

Fiscal Year (FY) 2021-2022 WORK PLAN

Point Source Control & Groundwater Protection Division

Programs:

NPDES Wastewater

NPDES Stormwater

Waste Discharge to Land

Solid Waste Disposal

**Underground Storage Tank Cleanup/Site Cleanup/DoD
Cleanup**

Groundwater Protection

Agricultural Lands Discharges

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Cover Photos: Photo (left): Pieta Watershed, Mendocino County. Photo (center): Santa Rosa Creek at Willowside Road. Photo (right): Lower Navarro River, Mendocino County

1.0 BACKGROUND

1.1 NPDES Wastewater Program

The National Pollutant Discharge Elimination System (NPDES) program is a federal program, which has been delegated to the State of California for implementation. NPDES permits, also referred to as Waste Discharge Requirements, are issued to regulate the discharge of municipal wastewater or industrial process, cleaning, or cooling wastewaters, commercial wastewater, treated groundwater from cleanup projects, or other wastes to surface waters only. If the waste discharge consists only of non-process stormwater, it may be regulated under the NPDES Storm Water program.

NPDES wastewater permits contain effluent limitations that prescribe the level of pollutants allowed in the discharge. These limits are based on either technology-based limits or water-quality based limits. Technology-based limits require that the best available technology (BAT) be used for the removal of pollutants. Water-quality based limits are those limits that are more stringent than technology-based limits and are applied when necessary to achieve water quality standards as set by the Basin Plan beneficial uses and water quality objectives.

NPDES wastewater permits can be issued for individual discharges or as a general NPDES permit for a class or group of discharges. Permits are issued for a five-year period and must be reviewed and reissued every five years. Facilities are also classified as either major or minor facilities depending on the volume and/or type of pollutants discharged. Major facilities are facilities with design flows greater than one million gallons per day and facilities with approved industrial pretreatment programs. Minor facilities are facilities with design flows equal or less than one million gallons per day and which have not been determined to have an actual or potential adverse environmental impact classifying the discharge as major.

There are currently forty-one (41) facilities within the North Coast Region which discharge wastewater to surface waters that are currently regulated by NPDES permits issued by the Regional Water Board. The table below indicates the number of facilities by discharge type.

Number of Wastewater NPDES Permits by Type

Municipal	Industrial	College	Fish Hatcheries
28	7	0	7

The Regional and State Water Board also develop, and issue general NPDES wastewater permits to cover multiple facilities within a specific category. The use of general permits allows us to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. The table

below indicates the total number of facilities covered by the current available general NPDES permits. There are currently 49 facilities regulated under general NPDES permits in the North Coast Region.

General NPDES Permit¹	Order Number	Current Number of Active Enrollees in Region 1
General Order for Low Threat Discharges	R1-2020-0006	4
General Order for Treated Groundwater Petroleum Hydrocarbon & Volatile Organic Compound	R1-2016-0034	3
General Order Pesticide Aquatic Invasive Species	2011-0003-DWQ	3
General Order Pesticide Spray Application	2011-0004-DWQ	0
General Order Pesticide Vector Control	2011-0002-DWQ	0
General Order Pesticide Weed Control	2013-0002-DWQ	9
General Order Utility Vaults	2014-0174-DWQ	7
General Order Drinking Water System Discharges	2014-0194-DWQ	23
General NPDES Order for Discharges from Natural Gas Utility Construction, Operations and Maintenance Activities	2017-0029-DWQ	0

1.1.1 NPDES Wastewater Program- Unallocated Objectives

Due to limited resources, some portions of the program are not prioritized and allocated staff time for the coming fiscal year. In some cases, a maintenance level of effort is allocated for in leu of a more robust implementation. For the NPDES Wastewater Program these programs include: additional facility inspection, robust document review and timely response, increased coordination with WDR, planning, and groundwater program staff, consistency review among issued permits, development of subject matter experts in area such as recycled water, collection systems, pretreatment, monitoring and ELAP, improved coordination with statewide efforts, and internal processes improvement efforts.

1.2 NPDES Storm Water Program

The Federal Clean Water Act (Clean Water Act) prohibits certain discharges of stormwater containing pollutants except in compliance with a NPDES permit. The NPDES stormwater program regulates stormwater discharges from three potential

¹ Orders beginning with R1 are regional permits. Orders ending in DWQ are statewide permits.

sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

1.2.1 Municipal Storm Water Program

The Municipal Storm Water Permitting Program regulates stormwater discharges from municipal separate storm sewer systems (MS4s). Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), stormwater permits are required for discharges from an MS4 serving a population of 100,000 or more. The Municipal Storm Water Program encompasses the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the California Department of Transportation (Caltrans Permit).

Phase I Permit Program

There is one Phase I MS4 permit in the North Coast Region, Order No. R1-2015-0030. This permit regulates the discharge of pollutants from the MS4s of the City of Santa Rosa, portions of unincorporated County of Sonoma, Sonoma County Water Agency (Sonoma Water), the City of Cotati, the City of Cloverdale, the City of Healdsburg, the City of Rohnert Park, the City of Sebastopol, the City of Ukiah, and the Town of Windsor. The Phase I permit is scheduled to be reissued by the Regional Water Board in FY 2021-22.

Phase II Permit Program

The State Water Resources Control Board issued a General Permit for the Discharge of Storm Water from Small MS4s (Order 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include facilities such as military bases, public school campuses, prison and hospital complexes. The Phase II Small MS4 General Permit covers Phase II permittees statewide. On February 5, 2013, the Phase II Small MS4 General Permit was re-adopted (Order 2013-0001-DWQ) and the new requirements became effective on July 1, 2013. The Phase II Small MS4 General Permit is scheduled to be reissued by the State Water Board in 2022. Regional Water Board staff is participating in this effort.

Caltrans Permit Program

The State Water Resources Control Board issued a Statewide Storm Water Caltrans Permit, 2012-0011-DWQ, which regulates stormwater and non-stormwater discharges from Caltrans MS4s, maintenance facilities, and construction activities. Caltrans is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties. Regional Water Board municipal stormwater staff oversees permit compliance in the North Coast region and is participating with State Water Board staff to

develop a new Caltrans MS4 stormwater permit, which is scheduled to be adopted in 2022. Additionally, a Caltrans contract liaison housed in the Region's Nonpoint Source & Surface Water Protection Division is responsible for review and issuance of Caltrans's Clean Water Act section 401 water quality certifications in Region 1, which includes oversight of stormwater discharges from those projects.

1.2.1.1 Municipal Stormwater Program- Unallocated Objectives

Due to limited resources, some portions of the program are not prioritized and allocated staff time for the coming fiscal year. In some cases, a maintenance level of effort is allocated for in lieu of a more robust implementation. For the Municipal Stormwater Program these programs include: additional inspection and program audits, robust document review and timely response, increased coordination with 401, planning, and groundwater program staff, development of deeper subject matter expertise in areas such as Low Impact Development design, municipal operations, sampling and monitoring, improved coordination with statewide efforts and permit implantation of statewide permits (CalTrans, Phase 2), focus on additional statewide permits such as Utility Vault, Pesticide, and Low Threat, and internal processes improvement efforts.

1.2.2 Construction Stormwater Program

Dischargers whose projects disturb one (1) or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity, Order 2009-0009-DWQ (Construction Stormwater General Permit). Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. There are currently 241 active sites enrolled under the Construction Stormwater General Permit.

1.2.2.1 Construction Stormwater Program- Unallocated Objectives

Due to limited resources, some portions of the program are not prioritized and allocated staff time for the coming fiscal year. In some cases, a maintenance level of effort is allocated for in lieu of a more robust implementation. For the Construction Stormwater Program these programs include: additional inspection, robust document review (Annual Reports, SWPPPs, Monitoring Reports, etc), increased data evaluation to identify trends and training needs, increased compliance support and training, improved coordination with statewide efforts related to permit implementation, renewal, enforcement efforts, improved coordination with Cannabis and Agg programs, and internal processes improvement efforts.

1.2.3 Industrial Stormwater Program

Industrial stormwater discharges and authorized non-stormwater discharges from industrial facilities are regulated under the Statewide Storm Water Industrial General Permit, Order 2014-0057-DWQ (Industrial Stormwater General Permit or IGP). The types of industrial facilities that are required to seek coverage under the IGP include manufacturers, landfills, mining facilities, facilities generating electricity using steam, hazardous waste facilities, transportation facilities with vehicle maintenance, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities. There are currently 492 active facilities currently enrolled under the Industrial Stormwater General Permit in Region 1.

Storm Water NPDES Permit	Current Number of Active Enrollees
Phase 1 Storm Water Permit	10
Phase 2 Storm Water Permit	11
Caltrans Storm Water Permit	1
Construction Storm Water Permit	241
Industrial Storm Water Permit	448

1.2.3.1 Industrial Stormwater Program- Unallocated Objectives

Due to limited resources, some portions of the program are not prioritized and allocated staff time for the coming fiscal year. In some cases, a maintenance level of effort is allocated for in lieu of a more robust implementation. For the Industrial Stormwater Program these programs include: additional inspection, robust document review (Annual Reports, SWPPPs, Monitoring Reports, NONA, NOA, NOT, etc), increased data evaluation to identify trends and training needs, increased compliance support and training, improved coordination with statewide efforts related to permit implementation, renewal, enforcement efforts, improved coordination with Agg programs, evaluation of constituents monitored for, evaluation of the need to regulate additional sectors, evaluation of the need for facility specific requirements, and internal processes improvement efforts.

1.3 Waste Discharge to Land Program (Wastewater, Waste Residuals, and Recycled Water)

1.3.1 Program Overview

The Waste Discharge to Land Program regulates all point source discharges of waste to land that do not require full containment (which falls under the Solid Waste Disposal Program), do not involve confined animal facilities (which falls under the Dairy Program), and involve no discharge of a pollutant to a surface water of the United States (which falls under the NPDES Program). To regulate these discharges for the

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protection of groundwater, the Regional Water Board prescribes waste discharge requirements (WDRs) or issues waivers of WDRs. WDRs are written for a specific discharger (individual WDRs) or to regulate a similar group of dischargers (general WDRs). In recent years, the Program staff has also used conditional waivers to regulate certain types of discharges that have the lowest threat to water quality.

Dischargers of municipal, commercial, and combined industrial wastewaters in the North Coast Region that discharge exclusively to land rely primarily on aerobic wastewater treatment systems to reduce pollutants to levels that, after discharge, are protective of groundwater quality and public health. Other common methods of land disposal of treated effluent are via percolation ponds, infiltration beds, large leachfield systems, or via spray or drip irrigation.

Waste Discharge Requirements (WDRs)

WDRs issued by the Regional Water Board include prohibitions, effluent limitations, and other general provisions to ensure that the discharge complies with all laws, regulations, and policies set forth in the Basin Plan for the North Coast Region. Self-monitoring programs are also prescribed that require the waste discharger to collect and submit to the Regional Water Board effluent and other water quality monitoring data to determine compliance with WDRs.

The number and type of facilities currently regulated by waste discharge requirements in the Waste Discharge to Land Program include:

- Municipal and community wastewater treatment facilities (37)
- Wineries and other Beverage and Food Processors (116)
- Recycled Water Producers and Users (20)
- Public Sanitary Sewer Systems (71)
- Mobile Home Parks, Campgrounds, Caltrans Roadside Rest Areas, Private WWTPs (73)
- Sawmills (2)
- Projects involving the land application of biosolids and ash (4)

Use of General WDRs and Waivers of WDRs

The State and Regional Water Boards develop and issue general permits to cover multiple facilities within a specific category. The use of general permits allows the Water Boards to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. In addition, the use of a general permit ensures consistency of permit conditions for similar facilities. General permits may be written to cover categories of point sources having common elements, such as:

- Facilities that involve the same or substantially similar types of operations
- Facilities that discharge the same types of wastewater
- Facilities that require the same effluent limitations or operating conditions

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- Facilities that require the same monitoring where tiered conditions may be used for minor differences within class (e.g., size or seasonal activity)
- Facilities that are more appropriately regulated by a general permit

The following are general permits commonly used in the North Coast Region for wastewater discharges to land:

- General Permit for Small Domestic Wastewater Treatment Systems
- General Permit for Sanitary Sewer Systems
- General Permit for Recycled Water Use
- General Permit for Wine, Beverage, and Food Processor Waste
- General Permit for Low Threat Discharges
- General Permit for Transportation Structure Repainting
- General Permit for Drinking Water Systems Discharges
- General Permit for Winery Process Water (new)

On January 20, 2021, the State Water Board adopted the General Waste Discharge Requirements (WDRs) for Winery Process Water (General Order). The adopted General Order is designed to streamline statewide permitting of winery process water discharges to land, achieve statewide consistency, and allows regional water boards to focus their resources on managing backlogged individual orders and General Order compliance. Existing wineries, except those with individual WDRs, general WDRs, or conditional waivers of WDRs, are required to seek coverage under the General Order by January 20, 2024. Existing wineries that have WDRs or Waiver of WDRs coverage may continue discharging under that authority until those orders expire or come up for renewal. New wineries are required to seek coverage under the General Order at least 180 days prior to commencement of operations. The General Order is intended to be the primary permitting mechanism for wineries in the state and regional water boards are to enroll all eligible wineries.

For certain categories of low threat discharges to land, the Regional Water Board may issue a waiver of waste discharge requirements if the waiver is consistent with the Water Quality Control Plan for the North Coast Region (Basin Plan) and is in the public interest. In 2017, the North Coast Regional Water Board adopted Order No. R1-2017-0039, Conditional Waiver of Waste Discharge Requirements for Specific Categories of Low Threat Discharge in the North Coast Region. As with other waivers of WDRs, this conditional waiver expires after five years and must be renewed by the Regional Water Board.

Assistance to Disadvantaged Communities (DACs)

Approximately 70 percent of the communities in the Region are disadvantaged and facing financial hardship. Of these communities, approximately 55 percent are a severely disadvantaged (SDACs) and approximately 45 percent are DACs. These communities have aging and undersized centralized wastewater collection, treatment and disposal facilities, or no centralized wastewater facilities at all. Under-performing

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wastewater facilities can pose significant public health and water quality impacts and adversely affect beneficial uses of surface water and groundwater. Further, these dilapidated wastewater facilities can stymie community infrastructure improvements such as new schools, hospitals and public restrooms. Staff from the Discharge to Land Program provide permit compliance assistance to these communities and assist them in securing technical and financial assistance for water quality improvement and infrastructure projects that will achieve water quality and public health improvement throughout the North Coast Region.

More information on this subject and links to regionwide analysis on DACs can be found on the Environmental Justice webpage at [Environmental Justice | California Northcoast Regional Water Quality Control Board](#).

