

# California Stormwater Quality Association

## Recommendations on Using the Findings of the Blue Ribbon Panel Report



**July 21, 2006**

# CASQA Observations & General Comments

- ◆ Applause
- ◆ Report content (observations / recommendations)
  - ◆ Not surprising; as expected
  - ◆ Demonstrates the difficulty of the stormwater “question”
  - ◆ Recommendations can definitely be used
  - ◆ Use the full recommendation
- ◆ CASQA comments
  - ◆ There are some areas that we would like clarification on – will submit written comments
  - ◆ Focus on how State Water Board can use the report recommendations

# Blue Ribbon Panel Report – Permit Type

## Recommendation

List recommendation

*CASQA Position statement*

## Near-term Action

List approach  
and/or activity

## Research, Data

## Collection and Policy

List approach and/or  
activity

# California Stormwater Quality Association

## Blue Ribbon Panel Report – Industrial Recommendations



July 21, 2006

# Blue Ribbon Panel Report - Industrial

## Recommendation

Current Industrial storm water database is inadequate to establish numeric limits. State Water Board needs to re-examine & collect new data before establishing numeric limits

*CASQA Concurs the existing database is not suitable for establishing numeric limits*

## Near-term Action

Institute a Collaborative Effort on a process to establish TBELs, WQBELs or TMDLs

Initial Needs:

- Statewide inventory of industrial activities/BMPs.
- Accurate catalog of industries and water quality issues

## Research, Data Collection and Policy

Implement a Research Program:

- To obtain scientifically based monitoring data (consistent w/ USEPA methodology) to support numeric limits development
- Ensure monitoring and data is cost-effectively collected

# Blue Ribbon Panel Report - Industrial

## Recommendation

Where sufficient data is available, establish  
Action Levels

*CASQA Concurs with this Recommendation*

### Near-term Action

- Develop ALs based on the current database
- Incorporate ALs as triggers for BMP review, not as numeric limits

### Research, Data Collection and Policy

- Develop scientific data needs to refine ALs
- Develop cost-effective monitoring & data collection to assess BMP performance relative to ALs
- Develop tiered BMP response to ALs exceedances

# Additional Policy and Implementation Issues

***CASQA commits to work with the State Water Board to develop the following:***

- ***Design Storm Criteria for Industrial Sector***  
*(Design storm criteria are necessary for BMP design and for when a facility is no longer able to contain, treat or manage excess storm water)*
- ***Guidance on how ALs or BMs are to be Implemented.***
  - *How, where, when should samples be taken?*
  - *Need guidance on nature and extent of BMP review*



# California Stormwater Quality Association

## Blue Ribbon Panel Report – Construction Recommendations



**July 21, 2006**



# Blue Ribbon Panel Report - Construction

## Recommendation

Action Levels (AL) for erosion & sediment control BMPs are more commonly feasible

*CASQA concurs with this recommendation*

### Near-Term Action

- Develop collaborative data gathering strategy to develop AL and establish background turbidity (during rain events)
- Develop tiered response to AL exceedances

### Research, Data Collection, & Policy

- Conduct a cost effective monitoring program to support AL development and subsequent effluent monitoring program
- Establish AL based on statistical evaluation

# Blue Ribbon Panel Report - Construction

## Recommendation

Numeric Effluent Limits are feasible for advance treatment systems (ATS) at some sites with reservations

*CASQA concurs with reservations noted by the BRP on the establishment of effluent limits for ATS*

## Near-Term Action

- Develop collaborative data gathering strategy to develop TBELs for ATS
- Establish inventory of ATS and site conditions

## Research, Data Collection, & Policy

- Conduct scientifically based monitoring program (consistent with USEPA methodology) to support TBELs
- Establish conditions for application of ATS
- Evaluate impact of ATS discharges

# Additional BRP recommendations

- **Provide incentives for dry season construction and winter stabilization**

*CASQA recommends the State Water Board consider wet v. dry season AL, reduce SWPPP and monitoring requirements for dry season construction, and implement USEPA "R" factor waiver*

- **AL should be considered for pollutants other than turbidity and TSS**

*CASQA recommends the State Water Board alternately consider an AL for pH based on Basin Plans and enhance the rigor of non-stormwater BMPs*

- **Establish relief from permit conditions for storms of unusual size**

*CASQA recommends the State Water Board establish design storm based standard engineering formula in next permit term*

# California Stormwater Quality Association

## Blue Ribbon Panel Report – Municipal Recommendations



July 21, 2006

# Blue Ribbon Panel Report - Municipal

## Recommendation

Numeric effluent criteria for municipal BMPs and urban discharges are not feasible

- Numeric effluent limits for catchments without treatment controls are not possible
- For catchments without treatment controls Action Levels (ALs) may be used as interim approach

*CASQA Concurrs with these Recommendations*

## Near-term Action

- Use ALs as trigger for follow up action - not as compliance limits
- Develop dry weather ALs
- Use iterative approach

## Research, Data Collection and Policy

- Identify approach to establish ALs for wet weather
- Establish protocols for wet weather AL data collection

# Blue Ribbon Panel Report - Municipal

## Recommendation

Review/Revise Treatment BMP Selection, Design and Maintenance Requirements and Protocols

- Select, design and maintain treatment BMPs more rigorously
- Presume performance standard is met if designed and maintained appropriately

*CASQA Concurs with these Recommendations*

## Near-term Action

- Require more rigorous BMP selection process (CASQA BMP Handbook)
- Require submittal of detailed maintenance plans
- Require verification

## Research, Data Collection and Policy

- Establish protocols for data collection & consistency
- Collect data to establish treatment BMP performance standards

## **Additional Policy and Implementation Issues**

***CASQA commits to work with the State Water Board to:***

- ***Revise CASQA New Development BMP Handbook as a State approved design manual***
  - Develop treatment control BMP design criteria and maintenance criteria***
- ***Research and develop California based LID projects***
- ***Identify critical stressors relative to receiving water protection***