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Toxicity Identification Evaluation / Toxicity Reduction Evaluation Implementation Draft Work Plan

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TABLE OF CONTENTS

1.0 INTRODUCTION 1
2.0 Receiving Water Toxicity Testing 3
3.0 TIE/TRE PROCESS 3
3.1 Information and Data Acquisition 3
3.2 TIE Testing 3
3.3 Toxicity Source Evaluation 5
3.4 Toxicity Control Evaluation 7
3.5 Toxicity Control Implementation 8
3.6 Quality Assurance/Quality Control 8
3.7 TIE/TRE Limitations 9
4.0 REFERENCES 10

LIST OF FIGURES

Figure 1-1. Example Receiving Water Monitoring and TIE/TRE Decision Framework 2
Figure 3-1. The Toxicity Source Evaluation Approach 6
Figure 3-2. Components of Toxicity Control Evaluation 8

LIST OF TABLES

Table 2-1. Transitional and Long-Term Receiving Water Toxicity Tests 3
Table 3-1. Phase I TIE Receiving Water Sample Manipulations 4

LIST OF ACRONYMS

2007 Permit	RWQCB Order No. R9-2007-0001
2013 Permit	RWQCB Order No. R9-2013-0001
BMP	best management practice
BSA	bovine serum albumin
CLRP	Comprehensive Load Reduction Plan
Copermittees	San Diego Regional Copermittees
EDTA	ethylenediaminetetraacetic acid
IWC	instream waste concentration
JRMP	Jurisdictional Runoff Management Plan
LC_{50}	median lethal concentration
LID	low impact development
MAP	Monitoring and Assessment Plan
MEP	maximum extent practicable
MS4	multiple separate storm sewer system
NOEC	no observed effect concentration
NPDES	National Pollutant Discharge Elimination System
PBO	piperonyl butoxide
QA/QC	quality assurance/quality control
RWQCB	Regional Water Quality Control Board
SMC	Stormwater Monitoring Coalition
SPE	solid phase extraction
STS	sodium thiosulfate
SWRCB	State Water Resources Control Board
TDS	total dissolved solids
TIE	toxicity identification evaluation
TMDL	Total Maximum Daily Load
TRE	toxicity reduction evaluation
TST	Test of Significant Toxicity
USEPA	United States Environmental Protection Agency
WMA	Watershed Management Area
WQIP	Water Quality Improvement Plan
WURMP	Watershed Urban Runoff Management Program

UNITS OF MEASURE

ppt	parts per thousand
%	percent
<	less than
>	greater than

1.0 INTRODUCTION

In May of 2013, San Diego Regional Water Quality Control Board (RWQCB) Order No. R9-2013-0001 (2013 Permit) was adopted. Provision B of the 2013 Permit requires Copermittees in each Watershed Management Area (WMA) to develop a Water Quality Improvement Plan (WQIP) which, per Provision B.4, incorporates a Monitoring and Assessment Program (MAP). Also, per Provision D.1.c.(4)(f), "*If chronic toxicity is detected in receiving waters, the Copermittees must discuss the need for conducting a TIE/TRE in the assessments required under Provision D.4.a.(2), and develop a plan for implementing the TIE/TRE to be incorporated in the Water Quality Improvement Plan*."

A toxicity identification evaluation (TIE) is defined by the 2013 Permit as "*A set of procedures for identifying the specific chemical(s) responsible for toxicity. These procedures are performed in three phases (characterization, identification, and confirmation) using aquatic organism toxicity tests*." A toxicity reduction evaluation (TRE) is defined as "*A study conducted in a step-wise process designed to identify the causative agents of effluent or ambient toxicity, isolate the sources of toxicity, evaluate the effectiveness of toxicity control options, and then confirm the reduction in toxicity. The first steps of the TRE consist of the collection of data relevant to the toxicity, including additional toxicity testing, and an evaluation of facility operations and maintenance practices and best management practices. A TIE may be required as part of the TRE, if appropriate*."

This Work Plan outlines the process used to identify chronic toxicity in receiving waters, as well as guidance to prioritize the need to implement a TIE/TRE based on the magnitude and persistence of chronic toxicity. The Work Plan refers to the appropriate references for detailed sampling and analytical/toxicity test methods specific to the TIE/TRE treatment process. An example of a potential TRE decision process for receiving water samples (Stormwater Monitoring Coalition (SMC) Model Monitoring Technical Committee, 2004) is presented in Figure 1-1. The process should be modified on location-specific and pollutant-specific basis, and a detailed work plan should be developed for the implementation of a pollutant reduction program once the specific pollutant(s) causing toxicity exceedances are identified.