Wastewater Consolidation Program for DACs

Beginning in FY 2021-2022, Region 1 will begin its participation in the statewide Wastewater Consolidation Program. The Program, established under Senate Bill 1215 (SB 1215), which in 2018 modified the Porter-Cologne Water Quality Control Act (Chapter 4.3, commencing with Section 13288) authorized Regional Water Boards to encourage, and if necessary, mandate the provision of sewer service to disadvantaged communities with inadequate onsite sewage treatment systems. In 2021, Region 1 received approval to fill a position authorized by SB 1215 to implement this new law. Once this position is filled, the new staff engineer will begin coordinating with the sewer consolidation working group, a multi-region team developing the consolidation guidelines. In addition to commencing with early implementation of the new SB125 regulations, the new engineer will also begin coordination on state funded sewer consolidation projects and related wastewater disposal projects implementing the Russian River Watershed Pathogen TMDL.

Unstaffed Waste Discharge to Land Sub-Programs

Due to program resource limitations, the Waste Discharge to Land Program will be unable to provide significant oversight for the following subprograms and subprogram tasks:

- Septage disposal projects and existing permits
- Active mines regulated under WDRs
- Abandoned and unregulated mines
- Sanitary sewer collection system inspections and audits
- Review and compliance follow-up of facility self-monitoring reports

1.4 Solid Waste Disposal Program

1.4.1 Program Overview

The Solid Waste Land Disposal Program oversees the discharge to land of certain solid or liquid wastes. These wastes include municipal solid waste (MSW), hazardous wastes, designated wastes, nonhazardous, and inert solid wastes. In general, these wastes cannot be discharged directly to the ground surface without adversely affecting groundwater or surface water, and therefore must be contained in waste management units to isolate them from the environment. The land disposal program is a United States Environmental Protection Agency (USEPA) approved program for implementing the USEPA RCRA Subtitle D regulations. California Code of Regulations (CCR) Title 27 contains the regulatory requirements for non-hazardous wastes. CCR Title 23 (Chapter 15) contains the regulatory requirements for hazardous wastes. These regulations prescribe standards for classifying waste; siting of waste management units; waste containment construction; operation; maintenance; closure; monitoring of the vadose zone, storm water, surface water, and groundwater; and requirements for corrective actions in the event of a release of waste constituents from the waste management unit (WMUs). The Regional Water Board implements these requirements through the adoption of waste discharge requirements and enforcement orders.

Increasing Federal and State requirements in the 1990s resulted in the stoppage of operations at many of the locally owned and operated municipal landfills throughout the North Coast Region prior to these landfills reaching full capacity of their existing WMUs. As a result, the region has one remaining operating municipal solid waste disposal site (SWDS): the Sonoma County Central Landfill, located near Cotati. Consequently, permitting workload for one Land Disposal Program staff includes the complicated and resource intensive process for permitting new WMUs (i.e., operating cells) at the Sonoma County Central SWDS or closure permitting. Staff permitting time necessarily prioritizes the open Central landfill and overseeing closed landfills that have not completed the construction of their final landfill cover system.

Review of closure reports and new WMU construction reports, which are the main documents used for permitting for these types of projects, are one of the biggest workloads staff face. A given closure plan/new cell construction report is a composition of multiple technical reports, all which must be reviewed for technical and regulatory compliance. Typical landfill components which require design review technical reports found within closure plans/new cell construction reports include final cover systems or base liner systems comprised of foundation layer, barrier layer(s), vegetation layer (for closure) or operations layer (for new construction); the leachate, collection, recovery, and storage systems (LCRS); surface water control systems; and landfill gas control systems. Other technical issues found within closure plans/new cell construction reports include slope stability calculations for both static and seismic conditions; CEQA compliance documents; other resource agency permits and their supporting documentation; assessment of material settling; a Construction Quality Assurance Plan (CQA Plan); and water balance models. These large projects require coordination with

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the local enforcement agency (LEA), CalRecycle, and air quality boards; multiple rounds of review, comments; and new submittal before they are accepted and the process of writing and bringing permits to the Regional Water Board for adoption.

Once the permit has been issued and construction of closure systems or new WMUs has begun, staff must maintain an active regulatory presence via inspections and review of daily field logs, monthly summary reports, CQA testing, and various specific reports required by the project CQA to verify that the project is being completed as proposed. Once the project construction is completed a final CQA report is submitted, which staff must review and approve and issue either Closure Certification or Waste Management Unit Certification.

Staff oversight of the remaining WMUs in the region, which include MSW landfills, wood waste disposal sites (WWDS), burn ash sites (BAS), waste piles, land treatment units, and now compost facilities is ongoing. For these facilities, staff conducts routine site inspections, continues oversight of landfill environmental control systems, reviews self-monitoring and other technical reports, reviews and revises monitoring and reporting programs, continues oversight of any post-closure maintenance issues, and evaluates adequacy of environmental controls for development encroachment in accordance with Land Disposal Program priorities.

In addition to the active regulated facilities managed by staff, historic, non-active sites commonly demand staff time as part of various development projects, third-party inquiries, and other land use issues. Because Land Disposal Program staff are not initiating or directing these projects, they are rarely accounted for in staff work plans. Moreover, these projects are often time-sensitive and demand staff attention to prevent project delay or an unintended environmental release.

The number and types of facilities regulated under the Land Disposal Program include:

- Municipal Solid Waste Landfills (18)
- Wood Waste Disposal Sites (25)
- Burn Dumps/unregulated (110)
- Land Treatment Units (1)
- Active Mines (2)
- Inactive or Abandoned Mines, not currently regulated under WDRs (45)
- Surface impoundments, Class II (2)
- Waste piles (1)
- Compost Facilities (5)
- Other (8)

Due to program resource limitations, the Solid Waste Program will be unable to provide significant oversight for the following subprograms and subprogram tasks:

- General Order enrollment and oversight for composting operations
- Routine case management for facilities located in Northern counties

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- Revisions to existing MRPs
- Review of financial assurance documents
- Responding to complaints or conducting enforcement
- Development of General WDRs for landfill operations or expansion and closure construction
- Oversight of landfill post closure land use and development
- Oversight of Solid Waste Assessment Test (SWAT) program sites, PFAS concerns for old landfills and burn dumps
- Integrating program into coordinated databases consistent with GeoTracker Initiative
- GeoTracker database cleanup and refining
- Tracking and providing input on legislative changes to the industry on evolving waste management concepts such as zero waste, anaerobic digesters, soil waste piles diversion
- Routine coordination with each County Local Enforcement Agencies

1.5 Underground Storage Tank/Site Cleanup/DoD Programs

Petroleum Underground Storage Tanks (USTs) are a historical source of groundwater pollution. Most UST hold or held fuel, which is the main emphasis of this program (other pollutants are covered by the Site Cleanup Program). Under State law USTs need to be monitored for leaks (monitoring is administered by local agencies). If leaks are discovered, Regional Board staff, working with local agencies, require a subsurface investigation, removal of subsurface structures, cleanup of secondary sources and monitoring of groundwater. In the North Coast, Regional Water Board staff works in partnership with only one Local Oversight Program (LOP) to oversee the cleanup of UST sites in Sonoma County. The Sonoma County Department of Health Services, Environmental Health Division is the LOP certified by the State Water Resources Control Board to oversee the implementation of UST cleanups. The Regional Water Board serves as the oversight agency of the Sonoma County LOP.

The Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of 'non-federally owned or used' sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, industrial manufacturing and maintenance sites, dry cleaners, lumber mills, and bulk fueling facilities. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are diverse and include solvents, pesticides, heavy metals, and fuel constituents.

For Region 1 the Department of Defense (DoD) Cleanup program includes only Formerly Utilized Defense Sites (FUDS) which are facilities that were owned, operated, or leased by a branch of the DoD for various uses such as missile silos, gun batteries, listening posts, and radar stations. Soil and groundwater cleanup activities at Departments of Defense facilities are regulated in conjunction with the California

Department of Toxic Substances Control (DTSC). Cleanup of DoD facilities must comply with Water Board policies and directives to protect water quality, beneficial uses, and environmental/ecological health. Areas of concern include soil and groundwater contamination, storm water and surface water discharges, and contaminated sediments.

In all the cleanup programs, impacts and potential impacts must be considered for groundwater, surface water, soil, soil gas, and indoor air vapor intrusion. For groundwater and surface water, our Basin Plan, the Water Code, the Health and Safety Code, and State Water Board policies are used in evaluating impacts. CalEPA and DTSC guidance documents are used when evaluating soil, soil gas, and indoor air exposure pathways.

As of June 2021, there are 174 open UST program sites, 237 SCP sites, and approximately 50 DoD program sites (with multiple subsites at some formerly used defense sites) in the North Coast region.

1.6 Groundwater Protection Program

The goal of the groundwater protection program is to preserve and maintain high quality groundwater and to restore degraded groundwater. The Regional Water Board protects groundwater through several programs that are responsible for developing and implementing plans & policies, waste discharge requirements, groundwater investigations and cleanups, and enforcing water code violations.

A priority project identified by the Board in Resolution R1-2021-0006 is the development of a groundwater protection policy. A Groundwater Protection Strategy began as part of the Triennial review in 2007 and included revisions to chapter 3 (water quality objectives). Due to the large scope of work, the project was divided into two phases: Phase I involved updating the water quality objectives and phase II includes the development of a groundwater protection policy. Phase I was completed with the adoption of Resolution No. R1-2015-0018 in June 2015.

In 2015, the Regional Water Board staff formed the Groundwater Strategic Team to support efforts in groundwater resources preservation, protection, and remediation. The Groundwater Strategic Team expanded the vision of the groundwater protection policy to include other regulatory and non-regulatory elements. To capture these other regulatory and non-regulatory elements, the project was renamed as the North Coast Groundwater Protection Strategy. The strategy is intended to prioritize, coordinate, and implement Regional Water Board tools² and statewide tools³ for the protection of

² Existing regulatory and non-regulatory tools include development or revision of water quality standards, policies, and prohibitions (basin plan amendment); monitoring and assessment; issuance of waste discharge requirements; and enforcement actions.

³ Local and statewide activities of importance include: DWR's groundwater management planning; SWRCB's salt and nutrient management planning under the

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groundwater quality on a basin wide scale with the goal of protecting ecosystem function and advancing the human right to clean water under current and future climatic conditions.

The strategy includes the following five components:

1. Groundwater Protection Programs
2. Groundwater Ambient Monitoring and Assessment (GAMA) Program
3. Statewide Policies and Regional Planning
4. Data Driven Adaptive Management
5. Partnering

The Groundwater Strategic Team identifies opportunities to better protect water resources and provides resources (in the form of data and background materials) needed to support basin planning, basin-scale assessment, discharge permitting and remediation efforts. The Team serves as a forum through which Regional Water Board staff can share expertise and perspective. The following are priorities areas:

1. *Order Renewals*: Continue to update and renew orders that are protective of groundwater resources.
2. *Basin Scale Groundwater Evaluation and Prioritization*: Continued analysis and assimilation of data required to prioritize groundwater basins for management planning.
3. *Sustainable Groundwater Management Act (SGMA)*: In coordination with State Water Board and California Department of Water Resources, provide the local Groundwater Sustainability Agencies in the North Coast Region with water quality data, assessment tools, and water quality standards as they develop Groundwater Sustainability Plans.
4. *Periodic Meetings and Presentations*: The Groundwater Team meets periodically to hear presentations from Water Board staff, outside agencies, vendors, or consultants regarding water supply, groundwater protection, and/or groundwater cleanup issues. These meetings are a good opportunity to make contacts with other agencies and learn more about their interests/priorities regarding groundwater issues in the region.
5. *Policy Statement*: Develop a policy statement which will outline a range of strategies to protect high quality groundwater and improve degraded groundwater within the North Coast Region. The policy statement will express, in a resolution, an opinion of the Regional Water Board without having effect as regulation.
6. *Groundwater/Surface Water Interaction*: Develop strategies for integrating groundwater concerns into the management of watersheds, and vice versa.

To date the team has provided data analysis and/or recommendations for:

Recycled Water Policy; groundwater-surface interaction assessments; and statewide efforts to update groundwater monitoring protocols, data assessment and presentation tools.

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- NPDES facilities including Humboldt Creamery, Healdsburg, Forestville, Graton, Sonoma-West Holdings, Cloverdale, Ukiah, McKinleyville, and Ferndale
- State Water Board General WDR for Cannabis Cultivation
- Local Agency Management Plans (LAMPs) for Humboldt Co., Mendocino County, and Sonoma County
- Dairy Program general permit
- Draft Vineyard general permit.

The Groundwater Team did not convene in FY 2020-2021, but anticipates resuming its cross-program support functions in FY 2021-2022. Some of the projects that the Groundwater Team may provide input on include:

- Santa Rosa Plain Salt and Nutrient Management Planning
- Flow and Riparian Protection Program in the Scott and Shasta Watersheds
- Dredge spoils management in the Humboldt Bay Watershed
- Groundwater recharge and stormwater capture projects to support the Region's Climate Change Adaptation and Resilience Strategy

1.7 Agricultural Lands Discharge Program

1.7.1 Program Overview

The North Coast Regional Water Board implements a broad Agricultural Lands Discharge Program, which addresses water quality impacts associated with activities on agricultural lands in the North Coast Region. To prevent agricultural discharges from impairing the waters that receive these discharges, the Irrigated Lands Regulatory Program (ILRP) regulates discharges from irrigated agricultural lands. This is done by issuing waste discharge requirements (WDRs) or conditional waivers of WDRs (Orders) to growers.

There are approximately 350,000 acres of agricultural lands in the Region, which are primarily used for vineyards, orchards, row crops, grain, alfalfa, hay pasture, dairies, and lily bulbs. Agricultural discharges can contain pollutants such as pesticides, nutrients, organic matter, salts, pathogens, and sediment. These pollutants can harm aquatic life or make surface or groundwater unusable for drinking water or agricultural uses. Activities on agricultural lands can also result in the removal or suppression of riparian vegetation, which provides shade and other ecological functions to waterbodies. The Agricultural Lands Discharge Program is designed to meet the requirements of the California Water Code, the State Nonpoint Source Policy, and the Total Maximum Daily Loads (TMDLs) developed for certain watersheds in the Region.

