

# NORTH COAST REGIONAL WATER BOARD

---

## *Point Source & 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*

## FY 2018-2019 WORK PLAN

*Division Chief: Claudia E. Villacorta, P.E.*



## Contents

1.0	BACKGROUND.....	4
1.1	NPDES Wastewater Program .....	4
1.2	NPDES Stormwater Program.....	5
1.3	Waste Discharge to Land Program (Wastewater, Waste Residuals, and Recycled Water) .....	6
1.4	Solid Waste Disposal Program.....	7
1.5	Underground Storage Tank/Site Cleanup/DoD Programs .....	8
1.6	Groundwater Protection Program.....	9
2.0	DIVISION RESOURCES .....	12
2.1	Staffing .....	12
	<b>Table 1 - Division Staff, Includes Management and Support Staff .....</b>	<b>12</b>
3.0	NPDES WASTEWATER PROGRAM .....	13
3.1	Core Activities and Projects by Priority .....	13
	<b>Table 2 - FY 18/19 NPDES Wastewater Program Core Activities and Projects by Priority.</b>	<b>13</b>
3.2	Core Activity and Project Descriptions.....	13
3.3	Performance Targets.....	16
3.3.1	Reported to State Board via ORPP .....	16
4.0	NPDES STORMWATER PROGRAM .....	17
4.1	Core Activities and Projects by Priority.....	17
	<b>Table 3 - FY 18/19 NPDES Stormwater Program Core Activities and Projects by Priority .</b>	<b>17</b>
4.2	Core Activity and Project Descriptions .....	17
4.3	Performance Targets .....	18
4.3.1	Reported to State Board via ORPP .....	18
5.0	WASTE DISCHARGE TO LAND PROGRAM.....	19
5.1	Core Activities and Projects by Priority.....	19
	<b>Table 4 - FY 18/19 Waste Discharge to Land Program Core Activities and Projects by Priority .....</b>	<b>19</b>
5.2	Core Activity and Project Descriptions .....	19
5.3	Performance Targets .....	24
5.3.1	Reported to State Board via ORPP .....	24
6.0	SOLID WASTE DISPOSAL PROGRAM.....	25
6.1	Core Activities and Projects by Priority.....	25

**Table 5 - FY 18/19 Solid Waste Disposal Program Core Activities and Projects by Priority** .....25

6.2 Core Activity and Project Descriptions .....25

6.3 Performance Targets .....27

6.3.1 Reported to State Board via ORPP .....27

7.0 UST/SITE CLEANUP/DoD PROGRAMS.....28

7.1 Core Activities .....28

**Table 6 - FY 18/19 Program Core Activities and Projects by Priority** .....28

7.2 Core Activity and Project Descriptions .....28

7.3 Performance Targets .....31

7.3.1 Reported to State Board via ORPP .....31

8.0 GROUNDWATER PROTECTION PROGRAM .....32

8.1 Core Activities and Projects by Priority.....32

**Table 7 - Groundwater Protection Strategy**.....32

8.2 Core Activity and Project Descriptions .....32

8.3 Performance Targets .....37

8.3.1 Reported to State Board via ORPP .....37

**Cover Photos:** From top left to right clockwise: City of Fort Bragg Wastewater Treatment Facility, City of Arcata Wastewater Treatment Wetland, Underground Storage Tank Site and Construction Stormwater Site.

## 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 storm water, it may be regulated under the NPDES Storm Water program.

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

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

There are forty (40) 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.

<b>Number of NPDES Permits by Type</b>			
Municipal	Industrial	College	Fish Hatcheries
26	6	3	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 forty-two (42) facilities regulated under general NPDES permits in the North Coast Region.

<b>General NPDES Permit</b>	<b>Number of Active Enrollees</b>
General Order for Low Threat Discharges (R1-2015-0003)	3
General Order for Treated Groundwater Petroleum Hydrocarbon & Volatile Organic Compound (R1-2016-0034)	3
Statewide General Order Pesticide Aquatic Invasive Species (2011-0003-DWQ)	0
Statewide General Order Pesticide Spray Application (2011-0004-DWQ)	0
Statewide General Order Pesticide Vector Control (2011-0002-DWQ)	1
Statewide General Order Pesticide Weed Control (2013-0002-DWQ)	6
Statewide General Order Utility Vaults (2014-0174-DWQ)	6
Statewide General Order Drinking Water System Discharges (2014-0194-DWQ)	23

## 1.2 NPDES Stormwater Program

The Federal Clean Water Act (Clean Water Act) prohibits certain discharges of storm water containing pollutants except in compliance with a NPDES permit. The NPDES stormwater program regulates some stormwater discharges from three potential sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

### 1.2.1 Municipal Stormwater Program

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water 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, 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.

#### *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 campuses, prison and hospital complexes. The Phase II Small MS4 General Permit covers Phase II permittees statewide. On February 5, 2013 the Phase II Small MS4 General Permit was re-adopted (Order 2013-0001-DWQ) and the new requirements became effective on July 1, 2013.

#### *Caltrans Permit Program*

The State Water Board issued the Caltrans Permit, which regulates all 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, and is subject to the permitting requirements of Clean Water Act section 402(p). Caltrans' discharges consist of storm water and non-storm water discharges from State owned rights-of-way. A Caltrans contract liaison housed in the Nonpoint Source & Surface Water Protection Division is responsible for overseeing

#### 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 249 active sites enrolled under the Construction Stormwater General Permit.

#### 1.2.3 Industrial Stormwater Program

Industrial storm water discharges and authorized non-storm water 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 471 active facilities currently enrolled under the Industrial Stormwater General Permit.

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

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 conditional 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, which may be used to regulate those discharges that have the lowest threat to water quality.

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

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

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

#### **1.4 Solid Waste Disposal Program**

The Solid Waste Land Disposal Program regulates the discharge to land of certain solid and liquid wastes. These wastes include municipal solid waste (MSW), hazardous wastes, designated wastes, and 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 regulations applicable to these discharges are found in Title 27, for nonhazardous wastes, or Chapter 15 of Title 23, for hazardous wastes, of the California Code of Regulations. These regulations prescribe standards for waste containment, monitoring, and closure 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.

Statewide mandates in the 1990s for local solid waste management agencies to meet waste diversion targets resulted in the closure of locally-owned and operated landfills throughout the North Coast Region. Closure of the county landfills left the region with only one operating municipal solid waste disposal site (SWDS): the Sonoma County Central Landfill, located in Cotati. Consequently, the complicated and resource intensive process for permitting new solid waste management units (WMUs) is limited to current and future projects at the Sonoma County Central SWDS. However, Staff oversight of the remaining WMUs, which include wood waste disposal sites, land treatment units, and MSW landfills

that have not completed the final closure process, is ongoing. For these facilities, Land Disposal staff conducts routine site inspections, reviews self-monitoring and other technical reports, reviews and revises monitoring and reporting programs, and prepares closure permits, when local conditions allow and in accordance with Land Disposal Program priorities.

