

**REGIONAL MONITORING WORKGROUP – MEETING SUMMARY**

County of San Diego  
5201 Ruffin Road, Suite P  
San Diego, CA 92123  
Tuesday, January 26, 2010  
10:00am – 12:00pm

Attendees:

<b>Name</b>	<b>Organization</b>
Andre Sonksen	City of San Diego
Todd Snyder	County of San Diego
Scott Norris	County of San Diego
David Pohl	Weston Solutions
David Renfrew	Weston Solutions
Phil Gibbons	Port of San Diego
Annie Hill	SDCRAA
Tim Murphy	City of Carlsbad
Marisa Soriano	City of Chula Vista
Kelly Barker	City of Del Mar (MOE)
Robert Griswold	City of El Cajon
Mayela Manasjan	City of Encinitas
Guy Nelson	City of Imperial Beach
Joe Kuhn	City of La Mesa
Crystal Grover	City of National City (D-MAX)
Helen Perry	City of Santee
Doug Coppi	City of Vista

**REGIONAL MONITORING**

Weston provided the group with the following updates on monitoring activities:

Regional Monitoring

- Mass Loading Stations/ Temporary Watershed Assessment Stations
  - The 1<sup>st</sup> wet sample was captured in November
  - The 1<sup>st</sup> dry sample was captured in January
  - There were some problems with getting samples in a few watersheds – Tecolote Creek due to a diversion upstream of the MLS; TJ has been dry; a strategy is needed to capture a sample in Mission Bay TWAS
- Source ID Monitoring Program 09-10
  - Two of three wet samples have been captured in Del Mar and Oceanside; the third will be captured today
- MS4 Outfall Monitoring Program
  - Targeted Wet – there has been a problem obtaining a sample. Per the workplan, there has to be two weeks of dry weather before a sample can be taken. With the way storms have been happening this wet season, there has not been a qualifying time when Weston can get a sample. May need to reopen workplan to address this issue.
  - Random Wet - 3 out of 6 random wet samples has been collected; only 2 in TJ; more samples will be taken today
- The 08-09 Regional Monitoring Report will be submitted to the Regional Board on 02/01/10.

## **MS4 OUTFALL MONITORING PROGRAM DATA COLLECTION**

Weston requested direction from the group as how to address the impact of the MS4 on the receiving waters. Information about receiving water conditions is needed and perhaps there needs to be additional questions on the Field Data Sheet for dry weather that help to address this issue. Potential questions could address if the outfall flow reaches the receiving water, as well as the flow rate of the receiving water. Since these samples are taken as a part of the targeted dry program and are usually done in conjunction with dry weather monitoring programs, the group will ask for input from the Dry Weather Monitoring Workgroup.

## **PYRETHROID DATA**

The group discussed the submittal of our pyrethroids data to the EPA to aid in their pesticides study. If any Copermittee has any questions, they should contact the County for more information.

## **REGIONAL MONITORING RFP**

A request for proposals is out for the regional monitoring and report writing contracts. The goal is to have a contracts in place by the end of this fiscal year.

## **LTEA/ DIAMOND RATING**

Weston is working on a draft document for revamping the LTEA and Diamond Rating System. The third and final workshop will meet in late February or March.

## **2010-2011 BUDGET**

Based on the Management Copermittee Workgroup, each workgroup is to decrease their budget by 2.5%. There will be further discussion of potential options to consider. This item will be tabled until the February meeting for voting.

## **DRY WEATHER MONITORING WORKGROUP**

The DWM Workgroup is scheduled to meet in February.

## **COASTAL MONITORING WORKGROUP**

The annual monitoring report has been completed and the Port will send a copy to the County.

## **BACTERIA TMDL**

The County gave a presentation to the Copermittees about issues with the Bacteria TMDL that is scheduled for adoption by our Regional Board on February 10<sup>th</sup>. Please see the attached presentation.

## **CEDEN.ORG DATA**

The Copermittees are requested to provide input about submitting our water quality data for the 2012 CA Integrated Report for Surface Water Quality Assessment and List of Impaired Waters. Data are not due until May 2010.

