

1

Informal Draft

Small Municipal Stormwater Permit

September 2024 Workshops

State Water Resources Control Board
Division of Water Quality, Municipal Stormwater Unit

Virtual/Remote Workshop

Tuesday, September 3, 2024 – 1:00 - 4:00 p.m.

In-Person Workshop

Thursday, September 5, 2024 – 9:00 a.m. - 12:00 p.m.



Staff Workshop Informal Draft Small MS4 Permit

Virtual/Remote: 9/3/2024

In-Person: 9/5/2024

Paul Levy, Environmental Scientist





Paul Levy



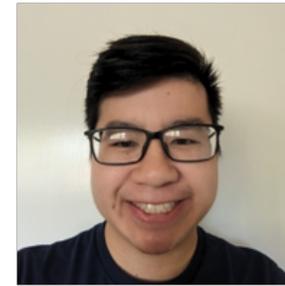
Leo Cosentini



Flora Luo



Sheena Dhillon



Nicholas Wong

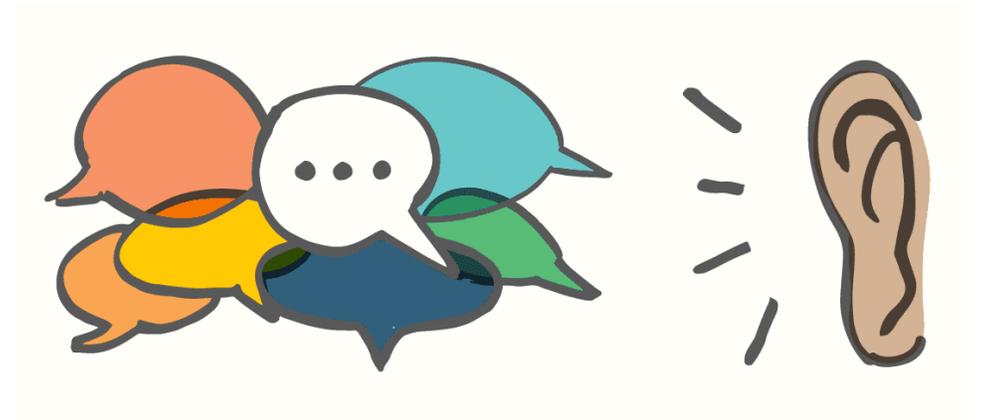


Mary Boyd

Municipal Stormwater Permitting Team

Welcome

- This is an informal discussion.
- No written responses and no formal action will be taken.
- Staff welcomes all questions on presented information.
- Questions will be answered as time allows.
- There will be a break after the presentation.
- Consider signing up for our email subscription list for updates.



Technical Assistance

For technical assistance for viewing the workshop:

- Email:

SmallMS4Workshop@waterboards.ca.gov

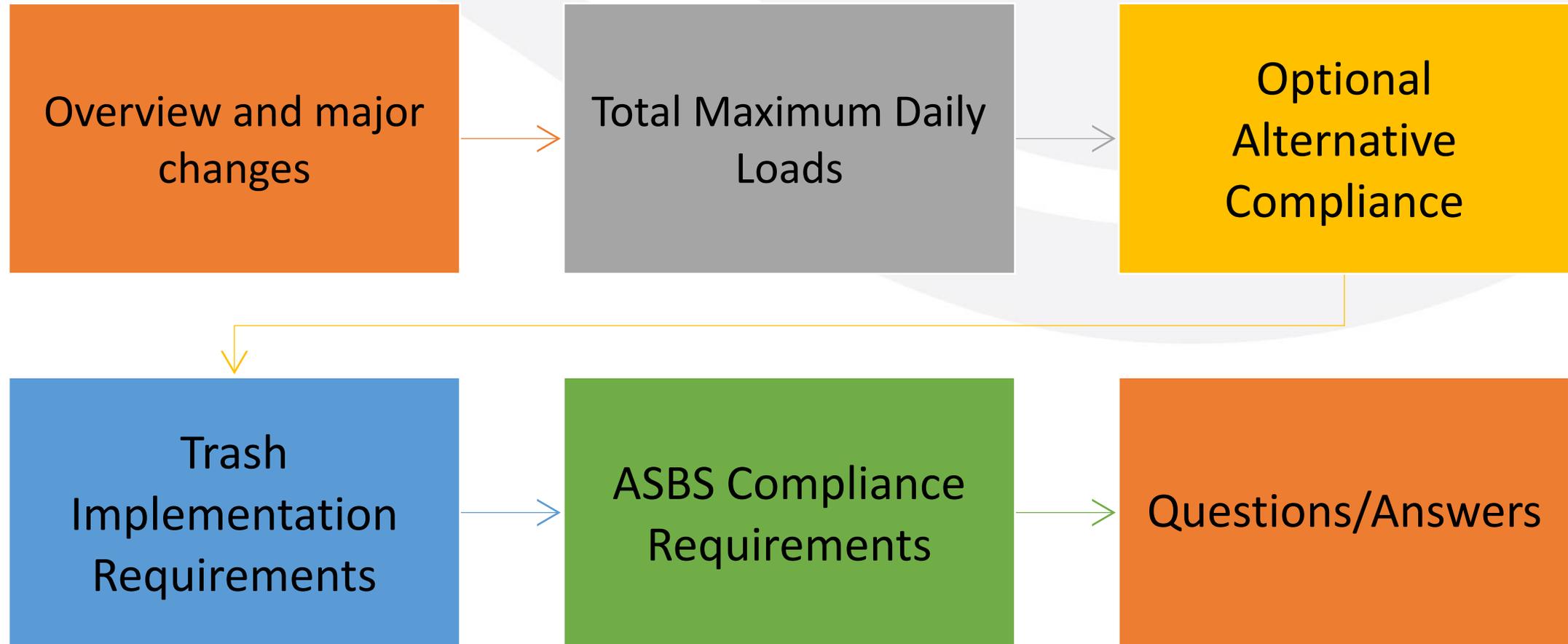
- Subject line: Technical Assistance.
- Describe the viewing issue.

How to Submit Questions

- Email Questions to:
SmallMS4Workshop@waterboards.ca.gov
- Subject line: The **category**, such as trash, ASBS, BMPs, alternative compliance, post-construction, etc.
- Provide the following information:
 - Your **name**;
 - Your **organization's name**; and
 - Your **questions**.



Workshop Agenda



Permit History



Reorganization

2013 Permit

- Order
- Fact Sheet
- Attachment A - Traditional Small MS4 List
- Attachment B - Non-Traditional Small MS4 List
- Attachment C - Special Conditions for ASBS Discharges
- Attachment D - ASBS dischargers List
- Attachment E - Education and Outreach Requirements
- Attachment F - Standard Provisions
- Attachment G - TMDLs
- Attachment H - Acronyms & Abbreviations
- Attachment I - Glossary

Informal Draft

- Order
- Attachment A – Regulated Small MS4s
- Attachment B – Fact Sheet
- Attachment C – NOI and Waiver Requirements
- Attachment D – Provisions for Traditional Permittees
- Attachment E – Provisions for Non-Traditional Permittees
- Attachment F – ASBS Requirements
- Attachment G – TMDL Implementation Requirements
- Attachment H – Trash Implementation Requirements
- Attachment I – Alternative Compliance Capture Option
- Attachment J – Acronyms, Abbreviations, and Glossary

Reorganization

2013 Permit

- Order
- Fact Sheet
- Attachment A - Traditional Small MS4 List
- Attachment B - Non-Traditional Small MS4 List
- Attachment C - Special Conditions for ASBS Discharges
- Attachment D - ASBS dischargers List
- Attachment E - Education and Outreach Requirements
- Attachment F - Standard Provisions
- Attachment G - TMDLs
- Attachment H - Acronyms & Abbreviations
- Attachment I - Glossary

Informal Draft

- Order
- Attachment A – Regulated Small MS4s
- Attachment B – Fact Sheet
- Attachment C – NOI and Waiver Requirements
- Attachment D – Provisions for Traditional Permittees
- Attachment E – Provisions for Non-Traditional Permittees
- Attachment F – ASBS Requirements
- Attachment G – TMDL Implementation Requirements
- Attachment H – Trash Implementation Requirements
- Attachment I – Alternative Compliance Capture Option
- Attachment J – Acronyms, Abbreviations, and Glossary

