

**California Regional Water Quality Control Board
Central Valley Region**

**Long-term Irrigated Lands Regulatory Program
Revised Advisory Workgroup Strategy**

January 9, 2009

In Fall 2008, the California Regional Water Quality Control Board, Central Valley Region (Water Board) convened a Long-term Irrigated Lands Regulatory Program Advisory Workgroup (Workgroup) to provide Water Board staff with input on the development of the long-term irrigated lands regulatory program (long-term program). For more background information on the development of the long-term program, see the Long-term Irrigated Lands Regulatory Program Background document posted online at:

http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/long_term_program_development/

Water Board staff and the Workgroup must move efficiently to develop a recommended long-term program for California Environmental Quality Act (CEQA) Environmental Impact Report (EIR) analysis prior to expiration of the current program. To do this Water Board staff and the Workgroup must have a method to:

1. Develop long-term program alternatives (alternatives), and
2. Select recommended alternatives to evaluate in the EIR.

This document proposes a strategy to help Water Board staff and the Workgroup develop alternatives for analysis in the EIR.

Overview on Developing and Evaluating Alternatives

There are many options that could be considered when developing the long-term program. The alternatives need to be evaluated to determine a recommended alternative, or in the context of CEQA, to define the “project.” Initially, Water Board staff proposed a two phase process:

Phase I – Develop a comprehensive list of alternatives and prioritize the alternatives using an evaluation measures- based (e.g., effectiveness, cost) quantitative scoring system. The goal of the Phase I step was to develop a “preferred” list of alternatives for further Workgroup consideration.

Phase II – Further evaluation and deliberation of “preferred” alternatives to develop final program alternatives to be evaluated in an EIR for the long-term program.

At the December 17 meeting, the Workgroup decided to eliminate the Phase I portion of the proposed strategy. Instead, the Workgroup and Water Board staff will develop proposed alternatives for Workgroup evaluation and deliberation. The goal of Workgroup evaluation and deliberation will be the selection of long-term program alternatives to be evaluated in the EIR for the long-term program.

Long-term Program Matrix and Template

Under this revised strategy, Workgroup participants and Water Board staff will develop proposed alternatives using the attached Alternatives Template (template) and if warranted, the attached Long-term Program Matrix (matrix) (respectively Attachment I and Attachment III) as organizational tools.

Long-term Program Matrix

The matrix consists of five program components that comprise the minimum aspects that should be addressed in any long-term program alternative. Workgroup participants are encouraged to closely review the matrix components to ensure they have clarity on the minimum conditions that all alternatives should achieve. Each component is made up of a series of possible elements designed to implement that component. Program components and elements are specifically defined in Attachment II. The matrix includes the following essential program components:

- Program Organization: Will program requirements be broadly applicable or will they be tailored based on geographic region, threat to water quality, or another scheme?
- Core Requirements: What will be the focus of the requirements (management practices, discharge limitations)?
- Lead Entity: Who will the Water Board interact with (coalitions, growers, other)?
- Monitoring: What type of monitoring will the program require?
- Implementation Mechanism: Examples of implementation mechanisms include waiver(s), waste discharge requirements (WDRs), and conditional prohibitions of discharge.

As stated above, each matrix component contains several elements. Elements are possible options that will satisfy the component requirement. For example, monitoring is considered an essential program component; however, there are several options that could be considered viable monitoring programs (watershed-based, farm-based, or both).

Moving from left to right in the matrix and selecting a program element from each program component will represent one complete long-term program alternative. It should be noted that the approaches to addressing discharges to surface water

Advisory Workgroup Strategy

and groundwater need not be identical. However, possible additional costs brought about by the increased complexity of implementing groundwater and surface water programs that differ in terms of their approach will be considered by the Water Board.

Long-term Program Template

The matrix serves as an organizational tool for developing general descriptions of long-term program alternatives and as a specific reminder of the minimum long-term program components that should be addressed under each alternative. Long-term program alternatives will be developed by Workgroup participants in a more specific manner for further deliberation and evaluation by the full Workgroup. For example, additional explanation is needed to describe an alternative with the “tailored” element selected in the Program Organization component. Program Organization could be tailored based on a threat to water quality, geographical location, or type of operation.