## **OC AND RIVERSIDE COUNTY MS4 PERMITS**

Weston provided the group with general summaries of the both the OC and Riverside Permits. The OC Permit was written by our Regional Board and may provide some insight as to how our future monitoring programs may be structured. Please see the attached presentations.

## **FUTURE MEETING**

The next Regional Monitoring Workgroup meets on **Tuesday, February 23, 2010** from 10:00am –12:00pm at the County of San Diego at 5201 Ruffin Road, Suite P, San Diego, CA 92123.

## AGENDA

### San Diego Regional Monitoring Workgroup (Updated)

County of San Diego, 5201 Ruffin Rd, Ste. P, San Diego, CA 92123

Tuesday, January 26, 2010

1:30 PM – 3:30 PM

1. Introductions
2. Approve meeting notes from December 15, 2010 meeting
3. Regional Monitoring Activities Update
  - a. Update Field Activities (Weston)
  - b. Annual Regional Monitoring Report- Completed- Will be submitted to SDRWQCB on Feb 1, 2010
  - c. Possible MS4s Data Sheet Revision – Recommend to assign this to the Dry Weather Workgroup
  - d. Provide pyrethroids data to EPA to aid in study (after Feb 1<sup>st</sup> so that all data will be public info- request Copermittees concurrence to proceed)
  - e. Two RFPs recently released: RFP for regional monitoring due on Feb 4<sup>th</sup>. RFP for regional reporting due on March 1<sup>st</sup>. The regional reporting contract is anticipated to be the primary contract vehicle for the LTEA and ROWD.
  - f. Anticipated schedule for draft “revamping the LTEA and Watershed Assessment Constituent Rating System “ draft report and Third Workshop (Weston)
4. Management Committee requires a 1.5% decrease of our proposed 2010-2011 Budget (County will send out several possible scenarios for your consideration and we will table this item until Feb. meeting—\*\*Voting item\*\*)
5. Dry Weather Monitoring Workgroup Update
6. Coastal Storm Drain Workgroup Update
7. TMDL or other Regulatory Issues Updates (Group)
  - a. Discussion of comments on Bacteria TMDL (due Jan 22<sup>nd</sup>) and possible RWQCB adoption on February 10 (County and All)
  - b. Request for water quality data for 2012 California Integrated Report- Surface Water Quality Assessment and List of Impaired Waters (County requests direction—Copermittee data submitted to CEDEN.org- this database is considered “readily available” data- Can be resubmitted if the workgroup requests it.Data are not due until May 2010)
8. Review of Monitoring Requirements of the Recently Adopted SDRWQCB Orange County Permit (Weston in place of County... Thank you to both Daves)
9. Review of Monitoring Requirements of the Draft Region 8 Santa Ana Riverside Permit (scheduled for adoption on Jan. 29<sup>th</sup>) (Weston)
10. Annual Revisit of Regional Monitoring Workgroup Priorities (delay to Feb/March meeting)
11. Other Items (please bring to meeting)
12. Future Meetings - The following meetings are at the County of San Diego, Location will be 5201 Ruffin Rd, Ste. P, San Diego, CA 92123 from 10 am to Noon:

Tuesday, February 23, Tuesday, March 23, Tuesday, April 27, Tuesday, May 25, Tuesday, June 29;

Note: Workshop #3 for Updating the Priority Rating System – Revamping the LTEA and Diamond Systems is to be scheduled for February or March

For updated meeting schedule, agendas and meeting summaries visit  
[www.projectcleanwater.org](http://www.projectcleanwater.org)

# Bacteria TMDL- County Comments

County of San Diego

## Key Comments

- (1) Opportunity for future TMDL Revisions
- (2) Compliance Monitoring not sole responsibility of MS4s
- (3) Rain event changed from 0.2 to 0.1 inch
- (4) No compliance with total coliform WQOs in fresh water



## Key Comments (cont'd)

- (5) Include allowable exceedance frequencies for dry weather
- (6) Extend TMDL Compliance Deadlines
- (7) TMDL should not require bacteria load reductions or monitoring in unimpaired watersheds