Reorganization

2013 Permit

- Order
- Fact Sheet
- Attachment A - Traditional Small MS4 List
- Attachment B - Non-Traditional Small MS4 List
- Attachment C - Special Conditions for ASBS Discharges
- Attachment D - ASBS dischargers List
- Attachment E - Education and Outreach Requirements
- Attachment F - Standard Provisions
- Attachment G - TMDLs
- Attachment H - Acronyms & Abbreviations
- Attachment I - Glossary

Informal Draft

- Order
- Attachment A – Regulated Small MS4s
- Attachment B – Fact Sheet
- Attachment C – NOI and Waiver Requirements
- Attachment D – Provisions for Traditional Permittees
- Attachment E – Provisions for Non-Traditional Permittees
- Attachment F – ASBS Requirements
- Attachment G – TMDL Implementation Requirements
- Attachment H – Trash Implementation Requirements
- Attachment I – Alternative Compliance Capture Option
- Attachment J – Acronyms, Abbreviations, and Glossary

Reorganization

2013 Permit

- Order
- Fact Sheet
- Attachment A - Traditional Small MS4 List
- Attachment B - Non-Traditional Small MS4 List
- Attachment C - Special Conditions for ASBS Discharges
- Attachment D - ASBS dischargers List
- Attachment E - Education and Outreach Requirements
- Attachment F - Standard Provisions
- Attachment G - TMDLs
- Attachment H - Acronyms & Abbreviations
- Attachment I - Glossary

Informal Draft

- Order
- Attachment A – Regulated Small MS4s
- Attachment B – Fact Sheet
- Attachment C – NOI and Waiver Requirements
- Attachment D – Provisions for Traditional Permittees
- Attachment E – Provisions for Non-Traditional Permittees
- Attachment F – ASBS Requirements
- Attachment G – TMDL Implementation Requirements
- Attachment H – Trash Implementation Requirements
- Attachment I – Alternative Compliance Capture Option
- Attachment J – Acronyms, Abbreviations, and Glossary

Reorganization

2013 Permit

- Order
- Fact Sheet
- Attachment A - Traditional Small MS4 List
- Attachment B - Non-Traditional Small MS4 List
- Attachment C - Special Conditions for ASBS Discharges
- Attachment D - ASBS dischargers List
- Attachment E - Education and Outreach Requirements
- Attachment F - Standard Provisions
- Attachment G - TMDLs
- Attachment H - Acronyms & Abbreviations
- Attachment I - Glossary

Informal Draft

- Order
- Attachment A – Regulated Small MS4s
- Attachment B – Fact Sheet
- Attachment C – NOI and Waiver Requirements
- Attachment D – Provisions for Traditional Permittees
- Attachment E – Provisions for Non-Traditional Permittees
- Attachment F – ASBS Requirements
- Attachment G – TMDL Implementation Requirements
- New!** • Attachment H – Trash Implementation Requirements
- New!** • Attachment I – Alternative Compliance Capture Option
- Attachment J – Acronyms, Abbreviations, and Glossary

Reformatted and Reorganized

E.10.c. Construction Site Inspection and Enforcement

- (i) **Task Description** – Within the second year of the effective date of the permit, the Permittee shall use legal authority to implement procedures for inspecting public and private construction projects and conduct enforcement if necessary. The Permittee may leverage existing inspection procedures and personnel to conduct construction site inspections and enforcement.
- (ii) **Implementation Level** – The inspection procedures shall be implemented to verify compliance with the Permittee's construction site storm water control ordinance. At a minimum, inspections must be conducted at priority construction sites (defined below) prior to land disturbance (during the rainy season), during active construction and following active construction. Construction site inspections shall include assessment of compliance with the Permittee's construction site storm water runoff control ordinance, and other applicable ordinances. A Permittee may propose, for Regional Water Board Executive Officer approval, an alternative approach for construction site oversight, provided the Permittee demonstrates the approach will be equally effective at reducing the discharge of pollutants from construction sites to the maximum extent practicable.
- Prior to allowing an operator to commence land disturbance during the rainy season, the Permittee must perform an inspection, to ensure all necessary sediment controls are in place. During active construction, the Permittee shall conduct inspections, based on prioritization of construction sites. Active construction inspections shall include at a minimum: inspection of maintenance of BMPs, effectiveness of BMPs installed and verification that pollutants of concern are not discharged into receiving water bodies.
- Prioritization criteria shall be based on project threat to water quality. Project threat to water quality includes soil erosion potential, site slope, project size and type, sensitivity of receiving water bodies, proximity to receiving water bodies, non-storm water discharges, projects more than one acre that are not subject to the CGP (sites that have obtained an Erosivity Waiver) and past record of non-compliance by the operator of the construction site. Inspection frequencies shall be conducted based on the prioritization criteria described above.
- At the conclusion of the project, the Permittee must inspect to ensure that all disturbed areas have been stabilized and that all temporary erosion and sediment control measures that are no longer needed have been removed as required by the local construction site storm water control ordinance.

D. Construction Site Inspection and Enforcement

1. The Permittee shall use legal authority to implement procedures for inspecting public and private construction projects to verify compliance with the Permittee's construction site storm water control ordinance and conduct enforcement if necessary. New permittees shall develop and implement these procedures within the second year of their enrollment under this Order. Construction site inspections shall include assessment of compliance with the Permittee's construction site storm water runoff control ordinance, and other applicable ordinances.
2. The Permittee may leverage existing inspection procedures and personnel to conduct construction site inspections and enforcement.
3. At a minimum, inspections must be conducted at all construction sites requiring an erosion and sediment control plan prior to land disturbance, during active construction, and following active construction.
4. **Prior to Land Disturbance**
Prior to allowing an operator to commence land disturbance during the rainy season, the Permittee must perform an inspection, to ensure all necessary sediment controls are in place.
5. **During Active Construction**
 - a. Inspection frequencies during active construction shall be based on prioritization criteria, based on project threat to water quality including but not limited to the following:
 - i. Soil erosion potential,
 - ii. Site slope,
 - iii. Projects size and type,
 - iv. Sensitivity of receiving water bodies,
 - v. Proximity to receiving water bodies,
 - vi. Non-storm water discharges,
 - vii. Projects more than one acre that are not subject to the CGP (sites that have obtained an Erosivity Waiver), and
 - viii. Past record of non-compliance by the operator of the

New Permittees

- 2 new traditional permittees
- 37 new State Parks
- 9 new Census Designated Places (for coverage by County permittees)
- Separate tables for State Parks and Census Designated Places



Six Minimum Control Measures

- Public Education and Outreach
- Public Involvement and Participation
- Illicit Discharge Detection and Elimination
- Pollution Prevention and Good Housekeeping
- Construction Site Runoff Control
- Post-Construction Storm Water Management



Public Education & Outreach and Involvement & Participation

- Combined Education/Outreach and Involvement/Participation into a single section
- Moved staff training to other respective sections
- New pet waste management topics



Illicit Discharge Detection & Elimination

- Combined spill response and illicit discharge response plans
- Clarified when dry weather sampling is required
- New industrial and commercial inspections
 - Based on inventory of potential illicit discharge sources
 - 20 percent of facilities annually, each facility once per five years



Pollution Prevention and Good Housekeeping

- Asset Management
 - Inventory
 - Storm drain system
 - Structural controls/BMPs
 - Equipment
 - Map
 - Level of Service
 - Maintenance and Improvement Planning
- Pet waste management
 - Inventory
 - Minimum single site visit
 - Identification of sites with improper disposal
 - Propose increase maintenance or BMPs as necessary



Construction Site Runoff Control

- New program for non-traditionals
 - Policy for projects <1 acre
 - Inventory
 - Inspections
- Additional inspections for traditionals
 - Annual inspection for non-priority sites
 - One dry and one wet season inspection for priority sites



