



Understanding TMDL Impacts on Industrial Facilities with the California Water Board

Presented by





MODERATOR

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INDUSTRIAL STORMWATER IS

ALL WE DO.....





GUEST

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AGENDA

- ✓ TMDL process
- ✓ TMDL timeline
- ✓ Potential Impacts
- ✓ Your questions

Industrial General Permit Amendment to Implement Total Maximum Daily Loads

Shuka Rastegarpour

State Water Resources Control Board

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PRESENTATION TOPICS

1. Introduction: Total Maximum Daily Loads

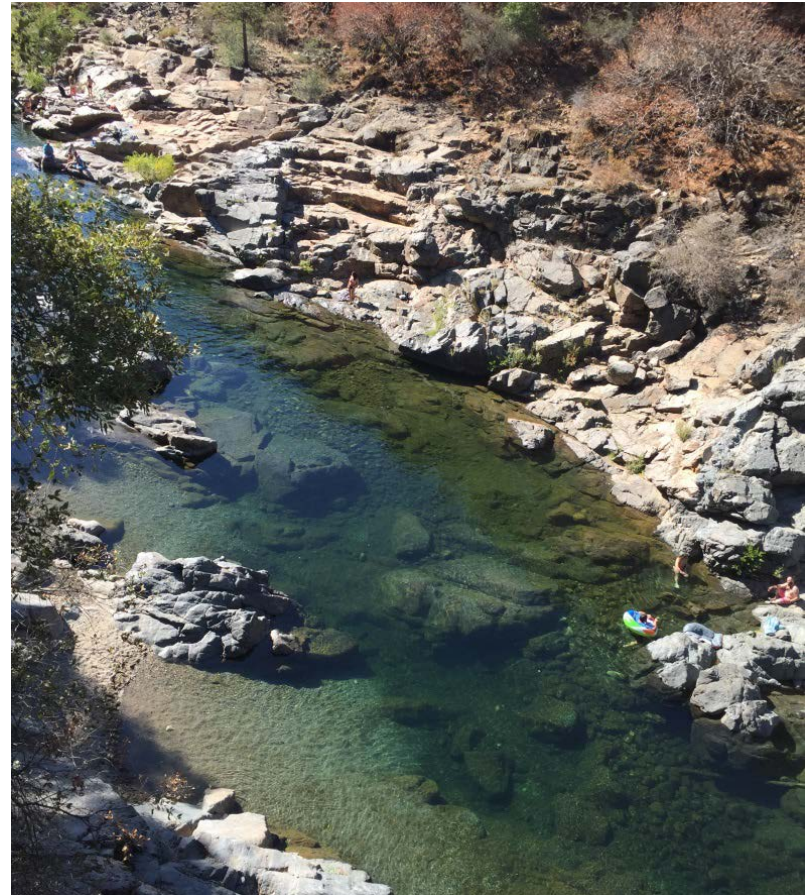
2. Public Process

3. Translating TMDL Language

4. Schedule

WHAT IS A TOTAL MAXIMUM DAILY LOAD?

- A Total Maximum Daily Load (TMDL) relates to the maximum amount of a pollutant that a water body can receive and still attain water quality standards. (40 C.F.R. § 130.2(i).
 - Addresses the impaired waterbody
 - Adopted into a Basin Plan
 - Waste Load Allocation (WLA) or Load Allocation (LA) is assigned for each source of discharge
 - Mechanism for implementation: orders, permits, etc.



DO TMDLS APPLY TO INDUSTRIAL GENERAL PERMIT (IGP) PERMITTEES?

- **YES**, Dischargers with a National Pollutant Discharge Elimination System (NPDES) permit must comply with effluent limitations that are “consistent with the assumptions and requirements of any available waste load allocation for the discharge prepared by the state and approved by U.S. EPA pursuant to 40 Code of Federal Regulations section 130.7”.
- **YES**, Water Code section 13263, subdivision (a), requires that Waste Discharge Requirements (WDR) implement any relevant water quality control plans.
 - TMDL is incorporated into a Basin Plan as an amendment
 - Basin Plan is not self-implementing

CHECKLIST: IGP TMDL PROCESS

- ✓ Watersheds with U.S. EPA and Regional Water Board approved TMDLs have been included in Attachment E.
- ✓ The State Water Board commenced collaboration with Regional Water Boards to develop TMDL-specific permit requirements/limits.