The proposed template, included as Attachment III, provides a structure for Workgroup participants to develop the specifics of a proposed long-term program alternative. The template will help ensure that all alternatives developed by Workgroup participants are in a standardized form and that the essential program components shown in the matrix are addressed.

In addition to addressing the essential program components in the matrix, we also request that Workgroup participants include the following in their proposed alternative:

- A statement of purpose summarizing the goals and objectives of their proposed alternative(s).
- Consideration (where feasible and appropriate) of the interests of other diverse stakeholders and how the proposed alternative accommodates these other interests and objectives.

In describing their proposed alternatives, Workgroup participants are strongly encouraged to provide as detail the types of requirements or conditions they envision within each program component.

Minimum Requirements for Program Alternatives

In order to be considered, long-term program alternatives must meet the statutory requirements established in applicable State policy and regulations (e.g., [California Water Code](#), [Central Valley Regional Water Board Water Quality Control Plan](#), or [Basin Plan](#), [State Water Resources Control Board Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program](#), [State Antidegradation Policy](#)). Alternatives that do not meet minimum

Advisory Workgroup Strategy

statutory requirements will not be considered for inclusion in the long-term program.

The essential program components in the matrix were developed to help ensure that the above minimum statutory requirements are addressed when developing program alternatives. Therefore, program alternatives should include each of the program components described in the matrix. This does not preclude Workgroup participants from adding program components or elements (either in the narrative template format, or in the matrix format). However, if a Workgroup participant wishes to remove a component, justification must be provided to ensure that the minimum statutory program requirements are still satisfied.

Final Selection of Program Alternatives

Water Board staff and Workgroup developed alternatives will be the focus of Workgroup deliberation and evaluation. The goal of the deliberation and evaluation process is to identify which alternatives should be evaluated in the EIR.

The following process will be used to determine which Workgroup and staff developed program alternatives will be evaluated in the EIR:

1. **Consensus alternatives:** All long-term program alternatives that receive Workgroup consensus (as defined in section 3.7 of the [Workgroup Charter](#)) for further consideration will be evaluated in the EIR.
2. **Non-consensus alternatives:** Water Board staff will make an effort to include non-consensus long-term program alternatives that are feasible and reasonable in the EIR analysis.

For the EIR analysis, Water Board staff will need to identify one recommended program alternative. In this evaluation, staff will consider the following measures:

- Workgroup recommendations and comments, and
- Water Board staff developed evaluation measures.

The deliverable to the Water Board from this process will be a *Long-Term Irrigated Lands Program Staff Report* which will include:

- Workgroup and Water Board staff developed alternatives,
- Workgroup recommendations,
- Water Board staff developed evaluation measures,
- Alternatives selection process,
- Alternatives selected for evaluation in the EIR, and
- Staff recommended alternative.

Workgroup Strategy - Next Steps

Table 2 outlines a proposed timeline to accomplish the Workgroup strategy described above. This timeline provides more detail than the timeline described in the Long-term Irrigated Lands Regulatory Program Advisory Workgroup Charter (Workgroup Charter). As such, this timeline is consistent with and is not intended to replace the Charter timeline. Water Board staff and the Workgroup will work collaboratively to establish reasonable time periods for Workgroup review and comment on interim products.

Table 2. Proposed Workgroup Strategy Timeline

Date	Action	Outcome/Deliverable
December 17 (2008)	Workgroup meeting	<ul style="list-style-type: none"> • Discuss and finalize October 9 meeting summary and charter document • Present proposed Workgroup strategy
February 6 (2009)	Proposed alternatives due (Workgroup /staff)	Workgroup proposed alternatives along with statement of interest and goals
February 17 (2009)	Workgroup meeting	Workgroup participants and staff present proposed alternatives
March 30 (2009)	Workgroup meeting	Deliberation on proposed alternatives.
May 19 (2009)	Workgroup meeting	<ul style="list-style-type: none"> • Revised alternatives presentations (if any) • Continue deliberation on proposed alternatives
June 23 (2009)	Workgroup meeting	<ul style="list-style-type: none"> • Revised alternatives presentations (if any) • Continue deliberation on proposed alternatives
July 28 (2009)	Workgroup meeting	Workgroup consensus and recommendations on alternatives to be considered in the EIR
September (2009)	Long-term program staff report due (staff)	Staff report describing workgroup alternatives, selection process, workgroup recommendations, alternatives advanced to EIR, and the staff recommended alternative
November (2009)	Comments due (Workgroup)	Workgroup comments on the long-term program staff report

The timeline shown in Table 2 is proposed, and can be changed based on Workgroup comments. The top long-term programs must be determined by summer 2009 so that the EIR phase of the project can be initiated. For more information on the required project timeline see the Workgroup Charter.