Post-Construction

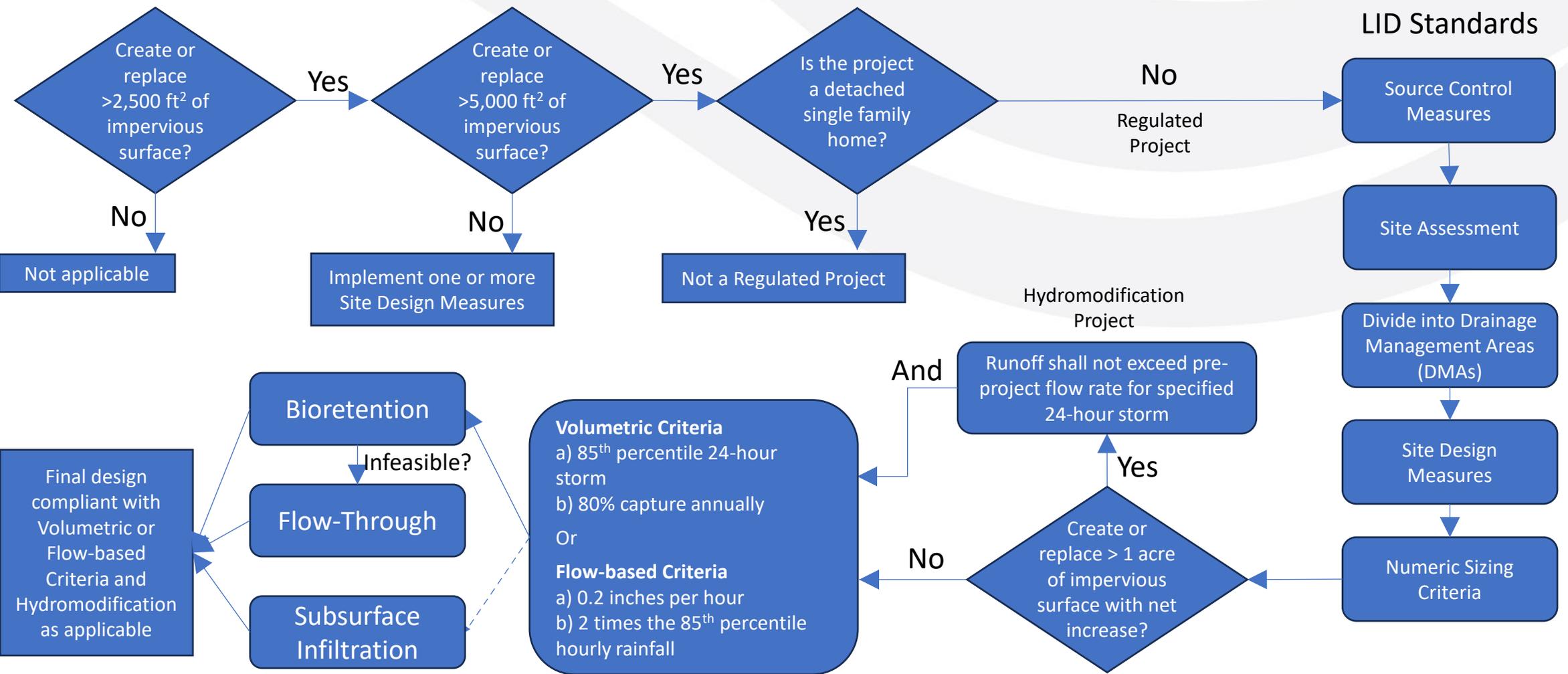
- Changes and clarifications to Regulated Project exceptions
 - Single family home projects over 5,000 square feet are regulated
 - Clarifies definition of routine road maintenance
 - Attempts to reduce piecemealing



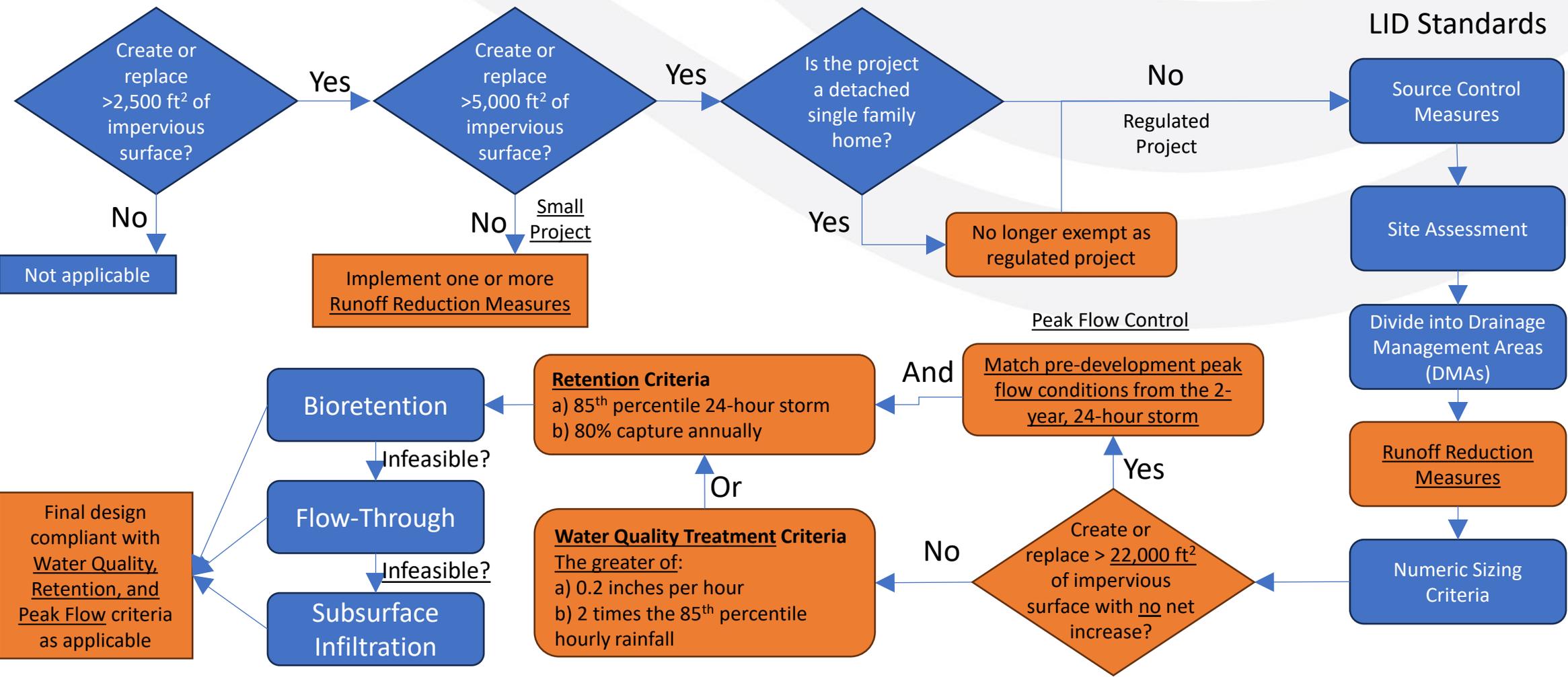
Post-Construction

- Changed name and list of Site Design Measures
- Numeric Sizing Criteria
 - Flow-based and volumetric criteria retitled Water Quality Treatment and Retention Requirements
 - Projects over 22,000 square feet must use the volumetric Retention Requirements
- Hydromodification
 - Decreased threshold from 1 acre to 22,000 square feet
 - Retitled - Peak Flow Control
 - 2-year, 24-hour storm criteria statewide
- Prioritization of BMPs
 - 1. Bioretention
 - 2. Flow-through
 - 3. Subsurface infiltration
- New allowance for off-site compliance
 - Off-site projects in same watershed
 - In-lieu fees

