

**ATTACHMENT 1 to 8-19-05 Bellevue Comment Letter re Prelim Draft NPDES Phase II Permit
PROPOSED AWC NPDES PHASE II MONITORING CONDITION**

Fact Sheet Background for Proposed AWC Monitoring Condition

The components of a small NPDES Phase II municipal Stormwater Management Program (Program) and the Total Daily Maximum Load-required water quality clean-up plans are mandated by the U.S. Environmental Protection Agency and Ecology. The intent of the Program Components and TMDLs is to reduce the discharge of pollutants from regulated small municipal separate storm sewer systems (MS4s) to the maximum extent practicable (MEP) and to protect water quality. The goals of this monitoring plan are to ensure this intent is being achieved by permittees through:

- ◆ Compliance Monitoring – document implementation of Program Components and TMDLs;
- ◆ Effectiveness Monitoring – document and demonstrate effectiveness of the Program Components and TMDL-required clean-up plans; and
- ◆ Adaptive Management Process- provide a feedback loop to continually improve effectiveness of Program Components and TMDL-required water quality clean-up plans.

Permit Condition S6 Small MS4s Environmental Results Monitoring

Compliance Monitoring

- i. In the annual report (beginning in the year 2007), document implementation of the Stormwater Management Program Components (per the Permit implementation schedule) and EPA-approved TMDLs.

Effectiveness Monitoring and Adaptive Management Process

- ii. Within (*X years*) of permit issuance, identify an evaluation measure to be monitored for each Program Component. If water quality monitoring is a specific requirement of an EPA-approved TMDL listed in the Permit, develop a TMDL monitoring Quality Assurance Project Plan (QAPP).

The evaluation measures and monitoring required under an EPA-approved TMDL will document environmental effectiveness of the Program and water quality clean-up plan. The Phase II permittees will use the data to adaptively manage the Program and TMDL-water quality clean-up plans to improve their effectiveness.

The evaluation measure that the permittee identifies for each Program Component is in addition to those already identified by Ecology in the preliminary draft permit.

Examples of potential evaluation measures, along with evaluation measures already identified by Ecology for Program Components, are provided in Attachment A.

- iii. Within (*X years*) of permit issuance, a technical peer review team of Phase II stormwater professionals, representative from Ecology, and an independent stormwater professional will be created. Phase II permittees will submit evaluation measures (and how they plan to implement them) to the team for technical peer review and recommendations.
- iv. Within (*X years*) of permit issuance, municipalities will consider the technical peer review team recommendations, incorporate recommendations as appropriate and finalize evaluation measures in a NPDES Phase II Monitoring Plan. The Plan will be submitted to Ecology with the (*X year*) annual report.
- v. Upon Ecology-approval of the monitoring plan, the Phase II permittee will begin monitoring the evaluation measures, documenting the results, and demonstrating how they have used them to adaptively manage their Program and Water Quality Clean-up Plans.