

STATE WATER RESOURCES CONTROL BOARD
RESOLUTION NO. 92-66

APPROVAL OF THE SECTION 106 SURFACE WATER POLLUTION
CONTROL GRANT WORKPLAN FOR FEDERAL FISCAL YEAR (FFY) 1993
AND AUTHORIZATION TO APPLY FOR AND ACCEPT THE SECTION 106
SURFACE WATER POLLUTION CONTROL GRANT FOR FFY 1993

WHEREAS:

1. The State Water Resources Control Board (State Water Board) is applying to the U.S. Environmental Protection Agency, Region 9, for a Clean Water Act, Section 106 Grant in the amount of \$3,953,348 for FFY 1993.
2. The Section 106 Grant for surface water pollution control programs assists the State Water Board in financing the implementation and maintenance of adequate measures for the prevention and abatement of water pollution, pollution control studies, and compliance and enforcement activities.

THEREFORE BE IT RESOLVED:

That The State Water Board:

1. Approves the FFY 1993 Section 106 Surface Water Pollution Control Grant Workplan.
2. Authorizes the Executive Director or his designee to apply for and to accept the FFY 1993 Section 106 Surface Water Pollution Control Grant in the amount of \$3,953,348 to assist in financing the State's water pollution control programs.

CERTIFICATION

The undersigned, Administrative Assistant to the Board, does hereby certify that the foregoing is a full, true, and correct copy of a resolution duly and regularly adopted at a meeting of the State Water Resources Control Board held on August 20, 1992.

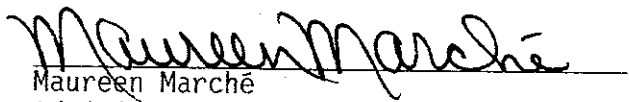

Maureen Marché
Administrative Assistant to the Board

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Final version dated August 7, 1992

P R O L O G U E

Section 106, Clean Water Act
Water Pollution Control Program Grant

Workplan
for
Federal Fiscal Year 1993

California State Water Resources Control Board
and
California Regional Water Quality Control Boards

In 1967, the California Legislature devised a unique coordinated adjudicatory and regulatory framework to manage California's most vital natural resource, water. Within this framework, the State Water Resources Control Board (State Water Board) and the nine California Regional Water Quality Control Boards (Regional Water Boards) were entrusted with broad authority to preserve, protect, and enhance all beneficial uses of the State's streams, rivers, lakes, coastal waters, and ground water basins.

Managing California's complex waterscape encompasses many responsibilities and challenges, including implementing and administering major new federal water pollution control legislation and programs. Since the early 1970s, the State Water Board and the U.S. Environmental Protection Agency (EPA) have acted jointly in many instances to control inadequately treated sewage and industrial discharges into surface waters, to award grant assistance so that municipalities could build better pollution control works, and to establish a cooperative regulatory system so that similar State and federally mandated duties would be effectively and efficiently performed. EPA delegated its significant water quality programs and activities to the State Water Board in 1975 and currently contributes approximately \$3.9 million or about 6 percent of the State Water Board's water quality budget to finance a portion of the delegated activities through the annual Section 106 Water Pollution Control Program Grant.

Although substantial amounts of surface water pollution have been abated, a wide array of pollutants continue to impact California's ground and surface waters. At the same time, both water quality and water supply concerns, complex beneficial use considerations, expanding technical information and knowledge, and limited financial resources have presented difficult challenges to the State Water Board. To tackle such challenges, the nine Regional Water Boards and the State Water Board have acquired diverse staff expertise, have undertaken major new programs, and have shifted the Regional Water Boards' water quality protection and pollution control emphasis from technology-based water quality standards and protection to water quality-based standards and levels of protection.

As the State Water Board's focus has changed, federal water pollution control (Section 106) program responsibilities have similarly expanded and the emphasis has shifted. Water-borne diseases associated with poorly treated sewage have been virtually eradicated, but pollutants such as toxic materials present different threats to public health and natural resources in California. The State Water Board's water pollution control (Section 106) program agreement with EPA reflects the recent enactment of federal laws and programs to correct and prevent such threats. In fact, workplans in recent years have incorporated many activities mandated by the 1987 amendments to the Clean Water Act (CWA). Despite substantial change, the present amount of federal grant assistance for this program remains virtually unchanged from the original 1975 award. EPA now contributes about \$3.9 million--or less than 6 percent of California's water quality program. These grant monies now directly support less than half of the State and Regional Water Boards' National Pollutant Discharge Elimination System (NPDES) Program. The State Water Board's grant workplan specifies particular activities, performance criteria, and work products for certain program elements. During Federal Fiscal Year (FFY) 1993, these program elements generally include NPDES permitting, trend

monitoring, quality assurance, water quality standards, compliance and enforcement, and pretreatment activities.

The surface water pollution control (Section 106) program grant and workplan represent only a small portion of the State Water Board's entire mission. The various non-surface water regulatory programs--Resource Conservation and Recovery Act (RCRA), Toxic Pits Control Act (TPCA), Solid Waste Assessment Test (SWAT), Subchapter 15 Waste Discharge Requirement (WDR), Unregulated Sites, and Underground Tanks perform extensive ground water investigations and monitoring, conduct regulated facility compliance or site-related inspections, and take necessary enforcement measures. These programs also clean up long-term pollution problems. Similarly, the State Water Board's Proposition 65, Forest Activities, Nonpoint Source, Risk Assessment, Pesticide, Section 205(j), Basin Planning, and Statewide Standards programs develop water quality protection criteria, coordinate water quality information, and formulate implementation schemes.

I. ADMINISTRATION

Scope

The State Water Board and the Regional Water Boards jointly administer and implement the Section 106 Water Pollution Control Program. The State Water Board has the lead responsibility for program administration. The State Water Board has implemented a State Clean Water Strategy (CWS) which provides the framework for determining both the State's priority waterbodies and the allocation of resources for assessment, prevention, and cleanup of pollution.

Authority

Clean Water Act, Section 106, and California Water Code, Division 7.

