Fiscal Year (FY) 2022-2023 WORK PLAN

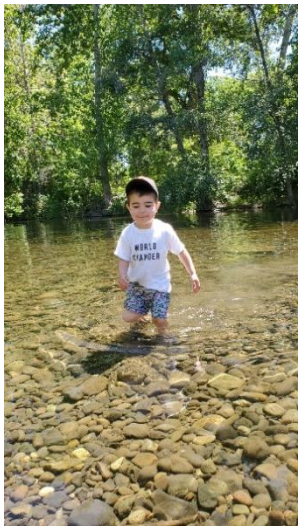
Point Source Control & Groundwater Protection Division

Programs:

NPDES Wastewater
NPDES Stormwater
Waste Discharge to Land
Solid Waste Disposal
Underground Storage Tank Cleanup/Site Cleanup/DoD Cleanup
Groundwater Protection
Irrigated Lands

Division Supervisor: Charles Reed





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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 (1 MGD) 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 thirty-eight (38) 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
26	7	0	5

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 53 facilities regulated under general NPDES permits in the North Coast Region.

General NPDES Permit[1]	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 for Cold Water Concentrated Aquatic Animal Production Facilities	R1-2021-0010	4
General Order Pesticide Aquatic Invasive Species	2011-0003-DWQ	3
General Order Pesticide Spray Application	2011-0004-DWQ	0
General Order Pesticide Vector Control	2016-0039-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 in leu of more robust implementation. For the NPDES Wastewater Program, the program components for which tasks have been scaled back in FY 2022-2023 until additional resources are available include: permit development and renewal, implementation of the federal pretreatment program, 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 sources: municipal separate storm sewer systems (MS4s), construction activities, and

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

industrial activities.

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	267
Industrial Storm Water Permit	515

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. Development of the draft permit is underway and the remainder of the work on the Phase I permit will be conducted during FY 2022-2023. Regional Water Board consideration of the proposed Phase 1 for adoption is expected in FY 2022-2023.

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, and 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 FY 2022-2023. 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 considered by the State Water Board for adoption in 2022-2023.

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.

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 in lieu of a more robust implementation. For the Municipal Stormwater Program, the activities for which staff resources are not allocate include:

- Additional inspection and program audits beyond performance targets
- Robust document review and timely response
- Increased coordination with nonpoint source and 401 Certification, planning, and groundwater program staff for projects and facilities with permits issued under multiple programs (e.g., a construction project in a regulated MS4 area where the Regional Water Board has issued coverage under the Construction Stormwater General Permit and for which a 401 Water Quality Certification has also been issued)
- Development of deeper subject matter expertise in areas such as Low Impact Development design, municipal operations, sampling and monitoring
- Robust implementation of statewide general permits such as Utility Vault, Pesticide, and Low Threat permits, 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 267 active sites enrolled under the Construction Stormwater General Permit. Regional Water Board construction stormwater staff oversees permit compliance in the North Coast region and is participating with State Water Board staff to develop and

reissue a new Construction Stormwater Permit. Region 1 has one staff position allocated to implementation of the Construction Stormwater Program. This position is currently vacant but expected to be filled by early FY 2022-2023.

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 in lieu of a more robust implementation. For the Construction Stormwater Program, the activities for which staff resources are not allocated include:

- Additional inspections above the program performance targets
- Robust review of discharger-submitted documents such as annual reports, SWPPPs, and monitoring reports
- Increased data evaluation to identify trends for issues such as, common issues at sites, contractors or QSPs that struggle to maintain compliance, watersheds, cities or counties that have non-compliant sites, and the identification of training needs within the regulated community
- Increased compliance support and training for the regulated community as well as for our city and county inspectors
- Improved coordination with statewide efforts related to permit implementation and renewal
- Increased coordination on enforcement efforts
- Improved coordination with Cannabis and Irrigated Agriculture programs
- 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. Region 1 has one staff position allocated to implementation of the Industrial Stormwater Program. Regional Water Board industrial stormwater staff oversees permit compliance in the North Coast region and is participating with State Water Board staff to develop and reissue a new Industrial Stormwater Permit.

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 in lieu of a more robust implementation. For the Industrial Stormwater Program these activities for which staff resources are not allocated include:

- Additional inspections of regulated facilities beyond the program performance targets
- Robust review of documents such as annual reports, SWPPPs, routine monitoring reports, and other documents and permit-related notices submitted by dischargers
- Increased data evaluation to identify trends for issues such as, common issues at facilities, identification of additional sectors and/or pollutants of concern, watersheds, cities or counties that have non-compliant sites, and the identification of training needs within the regulated community
- Increased compliance support and training
- Improved coordination with statewide efforts related to permit implementation and renewal
- Increased coordination on enforcement efforts
- Improved coordination with other regulatory programs
- Evaluation of stormwater pollutants monitored for
- Evaluation of the need to regulate additional sectors
- Evaluation of the need for facility specific requirements
- Internal processes improvement efforts.

1.3 Waste Discharge to Land Program

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 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 of WDRs 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.

WDRs are issued for the duration of the discharge and do not contain an expiration date. Regional Boards are authorized to review WDRs periodically pursuant to Section 13263(e) of the Porter-Cologne Water Quality Control Act. The State Legislature has found that many WDRs are out of date and therefore do not implement State laws, regulations, and revised Water Quality Control Plans and Policies that have been enacted since the WDRs were adopted.

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 wastewater treatment plants (73)
- Sawmills (2)
- Projects involving the land application of biosolids and ash (4)

Currently, there are 119 individual WDRs active in the North Coast Region Waste Discharge to Land Program. The guidelines of the administrative procedures require that WDRs be reviewed on a frequency of three, five, or ten years based on the discharger's Threat to Water Quality (TTWQ). TTWQ is defined in Chapter 2 of the Water Quality Administrative Procedures Manual (APM). WDR Program managers and the State Water Board have revised these timeframes through the statewide roundtable and amended the WDRs review and update timeframes to five, ten, and 15 years. WDRs that have not been reviewed/updated according to the required frequency are backlogged.

The current backlog for Region 1 is listed below by age of Orders.

- >40 years old – Five (5) Orders
- >30 years old – 39 Orders
- >20 years old – 44 Orders
- >10 years old – 14 Orders
- >5 years old – Five (5) Orders
- 0-4 years old – 12 Orders

Staff's approach to addressing this backlog is described in Section 5.1.

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 wastes
- Facilities that require the same effluent limitations or operating conditions
- 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 Transportation Structure Repainting
- General Permit for Drinking Water Systems Discharges
- General Permit for Winery Process Water (new)

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 is planned for renewal by the Regional Water Board during FY 2022-2023.

General Permit for Winery Process Water

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.

Wineries in Region 1 are currently regulated under individual, winery-specific WDRs,

General WDRs Order No. R1-2002-0012 for winery waste to land (inactive), General WDRs Order No. R1-2016-0002 for wine, beverage and food processors, Conditional Waiver of WDRs Order No. R1-2021-0001 (expires February 4, 2026), or are unregulated. Consistent with the State Water Board's objective to enroll all eligible wineries under the new statewide General Winery Order by 2026, Regional Water Board staff has developed a phased plan to transition eligible wineries from their current permit coverage and eligible unregulated wineries to coverage under the statewide General Order, which is detailed in section 5.1 item 3 below. The plan prioritizes General Order enrollment of unregulated wineries and currently regulated wineries that have requested enrollment under the statewide General Order. Other wineries eligible for General Order enrollment but currently regulated under existing regional permits or waivers will be enrolled as staff resources allow.

Assistance to Disadvantaged Communities (DACs) and Advancing the Human Right to Water

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 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, public health improvement and advance the Human Right to Water throughout the North Coast Region[2]. Regional Water Board staff are encouraged, as resources allow, to meaningfully engage with communities that lack adequate, affordable, or safe drinking water, including providing community outreach, technical assistance, and financial resources, as part of the Water Boards' administration of programs or project funding pertinent to the human right to water. Staff will promote achievement of the human right to water including the right to sanitation and hygiene facilities through effective prioritization, implementation, outreach and participation, and partnership.

More information on this subject and links to regionwide analysis on DACs can be found on the Environmental Justice webpage at Environmental Justice | California North Coast Regional Water Quality Control Board.

Wastewater Consolidation Program for DACs

The statewide Wastewater Consolidation Program, established under Senate Bill 1215

[2] Resolution No. R1-2019-0024 Adopting the Human Right to Water as a Core Value and Directing its Implementation in the North Coast Regional Water Board Actives and Authorizing the Executive Officer to Enter into Memorandum of Mutual Understanding with the North Coast Resource Partnership

(SB 1215), which in 2018 modified the Porter-Cologne Water Quality Control Act (Chapter 4.3, commencing with Section 13288) authorizes Regional Water Boards to encourage, and if necessary, mandate the provision of sewer service to disadvantaged communities with inadequate onsite sewage treatment systems. SB 1215 allocated one WRCE position to Region 1 to implement this new law within the region. This position was filled in FY 2021-2022 and the incumbent is actively coordinating with the sewer consolidation working group, a multi-region team developing the consolidation guidelines. In addition to commencing with implementation of the new SB1215 (wastewater consolidation) regulations, staff are commencing with early implementation of the Russian River Watershed Pathogen TMDL Action Plan by assisting with the development of wastewater disposal projects.

