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:

- Set-up
- Administrative
- Sampling & Labs
- Equipment Costs
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?

Emily Rooney, Ag Council  
(916) 443-4887

Bob Gore, The Gualco Group  
(916) 441-1392