ATTACHMENT I – LONG-TERM PROGRAM MATRIX

Program Components

Program Type	Program Organization	Core Requirements	Lead Entity	Monitoring	Implementation Mechanism
Surface water	All Irrigated Ag+Wetlands	Standard-based (set enforceable standards)	3rd Party (coalition, watershed group)	Watershed-based/regional	Waiver
Groundwater	Tailored (threat to water quality), geography)	Plan-based	Direct Water Board administration	Farm-based	WDRs
		Standard+Plan-based	3rd Party w/Joint Powers Authority (JPA)	Watershed/regional+Farm-based	Waiver+WDRs

Program Elements

green shading indicates that additional information is needed to describe the alternative
 yellow shading indicates that the alternative is already described

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

The following provides the definitions associated with the components and elements in the long-term program matrix.

General Definitions

Program Component

Program components encompass the minimum aspects that should be considered under any long-term program alternative. The five basic components currently identified by Water Board staff are Program Organization, Core Requirements, Monitoring, Lead Entity, and Implementation Mechanism. As discussed in the strategy under “Minimum Requirements for Program Alternatives,” Workgroup participants are encouraged to add additional components as needed when designing their alternatives. If a Workgroup participant wishes to remove any of the existing components, assurances that minimum statutory requirements are still achieved must be provided.

Program Element

Elements are possible options that will satisfy a program component requirement. For example, monitoring is considered an essential program component; however, there are several options that could be considered viable monitoring programs (watershed-based, farm-based, or both).

Matrix Program Component and Element Definitions

Program Organization

Program organization dictates how the requirements for the long-term program will be applied. Program requirements could apply to all irrigated lands or be tailored for different geographical locations, crop types, or based on relative threat to water quality.

Core Requirements

The core requirements establish the methods by which the program will ensure waste discharges from irrigated lands are in compliance with applicable State policy and regulations (e.g., [California Water Code](#), [Central Valley Regional Water Board Water Quality Control Plan](#), or *Basin Plan*, [State Water Resources Control Board Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program](#), [State Antidegradation Policy](#)). At a minimum, alternatives must ensure the protection of applicable Basin Plan beneficial uses, establish monitoring, and be enforceable.

Alternative elements for core requirements include standard based, plan-based, and standard+plan-based. These elements are described in more detail below:

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

Standard-based - Under a standard-based approach, enforceable waste constituent limitations (e.g., fecal coliform, pesticides) would be set for discharges from agricultural lands to ensure compliance with water quality objectives specified in the Basin Plans. The constituents to be regulated may be determined based on use or presence of a waste constituent, discharge monitoring, and/or receiving water monitoring. Discharge limitations could be set on a receiving water or individual discharge point basis. For example, growers discharging tailwater containing pesticides could be required to meet receiving water limits or end-of-field limitations for pesticides protective of Basin Plan water quality objectives.

Since a standard-based approach relies heavily on discharger compliance with established limitations, monitoring is required. At a minimum, monitoring must be conducted to verify compliance with established limitations (e.g., in the receiving water or from the discharge point) and with water quality objectives.

Plan-based - Under a plan-based approach, growers would be required to develop water quality management practices that would minimize or prevent waste discharge. Implementation of water quality management plans must at a minimum ensure that receiving waters meet applicable Basin Plan water quality objectives.

In a plan-based approach, it is important to utilize monitoring to ensure that water quality objectives are met since effectiveness of management practices is highly dependent on local conditions (e.g., waste type, geology). Any plan-based approach should thus incorporate monitoring to ensure that management practices are effective and that water quality objectives are met. An iterative approach whereby management plans are revised and improved in response to monitoring results may be considered.