In FY 2022-2023, program staff will develop and begin to implement a strategy to identify specific environmental infrastructure needs of DACs, Tribes, and other distressed communities facing a financial hardship in the North Coast Region. The primary goals of the regionwide Needs Assessment are to identify the capital infrastructure needs of the North Coast and define a pathway for the timely planning and construction of projects that enhance beneficial uses, improve water quality and advance the Human Right to Water. Staff is drafting a workplan for this assessment and will begin workplan implementation in FY 2022-2023. The Region 1 Needs Assessment strategy will complement a parallel statewide effort currently being undertaken by the State Water Board.

1.3.2 Unallocated Program Activities

Due to limited staff resources, certain subprograms that fall within the purview of the Waste Discharge to Land Program are not prioritized and allocated staff time for the coming fiscal year including, septage disposal projects and existing permits, active mines regulated under WDRs, and abandoned and unregulated mines.

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 U.S. EPA approved program for implementing the U.S. EPA 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 manage. 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 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)

Unallocated Program Activities

Due to limited staff resources, certain activities that fall within the purview of the Land Disposal Program are not prioritized and allocated staff time for the coming fiscal year including:

- Routine case management for facilities located in Northern counties
- 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 LEA.

1.5 Underground Storage Tank/Site Cleanup/DoD Programs

1.5.1 Program Overview

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 must 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.

Low-Threat Underground Storage Tank Case Closure Policy

On May 1, 2012, the State Water Board adopted the Low-Threat Underground Storage Tank Case Closure Policy, which is a statewide policy on the closure of leaking petroleum UST sites in California. The Policy applies to petroleum UST sites subject to Chapter 6.7 of the Health and Safety Code. The Policy establishes both general and media-specific criteria. If both the general and applicable media-specific criteria are satisfied, then the leaking UST case is generally considered to present a low threat to human health, safety and the environment and the case may be closed. Leaking UST cases closed under the Policy are issued a No Further Action letter by the Regional Water Board Executive Officer. In FY 2021-2022, UST Program staff prepared and transmitted 18 signed No Further Action letters.

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.

Site Cleanup Subaccount Program (SCAP)

The Site Cleanup Subaccount Program is a State Water Board grant funding program established in 2014 by Senate Bill 445, with annual appropriations of $34 million. SCAP was created to help investigate and remediate the harm or threat of harm to human health, safety, or the environment caused by existing or threatened groundwater contamination. To be eligible for SCAP funding, the applicant/site owner must lack other sources of funding and the site must represent a significant threat to human health or the environment, contain human-made contaminants, and be under a directive from the

regulatory agency. Region 1 Site Cleanup Program staff are currently managing five SCAP-funded projects in Region 1.

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 April 2022, there are 140 open UST program sites, 233 SCP sites, and approximately 24 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 protect and maintain high quality groundwater and to restore degraded groundwater. The Regional Water Board protects groundwater through Policies and Regulations providing relevant authorities for the regulation of waste discharges and restoration of groundwater quality including: a) Anti-degradation Policy; b) Filing of reports of waste discharge and prescribing waste discharge requirements (WDRs); c) Discharge limitations and cleanup levels; d) Cleanup and Abatement Orders; e) Cease and Desist Orders; f) Title 27 solid waste disposal; g) Monitoring and Reporting Programs and investigative orders; h) Enforcement Policy; i) OWTS Policy (aka septic systems); j) Regional Point Source Discharge Prohibition; and k) Salt and nutrient management plans (Recycled Water Policy).

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. Phase II is the development of a Policy Statement Resolution which, as drafted, directs staff to use all existing authorities to protect high-quality groundwater, restore degraded groundwater, and to develop a Work Plan for implementation of actions to address program implementation

challenges and complexities. Key actions include:

- Develop internal guidance for prescribing WDRs to include the process of prioritizing and conducting reviews and preparing revisions to individual WDRs and the possible transition of individual WDRs to general WDRs.
- Identify and implement appropriate regulatory authorities to protect groundwater quality from discharges covered by statewide general permits and policies (e.g. MS4, IGP, Recycled Water, OWTS Policy);
- Continue working with Local Agencies to develop effective Water Quality Assessment Programs for septic systems, in accordance with the OWTS Policy
- Continue requiring groundwater monitoring in Monitoring and Reporting Programs for recycled water projects in priority groundwater basins which lack an approved Salt and Nutrient Management Plan
- Develop a new category in the conditional waiver of waste discharge requirements for groundwater recharge using surface waters which provides groundwater quality protections while promoting groundwater recharge projects

As described in Section 8.1, Regional Water Board consideration of the Groundwater Protection Policy Statement Resolution is planned for October 2022.

During FY 2021-2022 the Groundwater Specialist provided input and supported the following:

- Preparing the Groundwater Protection Strategy Policy Statement Resolution
- Groundwater quality monitoring of domestic and agricultural wells in the Scott and Shasta groundwater basins
- The update of WDRs for several small community wastewater facilities
- Revision and approval of the Santa Rosa Plain Salt and Nutrient Management Planning Groundwater Monitoring and Reporting Plan
- Permitting for the beneficial reuse of dredge spoils in the Humboldt Bay and Crescent City Harbors.
- Investigative Orders for discharge of untreated industrial stormwater to groundwater.
- Technical review of reports and special studies associated with landfills and the discharge of treated municipal wastewater to groundwater.
- Development of Climate Change Adaptation and Resilience and Instream Flow Policy Statement Resolutions.
- Preparing comment letters for Groundwater Sustainability Plans in 6 medium priority groundwater basins regulated under the Sustainable Groundwater Management Act.

1.7 Irrigated Lands Regulatory Program

1.7.1 Program Overview

The North Coast Regional Water Board implements a broad Irrigated Lands Regulatory 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 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 Groundwater Permitting Unit. Regional Water Board's activities associated with the Agricultural Lands Discharge Program are also undertaken by the Cannabis and Enforcement Division and Nonpoint Source and Surface Water Protection Division.

Implementation of the ILRP is funded by annual fees paid by the agricultural community into the state's farm-water discharge waiver program, which was established by Senate Bill 390 in 1999 and provided 22 new positions to manage the program statewide. Of the 22 new positions, one position (1 PY) is allocated to the North Coast Region to implement the program in Region 1. As discussed in Section 9 of the Division Work Plan, 0.8 PY are allocated to development and implementation of the General WDRs for Vineyard Operations and shared between the new vineyard permit team and 0.2 PY are allocated to staff in the Nonpoint Source and Surface Water Protection Division for vineyard-related complaint response. Additionally, the Groundwater Permitting Unit currently has one staff who dedicates a portion of their work time (0.25 PY) to the ILRP for the implementation of the Smith River Plain Water Quality Management Plan (SRPWQMP). The dedicated Groundwater Permitting Unit staff developed and now implements a watershed stewardship framework that addresses water quality problems associated with lily bulb cultivation in the SRPWQMP and coordinates with stakeholders such as 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).

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. Information gained from implementing 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.

1.8 Program Updates to the Regional Water Board

Periodically, Division staff will provide written reports for the Executive Officer's Report on matters and developments related to Division programs. For FY 2022-2023, staff plan to prepare the following articles:

EO Report Articles	Target Date	Staff Lead
Plan for Transitioning Region 1 Wineries to coverage under the statewide Winery General Permit	August 2022	Rachel Prat
Status of implementation of Wastewater Consolidation Program in Region 1 (SB 1215)	October 2022	Mike Reese
Implementation of federal Pretreatment Program in Region 1	December 2022	Justin McSmith
Santa Rosa Plain Salt and Nutrient Management Planning and Groundwater Monitoring Plan	January/February 2023	Chris Watt
Status of OWTS Policy Implementation in Region 1	April/May 2023	Charles Reed
Status of Implementation of General WDRs for Composting Operations in Region 1	June 2023	Brenna Sullivan

2.0 DIVISION RESOURCES

2.1 Staffing

Three units and one specialist implement seven 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, (6) groundwater protection program, and (7) Irrigated Lands Regulatory 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	Base 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	Vacant	WRCE	1.0
NPDES Wastewater Program	Matt Herman	WRCE	1.0
NPDES Wastewater Program	Justin McSmith	WRCE	1.0
NPDES Construction Stormwater Program	Vacant	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	Vacant	Senior ES	1.0
Solid Waste/Land Disposal Program	Terri Cia	EG	1.0
Solid Waste/Land Disposal Program/ Irrigated Lands Regulatory Program	Brenna Sullivan	EG	1.0
WDR Waste to Land Program	Roy O'Connor	EG	1.0*

Position	Name	Classification	Base PYs
WDR Waste to Land Program	Rachel Prat	ES	1.0
WDR Waste to Land Program / SB1215 Sewer Consolidation	Michael Reese	WRCE	1.0
WDR Waste to Land 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
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	Michael Sullivan	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***

*Due to excess leave balances during the COVID emergency, some staff will be under mandatory leave reduction programs. This will reduce the total portion of PYs that are available as follows: Rhonda Raymond, reduced to approximately 0.82 PY; Roy O'Connor, reduced to approximately 0.6 PY.

