

# Development of a **Monitoring and Surveillance** Program

Stakeholder meeting – September 24, 2015

## Regulatory Requirements:

- **Requirement of the Sources of Drinking Water Policy Resolution 88-63** (State Water Resources Control Board, 1988)

Exception 2b: The water is in systems designed or modified for the primary purpose of conveying or holding agricultural drainage waters, **provided that the discharge from such systems is monitored to assure compliance with all relevant water quality objectives as required by the Regional Boards.**

- **State Regulations and Guidance** (Porter-Cologne Water Quality Control Act, amended 2013)

Pursuant to Water Code Section 13050, subdivision (j)(3), a basin plan amendment must include an implementation program to achieve water quality objectives. Water Code section 13242 prescribes the program of implementation for achieving water quality objectives, which include the following:

- description of the actions necessary to achieve the water quality objectives;
- time schedule; and
- **a monitoring and surveillance program**

## Key Monitoring Questions:

For water bodies with the MUN use removed (meeting Exception 2b of the Sources of Drinking Water Policy) and LIMITED-MUN water bodies:

- Are relevant water quality objectives downstream being met?

For LIMITED-MUN water bodies:

- Are relevant water quality objectives within the water body being met?

## Activities needed to answer Monitoring Questions

- Are relevant water quality objectives downstream being met?
  1. Conduct a review of monitoring programs downstream of the discharge but upstream of the 1<sup>st</sup> MUN intake.
  2. Provide an evaluation of potential water quality concerns in the area.
  3. Establish a monitoring program downstream that includes identified constituents of concern.

- Does the existing monitoring capture Title 22 constituents of concern? If not, where are the data gaps?
  - 4. Conduct an evaluation of monitoring results to detect changes in constituent concentrations over time and assess impacts to water quality.
- Are relevant water quality objectives within the water body being met?
  1. Conduct a review of monitoring within the district.
    - Is there monitoring within the LIMITED-MUN water body or at a representative site?
  2. Provide an evaluation of potential water quality concerns in the water body.
  3. Establish a monitoring program that includes identified constituents of concern.
  4. Conduct an evaluation of monitoring results to detect changes in constituent concentrations over time and assess impacts to water quality.

### Monitoring and surveillance discussion questions for discussion

- Should there be minimum monitoring requirements in or downstream of de-designated or LIMITED-MUN water bodies?

Constituents? Locations? Frequency? Reporting and Assessment?

- SRSWPP provided suggested monitoring framework for downstream water bodies - Most primary and secondary MCL constituents monitored triennially

- Who will do the monitoring if current monitoring programs are found to have data gaps?

Applicant to cover any additional monitoring requirements?

Supplement with SWAMP monitoring if no regional monitoring program is in place?

- What type of coordination will there be with existing programs?

How will the implementation plan for this Basin Plan Amendment impact monitoring requirements in other programs like the Irrigated Lands Regulatory Program?

- What type of trigger could be used follow-up action?

What type of information could the Department of Drinking Water or water utilities provide to trigger an evaluation?

Will there be stakeholder notification, review and/or input when a trigger occurs?

LIMITED-MUN water bodies - to maintain existing conditions and protect downstream beneficial uses, use primary and/or secondary MCLs as a trigger to do an Antidegradation

Analysis?

- How will future discharges be evaluated?

Will permits/WDRs specifically address protection of the downstream MUN beneficial use at the next downstream designated water body?

- How will potential cumulative impacts be evaluated?

Periodically assess the water quality information and the potential for cumulative impacts when a set of water bodies comes to the Board for approval into the Basin Plan?

- Other?

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