

Industrial Environmental Association (IEA)



REGIONAL NPDES PERMIT FOR MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4s) DRAINING THE WATERSHEDS WITHIN THE SAN DIEGO REGION

**(TENTATIVE ORDER NO. R9-2013-0001, NPDES NO.
CAS0109266)**

IEA Overview



- Formed in 1983
- Promote responsible, cost-effective environmental laws and regulations
- Facilitate environmental compliance among members
- Provide education for community at large

Key Point: Monitoring Framework



- Generally support monitoring approach that is:
 - Strategic
 - Question-driven
 - Cost-effective
- Recognize more work required to ensure Permit monitoring provisions meet these needs

Non-stormwater Discharges



- Permitted NPDES discharges now specifically excluded from being considered illicit discharge
 - IEA supports clarifying language RWQCB added:
NPDES permitted discharges are not prohibited

Non-stormwater Discharges



- Firefighting discharges (non-emergency) considered illicit discharges
 - Building fire-suppression maintenance can be treated with BMPs
 - Allows discharge to not be a “significant source of pollutants”
 - Recommend retaining existing authorization for maintenance discharges when Copermittees require use of appropriate BMPs

Development Planning



- Hydromodification requirements
 - IEA disappointed the Regional MS4 Permit modifies the recently approved HMP
 - HMP painstakingly developed at great cost to Copermittees
 - ✦ HMP not yet fully vetted and evaluated

Development Planning



- At a minimum:
 - Return exemptions:
 - ✦ Highly urbanized watersheds
 - ✦ Discharges to concrete lined channels
 - ✦ San Diego Bay and other embayments and lagoons
 - Return baseline to “pre-project”

Development Inspections



- Existing development inspection provision revised to remove re-inspection for change in pollutant activities
 - IEA appreciates RWQCB staff revision on this issue
- Inspection methods need careful consideration
 - “Onsite inspections by volunteer monitoring or patrol programs”
 - ✦ Likely not feasible for many private property and/or industrial/commercial inspections