The Agricultural Lands Discharge Program encompasses several separate Regional Water Board permits that address discharges of waste associated with agricultural lands. The scope of the program is defined by either the crop type or geographic location. Program management responsibilities for the ILRP are handled by the

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Groundwater Permitting Unit. Regional Water Board's activities associated with the Agricultural Lands Discharge Program are undertaken by the Cannabis and Enforcement Division and Nonpoint Source and Surface Water Protection Division. The North Coast Region has 0.75 PY dedicated to the ILRP with additional funding (0.25 PY) from the Waters Discharge to Land Discharge Program allowing for one full-time staff person. This staff person is now housed in the Groundwater Permitting Unit and the focus of current work is the development of a general permit for vineyard operations.

One additional staff from the Groundwater Permitting Unit has a portion (0.25 PY) dedicated to the ILPR. Under the technical guidance of the Watershed Stewardship Coordinator to establish a watershed stewardship framework that will address water quality problems associated with lily bulb cultivation in the Smith River Plain. The focus of current work is finalizing and implementing the draft Smith River Plain Water Quality Management Plan (SRPWQMP). Staff has come together with stakeholders as a Watershed Stewardship Team comprised of staff of NOAA Fisheries, the California Department of Fish and Wildlife, lily bulb growers, the Tolowa-Dee-ni' Nation, and the Smith River Alliance (a local nonprofit restoration group) to develop the draft SRPWQMP.

The SRPWQMP includes the implementation of management practices to reduce the delivery of copper and pesticides in runoff to surface waters, water quality sampling to track changes in water quality in response to implementation of the Plan, and a program of reporting to the public and Regional Water Board. Once approved by the Executive Officer, elements of the Plan will be used to develop a permit to address discharges of waste associated with lily bulb cultivation in the Smith River Plain and fully implement in the State's Nonpoint Source Policy.

Due to program resource limitations, the Agricultural Lands Discharge Program will be unable to provide significant oversight for the following subprograms and subprogram tasks:

- Development of General WDR for orchards and other irrigated agriculture sectors
- Vineyard complaint inspections
- Routine enforcement

2.0 DIVISION RESOURCES

2.1 Staffing

Three units and one specialist implement six distinct programs: (1) NPDES wastewater program, (2) NPDES municipal, industrial and construction stormwater program, (3) waste discharge to land program, (4) solid waste disposal program, (5) UST/Site Cleanup/DoD programs, and (6) groundwater protection program.

The three Division units tasked with implementing the above six programs are: 1) NPDES Unit, 2) the Groundwater Permitting Unit, and (3) Cleanups Unit. The groundwater protection specialist is responsible for developing and implementing our Region's groundwater protection program and provides technical assistance to division staff as needed.

Table 1 – Division Staff, Includes Management and Support Staff

Position	Name	Classification	PYs
Division Chief	Charles Reed	Supervising WRCE	1.0
Groundwater Specialist	Chris Watt	Senior EG (spec.)	1.0
NPDES Unit	Heaven Moore	Senior WRCE	1.0
NPDES Wastewater Program	Cathy Goodwin	WRCE	1.0
NPDES Wastewater Program	Matt Herman	WRCE	1.0
NPDES Wastewater Program	Justin McSmith	WRCE	1.0
NPDES Construction Stormwater Program	Josh Luders	WRCE	1.0
NPDES Industrial Stormwater Program	Farzad Kasmaei	WRCE	1.0
NPDES/Wastewater/Stormwater Program	Rhonda Raymond	SEA	1.0
NPDES Municipal Stormwater Program	Brendan Thompson	ES	1.0
Groundwater Permitting Unit	Jeremiah Puget	Senior ES	1.0
Solid Waste/Land Disposal Program	Terri Cia	EG	1.0
Solid Waste/Land Disposal Program	Vacant / On Hold	WRCE	1.0
WDR Waste to Land Program	Roy O'Connor	EG	1.0
WDR Waste to Land Program	Rachel Prat	ES	1.0
WDR Waste to Land Program / SB1215 Sewer Consolidation	Michael Reese	WRCE	1.0
Irrigated Lands Regulatory Program	Lynette Shipsey	WRCE	1.0
Irrigated Lands Regulatory Program/WDR Waste to Land Program	Ben Zabinsky	WRCE	1.0
Site Cleanups Unit	Heidi Bauer	Senior EG	1.0

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Position	Name	Classification	PYs
Site Cleanup/UST Program	Julie Duong	WRCE	1.0
Site Cleanup/UST Program	Craig Hunt	WRCE	1.0
Site Cleanup/UST/DoD Program	Tom Magney	EG	1.0
Site Cleanup/UST Program	Paul Nelson	EG	1.0
Site Cleanup/UST Program	Cody Walker	EG	1.0
Site Cleanup/UST Program	Kent Huth	EG	1.0
Site Cleanup/UST/DoD Program	François Bush	EG	1.0
Admin Support Staff	3 Staff	Administration	Variable
Scientific Aid	1 Scientific Aid (Nic Colbrunn)	Point Source Control & Groundwater Protection	
		Total:	26

During FY 2020-21, consistent with Governor Newsom’s annual budget that projected a severe budget shortfall resulting from the COVID-19 pandemic, budget cuts were realized across the Water Boards through a 10 percent reduction in staff time base, or the equivalent of a reduction of 16 hours of work time per month through the end of FY 2021-22. The FY 2020-21 Work Plan reflected this reduction in staff time base by reducing program tasks and work commitments, including program performance metrics, by 10 percent across all programs. At the time of the development of the FY 2021-22 Work Plan, this budget reduction program is still in effect. Accordingly, the FY 2021-22 Work Plan continues to reflect the 10 percent reduction on program metrics.

In addition to mandatory reductions in staff time base, four office staff were redirected for an estimated period of six to 12 months in FY 2020-21 for the COVID-19 contact tracing effort. One staff from the Point Source Control and Groundwater Protection Division was assigned to this effort. This staff is anticipated to return to full-time duties in the NPDES Storm Water Program for FY 2021-22.

This Work Plan’s PY allocation also reflects reduction of 0.2 PY per person year for each division staff for activities and leave that are not captured as program metrics, but are integral to the employment at the Water Board (vacation, holidays, sick leave, administrative tasks not related to regulated facilities, training, responding to public records act requests (PRAs), other unplanned work activities, etc.) and must be accounted for. This accounting consideration will enable program managers to establish program performance targets more accurately and will provide staff with meaningful and achievable performance targets.

3.0 NPDES WASTEWATER PROGRAM

3.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 2.

The NPDES Wastewater program will prioritize the renewal of high priority facilities, issuance of necessary new permits, and review of monitoring data for compliance determination.

Table 2 – FY 21/22 NPDES Wastewater Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	a. Prepare individual NPDES permits for new unpermitted facilities and new enrollments under General NPDES permits	Core	On-going
1	b. Renew existing individual and General NPDES permits for both major and minor wastewater facilities	Core	On-going
1	c. Conduct inspections for both major and minor wastewater facilities and enrollees under General NPDES permits to ensure compliance with permit requirements	Core	On-going
1	d. Enforcement	Core	On-going
1	e. Staff Supervision	Core	On-going
2	a. Case Handling	Core	On-going
2	b. Program Management and Implementation	Core	On-going
2	c. Participation in Development of Statewide General Orders and Initiatives	Core	On-going
2	d. Unplanned Work Activities	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

3.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 2 above.

1.a – Prepare new individual NPDES Permits and enroll facilities under General Permits

Summary: As permit applications are received, NPDES staff prioritize and review applications, notify the applicants of the completeness of the applications, work with applicants to obtain required information, and prepare waste discharge requirements based on complete applications. In FY 2021-22, Staff plans to begin development or bring to the board for its consideration three new individual NPDES permits (Fall Creek Hatchery, Mark West Quarry, and Nordic Aquafarms) to the Board. Permit development for the Fall Creek Hatchery and Mark West Quarry permits is planned to occur in FY 2021-22, but the permits will be brought for Board consideration and adoption in late 2022 or 2023. Permit development for the Nordic Aquafarms permit occurred in FY 2020-21. The proposed permit will be brought for Board consideration and adoption in FY 2021-22. However, the final number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and could change due to competing work priorities.

Key Issues to Resolve and Considerations: Program performance commitments reflect continuance of the 10 percent reduction in program performance metrics authorized by the State Water Board for FY 2021-22 due to the impacts resulting from COVID-19 and budget uncertainty. Lifting of the performance metric reduction by the State Water Board may allow program staff to exceed work plan commitments. Additionally, NPDES permits that authorize the production and use of recycled water may experience delays if a permittee must prepare a Title 22 Engineering Report and obtain the Report's approval from the State Water Board's Division of Drinking Water.

PY Allocation for FY 2021-22: 0.5

New NPDES Permits or Enrollments	Target Adoption Date
Nordic Aquafarms	Aug 2021
General NPDES Permit Enrollments	Ongoing

1.b – Renew existing individual NPDES permits

Summary: NPDES permits are renewed every five years. Based on a review of the region's existing NPDES permits, as well as the guidance from State Water Board and USEPA regarding renewal metrics, the impacts resulting from COVID-19, and budget uncertainty, NPDES Unit staff plans to renew a total of four individual NPDES permits during FY 2021-22 (1 major facility renewal, 1 new major facility, and 3 minor facilities) that will be brought for Board consideration and adoption. Additionally, depending on staff resources and projected timing, staff will work on the development of additional permits that will be brought for Board consideration and adoption in a following year.

NPDES Permits planned for Board Adoption	Target Date
Humboldt County Resort Improvement District No. 1 Shelter Cove Wastewater Treatment Facility (Minor)	October 2021
Mendocino City CSD (Minor)	December 2021
Covelo CSD (Minor)	Feb 2022
City of Eureka Elk River Wastewater Treatment Plant (Major)	April 2022

Key Issues to Resolve and Considerations: Program performance commitments reflect continuance of the 10 percent reduction in program performance metrics authorized by the State Water Board for FY 2021-22 due to the impacts resulting from COVID-19 and budget uncertainty. Lifting of the performance metric reduction by the State Water Board may allow program staff to exceed work plan commitments. Contractor consultant support which was previously provided to review Reports of Waste Discharge and generate draft permits has been discontinued. This additional workload will need to be handled by Staff. Additionally, NPDES permit renewals that authorize the production and use of Recycled Water may experience delays due to the need for the permittee to prepare and obtain approval from the State Water Board’s Division of Drinking Water of a Title 22 Engineering Report.

Our most experienced staff permit writer will be retiring at the beginning of FY 2021-22. While every effort will be made to fill this vacancy as quickly as possible, the new staff will need for training and onboarding. It is anticipated that this will likely impact the development of permits in FY 2021-22 that would be brought for Board consideration and adoption in a following year.

PY Allocation for FY 2021-22: 1.3

1.c – Conduct inspections and prepared compliance reports for major and minor wastewater facilities

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provides an opportunity for Regional Water Board staff to provide compliance assistance where needed. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. The Water Board’s Memorandum of Agreement with U.S. EPA specifies that minor facilities will generally be inspected once a year, as resources allow, but not less than once during the five-year permit cycle. Major facilities will generally be inspected once a year, as resources allow, but not less than once every two years. The ability to conduct in-person inspections was impacted significantly during FY 2020-21 and may continue to be impacted by COVID-19 and the associated

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public health orders in FY 2021-22. The table below indicates proposed inspections of three major and five minor facilities for FY 2021-22.

Key Issues to Resolve: State Water Board and U. S. EPA have given guidance to reduce program metrics by 15 percent due to the impacts from COVID-19 and budget uncertainty. The ability to conduct in-person inspections may continue to be impacted by COVID-19 and the associated public health orders.

PY Allocation for FY 2021-22: 0.3

Facility Inspection	Target Date
1. Santa Rosa Laguna Subregional Water Reclamation Facility (Major)	December 2021
2. Redway POTW (Minor)	December 2021
3. Shelter Cove POTW (Minor)	March 2022
4. City of Loleta (WWTP) (Minor)	March 2022
5. Mendocino City CSD (Minor)	March 2022
6. Eureka City Elk River WWTP (Major)	June 2022
7. City of Arcata (Major)	June 2022
8. City of Fortuna (Minor)	June 2022

1.d – Enforcement

Summary: Staff from the NPDES Unit works closely with the Enforcement Unit to address violations at permitted sites including completion of Administrative Civil Liability Complaints (ACLs) for discretionary permit violations, and Expedited Payment Letters/ACLs for permit violations subject to mandatory minimum penalties (MMPs) under Water Code section 13385. Coordination meetings are held between the units twice monthly. In FY 2021-22, NPDES Wastewater Program staff anticipate assisting Enforcement Unit staff in preparing MMP-ACLs for 9 NPDES facilities and assist preparing ACLs for discretionary permit violations, evaluating proposed resolution and participating in settlement discussions and/or enforcement hearings. Timely assistance from program staff help the Enforcement Unit meet its performance target of having “0 Facilities with Over \$12,000 in MMPs (4 or More Violations) Not Assessed within 18 Months of Accrual.”

Key Issues to Resolve: None

PY Allocation for FY 2021-22: 0.3

1.e – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and

performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve: None

PY Allocation for FY 2021-22: 0.5

2.a – Case Handling

Summary: Each NPDES Wastewater Program staff currently has assigned to them approximately 14 NPDES facilities, for which staff conducts routine case handling tasks throughout the fiscal year. Routine case handling includes self-monitoring report review and compliance determination, facility-related complaint and spill response, response to public inquiries, preparing informal enforcement actions (e.g., staff enforcement letters, NOVs), responding to Public Records Act requests, and maintaining the Region's electronic file management system.

Key Issues to Resolve: The ability to conduct in-person site visits and inspections may continue to be impacted by COVID-19 and the associated public health orders. In addition, the number and complexity of complaints, public inquiries and PRA requests, and the need for progressive enforcement is unpredictable in any given year and this uncertainty may result in reprioritization of the Unit's work activities and reallocation of PYs.

PY Allocation for FY 2021-22: 0.25

2.b – Program Management and Implementation

Summary: In FY 2021-22, Program staff will continue to work with facilities, State Water Board, and U.S. EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Tasks will likely include continued participation in statewide roundtables and subcommittees, continued development of template permit language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, California Coastal Commission, and U.S. EPA.

Key Issues to Resolve: In July 2020, the State Water Board issued investigative orders statewide to publicly owned treatment works (POTWs) with effluent flows greater than 1.0 million gallons per day to evaluate per- and polyfluoroalkyl substances (PFAS)

groundwater and surface water impacts and obtain a preliminary understanding of PFAS concentrations at wastewater treatment facilities. In the North Coast Region, 12 municipalities received this order, which requires the POTW to prepare work plans for monitoring wastewater influent, effluent, and biosolids and monitoring nearby groundwater wells potentially impacted by the treatment facility and its discharge. The amount of resource commitment from the NPDES Wastewater Unit for review of monitoring data collected for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert NPDES Wastewater Program staff resources away from other division priorities.