Objectives and Tasks

- A. To provide for management and evaluation of the California Water Pollution Control Program:
1. The State Water Board will perform general management of the Section 106 program. The EPA will provide program guidance and negotiate priorities for federally mandated programs with the State Water Board.
 2. The State Water Board will maintain its oversight of the Regional Water Boards in all relevant CWA planning, NPDES permitting, pretreatment, compliance, and quality assurance programs. The State Water Board will continue to submit quarterly 106 program tracking reports to EPA.
 3. Except where specifically noted herein, the State Water Board will provide EPA with quarterly reports detailing and summarizing activities and progress on workplan commitments specifically for the NPDES program. These reports will be submitted within 45 days after the end of the quarter.
 4. The State Water Board will participate with EPA in an end-of-year review of the FFY 1992 program in November 1992. The EPA will provide a written draft report on which the State Water Board will have a 30-day opportunity to comment.
 5. The State Water Board and EPA will maintain current regulations, procedures, and agreements. The State Water Board and EPA will ensure that each other receives copies of regulations, procedures, and agreements as they are developed and implemented.
 6. State Water Board executive management and EPA management will conduct meetings (Fairfield meetings) on a monthly basis to discuss program goals and accomplishments and to resolve problems identified, but not resolved, at mid-level meetings between State Water Board management from the Division of Water Quality and EPA mid-level management. These mid-level meetings will be held approximately monthly, about one week before a Fairfield meeting.
 7. The State Water Board and EPA may negotiate changes to appropriate portions of this workplan based on decisions reached at mid- or high level management meetings. Such changes will be implemented after approval by both the State Water Board and EPA.
 8. Although all tasks and outputs in this workplan are important and are expected to be completed, outputs identified as Strategic Tasking and Results System (STARS) commitments are recognized as EPA's highest priorities. The State Water Board will make efforts to ensure that the tasks and outputs are completed. This agreement recognizes that federal 106 funding comprises approximately 6 percent of California's total water quality control program. Inasmuch as the State's commitments in this workplan are affected by its resource constraints, priorities, and legislative mandates, the State can only, in good

faith, commit to its best efforts in achieving these commitments. The State Water Board will meet with EPA for the purpose of negotiating revisions to commitments if it appears to either EPA or the State Water Board, from the quarterly tracking reports or other sources, that such commitments have not or will not be met.

9. To the extent possible, the FFY 1994 106 Program Grant will be negotiated and awarded according to the following schedule:

	<u>Activity</u>	<u>Time Frame</u>
a.	Notify State Water Board of planning target	03/30/93
b.	Provide program guidance to State Water Board	04/15/93
c.	Negotiate workplans	05/01 - 07/01/93
d.	Final draft workplan	07/15/93
e.	Workplan/application to EPA for approval	08/15/93
f.	EPA approves workplan	10/01/93
g.	EPA awards 106 grant	11/30/93
h.	EPA awards letter of credit	12/15/93
10.	EPA will inform the State Water Board of any unanticipated additional funds if they become available for water quality management work and will solicit State Water Board input for their use. This notification will occur by telephone within one week from the time that EPA, Region 9 learns of the availability of the funds. It will be followed immediately by written notification. EPA will coordinate with the State Water Board on all requests for preparation/submission of grant proposals.	
11.	This workplan and the Section 303(d) list of impaired water bodies delineate priority activities which are agreed upon by both the State and EPA. Many of these activities are acknowledged to be underfunded. The State Water Board will identify underfunded activities and the required resources by November 6, 1992. EPA agrees to give these listed activities highest priority for consideration as appropriate funds become available, such as Section 104, 106, 319, Near Coastal Waters Initiative, etc.	
12.	In order to assure that EPA and the State Water Board properly coordinate CWA regulatory activities, EPA will provide the State Water Board with a comprehensive FFY 93 calendar containing scheduled CWA regulatory and other relevant activities, such as promulgation dates, deadlines, comment dates, etc.	

II. NPDES PERMITTING

Scope

The State Water Board and the Regional Water Boards jointly administer the NPDES permitting activities of the State's Water Quality Program. Tasks include preparation, review, issuance, reissuance, and revision of NPDES permits and review and approval of new and modified municipal pretreatment programs.

Tasks

- A. Permit Issuance

The Regional Water Boards will issue new and reissue existing NPDES permits regulating waste discharge to surface waters according to the current NPDES Memorandum of Agreement (MOA).

1. EPA will submit the proposed FFY 1994 California Major Discharger List to the Regional Water Boards for their review and comment by August 15, 1993. The Regional Water Boards will have thirty days for comment. EPA will provide the State Water Board and the Regional Water Boards with the revised major discharger list for FFY 1993 as soon as revisions are made to EPA's Permit Compliance System (PCS) data base.
2. The Regional Water Boards will issue new and reissue existing NPDES permits in accordance with the following priorities (in descending order):
 - a. Issuing new NPDES Permits;
 - b. Reissuing or rescinding major NPDES permits which expired prior to October 1, 1992, with priority given to permits which must be reissued to meet water quality goals;
 - c. Reissuing or rescinding major NPDES permits expiring subsequent to October 1, 1992, with priority given to permits which must be reissued to meet water quality goals;
 - d. Reissuing or rescinding minor NPDES permits which expired prior to October 1, 1992, with priority given to permits which must be reissued to meet water quality goals;
 - e. Reissuing or rescinding minor NPDES permits expiring subsequent to October 1, 1992, with priority given to permits which must be reissued to meet water quality goals.

The projected NPDES permit reissuance workload for State fiscal year (SFY) 1992-93 is shown in Attachment One to this workplan. Because permit reissuance is constrained by limited resources and competing activities, EPA has agreed to allow the Regional Water Boards to administratively continue minor NPDES permits under specific conditions. The overall goal is to eliminate backlogs and to reissue all major permits and at least 90 percent of minor permits as they expire. Because of the increasing workload associated with issuing new NPDES permits, it is agreed that EPA will give equal weight to both new and reissued permits when assessing the State's permitting performance. The State Water Board will provide EPA on a quarterly basis with a listing of the projected reissuance schedule and actual reissuance dates for major and minor NPDES permits which are backlogged or expiring in FFY 1993. The State Water Board will submit to EPA, by October 15, 1992, a strategy for reducing the current backlogs of expired NPDES permits and for preventing future backlogs, through use of general permitting, watershed approaches, administrative extensions, evening out the permitting workload from year to year, or State Water Board assistance. (STARS)

3. The Regional Water Boards will give priority to developing and issuing general NPDES permits wherever this action will result in permitting resource savings. EPA and the State Water Board will assist in developing model general permits for statewide use.
4. The Regional Water Boards will reopen NPDES permits or reissue NPDES permits upon expiration, in accordance with regulations, to incorporate water quality-based limits derived from studies required by the Regional Water Board at the time of last permit issuance.
5. By April 1, 1993, the State Water Board will develop model generic pollution prevention provisions to be added to all large municipal NPDES permits as they are reopened or reissued. The provisions will be coordinated with the storm water permitting program to eliminate

duplication and will provide for a flexible response to dischargers with a history of noncompliance. The provisions will be developed in concert with the need to reduce additional staffing needs for both the dischargers and the Regional Water Boards to implement the provisions.

