

MOSQUITO AND VECTOR CONTROL ASSOCIATION OF CALIFORNIA
MEMBERSHIP COMMUNICATION
September 16, 2010

In an effort to keep all MVCAC members apprised of the ongoing development of the NPDES permit with the State Water Resources Control Board (SWRCB), below is a list of tasks and proposed timeline related to the permit. Please note that the timeline is pending the posting of the NPDES draft permit by SWRCB, which is anticipated on September 17, 2010 or the following week. All dates are tentative, and will be confirmed via email as they are known.

Tasks

1. Continue to work with the SWRCB staff on developing the best possible permit terms. (G. Goodman)
2. Revise/finalize the Association Rules and Policies Governing NPDES Permit Coalition Monitoring Program and the related Application and Agreement to Participate in Monitoring Program. (R. Shanahan)
3. Distribute the approved Rules and Policies Governing NPDES Permit Coalition Monitoring Program and Application and Agreement to Participate in Monitoring Program to member districts and request approval and return of Application/Agreement by participating districts. (C. Smith)
4. Draft a model Pesticide Application Plan (PAP) for use by the member districts. (J. Scott) Note that the draft NPDES permit contains many requirements for the PAP, including a monitoring plan prepared in accordance with the NPDES permit monitoring and reporting program, a description and evaluation of best management practices, and an off-target drift management plan (unless deleted by the SWRCB in light of recent e-mails regarding drift). Jamie may need the ongoing assistance of URS.
5. Provide the draft model PAP to the Regional Water Quality Control Boards for their review and comment. Under the proposed draft NPDES permit, a member district's permit coverage will not be effective until the member district has submitted a complete notice of intent and the PAP has been approved by the Executive Officer of the district's Regional Board. In light of this requirement, it is advisable, if there is time, to provide the model PAP to each of the Regional Boards for their review and input prior to any member district submitting a notice of intent. With a pre-NOI review, we may be able to flesh out and address any Regional Board issues or concerns and determine whether any Regional Board-specific PAPs need to be prepared.
6. Prepare comments and presentation for the 10/19/10 (tentative) SWRCB hearing. (J. Davis/G. Goodman)
7. Prepare a request for proposals for monitoring services; distribute; review and select a consultant. (C. Smith/R. Shanahan)
8. Prepare NPDES coalition instructions and forms for distribution to the participating member districts. (C. Smith/R. Shanahan)

Schedule

Here is a preliminary schedule including tasks, deadlines and significant events for between now and next April. This schedule assumes a 10/19/10 SWRCB public hearing on the draft permit and SWRCB adoption on 1/4/11.

Now to January 4, 2011	G. Goodman and committee continue to work with the SWRCB staff on developing the best possible permit terms. Prepare and submit comments on public draft NPDES permit when posted by SWRCB.
September 2010	R. Shanahan to finalize the Rules and Policies Governing NPDES Permit Coalition Monitoring Program and Application and Agreement to Participate in Monitoring Program and provide to C. Smith to include in 11/4/10 MVCAC Board meeting packet.
Now to November 2010	J. Scott and committee to draft a model Pesticide Application Plan.
September to October 2010	J. Davis and G. Goodman to arrange MVCAC comments and presentation for the 10/19/10 SWRCB hearing.
October 19, 2010	SWRCB public hearing on draft permit.
Upon completion of initial draft PAP	C. Smith and R. Shanahan to prepare a request for proposals for monitoring services.
November 4, 2010 (MVCAC Board meeting)	MVCAC Board to (1) approve Rules and Policies Governing NPDES Permit Coalition Monitoring Program and Application and Agreement to Participate in Monitoring Program, (2) authorize C. Smith to distribute same to member districts, (3) authorize C. Smith to prepare and distribute RFP for monitoring services, and (4) authorize Executive Committee to review responses to RFP and select and contract with monitoring services firm. Other items?
November 2010	C. Smith to distribute the approved Rules and Policies Governing NPDES Permit Coalition Monitoring Program and Application/Agreement to member districts and request approval and return of Application/Agreement by participating districts (due by 12/31/10).
November to December 2010	C. Smith and Executive Committee RFP process to select monitoring services consultant.
December 2010 to January 2011	J. Scott to provide the draft model PAP to the Regional Boards for their review and comment. Also should inform the Regional Boards about the expected member district NOIs and PAPs and the need for 30-day review and approval around March 2011.
December 31, 2010	Deadline for member districts to submit the Application/Agreement.
January 4, 2011	SWRCB meeting to adopt permit.
January 2011	J. Scott to revise/finalize the draft PAP to incorporate Regional Board comments.
January 2011	C. Smith and R. Shanahan to prepare and distribute instructions and forms to the participating member districts.
February 2, 2011	MVCAC Board meeting. Any action items for the Board?
January to February 2011	Member districts prepare and submit individual district NOI, PAP (based on model), and related materials to Regional Board.
March 2011	Regional Board approves the member district PAP and issues a Notice of Applicability to the district. The NOA will specify the types of pesticides that may be used and any Region-specific conditions and requirements not stated in the General Permit. Member district permit becomes effective on the date of the NOA.
April 2011	MVCAC and new monitoring services consultant begin coalition monitoring under permit.
April 9, 2011	Stay expires in National Cotton Council case; EPA regulatory exemption is vacated.