

Municipal Regional Permit (MRP) - Summary for POTWs and Collection Systems

*NACWA 2010 National Pretreatment and
Pollution Prevention Workshop*

Phoenix, AZ

May 21, 2010

Tim Potter

*Environmental Compliance Superintendent
Central Contra Costa Sanitary District*



MRP - Summary for POTWs and Collection Systems

May 21, 2010

Presentation Overview

- ★ *What is the MRP?*
- ★ *Why is it a concern to wastewater agencies?*



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What is the MRP?

- ▶ *NPDES permit issued to most stormwater management agencies in SF Bay Area*
- ▶ *Goal to establish consistent standards to protect stormwater quality*
- ▶ *Some pollutants given specific standards*



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Elements of the MRP

- ▶ *Discharge Prohibitions and Receiving Water Limitations (C.1)*
- ▶ *Municipal Operations (C.2)*
- ▶ *New Development and Redevelopment (C.3)*
- ▶ *Industrial and Commercial Site Controls (C.4)*

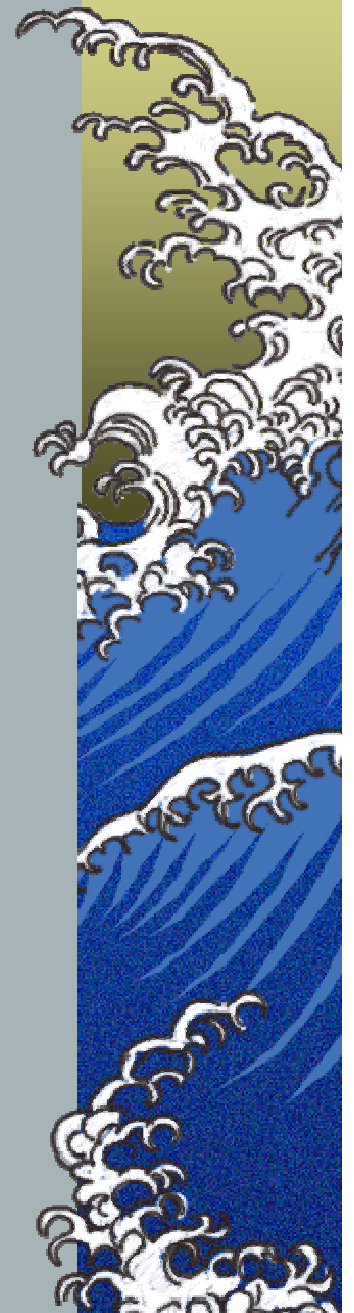


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Elements of the MRP (cont.)

- ▶ *Illicit Discharge Detection and Elimination (C.5)*
- ▶ *Construction Site Control (C.6)*
- ▶ *Public Information and Outreach (C.7)*
- ▶ *Water Quality Monitoring (C.8)*

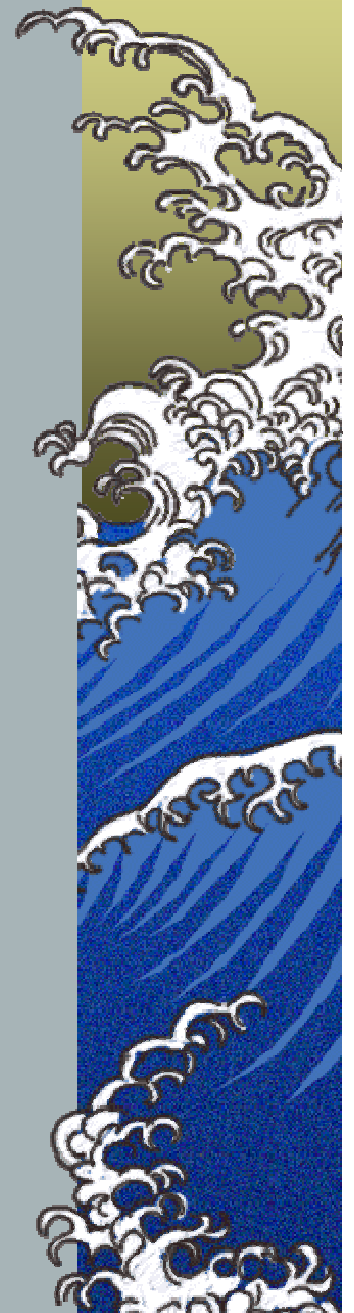


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Elements of the MRP (cont.)