6. The San Francisco Bay Regional Water Board will continue its pollution prevention efforts in support of implementation of the Comprehensive Conservation and Management Plan for the San Francisco Estuary Project.
7. EPA will provide the Regional Water Boards, and the Regional Water Boards agree to use, copies of the most current NPDES application forms and instructions for their use.
8. The State and Regional Water Boards will begin implementation of a storm water discharge regulatory program, focussing efforts in FFY 1993 on working with the permitted urban areas. NPDES storm water permits will be developed and issued for all remaining smaller urban areas required to have a permit. The Regional Water Boards will develop, as appropriate to their individual situations, general NPDES storm water permits for specific types of industrial and construction activities. The State Water Board will provide EPA with a copy of its SFY 1992-93 storm water program workplan. The State Water Board will provide EPA, as requested, with inventories of the individual industrial and construction activities dischargers who are registered under the general NPDES storm water permits and of the urban areas which have submitted Part II applications or who have been permitted.

B. Sludge Handling, Monitoring, and Reporting

1. Where NPDES permits for publicly owned treatment plants have been reopened or reissued, the Regional Water Boards will include needed toxics controls, sludge handling, monitoring, and reporting provisions, including the model sludge language of the approved interim sludge management program, and new pretreatment language, as appropriate.
2. For all new or reissued NPDES permits for dischargers generating sludge, the State Water Board and the Regional Water Boards will include:
 - a. Requirements to comply with existing federal sludge regulations and with new requirements promulgated pursuant to Clean Water Act (CWA) Section 405(d) and requirements listed in 40 Code of Federal Regulations (CFR) 122.41.
 - b. Cross-reference to the existing waste discharge orders written for sludge disposal facilities which impact the permitted facility.
 - c. Numerical limits for sludge and requirements for sludge monitoring and reporting.
 - d. Specific case-by-case sludge permit language, to be provided by EPA, into the permit. The EPA-issued language will supplement the model sludge permit language issued by the Division of Water Quality on March 28, 1990.

C. CWA Section 301(h) Marine Modified Permits

As appropriate, the Regional Water Boards and EPA will follow the procedures set forth in the May 1984 CWA Section 301(h) Memorandum of Understanding "Modified NPDES Permits Under Section 301(h) of the Clean Water Act Between the California State Water Resources Control Board and the U.S. Environmental Protection Agency, Region 9" and also the 1989 NPDES Memorandum of Agreement.

D. Review of Pretreatment Programs

The Regional Water Boards will review, as appropriate, both new and modified pretreatment programs for municipal NPDES dischargers. Copies of reviewed pretreatment programs will be provided to EPA and the State Water Board. The Regional Water Boards will issue approvals of both new and modified pretreatment programs and take full responsibility for the Pretreatment Program.

E. New Program Areas

1. The State Water Board and the Regional Water Boards will continue their previous efforts in permitting drydocks, shipyards, and boatyards, and in controlling the discharge of Tributyltin to near coastal waters, bays, and estuaries.
2. The State Water Board will continue to implement its Combined Sewer Overflow permitting strategy.
3. The State Water Board and the Regional Water Boards will work with the Integrated Waste Management Board and EPA with the objective of developing a unified permitting system for sludge to eliminate the need for publicly owned treatment works to obtain multiple permits for sludge treatment facilities or sludge reuse/disposal facilities.
4. The Regional Water Boards will complete the remaining Individual Control Strategies (ICS) for pollutant sources to water bodies on the 304(1) "short" list submitted to EPA by the State Water Board in February 1989.
5. The State Water Board and the San Francisco Bay Regional Water Board will work with the San Francisco Estuarine Institute to develop an ambient monitoring program for the San Francisco Bay and Estuary.

III. MONITORING AND ASSESSMENT

Scope

For the purposes of this workplan, "monitoring and assessment" is broadly defined as activities conducted to provide chemical, physical, geological, biological and other water quality-related data and to assess impacts on beneficial uses of water bodies based on such data.

Goals

The goals for the State and Regional Water Boards' monitoring and assessment programs are:

1. Determine where water quality problems exist, the sources or causes, and rank or prioritize the problems on a statewide basis.
2. Determine pollutant-related changes in the quality of water bodies in the State;
3. Ensure that all monitoring data are technically and scientifically sound through operation of an appropriate quality assurance program;
4. Develop more effective monitoring and assessment techniques;
5. Determine if the objectives of the Inland Surface Waters Plan and the Enclosed Bays and Estuaries Plan are being met.

Strategy

The State and Regional Water Boards will operate ambient water quality monitoring programs and perform special studies and intensive surveys to acquire water

quality data, evaluate such data, and support conduct of follow-up actions in problem areas to solve problems and reduce pollution. The State Water Board will provide water quality status information and reports for basin plan updates, for 304(l) water quality assessment plans, and for the CWA Section 305(b) Biennial Water Quality Assessment report.

Tasks

- A. The State Water Board will operate routine ambient monitoring programs which collect and analyze samples of water, tissue, and sediment, as appropriate in individual situations, and will make such data available to EPA and the Regional Water Boards in either electronic or hard copy report form.
- B. The State Water Board's review of portions of its statewide ambient monitoring programs will continue to integrate monitoring, assessment, and standards setting through the State's CWS by linking such activities to the prioritization and decision making processes that are generated by the CWS.
- C. In an effort to keep EPA aware of accomplishments made by the State, the State and Regional Water Boards will participate in an EPA monitoring review, as needed.
- D. The State Water Board will provide guidance to the Regional Water Boards for evaluating waterbodies on the 303(d) list as to the feasibility of applying Total Maximum Daily Load/Waste Load Allocation/Load Allocation (TMDL/WLA/LA) procedures. Where TMDL/WLA/LAs do not appear appropriate, the State Water Board will identify alternative control measures that may be applied. These procedures may include, but are not limited to, mass emission controls or other innovative approaches to control pollutants to meet water quality standards.
- E. By April 1, 1993, The State Water Board will review its progress in implementing its Action Plan for performing TMDL/WLA/LAs, and its agreement with EPA on the TMDL implementation process. (The Action Plan and process agreement were scheduled for completion in FFY 1992). The State Water Board will meet with EPA to review Action Plan implementation and to identify Plan components that need to be modified. This review will address, but need not be limited to:
 1. Water body listing and targeting procedures, criteria, and results,
 2. TMDL/WLA/LA minimum requirements and criteria,
 3. Progress in developing specific TMDLs for targeted water bodies, and
 4. Adequacy of public participation elements of TMDL processes.Based on this review, the State Water Board will modify the Action Plan and negotiate modifications to the process agreement with EPA, as needed. Changes in the process agreement require EPA concurrence.
Where Regional Water Boards have defined TMDLs with multiple dischargers, they will each begin work on at least one TMDL involving multiple dischargers or nonpoint source discharges in FFY 1993.
- F. In order to assist the State and Regional Water Boards in achieving their Monitoring and Assessment goals:
 1. On an ongoing basis, EPA will assemble an inventory of available reports and identify ongoing work or planned activities in the following areas.
 - a. Assessing or estimating the effects of toxic organic or metallic priority or other pollutants on humans, animals, fish, and plants.
 - b. Guidelines for interpreting and using water quality-related environmental data.