ATTACHMENT E

LIST OF TOTAL MAXIMUM DAILY LOADS (TMDLS) APPLICABLE TO INDUSTRIAL STORM WATER DISCHARGERS

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMIT FOR STORM WATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITIES (GENERAL PERMIT)

The following table contains a list of Regional Water Board adopted and/or U.S. EPA established/approved TMDLs, as of the adoption date of this General Permit, that are applicable to industrial storm water Dischargers. TMDLs adopted/established after the effective date of the General Permit may, at the Water Boards discretion, be included in this General Permit. This General Permit may be reopened to amend TMDL-specific permit requirements in this Attachment E, or to incorporate new TMDLs adopted during the term of this General Permit that include requirements applicable to Dischargers covered by this General Permit.

Water Body	Pollutant
San Francisco Bay Regional Water Quality Control Board	
Napa River	Sediment
Sonoma Creek	Sediment
Los Angeles Regional Water Quality Control Board	
Santa Clara River Reach 3	Chloride
Santa Clara River	Nutrients
Los Angeles River	Metals
Los Angeles River	Nutrients
San Gabriel River	Metals and Selenium
Santa Monica Bay	Nearshore Debris
Machado Lake	Nutrient
Harbor Beaches of Ventura	Bacteria
Ballona Creek	Metals
Ballona Creek Estuary	Toxic Pollutants
Los Angeles Harbor	Bacteria
Marina del Rey Back Basins	Bacteria
Santa Clara River	Bacteria
Walker Creek,	Mercury
Oxnard Drain No. 3	Pesticides, PCBs ¹ and Sediment Toxicity
Long Beach City Beaches and Los Angeles River Estuary	Indicator Bacteria
Los Angeles and Long Beach Harbors	Toxic and Metals

¹ Polychlorinated biphenyls

CHECKLIST: IGP TMDL PROCESS

- ✓ The Regional Water Board staff developed proposed TMDL-specific permit requirements for each of the TMDLs listed in Attachment E.
 - Finding #40 of the IGP

- ✓ TMDL-specific permit requirements were publicly released in March 2016.
 - After conducting a 30-day public comment period, the Regional Water Boards submitted the proposed TMDL-specific permit requirements to the State Water Board.

CHECKLIST: TO DO

- ❑ The State Water Board will issue a public notice and conduct a public comment period for the reopening of the IGP to amend Attachment E, the Fact Sheet, and other provisions as necessary for incorporation of TMDL-specific permit requirements.



DEVELOPING TMDL LANGUAGE

- Resources:
 - Adopted TMDL
 - Staff Report/ Technical document
 - Resolution
 - Regional Water Board Draft TMDL-specific language
 - Comments received



TMDL LANGUAGE DEVELOPMENT CONSIDERATIONS

Is industrial storm
water a source?

Is it significant?

Was a Waste Load
Allocation identified?

What requirements
and schedule were
provided?

