CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN DIEGO REGION

MONTHLY MANAGEMENT

October 2004

November 10, 2004

APPENDED TO EXECUTIVE OFFICER REPORT

CONTENTS

Significant NPDES Permits, WDRs, and RB Actions—November 10, 2004

SIGNIFICANT NPDES
PERMITS, WDRS, AND RB ACTIONS

DATE OF REPORT NOVEMBER 10, 2004									
NAME OF PERMIT/WDR/RB ACTION	Action Type	Initial Document Application Complete	Dish./RWQ Limits and Monitoring Plan Known	Draft Complete	Public Rev. & Comment	BOARD HEARING & ADOPTION	Consent Item	COMMENTS	Staff
DECEMBER 8, 2004 RB MEETING									
AT RB OFFICE									
TOT. MAX. DAILY LOAD--SHELTER ISL. YACHT BASIN SAN DIEGO BAY--DISSOLVED COPPER	Basin Plan Amendment	NA	100%	100%	60%	December 8, 2004	No	Consider adoption of Basin Plan Amendment	Dobalian
TOTAL MAX. DAILY LOAD--RAINBOW CREEK FOR NITROGEN AND PHOSPHORUS	Basin Plan Amendment	NA	100%	90%	0%	December 8, 2004	No		Monji;Tobler
RAMONA UNIFIED SCHOOL DISTRICT HANSON ELEMENTARY SCHOOL	New WDRs	100%	100%	0%	0%	December 8, 2004	No		Bryan Ott
FALLBROOK PUBLIC UTILITY DISTRICT FALLBROOK RECLAMATION PROJECT	Master Reclamatior Permit Update	NA	100%	80%	0%	December 8, 2004	Yes		Vasquez
DS WATERS OF AMERICA LP SPARKLETTS LAKESIDE FACILITY	Revision WDRs	100%	100%	80%	0%	December 8, 2004	Yes		Felix
SO. ORANGE CO. WASTEWATER AUTHORITY IRVINE RANCH DESALTER PROJECT	NPDES Permit Revision	100%	100%	100%	0%	December 8, 2004	Yes		Hanson
FEBRUARY 9, 2005 RB MEETING									
NASSCO AND SOUTHWEST MARINE SHIPYARDS SEDIMENT CLEANUP SAN DIEGO BAY	Public Testimony CAO	NA	NA	60%	0%	February 9, 2005	No	Conduct hearing	Alo
CABRILLO LLC ENCINA POWER PLANT CARLSBAD	NPDES Permit Renewal	100%	80%	0%	0%	February 9, 2005	No		Phillips
SO. CALIF. EDISON CO. SAN ONOFRE NUCLEAR POWER STATION UNIT NOS. 2, and 3	NPDES Permit Renewal	100%	80%	50%	0%	February 9, 2005	No	NPDES Workplan FY 2004-05	Navrozali
SAN ELIJO JOINT POWERS AUTHORITY SAN ELIJO WPCF	NPDES Permit Renewal	100%	90%	0%	0%	February 9, 2004	No	NPDES Workplan FY 2004-05	Kelley
CITY OF ESCONDIDO HALE AVE. RESOURCE RECOVERY FACILITY	NPDES Permit Renewal	100%	90%	0%	0%	February 9, 2004	No	NPDES Workplan FY 2004-05	Kelley
CITY OF OCEANSIDE OCEAN OUTFALL DISCHARGE TO PACIFIC OCEAN	NPDES Permit Renewal	80%	80%	0%	0%	February 9, 2005	No		Kelley
FALLBROOK PUD / OCEANSIDE OCEAN OUTFALL DISCHARGE TO PACIFIC OCEAN	NPDES Permit Renewal	80%	80%	0%	0%	February 9, 2005	No		Kelley
CULLIGAN WATER CONDITIONING SAN DIEGO	NPDES Permit Renewal	50%	100%	0%	0%	February 9, 2005	Yes		Phillips
IMANI TEMPLE OF TEMECULA ONSITE ALTERNATIVE DISPOSAL SYSTEM	New WDRs	100%	90%	80%	0%	February 9, 2005	Yes		Morris

