

State of Oregon  
Department of Environmental Quality

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**Industrial Stormwater Advisory Committee  
Meeting 13 – January 18, 2011**

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Surface Water Management Section, Water Quality Division**

**Subject: Consideration of dilution applied to EPA benchmarks**

**Background:**

DEQ will be carrying over benchmark parameters specified by the current industrial stormwater permits, 1200-Z and 1200-COLS. In addition to these benchmarks, DEQ will be adopting EPA's sector specific benchmarks, identified in the Multi-Sector General Permit, for DEQ's new industrial stormwater permits. During the last committee meeting, committee members inquired about the potential to incorporate a dilution factor for the EPA benchmarks. Committee members cited the support DEQ provided for use of the dilution factor of five in risk based modeling of metals benchmarks for the 1200-Z.

**Evaluation:**

DEQ spoke with EPA Region 10 about applying a dilution to EPA's benchmarks. EPA indicated that DEQ may revise the sector specific MSGP benchmarks only if the change is supported by a solid technical justification. The dilution factor of five was evaluated for use in the risk based metals benchmark modeling, which also takes into consideration in-stream hardness and background pollutant concentrations. Because appropriately applying a dilution factor requires similar knowledge of relevant pollutant background conditions, the dilution factor cannot simply be applied uniformly to all benchmarks, and there is not sufficient justification for using a dilution factor to adjust EPA benchmarks. In addition, where benchmarks are technology-based, applying a dilution factor would not be appropriate. Therefore, DEQ does not plan to apply dilution factors to the EPA benchmarks.