- ▶ *Pesticides Toxicity Control (C.9)*
- ▶ *Trash Load Reductions (C.10)*
- ▶ *Mercury Controls (C.11)*
- ▶ *PCBs Control (C.12)*



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Elements of the MRP (cont.)

- ▶ *Copper Control (C.13)*
- ▶ *PDBE, Legacy Pesticides, and Selenium (C.14)*
- ▶ *Exempted and Conditionally Exempted Discharges (C.15)*
- ▶ *Annual Reports (C.16)*



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Why is the MRP a concern to wastewater agencies?

▶ *Stormwater control strategies in MRP include diversions to sanitary sewer system*



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MRP Diversions to Sanitary Sewer

- ▶ *Stormwater BMP vs Control Strategy*
- ▶ *All MRP diversions defer to sanitary sewer agencies' authority to accept, deny, or condition the acceptance of the source*
 - ▶ *Many diversions make sense to keep polluted waters out of the storm drain system*
 - ▶ *Standards for acceptance*
 - ▶ *De minimis issues for rainfall exposure*



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Major Diversions to Sanitary Sewer

- ▶ *Dry Season / First Flush*
 - ▶ *Street Flushing*
 - ▶ *Targeted Number of Pilot Projects*
 - ▶ *Bay Area Clean Water Agencies (BACWA)*
- White Paper in Process*



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Major Diversions – Issues to Consider

▲ *Defining First Flush*

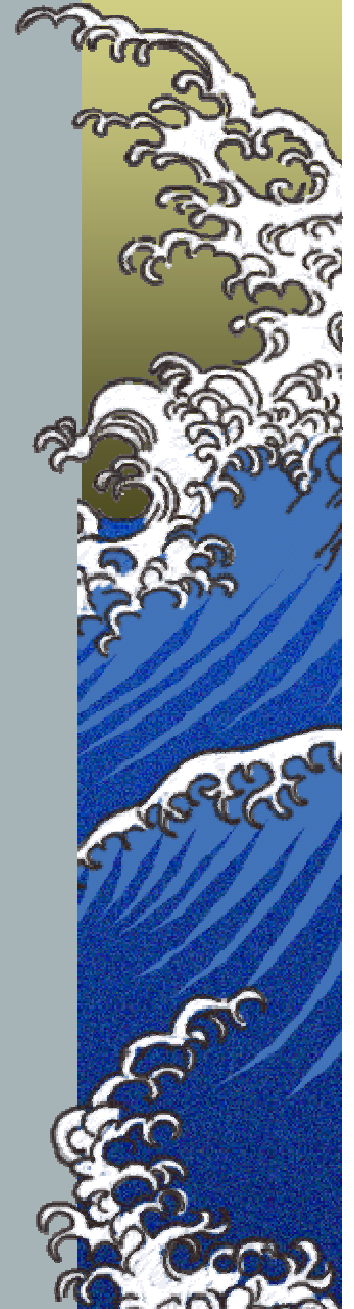
▲ *First 0.1 in. of first rain event vs. each rain event of wet season*

▲ *Defining Dry Season Flows*

▲ *Anthropogenic vs. Natural Sources*

▲ *Street Flushing*

▲ *Selected Areas vs. Blanket Access*



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Minor Diversions to Sanitary Sewer Collection Systems

- ▶ *Smaller in volume per discharge*
- ▶ *Flow rate could be localized problem*
- ▶ *Controls can protect treatment plant and collection system operations*
- ▶ *How will we know about them?*



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Examples of Minor Diversions

Explicit Diversions

- ▶ *Pool/spa/fountain draining*
- ▶ *Spill response – Municipality corp yards*
- ▶ *Surface cleaning – sidewalks/plazas, pavement*
- ▶ *Outdoor wash areas/Trash enclosures*
- ▶ *Fire suppression system test water*
- ▶ *Concrete saw cutting*



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Examples of Minor Diversions

Implied Diversions

- ▶ *Copper algaecides in pool water*
- ▶ *Mobile washers (BASMAA standards)*
- ▶ *Roof drains for rooftop equipment (e.g. grease hoods, copper-bearing ventilation systems)*
- ▶ *Fire fighting runoff (if prevented from entering storm drains)*