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 enables program managers to establish program performance targets more accurately and provides 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 2022-2023 NPDES Wastewater Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	Prepare individual NPDES permits for new unpermitted facilities, renew existing NPDES permits, and enroll facilities under General NPDES permits	Core	On-going
1	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	Enforcement	Core	On-going
1	Staff Supervision	Core	On-going
1	Case Handling	Core	On-going
2	Program Management and Implementation	Core	On-going
2	Participation in Development of Statewide General Orders and Initiatives	Core	On-going
2	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, renew existing NPDES permits and enroll facilities under General Permits

Summary: As permit applications (reports of waste discharge) 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 2022-2023, 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). Permit development for the Fall Creek Hatchery and Nordic Aquafarms began in FY 2021-2022, but the permits will be brought for Board consideration and adoption in late 2022 or early 2023. Permit development for the Mark West Quarry permit will begin in FY 2022-2023 and is not expected to be completed during this fiscal year.

NPDES permits have a duration of five years, at which time they must be renewed[3]. Based on a review of the region's existing NPDES permits, other priorities within the program including case management, inspection, technical report review, support of enforcement efforts, and onboarding of new staff; the NPDES Unit plans to bring a total of six Wastewater NPDES permits during FY 2022-23 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.

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: Issuing new NPDES Permits and renewing existing NPDES permits takes a significant effort that spans over nine months of development and review before each permit can be brought to the Board for consideration of adoption. The current program has one vacancy that is expected to be filled by early FY 2022-2023. Staff anticipates that the new staff filling the vacancy will not produce NPDES permits as quickly as experienced staff, which may result in fewer permits brought for Board consideration and adoption in FY 2022-2023 than predicted.

PY Allocation for FY 2022-2023: 1.1

New NPDES Permits or Enrollments	Target Adoption Date
Nordic Aquafarms	October 2022
Fall Creek Hatchery	December 2022
General NPDES Permit Enrollments	Ongoing

Renewed NPDES Permits planned for Board Adoption	Target Adoption Date
Mendocino City CSD WWTP (Minor)	August 2022
City of Healdsburg WWTP (Major)	October 2022
Redway CSD WWTP (Minor)	December 2022

[3] The Clean Water Act specifies that NPDES permits may not be issued for a term longer than five years. Permittees that wish to continue discharging beyond the five-year term must submit a complete application for permit renewal at least 180 days prior to the expiration date of their permit. If the permitting authority receives a complete application but does not reissue the permit prior to the expiration date, the permit may be "administratively continued."

City of Eureka Elk River WWTP (Major)	February 2023

1.b – 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 2021-22 by the COVID pandemic and added to the backlog of inspections needed. Additionally, many of our regulated facilities benefit greatly from frequent inspection and oversight. Inspection and case management will be a focus of the program in 2022-2023. NPDES Unit plans to inspect a minimum of a total of seven facilities, as well as the five fish hatcheries in FY 2022-2023.

Key Issues to Resolve and Considerations: Inspections will be a focus of the program in FY 2022-2023 as it serves to provide compliance support, identify issues, determine the need for enforcement, inform permit renewal, and address the inspection backlog. Additionally, with new staff being hired into the program, inspection will serve as an important element to build experience, familiarity with the regulated facilities, and build strong relationships. Contracted and State Water Board sanitary sewer and pretreatment inspection support has either ended or been substantially reduced and is an additional task burden on staff. These inspections will be conducted as staff time allows.

PY Allocation for FY 2022-2023: 0.6

Facility Inspection	**Target Date to Complete**
Santa Rosa Laguna Subregional Water Reclamation Facility (Major)	August 2022
Windsor WTRDF (Major)	August 2022
Eureka City Elk River WWTP (Major)	June 2023
City of Arcata (Major)	June 2023
Town of Samoa (Minor)	June 2023
Fairhaven Power Plant (Minor)	June 2023
Ferndale POTW (Minor)	June 2023
Fall Creek Hatchery	June 2023
Coyote Valley Hatchery	June 2023
Mad River Hatchery	June 2023

Warm Springs Hatchery	June 2023
Trinity River Hatchery	June 2023

1.c – 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 (EPLs)/ACLs for permit violations subject to mandatory minimum penalties (MMPs) under Water Code section 13385. Resolving these violations has been a priority over the last year and will continue to be in this fiscal year workplan.

In FY 2021-2022, EPLs or ACLs were issued to 21 facilities with violations associated with MMPs. In FY 2022-2023, NPDES Wastewater Program staff will work closely with Enforcement Unit staff to complete imposition of ACLs for MMP violations at 9 NPDES facilities that are currently under way. Staff will evaluate any proposals to resolve the violations and participate in settlement discussions and/or enforcement hearings. Additional discretionary enforcement actions also may be taken.

Working though the ACL process helps to ensure that water quality violations are addressed, projects are completed to address the cause of non-compliance, and beneficial supplemental environmental projects are undertaken, whenever possible.

Timely assistance from program staff helps 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.” Coordination meetings are held between the units twice monthly to support this effort.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2022-2023: 0.3

1.d – 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. With the retirement of our most experienced NPDES Wastewater Program staff in FY 2021-2022 and hiring of a new staff person, additional work will be needed to provide onboarding, training, and additional review of work products for the new staff person.

Key Issues to Resolve: None

PY Allocation for FY 2022-2023: 0.3

1.e – Case Handling

Summary: Each NPDES Wastewater Program staff currently has assigned to them approximately 20 NPDES facilities, for which staff conducts routine case handling tasks throughout the year. Routine case handing 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.

For FY 2022-2023, review of the significant backlog of technical reports, submittal, and monitoring data which existed due to limited staffing and competing priorities will be a focus of the program this year. Many small disadvantaged and less sophisticated facilities need frequent and in-depth technical support and case handling for these facilities demands a larger time allocation.

Key Issues to Resolve and Considerations: A portion of these facilities will be assigned to a new staff person, but that staff will require additional training and onboarding as they take on facilities. Some training of the new staff will be undertaken by existing technical staff, which may reduce the time spent on facilities assigned to existing experienced staff.

PY Allocation for FY 2022-2023: 0.6

2.a – Program Management and Implementation

Summary: In FY 2022-2023, 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 and Considerations: New technical requirements such as drafting and integrating language to implement the new statewide Toxicity provisions continue to be developed and added to the permitting process. Additional ongoing coordination with DDW as it relates to recycled water will be of the utmost importance as the State faces unprecedented drought conditions.

PY Allocation for FY 2022-2023: 0.1

2.b – 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 2022-2023, 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 and Considerations: None.

PY Allocation for FY 2022-2023: 0.1

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 2022-2023: Variable

3.3 Performance Targets

Performance targets are set by both State Water Board and U.S. EPA for the NPDES Program. Currently how these targets are established and measured by each agency at the end of each year is significantly different. These differences often cause confusion about how well the program is doing, and creates scenarios where metrics are met according to one agency but not the other. Staff is currently working with the NPDES Roundtable, State Water Board, and U.S. EPA to discuss how to better align the use of performance metrics.

3.3.1 Performance Targets Reported to State Water Board via ORPP

Prior to the beginning of each fiscal year, the Region 1 NPDES Wastewater Program generates estimates for the number of NPDES permits that will be issued or reissued and the number of compliance inspections that are anticipated to be conducted during the next fiscal year. These estimates are expected to be consistent with workplan commitments derived by the State Water Board's Division of Water Quality and account for the major activities that comprise the Region's resource allocation (i.e., PYs) for the Program. Once generated, these estimates become "performance targets" for the NPDES Wastewater Program and are reported to the State Water Board' Office of Research, Planning, and Performance (ORPP). Only individual new or reissued wastewater NPDES permits count toward this performance target, and major and minor facilities are counted separately. Not counted in the State Water Board targets is all

work related to statewide and region-specific General Orders.

State Water Board Performance Targets for the last FY and proposed for FY 2022-2023

Fiscal Year	Major Facility Inspections	Major Facilities Permits Renewed/New	Minor Facility Inspections	Minor Facilities Permits Renewed/New
Target 2021-2022	4	2	4	3
Actual 2021-2022	4	0	6	3
Target 2022-2023	4	3	8	2

The two Major Facilities, Nordic Aquafarms and Elk River WWTP in Eureka, which we had planned to issue this last year and did not complete were both delayed due to issues outside of our control.

The Nordic Aquafarms facility is a new very large state of the art aquaculture and fish processing facility located on the Samoa Peninsula in Humboldt Bay. Due to the complexity of the facility, it was determined that the original mitigate negative declaration was not sufficient and that a full Environmental Impact Report needed to be developed. This EIR process is still currently underway and must be completed prior to the release of the Facility's draft NPDES permit for public comment.

The reissuance of the City of Eureka's NPDES permit for the Elk River WWTP was delayed due to the work necessary to resolve the issues related to the application of the Enclosed Bays and Estuaries Policy as well as to comply with the previously issued Cease and Desist Order. These efforts have required additional coordination with the City of Eureka and the State Water Board.

3.3.2 Targets Reported to U.S. EPA via CWA Section 106 Workplan

As established in the Memorandum of Agreement between the U.S. EPA and the State of California, the State Water Board prepares an annual work plan (Section 106 Workplan) that establishes the priorities, activities, and outputs for implementation of specific components of the federal NPDES and pretreatment programs for each fiscal year. The annual Section 106 Work Plan contains, at a minimum, 1) a list of NPDES permits or WDRs to be issued by the Regional Water Boards and 2) the number of facilities inspected. To reduce the number of NPDES permits backlogged (i.e., not reissued within five years of their expiration date), the U.S. EPA has set a target of adoption or rescission of 20 percent of active NPDES permits nationwide. Permit adoptions that count as qualifying actions by U.S. EPA in accordance with the Section 106 Workplan include all new and renewed individual permits (stormwater, wastewater, pump and treat, low treat, etc.), as well as all statewide and region-specific General Orders and permit rescissions.