- c. Bioscreening techniques.
 - d. Beneficial use attainability.
 - e. Improved monitoring techniques and sampling methods to address existing and emerging problems in the area of toxic pollutants in both surface and ground waters.
2. EPA will use the State's Clean Water Strategy (CWS) to focus its own project priorities, consistent with the State's Water Quality Assessment (WQA).
- G. In updating the CWS/WQA, the Regional Water Boards will identify segments which are not "fishable/swimmable" and will identify the causes of such situations, consistent with Sections 303(d) and 304(l). The State Water Board will specify the definition of "fishable/swimmable" used in this process.
 - H. The State Water Board will work with EPA to develop mechanisms for sharing state and federal water quality databases, including Geographic Information System databases. The purpose of this activity is to assist in development of water quality monitoring assessments.
 - I. The State Water Board will cooperate with EPA in its Water Quality Storage and RETrieval System (STORET) modernization process and will attempt to link the State Water Board's water quality assessment database with EPA's water body system. EPA will keep the State Water Board informed of any changes to STORET and related systems resulting from the STORET modernization process.
 - J. The State Water Board and Regional Water Boards 4, 8, and 9 agree to participate with EPA in development of a regional monitoring program for the southern California bight, including a program for coastal publicly owned treatment works (POTWs).
 - K. The State Water Board will provide staff resources, on an ongoing basis, for assessment of the status of attainment of designated beneficial uses in California waters, as part of the Section 305(b) report process.

IV. QUALITY ASSURANCE

- A. The State Water Board will operate a statewide quality assurance (QA) program to assure the precision, accuracy, completeness, representativeness, and comparability of water quality data gathered by State and Regional Water Board monitoring programs. The QA Program will be operated in accordance with the State Water Board and EPA approved QA Program Plan.
- B. The State Water Board will submit a written report on the status of implementation of its FFY 1992 QA Program by November 15, 1992. The following elements will be included in the annual QA Program status report.
 - 1. A description of any changes to the QA Program and the status of such changes, including short or long-term goals, environmental measurement activities, organization and personnel, and training.
 - 2. The status of QA Project Plans approved or required by EPA, their adequacy and applicability to current EPA-funded programs, and the need for revision.

3. Significant QA Program accomplishments, problems, and the resolution of problems.
4. The development, use, and attainment of data quality objectives for measurement activities.
5. The development of standard operating procedures to encourage uniform practices.
6. A summary of any projects or special studies for which QA Project Plans were prepared and/or reviewed, including significant problems and recommendations for actual or procedural changes in the projects or studies.
7. The results of any performance or system audits conducted.
8. Any other QA activities or concerns.

V. PLANNING AND STANDARDS

Scope

The State Water Board is the lead agency in California to ensure a consistent statewide approach for planning to maintain, protect, and, where possible, improve water quality. The Regional Water Boards develop and adopt Water Quality Control Plans (basin plans) and updates of plans which include water quality standards (WQS). The State Water Board adopts statewide water quality control plans, which also include WQS.

Tasks

A. Water Quality Planning

1. By April 15, 1993, the State Water Board will submit a schedule, including proposed content and priorities for various activities, for triennial reviews of basin plans. The triennial review schedule and contents will be coordinated with the State's CWS/WQA update which served as the prioritization component of the triennial review.

B. Water Quality Standards

1. The State Water Board will continue the process of developing appropriate criteria/limits for other toxic pollutants of concern.
2. EPA, the State Water Board, and the Regional Water Boards will continue, through the Use Attainability Analysis (UAA)/Site-Specific Standards Workgroup, to develop and provide guidance on how to develop use attainability analyses and site-specific standards.
3. The State Water Board will consider convening a special workgroup to address wildlife criteria related to UAA/Site-Specific Standards.
4. The State Water Board will provide EPA with a copy of the approved workplan and schedules and will keep EPA informed on the status of development of site-specific standards in category a, b, and c waters.
5. The State Water Board will initiate studies leading to a guidance document on implementation of toxicity reduction requirements.

6. EPA will make best efforts to provide specific guidance to the State Water Board on implementation of metals criteria, with technical documentation to adequately support the guidance.

VI. COMPLIANCE AND ENFORCEMENT

Scope

The nine Regional Water Boards and the State Water Board's Division of Water Quality administer the compliance and enforcement activities of the State's water quality program.

Authority

CWA, Section 309, and California Water Code, Division 7.

Goals

Specific goals of the program are to:

1. Be able to determine at any time the status of compliance of all NPDES permitted dischargers in California.
2. Implement EPA's National Municipal Policy.
3. Assess appropriate penalties for violators.
4. Ensure that all pretreatment programs are in compliance with all applicable requirements.
5. Reduce the number of dischargers in noncompliance.

Strategy

The State and Regional Water Boards will implement compliance and enforcement provisions of the 1989 NPDES Memorandum of Agreement and the State/EPA Enforcement Agreement, the California Compliance Policy, and California's Enforcement Management System (EMS).

Tasks

- A. To ensure that the State is maintaining an effective compliance and enforcement program:
 1. During FFY 1993, EPA and the State Water Board will review their EMS for mutual consistency.
 2. To ascertain whether funding is being directed to resolving compliance issues at federal facilities, the Regional Water Boards will review the annual A-106 federal facility compliance list to be provided by EPA. The review will be completed within 30 days of submittal of the list by EPA.
 3. The Regional Water Boards will conduct compliance and enforcement activities for NPDES facilities; inspections will be conducted in conformance with the 1989 NPDES MOA.
- B. To identify NPDES permit violations through Discharger Monitoring Report (DMR) Review:
 1. The Regional Water Boards will review all major NPDES discharger DMRs within 30 days of receipt and will attempt to review minor discharger DMRs quarterly.
 2. When letters or other less formal enforcement actions have failed to gain participation, either EPA or the Regional Water Boards will take

appropriate enforcement actions against NPDES major permittees that have failed to participate in EPA's DMR Quality Assurance Program.

C. To monitor noncompliance through the Quarterly Noncompliance Reports (QNCR):

1. In accordance with Attachment Two "Schedule For Submittal Of QNCR And Follow-up Activities", the Regional Water Boards will report quarterly all major NPDES dischargers in either significant or reportable noncompliance (SNC, RNC) on the QNCR (40 CFR, Section 123.45). Federally funded NPDES minors will be reported at least semiannually.
2. EPA will provide review comments on the QNCRs submitted by the Regional Water Boards directly to the appropriate Regional Water Board. Corrections will be made on the following QNCR.
3. EPA will direct its Enforcement Target Letters, with comments on dischargers in SNC more than one quarter, to the State Water Board, which will take responsibility for coordinating responses. The responses will include compliance dates and schedules, as appropriate, so that EPA can determine if action should be taken by EPA in lieu of a Regional Water Board.

