

E-mail to Stormwater Quality Task Force Executive Committee

January 6, 1999

To: Melinda Marks and Task Force Executive Committee Members

Subject: Future Activities of the Stormwater Science Work Group

Recently I sent a report of the Stormwater Science Work Group activities covering March through December, 1998. In that report I listed a number of areas that the Work Group could undertake during 1999. In order to help focus attention on these issues as I perceive them, they are listed below.

Develop Guidance on How the BMP Ratcheting Down Process to Ultimately Achieve Appropriate Water Quality Standards Should Be Implemented

The objective of this goal would be to develop a Task Force consensus document on how NPDES permitted stormwater runoff water quality management agencies, regulatory agencies, environmental groups, and the public can work together to implement the BMP ratcheting down process to ultimately achieve NPDES stormwater runoff that does not cause or significantly contribute to violations of appropriate water quality standards.

In connection with the Stormwater Runoff Water Quality Impact Evaluation and Management Short Course that Scott Taylor and I presented in Orange County in mid-November, I developed an outline of the steps that I feel need to be taken to implement the BMP ratcheting down process. In a separate e-mail I am sending a copy of the slides that I used in my presentation. They provide a summary of my current thinking on how the BMP ratcheting down process should be implemented. This will help the Task Force Executive Committee understand the nature of the guidance that I can help the Work Group and Task Force develop.

Develop a Report on Estimated Costs for Achieving Water Quality Standards

Last July the Task Force Executive Committee indicated that it wished to develop a report covering potential water quality standards compliance issues and the cost of achieving compliance. At the September meeting these two components of the report were separated, where it was indicated that the cost of achieving compliance would be addressed in a subsequent report. The Stormwater Science Work Group could continue this effort, where Mack Walker, Scott Taylor and I would work with municipal dischargers to develop an estimate of the cost of compliance with water quality standards of the type that are currently being used to regulate urban area and highway stormwater runoff.

Guidance on Stormwater Runoff Water Quality Monitoring Programs

The Stormwater Science Work Group could develop guidance on stormwater runoff water quality monitoring programs that could become a Task Force recommended approach. This guidance would focus on receiving water water quality impact evaluation, as well as address the water quality significance of exceedance of a water quality standard. This type of program would become one of the key components of a proper BMP ratcheting down process. Information on my thoughts on this issue are summarized in my Short Course slides that will be sent in the near future, as well as my publications on Evaluation Monitoring.

In addition to developing a guidance document on how stormwater runoff water quality monitoring should be conducted, a technical session could be presented at one of the future Task Force meetings devoted to a review of existing municipal stormwater monitoring programs relative to their ability to provide the information needed to properly implement the BMP ratcheting down process.

Guidance on Evaluating Contaminated Sediment Water Quality Impact Issues

The Stormwater Science Work Group can develop guidance that can be used by stormwater management agencies, regulatory agencies and others for reliably evaluating the water quality significance of chemical constituents in aquatic sediments that contain particulate-associated constituents derived from urban area and highway stormwater runoff. The purpose of this guidance would be to demonstrate that the chemically based approaches that are beginning to be used to develop sediment quality guidelines do not provide a reliable base for assessing the water quality significance of chemical constituents in aquatic sediments. The consensus report would provide detailed guidance on US EPA/US Army Corps of Engineers biological effects based approaches for assessing the water quality significance of chemical constituents in aquatic sediments.

303(d) Listings and TMDLs

The Stormwater Science Work Group can develop a report that would provide guidance to stormwater management agencies, regulatory agencies and others on how stormwater runoff associated constituents should be incorporated into a 303(d) listing of an impaired waterbody. This guidance would also discuss how TMDLs should be applied to urban area and highway stormwater runoff.

This effort would be coordinated with R. Watson's Watershed Work Group activities.

BMP Selection and Efficacy Evaluation

The Stormwater Science Work Group can develop guidance on how to properly select a

stormwater runoff water quality BMP that would address a particular water quality problem. This guidance would also provide information on how to evaluate the efficacy of stormwater runoff water quality BMPs for existing discharges in enhancing receiving water beneficial uses, as well as for new discharges in protection of existing beneficial uses. This guidance would specifically discuss why the conventional BMP across the unit percent removal approach is a technically invalid approach for assessing the efficacy of BMPs for managing water quality impacts.

This effort would be coordinated with Scott Taylor's BMP Work Group activities and could be a key part of the revised BMP manual.

Suggested Approach

It is recommended that the Task Force Executive Committee briefly review each of the possible Stormwater Science Work Group 1999 activities, as well as any others that the Executive Committee finds should be considered. It is suggested that the Task Force Executive Committee refine the goals and products and prioritize these activities.

Questions on these possible activities should be directed to me by e-mail or phone, and can be addressed at tomorrow's Task Force Executive Committee meeting.

Fred