SIGNIFICANT NPDES
PERMITS, WDRS, AND RB ACTIONS

DATE OF REPORT NOVEMBER 10, 2004									
NAME OF PERMIT/WDR/RB ACTION	Action Type	Initial Document Application Complete	Dish./RWQ Limits and Monitoring Plan Known	Draft Complete	Public Rev. & Comment	BOARD HEARING & ADOPTION	Consent Item	COMMENTS	Staff
MARCH 9, 2005 RB MEETING									
NASSCO AND SOUTHWEST MARINE SHIPYARDS SEDIMENT CLEANUP SAN DIEGO BAY	Adoption: CAO	NA	NA	0%	0%	March 9, 2005	No		Alo
MOUNTAIN WATER ICE CO. OCEANSIDE	NPDES Permit Renewal	50%	100%	0%	0%	March 9, 2005		NPDES Workplan FY 2004-05	Phillips
CITY OF ESCONDIDO BRINE WASTE DISCHARGE TO SAN ELIJO OCEAN OUTFALL	New NPDES Permit	0%	80%	0%	0%	March 9, 2005		NPDES Workplan FY 2004-05	Kelley
APRIL 13, 2005 RB MEETING									
SEAWORLD SAN DIEGO MISSION BAY	NPDES Permit Renewal	0%	80%	0%	0%	April 13, 2005		NPDES Workplan FY 2004-05	Phillips
ENCINA WASTE WATER AUTHORITY CARLSBAD ENCINA OCEAN OUTFALL	NPDES Permit Renewal	0%	80%	0%	0%	April 13, 2005		NPDES Workplan FY 2004-05	Kelley
JACK AND MARK STIEFEL DAIRY RIVERSIDE COUNTY	NPDES Permit Renewal	0%	100%	0%	0%	April 13, 2005		NPDES Workplan FY 2004-05	Phillips
MAY 11, 2005 RB MEETING									
SAN DIEGO PORT DISTRICT FISH FISH SORTING SAN DIEGO BAY	NPDES Permit Renewal	0%	100%	0%	0%	May 11, 2005		NPDES Workplan FY 2004-05	Phillips
JUNE 8, 2005 RB MEETING									
GROUNDWATER EXTRACTION GENERAL PERMIT FOR SAN DIEGO BAY	NPDES Permit Renewal	NA	50%	0%	0%	June 8, 2005		NPDES Workplan FY 2004-05	Phillips
ONE AMERICA PLAZA BLDG. GROUNDWATER DISCHARGE TO SAN DIEGO BAY	New NPDES Permit	0%	50%	0%	0%	June 8, 2005		NPDES Workplan FY 2004-05	Phillips
EMBASSY SUITES HOTEL GROUNDWATER DISCHARGE TO SAN DIEGO BAY	New NPDES Permit	0%	50%	0%	0%	June 8, 2005		NPDES Workplan FY 2004-05	Phillips
PENDING / UNSCHEDULED ACTIONS									
MISSION VALLEY TERMINALS --SHELL OIL PETITION FOR SEPARATE CAO	Hearing: CAO	NA	NA	0%	0%				Dorsey

SIGNIFICANT NPDES
PERMITS, WDRS, AND RB ACTIONS

DATE OF REPORT NOVEMBER 10, 2004									
NAME OF PERMIT/WDR/RB ACTION	**Action Type**	**Initial Document Application Complete**	**Dish./RWQ Limits and Monitoring Plan Known**	**Draft Complete**	**Public Rev. & Comment**	**BOARD HEARING & ADOPTION**	**Consent Item**	**COMMENTS**	**Staff**
GREGORY CANYON LANDFILL	New WDRs	90%	10%	0%	0%				Tamaki
NORTH SAN DIEGO COUNTY									
MISSION VALLEY TERMINALS ADDENDUM TO	Hearing: CAO	NA	25%	0%	0%			Conduct Hearing	Dorsey
CAO NO. 92-01									

ATTACHMENT A-3

LESSONS LEARNED - SAM FALL 2004 FORUM
SEPTEMBER 22, 2004
8:30 a.m. – 4:30 p.m.

AGENDA

8:30-9:00	Registration and Coffee
9:00-9:10	Welcome (Suzanne R. Varco, Opper & Varco LLP)
9:10-9:25	George McCandless and Mike Vernetti (DEH): DEH Agency Update and POP Update
9:25-9:40	John Odermatt (RWQCB): RWQCB Agency Update
9:40-10:10	Kevin Heaton (DEH): UST Upgrade History

Lessons Learned About Enhanced Leak Detection:

10:10-10:40	Marcelo Panelo (ARCO): ELD Pre and Post Testing: An Industry Perspective

10:40-10:55 Break

10:55-11:25	Kevin Heaton (DEH): DEH ELD Regulations
11:25-11:55	Erin Ragazzi (SWRCB): Enhanced Leak Detection: Where We Are to Date . . .