D. To identify NPDES discharger compliance problems through inspections:

1. The Regional Water Boards will conduct compliance inspections at least once during the SFY for all major NPDES dischargers and at least once during the five-year term of the permit for all minor NPDES dischargers. To the extent that resources allow, the Regional Water Boards will conduct additional inspections, as appropriate, of major and minor NPDES permittees. The SFY 1992-93 NPDES discharger compliance inspection commitments are shown in Attachment Three to this workplan. The State Water Board will report to EPA quarterly on the scheduled and actual dates of compliance inspections of all NPDES facilities. The quarterly reports will include a reconciliation of the computer listing with actual inspection data provided by the Regional Water Boards. The State Water Board will submit an additional report by May 10, 1993 of all major NPDES permittees which will not be inspected by June 30, 1993. (STARS)
2. To avoid duplication of effort, EPA will make every effort to conduct compliance inspections of only those NPDES permittees which will not be inspected by the Regional Water Boards (A or B level inspections, including pretreatment inspections). This does not restrict EPA's right to conduct inspections as deemed necessary. EPA will notify the Regional Water Boards at least 14 days prior to these inspections in order to allow Regional Water Board staff to participate or to conduct such inspection in lieu of EPA by mutual agreement. EPA will provide final inspection reports to the Regional Water Boards within 60 days after an inspection is performed.
3. The Regional Water Boards will submit copies of inspection reports, using the new compliance inspection report form meeting both State and EPA requirements, to the State Water Board within 30 days after a nonsampling inspection and within 60 days after a sampling inspection.
4. In general, the State and Regional Water Boards will follow the procedures in the 1989 NPDES MOA and the State's Administrative Procedures Manual (APM) for compliance inspections.

E. To achieve and maintain compliance through adoption of formal enforcement actions:

1. In accordance with the procedures specified in the 1989 MOA, EPA will notify the State Water Board and the appropriate Regional Water Board of any enforcement actions proposed to be taken by EPA.
2. The State Water Board will report to EPA, by the seventh day after the end of each quarter, mutually agreed upon information on the following

types of enforcement actions which are reportable under the provisions of the CWA.

- a. Cleanup and Abatement Orders and Cease and Desist Orders issued in the quarter.
- b. Referrals to the State Attorney General in the quarter.
- c. Referrals filed in State court in the quarter.
- d. Criminal actions filed in State court in the quarter.
- e. Administrative Civil Liability Complaints (ACLC), including the amounts assessed and collected, and appropriate dates.

Actions which are reportable include those issued for discharges subject to the CWA, whether permitted or not, including both point sources discharging to surface waters and indirect industrial dischargers into POTWs. Pursuant to the 1989 MOA, Regional Water Board enforcement actions will contain reference to specific provisions of the CWA which have been violated. The Regional Water Boards will transmit copies of all adopted enforcement actions reportable under the CWA within fifteen days after adoption. (STARS)

3. The State Water Board will develop a tracking system for monetary penalties assessed and paid and will report quarterly to EPA in a mutually acceptable format.
4. The State Water Board will review and evaluate the methods used by the Regional Water Boards to track compliance schedules and will report to EPA on the feasibility of developing and implementing a tracking system by April 1, 1993.

F. To ensure compliance with the requirements of approved pretreatment programs, the Regional Water Boards will conduct pretreatment on-site visits and prepare reports, according to the provisional schedule in Attachment Four to this workplan. Changes to the schedule in Attachment Four due to resource constraints and annual NPDES Program workplan adjustments will be submitted to EPA by the State Water Board by October 15, 1992. The State Water Board will also submit to EPA, by May 10, 1993, a list of those scheduled pretreatment on-site visits which will not be performed by June 30, 1993. The Regional Water Boards will also review annual and quarterly pretreatment reports and ensure, through informing the discharger of deficiencies and enforcement action as appropriate, that the POTW takes appropriate action to comply with requirements. The Regional Water Boards will take appropriate follow-up action on any POTWs that fail to submit quarterly or annual reports.

1. The Regional Water Boards will complete reports on comprehensive on-site evaluations within 90 days of the date of the site visit. The State Water Board and EPA will provide comments to the Regional Water Boards on draft reports within 15 working days from the date of mailing by the Regional Water Board. Failure by the State Water Board or EPA to provide comments within 15 working days will be considered as State Water Board or EPA concurrence with the report.
2. Annual pretreatment report reviews and comprehensive on-site evaluation reports will include completed Water Enforcement National Data Base (WENDB) data element forms.
3. The Regional Water Boards will perform annual pretreatment report reviews and submit their responses to the discharger, the State Water Board, and EPA within 60 days of receipt of such reports.
4. The Regional Water Boards will submit on-site visit reports to the discharger, with copies to the State Water Board and EPA, within 60 days of the on-site visit.

5. The Regional Water Boards will follow up on completed evaluation reports within 60 days of issuance of the report to ensure that POTWs will implement the required corrective actions. Corrective actions should be completed within one year of issuance of the final report. Enforcement actions, if required, will be consistent with the State's APM.
6. Two weeks after the end of each quarter, the State Water Board will provide EPA an updated list of pretreatment on-site visits and evaluations conducted and reported upon since July 1, 1992. The State Water Board will also provide EPA with a quarterly update of the October 15, 1992 schedule of on-site visits and reports.
7. EPA may conduct pretreatment on-site evaluations, as necessary. EPA will notify the Regional Water Board pretreatment coordinator and the State Water Board 15 days prior to an on-site visit. EPA will provide the State and Regional Water Boards with final reports within 60 days after the on-site visit.
8. POTW pretreatment-related noncompliance will be incorporated into the QNCRs using the criteria in the "FFY 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements", September 27, 1989, or subsequent revisions.