When final closure of an existing WMU is proposed, Title 27 requires the preparation of a Construction Quality Assurance Plan (CQA Plan). The purpose of the CQA Plan is to assure that the WMU is constructed in accordance with design and regulatory requirements. The CQA Plan specifies construction procedures, observation, sampling, testing, acceptance criteria, surveying and documentation requirements for each material utilized in construction of landfill components. Typical landfill components include foundations, liners, leachate drainage, collection, and storage systems, final cover systems, surface water control systems, and landfill gas control systems. Daily records are maintained to summarize ongoing construction, observations, test results, material nonconformance reports, and changes to design and technical specifications. Regional Water Board staff reviews and approves the detailed CQA Plans prior to commencement of construction and reviews the daily reports for the duration of the construction project.

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 (9)
- Land Treatment Units (1)
- Active Mines (2)
- Inactive or Abandoned Mines, not currently regulated under WDRs (45)
- Surface impoundments (0)
- Waste piles (1)

### **1.5 Underground Storage Tank/Site Cleanup/DoD Programs**

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

The Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of 'non-federally owned or used' sites where recent or historical unauthorized releases of



pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, industrial manufacturing and maintenance sites, dry cleaners, lumber mills and bulk fueling facilities. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are diverse and include solvents, pesticides, heavy metals, and fuel constituents.

The Department of Defense (DoD) Cleanup program only include 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 have to 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.

We currently have 157 open UST program sites, 255 SCP sites, and approximately 15 DoD program sites (with multiple sub-sites at some formerly used defense sites).

## **1.6 Groundwater Protection Program**

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

A priority project identified by the Triennial Review of the Basin Plan and the Groundwater Strategic Team is the development of a groundwater protection policy. This project began on the Triennial review in 2007 as a comprehensive Basin Plan amendment that included revisions to chapter 3 (water quality objectives) and chapter 4 (implementation plans). 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. During the adoption of the 2014 Triennial Review of the Basin Plan in March 2015, the Board identified Phase II as priority No. 5<sup>1</sup>.

In 2015, the Regional Water Board staff formed the Groundwater Strategic Team to support efforts in groundwater resources preservation, protection, and remediation. The Groundwater Strategic Team expanded the vision of the groundwater protection policy beyond the basin plan amendment project as described in the 2014 Triennial Review to include other regulatory and non-regulatory elements. To capture these other regulatory and non-regulatory elements, the project was renamed as the North Coast Groundwater Protection Strategy. The strategy is intended to prioritize, coordinate, and implement Regional Water Board tools<sup>2</sup> and statewide tools<sup>3</sup> for the protection of groundwater quality on a basin wide scale with the goal of protecting ecosystem function and advancing the human right to clean water under current and future climatic conditions. The strategy includes the following five components:

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

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

1. *Basin Plan Amendments and Order Renewals*: Develop the Phase II Basin Plan amendment which involves development of a groundwater protection policy. Continue to update and renew orders that are protective of groundwater resources.
2. *Basin Scale Groundwater Assessments*: Develop the procedures required to assess, characterize and determine the condition of and risk to groundwater quality at basin/aquifer scale.
3. *Sustainable Groundwater Management Act (SGMA)*: In coordination with State Water Board and California Department of Water Resources, provide the local Groundwater

---

<sup>1</sup> Triennial Review Project No. 5 includes the development of a groundwater protection policy, policy to promote groundwater recharge, programmatic approach to managing salts and nutrients in groundwater and the update of Table 2-1 to include beneficial uses for individual groundwater basins, where appropriate.

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

<sup>3</sup> Local and statewide activities of importance include: DWR's groundwater management planning; SWRCB's salt and nutrient management planning under the Recycled Water Policy; groundwater-surface interaction assessments; and statewide efforts to update groundwater monitoring protocols, data assessment and presentation tools.

Sustainability Agencies in the North Coast Region with water quality data, assessment tools, and water quality standards as they develop Groundwater Sustainability Plans.

4. *Periodic Meetings and Presentations:* The Groundwater Team meets periodically to hear presentations from Water Board staff, outside agencies, vendors, or consultants regarding water supply, groundwater protection, and/or groundwater cleanup issues. These meetings are a good opportunity to make contacts with other agencies and learn more about their interests/priorities regarding groundwater issues in the region.
5. *Statewide Policy Development:* Participate in State Water Board and other relevant policy or legislative developments to promote our unique perspective on the protection of high quality waters in the North Coast Region.
6. *Groundwater/Surface Water Interaction:* Develop strategies for integrating groundwater concerns into the management of watersheds, and vice versa.

## 2.0 DIVISION RESOURCES

### 2.1 Staffing

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

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

**Table 1 - Division Staff, Includes Management and Support Staff**

<i>Position</i>	<i>Name</i>	<i>Division or Unit</i>	<i>PYs</i>
Division Chief	Claudia Villacorta	Point Source & Groundwater Protection	1.0
Specialist	Jeremiah Puget	Point Source & Groundwater Protection	1.0
Senior	Vacant	NPDES Unit	1.0
Technical	5.7 Staff (+1 vacancy) <sup>4</sup>	NPDES Unit	6.7
Senior	Charles Reed	Groundwater Permitting Unit	1.0
Technical	4 Staff	Groundwater Permitting Unit	4.0
Senior	Craig Hunt	Site Cleanup Unit	1.0
Technical	6 Staff (+1 vacancy)	Site Cleanup Unit	7.0
Admin Support Staff	6 Staff <sup>5</sup>	Administration	1.25
Scientific Aid	2 (vacant) <sup>6</sup>	Point Source & Groundwater Protection	
<b>Total:</b>			<b>23.95</b>

<sup>4</sup> 0.7 PY under NPDES Unit does work supporting Groundwater Permitting Unit efforts.

<sup>5</sup> 1.25 PY of administrative support staff are included here to identify officewide analytical and administrative support but are not included below in Core Activities or Special Projects.

<sup>6</sup> The Scientific Aid positions are not added to the total PYs; although these positions support Division core activities when filled, these are part-time positions that are not always available to provide such support.

