

## Meeting Notes

### Evaluation of the MUN beneficial use in Agriculturally Dominated Water Bodies

September 24, 2015

9:00 AM

**Location:** Central Valley Regional Water Quality Control Board Office, 11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670: Training Room

*Attendees:*

Agralogics – Kerry Beane (*by phone*)

California Rice Commission – Roberta Firoved

California Urban Water Agencies – Elaine Archibald

Central Valley Clean Water Association – Debbie Webster

Central Valley Water Board – Anne Littlejohn, Bethany Soto (*by phone*), Cindy Au Yeung, Heidi Bauer (*by phone*), Jeanne Chilcott, Patrick Pulupa, True Khang

Friends of the North Fork – Mike Garabedian (*by phone*)

Larry Walker and Associates – Mike Troughon

Merced County – Chris Soehnen (*by phone*)

Sacramento River Joint Source Water Protection Program – Bonny Starr, Elissa Callman

State Water Resources Control Board – Diane Barkley

Tulare Lake Basin Water Storage District – Mike Nordstrom (*by phone*)

Turlock Irrigation District – Debbie Liebersbach

## Meeting Summary

**Goal of meeting: Provide a project update and obtain stakeholder feedback on the development of a monitoring/surveillance program for the region-wide MUN evaluation process.**

### Project Update

- Project Update: Central Valley Water Board Staff provided a brief update on the project including:
  - General - Approval of Sacramento MUN POTW Basin Plan Amendment by State Board in August 2015
    - Regional Board staff is still waiting on the signed resolution and supporting documents from State Board.
  - Review action items/outcomes from September 3, 2015 stakeholder meeting
    - LIMITED-MUN definition and water quality objective language
      - Staff provided stakeholder feedback and other suggested options for a definition and water quality objective.
      - There was no consensus over the use of the words “maintain” and “intended” in the proposed definition.
      - Concern was expressed regarding the use of “trend of degradation” in one of the water quality objective options. Some stakeholders expressed the need for more clarification as to what an impact would be and how much would be allowed.
      - Other considerations regarding the use of “trends” include uncertainty over the effects of a drought versus degradation. A suggestion was made to add guidance into the implementation section.
      - While many stakeholders were in favor of the of the definition and water quality objective options developed during the September 3<sup>rd</sup> stakeholder meeting, staff agreed to include other distinct suggestions in their evaluation of options (in the Basin Plan Amendment Staff Report.)
  - Controlled Recirculation System – Application Report Outline

- Staff received feedback prior to the meeting from several stakeholders regarding the outlines for the seasonally-closed recirculation system and the year-round closed recirculation system.
- Suggestion was made at the meeting to clarify the language for the seasonally-closed system to ensure that all water bodies will be evaluated through the Flow Chart 1 categorization process
- Due to the time constraints, staff recommended that the issue be continued to a small-group stakeholder meeting in October 2015, focused entirely on the framework for the controlled recirculation systems

*Action Items:*

- *Anne Littlejohn will follow-up with stakeholders who have expressed an interest in the continued development of the controlled recirculation systems to schedule a meeting in October 2015.*

**Development of a Monitoring/Surveillance Program for Region-wide MUN Evaluation Process**

- General Question regarding wording in the Sources of Drinking Water Policy (Exception 2b): when it says that discharge needs to be monitored, is the discharge the water *before* it flows into the next water body or is it water *within* the downstream water body?
  - Staff explained that discharge was not defined in the policy. However, the intent of the policy was not to require that the excepted water body meet MUN water quality objectives, but that its discharge should not impact beneficial uses in downstream waters. This allows for the use of mixing zones and monitoring compliance sites in the downstream water body instead of potentially cost-prohibitive discharge modeling.
- Key Questions for the Monitoring Program
  - The proposed primary question for both NO MUN and LIMITED-MUN water bodies was: *Are relevant water quality objectives downstream being met?* Addition question for LIMITED-MUN water bodies was: *Are relevant water quality objectives within the water body being met?* Stakeholder comments were as follows:
    - In general, stakeholders agreed that these two questions were appropriate as the overarching monitoring questions.