Region 1 has 41 active NPDES permits. Therefore, the performance metric per U.S.

EPA is expected to be 8 permits (i.e., 20 percent) adopted, renewed, or rescinded each year. However, delivering eight permits to the Regional Water Board for adoption is not feasible given existing staffing levels, the loss of contractor support for permit development, new staff hires, new and complex technical issues such as statewide toxicity provision and recycled water requirements, and the need to support other priorities within the program. Consequently, the NPDES Unit plans to bring a total of six NPDES permits during FY 2022-2023 for Board consideration and adoption.

It is important to balance permit renewal efforts and other priorities within the program including case management, technical assistance to small, disadvantaged communities, inspection, technical report review, support of enforcement efforts, and onboarding of new staff. Many of the permitted facilities within Region 1 serve small, disadvantaged communities and need engaged case management, technical support, inspection, and review in order to operate effectively. Therefore, these tasks will be prioritized this workplan year.

U.S. EPA Performance Targets for the last FY and proposed for FY 2022-2023

Fiscal Year	Issued Permits	Facilities Inspected
Target 2021-2022	5	8
Actual 2021-2022	4	8
Target 2022-2023	6	12

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 2022-2023, the municipal storm water program will prioritize the development and reissuance of the Phase 1 Municipal Separate Storm Sewer System (MS4) Permit, as well as continue to take an active role in the development and implementation of the Phase 1, Phase 2, and Caltrans permits and continuing participation with State Water 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 TSS, 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. Efforts to identify and address industrial sites that have failed to enroll for coverage under the Industrial Stormwater Permit will continue in this workplan year. An additional effort to identify industrial sites that are impounding and infiltrating industrial stormwater and require that industrial site operators conduct the characterization work necessary to ensure the protection of groundwater.

Table 3 – FY 2022-2023 NPDES Storm Water Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	Manage NPDES permit NOIs, COIs, and NOTs	Core	On-going
1	Conduct site and facility inspections	Core	On-going
1	Conduct enforcement actions	Core/Special	On-going
1	Conduct general case handling tasks	Core	On-going
1	Participation in development of Statewide General Orders and Initiatives	Core	On-going
1	Renew Phase I MS4 Permit	Core	April 2022

Priority Level	Activity/Project	Category	Target Date
1	Staff Supervision	Core	On-going
2	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), COIs, and Notices of Termination (NOTs)

Summary: NPDES Stormwater Program staff plan to enroll under the Phase I MS4 Permit three existing, but currently unpermitted, entities: Sonoma Marin Area Rail Transit (SMART) Train, Sonoma State University, and Santa Rosa Junior College. Enrollments (Notice of Intent or NOI), change of information (COI), and terminations of coverage (Notice of Termination or NOT) under the statewide Industrial General Permit and the statewide Construction General Permit occur throughout the year and must be reviewed, the site inspected, and the action approved.

Key Issues to Resolve and Considerations: The Construction General Permit (CGP) position is currently vacant. While every effort is being made to fill this vacancy as quickly as possible, the new staff will need for training and onboarding. It is probable that this vacancy will impact the program in FY 2022-2023.

Even when fully staffed, 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 515 facilities enrolled, and 1.0 PY to implement the Construction Storm Water Program with 267 construction sites enrolled in the North Coast Region. Some additional support is provided from a Sanitary Engineering Associate.

PY Allocation for FY 2022-2023: 0.2

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 performance target that is reported and tracked by State Water Board of 40 inspections in the industrial stormwater program. Due to the current vacancy in the construction program and the need to train and onboard new staff, the performance target for the construction program will be 20 inspections. The MS4 Program must complete 1 Municipal inspection or program audit. 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. Written inspection reports must then be drafted, finalized, and posted to SMARTS.

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. Staff are in coordination with U.S. EPA to conduct Industrial Stormwater inspections on priority sites. Management will continue to pursue the option of hiring a scientific aid and/or other staff when feasible.

Key Issues to Resolve and Considerations: The Construction General Permit position is currently vacant. Any long delay in filling the vacancy, together with limited staff resources, may affect the ability of program staff to inspect all regulated facilities that need inspections in FY 2022-2023.

Additionally, the Klamath Dam Removal project is a significant project that will begin in FY 2022-2023 that will require CGP enrollment and oversight. It is anticipated that a portion of this role will be carried out by the CGP position once filled. A portion of that role is anticipated to be filled by staff from the Non-Point Source and Surface Water Protection Division.

PY Allocation for FY 2022-2023: 0.8

Milestones	Target Date
Conduct Site and Facility Inspections	On-going

1.c – Conduct Enforcement Actions

Summary: Currently, the Unit Supervisor, 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. Four of these cases are currently in settlement negotiations and two others are under development or in various stages of the enforcement process.

Multiple other sites are being managed under other enforcement and investigative orders including 13267 orders, 13383 orders, Notices of Violation, Cease and Desist Orders, and Notices of Non-Compliance. As of April 26, 2022, the following have been issued: 61 Notices of Violations, 16 Notices of Non-Compliance, 1 Cease and Desist Order, and 4 Water Code 13383 Investigative Orders. The team will continue to use these enforcement tools as well as numerous verbal and email communications to gain compliance.

Additional enforcement actions may occur, as necessary, during FY 2022-2023 that may include one or multiple site inspections, collecting samples, writing enforcement documents, providing compliance assistance, and developing formal enforcement documents (e.g., cleanup and abatement orders, cease and desist orders, investigative 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 good faith efforts 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 2022-2023: 0.7

Milestones	Status
Construction General Permit Action #1	Active
Construction General Permit Action #2	Active
Construction General Permit Action #3	Active
Construction General Permit Action #4	Active
Industrial General Permit Action #1	Active
Industrial General Permit Action #2	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: None

PY Allocation for FY 2022-2023: 0.3

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 2022-2023, NPDES Storm Water Program staff will continue to take an active role in the statewide subcommittee for the implementation and renewal of the Industrial Storm Water Permit, as well as the ongoing subcommittee for the statewide CalTrans MS4 Permit on coordination of permit implementation. In addition, staff will be supporting the development 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 in FY 2022-2023[4]. 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 case handling and enforcement of storm water permit related violations.

PY Allocation for FY 2022-2023: 0.2

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 2022-2023 on renewal of this permit. Remaining work tasks include: 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. Permit development is likely to include a public workshop and significant public comment. It is anticipated that the proposed Phase I MS4 permit will be brought to the Regional Water Board for consideration for adoption in FY 2022-2023.

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 Permits, have the potential to delay work on this permit renewal.

PY Allocation for FY 2022-2023: 0.7

Milestones	Target Date
Phase I MS4 Permit development, prepare administrative draft	June 2023

[4] The renewed Caltrans MS4 Permit is tentatively scheduled for State Water Board consideration in June 2022. The renewed Construction General Permit is tentatively scheduled for State Water Board consideration in July 2022. Consideration of the Phase 2 MS4 Permit is anticipated in late 2023.

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: With the vacancy in our construction program, additional work will be needed hire a new staff person, provide onboarding, training, and additional review of work products for the new staff person.

PY Allocation for FY 2022-2023: 0.3

2.a – Unplanned Work Activities (see previous)

PY Allocation for FY 2022-2023: Variable

4.3 Performance Targets

4.3.1 Performance Targets Reported to State Water Board via ORPP

Performance Targets for the last FY and proposed for FY 2022-2023

Fiscal Year	Municipal Phase I/II Inspections/Audits	Construction Inspections	Industrial Inspections
Target 2021-22	1	40	40
Actual 2021-22	3	50	40
Target 2022-23	1	20	40

Beginning in FY 2019-2020, the 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 each fiscal year since, NPDES Stormwater Program staff have met all inspection targets, even accounting for the impacts of COVID.

Even though Stormwater Program staff have consistently met the performance targets for inspections, which are the only performance targets established and tracked by the State Water Board, implementation of the federal stormwater program in Region 1 includes other tasks including case management of the 22 MS4 Phase 1 and Phase 2 Permittees and preparing the new Phase 1 MS4 permit for Board hearing and adoption. Taken together, completing all tasks described in this Work Plan would require a staff allocation of 7 PYs, based on current statewide cost factors established for these tasks. The Region 1 stormwater program currently has a total of 3 PYs, and one of those

positions is vacant.

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 2022-2023:

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 over 40 small DACs and Tribal projects that are in the planning or construction phase. In FY 2022-2023, staff will focus its limited staff resources on supporting projects identified as high priority by the priority ranking effort.

2. Address the backlog of enrollments for facilities eligible for coverage under the statewide general orders and regional general orders.

To make most efficient use of limited staff resources, the Discharge to Land Program intends to maximize use of available statewide general WDRs for new applications for waste discharge and for replacing existing WDRs whose requirements are significantly outdated. Orders greater than five years old generally do not include the most recent regulations, including, but not limited to: the updated chemical constituents and groundwater toxicity objectives contained in the Basin Plan as amended in 2016; and effluent limitations and/or monitoring requirements for salts and nutrients as part of the regional implementation of the Recycled Water Policy as amended in 2018. Therefore, reviewing and updating the 109 outdated Orders is a high priority for the WDR program, which also implements the priority actions of the Groundwater Protection Strategy as summarized below.