Standard+plan-based - Under this option, the Water Board would set waste discharge limitations as with the standard-based approach, but would additionally require the development of water quality management plans. Such plans may be developed for all agricultural discharges or only in a targeted manner (i.e. in sensitive areas, where water quality concerns exist, etc.). This approach allows the Board flexibility to establish waste limitations for certain constituents while addressing other constituents through management plans, such as where water quality objectives have not been established (e.g., certain pesticides).

Since this option includes both standard and plan-based, minimum monitoring must be established to 1) verify compliance with any waste constituent limitations and/or 2) ensure that water quality objectives are met in receiving waters.

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

Lead Entity

Lead Entity describes the mechanism for Water Board interaction with growers. The Water Board could 1) work through third party groups that do not have direct responsibility for the discharge, but represent the growers 2) work directly with growers, or 3) work with an entity that includes multiple growers and has legal responsibility for the discharge (e.g., certain water districts or a joint powers authority). These three elements are described below:

3rd Party – In a 3rd party lead entity structure, a number of growers are represented by a single entity. The 3rd party lead entity acts as a conduit between the Water Board and the growers but growers bear ultimate responsibility for compliance with program requirements. This structure is analogous to the current coalition-based program.

Direct Water Board Administration - In this approach, the Water Board would work directly with growers. Growers would seek coverage under a waiver or under general or individual WDRs without a 3rd party acting as intermediary. This approach is similar to the point source and stormwater permitting programs at the Water Board.

3rd Party with Joint Powers Authority (JPA) - This approach would be mechanically similar to the 3rd party approach. The main difference being that the 3rd party in this case would form a JPA which would take responsibility for compliance with program requirements. Water Board enforcement actions and requests for information would be legally addressed to the JPA.

Monitoring

Monitoring requirements must be established to ensure that a regulatory program is having the intended effects and to ensure that regulated entities are discharging waste in accordance with established requirements. While monitoring is a requirement in any regulatory program, the type of monitoring could be widely different depending on the specific problems the regulatory program is addressing. Options for monitoring in the irrigated agriculture program include watershed-based/regional, farm-based, and watershed+farm-based.

Watershed-based/regional – In this monitoring scheme, water bodies or ground water basins are monitored for compliance with water quality objectives or limitations. Watershed-based/regional monitoring can be used to effectively determine whether there is a problem in the watershed or groundwater basin, but the approach can have significant limitations when it comes to the determination of sources, especially where there are non-agricultural waste sources within the watershed/basin (e.g., natural sources,

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

municipalities, septic systems). Navigating the confounding influences of additional pollutant sources can add significant costs to watershed-based monitoring programs and there are questions regarding the fairness of placing this burden directly upon agriculture.

Benefits of watershed or regional monitoring include the ability to spread monitoring costs to all agricultural waste sources and the fact that individual growers do not need to sample and report field discharge events.

Farm-based – Under a farm-based monitoring approach, each grower would conduct water quality monitoring. For surface water discharge, the waste discharge characteristics of runoff from each farm would be determined. However, with this approach, it may be difficult to characterize the actual effect a given agricultural waste discharge has on receiving water bodies. For example, where a farm discharges to a large river, farm-based monitoring may not provide enough information to determine whether the discharge is affecting the river due to possible dilution effects. Additionally, the cost of farm-based monitoring is likely to be significant for growers with multiple fields and multiple discharge points.

For groundwater, a farm-based approach could determine whether a grower is impacting groundwater quality. However, the cost of this type of analysis will likely be significant (e.g., drilling several wells, and analyzing background concentrations).

Watershed-based/regional+farm-based – This type of monitoring is some combination of watershed-based/regional and farm-based monitoring. An example would be requiring photographic monitoring of installed management practices in addition to watershed-based/regional monitoring. Alternatively, farm-based monitoring might be required for those farms with discharges known to impact water quality.

Implementation Mechanism

Long-term program requirements will need to be established in an enforceable regulatory mechanism. Options include waste discharge requirements (WDRs), conditional waivers of waste discharge requirements (waiver), and conditional prohibitions of discharge. While all three of these mechanisms are enforceable and could be applied to a wide variety of discharges, there are some differences that should be considered.