- Suggestion was made to rephrase the first question to: *Are relevant downstream water quality objectives being met?*
- Activities needed to answer Monitoring Questions
  - In the meeting material, staff proposed a list of activities needed to answer the two main monitoring questions. Stakeholder comments and questions were as follows:
    - Concern that the activities were not listed in the right order.
    - Suggestion that a “Reasonable Potential Analysis (RPA)” type of evaluation should be done on the system first.
    - Replacement of “establish” with “define” for activities needed to answer monitoring question. Revised version: *Define a monitoring program downstream that includes identified constituents of concern.*
    - Be clear about what the State’s and applicant’s roles and responsibilities in the implementation of the monitoring program (e.g. Applicant submits district report and the State reviews the report, evaluates water quality in district and downstream, and develops monitoring program).
    - How far do we go downstream for a reasonable mixing zone?
      - Should this question be part of the staff evaluation?
    - Do we need to conduct a review of monitoring downstream of discharge up to the 1st MUN intake?
  - The San Luis Canal Company was used as a case study for the staff review document (provided as part of the meeting material). Stakeholder comments and questions were as follows:
    - Clarify that the document is reviewed by Central Valley Water Board staff.  
Revised version: *Central Valley Water Board Staff Evaluation of Water District*
    - Define water body categories in A.1 Table.
    - Add an additional option of “Reject All” for A.6. Staff Recommendation for Water Body Categorization Designations.
    - Table and description will need to be provided to adequately document suggested changes in A.6.

- Remove “If the answer was no for the first question...” in B.2. It is important to know the first downstream MUN diversion regardless if the district has or doesn’t have MUN diversions.
  - Suggest changing the wording in B.4 to provide clarity: *Are there any district water bodies that should not be considered in this process? If so, explain.*
  - A summary of constituents of concerns and any monitoring programs that cover those constituents should be added before best management practice question in C.1.c.
  - Consideration should be given to management plans and or TMDL programs that are already addressing specific constituents (e.g. EC and Boron in the Lower San Joaquin River).
  - What are some options for the district if monitoring data gaps have been identified? Proposed options from staff included:
    - Jointly support a water quality monitoring program to track constituents
      - May include representative monitoring sites
    - Individual monitoring
      - Surface Water Ambient Monitoring Program (SWAMP) compatible?
    - Data Modeling
- Other Questions and Issues - Stakeholder comments and questions regarding other monitoring issues included the following:
  - Coordination with other programs
    - Central Valley Water Board monitoring (e.g. SWAMP program) could be coordinated with the drinking water purveyors sanitary surveys every 5 years.
    - Dept. of Water Resources’ Coordinated Monitoring Program is an ongoing program that provides useful water monitoring data for sanitary surveys.
  - Follow-up actions/Triggers
    - It may be helpful to identify a liaison at the Central Valley Water Board for the purpose of notifying the water boards of any sudden water quality concerns.
  - Pesticides commonly don’t have objectives such as MCLs. How would they be included?

- There are USEPA guidance values and human health benchmarks for pesticides. ILRP also includes pesticide monitoring in their WDRs. However, there are many issues with the testing methodology and costs for pesticides.
  - Narrative objective in the Basin Plans for pesticides still apply.
- How would we address monitoring when there is a MUN intake directly downstream of an Ag drain (e.g. there is a new intake planned for Placer County directly downstream of Ag discharges in the Natomas area)
- How will we assess degradation and cumulative impacts? Will certain types of trend analyses or historical data reviews be required?
- If a downstream water body is listed as a 303(d) water body, could this impact the MUN evaluation process in the upstream Ag dominated water body if they are a contributing source?
- A lot of work was done for the Central Valley's Drinking Water Policy – staff should consider some of the ideas from that policy for this MUN evaluation process.

*Action Items:*

- *An update to the San Luis Canal Company review document will be sent out to stakeholders in October 2015.*

**Discuss Project Schedule and Future Meetings**

- Sacramento POTW Basin Plan Amendment
  - As soon as Regional Board staff receives the necessary documents from State Board, they will submit a package (Administrative Record) to the Office of Administrative Law (OAL) and US EPA. OAL has a six week review period. This is followed by the US EPA review period – which includes two months to approve the amendment and three months to not approve.
- Region-wide MUN Process Basin Plan Amendment
  - As stated in the first section, a smaller group meeting will be scheduled for later in October 2015 to specifically discuss issues pertaining to recirculation systems.
  - Staff is working on a draft Staff Report scheduled to be available in early part of 2016. A Board workshop will be held in mid-2016.

- Additional stakeholder meetings will be scheduled as needed.

*Action Items:*

- *Meeting notes for the September 24<sup>th</sup> meeting will be posted to the website*
- *Anne Littlejohn will send out project updates as needed to the project Lyris list*