### 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.

**Table 2 – FY 18/19 NPDES Wastewater Program Core Activities and Projects by Priority**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. Prepare individual NPDES permits for new unpermitted facilities and new enrollments under General NPDES permits.	Core	On-going
	b. Renew existing individual NPDES permits for both major and minor wastewater facilities.	Core	On-going
	c. Conduct inspections for both major and minor wastewater facilities to ensure compliance with individual permit requirements.	Core	On-going
	d. Draft and finalize compliance reports based on inspection findings.	Core	On-going
	e. Prepare formal and informal enforcement actions to address permit violations.	Core	On-going
	f. Review and comment on various individual permit deliverables.	Core	On-going
	g. Review and comment on various enforcement order related deliverables.	Core	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

**Summary:** As permit applications are received, NPDES staff prioritizes and reviews 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 2018-19, Staff plan to prepare one draft individual NPDES permit for Board consideration and adoption and an undetermined number of new enrollments under general NPDES permits. The number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and competing work priorities.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.2

New NPDES Permits or Enrollments	Target Date (by FY Quarter)
<i>Town of Samoa Community Services District                      WWTP NPDES Permit Adoption</i>	<i>Q4</i>



<b>General NPDES Permit Enrollments</b>	<i>Ongoing</i>
---	----------------

**1.b - Renew existing individual NPDES permits**

**Summary:** NPDES permits are renewed every five years. Based on a review of the region’s existing NPDES permits, the NPDES Unit staff plans to renew a total of ten (10) individual NPDES permits during FY 2018-19 (for 5 minor facilities and 5 major facilities). Staff also plan to draft permits during FY 2018-19 which will be adopted in the first quarter of FY 2019-20. Updates are anticipated for the following facilities:

NPDES Permit Renewal	Target Date (by FY 2018-19 Quarter)
<i>City of Forestville WWTP (Minor)</i>	<i>Q1</i>
<i>DG Fairhaven Power Plant (Minor)</i>	<i>Q1</i>
<i>City of Ukiah WWTP (Major)</i>	<i>Q1</i>
<i>City of Cloverdale WWTP (Major)</i>	<i>Q1</i>
<i>McKinleyville Services District WWTP (Major)</i>	<i>Q1</i>
<i>City of Ferndale WWTP (Minor)</i>	<i>Q2</i>
<i>City of Fort Bragg WWTP (Major)</i>	<i>Q2</i>
<i>Arcata Community Services District WWTP (Major)</i>	<i>Q3</i>
<i>UC Davis Bodega Marine Laboratory (Minor)</i>	<i>Q3</i>
<i>Humboldt State University Telonicher Marine Laboratory (Minor)</i>	<i>Q4</i>
<i>Russian River Community Services District WWTP (Minor)</i>	<i>Q1 (FY 2019-20)</i>
<i>Scotia Community Services District WWTP (Minor)</i>	<i>Q1 (FY 2019-20)</i>
<i>Town of Windsor WWTP (Major)</i>	<i>Q1 (FY 2019-20)</i>
<i>City of Santa Rosa WWTP (Major)</i>	<i>Q1 (FY 2019-20)</i>

**Key Issues to Resolve:** Due to reduced in-kind contractor support for NPDES permit development, competing priorities, and emerging permit issues, NPDES permit renewals will be subject to delays. Also, NPDES permit renewals that authorize the production and use of Recycled Water may experience delays due to the need for the Permittee to prepare and obtain approval from the State Water Board’s Division of Drinking Water of a Title 22 Engineering Report.

Currently, the State Water Board, in consultation with Regional Water Boards, works with U.S. EPA to establish an annual process for in-kind contract support for draft NPDES permit development. Funding levels have been relatively consistent over the last few years and reduced contractor support funds have been secured for FY 2018-19. Future funding levels for U.S. EPA contractor support are uncertain and likely to be phased out by FY 2019-20. Contingency budget planning will need to occur for permits that will be reissued in 2020. In addition to permit development, U.S. EPA would like to empower Regional and State Water Board staff to respond to pretreatment inquiries. Historically, U.S. EPA has responded directly to inquiries from industries and pretreatment programs within California, coordinating with Regional Water Boards on responses. U.S. EPA has been providing annual pretreatment training to State and Regional Water Board staff. EPA is now asking Regional Water Boards (and State Water Board, as appropriate) to begin responding directly on pretreatment inquiries. U.S.EPA will still act as a technical pretreatment resource for any questions or assistance when responding to inquiries. However, Regional Water Boards will be asked to identify a staff person to become an expert and respond to

future pretreatment inquiries. State Water Board is working to identify additional resources to provide permit development support to the regions.

**PY Allocation for FY 18/19:** 1.0

**1.c and d- Conduct inspections of major and minor wastewater facilities and prepare compliance reports for facilities listed below.**

**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 Boards-US EPA Memorandum of Agreement 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 table below indicates proposed inspections for nine (9) major and seven (7) minor facilities for FY 2018-19.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.8 PY

<b>Facility Inspection</b>	<b>Target Date (by FY 2018-19 Quarter)</b>
<i>City of Santa Rosa WWTP (Major)</i>	<i>Q1</i>
<i>Russian River CSD WWTP (Minor)</i>	<i>Q1</i>
<i>City of Arcata WWTP (Major)</i>	<i>Q1</i>
<i>MckKinleyville WWTP (Major)</i>	<i>Q1</i>
<i>City of Fortuna WWTP (Major)</i>	<i>Q2</i>
<i>City of Willits WWTP (Major)</i>	<i>Q2</i>
<i>Mendocino County Water Works (Anchor Bay) WWTP (Minor)</i>	<i>Q2</i>
<i>College of the Redwoods (Minor)</i>	<i>Q2</i>
<i>UC Davis Bodega Bay Marine Laboratory (Minor)</i>	<i>Q2</i>
<i>Shelter Cove WWTP (Minor)</i>	<i>Q2</i>
<i>Humboldt Creamery Facility (Minor)</i>	<i>Q2</i>
<i>City of Eureka WWTP (Major)</i>	<i>Q3</i>
<i>Redway CSD (Minor)</i>	<i>Q3</i>
<i>City of Forestville WWTP (Minor)</i>	<i>Q3</i>
<i>Crescent City WWTP (Major)</i>	<i>Q3</i>
<i>City of Ukiah (Major)</i>	<i>Q3</i>
<i>City of Fort Bragg WWTP (Major)</i>	<i>Q4</i>
<i>Mendocino City CSD WWTP (Minor)</i>	<i>Q4</i>

**1.e- Prepare formal and informal enforcement actions to address identified violations**

**Summary:** Core activity

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.5 PY

**1.f and g- Review and comment on permit and enforcement order deliverables**

**Summary:** Core activity: On-going

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.5 PY

### 3.3 Performance Targets

#### 3.3.1 Reported to State Board via ORPP

The Performance Target for the NPDES Wastewater program that is reported to the State Water Board is based on the number of major and minor wastewater facilities inspected and major and minor individual permits renewed. The following table shows our targets for FY 18/19.