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION ONE

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0024449	City of Eureka - Elk River POTW	No				x
CA0005622	PG&E - Humboldt Bay P.P.	Yes	x			
CA0005886	Louisiana Pacific - Fort Bragg	Yes	x			
CA0005606	Masonite Corp. - Ukiah Mill	No				x
CA0022748	City of Rio Dell	No				x
CA0022730	City of Fortuna	No				x
CA0022721	City of Ferndale	No				x
<u>MINORS</u>						
CA0023981	Louisiana Pacific Corporation	Yes				x
CA0024040	County of Mendocino - Anchor Bay	Yes				x
CA0006017	Pacific Lumber Company - Scotia	Yes				x
CA0023655	Apple Time Company	Yes				x
CA0024465	Stone Container Corp.	Yes				x
CA0024538	Pacific Lumber Company - Carlotta	Yes				x
CA0024481	California Fish Growers	Yes				x
CA0005860	Louisiana Pacific - Potter Valley	Yes				x
CA0024589	Hewlett-Packard	Yes				x
CA0024058	Sonoma Co. DPW - Russian River SD	Yes				x
CA0024546	Trinity River Lumber Company	Yes				x
CA0024490	McKinleyville CSD	Yes				x
CA0023574	Covelo CSD	No				x
CA0024503	Hi-Ridge Lumber Company	No				x
CA0023051	Sonoma County DPW	No				x
CA0024171	Harwood Products - Branscomb Mill	No				x
CA0024597	Schmidbauer Lumber	No				x

Source: DPS 6483/8118

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION TWO

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0005002	US Steel, Posco Plant	No				x
CA0038091	City of Benicia	No			x	
CA0006165	Rhone-Poulenc	Yes	x			
CA0038547	Delta-Diablo SD	No			x	
CA0037575	Napa SD	No				x
CA0037770	Mountain View SD	No		x		
CA0006343	Marine Magnesium	No	x			
CA0028070	San Francisco Airport Industrial	No	x			
CA0037834	City of Palo Alto	Yes		x		
CA0037842	City of San Jose/Santa Clara WPCP	Yes		x		
CA0037621	City of Sunnyvale	Yes		x		
CA0038369	South Bayside System Authority	No				x
CA0038415	SF Westside Wet Weather CSO	No	?			
CA0004961	Tosco Corporation	No				x
CA0005134	Chevron Richmond Refinery	Yes	x			
<u>MINORS</u>						
CA0038539	City of Richmond WPCP	No				x
CA0005797	Shell Oil Stormwater	No		x		
CA0006220	Pilot Petroleum Corporation	No		x		
CA0038351	Bay Farm Island Rec. Dist.	Yes	x			
CA0038440	EBMUD Wet Weather Bypass	Yes	x			
CA0038580	City of Hercules	No			x	
CA0038644	Napa River Rec. Dist.	No			x	
CA0028479	Witco Chemical	Yes		x		
CA0028282	USN Mare Island Shipyard	Yes			x	
CA0027898	Hein Brothers Asphalt	Yes		x		
CA0028819	Petromark, Inc.	Yes		x		
CA0028631	National Semiconductor	Yes			x	
CA0029106	GWF Power Systems Company	No				x
CA0027952	American Brass & Foundry	No				x
CA0028134	Union Carbide	Yes				x
CA0037401	DPR Angel Island State Park	Yes	x			
CA0038539	West Contra Costa CSD	No				x

Data Source: DPS 6483 and Regional Water Board response

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION THREE

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0047364	Carpinteria SD	No			x	
CA0047881	Morro Bay/Cayucos SD WWTP	No		x		
CA0048160	Goleta SD WWTP	No				x
CA0048551	Monterey Regional WPCA	No	x			
CA0048151	City of Pismo Beach WWTP	No	x			
CA0000230	Chevron, Carpinteria	Yes	x			
<u>MINORS</u>						
CA0049077	Watkins-Johnson Company	No		x		
CA0049352	Buena Vista Mines	No				x
CA0049361	Buena Vista Mines	No				x
CA0047902	City of San Juan Bautista	No			x	
CA0049271	CA Dept. of Transportation	No		x		
CA0048828	City of Scotts Valley	No				x
CA0048682	Lonestar Santa Cruz Cement Mill	No		x		
CA0047872	Highlands Inn WWTP	No				x
CA0049263	Chevron Station 90049, Gilroy	No		x		
CA0048909	Sea Products Company	No				x
CA0049247	World Oil Number 52	No		x		
CA0049239	Shell Oil, Gilroy	No		x		
CA0048615	Cambria CSD	No			x	
CA0049310	Guadalupe Abalone Culture Factory	No				x
CA0047708	Apple Growers Ice & Cold Storage	No				x
CA0049328	Pacific Mariculture, Inc.	No			x	
CA0049344	The Abalone Farm	No				x
CA0049140	Chevron, Gaviota	No	x			
CA0049101	Salinas Industrial	No	x			
CA0048054	Summerland SD	No			x	

Data Source: DPS 6483 and Regional Water Board response dated July 27, 1992

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION FOUR

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER	1	2	3
<u>MAJORS</u>						
CA0058033	Borden Chemical - Rohm and Haas	No				x
CA0053953	Los Angeles DPW	No				x
CA0054224	Ventura Regional SD - Santa Paula	No		x		
CA0056294	Thousand Oaks Utility Department	No		x		
CA0054097	City of Oxnard WWTP	No		x		
CA0057126	Keysor - Century Corp.	No		x		
CA0109991	Los Angeles DPW - Hyperion	Yes				x
CA0055115	Golden West Refining Company	No			x	
CA0054372	City of Avalon	No	x			
CA0053856	LA DPW - Terminal Island	Yes		x		
CA0001309	Rockwell International Corporation	Yes		x		
CA0003786	Long Beach Naval Shipyard	Yes			x	
CA0000680	ARCO - Watson Refinery	Yes	x			
CA0000361	LA DWP - Harbor Generating Sta	Yes		x		
CA0003778	Texaco - Wilmington Plant	Yes		x		
CA0000035	Unocal - LA Refinery	Yes		x		
CA0000809	Shell Oil Co - Wilmington	Yes		x		
CA0001333	Star Kist Foods - Plant No 1	Yes				x
<u>MINORS</u>						
CA0057371	California Milk Products	No	x			
CA0057517	TRW, Inc.	No				x
CA0060984	Hueneme School District	No		x		
CA0001902	Western Fuel Oil Company	No				x
CA0053589	A. G. Layne, Inc.	No		x		
CA0059595	Maple Plaza, Ltd.	No				x
CA0059552	Hemlock Mutual Water Company	No				x
CA0059510	Cadillac Fairview/California	No				x
CA0002046	Southern California Gas Company	No				x
CA0059021	Ventura Regional SD	No	x			
CA0059544	City of Long Beach	No		x		
CA0055816	GATX Tank Storage Terminals, Co.	No				x
CA0002186	GATX Terminals Corp.	No				x
CA0056928	Norwalk Dump Company	Yes		x		
CA0058670	LA City Public Buildings	Yes		x		
CA0110175	US Navy	Yes		x		
CA0056987	Atchison, Topeka & Santa Fe RR	Yes				x
CA0058971	Witco Chemical Corp.	Yes	x			
CA0053031	Foothill Car Wash	Yes				x

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION FOUR (CONTINUED)