Out of the 109 individual WDRs active in the North Coast Region that are greater than five years old, 61 are eligible for enrollment in general orders. The remainder are ineligible for coverage under a general order or are more appropriated regulated under individual WDRs, as follows:

- 27 are eligible for the General WDRs for Small Domestic Wastewater Treatment Systems (Water Quality Order No. 2014-0153-DWQ).
- 29 are eligible for the statewide General WDRs for Winery Process Water (Winery Order) adopted in 2021.

- Five (5) are eligible for the General WDRs for Wine, Beverage, and Food Processing (WBFP) Waste (Order No. R1-2016-0002 or Waiver of WDRs for WBFP (Order No. R1-2021-0001).

For FY 2022-2023, staff plan to enroll 30 facilities with outdated existing regulatory measures under more current statewide general orders. Staff plan to update and revise four individual WDRs including Geysers Power Company LLC, Roseburg Forest Product, Hopland Public Utilities District, and Manilla Community Service District (CSD). Program staff continue evaluating older WDRs for municipal/domestic wastewater and winery facilities and prioritizing WDRs for future permit updates.

3. Implement the Region 1 Winery Transition Plan.

The regulatory program for wineries in Region 1 currently uses five existing regulatory measures for 102 wineries including the: 2002 General Order for Wineries (R1-2002-0012); 2016 Wine, Beverage and Food Processor (WBFP) General WDRs (R1-2016-0002) and Waiver of WDRs (R1-2021-0001); the 2017 Low Threat Categorical Waiver (R1-2017-0039); and over 30 individual WDRs. In FY 2021-22, staff developed a transition plan that identifies 97 wineries eligible for enrollment in the new statewide order. Based on data provided by State Water Board staff, there are approximately 500 existing unregulated wineries in the North Coast Region. The number of new wineries to be constructed in the North Coast Region is unknown; however, Regional Water Board staff must be prepared to process those applications along with the existing unregulated winery applications in order to meet the expectations of the State Water Board. In March 2022, staff received a Notice of Intent (NOI) for the new statewide Winery Order, which is currently being processed and is the first and only application for the new order thus far. The deadline date for existing unregulated wineries to apply for enrollment is January 20, 2024. The transition plan identifies processing new applications from unregulated facilities as the top priority for the winery program. Transitioning the 97 facilities with existing regulatory measures is the second level priority for the program. In FY 2022-2023, staff plan to begin transitioning the facilities enrolled in the 2002 General Order for Wineries and individual WDRs under the statewide order, followed by the 2017 Low Threat Waiver. The WBFP WDRs and Waiver of WDRs are relatively up-to-date regulatory measures and therefore are the lowest priority for transition to the new statewide general order.

4. Implement the Groundwater Protection Strategy.

The Groundwater Protection Strategy Action Items List is prioritized based on level of effort and water quality benefit and incorporated into annual work planning by division staff. In FY 2022-2023, Program staff, with the support of the Groundwater Specialist, will:

- Develop a WDR permit writing internal guidance document and continue development of WDRs permit writers procedures manual and permit development process. The guidance document will provide sample permit language, findings, and prohibitions and include direction for staff for making permitting decisions such as evaluating potential of a discharge to degrade water

quality, using existing water quality data, evaluating the presence of high quality groundwater and sensitive receptors, translating narrative water quality objectives into numerical water quality objectives, and establishing protective effluent limitations and monitoring/reporting requirements.

- Work with Local Agencies to develop effective Water Quality Assessment Programs for onsite wastewater treatment systems that demonstrate the effectiveness of the local programs to protect water quality.
- Promote groundwater recharge projects by developing General WDRs or waivers of WDRs for projects that recharge groundwater using surface water.
- Refine the process of prioritizing and conducting review/update of individual WDRs and the possible transition of individual WDRs to general WDRs
- Prioritize review based on priority groundwater basins, facility flow, date of permit, DAC support needed, and history of violations. Rank facilities based on these factors and the facilities threat to water quality using existing data or the need for groundwater monitoring to inform potential changes to WDRs.
- By implementing these priority actions staff are focusing limited resources on supporting DACs; updating permits for facilities in priority groundwater basins[5]; facilities with higher flows, violations, and threat to water quality; and opportunities to increase the production and use of recycled water.
- 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. Once a local agency receives Regional Water Board approved of its LAMP, Discharge to Land Program staff will transition several OWTS from Regional Water Board permitting to local oversight and focus Program resources on Regional Water Board permitting and oversight of larger wastewater facilities throughout the Region. The Sonoma County LAMP will incorporate the Russian River Watershed Pathogen TMDL Action Plan's Advanced Protection Management Program (APMP) in the lower Russian River, which will address failing septic systems that may be contributing to the surface water impairment.

5. Implement Statewide GeoTracker Initiative.

Statewide, the efficient management of the Discharge to Land (Non-Chapter 15 WDR), Irrigated Lands, Land Disposal, and Recycled Water Programs (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

[5] Priority groundwater basins as identified in Resolution R1-2021-0006 Groundwater Basin Evaluation Prioritization Results Supporting Salt and Nutrient Management Planning as Required by the State Water Resources Control Board Recycled Water Policy

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.

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. Implementation of the Program Strategy is expected to require additional time and resources for internal training and outreach to dischargers 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 2022-2023 Program Core Activities and Projects by Priority

Priority Level	Activity/Project[6]	Category	Target Deadline
1	Prepare New WDRs and General WDR Enrollments	Core	Ongoing
1	Prepare Revised WDRs and Rescission Orders for existing Facilities	Core	Ongoing
1	Provide technical and compliance assistance to Disadvantaged Communities	Special	Ongoing
1	Conduct stakeholder outreach for Russian River Watershed Pathogen TMDL Early Implementation	Special	Ongoing
1	Review/Approve Local Agency Management Programs	Special	Ongoing

[6] 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).

Priority Level	Activity/Project[6]	Category	Target Deadline
1	Staff Supervision[7]	Core	On-going
2	Review Self-Monitoring Reports and Conduct Follow up	Core	Ongoing
2	Respond to State Water Board WDR Program requests and participate in development of statewide general permits	Special	Ongoing
2	Conduct Facility inspections and prepare inspection reports	Core	Ongoing
2	Case handling, responding to complaints, and emerging Facility issues	Core	Ongoing
3	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. Only one new individual WDRs, for the Willow Creek CSD, is proposed for adoption in FY 2022-2023. In FY 2022-2023, staff plans to focus on facilities with outdated individual WDRs by enrolling 30 facilities under general orders. 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. For example, as noted above up to 500 unregulated wineries could submit applications for enrollment under the new Winery Order.

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. In order to focus on reducing the backlog of outdated individual WDRs, unit staff will focus on new enrollments into general WDRs and

[7] 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.

enrolling outdated individual WDRs into more up to date general orders.

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, the need for DDW review and approval of Title 22 Engineering Reports for recycled water production and/or use, property transactions, funding delays, and litigation can create delays in scheduling board agenda items. The number of new enrollments completed during any fiscal year is highly unpredictable because it is dependent on the number of new applications received. At this time all PY allocations are dedicated towards enrolling existing facilities with older requirements under relatively new general orders. However, the number one priority is processing new applications as they come in, so, staff will adjust their individual work plans to accommodate any new applications.

PY Allocation for FY 2022-2023: 1.1 (0.2 PY allocated to WDR staff, with 0.1 PY overlapping from DAC support for Willow Creek CSD; 0.1 PY allocated to SB1215 staff for developing an applicable regulatory measure for the Russian River TMDL implementation; and 0.7 PY allocated to general order enrollments.)

New WDR Order Issuance	Target Date
Willow Creek CSD WWTP	December 2022
General WDR Order Enrollments	On-going

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

Summary: The guidelines of the administrative procedures manual (APM) require that WDRs should be reviewed on a frequency of three, five, or ten years based on the discharger's Threat to Water Quality (TTWQ). TTWQ is defined in Chapter 2 of the Water Quality APM. WDR Program managers and the State Water Board have revised these timeframes through the statewide roundtable and amended the WDRs review and update timeframes to five, ten, and 15 years. WDRs that have not been reviewed/updated according to the required frequency are considered by the State Water Board to be backlogged. Based on a review of the region's 121 existing WDRs, the Groundwater Permitting staff plans to enroll 30 facilities under general WDRs and develop one associated multi-facility recission order, and update four individual WDRs that are not otherwise eligible for general WDRs. In addition, during FY 2022-2023, Groundwater Permitting staff will propose for renewal the low threat waiver of waste discharge requirements for specific categories (Order No. R1-2017-0039), which expires on December 13, 2022. The low threat waiver update will propose a new low threat category: "Discharge of diverted flood surface waters to agricultural lands, working landscapes, or open space for aquifer recharge." The new waiver category is anticipated to streamline permitting of projects that augment groundwater supplies and offset surface water use during low-flow periods.