PY Allocation for FY 2022-23: 0.25

2.c – Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Wastewater Program staff are active participants in the statewide NPDES Wastewater Program. Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments as well as provide input on the development of statewide general orders and technical policy. In FY 2021-22, NPDES Wastewater Program staff will continue to participate in a special investigation currently being undertaken/led by the State Water Board to determine the presence of PFAS in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve: Limited staff resources and the uncertain impacts due to COVID-19 may limit participation in these efforts and required the prioritization of work associated with Region 1 performance targets.

PY Allocation for FY 2021-22: 0.2

2.d – Unplanned Work Activities

Summary: Like in all organizations, the best laid plans can be upset and derailed by unplanned work. Unplanned work may include work related to regional emergency response, last-minute requests from the State Water Board or elected officials, stakeholder demands, and other urgent work that requires producing information or other deliverable on short notice. These unexpected projects affect the ability of staff across all programs to meet planned work commitments or deliver work products on time.

Key Issues to Resolve and Considerations: Responding to unplanned work often requires that managers assess the urgency of the work and reprioritize workload and

project commitments. When unplanned work is determined to be of high importance, other planned work commitments may be delayed or not completed.

PY Allocation for FY 2021-22: Variable

3.3 Performance Targets

3.3.1 Reported to State Board via ORPP

The Performance Target for the NPDES Wastewater program that is reported to the State Water Board' Office of Research, Planning, and Performance (ORPP) is based on the number of major and minor wastewater facilities inspected and major and minor individual permits renewed. The following table shows our targets for FY 2021-22. The targets established in the table below are generally lower than the workplan commitments outlined above. This is to accommodate for potential impacts resulting from COVID-19 and budget uncertainty, unplanned work activities and unanticipated shifting program priorities.

Performance Targets for the last FY and proposed for FY 2021-22

Fiscal Year	Major Facility Inspections	Major Facilities Permits Renewed/New	Minor Facility Inspections	Minor Facilities Permits Renewed/New
Target 2020-2021	3	2	4	5
Actual 2020-2021	0	2	1	5
Target 2021-2022	4	2	4	3

The Performance Target for the NPDES Wastewater program as set by U.S. EPA is adoption or rescission of 20 percent of active NPDES permits nationwide. As of June 1, 2021, Region 1 has 41 active NPDES permits. Therefore, the performance metric is expected to be 8 permits adopted, renewed, or rescinded. Staff project that the U.S. EPA performance target will be met in FY 2021-22. However, this Work Plan reflects the full staff allocation of available staff hours as determined using the State Water Board's Target Tool, which results in five new or renewed NPDES permits in FY 2021-22.

4.0 NPDES STORM WATER PROGRAM

4.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 3. Most are described in detail in Section 4.2.

In FY 2021-22, the municipal storm water program will prioritize the development and reissuance of the Phase 1 MS4 Permit, as well as continue to take an active role in the oversight of the Phase 1, Phase 2, and Caltrans permit implementation and continuing participation with State Board and the other regions on coordination of permit implementation and renewal efforts.

The construction and industrial storm water program will continue to prioritize, evaluate, inspect, provide compliance support, and apply progressive enforcement on high priority sites, as well as focusing on sites that have exceeded Numeric Actions Levels (NAL), failed to collect samples, or have insufficient Storm Water Pollution Prevention Plans. Additionally, work will be done to identify sites with high pollutant generating source to ensure that proper sampling and BMP implementation and maintenance occur.

Specifically sites that have reported high NAL exceedances for Aluminum, have outstanding corrective actions, have been identified by local municipalities and/or sister agencies, and those sites that have filed for NEC status will be a priority for staff inspection.

In addition, focused work is being done to coordinate with county staff who administer the SMARA (Surface Mining and Reclamation Act) programs for surface mining within the region. This cross-referencing effort helps to identify high priority non-filers and ensure they are appropriately enrolled and protecting water quality.

Table 3 – FY 2020-21 NPDES Storm Water Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	a. Manage NPDES permit NOIs and NOTs	Core	On-going
1	b. Conduct site and facility inspections	Core	On-going
1	c. Conduct enforcement actions	Core/Special	On-going
1	d. Conduct general case handling tasks	Core	On-going

Priority Level	Activity/Project	Category	Target Date
1	e. Participation in Development of Statewide General Orders and Initiatives	Core	On-going
1	f. Renew Phase I MS4 Permit	Core	May 2022
2	a. Staff Supervision	Core	On-going
2	b. Conduct Stakeholder Outreach	Core	On-going
2	c. Unplanned Work Activities	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

4.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 3 above.

1.a – Manage NPDES Storm Water Permit Notices of Intent (NOIs) and Notices of Termination (NOTs)

Summary: NPDES Stormwater Program staff plan to enroll under the Phase I Permit three existing, but currently unpermitted, entities: Sonoma Marin Area Rail Transit (SMART) Train, Sonoma State University, and Santa Rosa Junior College. Enrollments and terminations of coverage under the statewide Industrial General Permit and the statewide Construction General Permit occur throughout the year.

Key Issues to Resolve and Considerations: The NPDES Stormwater Program currently has limited staff resources relative to the number of regulated facilities: 1.0 PY dedicated to implementing the MS4 program with 22 permittees, 1.0 PY to implement the Industrial Storm Water Program with 494 facilities enrolled, and 1.0 PY to implement the Construction Storm Water Program with 241 construction sites enrolled in the North Coast Region. In addition, one technical support staff which was originally anticipated to support the storm water programs has been reassigned to the COVID Tracer effort which has been extended indefinitely. Further, the work effort to enroll and terminate enrollees is unpredictable and may continue to be impacted by COVID-19 and the associated public health orders.

To complete high priority tasks, support may be provided by redirecting staff from other programs and/or utilizing technical assistance from U.S. EPA to conduct inspections and support enforcement efforts. Management will continue to pursue the option of hiring a scientific aid and/or other staff when feasible.

PY Allocation for FY 2021-22: 0.25

1.b – Conduct Site and Facility Inspections

Summary: A core responsibility of NPDES Storm Water Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements. The Industrial and Construction Programs each must meet a target of 40 inspections, and the MS4 Program must complete 1 Municipal inspection. In addition to a physical site inspection, inspections include a thorough review of the site/facility file, relevant work plans, monitoring reports, and Storm Water Pollution Prevention Plans.

Key Issues to Resolve and Considerations: As summarized in 1.a, the NPDES Stormwater Program has limited staff resources relative to the number of regulated facilities. The ability to conduct in-person inspections in FY 2021-22 may continue to be impacted by COVID-19, which may result in fewer completed inspections that targeted for FY 2021-22.

PY Allocation for FY 2021-22: 0.75

Milestones	Target Date
Conduct Site and Facility Inspections	On-going

1.c – Conduct Enforcement Actions

Summary: Currently, two Unit Supervisors (NPDES Unit and Groundwater Permitting Unit Seniors), the Division Chief, and primarily stormwater program staff are allocating time to six high priority enforcement actions in the Industrial and Construction Stormwater Programs that are being handled with the assistance of the State Water Board's Office of Enforcement and our Enforcement Unit. One of these cases is currently in settlement negotiations and another is pending a petition process. The others are in various stages of the enforcement process. Additional enforcement actions are expected to occur during FY 2021-22. Enforcement actions may include one or multiple site inspections, collecting samples, writing enforcement documents, providing compliance assistance, and developing formal enforcement documents (i.e. cleanup and abatement orders, cease and desist orders, informational orders, administrative civil liability complaints, settlement agreement and stipulated orders), briefing materials for management, and board presentations.

Key Issues to Resolve and Considerations: The work effort to complete formal enforcement actions is resource-intensive and to some extent unpredictable depending on discharger willingness to come into compliance and to settle alleged violations. Unexpected complications in development of formal enforcement actions have the potential to delay completion of an enforcement action or settlement may result in early completion of the action. If resolution of any of the enforcement cases is through adjudication by the Regional Water Board at a public hearing, additional staff resources will be needed, and other program priorities may not be completed.

PY Allocation for FY 2021-22: 0.6

Milestones	Status
Construction General Permit Action #1	Active
Construction General Permit Action #2	Active
Construction General Permit Action #3	Active
Industrial General Permit Action #1	Active
Industrial General Permit Action #2	Active
Industrial General Permit Action #3	Active
Other enforcement actions	On-going

1.d – Conduct General Case Handling

Summary: General (non-enforcement) case handling tasks include spill response, regular meetings with Permittees, CEQA project review, Low Impact Development (LID) plan review, reviewing and approving submittals through SMARTS, responding to PRA requests, providing technical guidance to enrollees, and responding to public inquiries.

Key Issues to Resolve and Considerations: The ability to conduct in-person site visits and inspections may continue to be impacted by COVID-19 and the associated public health orders.

PY Allocation for FY 2021-22: 0.25

Milestones	Target Date
Conduct General Case Handling	On-going

1.e – Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Storm Water Program staff are active participants in the statewide NPDES Storm Water Program. In FY 2021-22, NPDES Storm Water Program staff will continue to take an active leadership in the continuing participation with State Board and the other regions on coordination of permit implementation and renewal efforts on the statewide subcommittee for the Industrial Storm Water Permit, as well as the ongoing subcommittee for the statewide CalTrans MS4 Permit. In addition, staff will be supporting the implementation of the CalTrans MS4 Permit, the Construction General Permit, and the Phase 2 MS4 permit, all of which are anticipated to be renewed and reissued this coming year. This effort by staff to invest time and provide technical and implementation expertise is critical to the development of clear, implementable, and enforceable permits.

Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments and developing statewide general orders and technical policy.

Key Issues to Resolve and Considerations: Program staff’s participation in the development of statewide orders and initiatives may be curtailed if staff are directed to high priority tasks, such as storm water enforcement.

PY Allocation for FY 2021-22: 0.15

Milestones	Target Date
Participate in statewide efforts	On-going

1.f – Renew Phase I MS4 Permit

Summary: The North Coast Region’s Phase I MS4 permit was administratively extended after it expired in January 2021. NPDES Storm Water Program staff will continue to work in FY 2021-22 on renewal of this permit, which is planned for Board hearing in the third quarter of FY 2021-22.

This work includes drafting of new permit language, collaboration with Co-Permittees at least twice a month, internal coordination and statewide coordination regarding monitoring, TMDL implementation, CWA Section 401 requirements, legal issues, LID requirements, database tracking and reporting, cost of compliance, assessment management requirements, pesticide use, and trash requirements. The process is likely to include a public workshop and significant public comment.

Key Issues to Resolve and Considerations: The NPDES Stormwater Program currently has 1.0 PY dedicated to implementing the MS4 program in the North Coast Region. Competing work priorities, such as the reissuance process and implementation of the CalTrans and Phase 2 MS4 Permit, for the Municipal Storm Water Program have the potential to delay work on this permit renewal.

PY Allocation for FY 2021-22: 0.75

Milestones	Target Date
Phase I MS4 Permit development, prepare administrative draft	May 2022

1.g – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to

ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.5

2.a – Conduct Stakeholder Outreach and Public Engagement

Summary: Stakeholder outreach is key to the successful implementation of storm water management under both the statewide general permits and individual NPDES permits. Public outreach and early engagement are proven strategies to inform stakeholders about the need to manage stormwater and the benefits of doing so and educate the regulated community about the requirements of the permits for storm water. The intended tasks include proactive engagement with new permittees, qualified industry-specific consultants, existing industry groups such as contractor groups, builders’ associations and commercial sea food processors, municipal building and engineering inspectors, and schools, as well as staff participation in trainings and conferences for storm water professionals (e.g., CASQA).

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.25

Milestones	Target Date
Coordinate with permittees, stakeholders, and the public	On-going

2.b – Unplanned Work Activities (see previous)

PY Allocation for FY 2021-22: Variable

4.3 Performance Targets

4.3.1 Reported to State Board via ORPP

Performance Targets for the last FY and proposed for FY 2021-22

Fiscal Year	Municipal Phase I/II Inspections	Construction Inspections	Industrial Inspections
Target 2020-21	4	40	40
Actual 2020-21	0	27	19
Target 2021-22	1	40	40

In FY 2019-20, storm water program significantly increased the number of storm water inspections to have a greater onsite presence, using both storm water staff and internal staff from other programs within the Division. In FY 2020-21, this team worked diligently to inspect construction sites and industrial facilities and conduct necessary enforcement actions. However, staff's ability to conduct inspections, especially of industrial facilities and municipalities, was significantly impacted by COVID and the resulting stay at home orders, and business closures. The FY 2021-22 inspection targets are set to the pre-COVID targets, with the expectation that COVID restrictions will be removed or significantly reduced this fiscal year.

Currently the only metrics tracked by the State Water Board are those included in the table. However, it should be noted that as determined using the State Water Board's Target Tool that conducting case management of the 22 MS4 Permittees, writing the new Phase 1 permit, and conducting one MS4 Phase 2 inspection and 40 inspections in the Industrial and Construction Programs respectively would require a staff allocation of 7 PYs in FY 2021/22. The Region 1 stormwater program currently has a total of 3 PYs. This discrepancy is further exacerbated by the reductions due to COVID.

5.0 WASTE DISCHARGE TO LAND PROGRAM

5.1 Core Activities and Projects by Priority

The Waste Discharge to Land Program staff has identified the following priorities for FY 2021-2022:

- 1. Support disadvantaged and Tribal communities by providing technical support and coordinating funding opportunities with the Division of Financial Assistance (DFA).* Region 1 has developed a priority ranking for DAC and SDAC infrastructure improvement projects within Region 1 based on pertinent criteria such as public health risk, project feasibility, threat to surface water and groundwater quality, readiness to proceed, and community support. Some screening criteria are weighted higher, such as expected water quality improvement and threat to water quality, due to their significance to public health and water quality protection. In ranking projects, staff also considered a facility's history of water quality violations and staff's assessment of the quality and feasibility of the project scope of work. Currently, the priority list includes 29 small DACs and Tribal projects that are in the planning or construction phase. In FY 2021-22, staff will focus its limited staff resources on supporting projects identified as high priority projects by the priority ranking effort.
- 2. Address the backlog of enrollments for facilities eligible for the Small Domestic Wastewater WDR, biosolids, and develop a transition plan for the wineries into the new statewide general order.* To make most efficient use of limited staff resources, the Discharge to Land Program intends to maximize use of available statewide

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general WDRs for new applications for waste discharge and for replacing existing WDRs whose requirements are significantly outdated. For FY 2021-22, staff plan to update permitting for the City of Point Arena WWTP and Vintner Inn WWTP and continue evaluating older WDRs for municipal/domestic wastewater and winery facilities and prioritizing WDRs for future permit updates. The regulatory program for wineries in Region 1 currently utilizes four existing regulatory measures including: a 2002 General Order for Wineries; the 2016 Wine, Beverage and Food Processor (WBFP) General WDR and Waiver of WDRs; and over 30 individual WDRs. In FY 2021-22, staff will propose rescission of the 2002 General Order and will evaluate which WBFP enrollees and individual Orders should be transitioned into the new statewide General WDRs for Winery Process Water, which was adopted by the State Water Resources Control Board January 2021 and will be available for winery enrollment in early FY 2021-22.