WDRs – Pursuant to California Water Code section 13263, the Water Board may issue individual WDRs to cover individual dischargers or general WDRs to cover a general class of dischargers. WDRs can be used to establish discharge limitations or require development of management plans and practices that will minimize waste discharge.

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

In order to obtain WDRs, a discharger must file a [report of waste discharge](#) with the Water Board under Water Code section 13260, which includes information as to the characteristics of the proposed discharge and receiving waters, the discharger, and the discharge location. The Central Valley Water Board develops the WDRs based on information reported in the report of waste discharge. Dischargers operating under WDRs must pay an annual fee set by the State Water Resources Control Board.

California Water Code section 13263 requires that WDRs implement any relevant Basin Plans and take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, and the need to prevent nuisance. Section 13263 additionally requires that the Central Valley Water Board, in developing the WDRs, consider past, present, and probable future beneficial uses; environmental characteristics of the hydrographic unit under consideration; water quality conditions that could reasonably be achieved through the coordinated control of all factors which affect water quality in the area; economic considerations; the need to develop housing; and the need to develop and use recycled water. Section 13360 of the Water Code requires that WDRs not specify the design, location, type of construction, or particular manner in which compliance may be had with the WDRs.

Violations of WDRs may be addressed through a variety of enforcement actions, including issuing Cleanup and Abatement Orders (CAOs) or Cease and Desist Orders (CDOs), assessing administrative civil liability, or seeking judicial civil liability.

Waivers – Irrigated lands are currently regulated under a waiver and this regulatory mechanism could be adopted for the long-term program. Under Water Code section 13269, a waiver may be issued for a specific discharge or a type or class of discharges. Similar to WDRs, waivers may contain enforceable discharge conditions or require development of management practices. Also, waivers may be structured to require growers to follow specific management practices in order to be covered under the waiver.

Waivers must be consistent with any applicable Basin Plan requirements and be in the public interest. Waiver conditions must include individual, group, or watershed-based monitoring, unless the Water Board finds that the discharge(s) covered do not pose a significant threat to water quality. Waivers may not exceed 5 years in duration. Dischargers are not required to submit a report of waste discharge in order to be regulated by a waiver. A discharger in non-compliance with the conditions of a waiver may be required to seek WDRs. Waivers may be enforced through an array of enforcement actions similar to those available under WDRs.

ATTACHMENT II – LONG-TERM PROGRAM MATRIX DEFINITIONS

Conditional Prohibition of Discharge – Conditional prohibitions of discharge can be established in the Basin Plan for any type of discharge (Water Code section 13243). A conditional prohibition of discharge requires a Basin Plan amendment; consequently, developing conditional prohibitions could require a significantly longer time frame than waivers or waste discharge requirements. Conditional prohibitions can contain enforceable limitations and monitoring requirements. Conditional prohibitions can also be used to require specific types of management practices. A conditional prohibition allows the Water Board to enforce a prohibition directly and immediately even in the absence of WDRs or a waiver regulating the discharge or discharger.

For more information regarding options for regulating discharges from irrigated agricultural lands see the Water Board's July 2001 staff report titled: [*A Review of Options for Controlling Discharges from Irrigated Lands*](#).

ATTACHMENT III –LONG-TERM PROGRAM ALTERNATIVE DEVELOPMENT TEMPLATE

The proposed Long-term Program Template (template), included below, provides a structure for Workgroup participants to develop the specifics of a proposed long-term program alternative. The template has been developed to help ensure that all Workgroup developed alternatives are in a standardized form and that the essential program components shown in the matrix (Attachment I) are addressed. See Attachment II for definitions of the elements discussed in the matrix/template.

As described under the Workgroup Strategy section titled “Minimum Requirements for Program Alternatives,” all alternatives must meet minimum statutory requirements in order to be considered. Therefore, program alternatives should include each of the program components in the matrix. This does not preclude Workgroup participants from adding program components or elements to the matrix. However, if a participant wishes to remove a component, justification must be provided to ensure that the minimum statutory program requirements are satisfied.

In addition to addressing the essential program components in the matrix, the template also requires that Workgroup participants develop a statement of purpose summarizing the goals and objectives of their proposed alternative(s). In their statement of purpose, participants should also make an effort to describe how their alternatives meet other stakeholders’ interests and objectives.