11:55-1:00 Lunch

Lessons Learned about Vapor Migration

1:00-1:15	Blayne Hartman (H&P Mobile Geochemistry): Vapor Migration - Local Agency Update
1:15-1:45	Todd Ririe (Unocal): Results of Vapor Pathway Investigation of Homes Over Petroleum Impacted Soils
1:45-2:00	Roy Thun (Atlantic Richfield Co.): Vapor Migration Technical Workgroup Update

Lessons Learned About Risked Based Closure/Natural Attenuation

2:00-2:30	Gary Beckett (AQUI-VER) and Julie Chan (RWQCB): "How Long Did You Say?" – Using Site Data to Estimate Realistic "Time to Reach Objectives" for Risk Based Closures
2:30-3:00	Robert Sweeney (Environmental and Petroleum Geochemistry): Case Study – Evaluation of Natural Attenuation Conceptual Site Model with Field Data

3:00-3:15 Break

3:15-3:45	Bill Linn (Florida Dept. of Env. Protection): The Past is the Key to the Present – Conducting Contamination Site Work at Dry Cleaning Sites
3:45-4:15	Daniel Leigh (Shaw Environmental): In Situ Anaerobic Bioremediation of a Former Dry Cleaner Site at Naval Station Treasure Island

SANITARY SEWER OVERFLOW STATISTICS (Updated through October 31, 2004)

SEWAGE COLLECTION AGENCY	SYSTEM SIZE[B]		NO. OF SEWAGE SPILLS [LISTED BY FISCAL YEAR (FY) - JULY 1 THROUGH JUNE 30]				SPILLS PER 100 MILES (LISTED BY FY)				SPILL VOLUME 2004-05[A]	
	Miles	MGD	01-02	02-03	03-04	04-05[A]	01-02	02-03	03-04	04-05[A]	GAL	GAL/MG[D]
ORANGE COUNTY:												
EL TORO WD	55	2.2	3	1	3	2	5.5	1.8	5.5	3.7	60	0.2
EMERALD BAY SERVICE DISTRICT	6	0.09	0	0	0	1	0.0	0.0	0.0	16.7	350	30.3
IRVINE RANCH WD	36	2.0	0	0	0	0	0.0	0.0	0.0	0.0	0	0.0
LAGUNA BEACH, CITY OF	95	2.4	10	27	8	4	10.5	28.4	8.4	4.2	2,320	8.0
MOULTON NIGUEL WD	530	13.0	2	1	2	0	0.4	0.2	0.4	0.0	0	0.0
SAN CLEMENTE, CITY OF	179	4.5	6	7	2	1	3.3	3.9	1.1	0.6	8	0.0
SAN JUAN CAPISTRANO, CITY OF	100	3.4	0	0	1	1	0.0	0.0	1.0	1.0	35	0.1
SANTA MARGARITA WD	546	10.7	12	4	5	2	2.2	0.7	0.9	0.4	950	0.7
SOUTH COAST CWD	132	4.0	5	8	7	1	3.8	6.1	5.3	0.8	20	0.0
TRABUCO CANYON WD	43	0.72	0	0	1	2	0.0	0.0	2.3	4.7	1,614	18.2
RIVERSIDE COUNTY:												
EASTERN MWD	421	9.5	1	3	7	0	0.2	0.7	1.7	0.0	0	0.0
ELSINORE VALLEY MWD	80	2.0	0	0	1	1	0.0	0.0	1.3	1.3	8,777	35.5
MURRIETA MWD	25	0.5	E	E	1	0	E	E	4.0	0.0	0	0.0
RANCHO CA WD	71	2.9	2	0	1	1	2.8	0.0	1.4	1.4	900	2.6
SAN DIEGO COUNTY:												
BUENA SANITARY DISTRICT	84	1.9	0	2	1	0	0.0	2.4	1.2	0.0	0	0.0
CARLSBAD MWD	214	7.2	15	6	6	2	7.0	2.8	2.8	0.9	117	0.1
CHULA VISTA, CITY OF	400	16.0	6	3	1	2	1.5	0.8	0.3	0.5	1,850	0.9
CORONADO, CITY OF	53	3.8	5	2	5	0	9.4	3.8	9.4	0.0	0	0.0
DEL MAR, CITY OF	30	1.1	2	7	1	0	6.7	23.4	3.3	0.0	0	0.0
EL CAJON, CITY OF	198	9.1	2	3	0	1	1.0	1.5	0.0	0.5	2,000	1.8
ENCINITAS, CITY OF	118	4.1	2	6	1	3	1.7	5.1	0.8	2.5	49,145	97.2
ESCONDIDO, CITY OF	350	10.8	14	3	2	0	4.0	0.9	0.6	0.0	0	0.0
FAIRBANKS RANCH COMM SERV DIST	15	0.21	0	0	0	0	0.0	0.0	0.0	0.0	0	0.0
FALLBROOK PUBLIC UTILITY DIST[C]	72	2.0	17	22	9	1	23.6	30.6	12.5	1.4	2,025	8.2
IMPERIAL BEACH, CITY OF	84	2.2	1	14	2	1	1.2	16.7	2.4	1.2	60	0.2
LA MESA, CITY OF	155	5.8	12	3	4	1	7.7	1.9	2.6	0.6	675	0.9
LEMON GROVE, CITY OF	69	2.4	9	4	4	2	13.0	5.8	5.8	2.9	48,000	161.5