Post-Construction Existing Process

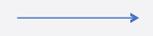


Post-Construction Proposed Process

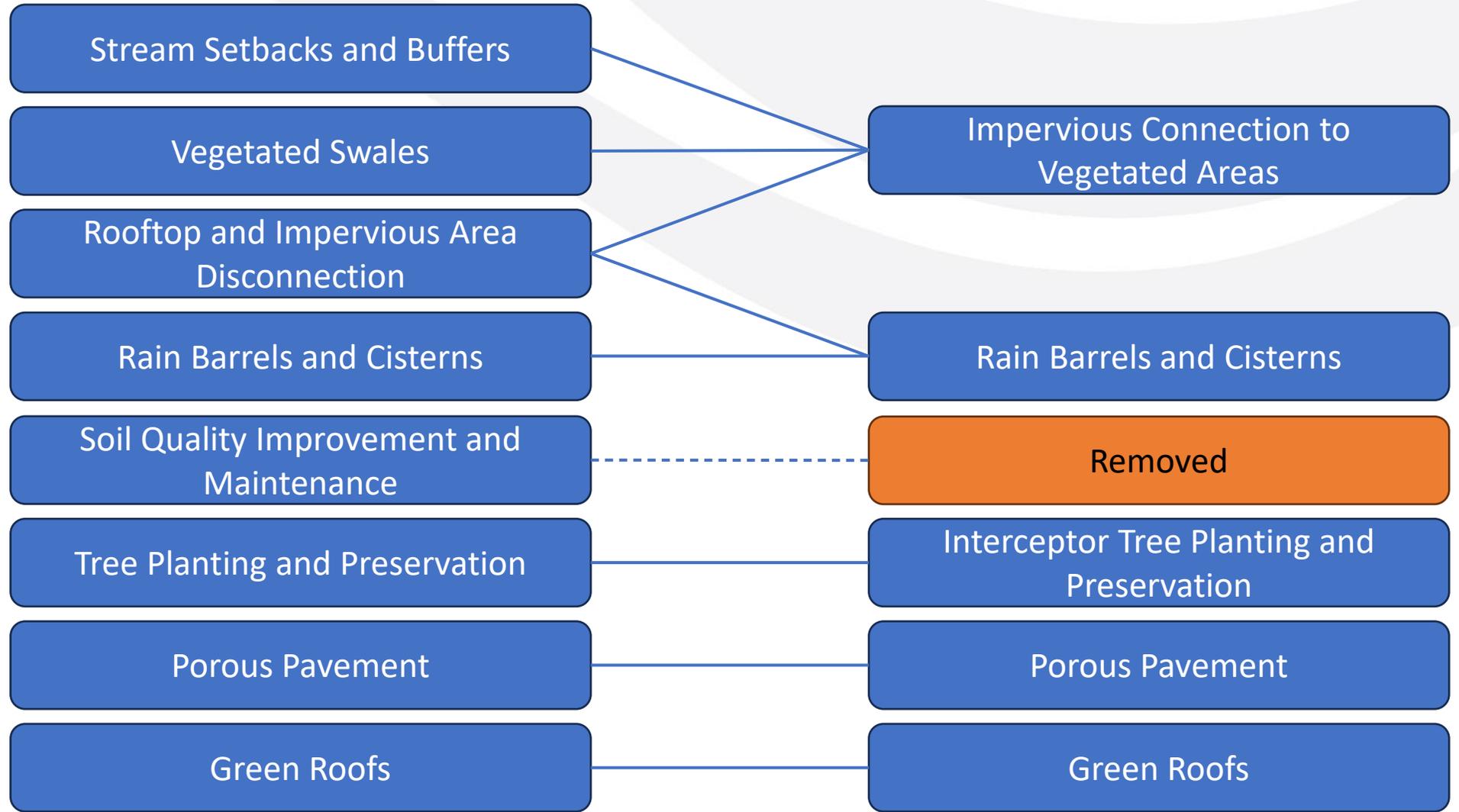


Off-Site Compliance
May offset Retention and Peak Flow criteria

Site Design Measures



Runoff Reduction Measures



Post-Construction Condition Assessment

- Self-Certification Program
 - Adds specificity to assessments required in existing permit
 - Onsite inspections for at least one half of all sites per five years
- Permittee-led Inspection Program
 - New option to forego self-certification
 - Inspection of each site at least once per five years



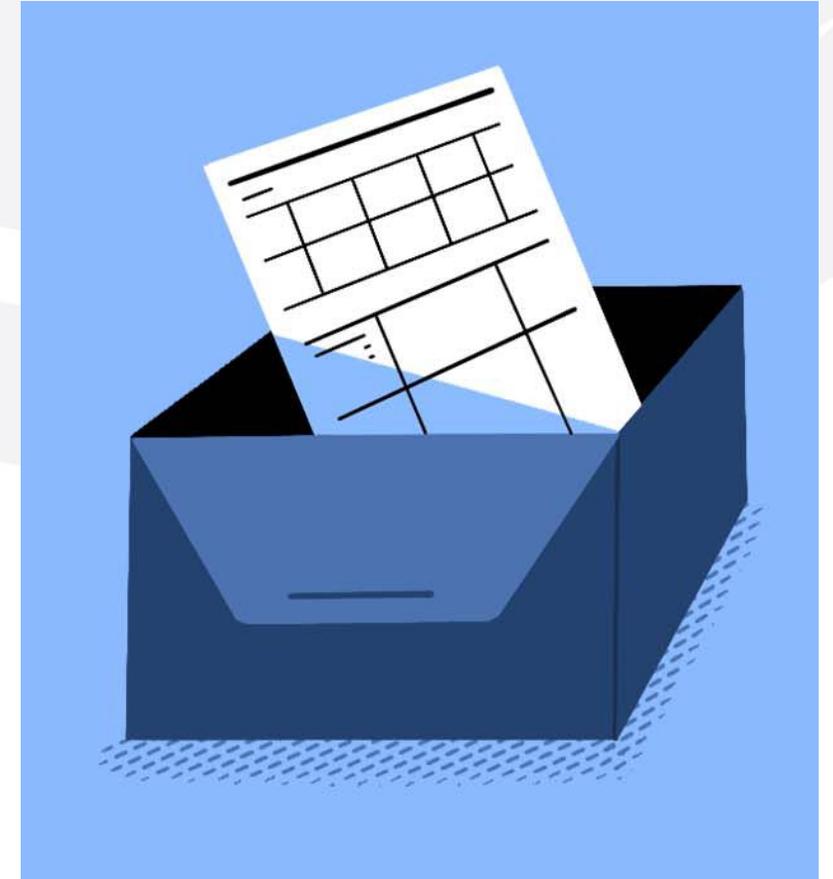
Monitoring

- TMDLs may or may not require monitoring,
- Discharges to 303(d) listed water bodies – consult with Regional Board,
- ASBS monitoring,
- Removed general monitoring - Receiving Water Monitoring and Special Studies (E.13.d).