This Work Plan focuses primarily on the implementation of the TIE/TRE process, recognizing the limitations of utilizing TRE guidance developed for point source discharges. Receiving water stations potentially capture pollutants from many sources with runoff flows and contaminant concentrations likely more variable than those from point source discharges. However, with modifications to the TRE guidance developed for point source discharges, a TRE may be conducted to attempt to identify sources of toxicity, propose mitigation measures for these sources, and conduct follow-up studies to confirm toxicity reduction. Any activities that result in consistently reducing toxicity to an acceptable level may be considered TRE activities (USEPA 2001).

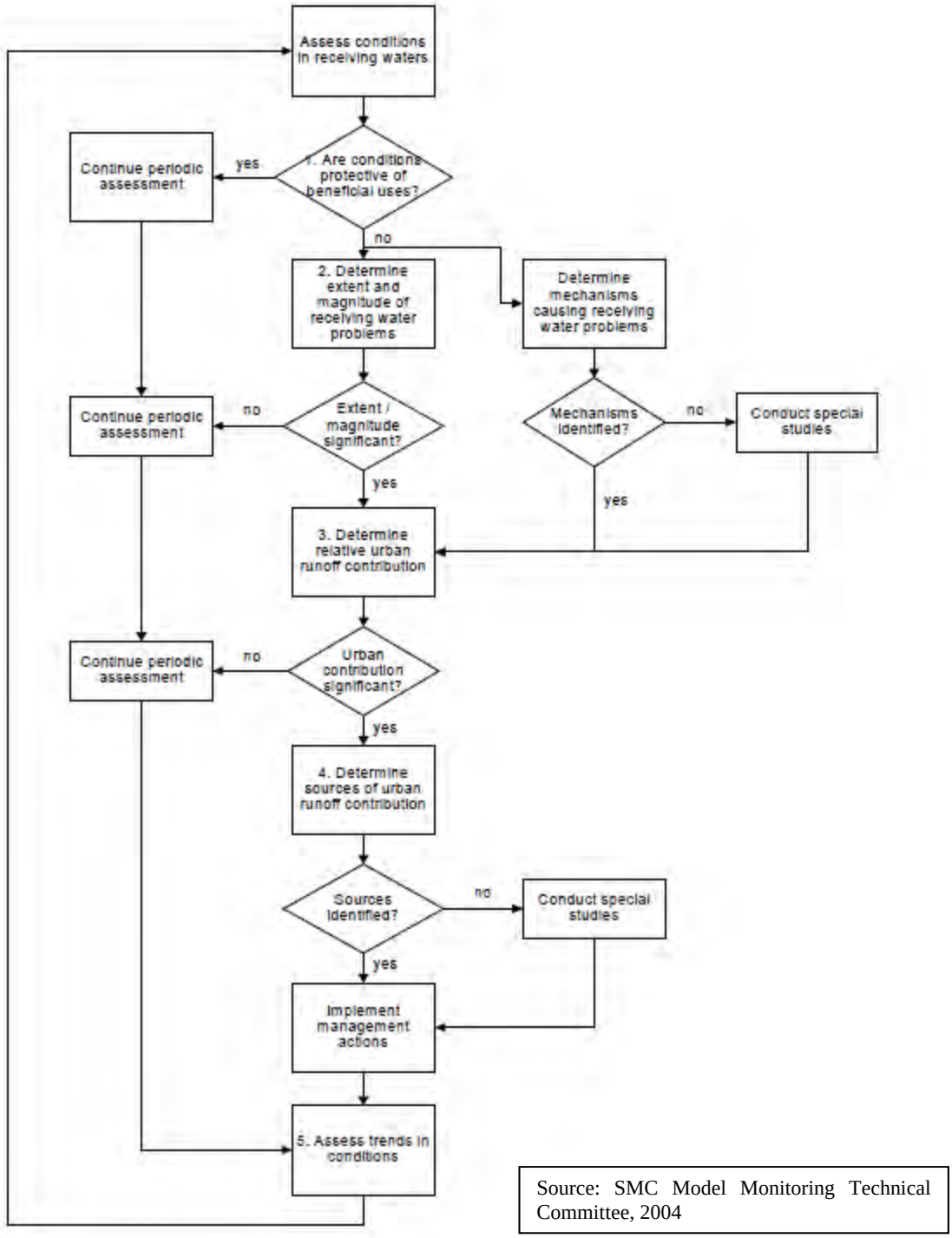

Figure 1-1. Example Receiving Water Monitoring and TIE/TRE Decision Framework

2.0 RECEIVING WATER TOXICITY TESTING

Receiving water monitoring is conducted by the San Diego Regional Copemittees (Copermittees) in accordance with Provision D of the 2013 Permit and chronic toxicity is one of the parameters evaluated in both wet and dry weather receiving water samples. Under the long-term monitoring requirements of the 2013 Permit, chronic toxicity tests are conducted in accordance with Provision D.1.c.(4)(e) as summarized in Table 2-1. Toxicity is evaluated using the Test of Significant Toxicity (TST) as outlined in the *National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document* (USEPA, 2010). The TST approach assigns a Pass or Fail result based on whether the organism response observed at the chronic instream waste concentration (IWC) of 100 percent (%) receiving water is significantly different from that in the control treatment. When chronic toxicity is observed in receiving water samples (i.e., the sample receives a "Fail" based on the TST), implementation of a TIE/TRE process following the phased approach described in subsequent sections will be considered, as appropriate.

Table 2-1. Transitional and Long-Term Receiving Water Toxicity Tests

Organism	Endpoint	Toxicity Threshold	USEPA Protocol
Monitoring in accordance with Order No. R9-2013-0001, Salinity < 1 ppt			
Ceriodaphnia dubia	Chronic survival and reproduction	Pass/Fail	EPA-821-R-02-013
Selenastrum capricornutum	Chronic growth		
Pimephales promelas	Chronic survival and growth		
Monitoring in accordance with Order No. R9-2013-0001, Salinity ≥ 1 ppt			
Strongylocentrotus purpuratus	Chronic development	Pass/Fail	EPA-600-R-95-136