ATTACHMENT B-1

SANITARY SEWER OVERFLOW STATISTICS (Updated through October 31, 2004)

SEWAGE COLLECTION AGENCY	SYSTEM SIZE[B]		NO. OF SEWAGE SPILLS [LISTED BY FISCAL YEAR (FY) - JULY 1 THROUGH JUNE 30]				SPILLS PER 100 MILES (LISTED BY FY)				SPILL VOLUME 2004-05[A]	
	Miles	MGD	01-02	02-03	03-04	04-05[A]	01-02	02-03	03-04	04-05[A]	GAL	GAL/MG[D]
SAN DIEGO COUNTY *(continued)*:												
LEUCADIA CWD	185	4.2	5	6	1	2	2.7	3.2	0.5	1.1	3,300	6.3
NATIONAL CITY, CITY OF	97	5.1	0	1	2	1	0.0	1.0	2.1	1.0	1,500	2.4
OCEANSIDE,CITY OF,WTR UTIL DEP	446	13.0	17	23	22	5	3.8	5.2	4.9	1.1	1,700	1.1
OLIVENHAIN MWD	16	0.39	1	2	0	2	6.3	12.5	0.0	12.5	825	17.1
OTAY MWD	86	1.4	0	3	1	0	0.0	3.5	1.2	0.0	0	0.0
PADRE DAM MWD	150	5.1	4	3	3	0	2.7	2.0	2.0	0.0	0	0.0
PAUMA VALLEY COMM SERVICE DIS	8	0.07	0	0	0	0	0.0	0.0	0.0	0.0	0	0.0
POWAY, CITY OF	170	4.0	1	5	3	0	0.6	2.9	1.8	0.0	0	0.0
RAINBOW MWD	54	0.74	2	2	6	1	3.7	3.7	11.1	1.8	100	1.1
RAMONA MWD	83	1.3	5	2	2	0	6.0	2.4	2.4	0.0	0	0.0
RANCHO SANTA FE COMM SERV DIST	52	0.44	1	1	0	1	1.9	1.9	0.0	1.9	670	12.4
SAN DIEGO CO, PUBLIC WORKS	380	11.0	4	11	2	0	1.1	2.9	0.5	0.0	0	0.0
SAN DIEGO, CITY OF, MWWD	2,894	170	226	193	115	39	7.8	6.7	4.0	1.3	39,386	1.9
SOLANA BEACH, CITY OF	52	1.2	2	1	6	0	3.8	1.9	11.5	0.0	0	0.0
USMC BASE, CAMP PENDLETON	194	3.1	18	23	14	2	9.3	11.9	7.2	1.0	3,350	8.9
US NAVY	123	4.0	24	12	11	7	19.5	9.8	9.0	5.7	3,945	8.0
VALLECITOS WD	202	6.1	4	5	4	2	2.0	2.5	2.0	1.0	270	0.4
VALLEY CENTER MWD	48	0.32	0	3	1	0	0.0	6.3	2.1	0.0	0	0.0
VISTA, CITY OF	198	6.5	4	4	7	1	2.0	2.0	3.5	0.5	100	0.1
WHISPERING PALMS COMM SERV DIS	17	0.26	1	1	0	0	5.8	5.8	0.0	0.0	0	0.0
REGION 9 TOTAL	9615	363	445	427	275	92					174,052	
AVERAGE [1]							4.6	4.4	2.9	1.0		9
STANDARD DEVIATION [2]							5.0	7.0	3.4	3.1		28
MEDIAN [3]							2.4	2.4	2.0	0.6		0

[A] Includes available preliminary data for Jul - Oct 2004 and may not include all spills less than 1,000 gallons that did not enter surface waters or storm drains during this period.

[B] As of June 2003.

[C] Does not include 11 SSOs in 2000-2001 which occurred from private property but are the reponsibility of the Fallbrook PUD according to its own existing policies at the time.

[D] Volume of spills for the period in gallons divided by the amount conveyed for the period in million gallons

[E] Included with Eastern Municipal Water District

[1] The average is the sum of all values divided by the number of values.

[2] In a normally distributed set of values, 68% of the values are within one standard deviation either above or below the average value.

[3] The median is the middle value in a set; half the values are above the median, and half are below the median.

