

Overview of Municipal and Industrial Storm Water Permits

County Schools Facilities Consortium (CSFC)

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Sheraton Grand Hotel, Sacramento

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Governance Structure

- * State Water Resources Control Board (SWRCB)
- * Nine Regional Water Quality Control Boards (RWQCB)

Three Permits

- * Municipal Permit
- * Industrial Permit
- * Construction Permit
- * Reissued every five years

Schools and Storm Water Permits

- * Schools become regulated under water permits in 2002
- * MS4 Five-Year reissuance
- * Primary concern: Cost

Key Organizations

- * California Stormwater Quality Association (CASQA)
- * Workable Approach to Environmental Regulation (WATER)
- * Statewide Stormwater Coalition (SSC)

Municipal Permit: Why Do Schools Care?

- * As introduced would apply to all schools in California
- * Schools considered “Non-Traditional” Small MS4 permittees

Municipal Permit: Cost Implications

- * Estimated cost of \$5,000 to \$10,000 per school site
- * Estimated cost of \$30,000 to \$50,000 for centralized district activities
- * Does not include cost of water quality mitigation measures such as water storage, filtration or other methods of improving water quality

Municipal Permit: Education Community Pushback

- * C.A.S.H. Storm Water Committee works with SWRCB staff before Permit is released
- * Public comment period closes September 8, 2011
- * Next draft will be released to the public by December 2011
- * Final adoption hearing in early 2012

Municipal Permit: Good News

- * Schools not automatically designated under current draft permit
- * Regional Boards retain authority to designate schools on a case-by-case basis
- * “Not Automatically Designated” not the same as “Exempt”
- * No other regulated sector received similar treatment

Municipal Permit: County Offices of Education

- * “Schools and charter schools” included in non-designation language...
- * ...*but county offices of education were not specifically included*
- * We believe that this is a technical oversight
- * C.A.S.H. and others request inclusion of COE’s in non-designation provision

Municipal Permit: Schools Likely to be Designated in Next Permit Reissuance

- * Outreach to districts
- * Develop cost information data
- * Monitor Regional Board activity
- * Implementation approach designed for city or county agencies
- * School-Specific permit?

Industrial Permit: Why do Schools Care?

- * Affects schools that operate school bus maintenance yards
- * Includes fueling and related equipment cleaning
- * Estimated to affect approximately 220 schools
- * Estimated costs of \$30,000 to \$100,000 per bus maintenance yard
- * Estimated cost assumes no Corrective Action Triggers are met or exceeded

Industrial Permit: Current Requirements

- * Best Management Practices (BMP)
- * List responsible personnel
- * Eliminate non-storm water discharges
- * Perform visual observations
- * Collect storm water samples
- * Perform Annual Comprehensive Site Compliance Evaluations
- * Submit Annual Reports

Industrial Permit: What's in the Revised Draft Permit?

- * Overview: More prescriptive and costly to implement
- * Numeric Action Levels (NALs) leading to Corrective Action Levels (Three Tiers)
- * Numeric Effluent Limits (NELs) for repeated NAL violations (potential for mandatory penalties)
- * Electronic filing of required reports
- * Minimum training requirements and certifications (QSD/QSP)

Industrial Permit: Additional Sampling and Analytical Requirements

- * Group Monitoring option eliminated
- * Field measurements for pH and Electrical conductivity (requires on-site meters)
- * Increase sampling frequency – dependent on compliance with NALs and NELs (minimum quarterly and up to every eligible storm event)
- * On-site rain gages

Industrial Permit: Education Community Pushback

- * C.A.S.H. Storm Water Committee
- * C.A.S.H. public comment letter
- * Education community testimony

Industrial Permit: Final Adoption Timeline

- * Initial draft of revised Industrial Permit issued on January 31, 2011
- * Public comment period closed on April 18, 2011
- * Second revision of Industrial Permit expected in September 2011
- * Final adoption of Industrial Permit expected in early 2012

Industrial Permit: Current Activities

- * WATER Coalition
- * Meeting with Governor's Office
- * Senate Select Committee on California Job Creation and Retention

Contact Information

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