



California Regional Water Quality Control Board Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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WATERSHED PROTECTION DIST.

Mr. Gerhardt Hubner, P.G., Deputy Director
Water & Environmental Resources
Ventura County Watershed Protection District
800 South Victoria Avenue
Ventura, CA 93009-1600

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REVIEW OF THE VENTURA COUNTYWIDE STORMWATER MONITORING PROGRAM 2004/2005 MONITORING REPORT, JULY 2005.

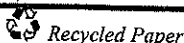
Dear Mr. Hubner:

Thank you for submitting the Ventura Countywide Storm Water Monitoring Program's 2004/05 Monitoring Report (Report), which we received on July 8, 2005. We have reviewed the Report and the following are our comments based on our review.

Monitoring

- The Report is to have represented the County's Storm Water Monitoring Program during the 2004/2005 water year. Data represented in the Report does not fully show storm water monitoring for the 2004/2005 water year. For mass emission stations, the NPDES Permit CAS004002 (Permit) states: "Up to six station events per year, including a minimum of 2 dry weather samples must be monitored." This is interpreted to mean that at least 6 samples are to be taken each water year (4 wet weather samples and 2 dry weather samples). Data from the county's mass emission stations shows that 4 wet weather samples were collected during the 2004/2005 water year, except sampling event 3 collected samples from a storm event that had less than .25 inches of rain for 7 out of 8 monitoring stations. The required 2 dry weather sampling events were not taken during the 2004/2005 water year. If in fact samples have been collected, then the collection dates and results were not included in the Report, as required. The Report does not contain the required 2 dry weather sampling events, as noted for the 2003/2004 Report, also.

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Mr. Gerhardt Hubner, P.G., Deputy Director -3 of 3-
Water & Environmental Resources
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- When a certain species of organism such as: purple sea urchin (*Strongylocentrotus purpuratus*) has been routinely used for toxicity testing in a program, it is not recommended to change the testing species during the course of the program. It would have been advisable to have not tested, than in mid-stream change the testing species.
- Acute toxicity tests were not performed at the Mass Emission stations and are to be.
- The next Permit will re-evaluate the testing procedures for both acute and chronic toxicity testing.

Data Analysis and Discussion - Water Quality Objective Comparisons:

- The Water Quality Control Plan for Ocean Waters of California (Ocean Plan), which contains water quality objectives for the coastal waters of California, is appropriate to be used in comparing the County's monitoring data to water quality exceedances. Section C.1 of the *California Ocean Plan* states: "Nonpoint sources of waste discharges to the ocean are subject to Chapter I Beneficial Uses, Chapter II – WATER QUALITY OBJECTIVES (wherein compliance with water quality objectives shall, in all cases, be determined by direct measurements in the receiving waters) and Chapter III – PROGRAM OF IMPLEMENTATION Parts A.2, D, E, and H." This comment was noted for the 2003/2004 Report, also.

Data Analysis and Discussion - Mass Emission and Receiving Water Analysis:

- Monitoring data are to be compared to both acute and chronic criteria in the California Toxics Rule. In toxicity testing, it is the sub-lethal effect of the exposure that is being tested rather than the duration of exposure. Sub-lethal effects include damage to reproductive rates, growth, etc. Acute testing is showing lethal effects- death. This comment was noted for the 2003/2004 Report, also.

If you have any questions concerning this matter, please call me at (213) 620-2095.

Sincerely,



Tracy Woods, Environmental Scientist
Municipal Stormwater Permitting

cc: Ms. Darla Wise, Ventura County Watershed Protection District

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