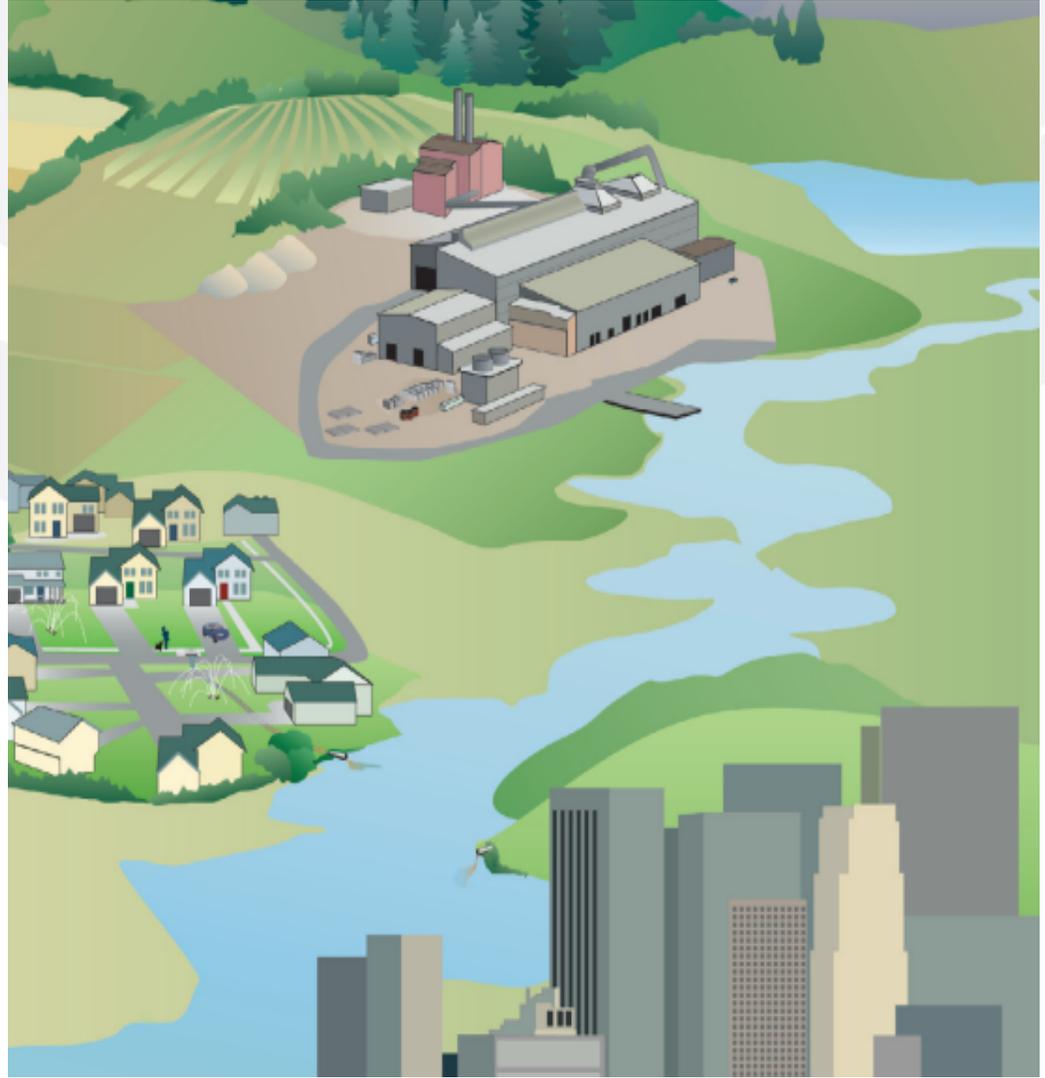


Annual Reporting

- New questions,
- Cost reporting for traditional permittees,
 - Contingent upon Board adoption of policy under development by STORMS,
- Still assessing overlap with US EPA's Electronic Reporting Rule,
- TMDL and ASBS reporting.



Total Maximum Daily Load (TMDL) Implementation Requirements



Total Maximum Daily Loads (TMDL)

- Plans to reduce pollutants and restore water bodies.
- Defines how much of a pollutant a water body can tolerate and still meet water quality standards.
- Implemented through NPDES permits.



Attachment G – TMDL Implementation, Compliance, and Reporting Requirements

Includes:

- 14 new TMDLs.
- TMDLs Grouped by Regional Water Board.
- Unique or grouped implementation requirements for each TMDL.

JULY 2024
Informal Draft Small MS4 Permit for Public Comment

Order WQ 20XX-XXXX-DWQ
NPDES No. CAS000004

ATTACHMENT G – TOTAL MAXIMUM DAILY LOAD IMPLEMENTATION, COMPLIANCE, AND REPORTING REQUIREMENTS

OVERVIEW

This Attachment provides the implementation, compliance, and reporting requirements for the identified Permittee to comply with total maximum daily load (TMDL) requirements. The Permittee is identified in the TMDL as responsible for implementing the requirements in the TMDL. This Attachment includes the following:

- Technical requirements for best management practices, and
- TMDL implementation, monitoring, reporting, and compliance requirements.

Wasteload allocations, descriptions, responsible entities, and compliance deadlines for the applicable TMDLs are also summarized in Attachment B (Fact Sheet), which is incorporated by reference into this Attachment.

G1. DESIGN, CONSTRUCTION, AND MAINTENANCE OF BEST MANAGEMENT PRACTICES FOR TMDL POLLUTANT REDUCTION

The Permittee shall comply with best management practices design, construction, and maintenance requirements in Attachments D (Traditional Permittee Provisions) and E (Non-Traditional Permittee Provisions) of this Order.

G2. TMDL REPORTING REQUIREMENTS

1. TMDL Annual Reporting. Each responsible Permittee shall annually report the status of its TMDL implementation in accordance with the sections titled Annual TMDL Compliance Reporting, Water Quality Monitoring, and Program Effectiveness in Attachments D or E (as applicable). Annual reports are due October 15, and cover the reporting period of July 1 through June 30.
2. Regional Water Board-Specific Reports. For Regional Water Board-specific TMDL reports required under this Attachment, the responsible Permittee shall submit its reports for review and consideration of approval to the appropriate Regional Water Board Executive Officer in coordination with the State Water

Fourteen TMDLs Added

- 1 in the North Coast region
- 5 in the San Francisco Bay region
- 5 in the Central Coast region
- 1 in the Central Valley region
- 2 in the Santa Ana region



TMDL Information and Requirements

G4.3.3 TMDL for Pathogens in Watsonville Slough

Responsible Permittees: City of Watsonville, County of Santa Cruz

Impaired Water Body: Watsonville Slough, Struve Slough, Harkins Slough, Gallighan Slough, Hanson Slough

TMDL Implementation Requirements: The Permittee identified for this TMDL, above, shall each develop and implement a Wasteload Allocation Attainment Plan that identifies the actions they will take to ensure their wasteload allocation is achieved. The Waste Load Allocation Attainment Plan shall include all information required under section G4.3.1. The Permittee is required to implement best management practices specifically targeting fecal coliform loading. Required actions include development and implementation of:

1. Public education regarding fecal coliform sources and associated health risk,
2. Enforceable means of addressing pet waste and wild animals that are attracted to stormwater infrastructure, and
3. Elimination of illicit discharges.

The Permittee must also monitor receiving water and stormwater outfalls that may be contributing fecal coliform to the sloughs.

Final Compliance Deadlines: The final compliance deadline was November 20, 2016.

TMDL Reporting Requirements: The Permittee shall submit TMDL Annual Reports as specified in sections G2 and G4.3.1, above. The Permittee shall submit the TMDL Demonstration of Compliance Report as specified in section G2.

- Each TMDL includes the following basic information and requirements:
 - Responsible permittees,
 - Impaired water body,
 - Implementation requirements,
 - Monitoring (if required),
 - Deadlines, and
 - Reporting.