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY				
			QUARTER	1	2	3	4
<u>MINORS</u>							
CA0056545	City of LA Recreation and Parks	Yes					x
CA0058211	J. C. Penney Company	Yes	x				
CA0059242	Cooper Drum Company	Yes		x			
CA0000345	Chevron USA, Inc.	Yes		x			
CA0001406	Douglas Aircraft, Inc.	Yes	x				
CA0059293	Chevron USA, Inc.	Yes					x
CA0002798	San Pedro Marine, Inc.	Yes		x			
CA0056359	Thousand Oaks Utility District	Yes					x
CA0058688	Airesearch Manufacturing Co.	Yes	x				
CA0056880	Airesearch Manufacturing Co.	Yes	x				
CA0002089	Todd Shipyards Corporation	Yes		x			
CA0053112	State Farm Mutual Auto Ins. Co.	Yes		x			
CA0001325	United Food Processors	Yes		x			
CA0053261	R&B Enterprises	Yes					x
CA0058700	US Navy	Yes		x			
CA0053503	Topa Equities, Ltd.	Yes					x
CA0052965	Schine Enterprises, Inc.	Yes	x				
CA0053571	Hyatt Hotel Corp.	Yes	x				
CA0053392	Canale Foods, Inc.	Yes		x			
CA0000884	Ball Corporation	Yes		x			
CA0003123	Defense Logistics Agency	Yes					x
CA0059331	City of Santa Fe Springs	Yes					x
CA0052809	Pacific Management Company	Yes		x			
CA0053074	R Reef USA Fund II Corp.	Yes	x				

Data Source: DPS 6483, June version of workplan, and Regional Water Board response

ATTACHMENT ONE
PROJECTED NPDES PERMIT REISSUANCE
FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION FIVE

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0079138	City of Stockton Main STP	Yes				X
CA0082236	Clearlake Oaks CWD	No				X
CA0079243	City of Lodi	Yes				X
CA0079502	City of Roseville	No				X
CA0004821	Packaging Company of California	No				X
CA0004065	Simpson Paper Co.	No				X
<u>MINORS</u>						
CA0079341	Placer County Service Area 28	No				X
CA0004774	DFG Nimbus Fish Hatchery	No				X
CA0082163	DFG Macon Springs Fish Hatchery	No				X
CA0080616	Atwater Canning Company	No				X
CA0004201	DFG Coleman Fish Hatchery	No				X
CA0004090	Del Monte Manufacturing	Yes				X
CA0082155	Mount Lassen Trout Farms	No				X
CA0082244	Brush Creek Mining & Development	No				X
CA0078093	Deuel Vocational Institute WWTP	No				X
CA0004316	Proctor and Gamble	Yes				X
CA0082228	United Air Cargo	No				X
CA0082210	GWF Bare III P.P.	No				X
CA0082309	GWF Bare IV P.P.	No				X
CA0080675	Allied Energy Corp.	No				X
CA0082040	Camanche Dam Power House	No				X
CA0081248	Imperial West Chemical Plant	No				X
CA0004693	Shasta Dam Area PUD	No				X
CA0082147	Quincy Sawmill	No				X
CA0004031	Anderson Sawmill No. 3	No				X
CA0081451	Big Valley Lumber Company	No				X
CA0078921	City of Alturas	No				X
CA0008921	Tri-Valley Growers	No				X
CA0078221	Sequoia Forest Industry, NF Sawmill	No				X
CA0081337	SCE Balsam Meadows Hydro	No				X
CA0081019	The Beverage Source	No				X
CA0081817	McFarland Energy - Mount Poso	No				X
CA0079758	Olcese W. P.	No				X
CA0081388	Oxy USA - Mount Poso	No				X
CA0078859	Schaeffer Oil company	No				X
CA0081256	Kraft, Inc. - Visalia	No				X
CA0081779	SCE Pole Yard	No				X
CA0080161	City of Taft	No				X
Data Source: DPS 6483 and Regional Water Board response						

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION SIX

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0102695	Susanville CSD	No				x
<u>MINORS</u>						
CA0102920	Litchfield Developers	Yes				x
CA0102911	City of Susanville DPR	Yes		x		
CA0102831	City of Susanville Geothermal	Yes		x		
CA0102881	Wineagle Geothermal	Yes		x		
CA0102890	Transpacific Geothermal	Yes		x		
CA0102750	Tahoe Keys WWTF	Yes		x		
CA0102784	DFG Mount Whitney Hatchery	No				x
CA0102776	DFG Hot Creek Hatchery	No				x

Data Source: DPS 6483 and Regional Water Board Response

Note: CA0102911 and CA0102831 may be replaced with WDRs instead of reissued.

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION SEVEN

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0104205	City of Needles	No				x
CA0104418	City of Calexico	No				x
<u>MINORS</u>						
CA0104841	Date Garden	Yes				x
CA0104345	Sunset Mutual Water Company	Yes				x
CA0105007	City of Westmorland	Yes				x
CA0105023	Seeley CWD	Yes				x
CA0104264	Forrest Enterprises, Inc.	Yes				x
CA0104876	Geo East Mesa Limited Partnership	No				x
CA0104949	IID - Rockwood Gas Station	Yes				x
CA0104990	Mesquite Lakes Power Plant	Yes				x

Data Source: DPS 6483 and Regional Water Board response

ATTACHMENT ONE
PROJECTED NPDES PERMIT REISSUANCE
FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION EIGHT

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER			
			1	2	3	4
<u>MAJORS</u>						
CA0110604	Orange County SD	Yes				x*
CA0001163	Southern California Edison, HB	No		x		
CA8000070	Jurupa CSD	No				x
CA8000216	SAWPA RIX	No				x**
* - Regional Water Board is awaiting EPA decision on 301(h) waiver; decision expected during first quarter; permit tentatively scheduled for third quarter.						
** - Permit issued for RIX demonstration project, now completed; permit for full scale project expected in fourth quarter.						
<u>MINORS</u>						
CA0106607	US Marine Corps - Tustin	Yes		x		
CA0106593	US Marine Corps - El Toro	Yes		x		
CA0107093	Delco Remy Division, Inc.	Yes		x		
CA0106283	Walt Disney Productions	Yes		x		
CA0107166	Sunset Aquatic Marine Center	Yes		x		
CA0001210	Southern California Edison	Yes		x		
CA8000029	USMC - Tustin	Yes		x		
CA0107077	U. S. Pipe and Foundry	Yes		x		
CA0106640	Teledyne Battery Products	Yes		x		
CA0106721	Schock Boat Repair	Yes			x	
CA0006485	Aminoil USA, Inc.	Yes			x	
CA8000002	South Coast Boat Yard	Yes			x	
CA0105864	Balboa Boat Yard	Yes			x	
CA0106569	Blue Moon Boatyard	Yes			x	
CA0105457	California Steel Industries	Yes			x	
CA0107123	Turnstone Corp. Boatyard	Yes			x	
CA8000071	USA Petroleum Corp., GW Cleanup	Yes			x	
CA8000015	City of San Bernardino Geothermal	Yes			x	
CA8000058	Canale Food, Inc., Storm Water	Yes			x	
CA0105449	Kaiser Steel Resources Storm Water	Yes			x	
CA8000224	Elsinore Valley MWD, Horsethief STP	Yes				x
CA0111007	US Air Force - March AFB	Yes				x
CA0105783	Newport Harbor Shipyard	Yes				x
CA0105902	Balboa Is. Ferry Boatyard	Yes				x
CA0106763	Peninsula Shipyard	Yes				x
CA8000091	Aerochem Inc., GW Cleanup	Yes				x
CA8000064	Quaker Chemical Corp.	Yes				x
Ca8000074	Mobil Oil Corp., Warner HB	Yes				x
CA8000084	Asian Gardens, Ltd., GW	Yes				x
CA8000082	Shell Oil Co., Irvine Ave. GW	No				x
CA8000083	Kayo Oil, Warner HB	No				x
CA8000077	Orange Co. Dept. of Airports, JW	No				x
CA0107051	Pacific Telephone Dewatering	Yes				x