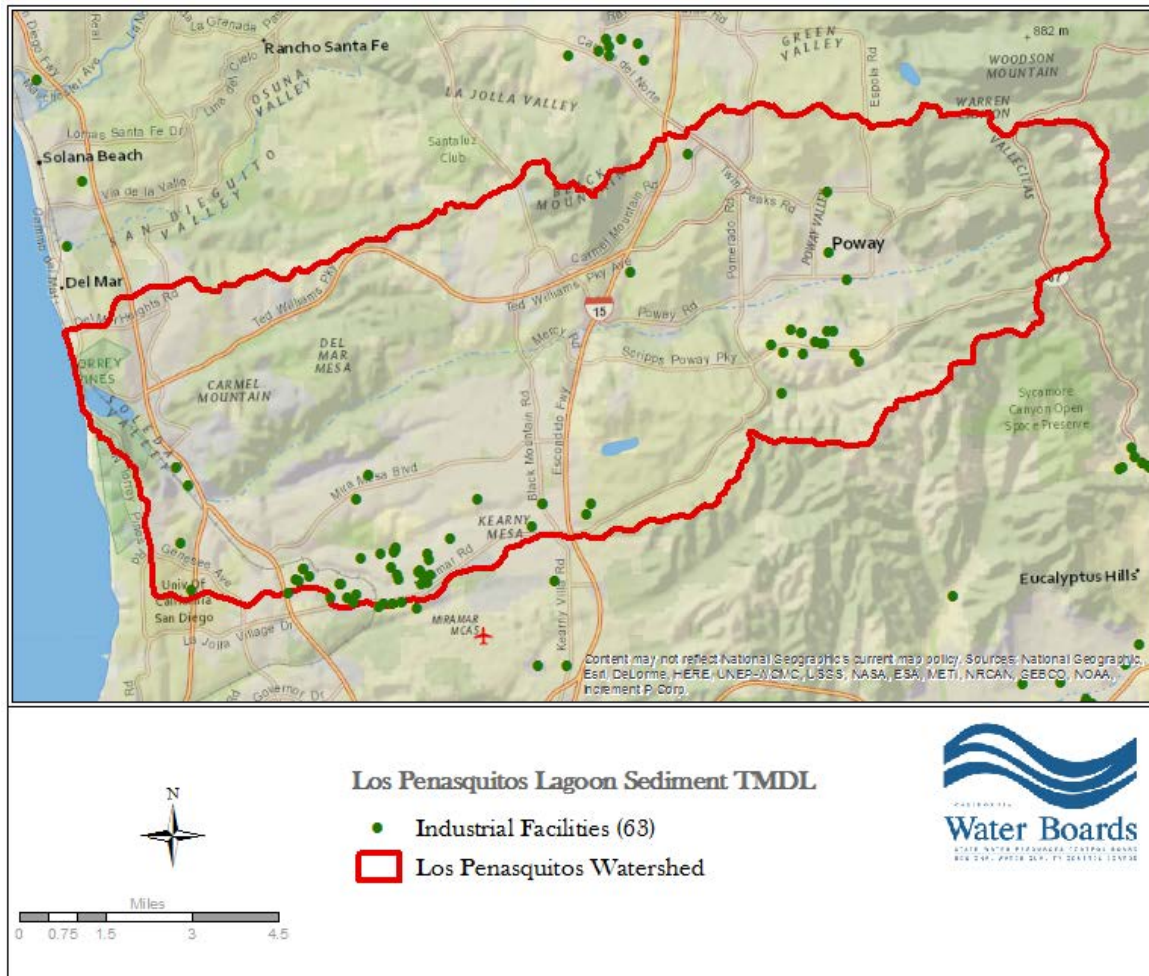
Industrial General
Permit compliance =
TMDL compliance?

TRANSLATION OF TMDL

1. Waste Load Allocation Translation:
 - The General Permit currently contains Numeric Action Levels (NALs)
 - Waste Load Allocation translation:
 - A. Current IGP NALs
 - B. TMDL NALs (TALs)
 - C. Numeric Effluent Limits (NELs)

2. Monitoring/Reporting Requirements
 - Aiming to keep it in line with current General Permit
 - Any additional requirements will be due to TMDL specific requirements

APPLICABILITY: EXAMPLE COMPLIANCE WATERSHED



COMPLIANCE DEADLINES

- IGP amendment's adoption date is the same as the effective date (implementation is upon adoption).
 - Dischargers required to comply with new IGP requirements for TMDLs upon IGP amendment adoption/effective date.
- Compliance Deadline Possibilities:
 1. No Compliance Deadline given
 2. Compliance deadline given, but past due date
 3. Compliance deadline given, and it's in the future
- Compliance Deadline is essential in a TMDL-Implementation language for NEL compliance

IGP TMDL SCHEDULE

Fall 2016: External focused stakeholder outreach



Summer 2017: Finalize draft TMDL-specific language



Fall 2017: Public comment period, workshops, and hearing

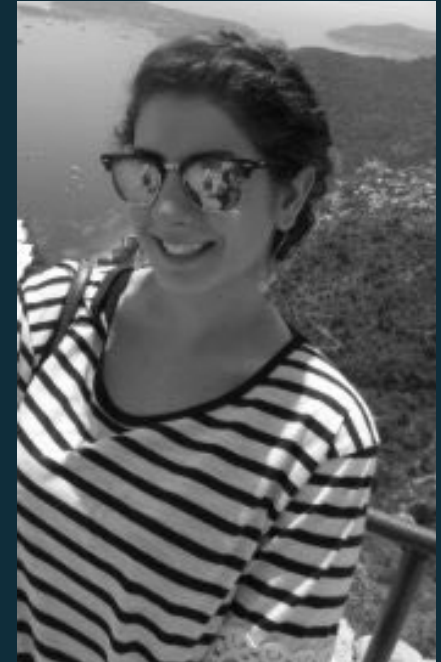


2018: Adoption meeting



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QUESTIONS



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