ATTACHMENT III –LONG-TERM PROGRAM ALTERNATIVE DEVELOPMENT
 TEMPLATE

Long-term Program Alternative Development Template	
Author(s)	
Supporting Interest Group(s)	
Executive Summary	<i>Short summary of proposed alternative</i>
Statement of Purpose/ Objectives	<p><i>Examples:</i></p> <p><i>Goals/objectives</i></p> <ol style="list-style-type: none"> 1. <i>Prevent degradation and meet water quality objectives</i> 2. <i>Meet water quality objectives</i>
Program Type	<i>Surface Water/Groundwater/Combination</i>
Application of Alternative	Type of discharge that would be regulated (e.g., irrigated lands, wetlands, nurseries)

ATTACHMENT III –LONG-TERM PROGRAM ALTERNATIVE DEVELOPMENT
 TEMPLATE

Program Organization (select one element and provide details)	
Element	Description
All Irrigated Agriculture	
Tailored	<p><i>Examples:</i></p> <p>A. <i>Basis for tailored organization:</i></p> <ol style="list-style-type: none"> 1. <i>threat to water quality</i> 2. <i>geography</i> 3. <i>commodity</i> 4. <i>other</i> <p>B. <i>Discussion and justification for tailored organization</i></p>
Core Requirements (select one element and provide details)	
Element	Description
Standard-based	<p><i>Examples:</i></p> <p>A. <i>Describe specifics of standard-based program:</i></p> <ol style="list-style-type: none"> 1. <i>Method for developing discharge limitations</i> 2. <i>Type of limitations: watershed-based/edge-of-field</i>
Plan-based	<p><i>Examples:</i></p> <p>A. <i>Describe specifics of required water quality management plans:</i></p> <ol style="list-style-type: none"> 1. <i>Farm-based/commodity-based/coalition-based</i> 2. <i>Specific requirements (e.g., Water Board review, kept onsite, etc.)</i> 3. <i>Specific management practices (e.g., tailwater return)</i>
Standard+Plan-based	<p><i>Examples:</i></p> <p><i>Describe specifics of standard+plan-based program considering the above suggestions under “standard” and “plan-based.”</i></p>

ATTACHMENT III –LONG-TERM PROGRAM ALTERNATIVE DEVELOPMENT
 TEMPLATE

Lead Entity (select one element and provide details)	
Element	Description
3 rd Party	<i>Examples:</i> <i>Coalition/Commodity/other</i> <i>Describe 3rd Party organization and structure</i>
Direct RB Administration	<i>Examples:</i> <i>Describe how the RB would interact with growers</i>
3 rd Party w/JPA	<i>Examples:</i> <i>Coalition/commodity/water district/other</i> <i>Describe 3rd Party JPA organization and structure</i>
Monitoring (select one element and provide details)	
Element	Description
Watershed-based/regional	<i>Examples:</i> <i>Describe type of proposed watershed/regional monitoring (water quality, inspections, photo, etc.)</i>
Farm-based	<i>Examples:</i> <i>Describe type of proposed farm-based monitoring (water quality, inspections, photo, etc.)</i>
Watershed/regional+Farm-based	<i>Examples:</i> <i>Describe type of proposed watershed/regional and farm-based monitoring (water quality, inspections, photo, etc.)</i>

ATTACHMENT III –LONG-TERM PROGRAM ALTERNATIVE DEVELOPMENT
 TEMPLATE

Implementation Mechanism (select one element and provide details)	
Element	Description
Waiver	<i>Examples:</i> <i>Single waiver/multiple waivers</i> <i>Specific waiver conditions</i>
WDRs	<i>Examples:</i> <i>Responsible entity for report of waste discharge</i> <i>Single WDRs/multiple WDRs</i> <i>Specific waste discharge requirements</i>
Conditional Prohibition	<i>Examples:</i> <i>Single prohibition/multiple prohibitions</i> <i>Specific conditions</i>
Combination- Waiver/WDRs/ Conditional Prohibition	<i>Examples:</i> <i>Structure of mixed mechanisms</i> <i>Responsible entity for report of waste discharge</i> <i>Specific conditions</i> <i>Specific waste discharge requirements</i>