## (1) TMDL Reopener

- Proposal: Within 5 yrs of effective date or within 1 yr of final study results, whichever is later
- Purpose:
- Encourages additional study efforts if we know they will be considered- e.g. allowable natural exceedance freq. in creeks
- Allows revision of targets and implementation schedule as science evolves- e.g., updated EPA bacteria stds expected in 2012



## (2) Compliance Monitoring- Not MS4s Alone

- Require Agricultural, transportation and open space compliance monitoring



## (3) Rain Event Change from 0.2 to 0.1 inch

- Change: Wet weather days should equal rain event greater than 0.1 in or greater and the following 72 hrs
- Why?
  - Consistent with our Permit
  - Consistent with Leo Cabrillo Beach Reference Study where the 22% exceedance came from



#### (4) No WQOs for Total Coliform for Fresh Water

- Total Coliform WQO only applicable to marine waters not inland surface waters
- Remove WQO for Total Coliform for creeks and inland waterways



#### (5) Include Allowable Exceedance Frequencies for Dry Weather

- Leo Cabrillo Reference Study included a 3 % allowable winter dry-weather exceedance frequency
- Recent SCCWRP Studies Support dry weather WQO exceedances in reference streams



#### (6) Extend TMDL Compliance Deadlines

- Propose: Allow 20-yr compliance timeline for wet and dry weather
- Why?
- If CLRP- then may be able to extend wet to 20 yrs, but not dry
- Given the scale (over 1700 sq. mi), scope, complexity and cost of structural controls- need more time
- More than 1 watershed



#### (7) TMDL should not require bacteria load reductions or monitoring in unimpaired watersheds

- Page A1 says TMDLS developed for Pacific Ocean shorelines applies to all beaches in the HSAs, Has or Hus listed..(Table 3-1 in Tech Report)
- e.g., San Marcos HA (904.5) responsible for Moonlight Beach (1.43 sq mi drainage?)
- Misuse of resources when so many other impairments require attention

## Orange County 2009 MS4s Permit - Monitoring

County of San Diego

## Monitoring Programs

- (1) Mass Loading Stations – 2 wet and 2 dry weather events per year
- (2) Urban stream Bioassessment Monitoring including algae- twice per year
- (3) Ambient Coastal Receiving Water
- (4) Regional Bacteria Monitoring
- (5) MS4 Storm Water Outfall Monitoring

## Monitoring Programs (cont'd)

- (6) Source Identification Monitoring
- (7) Dry Weather Non-Stormwater
- (8) Special Studies
  - Aliso Creek bacteria study
  - SMC Regional Monitoring Program
  - Sediment Toxicity Study
  - Trash and Litter Impairment Study

## Programs Similar to Our Permit

- (1) Mass Loading Stations – 2 wet and 2 dry weather events per year
- (2) Urban stream Bioassessment Monitoring including algae- twice per year
- (6) Source Identification Monitoring: more vague than ours

## Other Programs (Not clear Equivalents)

(3) Ambient Coastal Receiving Water –  
Appears to be addressing ASBS-  
(Areas of Special Biological Significance)

(4) Regional Bacteria Monitoring –  
“collaborative regional bacteria monitoring”

Note: Need to review Technical report – may  
be AB411 and/or bacteria TMDL  
monitoring- to be further researched

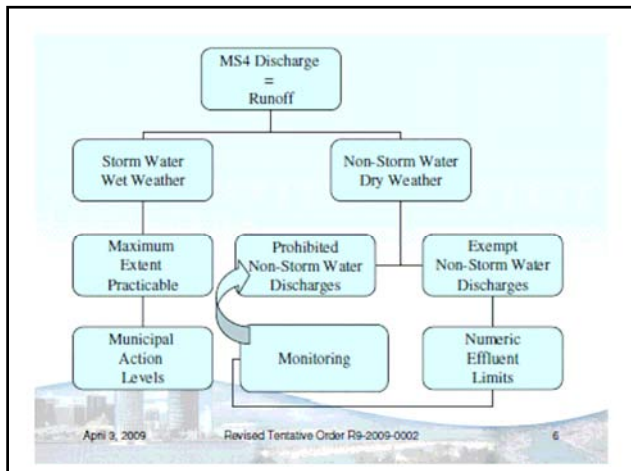
## “New/Updated” Programs

### (5) MS4 Storm Water Outfall Monitoring

- Only wet weather-
- SALs – stormwater action levels- will trigger detailed upstream investigations

