



Agricultural Council
of California

Waste Discharge Requirements

April 9, 2013

Committee Work:

- Two stakeholder meetings on Nov. 28 & Mar. 6;
- 87 participants on official committee;
- Additional outreach conducted with some feedback;
- Still getting anecdotal information with regards to cost;
- Seeking potential recommendations for June report.

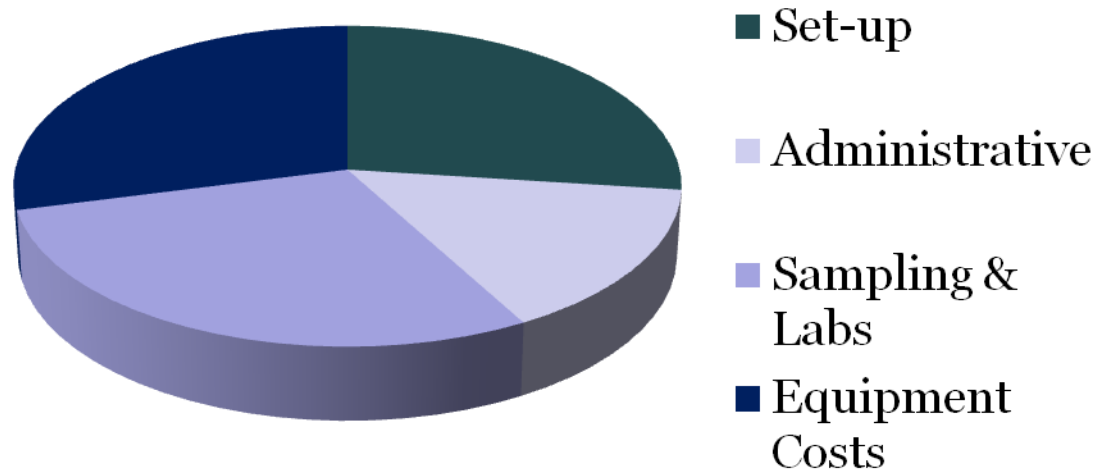
Overarching Themes from Meetings & Correspondence:

- If we simplify the process enough, staff can take a targeted approach by focusing on bad actors, encouraging technology and improving the environment;
- New regulations and revisions must be outcome-oriented vs. process-based;
- Compliance for this permit is immensely complex;
- No call for relaxation of environmental standards.

Examples of Excessive Costs of Compliance:

- Sampling & Reporting;
- Creation of Plans;
- Equipment Costs;
- Creation of Annual Report.

Costs of Compliance Break-down:



Potential Short Term Solutions:

- Allow waiver for low priority applications;
 - Some permit applications are under consideration for over ten years.
- Reevaluate what requires a “licensed professional”;
- Eliminate redundancies in the monitoring program;
- Consider location of discharge;
- Self-monitoring with spot-checks as opposed to required data collection;
- Reduce paperwork burden when it makes logical sense;
- Create or consider environmental electronic reporting tool such as ISO-14001 Environmental Management Systems.

Potential Long Term Solutions:

- Move from process-based to outcome-oriented solutions and allow options for compliance;

Example: Create allowance for a water quality improvement plan with mutually agreed-upon goals, but allow flexibility to achieve goals;

- Create representative sampling programs for industries or watersheds that do not already have them;
- Execute sampling program that is strategic in frequency and location;
- Evaluate cost-share programs that may assist with equipment costs;
- Field trips for staff to gain better understanding of issues, existing and emerging technology.

Outstanding Challenges:

- Very unique issues between industry segments;
- Costs often times do not include internal staff time devoted to compliance;
- Potential legal challenges;
- CV-SALTS;
- Nitrates in ground water recommendations.

Next steps:

- Document compliance costs for industries & regions not already documented;
- Suggest strategies for representative sampling & improved sampling strategies in other areas;
- Seek-out additional solutions;
- Recommend implementation timeline.

Questions?

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