Facilities with Planned Permit Updates

Existing WDR Order Revision	Target Date
Conditional Waiver of WRDs for Specific Categories of Low Threat Discharges (R1-2017-0039)	December 2022
Geysers Power Company LLC (R1-2009-0103)	April 2023
Roseburg Forest Products (93-086)	April 2023
Hopland Public Utilities District WWTP (R1-2008-0003)	April 2023
Manilla CSD WWTP (95-02)	June 2023
WDR Multi-Party Rescission Order	June 2023
General Order Enrollments (30 existing facilities)	Ongoing

In some cases, particularly for low threat discharges, facilities regulated under individual WDRs may be more appropriately regulated under the statewide general WDRs for 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 2022-2023 that will rescind between ten and 20 existing individual WDRs, for OWTS with wastewater flows under 10,000 gallons per day which are eligible for oversight by a local agency and facilities that are eligible for regulation under general orders. 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 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. At this time, all PY allocations are dedicated to enrolling existing facilities with older requirements under relatively new general orders. However, the number one priority is processing new applications as they come in, so, staff will adjust their individual work plans to accommodate any new applications.

PY Allocation for FY 2022-2023: 0.7 (Additional 0.1 PY allocated to the Scientific Aid developing the Rescission Order). This allocation may adjust depending on the number of new enrollment applications received. Until new applications are received, staff hours in section 1.a. above are currently allocated towards enrolling existing facilities with outdated requirements under relatively newer general orders.

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 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 40 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 2022-2023 is continued early implementation activities for the Russian River Watershed Pathogen TMDL Action Plan, work that includes public outreach to owners of 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 2022-2023.

Key Issues to Resolve and Considerations: With approximately 40 wastewater treatment facilities in disadvantaged or severely disadvantaged communities in the North Coast Region, prioritization and thoughtful use of our resources is a challenge. Tracking the upgrade needs and status of financial assistance contracts could be a full-time job for staff within the unit. With the new funding provided by SB1215, a single staff is dedicated towards serving the needs of our DACs and focusing on opportunities for wastewater consolation to address failing OWTS. However, these projects are complex and often take several years to fully develop into a permittable projects. Therefore, careful tracking and coordination is necessary to ensure that these projects continue a path towards completion.

PY Allocation for FY 2021-22: 0.65 (0.1 PYs for technical and compliance assistance to DACs by WDR staff, 0.35 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 in late 2022 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 2022-2023 but is contingent upon approval by Sonoma County first. 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 2022-2023: 0.03

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 Land Disposal/IRLP staff requires dedicated time to conduct training on internal processes, legal authorities, and roles and responsibilities. For FY 2022-2023, approximately 0.1 PY of the new staff position will be dedicated to onboarding-related tasks.

PY Allocation for FY 2022-2023: 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, or to address permit violations. Groundwater Permitting Unit staff has committed to review 100 SMRs in FY 2022-2023, focusing on facilities that are scheduled for updates, being

enrolled in new regulatory measures, and 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 2022-2023: 0.2 (Plus 0.3 PY from Scientific 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 2022-2023, Groundwater Permitting Unit staff will continue engaging in statewide programmatic WDR roundtable meetings and their associated subcommittees (e.g., 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 outreach and implementation of the new General WDRs for Sanitary Sewer Systems is unknown at this time but has the potential to divert Groundwater Permitting staff resources away from other division priorities.

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 2022-2023: 0.25, but variable because requests for and degree of input is unpredictable (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 – 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 2022-2023, Groundwater Program staff plan to conduct 19 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 but is expected to level off at the projected number for FY 2022-2023 for the foreseeable future.

PY Allocation for FY 2022-2023: 0.2 (Plus 0.05 PY from Scientific Aid)

2.d – 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 2022-2023 (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 2022-2023: 0.5

3.a – Unplanned Work Activities (see previous)

PY Allocation for FY 2022-2023: Variable

5.3 Performance Targets

Performance Targets for FY 2021-2022 and Proposed Targets for FY 2022-2023

In FY 2021-2022, despite the global pandemic, 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 increased the planned pace of general WDR enrollments from a target of eight in FY 2020-2021 (40 completed) to a target of 12 in FY 2021-2022; however, staff did not meet that target by only completing six enrollments including: one under the General WDRs Small Domestic WWTPs; one under the WBFP General WDRs; one under the Low Threat Categorical Waiver; two under the WBFP General Waiver; and one under the new statewide winery order. The target for updating three individual WDRs was exceeded as staff are on track to complete four individual WDRs including: Roblar Quarry, City of Point Arena WWTP, Happy Camp WWTP, and Gualala CSD. Targets for compliance and other inspections were narrowly missed due to COVID-19 shelter in place orders that prevented staff from conducting field inspections for most of the fiscal year. 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 2021-2022 and Proposed Targets for FY 2022-2023

Fiscal Year	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
2021-22 Target	4 to 20[8]	12	3	16	3	100
2021-22 Completed	6	6	4	13	1	398

[8] Over a dozen orders may be rescinded if local agency management plans (LAMPs) are submitted by the counties and approved by the Regional Water Board.

2022-23 Target	10 to 39[9]	30[10]	5[11]	21	2	100

[9] Over a dozen orders may be rescinded if local agency management plans (LAMPs) are submitted by the counties and approved by the Regional Water Board.
[10] Includes new applications received and existing facilities enrolled under general orders as new regulatory measures.
[11] Includes the renewal of the Conditional Waiver of WRDs for Specific Categories of Low Threat Discharges (Order No. R1-2017-0039)

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 2022-2023:

1. Oversee Sonoma County's Central SWDS landfill expansion.

Region 1 has one active landfill, Sonoma County's Central Solid Waste Disposal Site (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 to provide for immediate capacity needs, which requires staff oversight of planning and design and construction sequencing steps. The landfill operator, Republic Services, is seeking long term capacity management coordination with Regional Water Board staff.

2. Revise Waste Discharge Requirements for the Annapolis SWDS.

Staff will be preparing individual WDRs for monitoring and maintenance of the cap, and monitoring and reporting requirements for landfill gas, leachate, groundwater, and surface waters.

3. Continue Enrolling Composting Facilities Under the Statewide General WDRs for Composting Operations.

Adopted on August 4, 2015, the General Compost Order established a streamlined permitting process for private and public entities or persons performing composting operations. The General Compost Order contains requirements for composting operations to manage wastewater; and includes specifications for surface water setbacks, depth to groundwater, allowable feedstocks, drainage, working surfaces, and detention ponds. The North Coast Region has received five Notices of Intent (NOIs) for enrollment into the General Compost Order.

4. 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:

- SWRCB Order No. WQ 2020-0004-DWQ, General Waste Discharge Requirements for Disaster-related Wastes
- Regional Board Order No. R1-2017-0056, 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 2022-2023 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Deadline
1	Prepare Revised WDRs for Annapolis Solid Waste Disposal Site	Core	June 2023
1	Composting Operations GWDR enrollments	Core	Ongoing
1	Conduct facility oversight, inspections, and case handling	Core	Ongoing
1	Manage Sonoma County Central SWDS	Core	Ongoing
1	Staff Supervision	Core	Ongoing
2	Respond to State Water Board WDR Program requests	Special	Ongoing
2	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 Annapolis Solid Waste Disposal Site

Summary: The Annapolis Solid Waste Disposal Site (SWDS) is a closed Class III landfill regulated under WDRs Order No. 96-44. Land Disposal Staff plan to prepare a revision to the existing order to update requirements and account for recent changes in operations.

Key Issues to Resolve and Considerations: Due to limited staff resources, 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. In November 2020, the City of Ukiah released an Environmental Impact Report (EIR) for the City of Ukiah SWDS that is being litigated by local environmental groups. Adoption of the City of Ukiah SWDS Closure WDRs is dependent on the completion of a certified CEQA document. As responsible agency under CEQA, the Regional Water Board relies on the certification of the EIR when adopting the WDRs. If the CEQA litigation is resolved by October 2022, the revision of WDRs Order No. 96-44 for the Annapolis SWDS may be postponed and staff resources reallocated toward preparation of final closure WDRs for the City of Ukiah SWDS.

PY Allocation for FY 2022-2023: 0.23

Milestones	Target Date
Revise WDRs for Annapolis Landfill SWDS	June 2023

1.b – Composting Operation General WDRs Enrollment

Summary: Land Disposal staff are reviewing Notices of Intent and technical reports for composting operations located in the North Coast Region that are required to obtain coverage under the statewide General WDRs for Composting Operations. The North Coast Region has received five NOIs for enrollment into the General Compost Order including:

- Hambro Forest Products located in Crescent City, Del Norte County. They accept agricultural material, green waste, and manure and qualify for an enclosed vessel exemption.
- Cold Creek Compost located in Ukiah, Mendocino County. They are a Tier 2 facility and accept agricultural material, green material, paper material, residentially collected food and green material, food material, manure, and vegetative food material.
- Mendocino Earth Products in Ukiah, Mendocino County. They are a Tier 1 facility and accept agricultural material and green material.
- Wes Green Compost in Arcata, Humboldt County. They are a Tier 1 facility and accept green material.
- Grab ‘N Grow in Santa Rosa, Sonoma County. They are a Tier 2 facility and accept agricultural material, green material, and manure and are Tier 2.

In 2019, the NOIs and Technical Reports for four other operations not eligible for an exemption were deemed incomplete. The Land Disposal program has been without one fulltime staff since September 2020 stalling the enrollment of composting facilities. Staff will resume assisting each applicant to gather the necessary information for complete NOIs; and will concurrently work on formal enrollment letters with comments on the Technical Reports for each facility. Following enrollment, staff will inspect the facilities, evaluate any needs for site improvements, and communicate any compliance deadlines. Staff will enroll two facilities in FY 2022-2023 and two facilities in FY 2023-2024.