*Table 6 - Performance Targets proposed for FY 18/19*

<b># of NPDES Wastewater Major Facilities Inspected</b>	<b>9</b>
<b># of NPDES Wastewater Major Facility Individual Permits Renewed</b>	<b>2</b>
<b># of NPDES Wastewater Minor Facility Individual Permits Renewed</b>	<b>7</b>
<b># of NPDES Wastewater Minor Individual Facilities Inspected</b>	<b>3</b>

## 4.0 NPDES STORMWATER 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.

**Table 3 – FY 18/19 NPDES Stormwater Program Core Activities and Projects by Priority**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. Conduct site/facility inspections to determine and ensure compliance with the Industrial Stormwater General Permit, the Construction Stormwater General Permit, and MS4 Phase I and Phase II Permit requirements. Develop criteria to prioritize inspections.	Core	On-going
	b. Draft and finalize compliance reports based on inspection findings.	Core	On-going
	c. Prepare formal and informal enforcement actions to address permit violations.	Core	On-going
	d. Review and comment on various enforcement order related deliverables.	Core	On-going
	e. Review and comment on various MS4 Phase I permit deliverables such as workplans and studies.	Core	On-going
	f. Coordinate with MS4 permittees at meetings to provide compliance assistance, clarification of permit requirements, conduct educational outreach of other Regional Water Board programs, and inspection and enforcement coordination.	Core	On-going
2	a. Review and approve Change of Information and Notice of Termination requests submitted by Industrial Stormwater General Permit and Construction Stormwater General Permit enrollees.	Core	On-going
	b. Review, comment and approve Stormwater Pollution Prevention Plans (SWPPPs), Notices of Non-Exposure Certification, Notices of Non-Applicability, and Notices of Intent seeking coverage under the Industrial and Construction Stormwater General Permits.	Core	On-going
	c. Review and comment on annual reports submitted by enrollees under the MS4 Phase I Permit and the Industrial Stormwater General Permit.	Core	On-going
	d. Coordinate with MS4s Permittees and State Water Board staff on Trash Amendment implementation, including providing feedback on proposed alternative trash priority land use areas, providing compliance assistance, acting as an intermediary between the co-permittees and State Water Board staff, and helping to determine proper trash monitoring protocol and reduction targets.	Core	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 and b- Conduct site inspections and prepare compliance reports (on-going); develop prioritization criteria for inspections (Q1).**

**Summary:** Core activity: On-going and Q1  
**Key Issues to Resolve:** None  
**PY Allocation for FY 18/19:** 1.25 PY

**1.c - Prepare enforcement actions to address violations**

**Summary:** Core activity: On-going  
**Key Issues to Resolve:** None  
**PY Allocation for FY 18/19:** 0.75 PY

**1.d and e - Review and comment on various permit and enforcement order deliverables**

**Summary:** Core activity: On-going  
**Key Issues to Resolve:** None  
**PY Allocation for FY 18/19:** 0.25 PY

**1.f and 2.d - Coordinate with MS4 permittees and State Water Board Staff to provide compliance assistance and assist with Trash Amendment implementation**

**Summary:** Core activity: On-going  
**Key Issues to Resolve:** None  
**PY Allocation for FY 18/19:** 0.25 PY

**2.a, b. and c. - Review and approve various permittee requests, including SWPPPs and notices of intents; review annual reports.**

**Summary:** Core activity: On-going  
**Key Issues to Resolve:** None  
**PY Allocation for FY 18/19:** 0.5 PY

**4.3 Performance Targets**

**4.3.1 Reported to State Board via ORPP**

Fiscal Year	Target Municipal Phase I/II Inspections	Target Construction Inspections	Target Industrial Inspections
2018-2019	4	40	40



## 5.0 WASTE DISCHARGE TO LAND PROGRAM

### 5.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 4. Some are described in detail in Section 5.2.

**Table 4 – FY 18/19 Waste Discharge to Land Program Core Activities and Projects by Priority**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. Prepare Revised WDRs and Rescission Orders for existing Facilities	Core	Ongoing
	b. Prepare New WDRs and General WDR Enrollments	Core	Ongoing
	c. Provide technical and compliance assistance to Disadvantaged Communities	Special	Ongoing
	d. Conduct stakeholder outreach for Russian River Watershed Pathogen TMDL Early Implementation	Special	Ongoing
	e. Review/Approve Local Agency Management Programs	Special	Ongoing
2	a. Review Self-Monitoring Reports and Conduct Follow up	Core	Ongoing
	b. Respond to complaints and emerging Facility issues	Core	Ongoing
	c. Conduct Facility inspections and prepare inspection reports	Core	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 2 above.

#### 1.a Prepare New WDRs and GWDRs Enrollments

**Summary:** As permit applications are received, Groundwater Permitting staff prioritizes and reviews applications, notifies the applicants of the completeness of the applications, works with applicants to obtain required information, and prepares waste discharge requirements based on complete applications. In FY 2018-19, Staff plans to prepare one draft individual WDR for Board consideration and adoption and an undetermined number of new enrollments under general WDRs. The number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and competing work priorities.

Compared to individual WDRs, general WDRs have more streamlined monitoring and reporting requirements and are routinely updated, reducing the long-term case management burden on Unit staff.

**Key Issues to Resolve:** Cal/EPA's Bill of Rights for Environmental Permit Applicants states that agencies must notify permit applicants within 30 days of receipt of applications of any deficiencies

or determine that the application is complete. Due to limited staff resources, Groundwater Permitting staff has been unable to meet this standard.

**PY Allocation for FY 18/19:** 0.35 PY

<b>New WDR Order Issuance</b>	<b>Target Date (by FY Quarter)</b>
<i>Lewiston Community Services District WWTP Adoption (New Permit)</i>	<i>Q4</i>
<i>General WDR Order Enrollments</i>	<i>Ongoing</i>

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

**Summary:** Unlike NPDES permit, which are renewed every five years, non-NPDES WDRs continue in force until they are rescinded or revised. Non-NPDES WDRs are periodically reviewed every five, ten, or fifteen years, based on the regulated discharge’s Threat to Water Quality and Complexity (TTWQ/CPLX) rating, to reaffirm the adequacy of the WDRs and to determine whether the WDRs should be revised to incorporate new regulatory or policy changes that have occurred since the WDRs were originally adopted or last reviewed. Based on a review of the region’s existing WDRs, the Groundwater Permitting staff plans to update eight individual WDRs during FY 2018-19.

Updates are anticipated for the following facilities:

<b>Existing WDR Order Revision</b>	<b>Target Date (by FY Quarter)</b>
<i>Garberville Sanitary District WWTP</i>	<i>Q1</i>
<i>Bodega Bay Public Utility District WWTP</i>	<i>Q3</i>
<i>Weott Sanitary District WWTP</i>	<i>Q3</i>
<i>Miranda Sanitary District WWTP</i>	<i>Q3</i>
<i>Roseburg Forest Products Weed Veneer Plant</i>	<i>Q4</i>
<i>Vintners Inn WWTP</i>	<i>Q4</i>
<i>City of Point Arena WWTP</i>	<i>Q4</i>
<i>Airport-Larkfield Wikiup Sanitation District WWTP</i>	<i>Q1 (FY 2019-20)</i>

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 under local agency oversight for OWTS with wastewater flows under 10,000 gallons per day. 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 approximately four rescission orders during FY 2018-19.

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

**PY Allocation for FY 18/19:** 0.8 PYs

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

**Summary:** The Land Disposal and Groundwater Permitting Unit will continue efforts from FY 2017-18 by providing technical and compliance assistance to disadvantaged communities (DACs) to advance the Human Right to Water and to improve access to public funding for wastewater treatment and disposal projects. As of July 1, 2018, Unit staff is currently assisting over 25 local agencies that have applied for public funding assistance through the California Clean Water State Revolving Fund (Small Community Grant Program).

