

# FORMAL DRAFT MONITORING REQUIREMENTS

Municipal Stormwater NPDES Permits  
Phase I and W WA Phase II  
Bill Moore (Ecology) October 19, 2011

# YOU ARE HERE

- Today Ecology is releasing formal draft permit language, a revised draft cost-sharing agreement. S8 monitoring language has changed from the May preliminary draft.
- Comment period is today through February 3
  - 6 permits
    - This talk is focused on the permits with PS monitoring
- Ecology will compile a formal response to comments on the formal drafts and plans to issue final permits in July 2012

# SWG RECOMMENDATIONS

- Ecology should require all permittees to pay in for monitoring (except for effectiveness studies)
  - Ecology did not include opt-out in the May preliminary draft, asked for feedback
- Established level of effort and estimated costs (except for effectiveness studies)
  - Ecology accepted local gov't caucus proposal
- Ecology should use contracting arrangements to satisfy permit requirements
  - Ecology proposed a cost-share agreement and acknowledged SWG oversight proposal

# ECOLOGY DECISIONS

- New individual monitoring requirements for permittees who choose to opt out of RSMP
  - All permittees must notify Ecology which options they choose to implement
  - New requirements are designed to contribute meaningful information to the RSMP

# ECOLOGY DECISIONS

- **Status and trends opt-out requirement:**
  - Monitor sites on the master sample list that are located inside the permittee's jurisdictional boundaries
    - Different numbers of sites for different size jurisdictions
    - Includes streams and nearshore
- **Source ID opt-out requirement:**
  - Submit detailed quarterly reports on IDDE activities

# ECOLOGY DECISIONS

## ○ Effectiveness studies

- Level of effort: same total amount as preliminary draft
- Opting out: new draft language provides two options for Phase II, three options for Phase I
  - Contribute RSMP cost share, or
  - Conduct stormwater discharge monitoring according to new Appendix 9 specifications, or
  - Phase I only: pay half the RSMP share and conduct an Ecology-approved study

# ECOLOGY DECISIONS

- Cost allocations based on population only
  - Changed (reduced) Phase II county populations
    - Better approximation of the populations in their permit coverage areas
  - Changed (reduced) port “populations”
    - Informed by ports’ suggestion to use seaport area times adjacent population density

# ECOLOGY DECISIONS

- Permittees have the same cost share amount for each of years 2-5 of the permit
  - Costs are separated out for each monitoring component
  - Total ramp-up and implementation costs are spread across the 4 years

# COSTS

- Updated cost estimates that were used in the May preliminary draft
  - Reduced start-up costs
    - Tasks being completed with other funding sources: Wadeable streams QAPP, two literature reviews, stream gauging analysis
    - Tasks that have begun with other funding sources: Mussel Watch QAPP, sediment chemistry QAPP
  - Added a line item for Ecology's cost to administer the program (about 5% of RSMP)
  - New estimates for database management

# COSTS

- With SWG subgroups' input, decided:
  - Stream S&T monitoring
    - Reduced sampling effort: WQI once/5 years and benthos & habitat biannually at 100 sites; 20 annual “sentinel” sites
  - Nearshore S&T monitoring
    - Reduced sampling effort: only one round of mussels and bacteria
    - Reduced parameters: Maintain focus on sediment chemistry (not toxicity or biota for triad) and focus on metals and PAHs

# PHASE I

- Monitoring studies in S8.D, S8.E, S8.F in current permit must be completed
  - Preliminary draft language now in 1-year permit:
    - Three complete water years for discharge monitoring
    - Meet QAPP objectives and statistical goals
  - Additional language not in preliminary draft:
    - Enter all relevant data into EIM, International SW BMP database
- Small contribution in 5-yr permit year 1
  - No change from preliminary draft
  - \$100K collectively to advance ramp-up tasks

# BOILERPLATE AGREEMENT

- Cost-sharing agreement between Permittees and Ecology
  - Minor changes from preliminary draft version
    - Multi-party funding agreement with cost shares defined in the permits
  - Three attachments:
    - Scope of work: More detailed description of what agreement covers, what work will be done, how much it will cost (high-level budget breakdown, including a line item for program administration)
    - Maps of stream S&T sites
    - List of SWG-recommended effectiveness study topics

# SOUTHWEST WASHINGTON

- W WA program for:
  - Regional effectiveness studies
  - Source identification information repository
- No receiving water monitoring
  - Possible participation in Columbia River salmon recovery monitoring program development during this permit term
- Clark County to continue outfall monitoring

# OTHER MONITORING

- Permittees are still required to sample as necessary to:
  - Identify illicit discharges
  - Comply with applicable TMDLs

QUESTIONS?