

San Diego Stormwater Copermittees Dry Weather Monitoring Workgroup

April 19, 2006 Meeting Summary

1. Introductions/Updates

Attendees

Name	Organization
Cofe, Jamey	EnviroMatrix Analytical, Inc.
Dadkhah, Arsalan	D-Max Engineering
Erickson, Jessica	City of San Diego
Fontanoz, Marisa	San Diego County Regional Airport Authority
Giangiordano, Michael	EnviroMatrix Analytical, Inc.
Gilb, Richard	San Diego County Regional Airport Authority
Hartman, Paul	City of Encinitas
He, Li-Ming	County of San Diego, Watershed Protection Program
Lahsaie, Mo	City of Oceanside
Long, Cora	City of Lemon Grove
Phillips, John	City of El Cajon
Renfrew, David	Weston Solutions
Sonksen, Andre	City of San Diego
White, Michelle	Port of San Diego

2. Review of the 2006 Tentative Permit

The Workgroup discussed issues related to dry weather monitoring program specified in the Tentative Permit No. R9-2006-0011. Provided in Appendix are comments proposed by and agreed within the Workgroup at the meeting. These comments are summarized into four categories: Consistency with 40 CFR part 136, Colilert and Enterolert as alternative methods for bacterial measurement, measurement of dissolved copper, and compliance with SWAMP QAMP. Regarding a quality assurance program, John Phillips indicated that it is desirable by the State Board/Regional Board for all monitoring programs to comply with SWAMP procedures including quality assurance and data management, which is supported by US EPA.

3. 2005 Monitoring Data Preparation and Submittal

The workgroup appreciates Copermittees' effort and cooperation in submitting monitoring data. We have received the 2005 dry weather monitoring data from 13 of the 21 Copermittees. For those who have not

submitted their data yet, please be advised to complete your submittal at your earliest convenience because without your data complete data analyses cannot be conducted for the region.

4. 2006 Dry Weather Monitoring

Copermittees' dry weather monitoring in 2006 shall be conducted in accordance with procedures described in the Permit 2001-01. Attached for your use are the Workgroup-adopted field datasheet, land use types, reporting limits, action levels for 2006 dry weather monitoring.

5. Next Meeting

Next Workgroup meeting is scheduled on June 21, Wednesday, 2006 from 10 am to noon, with location TBD.

Comments on Dry Weather Field Screening and Analytical Monitoring in the Tentative Permit No. R9-2006-0011
 Recommended by the Dry Weather Monitoring Workgroup (April 19, 2006)

Page Number/Section	Current Text	Comment	Recommended Change	Possible Watershed cost
p.12/ Section II.D.3.	Each Copermittee shall develop and/or update written procedures for dry weather field screening and analytical monitoring (consistent with 40 CFR part 136), including field observations, monitoring, and analyses to be conducted.	Use of field test kits for field screening monitoring is not approved by 40 CFR part 136. Modify the text such that it is clear that only analytical monitoring shall be consistent with 40 CFR part 136.	Each Copermittee shall develop and/or update written procedures for dry weather field screening monitoring and analytical monitoring (consistent with 40 CFR part 136) ¹ , including field observations, monitoring, and analyses to be conducted. Add a footnote: ¹ 40 CFR part 136 applies to analytical monitoring only, but does not apply to field screening monitoring.	Juris.
p.12, Section II.D.3.c.	(a) Total Hardness (3) Oil and Grease (4) Diazinon and Chlorpyrifos (5) Cadmium (Dissolved) (6) Lead (Dissolved) (7) Zinc (Dissolved) (8) Enterococcus bacteria (9) Total Coliform bacteria ¹ (10) Fecal Coliform bacteria ¹	In the ROWD Copermittees requested the option to analyze indicator bacteria using Colilert and Enterolert. On page 101 of the fact sheet, RWQCB granted the request. However, the footnote was not inserted on page 12 of the Tentative Permit. The constituents in the list were incorrectly numbered.	1) Total Hardness 2) Oil and Grease 3) Diazinon and Chlorpyrifos 4) Cadmium (Dissolved) 5) Lead (Dissolved) 6) Zinc (Dissolved) 7) Enterococcus bacteria ¹ 8) Total Coliform bacteria ¹ 9) Fecal Coliform bacteria	Juris.

			<p>¹ Colilert and Enterolert may be used as alternative methods. Fecal coliform is determined by calculation.</p>	
<p><u>p. 12</u> <u>Section</u> <u>II.D.3.d</u></p>	<ul style="list-style-type: none"> (a) Specific conductance (calculate estimated Total Dissolved Solids) (b) Turbidity (c) pH (d) Reactive Phosphorous (e) Nitrate Nitrogen (f) Ammonia Nitrogen (g) Copper (dissolved) (h) Surfactants (MBAS) 	<p>In the ROWD Copermittees requested the flexibility to conduct dissolved copper as a field screening parameter or to be submitted to an analytical laboratory (previous Permit required analytical laboratory analysis of dissolved copper).</p> <p>The test kit for dissolved Cu screening has a minimum reading of 0.1 mg/L (100 µg/L) as Cu²⁺, and action levels of dissolved copper range from 3.6 µg/L to 50 µg/L, depending on water hardness. This implies that the detection limit would be higher than action levels if the field test kit was used for measuring dissolved copper in the field. This indicates that test kits for dissolved copper do not meet the CTR objectives.</p> <p>Reactive Phosphorous [SIC] is exchangeable with orthophosphate-P that is more generally used in water quality field. A footnote shall be added to indicate this.</p>	<p>Recommend that Copper (dissolved) be removed from the list of field screening constituents in the section II.D.3.C, and be added to the list of analytical laboratory monitoring constituents in the section D.3.c.</p> <p>(d) Reactive Phosphorus¹</p> <p>¹ Exchangeable with orthophosphate-P</p>	<p>Juris.</p>

<p>p.13, Section II.E.1</p>	<p>Where procedures are not otherwise specified in this Receiving Waters Monitoring and Reporting Program, sampling, analysis and quality assurance/quality control must be conducted in accordance with the Quality Assurance Management Plan (QAMP) for the State of California's Surface Water Ambient Monitoring Program (SWAMP), adopted by the State Water Resources Control Board (SWRCB).</p>	<p>Since the Tentative Permit specifies procedures for dry weather monitoring as described in II.D.3, the Dry Weather Monitoring Program is exempt from the requirements of the SWAMP QAMP.</p>		<p>Juris.</p>
-------------------------------------	---	---	--	---------------