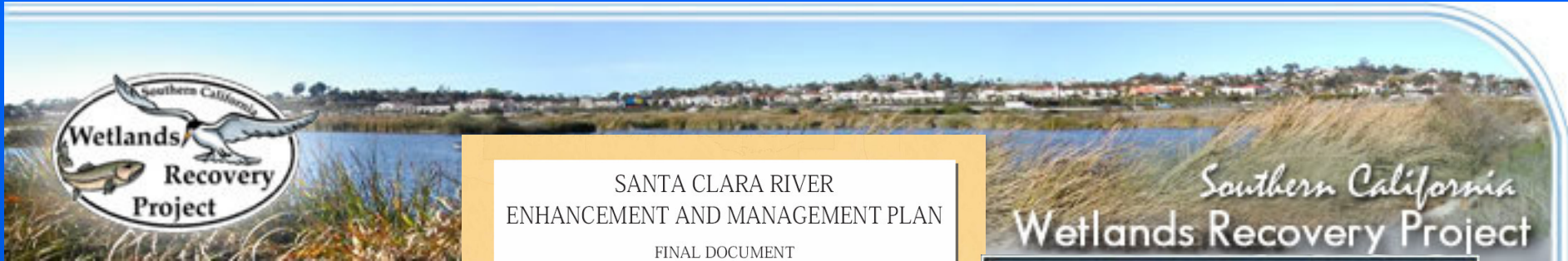


TMDL Program Consistency

Mark Pumford – City of Oxnard





SANTA CLARA RIVER ENHANCEMENT AND MANAGEMENT PLAN

FINAL DOCUMENT

Ventura County
Watershed Protection District

Los Angeles County
Department of Public Works



May 2005

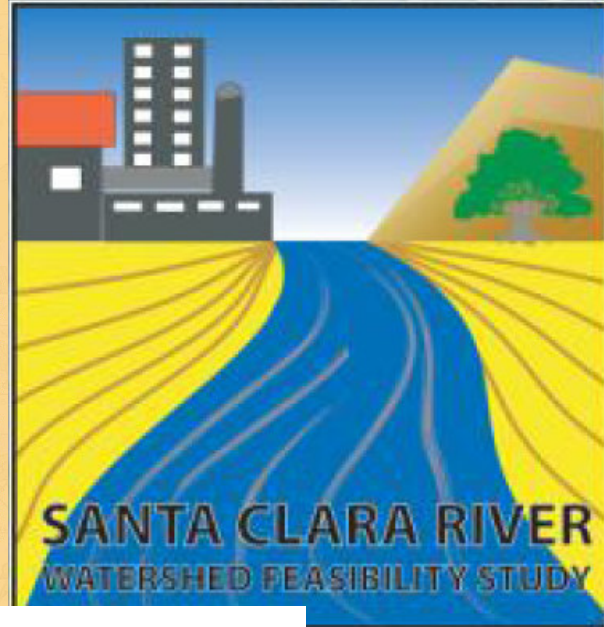
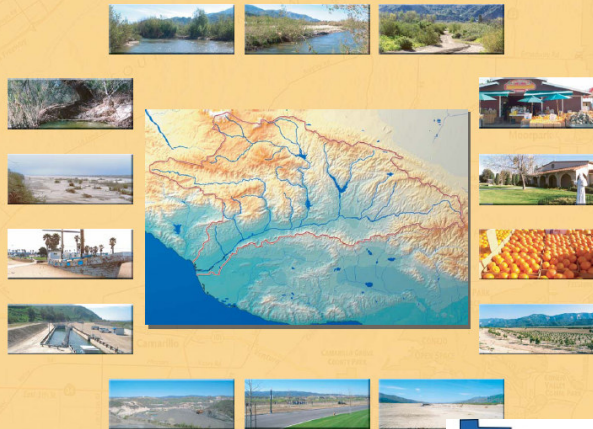