Also expected in FY 2018-19 is early implementation activities for the Russian River Watershed Pathogen TMDL, work that includes public outreach to owners of onsite wastewater treatment system (OWTS) in the lower Russian River area and coordination with local agencies and other stakeholders identified as implementing entities in the TMDL Action Plan. After adoption of the Russian River Watershed Pathogen TMDL, which is anticipated in November 2018, 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 over 36,000 parcels in the Watershed during the first phase of the Program. Implementation of this program is expected to require significant staff resources during FY 2018-19 and for the coming years.

**Key Issues to Resolve:** Currently, the Unit Supervisor, Division Chief, and one technical staff are allocating time to these high priority tasks instead of other core activities such as inspections, SMR review, and WDR reissuance. The commitment of staff time for these Special Projects, diverting resources from core activities, is unsustainable. Regional Water Board staff is seeking funding for additional staff resources to manage these special projects in order to refocus existing staff work toward completing core activities. If additional funding is not secured, progress in these priority activities will be compromised.

**PY Allocation for FY 18/19:** 1.7 PYs (1 PY for technical and compliance assistance to DACs and 0.7 PYs for Russian River TMDL implementation)

### **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 2018-19, only Humboldt County is implementing an approved LAMP. A public hearing for the Board to consider approval of a LAMP for the County of Mendocino is scheduled for November 2018. The County of Sonoma is revising its draft LAMP and submitting it for Regional Water Board approval during FY 2018-19. Groundwater Permitting staff anticipates ongoing work with Sonoma County staff to finalize the draft LAMP and prepare the Regional Water Board resolution approving the LAMP.

As of September 1, 2018, the Counties of Del Norte, Siskiyou, and Trinity have not submitted draft LAMPs to the Regional Water Board for approval. However, County staff from each of these counties has expressed an interest or intent to submit draft LAMPs for Regional Water Board staff review. It is expected that some of these draft LAMPs will be submitted in FY 2018-19. While it is unlikely that the Regional Water Board staff's LAMP review process for these counties will be completed so that the draft LAMPs will be approved by the Regional Water Board in FY 2018-19, Groundwater Permitting Unit staff anticipate ongoing work with staff of these counties to develop and finalize their draft LAMPs.

Approval of LAMPs for Modoc, Lake, and Glenn Counties is designated to the Central Valley Regional Water Board. Approval of the LAMP for Marin County is designated to the San Francisco Bay Regional Water Board.

**Key Issues to Resolve:** The Counties of Del Norte, Siskiyou, and Trinity have limited staff resources for preparing a LAMP. 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 18/19:** 0.2 PYs

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

**Summary:** Regulated facilities prepare and submit self-monitoring reports (SMRs) to document their facility's compliance with waste discharge requirements each month or quarterly in accordance with the facility's monitoring and reporting program. Most facilities also submit an annual report that summarizes the preceding year's monitoring data and compliance status. Groundwater Permitting Unit staff review SMRs to determine compliance with waste discharge requirements. Staff follow up may be required to address missing, unclear information, or other reporting problems. Groundwater Permitting Unit staff have committed to review 40 SMRs in FY 2018-19, focusing on facilities whose compliance history has been inconsistent.

**Key Issues to Resolve:** 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.

**PY Allocation for FY 18/19:** 0.2 PYs

### 2. b – Respond to Complaints and Emerging Facility issues

**Summary:** Groundwater Permitting Unit staff receive 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. In many cases, these reports are referred by Unit staff to the appropriate local enforcement agency for follow up, in other case, Unit staff may respond to the complaint with a site inspection. Groundwater Permitting Unit staff anticipate conducting approximately three complaint inspections in FY 2018-19 (tracked as "other inspections" under performance targets for this program).

Groundwater Permitting Unit staff also 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.

**Key Issues to Resolve:** Due to limited Groundwater Permitting staff resources and competing priorities, complaint response and facility "case handling" has declined in recent years. Additional staff resources would improve Unit staff's ability to provide timely response to public complaints/concerns and provide case handling services to regulated facilities.

**PY Allocation for FY 18/19:** 0.1 PYs

**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 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. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, Groundwater Permitting Unit staff try to visit each municipal wastewater treatment facility permitted facility every 3-4 years, or more frequently for facilities higher TTWQ/Complexity ratings. Other regulated facilities, such as wineries, campgrounds, and mobile home parks, are inspected on a much less frequent basis. The table below indicates the proposed 32 inspections for FY 2018-19. Not included in this list are winery inspections which will be conducted as identified and as resources and time allows.

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

**PY Allocation for FY 18/19:** 0.2 PYs

<b>Municipal Facility Inspection</b>	<b>Target Date (by FY 2018-19 Quarter)</b>
<i>Rohnert Park Water Reclamation System</i>	<i>Q1</i>
<i>Airport-Larkfield Wikiup WWTF</i>	<i>Q1</i>
<i>Smith River Rancheria WWTP</i>	<i>Q1</i>
<i>Ship Ashore WWTP</i>	<i>Q1</i>
<i>Lewiston CSD WWTP</i>	<i>Q1</i>
<i>Trinity County Waterworks District #1 WWTP</i>	<i>Q1</i>
<i>Gualala CSD WWTP</i>	<i>Q2</i>
<i>US Coast Guard Petaluma Two Rock WWTF</i>	<i>Q2</i>
<i>Bodega Bay PUD WWTF</i>	<i>Q2</i>
<i>Weaverville SD WWTP</i>	<i>Q2</i>
<i>City of Blue Lake WWTP</i>	<i>Q2</i>
<i>Samoa Townsite WWTP</i>	<i>Q2</i>
<i>Garberville SD WWTP</i>	<i>Q2</i>
<i>Weott WWTP</i>	<i>Q2</i>
<i>Miranda WWTP</i>	<i>Q2</i>
<i>Westport WWTP</i>	<i>Q2</i>
<i>Caspar South Water District WWTP</i>	<i>Q2</i>
<i>City of Weed WWTP</i>	<i>Q3</i>
<i>City of Dorris WWTP</i>	<i>Q3</i>
<i>City of Ukiah WWTP Recycled Water System</i>	<i>Q3</i>
<i>Macdoel WWTP</i>	<i>Q3</i>
<i>Caltrans Collier Rest Area WWTP</i>	<i>Q3</i>
<i>Oceana Marin WWTP</i>	<i>Q3</i>
<i>Tulelake WWTP</i>	<i>Q3</i>



<i>Geyserville Sanitation Zone WWTP</i>	<i>Q3</i>
<i>JH Ranch WWTP</i>	<i>Q4</i>
<i>City of Montague WWTP</i>	<i>Q4</i>
<i>City of Yreka WWTP</i>	<i>Q4</i>
<i>Happy Camp WWTP</i>	<i>Q4</i>
<i>Hopland PUD WWTP</i>	<i>Q4</i>
<i>Calpella WD WWTP</i>	<i>Q4</i>
<i>USACOE Lake Mendocino WWTP</i>	<i>Q4</i>

### 5.3 Performance Targets

#### 5.3.1 Reported to State Board via ORPP

Fiscal Year	Target Tasks					
	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
2018-19	4	20	9	27	3	40