10/5/04	Retail Development Advisors	Orchard Stone Creek Development Project	Development of a 54-acre site located in the City of Murrieta for a commercial retail shopping center.	Unnamed Intermittent Stream	Streambed (P) – 0.44	Relocate and reconstruct stream and create 2.8 acres w/riparian woodland, mulefat scrub, and herbaceous riparian vegetation.	Conditional
10/5/04	SCC/ Murrieta Valley LLC	Murrieta Valley Project	Construction of a residential development consisting of 259 single- family homes and associated infrastructure including 10.7 acres of parks and 8.6 acres of open spaces paseos-on a 98-acre parcel.	Unnamed Tributary To Warm Spring Creek	Streambed (P) – 0.056	Purchase of 1.0 acre of credit at the Barry Jones Mitigation Bank	Conditional
10/5/04	City of San Diego, Metropolitan Wastewater Dept.	60th Street Sewer Replacement Project	Relocate and or replace sections of the existing sewer line within the canyon.	Unnamed Intermittent Stream Channel	None	None	Withdrawn
10/6/04	San Diego Unified School District	Golden Hill Elementary	Removal of waste/soil from drainage.	Unnamed Tributary to Chollas Creek	Streambed (T) – 0.01	Onsite restoration of temporary impacts.	Low Impact
10/7/04	Saddleback Vineyards, LLC	Mountain Shadows	Investigation of geotechnical resources.	Unnamed Drainage to Aliso Creek	Streambed (T) – 0.002	Onsite restoration of temporary impacts.	Low Impact
10/26/04	City of San Diego	Chocolate Canyon Stream Restoration	Repair of a gully that may be linked to emergency sewer actions within Chocolate Canyon.	Unnamed Waters	Streambed (P) – 0.001	Onsite enhancement at a ration of 1:1.	Conditional

1. Wetland refers to vegetated waters of the U.S. and streambed refers to unvegetated waters of the U.S. (P) = permanent impacts. (T) = temporary impacts.
2. Low impact certification is issued to projects that have minimal potential to adversely impact water quality. Conditional certification is issued to projects that have the potential to adversely impact water quality, but by complying with technical conditions, will have minimal impacts. Denials are issued when the projects will adversely impact water quality and suitable mitigation measures are not proposed or possible. Time expired refers to projects that may proceed due to the lack of an action by the Regional Board within specified regulatory timelines. Withdrawn refers to projects that the applicant or Regional Board have withdrawn due to procedural problems that have not been corrected within one year.

California Regional Water Quality

ATTACHMENT B-4

San Diego Region

Terry Tamminen
Secretary for Environmental Protection

9174 Sky Park Court, Suite 100, San Diego, California 92123-4340
(858) 467-2952 • Fax (858) 571-6972
http://www.swrcb.ca.gov/rwqcb9

Arnold Schwarzenegg
Governor

October 29, 2004

In reply refer to:
WPS: 10-5000.02:hammp

Dear San Diego Municipal Storm Water Copermittee (Distribution List Attached):

Subject: Report of Waste Discharge for Re-issuance of the San Diego Municipal Storm Water Permit

The San Diego Regional Water Quality Control Board (Regional Board) has identified the information which it expects to be included in the Copermittees' Report of Waste Discharge (ROWD) for re-issuance of the San Diego Municipal Storm Water Permit (Permit). The collaborative process for Regional Board and Copermittee discussion on the contents and submittal of the ROWD has also been identified. These issues were discussed by the Regional Board and Copermittee representatives at a meeting on October 22, 2004. Information on the expected contents of the ROWD and the process for submittal of the ROWD is provided below.

Report of Waste Discharge Content

The Regional Board requests submittal of one ROWD which represents all of the Copermittees. Submittal of one ROWD is expected to be more efficient for both the Copermittees and the Regional Board. With one ROWD, Copermittees will not be responsible for submittal of individual ROWDs, which will reduce reporting efforts. A single ROWD will also be more coherent to the Regional Board during its review and consideration of the submittal. Moreover, if a Copermittee has individual issues not reflected in the ROWD, those issues can be addressed through the comment and response process which will occur following submittal of the ROWD and issuance of a draft Permit.

Regarding the content of the ROWD, the Regional Board intends to follow the guidance provided by the United States Environmental Protection Agency (USEPA) in its "Interpretive Policy Memorandum on Reapplication Requirements for Municipal Separate Storm Sewer Systems." According to the USEPA, the reapplication should not be as extensive as the initial application. The principal information which should be included in the reapplication is "any proposed changes or improvements to the storm water management program."