3.0 TIE/TRE PROCESS

3.1 Information and Data Acquisition

Prior to initiating the TIE/TRE process, an evaluation of sampling and toxicity testing procedures should be conducted to assess whether toxicity may have been introduced during these procedures or errors may have been made. This may include a review of the following:

- Sampling equipment decontamination procedures
- Field and laboratory logs
- Laboratory reports

If all test acceptability criteria are met and no errors are identified, Copermittees will consider implementing the TIE/TRE process. Conducting a TIE is often the first step to identifying the toxicant.

3.2 TIE Testing

TIEs may be conducted in accordance with USEPA guidance for characterizing, identifying, and confirming toxicity (USEPA 1991, 1992, 1993a, and 1993bPriority may be given to stations

exhibiting significant and persistent toxicity that has not previously been characterized and where analytical results indicate that a specific toxicant may be causing or contributing to toxicity. The sample may be evaluated for TIE suitability using the following assessments:

- Presence of Persistent Toxicity: toxicity is considered persistent if more than 50% of samples (generally during a monitoring year) collected at a station receive a "Fail" based on the test of significant toxicity (TST) .
- Magnitude of Toxicity: based on past experience, a 50% response rate(i.e. 50% of test organisms respond in a 100% receiving water sample) can provide a reasonable opportunity for a successful TIE.
- Previous Characterization: TIEs are generally prioritized for receiving water stations where previous TIEs have not characterized the pollutant(s) causing toxicity. However, TIE/TRE procedures should not be ruled out for previously characterized stations since contributor(s) to toxicity may change over time.

The TIE approach is divided into three phases, as described in USEPA (1991) and summarized as follows:

- Phase I – characterizes the physical/chemical nature of the constituent(s) which cause or contribute to toxicity. Such characteristics as solubility, volatility and filterability are determined without specifically identifying the toxicants.
- Phase II – utilizes methods to specifically identify toxicants.
- Phase III – utilizes methods to confirm the suspected toxicants.

Phase I (characterization) manipulations of receiving water samples generally include those presented in Table 3-1.

