

## Proposed Change:

- Add performance based criteria based on the 50th percentile performance
- 25% if RWL exceedence



# TMDLs and Waste Load Allocations (WLAAs)

- “Each Permittee shall implement programs and measures to comply with TMDLs’ WLAAs for the MS4 as follows:
  - (a) Storm Water Discharges – achieve the concentration or load based numerical limitation or its **BMPs expression** for wet weather discharge...or implement the **BMPs which have a reasonable expectation**, when fully implemented, to achieve the WLAAs...”

# TMDLs (cont.)

## Missing TMDLs:

- Calleguas Creek Nitrogen TMDL
- Calleguas Creek Chloride TMDL
- Santa Clara Chloride TMDL
- Malibu Creek Nutrients TMDL
- Calleguas Creek Metals and Selenium TMDL



# TMDLs (cont.)

## Missing Implementation Requirements:

- Interim WLAs
- Monitoring Program
- Required Special Studies
- Annual Progress Reports
- Work plans

Attachment A to Resolution No. R4-2006-012

**Table 7-19.2 Calleguas Creek Watershed Metals and Selenium TMDL:  
Implementation Schedule**

Item	Implementation Action <sup>1</sup>	Responsible Party	Completion Date
1	Effective date of interim Metals and Selenium TMDL waste load allocation (WLAs), and final WLAs for other NPDES permittees	POTWs, Permitted Stormwater Dischargers <sup>2</sup> (PSD), Other NPDES Permittees	Effective date of the amendment
2	Effective date of interim Metals and Selenium TMDL load allocation (LAs)	Agricultural Dischargers	Effective date of the amendment
3a	Submit Calleguas Creek Watershed Metals and Selenium Monitoring Program	POTWs, PSD, Agricultural Dischargers	Within 3 months after the effective date of the amendment
3b	Implement Calleguas Creek Watershed Metals and Selenium Monitoring Program	POTWs, PSD, Agricultural Dischargers	Within 3 months of Executive Officer approval of the monitoring program
3c	Re-calibrate HSPF water quality model based on first year of monitoring data	POTWs, PSD, Agricultural Dischargers	1 year after submittal of first annual monitoring report
4a	Conduct a source control study, develop and submit an Urban Water Quality Management Program (UWQMP) for copper, mercury, nickel, and selenium	MS4s	Within 2 years after the effective date of the amendment
4b	Conduct a source control study, develop and submit an UWQMP for copper, mercury, nickel, and selenium	Caltrans	Within 2 years after the effective date of the amendment
4c	Conduct a source control study, develop and submit an UWQMP for copper, mercury, nickel, and selenium	NAWS point Mugu (US Navy)	Within 2 years after the effective date of the amendment
5	Implement UWQMP	PSD	Within 1 year of approval of UWQMP by the Executive Officer
6	Develop and submit an Agricultural Water Quality Management Program (AWQMP) as described in the Conditional Waiver Program	Agricultural Dischargers	Within 2 years after the effective date of the amendment
7	Implement AWQMP	Agricultural Dischargers	Within 1 year of approval of AWQMP by the Executive Officer
8	Develop WLAs and LAs for zinc if impairment for Mugu Lagoon is maintained on the final 2006 303(d) list	Regional Board or USEPA	Within 1 year of the final 2006 303(d) list
9	Submit progress report on salinity management plan, including status of reducing WRP effluent discharges to Conejo and Calleguas Creek reaches of the watershed	POTWs	Within 3 years after the effective date of the amendment
10	If progress report identifies the effluent discharges reduction is not progressing, develop and	POTWs	Within 4 years after the effective date of the

# Monitoring

## Prohibitions:

- Discharges causing or contributing to a condition of pollution, contamination or nuisance
- Discharges causing or contributing to exceedences of receiving water quality objectives



# Monitoring Objectives

- Assess impacts on receiving water
- Assess overall health of receiving water and long-term trends
- Assess compliance with effluent limits and WQOs



# Monitoring (cont.)

- 3-5 mass emission stations
- Tributary stations (**removed**)
- Bioassessment (**removed**)

## Proposed Action:

- Include tributary and bioassessment monitoring
- Increase number of locations
- Define “major outfall”
- Conform with toxicity Requirements in SMBRC Guidance Document