Southern California Wetlands Recovery Project

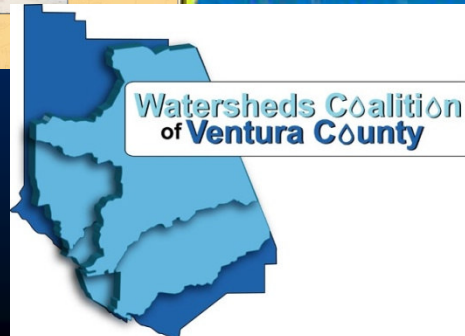
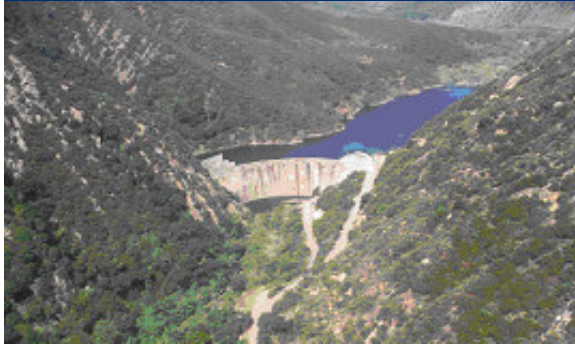
CALLEGUAS CREEK



A COOPERATIVE STRATEGY FOR
RESOURCE MANAGEMENT & PROTECTION







SANTA CLARA RIVER WATERSHED FEASIBILITY STUDY






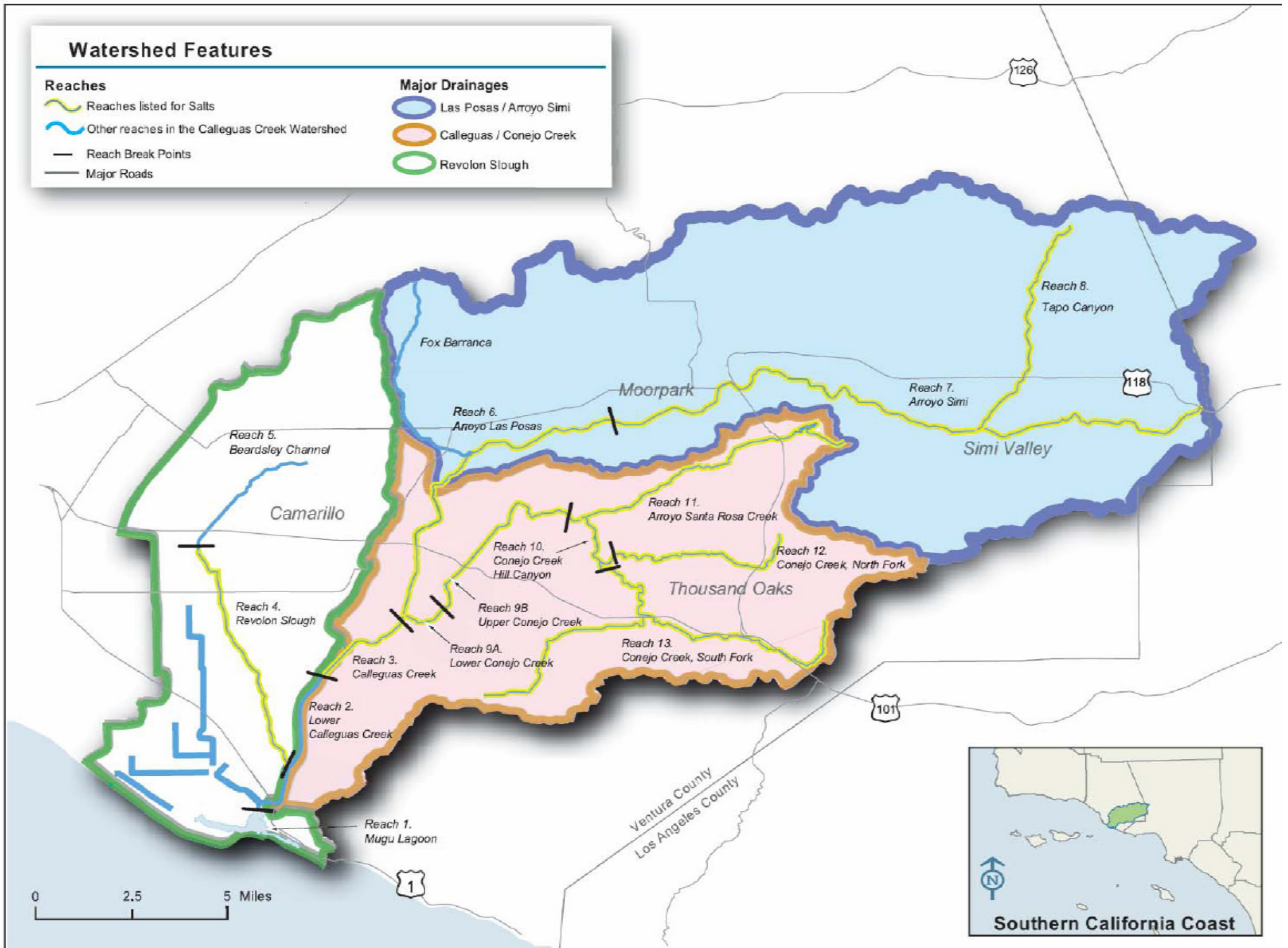
Watershed Features

Reaches

-  Reaches listed for Salts
-  Other reaches in the Calleguas Creek Watershed
-  Reach Break Points
-  Major Roads

Major Drainages

-  Las Posas / Arroyo Simi
-  Calleguas / Conejo Creek
-  Revolon Slough



CCWS Management Plan

- **Collaborative effort since 1996**
- **Stakeholders include POTWs, MS4s, CalTrans, Navy, Agriculture**
- **Developed 4 EPA-approved TMDLs**
- **Monitoring Program and QAPP**
- **MOA developed to share costs**

TMDLs in NPDES Permits

- **We agree with permit findings that NPDES permits must be consistent with TMDLs**
- **The disagreement is whether the provisions of the draft permit are consistent with Ventura County TMDLs**

Calleguas Toxicity TMDL

- “Stormwater WLAs will be incorporated into NPDES permits as **receiving water limits** measured in-stream at the base of each subwatershed
- and will be **achieved through the implementation of BMPs ...”**

Santa Clara Nitrogen TMDL

- **“Ammonia, nitrite, and nitrate reductions will be regulated through effluent limits prescribed in POTW ...NPDES permits, Best Management Practices required in NPDES MS4 Permits, and SWRCB Management Measures for non point source discharges.”**