### (7) Dry Weather Non-Stormwater Monitoring

- **Prohibition of over-irrigation**
- NELs – nonstormwater dry weather action levels- the NELs are based on WQOs and will trigger many upstream investigations



## Numeric Effluent Limitations

(Non-stormwater, Dry Weather)  
Discharges to Inland Surface Waters

a. Discharges to inland surface waters: Non-storm water discharges from the MS4 to inland surface waters shall not contain pollutants in excess of the following effluent limitations:

Table 4.a.1: General Constituents

Parameter	Units	AMEL	MDEL	Instantaneous Maximum	Basis
Fecal Coliform	MPN/100 ml	200 <sup>A</sup>	400 <sup>B</sup>		BPO
Enterococci	MPN/100 ml	33	-	104 <sup>C</sup>	BPO/OP
Turbidity	NTU	-	20		BPO
pH	Units	Within limit of 6.5 to 8.5 at all times			BPO
Dissolved Oxygen	mg/L	Not less than 5.0 in WARM waters and not less than 6.0 in COLD waters			BPO
Total Nitrogen	mg/L	-	1.0	See MDEL	BPO
Total Phosphorus	mg/L	-	0.1	See MDEL	BPO
Methylene Blue Active Substances	mg/L	-	0.5	See MDEL	BPO

A – Based on a minimum of not less than five samples for any 30-day period  
B – During any 30 day period  
C – This value has been set to Ocean Plan Criteria for Designated Beach Areas  
BPO – Basin Plan Objective  
MDEL – Maximum Daily Effluent Limitation  
AMEL – Average Monthly Effluent Limitation

## Numeric Effluent Limitations (Non-stormwater, Dry Weather) Discharges to Inland Surface Waters

Table 4.a.2: Priority Pollutants

Parameter	Units	Freshwater (CTR)		Saltwater (CTR)	
		AMEL	MDEL	AMEL	MDEL
Cadmium	ug/L	*	*	16	9
Copper	ug/L	-	-	5.9	2.9
Chromium III	ug/L	*	*	-	-
Chromium VI (hexavalent)	ug/L	16	8.1	83	41
Lead	ug/L	*	*	14	2.9
Nickel	ug/L	*	*	14	6.8
Silver	ug/L	*	*	2.2	1.1
Zinc	ug/L	-	-	95	47

CTR - California Toxic Rule  
\* - Effluent limitations developed on a case-by-case basis (see below)

- Metals based on CTR (Hardness based)

## Numeric Effluent Limitations (Non-stormwater, Dry Weather) Discharges to Bays, Harbors, and Lagoons/Estuaries

b. Discharges to bays, harbors and lagoons/estuaries: Non-storm water discharges from the MS4 to Dana Point Harbor and to saline lagoons/estuaries shall not contain pollutants in excess of the following effluent limitations:

Table 4.b: General Constituents

Parameter	Units	AMEL	MDEL	Instantaneous Maximum	Basis
Total Coliform	MPN/100 ml	1,000	-	10,000	BPO
Fecal Coliform	MPN/100 ml	200 <sup>A</sup> , 400 <sup>B</sup>	-	-	BPO
Enterococci	MPN/100 ml	35	-	104 <sup>C</sup>	BPO
Turbidity	NTU	75	-	225	OP
pH	Units	Within limit of 6.0 to 9.0 at all times			OP
Priority Pollutants	ug/L	See limitations in Table 4.a.2			

A - Based on a minimum of not less than five samples for any 30-day period  
B - During any 30-day period  
C - Designated Beach Areas  
OP - California Ocean Plan 2005  
MDEL - Maximum Daily Effluent Limitation  
BPO - Basin Plan Objective  
AMEL - Average Monthly Effluent Limitation

- Metals based on CTR (Hardness based)