## 6.0 SOLID WASTE DISPOSAL PROGRAM

### 6.1 Core Activities and Projects by Priority

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 18/19 Solid Waste Disposal Program Core Activities and Projects by Priority**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. Adopt Final Closure WDRs for Mendocino County South Coast SWDS	Core	March 2019
	b. Enroll Composting Operations under GWDRs	Core	January 2019
	c. Request and Review Reports to draft New Closure WDRs	Special	June 2019
	d. Conduct facility oversight and case handling	Core	Ongoing
	e. Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site	Core	June 2019
2	a. Review facility Financial Assurance documents	Core	Ongoing
	b. Update Monitoring and Reporting Programs	Core	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 – Adopt Final Closure WDRs for Mendocino County South Coast SWDS

**Summary:** Land Disposal Staff is reviewing design documents and preparing WDRs for final closure of the Mendocino County South Coast Solid Waste Disposal Site, The South Coast Solid Waste Disposal Site, located in Caspar, is no longer receiving municipal solid waste and the existing waste management unit is protected by an interim cover. The County has proposed an engineered alternative cover design (artificial turf) that is new to the North Coast Region. Regional Water Board staff work includes review of daily reports prepared in accordance with the approved Construction Quality Assurance (CQA) Plan.

**Key Issues to Resolve:** Land Disposal staff is in discussions with County staff to resolve drainage issues related to the final design.

**PY Allocation for FY 18/19:** 0.5 PY

Milestones	Target Date (by FY Quarter)
<i>Preparation and Adoption of Mendocino County Solid Waste Disposal Site Final Closure WDRs</i>	<i>Q3</i>

**1.b – Enroll Composting Operation Under GWDRs**

**Summary:** Land Disposal staff is reviewing Notices of Intent and technical reports for five composting operations located in the North Coast Region that are required to obtain coverage under the statewide General WDRs for Composting Operations (Order WQ 2015-0121-DWQ). Staff plans to complete all reviews and issue notices of coverage by the end of the 2018 calendar year.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.5 PY

Milestones	Target Date (by FY Quarter)
<i>Enroll Composting Operation Under GWDRs</i>	<i>Q3</i>

**1.c – Request and Review Reports to draft New Closure WDRs**

**Summary:** Final closure of a waste management unit is a multi-year project involving coordination between the Discharger, the Discharger’s design and construction management team, CalRecycle and other local and state agencies, planners and other consultants involved in the environmental review, and the public. A successful and expeditious landfill closure project requires an ongoing commitment of Regional Water Board staff resources from the initial project concept phase through construction and oversight of post-closure maintenance. Early Staff involvement in the process is critical.

In FY 2018-19, Land Disposal Program staff will continue to coordination activities toward completion of final closure of the City of Ukiah’s SWDS, which is tentatively scheduled for construction in FY 2019-20. Also in FY 2018-19, Staff also anticipates receipt of a proposal for final closure of a wood ash disposal site near Scotia, Tank Gulch SWDS, which currently owned by Humboldt Redwood Company (HRC) and operated as an unclassified “Waste Pile.”

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.4 PY

Milestones	Target Date (by FY Quarter)
<i>City of Ukiah SWDS</i>	<i>Q4</i>
<i>HRC Tank Gulch SWDS</i>	<i>Q4</i>

**1.d – Conduct Facility Oversight and Case Handling**

**Summary:** Land Disposal 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 remerging issues at regulated facilities. Land Disposal staff has tentatively scheduled 15 compliance inspections for FY 2018-19. Other oversight activities are unpredictable and therefore, unscheduled.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.3 PY

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

**Summary:** Land Disposal Staff is reviewing design documents and preparing WDRs for construction of new waste management units at the Sonoma County Central SWDS.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.2 PY

Milestones	Target Date (by FY Quarter)
<i>Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site</i>	<i>Q4</i>

**2.a – Review facility Financial Assurance documents**

**Summary:** All owners/operators of municipal SWDS are required to demonstrate that they will be able to pay for the required closure and post-closure care activities, and any corrective action that might become necessary due to releases of contaminants into the surrounding environment. Financial assurance documents are written, site-specific estimates that are prepared prior to commencement of landfill operations and must be adjusted annually during the active life of the waste management unit to account for inflation. Corrective action cost estimates are prepared when a release is detected and also must be adjusted annually during the period of the correction action. Annual updates to financial assurance documents are reviewed each year by the Regional Water Board Land Disposal staff for waste management units regulated under WDRs.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.2 PY

**2.b – Update Monitoring and Reporting Programs**

**Summary:** Land Disposal Staff Update Monitoring and Reporting Program: Mendocino County Laytonville Solid Waste Disposal Site, Klamath (Green Diamond) Wood Waste Disposal Site (WWDS), Sonoma County Annapolis Solid Waste Disposal Site.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.1 PY

Milestones	Target Date (by FY Quarter)
<i>Laytonville SWDS</i>	<i>Q1</i>
<i>Klamath (Green Diamond) WWDS</i>	<i>Q3</i>
<i>Sonoma County Annapolis</i>	<i>Q3</i>

**6.3 Performance Targets**

**6.3.1 Reported to State Board via ORPP**

Fiscal Year	Target Tasks					
	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2018-19	2	5	3	15	16	7

## 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 2. Some are described in detail in Section 7.2.

**Table 6 – FY 18/19 UST/Site Cleanup/DoD Programs Core Activities and Projects by Priority**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. UnderGround Storage Tank Cleanup Program	Core	Ongoing
	b. Site Cleanup Program.	Core	Ongoing
	c. Department of Defense Cleanup Program.	Core	Ongoing
	d. Spill Response	Core	Ongoing
	e. Respond to public inquiries on closed cases or no-case property evaluations.	Core	Ongoing

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

### 7.2 Core Activity and Project Descriptions

The main 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. 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 certain case load (can be around 50 cases/sites).

The core activities are generally the same for each of the three programs. Staff review and respond to reports, investigation plans, and remediation plans; send directive letters; manage records; interact with the responsible parties, their representatives and consultants, and interested third parties regarding the on-going work; and perform site inspections. Sometimes for a case, staff prepare and issue enforcement actions.

Some cases in each program are stalled, and no work on the site is proceeding. Cleanup staff review these to determine the reason for the stall and take various actions to move the case forward again. Enforcement is one tool for this, but sometimes the properties have changed hands or responsible parties are no longer available and staff have to 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, we help investigate other funding possibilities.

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



## Case Work Prioritization

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

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

### 1.a - 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 US EPA rules requiring the installation of upgraded UST systems in the 1990s, most active USTs were replaced then. When old USTs were removed from the ground, contamination was frequently detected which led to our agency opening UST cleanup cases for those sites. With the upgraded systems, there are now only a few new UST cases per year, and the cases remaining open are mostly those that have significant impediments (e.g., particularly severe and/or complicated contamination impacts, recalcitrant responsible parties, lack of funding).

We currently have 157 open cases.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 4.35 PY within the unit; 2.4 PY support positions outside the unit.