3. *Approve Local Agency Management Plans (LAMPs) for Sonoma and Siskiyou Counties pursuant to the Onsite Wastewater Treatment Systems (OWTS) Policy.* Approval of these LAMPs allows these local agencies to approve and manage the installation of new and replacement OWTS with domestic wastewater flows less than 10,000 gallons per day for OWTS within their jurisdiction. This new approval authority will enable the Discharge to Land Program to transition several OWTS from Regional Water Board permitting to local oversight and to focus Program resources on Regional Water Board permitting and oversight of larger wastewater facilities throughout the Region. The Sonoma LAMP will incorporate the Russian River Watershed Pathogen TMDL Action Plan's Advanced Protection Management Plan (APMP) in the lower Russian River, which will address failing septic systems that may be contributing to the surface water impairment.
4. *Implement Statewide GeoTracker Initiative.* Statewide, the efficient management of the Waste Discharge Requirements (WDR), Irrigated Lands, Land Disposal, and Recycled Water Program (collectively, (Programs)) is challenged by the lack of staff resources and expertise to manage a continual increase in the number of orders overseen by program staff, an increase in complexity of order requirements, lack of a comprehensive data management systems, user friendly case management tools, data evaluation tools, or automated processes that could help streamline processes and decision making regarding priorities. Currently, there are no automated processes available through any management systems to assist staff in entering data, processing routine letters, issuing notices of applicability, etc. Program staff inconsistently use at least three different data management systems (ECM, CIWQS, and GeoTracker) to store, track, manage, and implement program requirements. The Program staff and stakeholders statewide use these systems differently and the quantity and quality of electronic data required, managed, and made public varies greatly. These inconsistencies hinder staff's ability to efficiently issue orders, add complexity to staff and dischargers' ability to achieve compliance with order requirements, and obscures transparency with the public.

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Regional Water Board staff are collaborating with State Water Board program staff and the Department of Information Technology (DIT) developing and implementing data management efficiencies and processes that optimize staff resources and ensure discharges are complying with their orders to protect and restore water quality. When the Program strategy is implemented, program staff will maintain consistent facility records, use automated tools to document missing report filing and responses, utilize Program water quality data to inform compliance, prioritization of tasks, and decision-making, and provide open and transparent public access to facility information and water quality data. When the Program Strategy is implemented, program staff and dischargers will require additional time and resources for internal training and outreach to discharges that are affected by the changes in reporting requirements.

The core activities and special project of program staff are categorized based on priority listed in Table 4 and are described in detail in Section 5.2.

Table 4 – FY 2020-21 Program Core Activities and Projects by Priority

Priority Level	Activity/Project⁴	Category	Target Deadline
1	a. Prepare New WDRs and General WDR Enrollments	Core	Ongoing
1	b. Prepare Revised WDRs and Rescission Orders for existing Facilities	Core	Ongoing
1	c. Provide technical and compliance assistance to Disadvantaged Communities	Special	Ongoing
1	d. Conduct stakeholder outreach for Russian River Watershed Pathogen TMDL Early Implementation	Special	Ongoing
1	e. Review/Approve Local Agency Management Programs	Special	Ongoing
1	f. Staff Supervision ⁵	Core	On-going
2	a. Review Self-Monitoring Reports and Conduct Follow up	Core	Ongoing

⁴ The waste discharge to land program has three funded positions. Each position has an administrative overhead cost, such as leave time, of approximately 0.2 PY per staff (approximately 0.6 PY for three program staff).

⁵ For overall program management and staff supervision, 0.2 PY has been allocated for the Unit senior. Another 0.1 PY of Unit senior time is allocated to Activities 1.d and 2.b, for a total of 0.4 PY for the Waste Discharge to Land Program.

Priority Level	Activity/Project ⁴	Category	Target Deadline
2	b. Respond to State Water Board WDR Program requests and participate in development of statewide general permits	Special	Ongoing
2	c. Conduct Facility inspections and prepare inspection reports	Core	Ongoing
2	d. Case handling, responding to complaints, and emerging Facility issues	Core	Ongoing
3	a. Unplanned Work Activities	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

5.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 4 above.

1.a – Prepare New WDRs and GWDRs Enrollments

Summary: As permit applications are received, Groundwater Permitting staff prioritizes and reviews applications, notifies the applicants of the completeness of the applications, works with applicants to obtain required information, and prepares waste discharge requirements based on complete applications. In FY 2021-22, staff plans to prepare two new draft individual WDRs for Board consideration and adoption and an undetermined number of new enrollments under general WDRs. The number of new permits and enrollments completed during any fiscal year is highly unpredictable because it is dependent on the number of new applications received during the fiscal year and the status of newly adopted or revised general permits. Compared to individual WDRs, general WDRs have more streamlined monitoring and reporting requirements and are generally more up to date with current regulatory requirements. This shift from individual permits to general enrollments changes Unit staff's focus to long-term case management and facility oversight as opposed to individual permit adoption.

Key Issues to Resolve and Considerations: Due to limited staff resources, Groundwater Permitting staff often need to balance competing work priorities that may result in delays developing or amending WDRs. In some instances, factors beyond staff's control, such as natural disasters, planned power outages, facility treatment and disposal changes, property transactions, funding delays, and litigation can create delays in scheduling board agenda items.

The new statewide General Order for Winery Process Water allows a three-year enrollment period for unpermitted facilities and is intended to be the applicable regulatory mechanism for all wineries in California. However, the State Water Board notes that the General Order defers the timeline and necessity for transitioning wineries

with existing regulatory coverage to the Regional Water Boards. Currently, wineries in the North Coast Region are regulated under individual WDRs, the General WDR for Wineries (R1-2002-0012), the General WBFP WDR (R1-2016-0002) and General WBFP waiver (R1-2016-0003). With the adoption of the statewide winery general permit⁶, staff are developing a transition plan for winery enrollment in fiscal year 2021-22. Therefore, this fiscal year groundwater permitting unit staff will be evaluating facilities with no coverage, and those with existing coverage, to develop a strategy for enrollment and enforcement for non-filers. Developing the transitions plan for wineries will require stakeholder outreach and will be a multi-year program of implementation.

PY Allocation for FY 2021-22: 0.6 (0.5 PY allocated to WDR staff, with 0.15 PY overlapping from DAC support for Willow Creek CSD; and 0.1 PY allocated to SB1215 staff for onboarding training on the permitting process, internal review process, basic legal authorities, and applicable regulatory measures.)

New WDR Order Issuance	Target Date
Willow Creek CSD	December 2021
Roblar Road Quarry	August 2021
General WDR Order Enrollments	On-going

1.b – Prepare Revised WDRs and Rescission Orders for Existing Facilities

Summary: Unlike NPDES permit, which are renewed every five years, non-NPDES WDRs continue in force until they are rescinded or revised. Non-NPDES WDRs are periodically reviewed to reaffirm the adequacy of the WDRs and to determine whether the WDRs should be revised to incorporate new regulatory or policy changes that have occurred since the WDRs were originally adopted or last reviewed. Based on a review of the region’s existing WDRs, the Groundwater Permitting staff plans to update two individual WDRs, one multi-facility recession order, and begin working on renewal of the low threat waiver of waste discharge requirements for specific categories during FY 2021-22. Updates are planned for the following facilities:

Existing WDR Order Revision	Target Date
City of Point Arena WWTP	April 2022
Happy Camp WWTF	June 2022
WDR Multi-Party Rescission Order	June 2022
Conditional Waiver of WRDs for Specific Categories of Low Threat Discharges	December 2022

In some cases, particularly for low threat discharges, facilities regulated under individual WDRs may be more appropriately regulated under the statewide general WDRs for

⁶ The Agricultural Lands Program has two funded positions. Approximately 0.3 PY of this funding is dedicated to Discharge to Land Program activities.

small domestic wastewater treatment systems or by a local regulatory agency where the local agency has oversight authority under the OWTS Policy. Where regulation of a facility is transferred from individual WDRs to coverage under general WDRs, the individual WDRs must be rescinded by the Regional Water Board at a public hearing. The Groundwater Permitting Unit anticipates preparing one large rescission order during FY 2021-22 that will rescind up to ten existing individual WDRs, primarily for OWTS with wastewater flows under 10,000 gallons per day which are eligible for oversight by a local agency and wineries that are eligible for regulation under the regional general order for wine, beverage, and food processors (WBFP), or the newly adopted statewide winery general permit. Over time the state has shifted from individual facility orders to regional and statewide general orders. This shift creates a demand for staff to oversee enrollments and facility compliance. This also creates opportunities to enroll facilities and rescind outdated individual or general orders to update water quality protection requirements.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources, competing priorities, and emerging permit issues, WDR reviews and updates for out-of-date WDRs are subject to delays. Also, updates to WDRs that authorize the production and use of recycled water may experience delays due to the need for the Permittee to prepare and obtain approval from the State Water Board's Division of Drinking Water of a Title 22 Engineering Report prior to adoption of WDRs.

PY Allocation for FY 2021-22: 0.4 (Additional 0.1 PY allocated to the Sci Aid developing the rescission order)

1.c and d – Conduct Technical and Compliance Assistance to DACs and Stakeholder Outreach for Russian River Watershed Pathogen TMDL Implementation

Summary: The Groundwater Permitting Unit will continue efforts providing technical and compliance assistance to disadvantaged communities (DACs) to advance the Human Right to Water and to improve access to public funding for wastewater treatment and disposal projects. Unit staff is currently assisting over 25 local agencies that have applied for public funding assistance through the California Clean Water State Revolving Fund (Small Community Grant Program). Also expected in FY 2021-22 is continued early implementation activities for the Russian River Watershed Pathogen TMDL, work that includes public outreach to owners of onsite wastewater treatment systems (OWTS) in the lower Russian River area and coordination with local agencies and other stakeholders identified as implementing entities in the TMDL Action Plan. Groundwater Permitting Unit staff will begin preparation of the Regional Water Board OWTS Assessment Program. The OWTS Assessment Program is a resource intensive effort to assess the operational status of OWTS in over 45,000 parcels in the Watershed during the first phase of the Program. Implementation of this program is expected to require increasingly larger staff resources beginning in FY 2021-22.

Key Issues to Resolve and Considerations: Currently, the Unit Supervisor, Division Chief, and one technical staff are allocating time to these high priority tasks instead of other core activities such as inspections, SMR review, and WDR reissuance. The commitment of staff time for these Special Projects, diverting resources from core activities, is unsustainable. Beginning in FY 2021-22, the North Coast Regional Water Board will have an additional 1.0 PY to implement new sewer service authorities for DACs provided by Senate Bill 1215 (Hertzberg), which was signed into law and became effective on January 1, 2019. A portion of this 1.0 PY will be dedicated to development and implementation of sustainable wastewater solutions (e.g. OWTS upgrades, septic to sewer projects) in Russian River Watershed communities including DACs.

PY Allocation for FY 2021-22: 0.7 (0.3 PYs for technical and compliance assistance to DACs by WDR staff, 0.2 PY for technical assistance to DACs by SB 1215 staff and 0.2 PYs for Russian River TMDL implementation by SB 1215 staff. Additional time, up to 0.2 PY may be contributed from Unit senior and Division Supervisor, as needed)

1.e – Review/Approve Local Agency Management Programs

Summary: The OWTS Policy authorizes local agencies to regulate new and replacement OWTS using a Local Agency Management Program (LAMP) consistent with Tier 2 of the OWTS Policy instead of regulating new and replacement OWTS under the OWTS Policy's more prescriptive Tier 1 requirements. Prior to local agency implementation of a LAMP, the draft LAMP must be reviewed by Regional Water Board staff and approved by the Regional Water Board or the State Water Board. As of the beginning of FY 2019-20, Humboldt County and Mendocino Counties are implementing approved LAMPs. Staff expects the County of Sonoma to complete its public process by the end of calendar year 2021 to finalize a draft LAMP and OWTS Manual for their submission to the Regional Water Board for approval. A public hearing for the Regional Water Board to consider a resolution approving the Sonoma County LAMP is expected to occur in FY 2021-22. The Counties of Del Norte and Siskiyou have also submitted draft LAMPs to the Regional Water Board for approval. Groundwater Permitting Unit staff anticipates ongoing work with staff from these local regulatory agencies to finalize the draft LAMPs and prepare Regional Water Board resolutions approving the LAMPs. The County of Trinity has not submitted a draft LAMP to the Regional Water Board for approval; therefore, OWTS within Trinity County are regulated under the more prescriptive Tier 1.

Key Issues to Resolve and Considerations: The Counties of Del Norte, Siskiyou, and Trinity have limited staff resources for preparing a LAMP. Additionally, natural disasters in Siskiyou County and staffing changes in Del Norte have delayed engagement on key issues related to LAMP approval. Consequently, completion of LAMPs that can be approved by the Regional Water Board will require significant coordination with Groundwater Permitting Unit staff during the development and review process. Due to limited Groundwater Permitting staff resources and competing priorities, coordination efforts with local agency staff may be delayed.

PY Allocation for FY 2021-22: 0.1

1.f – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: Onboarding the new SB1215 position requires dedicated time to conduct training on internal processes, legal authorities, and roles and responsibilities. For FY 2021-22 approximately 0.1 PY of the SB1215 position will be dedicated to onboarding.

PY Allocation for FY 2021-22: 0.2

2.a – Review Self-Monitoring Reports and Conduct Follow Up

Summary: Regulated facilities prepare and submit self-monitoring reports (SMRs) to document their facility's compliance with waste discharge requirements each month or quarterly in accordance with the facility's monitoring and reporting program. Most facilities also submit an annual report that summarizes the preceding year's monitoring data and compliance status. Groundwater Permitting Unit staff review SMRs to determine compliance with waste discharge requirements. Staff follow up may be required to address missing, unclear information, or other reporting problems. Groundwater Permitting Unit staff has committed to review 50 SMRs in FY 2021-22, focusing on facilities whose compliance history has been inconsistent.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources and competing priorities, the number of SMR reviews has declined in recent years. Consequently, Staff may be unaware of ongoing permit violations. Additional staff resources would improve Unit staff's ability to review SMRs for all regulated facilities and provide timely response to permit violations. To address this deficiency, inform staff of violations and reporting deficiencies, and inform the winery program transition plan, the scientific aid for the unit is focusing on SMR review, tracking and violation enforcement.

