

# LECL TMDL Task Force Meeting

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FEBRUARY 15, 2023



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# Considerations Regarding the Expression of Wasteload Allocations and Load Allocations in Permits

INCORPORATING LANGUAGE IN THE BASIN PLAN THAT  
CLEARLY EXPLAINS HOW PERMIT WRITERS SHOULD EXPRESS  
WASTELOAD AND LOAD ALLOCATIONS IN PERMITS

# Options for Incorporating TMDLs Into Permit Requirements – NPDES Permittees

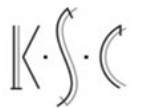
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## Numeric Water Quality Based Effluent Limitations

- Concentration and/or Load Based
- Must be consistent with the WLAs

## Non-numeric Water Quality Based Effluent Limitations

- Measurable, objective BMP-based limit that is projected to achieve the WLAs



# Options for Incorporating TMDLs into Permit Requirements – Non-NPDES Permittees

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Receiving Water Limitations

Numeric Effluent Limitations

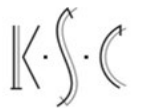
Management Practices and/or Plans



# EPA Guidance for Stormwater

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- WLA should, where feasible, be translated into effective, measurable WQBELs that will achieve the WLA
- May be numeric limit
  - Numeric expressions are quantifiable performance requirement but may vary
  - May be receiving water limits
- May be measurable, objective BMP-based limit projected to achieve the WLA
- May be a hybrid approach
- NPDES authorities have flexibility for setting appropriate deadlines



# Draft justification that management plans constitute BMP-based WQBELs

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- Can include specific criteria related to projections for achieving wasteload allocations
- Can include measurable objectives
- Can include interim milestones
- Can identify specific BMPs and time for implementation



# Example of Use of a Plan

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## Central Valley Pyrethroid TMDL

- “... shall attain the wasteload allocations by developing and implementing a Pesticide Plan that identifies management practices to reduce pyrethroid pesticides in urban runoff to the maximum extent practicable.”
- “Management practices may be implemented by individual urban runoff management entities, jointly by two or more entities acting in concert, or cooperatively through a regional or statewide approach....”



# Demonstrations of Compliance v. Expressions of WLA in Permits

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- Both designed to improve water quality
- Both designed to achieve beneficial use protection
- Both designed to provide flexibility for showing permit compliance
- One may result in a more traditional numeric WQBEL
- Other may allow better allow for a non-numeric WQBEL

