

State Water Board Staff Discussion With CASQA Representatives on the Preliminary Trash Provisions Implementation Requirements in the Small MS4 Permit

State Water Board Staff Item	Applicable to Track 1 or 2 (as Indicated in Trash Amendments)	Applicable Topic/Category	Topic for Discussion
Merged Traditional and non-Traditional requirements into single document.	Both	Overall	
By December 2, 2030, Permittees shall demonstrate full compliance with the trash implementation requirements.	Both	Milestones/Overall Goal	
Permit provides two Interim Trash Reduction Milestones (35% by 12/2/26 and 70% by 12/2/2028).	Both	Milestones/Overall Goal	X
New Permittees shall select via SMARTS a Compliance Track within 60 days of the Effective Date of the Permit. Existing Permittees shall implement their previously selected Track selection.	Both	Track Selection/Implementation	X
Provides requirements for Permittees changing compliance track selection during the permit term.	Both. Requirements would differ depending on switch.	Track Selection/Implementation	T
Within 180 days of the Effective Date of the Permit or new enrollment, the Permittees shall prepare, and annually update, a Trash Generation Inventory based upon trash assessment.	Track 2	Track Selection/Implementation	X
Provides conditions for Traditional Permittees selecting Compliance Track 1 to request authorization from the Regional Water Board Executive Officer to substitute one or more Priority Land Uses for other land uses.	Track 1	Track Selection/Implementation	
Within 180 days of the Effective Date of the Permit or new enrollment, Permittees shall prepare, annually update, and submit via SMARTS, a Trash Generation Map.	Track 2	Track Selection/Implementation	X
Within 180 days of the Effective Date of the Permit or new enrollment, Permittees shall prepare, and annually update, a Trash Implementation Plan.	Track 2	Track Selection/Implementation	X
Permittees shall coordinate activities with the Department of Transportation to install, operate, and maintain Certified Full Capture Systems, Other Treatment Controls, and/or Institutional Controls in mutually impacted areas.	Both	Track Selection/Implementation	X
Permittees must include in their Trash Generation Inventory any Regional Water Board Executive Officer determined specific land uses or locations that generate substantial amounts of trash.	Both?	Track Selection/Implementation	X
The Permittees shall perform trash assessments implementing either the Visual Trash Assessment Approach or equivalent spatially explicit approach.	Track 2	Demonstration of Milestones/Goal Achievement	
Certified Full Capture Systems shall be sized and designed to maintain hydraulic capacity to trap trash for peak flow rates when 50 percent filled with trash and other debris.	Track 1 and as applicable to Track 2	Demonstration of Milestones/Goal Achievement	X
Permittees shall inspect and/or maintain Certified Full Capture Systems at a frequency that ensures hydraulic capacity is maintained.	Track 1 and as applicable to Track 2	Demonstration of Milestones/Goal Achievement	
Annual trash assessment at all locations where Other Treatment Controls, and/or Institutional Controls have been implemented.	Track 2	Demonstration of Milestones/Goal Achievement	
Permittees shall report via SMARTS an Annual Trash Monitoring Report.	Both Reporting requirements would differ depending on track	Monitoring/Reporting	T
Permittees shall annually provide their local vector control agencies with the name and location of already installed and proposed during the following year Certified Full Capture Systems.	Track 1 and as applicable to Track 2	Monitoring/Reporting	

X = potentially sign on sheet 1
T = TBD on sheet 1. We may not need this distinction if we want to discuss.