Therefore, the Regional Board expects the ROWD to be limited to a discussion of the Copermittees' proposed changes to their urban runoff management programs. A complete reiteration of the Copermittees' programs is not necessary. Discussion should focus on specific program changes the Copermittees are seeking to implement, rather than on changes to Permit language. The Copermittees' proposed program changes will be used to draft Permit language after receipt of the ROWD. For each proposed program change, the ROWD should include (1) a description of the proposed program change; (2) the rationale for the proposed program change,

including a description of how the change will improve water quality; and (3) a description of what steps will be taken to implement the proposed change. Program changes proposed in the ROWD should not seek to reduce the current level of activity being conducted by the Copermittees, but rather should increase the efficiency and effectiveness of activities being conducted.

In addition to proposed program changes, the ROWD is also an opportunity for the Copermittees to put forth proposals on how they would address some ongoing program deficiencies which have been identified by the Regional Board. The Regional Board has preliminarily identified areas of the Copermittees' programs and the Permit where improvement is necessary. The preliminary areas for improvement are listed below, though others may be identified during the ROWD development and submittal process.

1. Identification and implementation of best management practices (BMPs)/water quality activities which address the high priority water quality problems listed in the watershed urban runoff management plans (WURMPs) needs improvement and expansion.

2. Copermittee collaboration on WURMP development and implementation needs improvement and expansion.

3. Model Standard Urban Storm Water Mitigation Plan (SUSMP) requirements for control of "conditions of concern" and downstream erosion are unclear. Numeric criteria for the control of "conditions of concern" and downstream erosion need to be developed and implemented.

4. SUSMP selection and implementation of effective permanent treatment control BMPs needs improvement.

5. Methods to ensure maintenance of permanent treatment control BMPs, such as field verification, need to be developed and implemented.

6. SUSMP incorporation of low-impact design (LID)/site design components into projects needs improvement and expansion.

7. Prioritization and inspection frequencies for construction sites can be improved to better reflect construction sites' threat to water quality.

8. Requirements for phased grading during the wet season need to be developed and implemented.

9. Activities and BMPs to better address trash in municipal separate storm sewer systems (MS4s) and drainages need to be developed and implemented.

10. Prioritization and inspection frequencies for industrial and commercial sites can be improved to better reflect the sites' threat to water quality.

11. Follow-up procedures to dry weather field screening results need to be standardized.

12. Fiscal analysis information to be submitted in annual reports needs to be standardized.

13. Reporting periods and/or reporting due dates need to be changed to better coincide with one another.

14. Watershed-based monitoring strategies which investigate the sources of water quality problems within watersheds need to be developed and implemented.

Process for Report of Waste Discharge Development and Submittal

The Regional Board plans to conduct a series of meetings to discuss the content of the ROWD. Since the content of the ROWD is to include the Copermittees' proposed changes to their programs, the focus of the meetings will be to discuss both the Regional Board's and the Copermittees' proposed changes to the urban runoff management plans. The outcome of the meetings will be identification of areas of agreement and disagreement regarding proposed program changes. Follow-up efforts to resolve areas of disagreement can then be organized. The goal of the meetings is to resolve as many issues as possible prior to submittal of the ROWD. This will allow for the subsequent permit adoption process to focus on the resolution of any remaining issues.

Each meeting will discuss particular components of the Copermittees' programs. Top priority proposed changes to the program components will be discussed. The following is a tentative schedule of the meetings and their topics:

December 10, 2004 – Watershed Urban Runoff Management Plans.

February 2005 – Monitoring, Assessment, Reporting.

April 2005 – Municipal, Industrial and Commercial, Residential, Education.

June 2005 – New Development, Construction, ICID, Fiscal Analysis.

Following the meetings, the ROWD is due for submittal in August 2005. After receipt of the ROWD, the Regional Board will issue a draft Permit to the public for review and comment. An initial hearing for the Regional Board to consider adoption of the draft Permit is tentatively scheduled for February 2006. Within the review period of the draft Permit and prior to the initial hearing, the Regional Board may convene a workshop on the new requirements in the draft Permit.

I am very much encouraged by this proposed schedule toward the development of a new MS4 Permit. I am equally encouraged by the Copermittees' spirit of cooperation in developing an effective Permit.

The heading portion of this letter includes a Regional Board code number noted after "in Reply refer to:". In order to assist us in the processing of your correspondence please include this code number in the heading or subject line portion of all correspondence to the Regional Board pertaining to this matter.

Thank you for your continued efforts in the municipal storm water program. If you have any questions regarding this letter, please contact Phil Hammer at (858) 627-3988.