Key Issues to Resolve and Considerations: Resources may need to be reallocated if the City of Ukiah Landfill CEQA litigation is resolved.

PY Allocation for FY 2022-2023: 0.2

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

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 12 compliance inspections for FY 2022-23. Other oversight activities are

unpredictable and therefore, unscheduled (for example, case handling as a result of high precipitation, fire impacts, or other natural disasters).

Key Issues to Resolve and Considerations: In FY 2021-2022, Unit staff enrolled four facilities under the applicable WDRs 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. 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 2022-2023: 0.37

1.d – Manage Sonoma County Central SWDS

Summary: Oversee and manage Sonoma County/Republic Services Central SWDS permit, which is scheduled for consideration for adoption by the Regional Water Board in June 2022. Oversee ongoing WDR Compliance Time Schedule Order deliverables requires for project implementation. Facility is undergoing rapid expansion planning, design and construction sequencing to provide for immediate capacity needs resulting from three natural disaster clean up processes which have effectively consumed the existing constructed capacity. The Rock Extraction Area, Sub-Title D- New Unit expansion landfill project is underway requiring considerable staff resources.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2022-2023: 0.1

1.f – Staff Supervision

Summary: See previous description.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2022-2023: 0.2 (supervision) 0.1 (for staff onboarding)

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 Land Disposal 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. Staff will continue engaging in statewide program roundtable meetings and their associated subcommittees 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. In FY 2022-2023, 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 2022-2023: 0.75

2.b – Unplanned Work Activities (see previous)

PY Allocation for FY 2022-2023: Variable

6.3 Performance Targets

6.3.1 Performance Targets for FY 2021-2022

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. 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 City of Ukiah SWDS is not yet certified, preventing staff from finalizing the permit. Failure to meet the SMR review target in FY 2021-2022 was due to the extended vacant Land Disposal Program position for that fiscal year. The higher targets for FY 2022-2023 reflect higher performance expected due to filling the Program vacancy in April 2022.

Table 6 – Performance Targets for the FY 2021-2022 and Proposed Targets for FY 2022-2023

Fiscal Year	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2021-2022 Target	1	1	0	8	8	3
2021-2022 Completed	1	0	0	8	3	3
2022-2023 Target	1	2	0	12	12	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 7. Some are described in detail in Section 7.2.

Table 7 – FY 2022-2023 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Deadline
1	Reviewing and responding to submitted investigation and remediation reports and plans for open cases	Core	Ongoing
1	Prepare and issue directive letters	Core	Ongoing
1	Review all monitoring reports for open cases	Core	Ongoing
1	Prepare enforcement actions	Core	Ongoing
1	Keep all records up to date	Core	Ongoing
1	Manage case work time to match budgeted program hours.	Core	Ongoing
1	Staff Supervision	Core	Ongoing
2	Perform site inspections	Core	Ongoing
2	Review stalled case load and determine next actions to move stalled cases forward (e.g., enforcement, contacting new property owners, etc.)	Core	Ongoing
2	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 public 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. Plans of potential for site redevelopment, which makes funding for remediation more available
6. Cooperation or recalcitrance of responsible parties; funding availability
7. Public interest
8. Achieving case closure
9. Other

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 at that time. When old USTs were removed from the ground, contamination was frequently detected which led to the Regional Water Board opening UST cleanup cases for those sites. With the upgraded storage tank 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 126 open active UST cases.

Key Issues to Resolve and Considerations: The UST Cleanup Fund (Fund), established by SB 299 in 1989, requires owners of petroleum 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 quickly UST sites are investigated and cleaned up and how staff regulates Cleanups cases in the future. Termination of the UST Cleanup Fund 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 2022-2023: 4.5 within the unit.

Site Cleanup Program

Summary: The Site Cleanup Program (SCP) 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 Water 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 Water Board's Site Cleanup Subaccount (SCAP) 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 146 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. While funding options remain, the Site Cleanup Subaccount Program offers a couple of grants per year per region for sites that are high priority, but they do not cover most of the sites in need of work. In addition, 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 2022-2023: 3.4

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 31 open (SCP and UST) FUDS cases (active and inactive), and 11 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 2022-2023: 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 oversite 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 2022-2023: 0.1, but variable as the occurrence of hazardous

material spills requiring Regional Water Board staff response is unpredictable.

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

Summary: SCP 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 SCP 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 2022-2023: 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 Water Board via ORPP

Performance Targets for FY 2021-2022 and Proposed Targets for FY 2022-2023

Performance Targets	FY 2021-2022 Target	FY 2021-2022 Reported	FY 2022-2023 Target
# of DoD Sites New into Active Remediation	0	0	0
# of SCP Sites New into Active Remediation	2	1	1
# of SCP Sites Projected Closed	4	9	4

# of UST Sites New into Active Remediation	3	0	0
# of UST Sites Projected Closed	10	12	10

Although not included on the table above, 3 DoD sites in Region 1 were closed during the FY 2021-22 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 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 exceeded the FY 2021-2022 target of 10 for number of UST sites closed, with 12 UST sites closed and exceeded the target of 4 SCP sites closed with 9 SCP sites closed. The targets were not met for “Sites New into Active Remediation” because most of the sites are not new releases, often decades old, and thus many sites have already entered into the remediation phase. Because this status is not expected to change during FY 2022-2023, targets for this metric were reduced accordingly for FY 2022-2023.

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[12]	Category	Target Deadline
1	Finalize the Groundwater Protection Policy Statement Resolution for Regional Water Board Consideration	Core	October 2022
1	Provide technical support to Regional Board staff	Core	On-going
1	Continue engaging with local, regional, state, tribal, and federal agencies which influence the monitoring, protection, and restoration of groundwater quality	Special	On-going
2	Participate in Implementation and Development of Statewide General Orders and Initiatives	Special	On-going
2	Support the implementation of Action Items in the Groundwater Protection Strategy Policy Statement Resolution	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 – Finalize the Groundwater Protection Policy Statement Resolution

Summary: The Groundwater Protection Program will bring forth the Groundwater Protection Policy Statement Resolution, which describes current conditions, existing authorities, and program implementation challenges/complexities, while issuing a position statement directing staff to use all existing authorities to protect high-quality groundwater, restore degraded groundwater, and to develop a Work Plan for

[12] 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.

implementation of actions to address implementation challenges/complexities. Through Resolution R1-2021-0006, 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 September 2022 followed by a hearing to consider adoption at the October 2022 Board meeting.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2022-2023: 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 Resolution Adoption	October 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 analyses, 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. The Groundwater Specialist may also serve as staff technical expert on Regional Water Board enforcement cases.

In FY 2022-2023, 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: For FY 2022-2023, the Groundwater Specialist is participating as senior lead staff for a cross-program team developing the General WDRs for Vineyard Operations. His participation is this high priority task may result in less support for other groundwater protection efforts and less participation in Regional Water Board enforcement cases.

PY Allocation for FY 2022-2023: 0.2 (Senior Specialist) and various PY fractions from team members. As needed, some or all of PYs for Task 1.b may be redirected to development of the General WDRs for Vineyard Operations.

1.c – Continue engaging with local, regional, state, tribal, and federal agencies which influence the monitoring, protection, and restoration of groundwater quality

Summary: A key task for the Groundwater Specialist is to develop and strengthen external partnerships to monitor, protect, and restore groundwater quality. 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 Groundwater Specialist provides expertise and recommendations to develop project descriptions and identify data gaps. 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
- Tribal stakeholders
- Local stakeholders including governments, businesses, and non-profits
- University of California
- U.S. Geological Survey
- State Water Board and Regional Water Boards

Key Issues to Resolve and Considerations: For FY 2022-2023, the Groundwater Specialist is participating as senior lead staff for a cross-program team developing the General WDRs for Vineyard Operations. His participation is this high priority task may result in less support for strengthening external partnerships.

PY Allocation for FY 2022-2023: 0.1 Senior Specialist. As needed, some or all of PYs for Task 1.c may be redirected to development of the General WDRs for Vineyard Operations.

2.a – Participate in Implementation and Development of Statewide General Orders and 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 2022-2023, the Groundwater Team, led by the Groundwater Specialist, will continue assisting State Water Board staff. Key projects include:

- Updates to General Permits for the Discharges of Storm Water from Municipal Separate Storm Sewer Systems (Phase II MS4). Discharges of stormwater and non-stormwater from an MS4 have a high potential to convey pollutants to groundwater (e.g., heavy metals, bacteria, nutrients, pesticides, petroleum hydrocarbons). The long-term effectiveness of the infiltration based BMPs at controlling the discharge of pollutants to groundwater (esp. constituents of emerging concern) from stormwater infiltration BMPs is not well understood.
- Updates to the Industrial General Permit which covers nearly 400 facilities in the North Coast Region. The IGP encourages the use of infiltration based BMPs that include protections for groundwater. Many dischargers have reduced and/or eliminated surface discharges of industrial stormwater through the use of infiltration BMPs, however, sampling and analysis is not being performed to conclusively demonstrate that groundwater quality is being protected as a result of this stormwater management practice.

