

CASQA PHASE II Subcommittee Meeting Summary

Wednesday, October 20, 2021

Meeting Overview

Traditional Phase II General Permit Reissuance meeting between CASQA representatives and State Water Board staff on September 16, 2021 to discuss staff language for the proposed trash provisions of the Phase II Permit.

Summary and next steps

- Trash language in the recently adopted Caltrans permit influenced the current draft Phase II language.
- Permit Reissuance Schedule – Administrative draft anticipated in late spring 2022
 - Complete revision of the TMDL section is causing the delay
 - Water Board staff is willing to meet with CASQA as they finish up sections of the permit, but they are unlikely to release draft language
- Water Board staff are proposing to bring schools into the permit. They are considering and seeking input on thresholds for schools.

Proposed trash Capture requirements

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- H1 and H2 are legal language
- H3 Combines Traditional and Non-Traditional provisions so there is one set of provisions for both
 - H.3.1 – There were some challenges in combining the discussion, but it seemed more efficient to have one section
 - Changing Tracks
 - Upload to SMARTS; email staff; need to comply with new track

- H3.2/3.3 – Trash Generating Area (TGA) language is applied to both Traditional and Non-Traditional Phase II permittees.
 - Priority Land Use (PLU) terminology doesn't fit Non-Traditionals, and Traditionals may have a blend of PLUs and TGAs. For most Traditionals TGAs = PLUs.
 - Track 2 must use BASMAA OVTA (on-land visual trash assessment) or equivalent. Equivalent procedures must be approved by the Regional Board
 - Very High (VH), High (H), Moderate (M), and Low (L) generation rates. Board Legal has determined that VH, H, and M are “significant trash generation areas”
 - Track 1 Traditionals can substitute areas and remain in Track 1. Proposals for substitution must be sent to Regional Water Board for approval. Substitutions are allowed if an area generates the same or more trash.
 - Maps that will be submitted are different than those submitted for the 13383 Order. The new maps must show:
 - Devices that have been installed
 - Devices that will be installed in the next 12 months
 - Areas where other BMPs are being and will be implemented
- H.3.4 discusses an annual plan and how it relates to metrics.
 - Lay out the plan for the next year and what was achieved and what will be done to catch up if the permittee is off target on the metrics. (Water Board approval of this plan is not required.)
 - The implementation plan requires actionable implementation steps.
 - The plan must be updated, but other than the initial submittal, it is not resubmitted. (CASQA representatives are not sure about this.)
 - Plans will promote coordination between Caltrans and Permittees regarding mutually impacted areas.
- H.3.5 is basically the same certification process that is currently in place with modifications to address hydraulic capacity.
 - Full capture systems (FCS) must be sized to maintain hydraulic capacity when 50% filled with trash (and must be maintained before they are 50% full).
 - Multi benefit BMPs must be maintained to retain hydraulic capacity.
 - Permittees can develop their own FCS for certification.
- H.3.6 mirrors trash provisions with some nuances for Non-Traditionals
 - Annual trash assessments for location where trash BMPs have been assessed or select a statistically representative number of locations.

- H.3.7 – MILESTONES
 - Influenced by Caltrans. The metric is “treated acres.”
 - 1st Milestone 35% of the significant TGAs treated by 12/2/2025
 - 2nd Milestone 70% of the significant TGAs treated by 12/2/2028
 - 100% compliance of the significant TGAs treated by 12/2/2030
 - Permittees may submit alternate milestones which must be approved by the Regional Water Board
- H.3.8 – Maintenance
 - Deceives must be maintained before they are 50% full.
 - FCS must be maintained at least annually.
 - VH and H must be maintained at least 2X per year.
 - If inspection shows FCS at >50% full, maintenance frequency must increase.
 - Specifies records that must be kept, e.g., installation date and maintenance date.
- H.4 – Same as Trash Provisions
- H.5 – Annual monitoring report
 - Permittees report implementation actions taken and what is planned for next year.
 - Track 2 must assess the reduction in trash.
- H.5.2 – Select/reselect compliance track
 - 60-day reselection of compliance track.
 - 180-day submittals – H.3.2, 3.3, and 3.4