PY Allocation for FY 2021-22: 0.1 (Plus 0.2 PY from Sci Aid)

2.b – Respond to State Water Board Program Requests and Participate in Development of Statewide General Permits

Summary: In addition to providing guidance to the nine Regional Water Boards to ensure statewide consistency within the State Water Board’s WDR Program, State Water Board staff often enlists the input of the Regional Water Boards on emerging issues and development of statewide waste discharge requirements. In FY 2020-21, Groundwater Permitting Unit staff will continue engaging in statewide programmatic WDR roundtable meetings and their associated subcommittees (i.e, GeoTracker working group and the SB1215 wastewater consolidation subcommittee) to assess and resolve common regulatory and data management challenges, ensure statewide consistency, address region specific issues, and develop guidance on new and emerging regulations.

Key Issues to Resolve and Considerations: The resource commitment from the Groundwater Permitting Unit for the sanitary sewer systems and aggregate and concrete orders is unknown at this time, but has the potential to divert Groundwater Permitting Staff resources away from other division priorities. Currently Unit staff are not focusing time on implementing the sanitary sewer order due to resource constraints.

Regional Water Board staff engagement with State Water Board personnel during statewide permit development is a valuable investment of time and effort as it increases the clarity of the requirements and improves implementation, which often occurs at the regional level. With a high facility to staff ratio, the challenge is balancing our staff time between statewide coordination and implementing our regional programs. Program staff’s participation in the development of statewide permits may be curtailed if staff are directed to higher priority program tasks within the region.

PY Allocation for FY 2021-22: 0.25 (0.15 PY from WDR staff and 0.1 PY from SB 1215 staff; additional time up to 0.1 PY may be contributed from Unit senior and Division Supervisor, as needed).

2.c – Case Handling, Respond to Complaints, and Emerging Facility Issues

Summary: Groundwater Permitting Unit staff regularly communicate with representatives of regulated facilities regarding permit compliance, response to facility-related complaints, questions about monitoring and reporting requirements, and other discharger concerns. Approximately 600 facilities are assigned to unit staff, which results in hundreds of compliance assistance communications on an annual basis. Unit staff receive compliance assistance inquiries from dischargers, complaints and reports of environmental concerns from the public via direct phone calls, notices from the Governor’s Office of Emergency Services (OES), and reports transferred to staff from CalEPA’s online environmental complaint system. The Regional Water Board receives approximately 10 notices and/or requests for follow up each week. In many cases,

these reports are referred by Unit staff to the appropriate local enforcement agency for follow up or are not responded to because the issue is clearly within the jurisdiction of another agency or the issue is determined by staff to be a minor issue; in other cases, Unit staff may respond to the complaints which often include a site inspection. Groundwater Permitting Unit staff anticipate conducting approximately two complaint inspections in FY 2021-22 (tracked as “other inspections” under performance targets for this program).

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting staff resources and competing priorities, complaint response and facility “case handling” has significantly declined in recent years. Additional staff resources would improve Unit staff’s ability to enroll facilities in general permits, provide timely response to public complaints/concerns, and provide case handling services to regulated facilities. While staff time allocated to these tasks has diminished, spills, discharges, and treatment system failures do occur and staff must take the time necessary to assess these situations and respond accordingly, which may result in the delay of other identified work plan deliverables.

PY Allocation for FY 2021-22: 0.4

2.d – Conduct Facility Inspections and Prepare Compliance Inspection Reports

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provide an opportunity for Regional Water Board staff to provide compliance assistance where needed. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, it is the Groundwater Permitting Unit’s goal to visit each municipal wastewater treatment facility permitted facility every three to four years, or more frequently for facilities with higher Threat to Water Quality/Complexity ratings. Other regulated facilities, such as wineries, campgrounds, and mobile home parks, are inspected on a much less frequent basis. In FY 2021-22, Program staff plan to conduct 16 facility compliance inspections and prepare compliance reports.

Key Issues to Resolve and Considerations: Due to limited Groundwater Permitting Unit staff resources and competing priorities, the number of compliance inspections of regulated facilities conducted by Staff has declined in recent years. Additional staff resources would help increase the number of compliance inspections conducted each year.

PY Allocation for FY 2021-22: 0.2 (Plus 0.05 PY from Sci Aid)

3.a – Unplanned Work Activities (see previous)

PY Allocation for FY 2021-22: Variable

5.3 Performance Targets for FY 2020-21 and Proposed Targets for FY 2021-22

In FY 2020-21, despite the global pandemic and multiple wildfires forcing staff to evacuate from their home, nearly all performance targets for the Groundwater Permitting Unit were achieved. Delays in Regional Water Board approvals of Local Agency Management Programs (LAMPs) for Sonoma County and Siskiyou County stalled the anticipated transfers of oversight of up to 12 OWTS currently regulated by state-issued permits to local oversight, that may be rescinded. The delays were reasonable and mostly due to local agency emergency response efforts and resource constraints. Regional Water Board staff slowed the planned pace of general WDR enrollments from a target of 20 in FY 2019-20 (two completed) to a target of eight in FY 2020-21, and yet staff greatly surpassed that target by completing 40 enrollments including: one under the General WDRs Small Domestic WWTPs; one under the General WDRs for Biosolids; three under the WBFP General WDRs; and 35 under the WBFP General Waiver Targets for compliance and other inspections were narrowly missed due to COVID-19 shelter in place orders that prevented staff from conducting field inspections from March 2020 through June 2021. As a result of the outstanding contributions from the Unit’s scientific aid, the target for self-monitoring report review was greatly exceeded, an effort that is setting the foundation for the Unit’s winery program transition plan.

Performance Targets for FY 2020-21 and Proposed Targets for FY 2021-22

Fiscal Year	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
2020-21 Target	4	8	4	16	3	40
2020-21 Completed	0	40 ⁷	3 ⁸	17	1	300
2021-22 Target	4 to 20 ⁹	12	3	16	2	100

⁷ Includes 33 automatic enrollments for existing dischargers associated with the renewal of the WBFP waiver Order No. R1-2021-0001.

⁸ One of the four WDR performance targets is related to renewal of the waiver of WDRs for WBFP facilities.

⁹ Over a dozen orders may be rescinded if local agency management plans (LAMPs) pursuant to the OWTS Policy are approved by the counties and then by the region.

6.0 SOLID WASTE DISPOSAL PROGRAM

6.1 Core Activities and Projects by Priority

The Solid Waste Program staff has identified the following priorities for FY 2021-2022:

1. *Oversee Sonoma County's Central SWDS landfill expansion.* Region 1 has one active landfill, Sonoma County's Central SWDS, and their capacity has been effectively consumed by recent natural disaster. With only one available program staff, the priority is to oversee and manage the Central SWDS permit. The facility is undergoing rapid expansion planning, design and construction sequencing to provide for immediate capacity needs. The landfill operator, Republic Services, is seeking long term capacity management coordination with Regional Water Board staff.
2. *Adopt Waste Discharge Requirements for the closure of Mendocino County South Coast SWDS and the City of Ukiah SWDS.* For both these facilities, staff will be preparing individual WDRs for the construction of a long-term landfill closure caps, financial assurances for monitoring and maintenance of the cap, and monitoring and reporting requirements for landfill gas, leachate, groundwater, and surface waters.
3. *Continue to coordinate oversight of enrollees under emergency disaster debris orders.* Ongoing coordination with several communities to assess readiness for and provide process for Notice of Intent and Notice of Termination as projects develop in response to emergency solid waste management efforts implementing regulatory measures:
 - a. SWRCB Order No. WQ 2020-0004-DWQ, General Waste Discharge Requirements for Disaster-related Wastes
 - b. Regional Board Order No's. R1-2017-0055 and 56, Conditional Waiver of Waste Discharge Requirements for Disaster-Related Wastes During a State of Emergency within the North Coast Region

The primary responsibilities of program staff are categorized based on priority listed in Table 5. Some are described in detail in Section 6.2.

Table 5 – FY 2021-22 Program Core Activities and Projects by Priority

Priority Level	Activity/Project ¹⁰	Category	Target Deadline
1	a. Prepare Revised WDRs for Central Landfill Solid Waste Disposal Site	Core	June 2022
1	b. Adopt Final Closure WDRs for City of Ukiah Solid Waste Disposal Site	Core	June 2022 ¹¹
1	c. Conduct facility oversight, inspections, case handling, and general order enrollment	Core	Ongoing
1	d. Staff Supervision	Core	Ongoing
2	a. Respond to State Water Board WDR Program requests	Special	Ongoing
2	b. Unplanned Work Activities	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

6.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 5 above.

1.a – Prepare Revised WDRs for the Central Landfill Solid Waste Disposal Site

Summary: The North Coast Region has one active landfill, Sonoma County’s Central SWDS, and their capacity has been effectively consumed by recent natural disaster. With only one available program staff the priority is to oversee and manage the existing Central SWDS Order. The facility is undergoing rapid expansion planning, design and construction sequencing to provide for immediate capacity needs. The landfill operator, Republic Services, is seeking long term capacity management coordination. Land Disposal Staff plan to prepare a revision to the existing order to update requirements, address capacity issues related to fire debris disposal, and account for recent the expansion and changes in operations.

Key Issues to Resolve and Considerations: With a current program vacancy only one program staff is available to prepare revisions for board adoption. Due to limited staff resources, staff often need to balance competing work priorities that may result in

¹⁰ The Land Disposal Program has two funded positions. Each position has an administrative overhead cost, such as leave time, of approximately 0.2 PY per staff (approximately 0.4 PY for two program staff).

¹¹ Dependent on resolution of CEQA litigation. See section 1.b below for more detail.

delays developing or amending WDRs. In some instances, factors beyond staff's control, such as natural disasters, planned power outages, facility treatment and disposal changes, property transactions, funding delays, and litigation can create delays in scheduling board agenda items.

PY Allocation for FY 2021-22: 0.15

Milestones	Target Date
Revise WDRs for Central Landfill SWDS	June 2022

1.b – Adopt Final Closure WDRs for One Solid Waste Disposal Site

Summary: Land Disposal staff plan to prepare a final closure plan for one solid waste disposal sites: The City of Ukiah Solid Waste Disposal Site. In FY 2020-21, Land Disposal staff began reviewing design documents and preparing WDRs for final closure of the Ukiah Solid Waste Disposal Site. The City of Ukiah Coast Solid Waste Disposal Site is no longer receiving municipal solid waste and the existing waste management unit is protected by an interim cover. The City has proposed an engineered alternative cover design (artificial turf) that is relatively new to the North Coast Region. Following adoption of the final Closure WDRs, Regional Water Board staff work includes review of permit deliverables including daily reports prepared in accordance with the approved Construction Quality Assurance (CQA) Plan.

Key Issues to Resolve and Considerations: Adoption of the proposed City of Ukiah Closure WDRs is dependent on the completion of a certified CEQA document. In November 2020, the City of Ukiah released an Environmental Impact Report (EIR) that is being litigated by local environmental groups. As responsible agency under CEQA, the Regional Water Board relies on the certification of the EIR when adopting the WDRs. Regional Water Board acceptance of the CEQA certification and adoption of the Closure WDRs may be delayed due to the current litigation. Additionally, multiple public records act requests for the City of Ukiah SWDS have been received and will require staff, management and legal time to adequately respond due to the large file size and the breadth of the requests.

PY Allocation for FY 2021-22: 0.15

Milestones	Target Date
Preparation and Adoption of City of Ukiah Solid Waste Disposal Site Final Closure WDRs	June 2022 ¹²

¹² Adoption of the proposed Ukiah SWDS Closure WDRs is dependent on the completion of a certified CEQA document.

1.c – Conduct Facility Oversight, Inspections, Case Handling, and General Order Enrollment

Summary: Land Disposal staff conducts routine facility oversight activities over the fiscal year. These activities typically include facility compliance inspections, inspection report preparation, facility work plan review, complaint response, permit enforcement, as well as response to emerging issues at regulated facilities. Land Disposal staff will schedule 10 compliance inspections for FY 2021-22. Other oversight activities are unpredictable and therefore, unscheduled (for example, because of high precipitation, fire impacts, or other natural disasters). In FY 2021-22, Unit staff enrolled four facilities under the applicable WDR for emergencies related to disaster debris disposal. Continued coordination throughout the region on preparation and response to natural disasters is a critical task for unit staff that may result in an immediate change in priorities.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.25

1.d – Review/approval of Work Plan/CQA Plan for Sonoma County Central SWDS

Summary: Land Disposal staff is reviewing design documents and preparing WDRs for construction of new, expanding waste management units at the Sonoma County Central SWDS. Staff received the construction design documents in May 2020 and expect to continue reviewing the necessary documentation in FY 2021-22.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.1

Milestones	Target Date
Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site	Ongoing

1.e – Staff Supervision

Summary: Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to

ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.2

2.a – Respond to State Water Board Program Requests

Summary: In addition to providing guidance to the nine regional water board to ensure statewide consistency within the State Water Board's WDR Program, State Water Board staff often enlists the input of the regional water boards on emerging issues, regulatory updates, and development of statewide waste discharge requirements. In FY 2021-22, Land Disposal Program will participate in a special Investigation currently being undertaken by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve and Considerations: The amount of resource commitment from the Land Disposal Program is for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert additional staff resources away from other division priorities. Program staff's participation in the development of statewide initiatives may be curtailed if staff are directed to higher priority tasks.

PY Allocation for FY 2021-22: 0.05

2.b – Unplanned Work Activities (see previous)

PY Allocation for FY 2021-22: Variable

6.3 Performance Targets

6.3.1 Performance Targets for FY 2021-22

Due to budget constraints the vacant WRCE position in the Solid Waste Program is currently frozen. Of the identified facilities eligible for enrollment in the General WDR for Composting Operations, two are ready for enrollment letters, one was determined to be exempt, and two are pending submittal of corrected information from facility. However, resources constraints have stalled efforts to complete these enrollments. Additionally, unforeseen delays in receiving necessary documents resulted in delays in completing WDRs and their associated MRPs in the last fiscal year. For example, the CEQA document for the Ukiah SWDS is not yet certified, preventing staff from finalizing the permit. Despite these challenges, Unit staff quickly adapted to oversee the completion

of one closure WDR and four enrollments under the general WDRs for disaster debris associate with wildfire impacts.