ATTACHMENT ONE
 PROJECTED NPDES PERMIT REISSUANCE
 FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION EIGHT (CONTINUED)

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER	1	2	3
<u>MINORS</u>						
CA0107069	Cargill Inc., Storm Water	Yes				x
CA8000089	Unocal Irvine	No				x
CA8000090	Unocal Newport Beach	No				x
CA8000091	Arco SS #1924	No				x
CA8000097	Arthur Spitzer GW	No				x
CA8000088	James Kelber Car Wash	No				x

Data Source: DPS 6483 and Regional Water Board response dated July 31, 1992

ATTACHMENT ONE
PROJECTED NPDES PERMIT REISSUANCE
FFY 93 SECTION 106 WORKPLAN COMMITMENTS

REGION NINE

PERMIT NUMBER	AGENCY NAME	BACKLOG?	SFY			
			QUARTER	1	2	3
<u>MAJORS</u>						
CA0107492	Padre Dam MWD	No				x
CA0107671	National Steel & Shipbuilding Co.	Yes				x
CA0108181	SCE - SONGS Unit 3	Yes				x
CA0108073	SCE - SONGS Unit 2	Yes				x
CA0001376	SDGE - Silver Gate PP	Yes				x
CA0001384	SDGE - Station B PP	Yes				x
CA0001368	SDGE - South Bay PP	Yes				x
CA0001350	SDGE - Encina PP	Yes				x
CA0108294	USMC - Plant 13	Yes				No Renewal
CA0108251	USMC - Plant 9	Yes				No Renewal
CA0108260	USMC - Plant 10	Yes				No Renewal
CA0108235	USMC - Plant 3	Yes				No Renewal

Note: The Marine Corps plants will be modified and the discharges will be regulated under waste discharge requirements under Porter-Cologne.

MINORS

Region 9 will have no resources to renew any minors in FY 1992-93. However, State Water Board staff are providing assistance to Region 9 in renewing several minors, as follows:

CAG717001	Shipyards and Boatyards General Permit involving about 11 existing NPDES facilities and numerous currently unpermitted facilities					x
CA0107191	Tri-City Hospital	Yes				x
CA0108065	Ritz-Carlton Hotel	Yes				x
CA0107259	Scripps Institute	Yes				x
CA0107956	San Juan Boat Basin	Yes				x
CA0003974	Del Mar Boat basin	Yes				x
CA0107336	Sea World	Yes				x
CA0108022	Fluid Systems	Yes				No Renewal
CA0108111	Western Energy Engineers	Yes				No Renewal
CA0108138	San Juan Capistrano	Yes				No Renewal
CA0107859	Rohr Industries	Yes				x
CA0107476	Chevron Oil	Yes				x

Note: Three minors will not be renewed for various reasons; dischargers will be so informed by Region 9, with assistance of State Water Board staff.

[space for Attachment Two]

ATTACHMENT THREE
 PROJECTION OF NPDES COMPLIANCE INSPECTIONS
 July 1992 - June 1993

Regional Water Board

	1	2	3	4	5	6	7	8	9	Total
<u>Projected Regional Water Board Compliance Inspections in SFY 1992-93</u>										
MAJOR INSPECTIONS	13	60	66	48	55	3	9	32	22	308
Per Major	1	1	3	1	1	1	1	2	1	
MINOR INSPECTION	62	31	145	110	75	13	26	85	45	592
Per Minor	1	0.2	1.63	0.26	0.35	1	1	0.3	1	
TOTAL INSPECTION	75	91	211	158	130	16	35	117	67	900
<u>Administrative Procedures Manual Recommended Number of Inspections</u>										
Majors + Minors	204	511	205	670	658	36	101	717	183	3285
<u>Minimum Number to Meet EPA Target</u>										
Majors + Minors	24	92	38	131	99	6	14	51	32	487
<u>Projected Percent of APM Recommended Number to be Inspected in SFY 1992-93</u>										
TOTAL	37%	18%	103%	24%	20%	44%	35%	16%	37%	27%

NOTE: Based on DPS 6483 as of end of May 1992, APM, and Regional Water Board responses.

ATTACHMENT FOUR
 PRETREATMENT PROGRAM COMMITMENTS
 AS DERIVED FROM SFY 1992-93 NPDES PROGRAM WORKPLANS

REGION PROGRAMS	NEW/MODIFIED PRETREATMENT	ANNUAL REPORTS	PCI'S SFY	AUDITS COMPLETED SFY	AUDIT REPORTS	FFY AUDIT
1	0/1	3	3	0	0	0
2	0/8	28	20	8	7	8
3	0/2	10	9	1	2	1
4	1/2	11	8	2	2	2
5	1/0	20	15	5	4	5
6	0/0	0	0	0	0	0
7	0/0	0	0	0	0	0
8	0/0	10	8	1	7	9
9	1/5	7	5	2	3	2
TOTALS	4/22	97	72	27	27	27

Special Notes:

This is a provisional commitment, subject to revision when the State's budget is resolved and the annual NPDES Program workplans are developed. The State Water Board will inform EPA by October 15, 1992 of revisions which must be made to this attachment.

Because the Regional Water Boards prepare annual workplans on a State fiscal year basis, information on commitments for the last quarter of FFY 93 is not available until about June 1993. An update of this Attachment will be submitted to EPA about June 1993 to reflect commitments for the last quarter of FFY 93.

KEY: SFY = State Fiscal Year, July 1992 - June 1993
 FFY = Federal Fiscal Year, October 1992 - September 1993