Respectfully,

John H. Robertus
Executive Officer
San Diego Regional Water Quality Control Board

Enclosures: 1. Distribution List

cc: 1. Bruce Fujimoto, SWRCB, Sacramento
2. Eugene Bromley, USEPA, San Francisco

Distribution List

Jayne Strommer, City of Carlsbad
Khosro Aminpour, City of Chula Vista
Scott Huth, City of Coronado
Miriam McKenna, City of Del Mar
Julie Hampel, City of El Cajon
Kathy Weldon, City of Encinitas
Cheryl Filar, City of Escondido
Maria Garcia, City of Imperial Beach
Hamed Hasemian, City of La Mesa
Bruce Charest, City of Lemon Grove
Din Daneshfar, City of National City
Mo Lahsaie, City of Oceanside
Danis Bechter, City of Poway
Karen Henry, City of San Diego
Jon Van Rhyn, County of San Diego
Richard Gilb, San Diego County Regional Airport Authority
Karen Helyer, Port of San Diego
Jasen Boyens, City of San Marcos
Erik Steenblock, City of Santee
Danny King, City of Solana Beach
Keri Martinez, City of Vista

A state study has found that the predominant source of bacteria in Mission Bay comes from droppings of birds, such as tern (above), that are less likely to cause human illness than bacteria in sewage. Historically, Mission Bay has experienced more beach postings and closures due to high bacteria than any other stretch of shoreline in San Diego County. *K.C. Alfred / Union-Tribune*

Water may be safer than thought

By Terry Rodgers
STAFF WRITER

Swimmers and boaters at Mission Bay, where bacteria contamination has been a chronic problem, may be safer than previously thought. Bird droppings — considered less harmful than other contaminants — are responsible for more than two-thirds of the bacteria that has triggered numerous mandatory health warnings, according to a two-year study.

Most of the bacteria that public health officials test for at Mission Bay originate from sources that are less likely to cause human illness than bacteria in sewage, the $1.3 million state-funded study found.

That the predominant source of bacteria comes from bird droppings "makes the risk probably less, but it does not reduce it to zero," said Richard M. Gersberg, a microbiologist and professor of environmental health at San Diego State University.

"Obviously, we can still get diseases from animals," he said.

Steven Weisberg, chief scientist for the Southern California Coastal Water Research Project, agreed that "bird droppings are certainly less harmful than human waste."

But Weisberg said parents need to ask themselves a question: "Would you put your child into a bath tub with bird droppings in it?"

A second study to evaluate the human health risk from swimming in Mission Bay is expected to be released in a few weeks. Those familiar with that research project say it supports the findings of the bacteria study and the implication that the waters are safer.

For the financially imperiled city of San Diego, the findings are good news because no costly infrastructure flaws, such as a leaky sewer system, were linked to the bay's bacteria problems.

From 1985 to 1996, the city spent more than $120 million to replace sewer pipes and pump stations around the bay. In the early 1990s, an additional $10 million was spent to install devices that funnel dry-weather urban runoff in dozens of

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Study's results won't affect health warnings

storm drains away from the bay, diverting it to the sewer system.

"It pains me to hear people talk about how bad Mission Bay is and how the water isn't fit to swim in because the science now shows it isn't so," said Karen Henry, deputy director of the city's storm-water pollution-prevention program.

"From a bacteria standpoint, it's not a widespread problem," she said. "This study shows it's isolated to a few specific areas."

The study by MEC Analytical Systems provides new insights into how bacteria is stored in fine sand and silts typical of bay-side beaches and how kelp and other algae serve as a medium for bacteria regrowth.

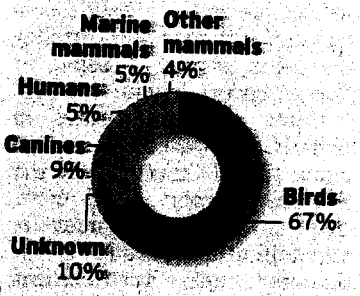
"These results should prove useful in solving water-quality problems at enclosed beaches along California's coast," said Mark Gold, a microbiologist and executive director of Heal the Bay, a Santa Monica-based environmental group.

The study challenges the common assumption that bacteria quickly die after being exposed to sunlight and saltwater. The scientists studying Mission Bay found that fine sediments and sands along the shore act as a reservoir for bacteria that can be resuspended in the water when stirred up by waders and swimmers. They also found that rotting kelp and eel grass deposited by the tides on the shoreline can produce a bumper crop of bacteria, enough to exceed state water-quality standards for human contact.

Mission Bay bacteria

DNA analysis of bacteria from Mission Bay found that more than two-thirds were from various species of birds.

SOURCES OF BACTERIA



SOURCE: MEC Analytical Systems

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Another surprising finding was that bacteria, mostly from bird droppings, has saturated the upper 18 inches of the grassy areas maintained by the city Parks and Recreation Department along the Mission Bay shoreline.

The city chose to conduct the study at Mission Bay because historically it has experienced more beach postings and closures due to high bacteria than any other stretch of shoreline in San Diego County.

