

Salt and Nutrient Management Plan Annual RB4 Stakeholder Workshop

Los Angeles Regional Water Quality Control Board
November 15, 2011

Workshop Agenda

- Welcome and Introductions
- Further Guidance
- Stakeholder Activities
 - Central and West Coast Basins
 - Raymond and San Gabriel Basins
 - Santa Clara/Oxnard/Calleguas Basins
- Stormwater Reuse/Recharge
 - SCWC Stormwater Task force
- Question & Answer Session
- GAMA Presentation
- Wrap-Up

Welcome & Introductions

- Opening Remarks
 - Deborah Smith,
Chief Deputy Executive Officer

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FURTHER DIRECTION ON SNMP REQUIREMENTS

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The Recycled Water Policy

- SNMP Requirements
 - Locally driven and controlled collaborative process
 - Every Basin/Sub-basin in the state
 - Address Water Quality Concerns
 - Annual CEC Monitoring
 - Water Recycling/Stormwater Recharge
 - Source Identification/Assimilative Capacity/Loading
 - Implementation Measures
 - Antidegradation Analysis
- Other Considerations
 - Compliance with CEQA

The Collaborative Process

- Stakeholder driven
 - Local water and wastewater entities
 - Local salt/nutrient contributing stakeholders
 - Other stakeholders/ Interested Parties
- Stakeholder funded
- Regional Board Participation
 - Regulatory and Technical Guidance
 - Facilitate Information Sharing
 - Review draft documents
 - Prepare documents for Board Consideration

Every Basin – Really?

- Does every Basin need a SNMP
 - Yes, the Recycled water policy requires an SNMP for every basin
- Must stakeholders develop an SNMP
 - No SNMP development is voluntary
- What happens if no stakeholder SNMP is developed
 - RB will develop and until one is developed will permit on a case-by-case basis

What are the Water Quality Concerns?

- Basin Plan Salt and Nutrient Objectives
 - Basin/sub-basin specific limits for TDS, SO₄, Cl, Bo
 - General Nitrogen limits
- Key Water Quality Concerns
 - Central and West: Seawater Intrusion
 - San Gabriel/ Raymond: Nitrate, VOC, Superfund Site
 - San Fernando: Nitrate, VOC, PCE, Sulfate, Metals, Superfund Site
 - Santa Clara/Oxnard/Calleguas: Salts, Nutrients

CEC Monitoring Requirement

- Do all basins need to monitor for CEC?
 - Per the Policy, all Basins should
- What CECs should we monitor for
 - State Board to amend policy in 2012 to include requirements
- Are there any other CEC Considerations?
 - CDPH Recycled Water Requirements

What discharges are covered under the Policy?

- Are land discharges impacted by the SNMP requirement?
 - Per the recycled water policy, municipal ww sources
 - Such discharges are permitted under separate WDRs but should be considered during source identification, and calculation of loading estimates
- How will the SNMP requirements impact recycled water projects already in progress?
 - They should be taken into consideration in determining assimilative capacity and in basin management planning.

SNMP Anti-degradation Requirements

- What are the requirements for the SNMP?
 - All plans should include Anti-deg analysis demonstrating compliance with State Antideg Policy (Res 68-16)
- What does Resolution 68-16 Require?
 - Achieve the highest water quality consistent with the maximum benefit to the people of the state
 - Implement best practicable treatment or control of the discharge necessary to ensure that pollution or nuisance will not occur

Anti-degradation Analysis_1

- Under what conditions would a discharge be permitted?
 - When there is assimilative capacity
 - When beneficial uses will not be impacted
 - Where there is max. benefit
 - Where preventive measures have been taken
- What is the baseline
 - Determined per conditions since 1968

Anti-degradation Analysis_2

How much of the assimilative capacity can be used

- Not all
 - Buffer for varying environmental conditions
 - Future Use Considerations
- Single Projects <10% or Multiple<20%
 - Need to Verify use of assimilative capacity
 - Calculate long-term project impacts to determine if assimilative capacity will be exceeded

Anti-degradation Analysis_3

- Single Projects > 10% or Multiple >20%
- More rigorous analysis showing
 - Proposed project(s) necessary to accommodate important economic or social development
 - Reduction in water quality consistent with maximum benefit
 - Reduction in water quality will not unreasonably affect actual or potential beneficial uses
 - Water quality will not fall below water quality objectives

Anti-degradation Analysis_4

How do we determine maximum benefit?

Factors to be Considered

- Past Present and Probable beneficial uses of water
- Economic and social Impact
- Environmental aspects of proposed project
- Implementation of feasible alternative control measures to reduce eliminate or compensate for negative impacts

Anti-degradation_5

- What happens if there is no assimilative capacity?
 - Explore ways to create assimilative capacity where needed
 - Failing that, no discharge will be permitted
- How much of the assimilative capacity can be used?
 - Not 100%. Need to maintain buffers to
 - safeguard against varying operational & environ conditions
 - consider future needs

CEQA Process

- Who is responsible for CEQA
 - RB is the lead agency, stakeholders conduct the analysis
- What analysis is necessary
 - Supplemental Environmental Document
 - Programmatic SED
- When should the process begin
 - Once management alternatives have been identified
- When should the CEQA Scoping meeting be held
 - Early enough to allow for consideration of comments during SED development
- When should the documents be completed
 - Ideally the same time as the SNMP

CEQA Roles & Responsibilities

Task	Regional Board	Stakeholders
Lead Agency	Lead	
CEQA Scoping Meeting	Co-Lead	Co-Lead
Environmental Analysis	Oversight/Review	Lead
Document Review	Lead	
Response to Comments	Lead-Regulatory	Lead - Technical
Revisions	Oversight/Review	Lead
Public Hearing	Lead	
Project Level EIR		Lead

Tentative Schedule

- 2nd Annual SNMP Workshop: **TODAY**
- Guidance Document : **FEB 2012**
- 3rd Annual SNMP Workshop: **Nov 2012**
- Preliminary Draft SNMPS: **Nov 2013**
- 4th Annual SNMP Workshop: **TBD**
- Final Draft SNMPS: **MAY 2014**

SNMP Information

- Regional Board website:
 - www.waterboards.ca.gov/losangeles/water_issues/programs/salt_and_nutrient_management/index.shtml
- E-mail list subscription:
 - http://www.waterboards.ca.gov/resources/email_subscriptions/reg4_subscribe.shtml
- GAMA website:
 - www.waterboards.ca.gov/losangeles/water_issues/programs/sgama/geotracker_gama.html
- State Water Board website:
 - http://www.swrcb.ca.gov/water_issues/programs/water_recycling_policy/index.shtml

Outstanding Questions

- Soliciting additional questions and concerns not addressed by the presentation
- Responses will be provided during workshop or in guidance document in development