Salinity and the Water Board

Part 2

Applying the guidance memo to new and existing permits and WDRs

Central premise of the guidance memo:

Any salinity above background discharged to land or water increases the "inventory" of salt in the Region.

Considerations when drafting WDRs & Permits:

Instructions to Staff

- Numeric effluent limits
- Salinity minimization
- Anti-degradation analysis
- Time schedules for effluent limits

Numeric Effluent Limits

- Water quality based effluent limits
- Increment based effluent limits
  - Tulare Lake Basin Plan effluent limits
- Performance-based effluent limits
- TDS/EC or salt constituent(s)

Interim Effluent Limits

- Performance-based Interim Effluent Limits/Goals
- Increment-based Interim Effluent Limits/Goals

Salinity Minimization

Required for all discharges,
to the extent feasible.

- Salinity Source Reduction Report
- Implementation
- Reports to the Board
- Board review

Anti-degradation Analysis

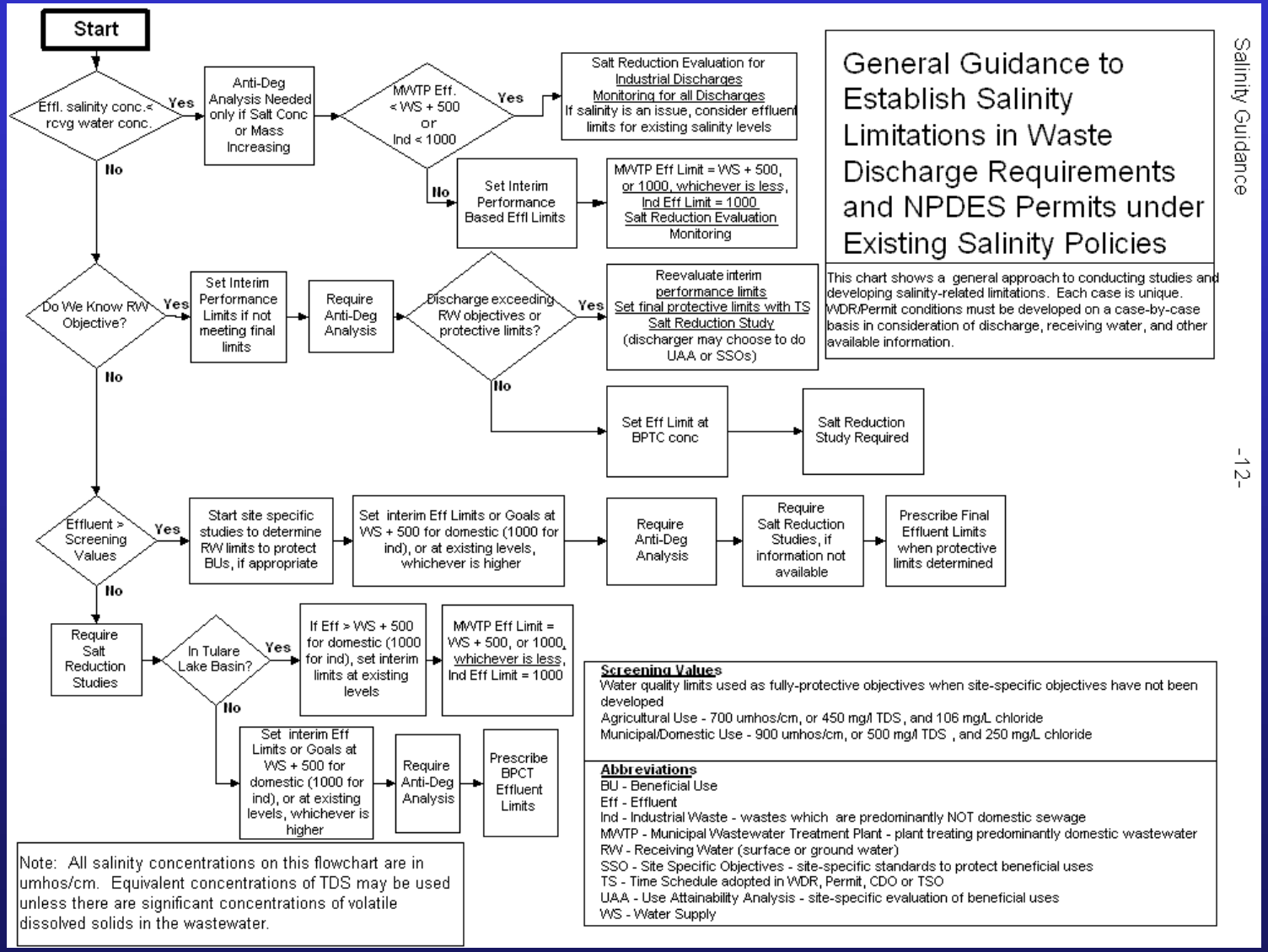
- Required if effluent salinity is greater than receiving water salinity, or if the mass or concentration of the salinity in the discharge increases.

- (Usually,) an additional anti-degradation analysis is not required if met by adoption of the Tulare Lake Basin Plan.

How long should it take?

- Studies and implementation begin immediately
- How long should implementation take?
  - Already working with discharger?
  - Multiple sources – different time tables
  - Do as much as you can as rapidly as you can

The Flow Chart



First Decision

- Is the effluent less salty than the receiving water?

Second Decision

- Do we know the receiving water salinity objectives?
  - Numeric objective in Basin Plan
  - Narrative objective interpretation
    - Site specific studies
- Adopt final effluent limits if objectives known
- Adopt interim limits and require studies if not known

Third Decision

- Is the effluent saltier than screening values for ag and mun uses?
- Yes
  - Start site specific studies, interim limits, salt minimization

No (fourth pathway)

  - No likelihood of impacting AG or MUN
  - No site specific studies
  - Set effluent limits and salt minimization

New dischargers

- Salt minimization and control
- Effluent limits will (usually) be effective immediately

Groundwater cleanups

If the only reasonable means of conducting the clean up will require discharge of treated water to lower salinity receiving water, the benefit of protecting the municipal water supply should be part of the anti-degradation analysis.

The discharge should not cause loss of beneficial use in the receiving water

Parting thoughts

Any salinity above background discharged to land or water increases the "inventory" of salt in the Region.

We need to deal with salt as quickly as reasonably as we can while we develop the new salt policy.