## Numeric Effluent Limitations (Non-stormwater, Dry Weather) Discharges to The Surf Zone

c. Discharges to the surf zone: Non-storm water discharges from the MS4 to the surf zone shall not contain pollutants in excess of the following effluent limitations:

Table 4.c: General Constituents

Parameter	Units	AMEL	MDEL	Instantaneous Maximum	Basis
Total Coliform	MPN/100 ml	1,000	-	10,000 <sup>A</sup>	OP
Fecal Coliform	MPN/100 ml	200 <sup>B</sup>	-	400	OP
Enterococci	MPN/100 ml	35	-	104 <sup>C</sup>	OP

A - Total coliform density shall not exceed 1,000 per 100 ml when the ratio of fecal/total coliform exceeds 0.1  
B - During any 30 day period  
C - Designated Beach Areas  
OP - California Ocean Plan 2005

## 4. Wet Weather Municipal Action Levels

- Average of 20% or greater exceedance
- Compliance with MEP
- Measurable performance criteria





## Stormwater Action Levels for Wet Weather Section D of the Order

- Beginning Year 3 after Order adoption date, a running average of twenty percent or greater of exceedances of any discharge of storm water from the MS4 to waters of the United States that exceed the Storm Water Action Levels (SALs) for the pollutants listed in Table 5 (below) will require each Copermittee to affirmatively augment and implement all necessary storm water controls and measures to reduce the discharge of the associated class of pollutant(s) to the MEP standard.

Table 5. Storm Water Action Levels

Pollutant	Action Level
Turbidity (NTU)	126
Nitrate & Nitrite total (mg/L)	2.9
P total (mg/L)	1.46
Cd total (µg/L)	3.0
Cu total (µg/L)	127
Pb total (µg/L)	250
Ni total (µg/L)	54
Zn total (µg/L)	976

## Stormwater Action Levels for Wet Weather Section D of the Order

- The end-of-pipe assessment points for the determination of SAL compliance are all major outfalls, as defined in 40 CFR 122.26(b)(5) and (b)(6). The Copermittees **must develop their monitoring plans to sample a representative percent of the outfalls within each hydrologic subarea**. At a minimum, outfalls that exceed SALs must be monitored in the subsequent year. **Any station that does not exceed an SAL for 3 years may be replaced with a different station. SAL samples must be 24 hour time weighted composites.**
- 40 CFR 122.26
  - (5) *Major municipal separate storm sewer outfall* (or "major outfall") means a municipal separate storm sewer outfall that discharges from a single pipe with an inside diameter of **36 inches or more** or its equivalent (discharge from a single conveyance other than circular pipe which is associated with a **drainage area of more than 50 acres**); or for municipal separate storm sewers that receive storm water from **lands zoned for industrial activity** (based on comprehensive zoning plans or the equivalent), an outfall that discharges from a single pipe with an **inside diameter of 12 inches or more or from its equivalent** (discharge from other than a circular pipe associated with a **drainage area of 2 acres or more**).

### 1. ~~Urban Runoff~~

- "Urban runoff" is not in federal regulations
- Clarifies that the permit regulates MS4 discharges regardless of source.

### 3. Over Irrigation

- Over irrigation identified as a pollutant source and conveyance; therefore
- Over irrigation discharges are prohibited



### 3. Over Irrigation

- Water conservation
- Does not stop lawn watering



April 9, 2009

Revised Tentative Order R9-2009-0002

10

### Non-Storm-water Dry Weather Monitoring

- Stations include major outfalls discharging to inland surface waters, bays, harbors, lagoon/estuaries and to the surf zone (submit plan)
- Collect grab if ponded and one-hour composite if flowing
- Analyze for Table 1 (MLS analytes), chloride, sulfate, TDS and other constituents with action levels in Section C (mainly metals, bacteria, nutrients & MBAS)--\$\$\$

### Non-Storm-water Dry Weather Monitoring cont'd

- Stringent Follow-up Investigation Required if NALs exceeded – because NALs are based on WQOs- there will be many, many investigations and many results are required in 14 days to RWQCB, which will require expedited lab analyses.
- Consider this in your future budgeting!
- A process is given to exempt natural sources