In 2000, public health officials posted 1,480 high-bacteria warnings at various beaches along Mission Bay's 27 miles of shoreline. In 2001, the number of postings declined to 838. The sharpest decline occurred in 2002, when there were 496 postings. Last year there were 492.

The downward trend reflects the city's efforts to reduce sources of bacteria though better management practices, such as reducing urban runoff from over-watering of lawns and landscaping.

The study's findings won't make any difference in the posting of warnings because the state's water-quality standards don't take into account the sources of bacteria.

"You can't just dismiss it because it's from birds. It's more complicated than that," said Christopher Stevens, a state water-quality engineer.

Since 1988, Mission Bay has been listed by the state as an "impaired" water body because of chronically high bacteria.

Under state regulations, the city is responsible for reducing bacteria in recreational waters regardless of the source.

Potential sources of bacteria explored during the study but ruled out as contributors included boats moored in the bay, city restrooms and homeless people living in the canyons that drain into the bay.

Using high-tech DNA fingerprinting and other methods, the consultants examined bacteria found along the shoreline and in the water at 12 sites. They concluded that each ha a "unique set of potential ba teria sources" ranging from ro ting flotsam pushed by th tides into the mouths of storm drains to pet owners not pick ing up after their dogs.

Bacteria from dog dropping accounted for 9 percent of th bacteria found in the bay du ing the testing period.

The study concludes that th small amount of bacteria fron human origin — less than percent — probably originate from swimmers and bather themselves rather than an out side source such as leaking sewer lines.

Terry Rodgers: (619) 542-4566; terry.rodgers@uniontrib.com

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Water at S.D. park is found to be safe

Study says beaches at Mission Bay OK

By Terry Rodgers
STAFF WRITER

Despite a history of high bacteria readings, the 27 miles of beaches along Mission Bay Park are safe for all forms of aquatic recreation, including swimming.

That's the conclusion of a two-year, $1.5 million epidemiological study that examined the health risks of beachgoers who visited the 4,235-acre park in summer 2003.

"I have four kids and a wife, and I'd be comfortable with them swimming there," said Dr. Jack Colford, who headed the study.

The study offers the best proof so far that the 14 million annual visitors to Mission Bay are unlikely to get sick from the water, even when bacteria readings exceed state standards.

Colford, a physician and research professor from the University of California Berkeley, announced his findings Thursday at the National Beaches Conference in San Diego.

Aside from the low health risk to swimmers, the study produced another intriguing finding: Researchers discov-

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Study was one of few done at an enclosed bay

ered no link between the illnesses contracted by beachgoers and the types of bacteria public health officials test for and cite when posting beaches for contamination.

In other words, testing recreational waters for the presence of fecal coliform, E. coli and enterococcus bacteria — the traditional method used nationwide for decades — may not be a reliable indicator of whether water is safe for recreation.

"This may prompt scientists to look for other rapid and reliable (pollution) indicators in waters where people are likely to contract illness," Colford said.

The study will be closely examined by regulatory agencies such as the Environmental Protection Agency because it calls into question whether public health officials need to be concerned about beaches where the source of bacteria is birds or marine mammals rather than pathogens from human sewage.

The study involved 8,790 beachgoers who were interviewed about how much contact they had with the water, from full immersion to no body contact at all. Ten days to two weeks later, the participants were asked if they had contracted any illnesses. The water was tested several times each day. About 17 percent of the water samples exceeded state standards for bacteria.

Among beachgoers who didn't go in the water, 3.8 percent came down with minor illnesses ranging from diarrhea to skin rashes. Among those who did go in, 4.7 percent reported getting such illnesses. While the overall illness rate was low, the study found a slightly elevated risk among beachgoers younger than 30 for diarrhea. Those younger than 12 had a slightly higher risk for skin rashes.

The survey supports the findings of a recent bacteria-source-identification study at Mission Bay. That research concluded that high bacteria readings were being caused by bird droppings rather than more virulent microbes, such as those in human sewage.

Mark Gold, chief scientist for Heal the Bay, a Santa Monica environmental group, said the Mission Bay health-risk study is important because it's one of the few to be done at an enclosed bay, "which are the hardest beaches to clean up."

The study also was conducted at a recreational area where the source of high bacteria was initially unknown.

As recently as the mid-1980s, sewage overflows and pollution from storm drains flowing into Mission Bay were a chronic problem. Since then, the city has spent more than $130 million to upgrade its sewer and storm drain system to reduce bacteria.

Scott Tulloch, director of San Diego's municipal sewer system, said he was encouraged by the findings, but added, "This doesn't mean we should stop our focus on fixing our infrastructure and doing all we can to reduce sewage spills."

Terry Rodgers: (619) 542-4566; terry.rodgers@uniontrib.com