Table 3-1. Phase I TIE Receiving Water Sample Manipulations

Physical and Chemical Manipulations on Receiving Water Samples	Purpose of Test
Baseline	Confirms toxicity is still present in the sample at time of TIE testing
Filtration	Detects particulates or particulate-bound toxicants
Aeration	Detects volatile, oxidizable, sublatable, or spargeable compounds
Ethylenediaminetetraacetic acid (EDTA) addition	Detects cationic metals (e.g., cadmium)
Sodium thiosulfate (STS) addition	Detects oxidative compounds (e.g., chlorine)
Solid phase extraction (SPE) over C18 column (may be followed by methanol elution)	Detects non-polar organics and some surfactants (methanol elution adds toxicity back to sample)
Piperonyl butoxide (PBO) addition	Detects organophosphate pesticides and pyrethroids

Carboxyl esterase addition*	Hydrolyzes pyrethroids
Bovine serum albumin (BSA) addition	Protein BSA is used as a control for the carboxyl esterase
Temperature reduction	Increases toxicity of pyrethroid pesticides
pH adjustment	Detects pH-dependent toxicants (e.g., ammonia and sulfides)
* Carboxylesterase addition has been used in recent studies to help identify pyrethroid-associated toxicity (Wheelock et al., 2004; Weston and Amweg, 2007). However, this treatment is experimental in nature and should be used along with other pyrethroid-targeted TIE treatments (e.g., PBO addition).	

Adjustments may be made to these TIE protocols if specific contaminants are suspected to be contributing to toxicity. For example, total dissolved solids (TDS) controls and/or mock effluents to mimic TDS concentrations observed in samples are often added to the treatments listed in Table 3-1 if ionic imbalance or elevated TDS are suspected. Toxicity due to ionic imbalance occurs when ion concentrations are not within the tolerance range of the selected test organism; utilizing *S. purpuratus* for toxicity tests conducted for samples with salinity > 1 ppt may help to alleviate this common issue, especially during dry weather.

Phase II and III TIEs may be necessary, depending whether the Phase I determination of toxicant class is sufficient for identifying pollutants for outfall monitoring and/or identifying source control measures. If necessary, Phase II and III procedures may include toxicant removal and add-back, serial additions, and/or toxicant spiking experiments in accordance with USEPA 1993a and 1993b.

It should be noted that, due to intermittent toxicity and/or toxicity resulting from multiple toxicants, TIEs are not always conclusive. In such cases, conducting toxicity tests with additional organisms (SMC Model Monitoring Technical Committee, 2004) and/or serially identifying toxicants (USEPA, 2001) may help characterize observed toxicity. When a receiving water sample exhibits persistent toxicity of a high magnitude, as is generally the case when TIEs are conducted, TIEs are typically successful (USEPA, 2001).

3.3 Toxicity Source Evaluation

Once any toxicants have been identified during the TIE process, Copermittees must discuss the need for conducting a TRE. The following sections provide an outline for developing specific monitoring elements intended to focus the effort in locating the source(s) of the pollutant(s).

If urban runoff is suspected as a significant source of the pollutant(s) characterized by a TIE to be a contributor to toxicity at a receiving water station, source identification procedures may need to be considered. An evaluation of chemistry and bioassessment data for the receiving water station and chemistry data for upstream outfalls may help to confirm whether urban runoff is a significant source of the pollutant(s) causing toxicity and may justify further source identification procedures.

More comprehensive source identification procedures, if warranted, may include compiling descriptions of all potential sources to the receiving water station, determining actual sources and

their relative magnitudes, and quantitatively estimating loads from these sources. A model for a source identification investigation study is outlined in the *Model Monitoring Program for Municipal Separate Storm Sewer Systems in Southern California* (SMC Model Monitoring Technical Committee, 2004) and more detailed source identification study methodology is outlined in USEPA (1993c) and by Pitt (2004). The general approach may include a combination of the components presented in Figure 3-1.