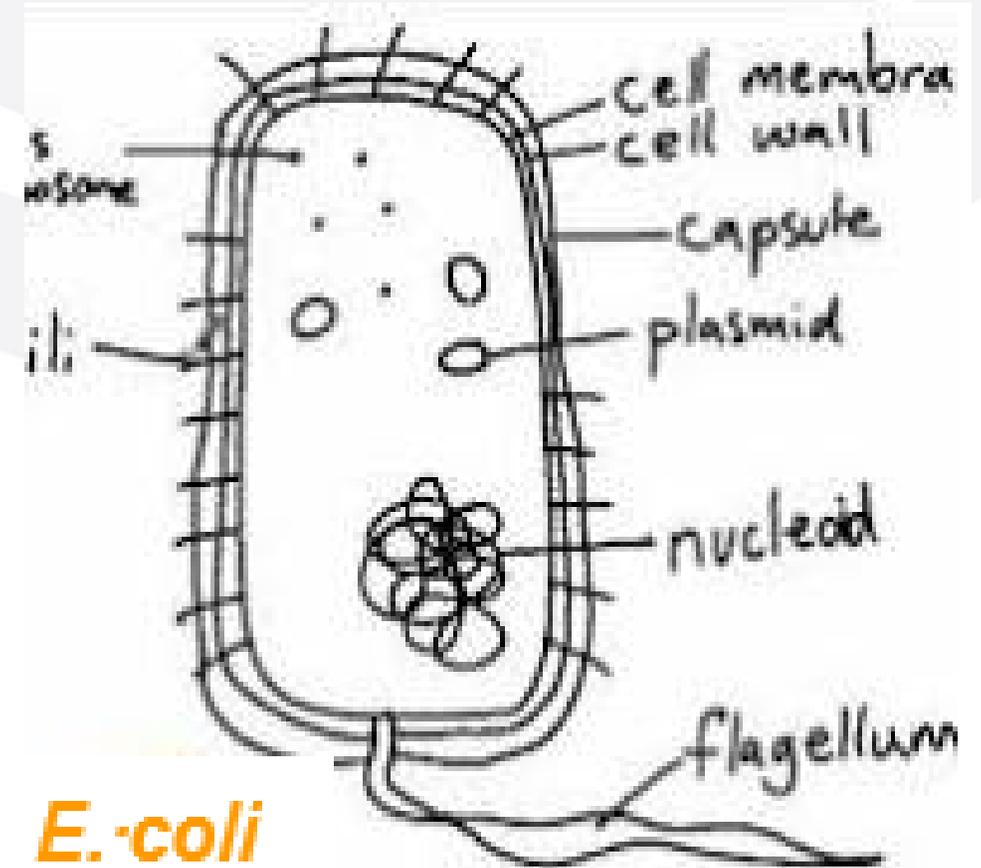
Standardized Implementation Plans



- Standardized implementation plans are required by three regional water boards:
 - San Francisco Bay region – General Approach for Controlling Bacteria.
 - Los Angeles region – Standard Implementation Action Requirements for Bacteria.
 - Central Coast region – Updated Wasteload Allocation Attainment Plan.

San Francisco Bay Region – Standard General Approach for Controlling Bacteria

- Requires specific information for bacteria and pathogen TMDLs.
- Requires bacteria:
 - Evaluation,
 - Detection,
 - Source control, and
 - Compliance with receiving water limitations and wasteload allocation.



Los Angeles Region – Standard Implementation Actions for Bacteria TMDLs



- Carries over the requirements from the existing permit.
- Permittees continue to implement selected paths,
- Either a
 - Cooperative Agreement with Phase I MS4 Watershed Management Program, or
 - Program Plan for Bacteria TMDLs.

Central Coast Region – Updated Wasteload Allocation Attainment Plan

- Strategy,
- Source analysis,
- Selection and implementation of BMPs,
- Quantitative Numeric Analysis,
- Monitoring program,
- Schedule,
- Effectiveness assessment and adaptive management, and
- Collaboration with other entities.

TMDL Monitoring

Many TMDLs include monitoring requirements:

- 9 in the San Francisco Bay region,
- 20 in the Central Coast region,
- 15 in the Los Angeles region,
- 7 in the Santa Ana region, and
- 2 in the San Diego region



TMDL Reporting Requirements

1. TMDL Annual Reporting,
2. Regional Water Board-Specific Reports,
3. TMDL Demonstration of Compliance Report,
4. Request for Time Schedule Order,
5. Request for approval of Cooperative Projects.



Alternative Compliance Options

- Attachment I
- Satisfy
 - TMDL Compliance Demonstration;
 - Discharge Prohibitions; and
 - Effluent and Receiving Water Limitations.
- On-site and off-site (collaborative) options.
- Capture 85th percentile storm.



Trash Implementation Requirements



Statewide Trash Provisions

The Trash Provisions amended the following State Water Board Water Quality Control Plans:

- Appendix D of the Water Quality Control Plan for Ocean Waters of California.
- Appendix E of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California.



Trash Provisions Implementation Requirements

- Effective December 2, 2015.
- Includes compliance deadlines.
- Includes both Traditional and Non-Traditional municipal storm water permittees.
- Directs issuance of 13383 Water Code Orders to all permittees on June 1, 2017, which required
 - Selection of compliance track, and
 - Submittal of map identifying Priority Land Uses.



Trash Provisions and Compliance Tracks

Track 1

Install, operate, and maintain full capture systems (FCS) in storm drains to capture trash in runoff.

Track 2

Install, operate, and maintain any combination of FCS, Multi-Benefit Projects, and other treatment controls, and/or institutional controls to capture or reduce trash in runoff.

Compliance Track 1 – Install Trash Full Capture Systems (FCS) Only

- Install FCS at all Priority Land Uses,
- FCS include Conditionally Certified Multi-benefit Systems,
- FCS must trap all particles 5-millimeter or greater, and
- FCS must have a design treatment capacity that is either:
 - Not less than the peak flow rate resulting from a one-year, one-hour storm event (design storm) in the subdrainage area, or
 - Sized and designed to carry at least the same flows as the corresponding storm drain.



Compliance Track 2 – Full Capture System (FCS) Equivalency

- Demonstrate FCS Equivalency by implementing trash control measures that reduce an equivalent amount of trash as the installation FCS at all Priority Land Uses.
- Select areas of trash generation for treatment.
- Establish baseline trash generation levels.
- Show trash reduction via trash assessments.



Priority Land Uses

- High density residential areas with 10-or-more dwelling units per acre.
- Industrial land uses.
- Commercial land uses.
- Mixed urban land uses.
- Public transportation stations.



Attachment H Trash Implementation Requirements

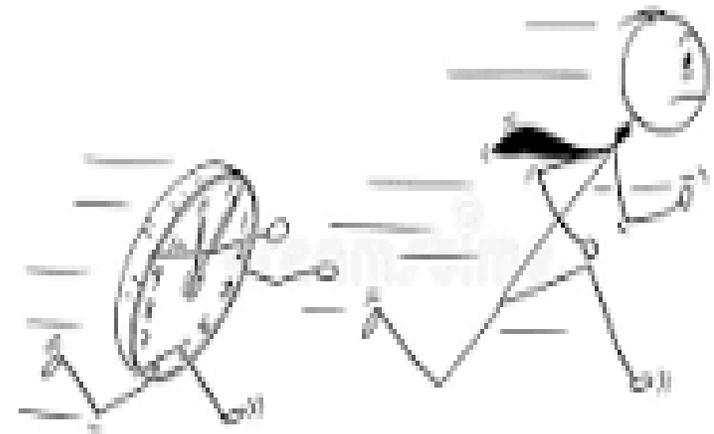
H1. Trash Discharge Prohibition

- Discharge of trash to surface waters of the State or the deposition of trash where it may be discharged into surface waters of the State is prohibited.
- Comply with the Trash Discharge Prohibition by complying with the requirements of Attachment H.



H2. Compliance Deadline

- Renewal Permittees – Demonstrate compliance by December 2, 2030.
- New Permittees – Demonstrate compliance;
 - Within ten years of the Order's effective date, or
 - By the effective date of Permittee's Designation, whichever is later.



H4. Certified Trash Full Capture Systems

- Must trap particles 5-mm or greater in diameter.
- Permittees must size the system based on the flow generated from a 1-year, 1-hour storm.
- List of Certified FCS on State Board website and on the CASQA website (where certified FCS applications are available for view or download).
- Manufacturers may apply to certify a new Trash FCS.
- Separate application is available for certification of project specific Trash FCS.

H5. Compliance Tracks

Requirements organized by:

- Traditional Track 1 Permittees
- Traditional Track 2 Permittees
- Non-Traditional Track 1 Permittees
- Non-Traditional Track 2 Permittees



H6. Trash Implementation Inventory

- Permit requirements are organized by:
 - Traditional Track 1 Permittees,
 - Non-Traditional Track 1 Permittees,
 - Traditional Track 2 Permittees, and
 - Non-Traditional Track 2 Permittees.
- Update the inventory annually.
- Distinguish between already treated and remaining to be treated acreage.

H7. Trash Generation Map

- Permit requirements organized by:
 - Traditional, and
 - Non-Traditional.
- Submit new/updated trash generation map via SMARTS.
- Color coded identifying low, moderate, high, and very high trash generation areas.

