



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd, Ph.D.
Agency Secretary

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Arnold Schwarzenegger
Governor

July 15, 2005

Mr. Chris Crompton
County of Orange, Resources and Development Management Department
1750 South Douglass Road
Anaheim, CA 92806

SUBJECT: Approval of the Water Quality Monitoring Plan for the Areawide Urban Storm Water Runoff Permit, Order No. R8-2002-0010 (NPDES No. CAS 618030)

Dear Mr. Crompton:

Section III.3 of the Monitoring and Reporting Program (MRP) for the entitled municipal separate storm sewer system (MS4) permit, requires that the permittees develop and submit for approval by the Executive Officer, a revised Water Quality Monitoring Program. That program must, at a minimum, include the monitoring components listed in Section III.2.A-H of the MRP, or their equivalent and be capable, to the maximum extent practicable, of achieving the goals listed in Section II.1-9 of the MRP.

As a result of several meetings between County staff and Regional Board staff, the Water Quality Monitoring Program has been expanded to not only satisfy the requirements of the MS4 permit, but also include sampling stations and analytes required for the development and implementation of some of the Total Maximum Daily Loads (TMDLs) for impaired waters within Orange County.

Regional Board staff have reviewed the June 1, 2005 version of the Water Quality Monitoring Program and I hereby approve the proposed program with the final, minor changes noted in the enclosed list.

If you have any questions, you may call Mark Smythe at (951) 782-4998.

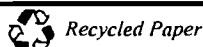
Sincerely,

for Gerard J. Thibeault
Executive Officer
Santa Ana Regional Water Quality Control Board

enclosure

cc (w/enc): Mr. Richard Boon, OC Resources and Development Management Department

California Environmental Protection Agency



Final Comments on Water Quality Monitoring Plan (based on June 1, 2005 version)

Page 3 – Section 1.2 – 1st paragraph

“... each of the monitoring program’s elements in turn...”

Page 5 – Section 1.3.2 – 2nd bullet

“... values occurring...”

Page 10 – Section 3.1 – Last paragraph

~~“With the agreement of the Board, this ... pollutant scans.”~~

Page 19-21 – Section 3.2

Benthic infauna sampling and analysis procedures need to be specified (see comment for Page 32 – Section 3.4.1.1, below).

Page 28 – Section 3.3 – 1st paragraph

“In addition, high levels of indicator bacteria...”. What constitutes ‘high’? The REC-1 water quality objective is 200 mpn/100 ml. Since this level would constitute a violation of water quality objectives in a designated REC-1 water, would that represent a ‘high’ value?

(included in previous comment letter)

Page 29 – Section 3.3.1.2

Los Trancos is currently diverted to the Orange County Sanitation District during the dry season and therefore adequate flows would not be expected during the primary use period.

El Moro Creek is not in the Santa Ana Region and should therefore not be included in the R8 water quality monitoring plan.

Please identify alternate waterbodies to replace these two.

Page 32 – Section 3.4.1.1 – 1st paragraph

The text states that the Fish & Game measurement methods are currently in flux. If the Permittees cannot be certain that those methodologies will be finalized prior to the implementation of this monitoring plan, specific, alternate methodologies must be identified in the plan to be used in the interim, prior to finalization by Fish & Game.

Page 34 – Section 3.4.1.2 – 1st paragraph

Last sentence is unnecessary as sites have already been selected (i.e., ~~Sites will be selected to ensure ... conditions~~).

Page 38/39 – Section 3.5.1.2

Note - Because the Regional Board oversees industrial facilities that may be responsible for illegal connections or illegal dumping, staff requests that in addition to contact with the appropriate Cities, the County provide to Regional Board staff (by email) monitoring data and identification of sites meeting the criteria for follow-up efforts. Further, because of possible future TMDLs or other issues, Regional Board staff would ask that concurrence be sought before monitoring locations are dropped.

Changes as follows:

“When the County has identified ... notify the appropriate City representative and Regional Board staff, that follow-up IC/ID efforts should be initiated. However, if the ... and the relevant inspector for that City and Regional Board staff will be notified immediately.”

“The County plans to deliver monitoring data to the cities and Regional Board staff as soon as it ... control checks.”

- ” ● An IC/ID effort has found the source of elevated values-
- There is concurrence by Regional Board staff.”