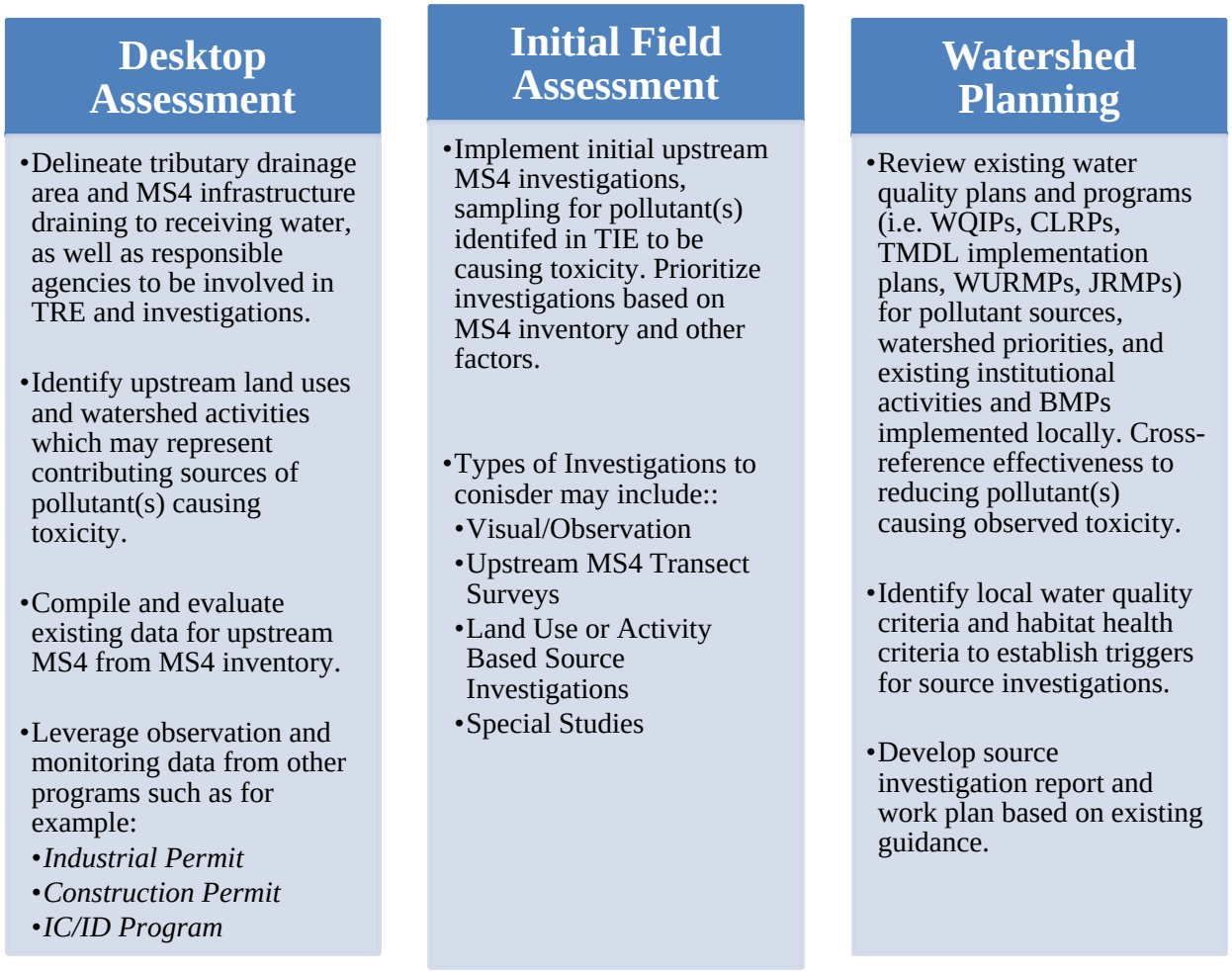

Figure 3-1. The Toxicity Source Evaluation Approach

Source identification efforts may coordinate with monitoring and assessment activities necessary for compliance with the following Provisions:

- Provision A.4.a.(2) – If it is determined that discharges from the MS4 are causing or contributing to a new exceedance of an applicable water quality standard not addressed by the WQIP, update the WQIP with the water quality improvement strategies implemented or to be implemented, the implementation schedule, and the monitoring and assessment program updates intended to track progress toward achieving compliance.