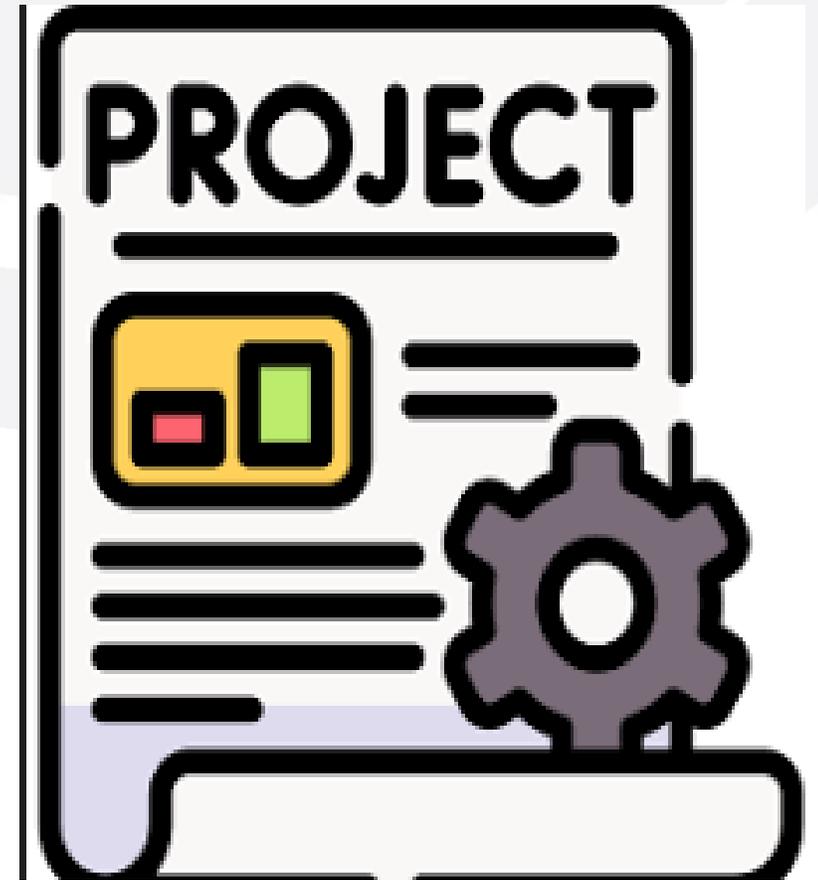


H8. Trash Assessment Plan

- On-land Visual Trash Assessment Methodology or other assessment methodology upon approval.
- Renewal permittees may rely on previous trash assessments but must update for new trash generation areas.
- Map depicting previous and future trash assessment areas.
- Annual trash assessments of all already treated areas.
- Trash assessment field procedures.
- Quality assurance and control procedures.

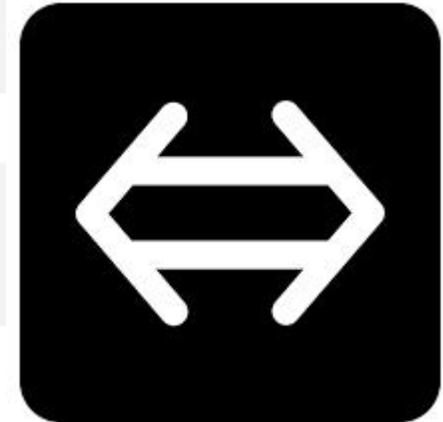
H9. Trash Implementation Plan

- Schedule for installation/implementation of FCS.
- Location, area, trash reduction, and design treatment capacity of each FCS.
- Annual evaluation of progress towards achieving milestones.
- Coordination with Caltrans for areas with trash generation impacted by both the permittee and Caltrans.



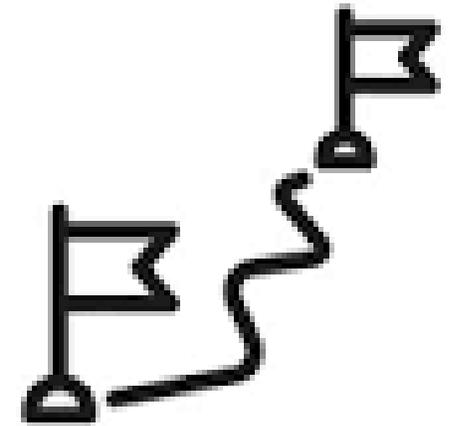
H10. Full Capture System Equivalency for Permittees in Track 2

Track 2 permittees must demonstrate that the combinations of treatment controls achieve FCS Equivalency.



H11. Trash Reduction Milestones for Renewal Permittees

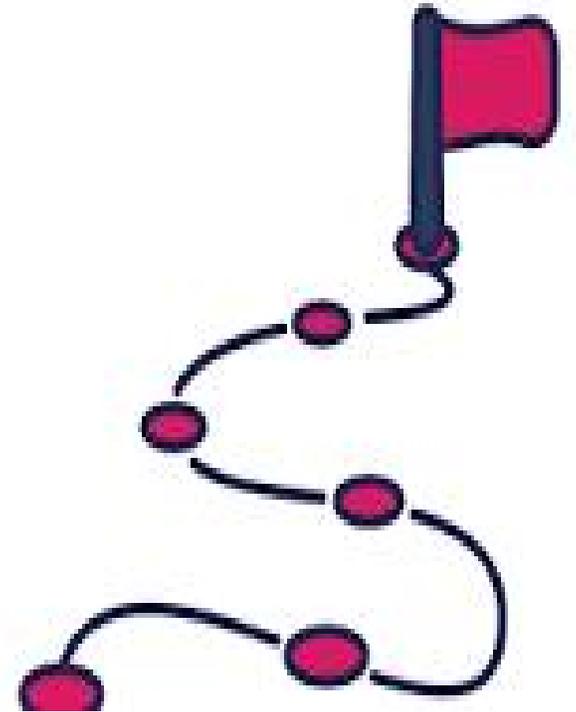
- First Milestone: 30% coverage on or before Dec. 2, 2026.
- Second Milestone: 65% on or before Dec. 2, 2028.
- Final Compliance: 100% on or before Dec. 2, 2030.
- Permittee may request approval of Alternate First and Second Milestones.



Milestone

H12. Trash Reduction Milestones for New Permittees

- First Milestone: 40% within 4 years of effective date.
- Second Milestone: 70% within 7 years of effective date.
- Full Compliance: 100% within 10 years of effective date.
- Requests for Alternate 1st and 2nd milestones must be approved by Regional Water Board Executive Officer.



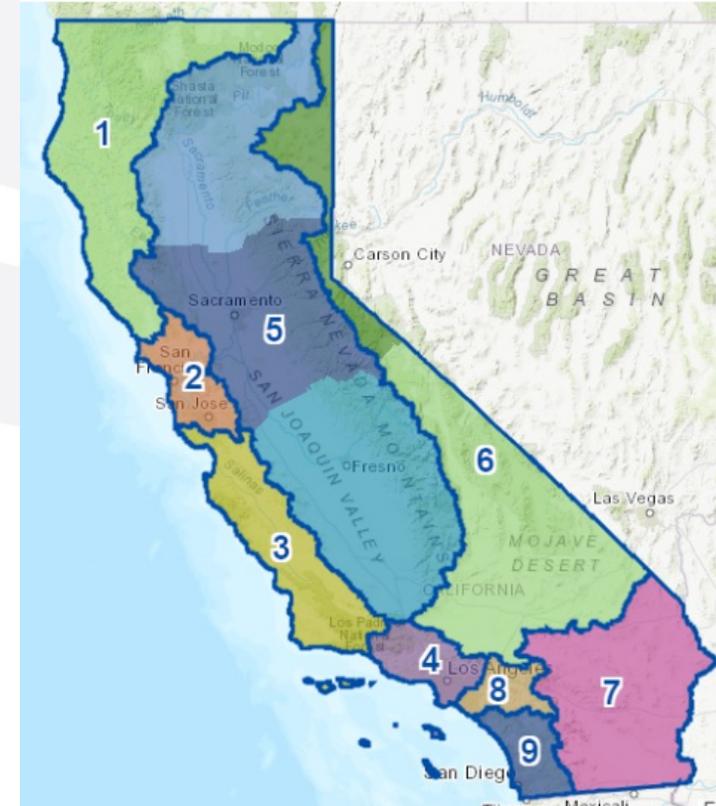
H13. Inspection & Maintenance

- Minimum Inspection and Maintenance Requirements
 - Certified FCS.
 - Categorically Certified Multi-Benefit Systems.
 - Other Treatment Controls and Institutional Controls Maintenance.
- Develop Inspection and Maintenance schedule and frequency that maintains design treatment capacity.
- Frequency must increase when a FCS is 50% or more filled with trash.



