

True Source Control for TMDL Compliance - How to Achieve Compliance, Save Billions in Treatment Costs, and Be a Hero

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Abstract

Brief session introduction.

California 303(d) List - The Tsunami of TMDLs and How True Source Control Could Help

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Abstract

This year, the State Water Board added approximately 1,200 new pollutant/waterways to the list of impaired waterways. This represents an increase of 57% over the 2006 list. The number of new listings implies degradation of California waterways; however, the Board notice states that the new listings “do not necessarily reflect further degradation of water quality ... but are more likely due to the availability of more data.” Even as water quality improves, the trend of exponentially increasing listings will likely continue as more data is collected through the Surface Water Ambient Monitoring Program (SWAMP) and permittee monitoring efforts.

CASQA has commented that the Board should examine statewide impact of these listings as well as the overall feasibility of stormwater and wastewater agencies being able to fund and manage all the resultant TMDLs. However, we do not expect the Board to change direction in the near future and MS4s will face a major problem of decreasing funds and limited tools in trying to comply with an increasing burden of wasteload allocations. True source control can eliminate many of the TMDL pollutants before they get into storm sewer systems and thus provides the most feasible approach of implementing many TMDLs. For example, SB 346 could provide substantial help in addressing the 78 waterways listed for copper. Similarly, the Green Chemistry initiative could help reduce zinc loadings (38 listings), lead (18) and sediment toxicity (81).