- Provision B.2.d – identify and prioritize known and suspected sources of stormwater and non-stormwater pollutants from MS4 outfalls that contribute to the highest priority water quality conditions, as identified in the WQIP.
- Provision B.3 – identify water quality improvement goals and strategies to address the highest priority water quality conditions, as identified in the WQIP.
- Provision D.2.b – perform dry weather MS4 outfall monitoring to identify non-storm water flows and illicit discharges within its jurisdiction and to prioritize these discharges for investigation and elimination.
- Provision D.2.c – perform wet weather MS4 outfall monitoring to identify pollutants in storm water discharges from the MS4, guide pollutant source identification efforts, and determine compliance with applicable Total Maximum Daily Loads (TMDLs).
- Provision D.3 – conduct special studies related to the highest priority water quality conditions. Provision D.3.c specifies that special studies related to pollutant and/or stressor source identification should include a compilation of known information on the pollutant and/or stressor, an identification of data gaps intended to be filled by the studies, and a monitoring plan which includes, among other required elements, a prioritization of sources of the pollutant and/or stressor.
- Provision E.2 – implement a program to detect and eliminate illegal discharges and improper disposal into the MS4.

If no source can be identified as a major contributor to receiving water toxicity, more intensive follow-up studies may be required.

3.4 Toxicity Control Evaluation

Using the results from the TRE elements conducted to this point, alternatives for reducing receiving water toxicity may be identified and the most feasible approach(es) may be selected. Pollution Prevention measures are designed to target pollutants and wastes before they are generated, while Source Controls are designed to reduce or eliminate pollutants before entering the MS4. These measures may include outreach, incentive programs, regulatory controls, and enforcement activities, as well as broader “true source controls” that must be implemented at a national or state level (e.g., product regulation). Institutional Programs, such as street sweeping, MS4 cleaning and repair, and other institutional services are typically maintenance activities implemented by agencies at various targeted frequencies to meet pollutant load reduction goals and minimum National Pollutant Discharge Elimination System (NPDES) Permit compliance criteria. Treatment Controls include structural systems designed to remove pollutants from stormwater and non-stormwater flows and may include a variety of low impact development (LID) and best management practices (BMPs) (e.g., infiltration-type, bioremediation, treatment trains, etc.). These BMPs are intended to protect receiving waters by eliminating or reducing the discharge of pollutants to the maximum extent practicable (MEP). Advantages and disadvantages of BMP alternatives should be considered, and appropriate BMPs should be selected based on site-specific conditions and pollutant(s) of concern. An integrated approach using a combination of Pollution Prevention measures, Institutional Programs, and Treatment Controls may be appropriate if more than one pollutant is identified to be causing or contributing to toxicity, or if

the source is unknown. These three components of the toxicity control evaluation are shown in Figure 3-2.

Figure 3-2. Components of Toxicity Control Evaluation

3.5 Toxicity Control Implementation

Once the selected toxicity control method(s) are implemented, monitoring may be continued and possibly accelerated to confirm that toxicity reduction objectives are being met. Depending on the location and pollutant(s) being evaluated, some of this monitoring may be satisfied by Permit-required monitoring of receiving water and outfall locations (see Section 3.3).

Compliance with the monitoring and assessment requirements of the 2013 Permit, including Provision D.1.c.(4)(f) which requires the implementation of the TIE/TRE process described in this Work Plan, is intended to meet the discharge and receiving water limitations outlined in the 2013 Permit to the MEP. Updates to the monitoring programs developed to comply with these provisions will be incorporated into the WQIP through the adaptive management process outlined in Provisions B.4 and B.5 in order to continually monitor effectiveness and re-evaluate the programs.

3.6 Quality Assurance/Quality Control

A quality assurance/quality control (QA/QC) program for the TIE/TRE should be developed in order to ensure reliability of data collected throughout the process. The QA/QC program should include the QA/QC objectives, sample collection and preservation techniques, chain of custody procedures, analytical QA/QC, laboratory equipment maintenance, QA/QC training requirements, documentation and reporting procedures, and corrective action protocols (USEPA, 1993c). In addition, toxicology and analytical laboratories should be experienced and qualified to conduct the TIE/TRE.

3.7 TIE/TRE Limitations

There are inherent limitations associated with the TIE/TRE process summarized in this Work Plan, including the difficulty of characterizing intermittent toxicity (USEPA, 1993c) and/or toxicity resulting from multiple toxicants (USEPA, 2001). In addition, existing TRE guidance was developed primarily for point source discharges from wastewater treatment plants whereas receiving waters potentially capture pollutants from many sources and contain contaminants at more variable concentrations than those from a wastewater treatment facility, especially during a storm event.

4.0 REFERENCES

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