## Overview of the Riverside County MS4 NPDES Permit (Order R8-2010-0033)

Presentation to the San Diego Copermitee Monitoring  
Workgroup  
01/26/2010

David S. Renfrew, CPSWQ



## Updates

- Renews Order No. R8-2002-0011
- RCFC&WCD continues as Lead Copermitee
- Requires revision to the DAMP
- Requires each Permittee to develop a Local Implementation Plan
- Identified **major outfalls** as those  $\geq 36"$  or those draining  $\geq 50$  acres.
- Submitted ROWD in January 2007
  - Included a Drainage Area Master Plan (specifying BMPs and policies for
    - Existing facilities
    - New development and significant redevelopment
- Includes provisions for diversion of funds to Regional Monitoring efforts...when approved by EO.

## ROWD Provides Info on Strategy

- TMDL focus on Nutrients and Bacteria
- Long Term Strategy
  - Due to the inherent variability of Urban Runoff, years of monitoring data collection are necessary to identify statistically significant trends or draw conclusions on program effectiveness.
  - Plan is to continue long term trends
- Short Term Strategy
  - Focuses on quantitative, indirect methods of assessment.
  - collect various metrics defined in the DAMP annually to assist with program evaluation.
  - Following review of DAMP metrics, determine if any course corrections on existing program elements may be beneficial.

## Interesting intro

- Order regulates the discharge of Pollutants in Urban Runoff from **anthropogenic** sources.
- Acknowledges the Permittees lack legal jurisdiction over discharges into their MS4 facilities from:
  - agricultural activities
  - State and federal facilities
  - public schools and hospitals
  - Utilities
  - Railroads and special districts
  - Native American tribal lands
  - wastewater management agencies and
  - other point and non-point source discharges otherwise permitted by the Regional Board.

## MEP notes

- Certain activities and sources that generate Pollutants present in Urban Runoff may be beyond the ability of Permittees to prevent or eliminate.
  - emissions from internal combustion engines
  - brake pad wear and tear
  - atmospheric deposition
  - bacteria and wildlife (including feral cats and dogs) and
  - leaching of naturally occurring nutrients and minerals from local soils.
- This Order is not intended to address background or naturally occurring Pollutants or flows.

## Issues Identified

- Yes...Nurdles
- WQO exceedances for various Urban Runoff-related Pollutants (**fecal coliform bacteria, nutrients, total suspended solids, turbidity, metals, etc.**) at various watershed monitoring stations.
- Requirements for control of dry weather flows from Permittee activities that may cause an exceedance of Receiving Water WQO for TDS or total inorganic nitrogen (TIN)
  - TIN = nitrate as n, nitrite as n, and ammonia as n
- **Storm water was considered to be an insignificant source for nitrogen/TDS in groundwater.**

- The Permittees have identified nutrients and bacteria as priority constituents for initial corrective actions.

## TMDL Approaches

- Participation with multiple agencies to address the elevated fecal bacterial indicator levels:
  - Storm Water Monitoring Coalition (SMC)
  - Storm Water Quality Standards Task Force
  - The Lake Elsinore and Canyon Lake TMDL Task Force
  - The Middle Santa Ana River TMDL Task Force
  - and Southern California Coastal Water Research Project (SCCWRP)
- Also, the Permittees are anticipating that the use of fecal bacterial indicator will be changed to E. coli and the reclassification of REC uses for several MS4 facilities in the near future. However, E. coli data still indicates Basin Plan Objective exceedances that will need to be addressed as part of the TMDL.

## UAAs for REC Beneficial Uses

- The work of the Storm Water Quality Standards Task Force **is likely to result in changes to Recreational Water Quality Objectives and implementation measures, including the suspension of recreational standards during high flow events.**
- Further, some MS4 facilities may be recategorized as REC 2 or REC X (REC 1 nor REC2) pursuant to Use Attainability analyses (UAAs).
- These changes will likely allow the Permittees to **focus their TMDL compliance resources on bacterial contamination that is affecting recreational swimming areas used during the dry season as the highest priority.**

## Other requirements

- Review CC&R for O&M of post-construction BMPs
- Watershed Action Plan
- Hydromodification requirements
- LID issues
  - The Lake Elsinore issue
    - Concentration of pollutants due to evapotranspiration
    - requiring infiltration of Urban Runoff from projects is counterproductive to the overall watershed goals

## WQBELs and WLAs

- **The Permit includes a procedure for determining whether Urban Runoff is causing or contributing to exceedances of Receiving Water Limitations** and for evaluating whether DAMP must be revised to meet Water Quality Standards.
- The Order establishes an iterative process to determine compliance with the Receiving Water Limitations.
- TMDL WLAs described in detail throughout.

