

**Shelter Island Yacht Basin Copper Total Maximum Daily Load (TMDL)**

Resolution:	R9-2005-0019
Effective Date:	December 2, 2005
Impaired Water Body:	San Diego Bay northern portion defined by Shelter Island Yacht Basin (SIYB). <sup>1</sup>
Pollutant:	Dissolved Copper
Responsible Dischargers:	Dischargers within the SIYB Copper TMDL watershed area boundaries which are defined by the watershed drainage area to the SIYB of the Point Loma HA (908.10) and the SIYB portion of San Diego Bay.
Required Actions:	Dischargers in compliance with Industrial General Permit Order No. 2014-0057-DWQ (General Permit) meet the requirements of the SIYB Copper TMDL. The Regional Water Board may require Dischargers to implement additional actions to reduce dissolved copper discharges based on a site-specific analysis.
TMDL documents are available at: <a href="http://www.waterboards.ca.gov/sandiego/water_issues/programs/watershed/souwatershed.shtml#siybtmdl">http://www.waterboards.ca.gov/sandiego/water_issues/programs/watershed/souwatershed.shtml#siybtmdl</a>	

**Fact Sheet for Shelter Island Yacht Basin (SIYB) Copper TMDL**

**Background**

The SIYB Copper TMDL addresses the Clean Water Act section 303(d) impairment for acute and chronic toxicity impacts related to dissolved copper in SIYB. At relatively low concentration levels copper is toxic to aquatic organisms. Copper also tends to accumulate in sediment, threatening the benthic life at the SIYB. Copper based anti-fouling paints applied and maintained on the hulls of boats moored in the marinas of SIYB were identified as the primary source of dissolved copper in the SIYB. A source analysis for copper in SIYB indicates that urban runoff is an insignificant source of copper to SIYB.<sup>2</sup> Sources of copper loading in urban runoff include brake pads, tires, water pipe leaching, architectural structures, and other industrial sources and activities. Background sources and nonpoint sources of copper are insignificant.<sup>3</sup>

<sup>1</sup> The SIYB is a semi-enclosed basin located at the north end of San Diego Bay near the Bay's mouth which in turn opens up to the Pacific Ocean

<sup>2</sup> Resolution No.R9-2005-0019, Finding 7

<sup>3</sup> Resolution No.R9-2005-0019 Technical Report, p. 22

The SIYB is home to ten recreational marinas and yacht clubs with facilities that are potentially sources of copper loading to SIYB. These facilities include the anchorage, fuel dock, various boat maintenance activities (i.e. painting) and other industrial activities that involve storage or use of copper sources.

The SIYB Copper TMDL identifies the following dischargers responsible for point source discharges of copper to the SIYB: Municipal Separate Storm Sewer System (MS4s), industrial dischargers (SIYB marina owners and operators), persons owning boats moored in the SIYB, and SIYB underwater hull cleaners.<sup>4</sup>

#### TMDL Waste Load Allocation

Dischargers are included in the waste load allocations (WLAs) for urban runoff. The WLA for urban runoff is set at the SYIB Copper TMDL current loading of 30 kg/year of copper.<sup>5</sup> The SIYB Copper TMDL does not require a reduction in current copper loads from urban runoff because urban runoff is a relatively insignificant source of copper contributing to the impairment. Because the San Diego Water Board has determined point source discharges of copper were largely discharged from municipal MS4s, the primary mechanism for meeting this TMDL is through the municipal MS4 NDPEs permit and municipal land use ordinances. Separate WLAs have not been assigned to industrial dischargers.

#### TMDL Requirements

Although Dischargers have not been assigned a separate WLA, Dischargers remain responsible for demonstrating that their discharges do not cause or contribute to exceedances of copper in the SIYB Copper TMDL watershed. Enrollment in this General Permit satisfies this requirement because Dischargers enrolled in the General Permit are not expected to cause or contribute to an exceedance of copper in copper impaired waters.

This General Permit requires Dischargers to take actions to control their risk of copper discharges. Dischargers shall identify all potential copper contributions from their site (section X.G), implement BMPs to reduce copper discharges (section X.H), sample discharges for copper (section XI.B.6), and conduct visual observations (section XI.A) as described in this General Permit. For Dischargers with coverage under the prior General Permit, the current General Permit requires that Dischargers implement an updated SWPPP in accordance with section X, by July 1, 2015. For Dischargers filing after July 1, 2015, the General Permit requires development of a SWPPP in accordance with section X. The update or development of a SWPPP for this General Permit satisfies the TMDL requirements because the General Permit requires enrolled Dischargers to

<sup>4</sup> Resolution No.R9-2005-0019 Finding 12

<sup>5</sup> Resolution No.R9-2005-0019, Attachment A, pp. 4-5

take actions to control their discharges of dissolved copper, monitor the effects of efforts to control pollutants, and report the outcomes. Additionally, non-storm water discharges are not authorized unless they meet the requirements as set forth in section IV.B of the General Permit.

#### Monitoring and Reporting

The TMDL states that municipal MS4s have the primary monitoring responsibility under the TMDL. To the extent Dischargers may be contributing copper loads into copper impaired waters, the General Permit's existing monitoring requirements are sufficient to identify significant sources. Dischargers that monitor the point(s) of discharge from their facility in accordance with this General Permit are in compliance with the necessary TMDL monitoring.

Visual observation monitoring conducted in compliance with section XI of this General Permit satisfies the monitoring requirements of the TMDL. During dry weather days, monthly visual observations shall be conducted in accordance with section XI.A of the General Permit. Monthly visual observations by Dischargers would identify unauthorized non-storm water discharges (NSWDS), potential sources of industrial pollutants, BMPs maintenance conditions, and authorized NSWDS. During wet weather sampling events, visual observations conducted in compliance with section XI.A must include identifying the presence of activities or materials that can contribute to copper concentrations from all discharge points from the Discharger's site. Once identified via visual observations, it is expected that the Discharger either minimizes or eliminates the presence of activities or materials that can contribute to copper concentrations in discharges from their industrial site.

Dischargers shall report results of all required monitoring annually as part of their Annual Report. Pursuant to section XVI of this General Permit, Annual Reports are due on or before July 15.

#### TMDL Compliance

In light of the General Permit's existing requirements, Dischargers in the SIYB watershed are assumed to be in compliance with the SIYB Copper TMDL and their contribution to the total WLA if all of the following are completed:

1. Enrollment in this General Permit; and
2. Inclusion of BMPs to reduce or control copper in the Discharger's SWPPP; and
3. Compliance with this General Permit.

The Regional Water Boards retain the authority to require Dischargers to revise their SWPPPs, ERA Reports, or monitoring programs as well as to direct a Discharger to

obtain an individual NPDES permit if additional controls on discharges of copper are necessary.

Watershed Coordination

Phase I MS4s in the SIYB Copper TMDL are implementing an adaptive management approach to improve water quality in the several Watershed Management Areas in the San Diego Bay Water Quality Improvement Plan. Coordinated efforts by all Responsible Parties will accelerate the waste load reductions required in the Shelter Island Copper TMDL and achieve the ultimate goal of improving water quality as soon as possible. Industrial dischargers are encouraged to coordinate with Phase I MS4s and other Responsible Parties to meet the Shelter Island TMDL WLA requirements using an adaptive management approach. Dischargers located within Shelter Island Yacht Basin are encouraged to contact that the San Diego Unified Port District and the City of San Diego's Storm Water Program Manager to collaborate.