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Examples of Minor Diversions

Potential Inadvertent Diversions

- ▶ *Foundation drains*
- ▶ *Air conditioner condensate drains*
- ▶ *Water system discharges*
- ▶ *Architectural copper cleaning wastes*

*Generally because MRP standards may make
discharge to sanitary sewer easier*

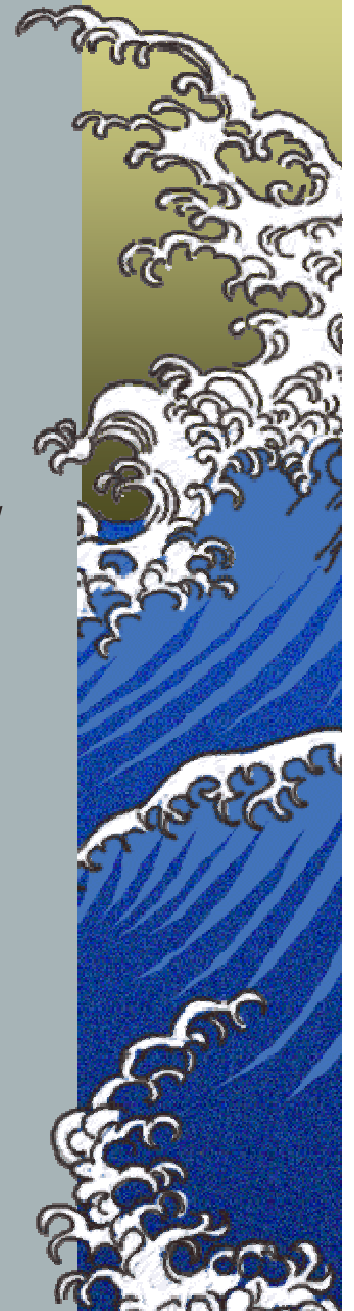


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Preparing for Diversions

- ▶ *Identify diversions your agency wants to control*
- ▶ *Identify sources your agency will not accept*
- ▶ *Set standards and procedures for accepting diversions*
- ▶ *Communicate program elements to stormwater program staff/building officials*

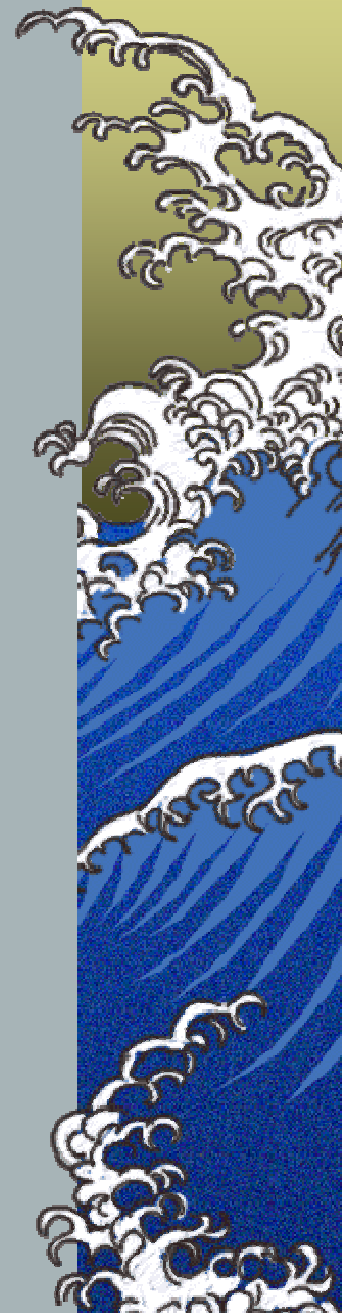


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Summary of Process and Next Steps

- ✓ *RWQCB staff responded positively to most of CCCSD and BACWA comments*
- ✓ *Some appeals have been filed – don't affect diversions*
- ✓ *Work with MRP permittees to manage potential impacts of implementation on treatment plant and collection system operations*
- ✓ *BACWA White Paper project for major diversions to address wastewater operations*



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Questions/Suggestions?

Tim Potter

Environmental Compliance Superintendent

Central Contra Costa Sanitary District

Martinez, California 94553

(925) 229-7380

tpotter@centralsan.org