Table 6 – Performance Targets for the FY 2020-21 and Proposed Targets for FY 2021-22

Fiscal Year	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2020-21 Target	2	5	3	15	16	7
2020-21 Completed	1	4	0	10	8	8
2021-22 Target	1	1	0	8	8	3

7.0 UST/SITE CLEANUP/DoD PROGRAMS

7.1 Core Activities

The primary responsibilities of program staff are categorized based on priority listed in Table 6. Some are described in detail in Section 7.2.

Table 6 – FY 2021-22 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Deadline
1	a. Reviewing and responding to submitted investigation and remediation reports and plans for open cases.	Core	Ongoing
1	b. Prepare and issue directive letters.	Core	Ongoing
1	c. Review all monitoring reports for open cases.	Core	Ongoing
1	d. Prepare enforcement actions.	Core	Ongoing
1	e. Keep all records up to date.	Core	Ongoing
1	f. Manage case work time to match budgeted program hours.	Core	Ongoing
1	g. Staff Supervision	Core	Ongoing

Priority Level	Activity/Project	Category	Target Deadline
2	a. Perform site inspections.	Core	Ongoing
2	b. Review stalled case load and determine next actions to move stalled cases forward (e.g., enforcement, contacting new property owners, etc.)	Core	Ongoing
2	c. Unplanned Work Activities	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

7.2 Core Activity and Project Descriptions

The core activity for the Site Cleanup Unit is overseeing and directing the investigation and remediation of contaminated or potentially contaminated sites under all three cleanup programs – Underground Storage Tank, Site Cleanup, Department of Defense. Sites enter these programs (and become cases) due to recent or historic discharges or suspected discharges of hazardous materials (for example, fuels or solvents) to the surface or subsurface, resulting in groundwater and soil contamination. Sites include industrial facilities, dry cleaners, lumber mills, underground and above ground petroleum storage tanks, accidental spills, and leaks. Each staff person in the Unit is assigned a case load, which can be up to 40-65 cases/sites per staff person.

The core activities are generally the same for each of the three programs. Tasks 1.a, 1.b, 1.c, 1.e, and 2.g are part of regular case management work, in which staff review and respond to reports and plans, send directive letters, manage records, and perform site inspections. Sometimes for a case, staff prepare and issue enforcement actions (task 1.d).

Some cases in each program are stalled, and the responsible parties are conducting very little or no work on the site. Cleanup staff review these to determine the reason for the stall and take various actions to move the case forward again. The State Water Board has a stalled case program and contractor (Red Horse) that assists the Unit with stalled cases. Enforcement is an additional tool for managing stalled cases, but sometimes the properties have changed hands or responsible parties are no longer available and staff must investigate all potentially new responsible parties and involve them in the project. Also, if the responsible parties have insufficient funds to do the needed work but are willing, Unit staff helps the responsible parties investigate funding possibilities.

Each staff person's time is allocated between two or three of the programs. Staff must manage their work time to work the assigned time within each program, due to different funding sources for each.

The Region's UST/Site Cleanup/DoD Program staff are supervised by a Senior Engineering Geologist, who is allocated **1.0 PY**.

Case Work Prioritization

Below is a list of considerations used in prioritizing cleanup cases:

1. Impacts to water supply wells, human health risks including indoor air contamination, direct contact with contamination, or discharge of contaminants to surface water, including consideration of whether or not such impacts are being managed (meaning stopped through interim measures like well head treatment or sub-slab depressurization)
2. Threatened impacts to the above that will likely occur without active remediation
3. Potential impacts to the above not defined
4. High likelihood of future beneficial use of groundwater
5. Redevelopment
6. Cooperation or recalcitrance of responsible parties; funding availability
7. Public interest
8. Achieving case closure
9. Others

Program and Additional Tasks Descriptions

Underground Storage Tank (UST) Cleanup Program

Summary: The UST program is for cleanup work related to current and prior petroleum underground storage tank system releases. Due to U.S. EPA rules requiring the installation of upgraded UST systems in the 1990s, most active USTs were replaced then. When old USTs were removed from the ground, contamination was frequently detected which led to our agency opening UST cleanup cases for those sites. With the upgraded systems, there are now only a few new UST cases per year, and the cases remaining open are mostly those that have significant impediments (e.g., particularly severe and/or complicated contamination impacts, recalcitrant responsible parties, and/or lack of funding).

The Site Cleanup Unit currently has 151 open UST cases.

Key Issues to Resolve and Considerations: The UST Cleanup Fund (Fund), established by SB 299 in 1989, requires owners of petroleum underground storage tanks (USTs) to pay a per gallon fee to the Fund. This Fund helps owners and operators pay for costs associated with contaminated soil and groundwater from leaking USTs. The Fund also pays for 4.5 PY units in the Cleanups Unit for oversight of UST sites. The Fund is set to sunset in 2025 and it is not known yet if it will be extended by the State legislature and, if so, to what extent. Changes to this funding source may affect how

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quickly UST sites are investigated and cleaned up and how staff regulates Cleanups cases. This could make it more difficult to get a site cleaned up without the use of enforcement tools and/or grant funding. Information on the possible extension of the UST Cleanup Fund is not known at this time.

PY Allocation for FY 2021-22: 4.5 within the unit.

Site Cleanup Program

Summary: The Site Cleanup Program is for all other hazardous material release cleanup work not covered by the UST cleanup program and DoD cleanup program. Many of these cases involve chlorinated solvent discharges from dry cleaning operations, petroleum discharges from aboveground storage tank petroleum sites, and a variety of discharges from industrial sites, including metals, wood treatment chemicals, waste oil, as well as fuels and solvents. Some of the sites have proposed redevelopment work that must be considered in the cleanup work. SCP cases also include hazardous materials spills that require significant response time and on-going work for Unit staff.

Many of the sites are enrolled in the State Board's Site Cleanup Cost Recovery Program, in which the responsible parties are billed for staff time. Region 1 is assigned 2.0 PY in direct billable time under this program. Thus, staff track specific case work in a separate database for billing purposes and must also keep within budgeted time.

Program staff also use personnel time from the State Board's Site Cleanup Subaccount to work on non-cost recovery cases as well as work on cases using grant money from the Site Cleanup Subaccount.

The Site Cleanup Unit currently has 148 open SCP cases.

Key Issues to Resolve and Considerations: The Site Cleanup Program includes releases from sources other than USTs, such dry cleaners, lumber mills, above-ground storage tanks and spills. The chemicals of concern are often solvents, inorganics or other hazardous materials. The responsible parties (RPs) pay for the investigation and cleanup themselves and also pay for Regional Water Board oversight through the cost recovery program. When RPs cannot pay for the cleanup work, the options are for the Regional Water Board to take enforcement actions to compel the RP to undertake cleanup activities or for the RP to apply for and secure grants to fund the cleanup. In order to qualify for most grants, the RP must show that they do not have the financial resources to pay. The State Water Board is exploring options to improve the availability of public funding to pay for these cleanups but to date there is not enough funding for them all, leaving enforcement or property redevelopment as the primary options to compel the work. Lack of funding results in many SCP sites remaining open, yet inactive.

PY Allocation for FY 2021-22: 3.4

7.3 Department of Defense (DoD) Cleanup Program

Summary: The DoD cleanup program has a separate funding mechanism and separate state-federal agreements for cleanup work on current or former DoD sites. The types of contamination and releases are mostly the same as the other programs, as military sites could have had any number of operations that occur elsewhere (e.g., fueling, solvent work, shooting ranges).

All DoD cleanup program sites in Region 1 are formerly used defense sites (FUDS) and are no longer active military facilities. There are 47 open FUDS cases (active and inactive), and 14 of which are open active military UST sites, though many of the former facilities have multiple sub-sites. Two of the largest, the former Naval Auxiliary Air Station in the middle of Santa Rosa and the former Arcata Naval Auxiliary Air Station (the current Airport outside Arcata), have active investigation and remediation work.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2021-22: 0.1

Spill response

Summary: The site cleanup unit responds to hazardous material spill reports for petroleum and chemical spills occurring within Region 1. Any spill that will involve significant cleanup work overseen by Cleanup staff become cases and are thus covered under task 1.b. Other spill reports are also received that require Cleanup staff attention, often at the request of local agencies overseeing the immediate spill response, but only require interagency consultation and a site inspection. When significant oversight time is not anticipated, these responses do not become cases, and are covered with SCP program overhead funding.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2021-22: 0.1

Respond to public inquiries on closed cases or non-case property evaluations.

Summary: Site Cleanup Program staff receives multiple public inquiries each week involving closed cases or properties that are not currently cases but are being evaluated for potential contamination from former operations. These inquiries often arise out of redevelopment, potential property transfers, or refinancing, and may be part of a Phase I Environmental Site Assessment for the property. As many of these inquiries are time sensitive and may depend on information or responses that only our agency can provide, responding to the inquiries and providing relevant records is considered a high priority.

In addition, staff receives Phase II Environmental Site Assessments, involving actual soil and groundwater sampling, not under our oversight, at a property to investigate potential contamination. While some of these documents report releases that will necessitate staff oversight and direction as new UST or SCP cases, many of these documents report investigation findings that do not warrant oversight by Cleanup staff. Receiving the feedback from our agency that we would not require further work can be important to redevelopment. Thus, staff endeavors to provide such evaluations and responses in a timely manner.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.1

7.4 Performance Targets

The general goal with the cases is to define the extent of contamination, remediate the contamination as necessary, verify remediation effectiveness through additional testing and monitoring, and institute any necessary engineering or institutional controls to prevent future exposures. A site is moved into the “Active Remediation” category once remediation work is proposed, approved and conducted on the site so that the quantity of contaminants in the soil, groundwater or soil vapor are removed or their concentrations reduced to acceptable levels. Upon successful completion of this process, the case is moved into the “Closed” category. Sometimes a site can be moved into the “Closed” category without undergoing active remediation if it is determined by Regional Water Board staff that the site and remaining contamination does not pose a threat to water resources or public health. This ties into the ORPP tracked goals for the programs: number of new cases moved into remediation and number of cases closed.

7.4.1 Reported to State Board via ORPP

Performance Targets for FY 2020-21 and Proposed Targets for FY 2021-22

FY 2020-21 Performance Targets	Target	Reported
# of DoD Sites New into Active Remediation	0	0
# of SCP Sites New into Active Remediation	2	2
# of SCP Sites Projected Closed	4	3
# of UST Sites New into Active Remediation	3	2
# of UST Sites Projected Closed	10	26

FY 2021-22 Performance Targets	Target
# of DoD Sites New into Active Remediation	0
# of SCP Sites New into Active Remediation	2
# of SCP Sites Projected Closed	4
# of UST Sites New into Active Remediation	3
# of UST Sites Projected Closed	10

Although not included on the table above, 10 DoD sites in Region 1 were closed during the FY 2020-21 reporting period. These site closures are not reflected in the performance targets because DoD sites are broken down into Areas of Concern (AOC) and there can often be multiple AOCs located on one DoD site. Staff has targeted zero DoD sites into remediation because it would be very unusual and unlikely for all of the AOCs in a DoD site to enter into remediation at the same time, and since much of this contamination happened decades ago many AOCs within a single DoD site have already been remediated or might not ever need to.

Cleanups staff far exceeded the FY 2020-21 target of 10 for number of UST sites closed, with 26 UST sites closed. This overperformance occurred because new staff were able to take over cases and process closures from positions which had been vacant for almost one year or more due to the pandemic. Ten closed sites have been selected as the FY 2021-22 target because the remaining sites are typically much more complex and impacted which requires more time and resources to get to case closure than the sites closed in previous fiscal year.

8.0 GROUNDWATER PROTECTION PROGRAM

8.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 7.

Table 7 – Groundwater Protection Program

Priority Level	Activity/Project ¹³	Category	Target Deadline
1	a. Develop a Groundwater Protection Policy Statement for Regional Water Board Consideration	Core	August 2022
1	b. Provide technical support to Regional Board staff	Core	On-going
1	c. Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team	Special	On-going

¹³ The Groundwater Protection Program has one funding position but utilizes other Division staff and members of the Groundwater Team on an as needed basis to fulfill its mission.

2	a. Participate in Implementation and Development of Statewide General Orders and Initiatives	Special	On-going
2	b. Support the development and implementation of groundwater monitoring programs in priority groundwater basins	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

8.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 7 above.

1.a – Develop the Groundwater Protection Policy Statement

Summary: *The Groundwater Protection Program* is intended to develop a *Policy Statement for Groundwater Protection* describing a programmatic approach to groundwater quality protection. The Regional Water Board provided direction to staff on developing the policy statement at the April 15, 2021 Board Meeting. Planning and technical work to develop the policy statement is expected to be completed by August 2022.

Key Issues to Resolve and Considerations: The Regional Water Board will periodically provide direction to staff as the Policy Statement is developed.

PY Allocation for FY 2020-21: 0.3 (Senior Specialist) and various PY fractions (not accounted for here) from Groundwater Team members in other Regional Water Board programs.

Milestones	Target Date
Policy Statement	August 2022

1.b – Provide Technical Assistance to Regional Water Board Staff

Summary: A high priority of the Groundwater Strategic Team is to provide support for improving groundwater protection efforts through our regulatory programs by establishing baseline conditions for Regional Water Board staff to consider when developing permits and cleanup and abatement orders, antidegradation analysis, and monitoring and reporting programs. As the Division’s technical expert and on an as needed basis, the Groundwater Specialist provides technical review of technical plans/reports and NPDES/WDR permits.

In FY 2021-22, it is anticipated that the Groundwater Specialist will provide data analysis and recommendations for groundwater protection measures at various municipal and industrial facilities currently regulated under NPDES and WDR permits including recycled water, quarries, landfills, mines, and dredge spoils projects.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2 (Senior Specialist) and various PY fractions from team members.

