Presentation to SWRCB
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What is required to set numeric limits for storm flows?

- Current data are inadequate for establishing numeric limits
- Different types of numeric limits are possible
- Data needs will depend upon:
  - Type of limit to be developed
  - Methodology to be used to establish numeric limits
  - Monitoring and compliance strategies

Options for storm water regulation

Continue to implement and improve **iterative BMP approach**

BMPs with "action levels" (ALs)

Technology-based effluent limits (TBELs)

Water Quality-based effluent limits (WQBELs)

Data needs

Time required

Level of difficulty

Option 1: Iterative BMP process

- Evaluate and select appropriate BMPs
- Compliance and enforcement based on BMP implementation and maintenance
- Examples of data needed:
  - BMP unit design and efficiency
  - Design criteria ("design storm")
  - Gross receiving water quality
  - Monitoring design
  - Maintenance and enforcement options

Option 2: BMPs with Action Levels

- ALs to identify "bad actors" and trigger iterative approach
- Examples of additional data needed:
  - Process and procedures for setting ALs
  - Actions required when ALs are exceeded
  - Data on constituent concentrations
- SWRCB database *may* be sufficient for ALs for some constituents

Option 3: TBELs

- Implementation would consider:
  - Volume/flow to be treated (design conditions)
  - Efficiency of treatment
  - Influent water quality
- Examples of additional data needed:
  - Detailed influent water quality characterization
  - BMP and treatment performance data
  - Process for setting TBELs (to consider variability of storm flows)
  - Monitoring and compliance options

Option 4: WQBELs

- Must consider variability (dynamic modeling or statistical approaches)
- Examples of additional data needed:
  - Detailed effluent quality and flow data
  - Detailed receiving water quality and flow data
  - Means of compliance
  - Methodology for RPA and calculating limits
  - Development of monitoring strategies and enforcement options
- TMDL considerations

Additional considerations

- Data needs must consider
  - Type of limit
  - Methods for setting limits
  - Monitoring and compliance strategies
- Different types of limits will have different compliance strategies, implications, timelines
- Gary Lorden will provide additional detail on statistical/design considerations