Message

From: Smith, DavidW [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=911849B6D8DB4194AC6D4B69051E3B74-DSMITH06]
Sent: 10/2/2018 8:58:35 PM
To: Roques, Dominic@Waterboards [Dominic.Roques@waterboards.ca.gov]; Marincola, Jamie [Marincola.JamesPaul@epa.gov]; Bromley, Eugene [Bromley.Eugene@epa.gov]
CC: Anderson, Tamara@Waterboards [Tamara.Anderson@waterboards.ca.gov]
Subject: RE: AMP - Sample Permit Language

Greetings- Here's the language from our soon to be finalized Guam MS4 permit

Permit Language

3.6.13 Asset Management Plan (AMP)

3.6.13.1 The permittee must develop and implementation of an asset management plan (AMP) in order to establish intended levels of service for its MS4 consistent with the conditions of this permit. The AMP shall inventory and assess the condition of all critical hard and soft assets and evaluate costs required to achieve intended levels of service, linking those costs to funding sources. The plan must include, at a minimum, the following:

3.6.13.1.1 Inventory of MS4 Assets. The permittee must identify and inventory all critical components of the MS4 including hard assets such as the storm drain system, structural controls and equipment individually valued over $5000. The purchase date, purchase price and replacement costs for the hard assets must also be included. Incorporation of hard asset information into the GIS required by Part 3.3.2 of the permit is recommended. In addition, the inventory must include soft assets such as the personnel performing the inspections required by permit.

3.6.13.1.2 Required Level of Service. The plan must identify the level of performance required for each of the assets, in particular the performance required to comply with the MS4 permit. The AMP must also include the current performance, consequence of failure and the likelihood of failure of each of the assets in the inventory.

3.6.13.1.3 Maintenance Rehabilitation, and Replacement Plan (MRRP). The permittee must develop and implement a MRRP. The MRRP must evaluate data obtained through asset assessment in order to inform a strategy for prioritizing and scheduling maintenance of the MS4 and rehabilitation and replacement of inventoried assets. The MRRP must be re-assessed annually to address changing conditions and resources.

3.6.13.1.6 Forecasting Costs. The permittee must project costs necessary to meet the desired level of service, at least through the end of the term of this permit. The permittee must then compare these projections with available funding sources to determine the best manner in which to fund operation and maintenance, repair, rehabilitation, and replacement of assets to sustain service and performance.

3.6.13.1.5 Climate Change Impacts. The permittee must identify new or increased threats to the MS4 resulting from climate change that may impact the desired levels of service in the next 50 years. The permittee must project upgrades to existing assets or new infrastructure projects, and associated costs, necessary to meet desired levels of service.

Fact Sheet Language

3.6.2 Asset Management Plan.

Lastly, Part 3.6.13 of the draft permit requires the development and implementation of an asset management plan (AMP). Region 9 has been emphasizing the development of AMPs in recent years as a useful tool for ensuring consistent performance of water infrastructure systems while minimizing the costs associated with the operation of these systems. The specific provisions of the draft MS4 permit were derived from a 2014 Region 9 AMP guide and

include requirements for an inventory of MS4 assets, an identification of the required performance, a plan for maintenance, rehabilitation and replacement of assets, cost projections, and an assessment of climate change impacts.

We may be able to provide some more guidance on this if you wish. Pls lmk.
Dave

From: Roques, Dominic@Waterboards [mailto:Dominic.Roques@waterboards.ca.gov]
Sent: Tuesday, October 2, 2018 1:31 PM
To: Smith, DavidW <Smith.DavidW@epa.gov>; Marincola, Jamie <Marincola.JamesPaul@epa.gov>
Cc: Anderson, Tamara@Waterboards <Tamara.Anderson@waterboards.ca.gov>
Subject: FW: AMP - Sample Permit Language

Dave or Jamie:
We are looking into permitting approaches that require asset management planning for MS4s in our re-issuance of the Salinas Phase I Permit (Sept. 2019). Is there a permit in Region 9, or elsewhere, that includes such language? My staff is not finding it readily.
Thanks,
dr

From: Anderson, Tamara@Waterboards
Sent: Tuesday, October 02, 2018 1:19 PM
To: Roques, Dominic@Waterboards <Dominic.Roques@waterboards.ca.gov>
Subject: AMP - Sample Permit Language

Hi Dominic,

EPA's "Asset Management: Incorporating Asset Management Planning Provisions into NPDES Permits" memo provides helpful information for drafting NPDES Phase I Permit AMP requirements. However, it would be great to see how other permits have incorporated these types of requirements. Page 9 of the memo mentions a few permits in EPA Regions 1 and 5 with AMP requirements. With Sarah's help, we located some of the NPDES municipal stormwater permits in these regions and I'm not easily able to find AMP-related requirements within these Permits.

Can you please contact EPA and ask if they can direct us to adopted Permits with good AMP requirements?

Thanks,
Tamara