1.c – Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team

Summary: A key task for the Groundwater Specialist is to develop and strengthen external partnerships to realize the Regional Water Board’s vision and the core goals of the Groundwater Strategic Team including: 1) Development of a groundwater protection policy statement; 2) Continued basin evaluation and prioritization for salt and nutrient management planning; and 3) inventory and strengthen groundwater protections within statewide, regional and individual WDRs where needed to protect groundwater resources including shallow groundwater for domestic and municipal, agricultural, and industrial supply. As opportunities arise, the staff will reach out to establish and foster relationships with partner agencies such as:

- California Department of Fish and Wildlife
- Department of Water Resources
- Local water and wastewater managers
- Local stakeholders including businesses and non-profits
- University of California
- U.S. Geological Survey
- State Water Board and Regional Water Boards

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.1 Senior Specialist

2.a – Participate in Implementation and Development of Statewide Initiatives

Summary: State Water Board staff often enlists the input of the regional water boards on emerging issues and implementation/development of statewide initiatives. In FY 2021-22, the Groundwater Team, led by the Groundwater Specialist, will continue assisting State Water Board staff. Key projects include:

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- **Constituents of Emerging Concern (CEC) Initiative.** The Water Boards have worked on several projects to monitor for Constituents of Emerging Concern (CECs) and to identify the CECs that are of the highest risk to human health and the environment. The long-term objective of the CEC initiative is to develop a statewide strategy to monitor and control CECs. Participation in this effort is necessary to:
 - Make initial steps towards development of a statewide management strategy for CECs.
 - Improve coordination within the Water Boards on CEC-related issues.
 - Make CEC vocabulary and definitions of terms consistent.
 - Reduce frequency of duplicative CEC efforts.
 - Make a transparent communication effort.
 - Assess the status of State & Regional Water Boards and Division of Drinking Water CEC efforts and then build mechanisms to coordinate these ongoing efforts.
 - Evaluate regional monitoring efforts and pilots project to assess novel approaches to monitoring and future monitoring priorities.
 - Evaluate monitoring results to assess potential impacts to beneficial uses and integrate appropriate monitoring into our regulatory programs.

- **Groundwater Sustainability Plans (GSPs).** State Water Board staff are seeking input from Regional Water Board staff on reviewing various components of the seven GSPs to be submitted during FY 2021-22 (Smith River Plain, Butte Valley, Scott Valley, Shasta Valley, Ukiah Valley, Tulelake, and the Santa Rosa Plain). Groundwater Sustainability Agencies are charged with preparing and implementing GSPs to sustainably manage groundwater within certain groundwater basins. Staff have identified several components of GSPs which consider water quality, including:
 - Existing water quality conditions
 - Sources of groundwater contamination
 - Monitoring networks
 - Sustainability indicators for water quality degradation and surface water depletion.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2020-21: 0.2 Senior Specialist

2.b – Support the development and/or implementation of groundwater monitoring programs (onetime and ongoing) in priority groundwater basins

Summary: Staff recently completed the evaluation and prioritization of the 63 North Coast groundwater basins. In many groundwater basins, the quality of groundwater used in disadvantaged communities served by domestic wells and onsite wastewater

treatment systems was identified as a data gap. Staff are working to identify potential funding sources and stakeholder groups to support groundwater monitoring programs which will inform projects and management actions to protect/restore groundwater quality and human health. The Senior Specialist provides expertise and recommendations to develop project descriptions and identify data gaps. In FY 2021-22, the Senior Specialist anticipates supporting groundwater monitoring programs in the following areas:

Santa Rosa Plain – Salt and Nutrient Management Plan
Scott Valley – Groundwater Sustainability Plan
Shasta Valley – Groundwater Sustainability Plan
Dairy Program – Monitoring and Reporting Program
Smith River Plain – Water Quality Monitoring Plan
Several Disadvantaged Communities – Local Agency Management Plans

Key Issues to Resolve and Considerations: Staff resources for this program in FY 2021-22 are limited to the Groundwater Specialist, an unpaid intern, and other division staff, and members of the Groundwater Strategic Team, as needed and re-directed by Executive Management.

PY Allocation for FY 2020-21: 0.05 Senior Specialist

8.3 Performance Targets

8.3.1 Reported to State Board via ORPP

No performance targets have been identified by ORPP for Groundwater Protection Program efforts to date.

9.0 IRRIGATED LAND REGULATORY PROGRAM

9.1 Core Activities and Projects by Priority

The primary responsibilities of Irrigated Lands Regulatory Program staff are categorized based on priorities listed in Table 8. Some are described in detail in Section 9.2. The cornerstone to the Irrigated Lands Regulatory Program (IRLP) is the development of agricultural lands permits. The North Coast Region has one and a quarter PY dedicated to this program for permit development and watershed stewardship. For FY 2021-22, the Groundwater Permitting Unit is developing a vineyard permit and finalizing and implementing the Smith River Plain Water Quality Management Plan (SRPWQMP). The

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Agricultural Lands Discharge Program staff has identified the following priorities for FY 2021-2022:

1. *Develop the administrative draft WDRs for Vineyard Operations in the North Coast Region and release a public review draft by the end of 2021.* Region 1 has been developing a draft WDR to regulate vineyards over five acres in size. Key issues that need internal consensus include scope and coverage, riparian area management, and water quality monitoring and reporting requirements. Staff continues with stakeholder outreach with representatives from the vineyard industry, environmental groups, and will be focusing on environmental justice and tribal outreach during the upcoming CEQA scoping meetings. Staff is currently refining compliance requirements to enable evaluating potential environmental impacts of the WDRs pursuant to CEQA.
2. *Finalize the draft Smith River Plain Water Quality Management Plan (SRPWQMP).* Staff has been working under the technical guidance of the Watershed Stewardship Coordinator to establish a watershed stewardship framework that will address water quality problems associated with lily bulb cultivation in the Smith River Plain. The SRPWQMP includes the implementation of management practices to reduce the delivery of copper and pesticides in runoff to surface waters, water quality sampling to track changes in water quality. Once approved by the Executive Officer, elements of the Plan will be used to develop General Waste Discharge Requirements (WDRs) associated with lily bulb cultivation in the Smith River Plain and fully implement in the State's Nonpoint Source Policy.

Table 8 – FY 2021-22 Program Core Activities and Projects by Priority

Priority Level	Activity/Project ¹⁴	Category	Target Deadline
1	a. Prepare administrative draft of Vineyard Permit	Core	August 2021
1	b. Prepare public review draft of Vineyard Permit and CEQA Documents	Core	July 2022
1	c. Complete Smith River Plain Water Quality Management Plan (SRPWQMP)	Core	December 2021
1	d. Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the SRPWQMP	Special	On-going

Priority Level	Activity/Project ¹⁴	Category	Target Deadline
1	e. Staff Supervision	Core	On-going
2	a. Attend statewide Irrigated Lands Regulatory Program (ILRP) roundtable meetings and provide bi-monthly reports to the State Water Resources Control Board. Respond to State Water Board ILRP Program requests	Core	On-going

Categories: Categories are marked as either **Core** or **Special**

9.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 8 above.

1.a – Prepare Administrative Draft for New Agricultural Lands Vineyard Permit

Summary: Staff will continue work begun in FY 2019-20 to develop the administrative draft permit for the Agricultural Lands Vineyard Permit. The administrative draft will include enrollment tiers relative to water quality risk, prohibitions, specifications, provisions, findings, as well as a monitoring and reporting plan and third-party requirements.

Preparation of Vineyard WDR. Development of the administrative draft of the vineyard permit will continue and is scheduled to be completed in August 2021. Final CEQA documents are expected to be completed in July 2022 concurrent with the completion of the public review draft of the permit. Key issues to resolve in the permit development process include vineyard size enrollment requirements and tier structures, farm plan requirements, sediment and erosion control requirements, riparian area management and stream buffer requirements, monitoring and reporting requirements, third-party compliance assistance programs, and compliance with non-point source plans and policies including the precedential State Water Board's East San Joaquin Order.

Preparation of CEQA documents. Staff will develop an initial study and mitigated negative declaration or EIR, as well as economic considerations to document the anticipated environmental impacts and the cost of compliance measures related to permit implementation. As per the findings of the initial study, staff shall either proceed with the preparation of a mitigated negative declaration or an EIR. If an EIR is required for this permit, the permit adoption schedule may be adjusted to provide additional time, if needed. Based on proposed elements of the permit, an EIR will be conducted as significant potential impacts are foreseen. Needing to complete an EIR will affect the

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schedule and require more time as compared to the original schedule that included completion of an initial study only. The initial study as well as the EIR will be completed by staff upon completion of the administrative draft of the permit and prior to preparation of the public review draft of the permit.

Public Participation. The vineyard permit will apply to vineyards throughout the Region. To receive critical feedback from stakeholders during permit development, staff will hold a series of focused group meetings throughout the North Coast Region and public workshops in Sonoma and Mendocino Counties. This stakeholder work is planned to continue through the permit development process. Based on stakeholder feedback received, staff will continue development of an administrative draft of the permit.

Development of Implementation Work Plan. A GIS database with relevant geo-spatial information will be used to monitor and track permit enrollment and reporting. This database will allow staff to efficiently and effectively facilitate the expected enrollment of a large number of vineyard operations; conduct third-party oversight to ensure completion of Water Quality Farm Plans, monitoring and reporting; as well as oversee outreach and education efforts, all of which will be included in permit implementation. Implementation is scheduled to begin after Board adoption of the permit in FY 2022-23.

Key Issues to Resolve and Considerations: In the event that COVID-19 restrictions are retained during FY 2021-22, during the planned stakeholder and public engagement period, the timing of the preparation of CEQA documents and the administrative draft permit may be affected.

PY Allocation for FY 2021-22: 0.3

Key Milestones	Target Date
Continue focused stakeholder group outreach	Ongoing
Develop implementation work plan for Vineyard Permit	Ongoing
Prepare administrative draft of Vineyard Permit	August 2021
Host public workshops and focused stakeholder group meetings on administrative draft Permit	November 2021 – April 2022
Develop CEQA documents for Vineyard Permit	July 2022

1.b – Prepare Public Review Draft for New Agricultural Lands Vineyard Permit

Summary: In the second half of FY 2021-22, staff will revise the administrative draft permit and corresponding CEQA documents based on stakeholder input and prepare the public review draft of the permit. Revisions to the administrative draft permit may require additional stakeholder outreach. Board adoption of the vineyard permit is planned for late 2022.

Key Issues to Resolve and Considerations: COVID-19 restrictions and natural disasters affecting stakeholder and public engagement.

PY Allocation for FY 2021-22: 0.3

1.c – Complete Smith River Plain Water Quality Management Plan

Summary: The Regional Water Board, with input from lily bulb growers, resource agencies, the Tolowa Dee-ni' Nation, and other stakeholders are developing a coordinated approach to control waste discharges from lily bulb agricultural operations under the SRPWQMP. With the completion of the public review process Regional Water Board staff will continue stakeholder engagement, consider input from the Watershed Stewardship Team, and revise the SRPWQMP as appropriate. The Regional Water Board's Executive Officer will then consider approval of the Plan.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2021-22: 0.10

Milestones	Target Date
Finalize SRPWQMP and EO approval	December 2021

1.d – Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the SRPWQMP

Summary: The SRPWQMP includes an adaptive management program, a schedule for soliciting input on the effectiveness of the program, and a process for making revisions. As the Plan is implemented, the working group will consider the following information at the annual workgroup meeting to be held in November 2021:

1. Grower annual reporting forms documenting:
 - Streamside protection area widths, including any filter strips
 - Field specific management practice implementation
 - Operation wide management practice implementation
2. Regional Water Board surface water sampling program. As part of the SRPWQMP, the Regional Water Board, in coordination with partners, will sample the tributaries in the Smith River Plain that receive stormwater runoff from lily bulb fields. The purpose of sampling is to track the status of water quality and water quality trends in the coastal tributaries to assess the effectiveness of water quality practices implemented on lily bulb operations. The goal is to conduct up to three sampling events per year: two during storm events, and one during the baseline flow period. The monitoring results will inform the adaptive management strategy and any needed revisions to the Plan.
3. Regional Water Board inspection reports. Staff plan to conduct inspections of lily bulb operations to determine adherence to Plan implementation measures, and request follow up measures to address water quality protection needs, as necessary. For FY 2021-22, staff plan to conduct at least one inspection for each lily bulb operation.
4. Adaptive management of the program will be based on information from the previous year's complete growing season. To the extent practicable, Regional Water Board staff will be available to assist growers in filling out their annual reporting forms. The Watershed Stewardship Team will gather stakeholder input, review all data and reporting information, and make recommendations concerning water quality practices to be implemented on lily bulb fields for the 2022–2023 growing season
5. Development of the Biotic Ligand Model and Adaptive Management Thresholds. One of the primary goals of the SRPWQMP is to control the impacts of dissolved copper in stormwater runoff on water quality. To guide this effort, staff will develop adaptive management thresholds for dissolved copper specific to the Smith River Plain. The complexities of copper speciation in the water column and the implications for assessing bioavailability complicates the development of appropriate threshold concentrations. To properly account for these factors, staff plan to make use of a predictive model called the Biotic Ligand Model (BLM). As

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part of the Adaptive Management Monitoring Program established in the SRPWQMP, surface water sampling analytes include the input parameters necessary to run the BLM. It will require at least two years of sampling to establish a range of typical values for these variables and long-term thresholds that properly account for seasonal and geographic variations.

Key Issues to Resolve and Considerations: While the long-term thresholds are being determined, the BLM will be used to evaluate the risk of copper toxicity associated with the copper concentrations measured in a single sample by running the concentrations of the associated input parameters values through the model. The dissolved copper concentration in the water column is then compared to the toxicity threshold determined by the BLM. This interim approach will be used while the monitoring program collects enough data to establish long-term thresholds as described above.

PY Allocation for FY 2021-22: 0.10

Milestones	Target Date
Develop adaptive management program recommendations with the Watershed Stewardship Team	March 2022
Conduct three sampling events in the Smith River Plain	June 2022
Conduct four inspections of lily bulb operations	June 2022
Run Biotic Ligand Model to compare to historical sample results for dissolved copper	June 2022

1.e – Staff Supervision

Summary: Development of the regional vineyard permit is the number one priority of the Executive Officer for the Groundwater Permitting Unit. Additionally, the vineyard permit is part of the North Coast Region’s non-point source program implementation work plan and a priority for addressing watershed impairments for sediment, temperature, and nutrients. Ongoing stakeholder engagement, permit requirement development, and environmental impact analysis are the three tasks where staff, senior specialists, and executive management are actively contributing.

Supervision of the technical staff is a critical function of the unit senior. The unit senior supervises, plans, organizes, and directs the work of technical staff under their direction. Supervisory tasks include preparing individual work plans and performance evaluations; providing day-to-day guidance of technical staff to ensure they are appropriately trained, timely completing work, and implementing a shared set of agency expectations; providing first-level review and approval of written documents to ensure proper content, consistency, completeness, and accuracy; participating in meetings with stakeholders; and preparing items for Board action.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2021-22: 0.3

2.a – Statewide Irrigated Lands Program and Reporting

Summary: Groundwater Permitting Unit staff will attend statewide Irrigated Lands Regulatory Program (ILRP) roundtable meetings and provide bi-monthly reports to the State Water Resources Control Board. Staff will also stay up to date on statewide policies related to agricultural regulatory programs, funding opportunities, technical assistance for growers, and statewide precedential program elements applicable to agricultural permitting.

Key Issues to Resolve and Considerations: None.

PY Allocation for FY 2021-22: 0.1