### 1.b - Site Cleanup Program

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

Many of the sites are enrolled in the State Board's Site Cleanup Cost Recovery Program, in which the responsible parties are billed for staff time. Our agency 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.

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

We currently have 255 open SCP cases.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 3.4 PY

### **1.c - Department of Defense (DoD) Cleanup Program**

**Summary:** The DoD cleanup program has to do with a separate funding mechanism and separate state-federal agreements for cleanup work on current of 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 of our DoD cleanup program sites are formerly used defense sites (FUDS) and are no longer active military facilities. We currently have open cases for approximately 18 FUDS, 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:** None

**PY Allocation for FY 18/19:** 1.0 PY

### **1.d - Spill response**

**Summary:** The site cleanup unit respond to some of the hazardous material spill reports that our agency receives. Any spill that will involve significant cleanup work overseen by our agency become cases, and are thus covered under task 1.b. However, we receive other spill reports that require our attention, often times at the request of local agencies overseeing the immediate spill response, that only require interagency consultation and perhaps a site inspection. When significant oversight time is not anticipated, these responses do not become cases, and are covered with SCP program overhead funding.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 PY

### **1.e - Respond to public inquiries on closed cases or non-case property evaluations.**

**Summary:** Our agency receives multiple public inquiries a 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, we receive 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 document releases that will necessitate our oversight and direction as new UST or SCP cases, many of these document investigation findings that do not warrant oversight by our agency. Receiving the feedback from our agency that we would not require further work can be important to redevelopment. Thus, we try to provide such evaluations and responses in a timely manner.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.1 PY

### 7.3 Performance Targets

The general goal with the cases is to define the extent of contamination, remediate the contamination as necessary, verify remediation sufficiency through additional testing and monitoring, and institute any necessary engineering or institutional controls to prevent future exposures. Upon successful completion of this process, the case is closed. This ties into the ORPP tracked goals for the programs: number of new cases moved into remediation and number of cases closed.

#### 7.3.1 Reported to State Board via ORPP

**Table 6 - Performance Targets for the last FY and proposed for FY 18/19**

FY 17/18 Performance Targets	Target	Reported
# of DoD Sites New into Active Remediation	0	1
# of SCP Sites New into Active Remediation	4	8
# of SCP Sites Projected Closed	4	8
# of UST Sites New into Active Remediation	5	3
# of UST Sites Projected Closed	10	8

FY 18/19 Performance Targets	Target
# of DoD Sites New into Active Remediation	0
# of SCP Sites New into Active Remediation	4
# of SCP Sites Projected Closed	4
# of UST Sites New into Active Remediation	5
# of UST Sites Projected Closed	10

## 8.0 GROUNDWATER PROTECTION PROGRAM

### 8.1 Core Activities and Projects by Priority

The primary responsibilities of the Groundwater Specialist are categorized based on priority listed in Table 7.

**Table 7 – Groundwater Protection Strategy**

Priority Level	Activity/Project	Category	Deadline (FY 18/19 unless noted otherwise)
1	a. Develop a Phase II Basin Plan Amendment & Policy Statement	Core	July 2020
	b. Conduct Data Screening and Basin Wide Groundwater Quality Assessments	Core	January 2019
	c. Update Orders office-wide to include groundwater protection control measures	Core	On-going
2	a. Participate in the Statewide Emergency Response Technical Working Group	Special	On-going
	b. Assist in the development and implementation of the Statewide Source Water Protection Action Plan	Special	On-going
	c. Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team	Core	On-going
3	a. Participate in the Constituent of Emerging Concern Initiative	Special	On-going
	b. Conduct special investigations at sites where there is a threat to groundwater quality	Special	On-going

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

### 8.2 Core Activity and Project Descriptions

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

#### 1.a – Develop the Phase II Basin Plan Amendment and Policy Statement

**Summary:** *The Groundwater Protection Strategy* is intended to develop a *Policy Statement in Support of Maintaining High-Quality Groundwater* as part of the Phase II Basin Plan Amendment (BPA). The Phase II BPA will propose a programmatic approach to managing salts and nutrients in groundwater, as per the Statewide Recycled Water Policy; update Table 2-1 to include beneficial uses for individual groundwater basins, where appropriate; provide considerations for groundwater recharge, and provide editorial corrections and clarifications to Chapter 4 of the Basin Plan.

**Key Issues to Resolve:** None.

**PY Allocation for FY 18/19:** 0.50 Senior Specialist and various PY fractions from team members.

Milestones	Target Date (by FY Quarter)
<i>Basin Plan Amendment &amp; Policy Statement</i>	<i>FY 2019-20/Q3</i>

**1.b - - Conduct Data Screening and Basin Wide Groundwater Quality Assessments**

**Summary:** The Groundwater Strategic Team has identified the development of procedures to assess the conditions of water quality and potential risks to beneficial uses at basin/aquifer scale as a priority project. In order to support the development of Phase II BPA and utilize a data-driven adaptive management approach for groundwater protection it is necessary to screen each priority basin<sup>7</sup> for salts, nutrients and other constituents of concern (COCs). The North Coast Region contains 58 groundwater basins<sup>8</sup>. The combined priorities of the Groundwater Ambient Monitoring and Assessment (GAMA) Program and Department of Water Resources (DWR) Sustainable Groundwater Management Act (SGMA) efforts result in 16 priority basins within the North Coast Region. The primary objective of this effort is to broadly assess the conditions of the 16 priority basins within the North Coast Region to evaluate the status, trends and further refine our understanding of anthropogenic effects on groundwater quality and potential risk to beneficial uses.

The scope of work includes:

1. Screen the GAMA database for salts, nutrients, and other constituents of concern in each of the 16 priority groundwater basins by comparing concentrations over time (e.g., 10 year averages, median values, individual well trends, and pollutant hot spots) to water quality standards (objectives, beneficial uses, and background water quality).
2. Screen the GAMA database for DWR well drillers logs to compile a record of potential sensitive receptors such as domestic, municipal and agricultural supply wells in each of the 16 priority groundwater basins.
3. Develop a list of findings and program recommendations for each of the 16 priority basins.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.2 Senior Specialist and various PY fractions from team members.

Milestones	Target Date (by FY Quarter)
<i>Complete Basin Wide Assessment for TDS and Nitrate in the GAMA and SGMA Priority Basins</i>	<i>FY 2019-20/Q1</i>

<sup>7</sup> AB 599 requires the monitoring framework to use public-supply wells as the primary factor for basin ranking in conjunction with several secondary factors. Six individual factors are used to rank ground-water basins: (1) area, (2) number of public-supply wells, (3) municipal ground-water use, (4) agricultural ground-water use, (5) number of leaking underground fuel tanks, and (6) number of square-mile sections with registered use of pesticides. Given these factors, four categories or priority basins are identified. A fifth category includes public supply wells outside mapped basins; and a sixth category includes the remaining “low use” basins.