## Monitoring and Reporting Requirements

- An effective monitoring program:
  - characterizes Urban Runoff
  - identifies problem areas
  - determines the impact of Urban Runoff on receiving waters and;
  - the effectiveness of BMPs.
- Principal Copermitttee implements CMP

## Monitoring Requirements

1. Implement Middle Santa Ana River Watershed Bacteria Indicator TMDL Monitoring
2. Lake Elsinore/Canyon Lake Nutrient TMDL Monitoring

## E.1 Core Monitoring Requirements

- a. An estimate of flow in cubic feet per second (cfs) from the outfall/stream at the time of sampling.
- b. Monitor mass emissions in urban storm water runoff to:
  - i. Estimate the total mass emissions from the MS4s to receiving waters.
  - ii. Assess trends in mass emissions associated with specific urban storm water discharges from their MS4s over time.

- iii. Determine if urban storm water runoff is contributing to exceedances of water quality objectives or beneficial uses in receiving waters by comparing outfall and receiving water results to:

- (1) Basin Plan Water quality Objectives (WQOs);
- (2) California Toxic Rule (CTR)
- (3) USEPA Multi-Sector Permit Parameter Benchmark Values and
- (4) other MS4 discharger's monitoring data or other appropriate data identified by the Permittees.

The Permittees should also evaluate the Regional Monitoring reports prepared by SCCWRP to assess trends in urban runoff and receiving water quality within the Permit Area.

## Monitoring Frequency

- Representative samples from the first sampleable storm event (Oct 1-April 30)
  - 3 Storms total per year
  - 2 dry weather events per year
- The analyte list will be reviewed annually.
  - Constituents may be added if expected to be present
  - Analytes be removed from the list if three consecutive NDs.

## Other requirements

- Toxicity and TIE requirements
  - C. Dubia
  - Fathead minnow
  - *Selenastrum capricornutum*
  - Can also be met with SMC participation
- IC/ID requirements
  - Uses dry and wet weather reconnaissance strategies
  - Recommends Guidance Manual for Illicit Discharge, Detection, and Elimination developed by the Center for Watershed Protection
  - Emphasizes focus in high priority areas (metals and sediments) and to determine areas for intensive monitoring efforts.

- Bioassessment requirements met through SMC Program
- QAPP Required-SWAMP Compatible
- A procedure for the collection, analysis, and interpretation of existing data from local, regional or national monitoring programs.
- Hydromodification Monitoring
- LID BMP Monitoring

## LID BMP Monitoring

The Principal Permittee shall continue to participate in data collection and monitoring to assess the effectiveness of low impact development techniques in semi-arid climate as part of the SMC project titled, "Quantifying the Effectiveness of Site Design/ Low Impact Development Best Management Practices in Southern California".

The Principal Permittee is also developing a regional LID BMP testing and demonstration facility at the main office that meets the intent of this requirement (currently the facility data is intended to be integrated into the SMC project).

## Program Effectiveness Assessment and Reporting

- Emphasis on focusing on 303(d) listed waters
- Prescriptive requirements for reporting and schedule
- Example:
  - Prepare a triennial report summarizing the data collected for the preceding 3 year period and evaluating compliance with the WLAs.
  - The first report shall be due February 15, 2010.

## Links

### Riverside Permit

– [http://www.waterboards.ca.gov/santaana/water\\_issues/programs/stormwater/riverside\\_permit.shtml](http://www.waterboards.ca.gov/santaana/water_issues/programs/stormwater/riverside_permit.shtml)

### Salinity Info

<http://www.socalsalinity.org/>