H14. Regional Board Determinations

- The Regional Water Board Executive Officer may determine that additional areas generate substantial amounts of trash (such as parks, recreation areas, high traffic roads, etc.).
- The Regional Water Board Executive Officer may give up to 10 years to comply for new, additional areas.



H15. Record Retention

Permittees must retain the following records:

- Current Trash Implementation Inventory (no submittal),
- Current Trash Generation Map (submit via SMARTS),
- Current Trash Implementation Plan (no submittal),
- Trash Assessment Plan (no submittal), and
- Inspection and maintenance records including any inspection and maintenance schedules as required in H 13.1 (no submittal).

H16. Annual Trash Monitoring Report

- Both Track 1 and 2 permittees must report:
 - FCS installed and to be installed,
 - Total # of installed FCS and total acreage,
 - Certification that each installed system is operated and maintained to consistently achieve the design treatment capacity, and
 - Description and timeline to address deficiencies.
- Track 2 permittees must also report:
 - Other treatment/institutional controls and respective acreage, and
 - Effectiveness of controls based on trash assessments.

H17. Reporting Items

- Within 60 days of designation, new permittees select Track 1 or Track 2.
- Within 180 days of effective date, submit Trash Generation Map and annually submit updated Trash Generation Map via SMARTS.
- Submit annual Trash Monitoring Report via SMARTS.
- Annually provide their local vector control agencies with the name and location of existing Certified FCS and proposed Certified FCS that will be installed during the following reporting year.

Areas of Special Biological Significance



ASBS Implementation Requirements

- Permit implements the Exceptions to the California Ocean Plan for Selected Discharges into ASBS,
- ASBS are located on the coast and within the following Regional Water Quality Control Board jurisdictions:
 - North Coast,
 - San Francisco Bay,
 - Central Coast, and
 - Santa Ana.



ASBS - Regional Water Boards

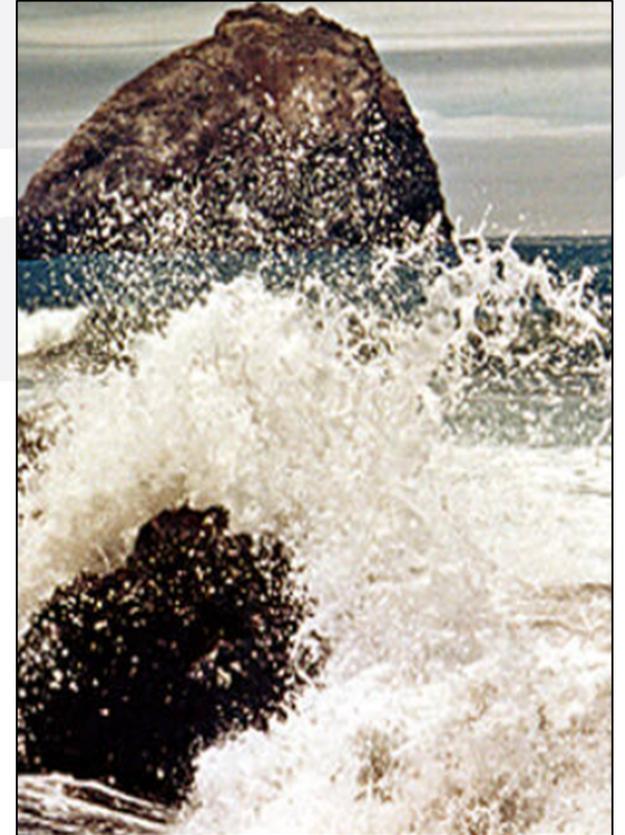
Regional Water Board	ASBS
North Coast	Trinidad Head, King Range, Gerstle Cove, Jug Handle Cove, Redwoods State and National Park
San Francisco Bay	Duxbury Reef, James V. Fitzgerald, Point Reyes National Seashore
Central Coast	Pacific Grove, Carmel Bay, Año Nuevo, Julia Pfeiffer Burns, Point Lobos, James V. Fitzgerald
Santa Ana	Irvine Coast

Submit Updated ASBS Compliance Plan

- Updated plan plus original plan,
- Revised monitoring plan for resampling (if resampling not completed under the previous permit),
- State whether monitoring and resampling were completed,
- Monitoring results,
- Updated BMP installation schedule,
- Updated map with installed and planned BMP locations, priority discharge locations, sheet flow drainage, and
- Plans to complete Core Discharge Monitoring Program and/or Ocean Receiving Water & Reference Area Monitoring.

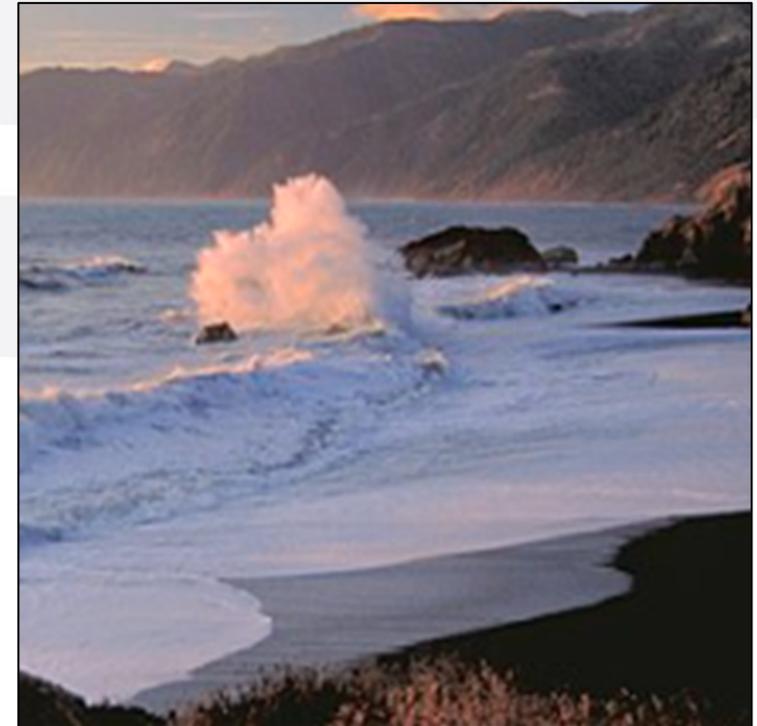
Core Discharge and Ocean Receiving Water Monitoring

- Core Discharge Monitoring Program
 - Timing and storm size,
 - Runoff flow measurements, and
 - Storm event sampling.
- Ocean Receiving Water and Reference Area Monitoring
 - Individual monitoring program, and
 - Regional integrated monitoring program.



ASBS Reporting

- Annual ASBS Status Report due October 15,
- Reporting period is July 1 – June 30,
- Provide status of compliance,
- Describe sampling/resampling results,
- Status of BMP installations,
- Low-impact development BMPs installed over the reporting year, and
- Tabulated monitoring results.



Next Steps for Permit Development

- High level response to informal comments
- Draft permit revisions based on informal comments
- Draft permit released for Public Comment Period
- Public hearing
- Consideration and response to all public comments
- Draft permit revisions based on comments
- State Water Board considers adoption of draft permit during Board meeting

15 Minute Break

Email Questions

- Email to SmallMS4Workshop@waterboards.ca.gov
- Subject line: One topic per email, such as Traditional/Non-Traditional, Trash, TMDL, BMPs, Optional Compliance, ASBS, etc.
- Include the following information in the email:
 - Name;
 - Organization's name; and
 - Questions.

Technical assistance for viewing the workshop:

- Email SmallMS4Workshop@waterboards.ca.gov
- Subject line: Technical Assistance
- Describe the viewing issue.