- **Draft permit regulates reductions through end-of-pipe numeric effluent limits**

Draft NPDES Permit

- **Applies TMDL WLAs for MS4 at End-of-Pipe**
- **Applies these numeric effluent limits to each major stormwater outfall**
- **Imposes a TMDL compliance monitoring program**

Calleguas OC/PCB TMDL

Parameter	TMDL Interim Limit (ng/g sediment)	Draft Permit Threshold Value (ng/L water)
Chlordane	17	1.2
4,4-DDD	66	6.0
4,4-DDE	470	1.2
4,4-DDT	110	10.0
Dieldrin	3	10.0
PCBs	3800	31.0
Toxaphene	260	500

TMDL Monitoring Inconsistency

- **TMDL requires a monitoring program**
- **Calleguas Creek TMDL**
 - **End-of-pipe**
 - **In-stream monitoring**
 - **Will cost stakeholders \$1M per year.**
- **Draft permit**
 - **Monitoring at each major outfall and drainage basin, and will**
 - **Add at least \$1.5 million per year to cost.**

Requirement for Consistency

- **EPA Regulations require that effluent limits in NPDES permits be “...consistent with the assumptions and requirements of any available waste load allocation ... prepared by the state and approved by EPA.”
40 CFR 122.44(d)(1)(vii)B)**

Conclusion

- **The Draft Permit is inconsistent with the approved TMDLs and WLAs**
- **Federal regulations and guidance do not mandate numeric effluent limits**

Recommendation

- **Modify the Draft Permit to be consistent with WLAs in approved TMDLs**
- **Delete requirement for TMDL monitoring where submitted monitoring program exists**