<sup>8</sup> As defined by DWR Bulletin 118

**1.c –Update Orders office-wide to include groundwater protection control measures**

**Summary:** Continue to update and renew orders that are protective of groundwater resources. A high priority of the Groundwater Strategic Team is to provide support for improving groundwater protection efforts through our compliance programs by establishing baseline conditions for Regional Water Board staff to consider when developing permits and cleanup and abatement orders, antidegradation analysis, and monitoring and reporting programs. To date the team has provided data analysis and/or recommendations for:

- NPDES facilities including Humboldt Creamery, Healdsburg, Forestville, Graton, Sonoma-West Holdings, Cloverdale, Ukiah, McKinleville, and Ferndale;
- The State Water Board General WDR for Cannabis Cultivation;
- Local agency management plans for Humboldt Co., Mendocino Co, and Sonoma Co.;
- The Dairy Program WDR; and
- The Vineyard & Orchard Program.

In FY 18-19, the Groundwater Strategic Team and Senior Specialist will continue to provide data analysis and recommendations for groundwater protection measures at various municipal and industrial facilities currently regulated under NPDES and WDR permits.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist and various PY fractions from team members.

Milestones	Target Date (by FY Quarter)
<i>Update NPDES permits and WDR orders with groundwater protection measures</i>	<i>On-going</i>

**2.a – Participate in the Statewide Emergency Response Technical Working Group**

**Summary:** The Emergency Response Technical Working Group (ERTWG) is a statewide effort to develop disaster preparedness plans, procedures, and tools for the State Water Board, Regional Water Board and Division of Drinking Water staff. This includes processing lessons learned from previous disasters, such as the fires of October 2017, to inform future decisions and promote more efficient and effective coordination when responding to emergency operations that potentially affect water quality.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist

Milestones	Target Date (by FY Quarter)
<i>Tied ERTWG &amp; MCC recommendations</i>	<i>On-going</i>

## 2.b – Assist in the development and implementation of the Statewide Source Water Protection Action Plan

**Summary:** On July 1, 2014, the Drinking Water Program transferred from the California Department of Public Health to the State Water Board, and was renamed to the State Water Board Division of Drinking Water. This transfer of responsibility aligns the state's drinking water and water quality programs in an integrated organizational structure to best position the state to effectively protect water quality and public health, while meeting current needs and future demands on water supplies. The Source Water Protection Project is a State Water Board effort led by the GAMA unit to integrate program goals to support source water protection activities across divisions and offices at the Water Boards, as well as with applicable agencies, and to coordinate these efforts. The Source Water Protection Project will also create a central, online, public location for data supporting source water protection, including the ability to create source water protection plans and download data.

The purpose of the Source Water Protection Action Plan is to document current activities at the State and Regional Water Boards (Water Boards) that currently support protection of drinking water sources, and outline the actions the Water Boards can expand or develop in order to support and coordinate source water protection. Six categories of action items for the Action Plan were developed by the Source Water Protection work team. The categories are:

1. Collect, Standardize and Share Data
2. Increase Coordination within Water Boards and with Other Agencies
3. Identify and Pursue Policy Issues
4. Expand Funding Opportunities
5. Develop Public Messaging and Outreach
6. Enhance Regulatory Programs

Some action items need further explanation and edits by expert members to develop the subject matter and goals. The following initiatives will be drafted by the Senior Specialist in coordination with other specialists and executive management from the Central Valley, Central Coast and San Francisco Bay Regional Water Boards.

- **Coordination and Data Sharing Between Clean Water Act and Safe Drinking Water Act (SWP) Programs** (known as *Impaired Waters/ Total Maximum Daily Load (TMDL)/ NPS* in the initiatives list below) – R1 and R2 staff
- **Permitting Supply Wells in Agriculture Areas and Human Right to Water/ Disadvantaged Community** – R1, R2, R3 and R5 staff

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist



Milestones	Target Date (by FY Quarter)
<i>Assist with the development and implementation of a Source Water Protection Action Plan</i>	<i>On-going</i>

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

**Summary:** Developing and strengthening external partnerships is part of the Regional Water Boards vision and a core goal of the Groundwater Strategic Team. Staff plan to continue partnering with the following agencies:

- California Department of Fish and Wildlife
- Department of Water Resources
- Groundwater Resource Association
- Local cities, counties, and Groundwater Sustainability Agencies
- Local stakeholders including business and non-profit
- Nature Conservancy
- UC Davis
- U.S. Geological Services
- State Water Board

The purpose of developing and strengthening these partnerships is to achieve common goals and further groundwater protection efforts throughout the North Coast Region.

1. *Phase II Basin Plan Amendment:* Stakeholder outreach to support the Phase II BPA development and implementation.
2. *Basin Scale Groundwater Assessments:* Make groundwater data assessments available to the public to establish baselines and trends of groundwater quality.
3. *Sustainable Groundwater Management Act:* Engage and observe GSA formation and groundwater sustainability plan development to achieve common goals and ensure groundwater quality protection.
4. *Periodic Meetings and Presentations:* Coordinate with local GSA, cities, and counties to exchange information on groundwater policy, emerging tools, and the latest scientific findings.
5. *Statewide Policy Development:* Partnering with the State Water Board on development and implementation of the Recycled Water Policy, Source Water Protection Action Plan, and with local GSAs to ensure the unique characteristics of the North Coast Region is adequately represented and a focus remains on protecting high-quality waters.
6. *Groundwater/Surface Water Interaction:* Continue the Mark West Creek well log review project, engage cannabis and salmon interagency workgroup, and supporting locals on site-specific pilot projects that further our understanding of local hydrogeologic conditions throughout the region.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist

### **3.a – Participate in the Constituent of Emerging Concern Initiative**

**Summary:** The Water Boards have worked on several projects to monitor for Constituents of Emerging Concern (CECs) and to identify the CECs that are of the highest risk to human health and the environment. The long-term objective of the CEC initiative is to develop a statewide strategy to monitor and control CECs. Participation in this effort is necessary to:

- Make initial steps towards development of a statewide management strategy for CECs.
- Improve coordination within the Water Boards on CEC-related issues.
- Make CEC vocabulary and definitions of terms consistent.
- Reduce frequency of duplicative CEC efforts.
- Make a transparent communication effort.
- Assess the status of State & Regional Water Boards and Division of Drinking Water CEC efforts and then build mechanisms to coordinate these ongoing efforts.
- Evaluate regional monitoring efforts and pilots project to assess novel approached to monitoring and future monitoring priorities.
- Evaluate monitoring results to assess potential impacts to beneficial uses and integrate appropriate monitoring into our regulatory programs.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist

### **3.b – Conduct special investigations at sites where there is a threat to groundwater quality**

**Summary:** Several site-specific special investigations have been assigned to the Senior Specialist in the past two years to assess potential threats to groundwater quality in support of enforcement actions. The Senior Specialist provides expertise and recommendations on work needed to adequately assess groundwater impacts at these various sites. In FY 18-19, the Senior Specialist will continue to guide these investigations as well as any new special investigations as needed.

**Key Issues to Resolve:** None

**PY Allocation for FY 18/19:** 0.05 Senior Specialist

## **8.3 Performance Targets**

### **8.3.1 Reported to State Board via ORPP**

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