Key Issues to Resolve and Considerations: For FY 2022-2023, the Groundwater

Specialist is participating as senior lead staff for a cross-program team developing the General WDRs for Vineyard Operations. His participation is this high priority task may result in less support for development and implementation of statewide general orders and initiatives.

PY Allocation for FY 2022-2023: 0.2 Senior Specialist. As needed, some or all of PYs for Task 1.b may be redirected to development of the General WDRs for Vineyard Operations.

2.b – Support the Implementation of Action Items in the Groundwater Protection Policy Statement Resolution

Summary: The Groundwater Protection Strategy Policy Statement Resolution directs staff to use all existing authorities to protect high-quality groundwater, restore degraded groundwater, and to develop a Work Plan for implementation of actions to address implementation challenges and complexities. In FY 2022-2023, the Groundwater Specialist anticipates supporting Groundwater Permitting Program staff in the following areas:

- Developing internal guidance for prescribing WDRs;
- Working with Local Agencies to develop effective Water Quality Assessment Programs for septic systems
- Develop a new conditional waiver category for groundwater recharge using surface waters to be added to the Conditional Wavier of Waste Discharge Requirements For Specific Categories of Low Threat Discharge (R1-2017-0039) which is anticipated to be considered for re-adoption by the Regional Water Board in December 2022.

Key Issues to Resolve and Considerations: Staff resources for this program in FY 2022-2023 are limited to the Groundwater Specialist and other division staff as needed and re-directed by Executive Management.

PY Allocation for FY 2022-2023: 0.05 Senior Specialist

8.3 Performance Targets

8.3.1 Reported to State Water Board via ORPP

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

9.0 IRRGATED LANDS REGULATORY PROGRAM

9.1 Core Activities and Projects by Priority

The primary responsibilities of Irrigated Lands Regulatory Program (ILRP) staff are categorized based on priorities listed in Table 8. Some are described in detail in Section 9.2. The cornerstone to the IRLP is the development and implementation of agricultural lands permits. The North Coast Region has 1.8 PY dedicated to this program for permit development and watershed stewardship. For FY 2022-2023, the Groundwater Permitting Unit, with assistance from the Groundwater Specialist, Watershed Stewardship Coordinator (through July 2022), and Cannabis Program staff, is developing a vineyard permit and implementing the Smith River Plain Water Quality Management Plan. The ILRP Program staff has identified the following priorities for FY 2022-2023:

1. *Adoption of General WDRs for Vineyard Properties in the North Coast Region by October 2023.* Region 1 has been developing draft WDRs 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 will continue with stakeholder outreach with representatives from the vineyard industry, environmental groups, and agency partners, 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. *Implementation of Smith River Plain Water Quality Management Plan (SRPWQMP).* Staff has been working under the technical guidance of the Watershed Stewardship Coordinator to implement a watershed stewardship framework that addresses 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. Elements of the SRPWQMP 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 2022-2023 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Deadline
1	Prepare Public Review Draft WDRs for Vineyard Operations and Draft CEQA Documents	Core	Fourth Quarter FY 2022/2023
1	Adoption of Proposed WDRs for Vineyard Operations and Final CEQA Documents	Core	Second Quarter FY 2023/2024

Priority Level	Activity/Project	Category	Target Deadline
1	Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the SRPWQMP	Core	On-going
1	Staff Supervision	Core	On-going
2	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 Public Review Draft WDRs for Vineyard Operations and Draft CEQA Documents

Summary: A new cross-program team of Regional Water Board staff will be working on the project to further develop and finalize the permit. Staff will continue work begun in FY 2019-2020 to develop the Administrative Draft WDRs for Vineyard Operations (Administrative Draft). The Administrative Draft has been reviewed at the senior level with input from the region's senior specialists and currently includes enrollment tiers relative to water quality risk, prohibitions, specifications, provisions, findings, as well as a monitoring and reporting program and third-party requirements. The Administrative Draft is scheduled to be ready for executive level review by the First Quarter of FY 2022-2023.

Development of the Public Review Draft WDRs for Vineyard Operations (Draft WDRs for Vineyard Operations) will continue and is scheduled to be released for public review in the fourth quarter of FY 2022-2023. Draft CEQA documents are also expected to be completed and released for public review in the fourth quarter of FY 2022-2023, concurrent with the completion of the Draft WDRs for Vineyard Operations. 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.

Staff are developing an Initial Study and Environmental Impact Report (EIR), as well as

economic considerations to document the anticipated environmental impacts and the cost of compliance measures related to permit implementation. Based on proposed elements of the permit, an EIR will be conducted as significant potential impacts are foreseen.

The WDRs for Vineyard Operations will apply to vineyards throughout the Region. To receive critical feedback from stakeholders during permit development, staff will hold a series of Technical Advisory Group (TAG) meetings beginning this summer to gather technical input on the administrative draft permit prior to public review. Additionally, staff plan to hold a public workshop on the draft WDRs during the public comment period in the fourth quarter of FY 2022-2023.

Key Issues to Resolve and Considerations: The new cross-program team includes the Division Senior Specialist (Groundwater Specialist), Land Disposal Program staff, and Cannabis Program staff. Each of these team members may work as much as half-time (0.5 PY) on this project, with additional consultation support from the Enforcement Program Senior. The proposed time allocation could affect the ability for team members to accomplish their core duties in their primary programs.

PY Allocation for FY 2022-2023: 0.8 (with additional support from the Enforcement Program Senior). This 0.8 PY allocation represents the total funding allocated toward development of the General WDRs for Vineyard Operations and will be expended by the new cross-program team. As needed, additional resources (up to 0.7 additional PYs) to complete these tasks may be redirected to the cross-program team from the team members' primary program funding sources.

Key Milestones	Target Date
Finalize Administrative Draft WDRs for Vineyard Operations	First Quarter FY 2022-2023
Conduct CEQA Scoping Meeting	First Quarter FY 2022-2023
Continue Stakeholder Outreach / TAG Feedback	July 2022 – April 2023
Conduct Tribal Consultations	July 2022 – April 2023
Release Draft WDRs and EIR for Public Comment	Fourth Quarter FY 2022-2023

1.b – Adoption of Proposed WDRs for Vineyard Operations and Final CEQA Documents

Summary: In the fourth quarter of FY 2022-2023, staff will hold a public workshop on the Draft WDRs for Vineyard Operations. Following the completion of the public comment period in the first quarter of FY 2023-2024 staff will prepare the response to comments documents, process comments on the EIR, and develop the Proposed WDRs for Vineyard Operations and Final EIR for the Regional Water Board's consideration. The adoption hearing is planned for October 2023.

Key Issues to Resolve and Considerations: The proposed time allocation could affect the ability for assigned staff to accomplish their core duties in their primary programs.

PY Allocation for FY 2022-2023: 0.7 (with additional support from the Enforcement Program Senior). This 0.7 PY allocation represents the total funding allocated toward completing the CEQA process and bringing a proposed General WDRs for Vineyard Operations to the Regional Water Board for adoption in October 2023 and will be expended by the new cross-program team. Additional PYs to complete this task in FY 2022-2023 and FY 2023-2024 may be redirected from other regular funding sources to the cross-program team.

Key Milestones	Target Date
Conduct Public Workshop on the Draft WDRs for Vineyard Operations	Fourth Quarter FY 2022-2023
Prepare Response to Comments Document on Draft WDRs for Vineyard Operations	First Quarter FY 2023/2024
Process Comments and Prepare Final EIR	First Quarter FY 2023/2024
First Quarter FY 23/24	First Quarter FY 2023/2024
Regional Water Board Adoption Hearing	Second Quarter FY 2023/2024

1.c – Coordinate with the Watershed Stewardship Team on Implementation and Adaptive Management of the Smith River Plain Water Quality Management Plan (SRPWQMP)

Summary: The Regional Water Board, with input from lily bulb growers, resource agencies, the Tolowa Dee-ni' Nation, and other stakeholders have developed a coordinated approach to control waste discharges from lily bulb agricultural operations under the SRPWQMP. The Executive Officer approved the SRPWQMP in November 2021 following revisions made in response to public comments received in March 2021. The purpose of the SRPWQMP is to undertake an adaptive management project to evaluate the effectiveness of a wide range of best management practices adapted for use in the special environmental setting of the Smith River Plain and unique agricultural practices associated with the lily bulb operations.

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 SRPWQMP is implemented, the team will consider the following information at the annual workgroup meeting to be held in August 2022:

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 SRPWQMP implementation measures, and request follow up measures to address water quality protection needs, as necessary. For FY 2022-2023, 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 2023-2024 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 implication 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 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 2022-2023: 0.10 (with additional support from the Watershed Stewardship Specialist)

Milestones	**Target Date**
Assist farmers in filling out Annual Reports for 2021-2022 growing season	June 2022

Milestones	Target Date
Conduct sampling events in the Smith River Plain	Ongoing
Conduct four inspections of lily bulb operations	June 2023
Run Biotic Ligand Model to compare to historical sample results for dissolved copper	June 2023

1.d – Staff Supervision

Summary: See previous description.

Key Issues to Resolve and Considerations: None

PY Allocation for FY 2022-2023: 0.3

2.a – Statewide Irrigated Lands Program and Reporting

Summary: Groundwater Permitting Unit staff will attend 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 2022-2023: 0.05

9.3 Performance Targets

9.3.1 Reported to State Water Board via ORPP

No performance targets have been identified by ORPP for ILRP.