

Drinking Water Notification Process

Central Coast Regional Water Quality Control Board

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Issues Before the Regional Board Today

#1 – Should CCGC be subject to the same level of reporting as required of individuals?

#2 – Does CCGC's current reporting provide Regional Board staff with sufficient access to information to verify that notifications have been issued?

3 – Does CCGC's current program ensure that residents and employees using domestic wells on member properties are:

- Notified of health risks
- Provided safe drinking water where appropriate?

#4 – Should information above be available to the general public?

CCGC's Conclusions in Response to Issues of Concern

- #1 Coalition reporting does not need to equal individual reporting, and in fact CCGC provides additional information benefiting the public
- #2 CCGC reporting provides appropriate level of verification & Regional Board access to individual information
- #3 CCGC follow-up ensures that health notifications have occurred, and that follow up action is being taken (if necessary)
- #4 Public will have access to appropriate level of information with contour maps

State Board Order WQ 2013-0101 Does Not Require Equal Reporting

Order WQ 2013-0101

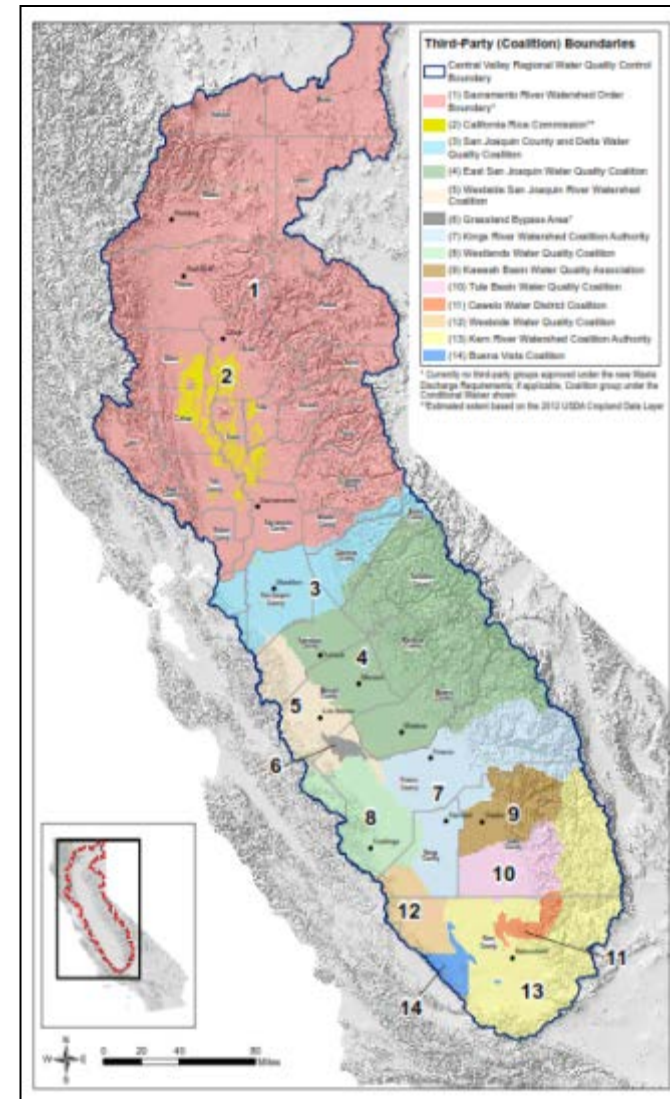
- Supports third-party approaches, which allows third-parties to act as intermediaries
- Reporting should not be at “too high a level of generality”
- Must verify adequacy and effectiveness of waiver conditions

Staff Report

- Agrees that equal reporting is not required

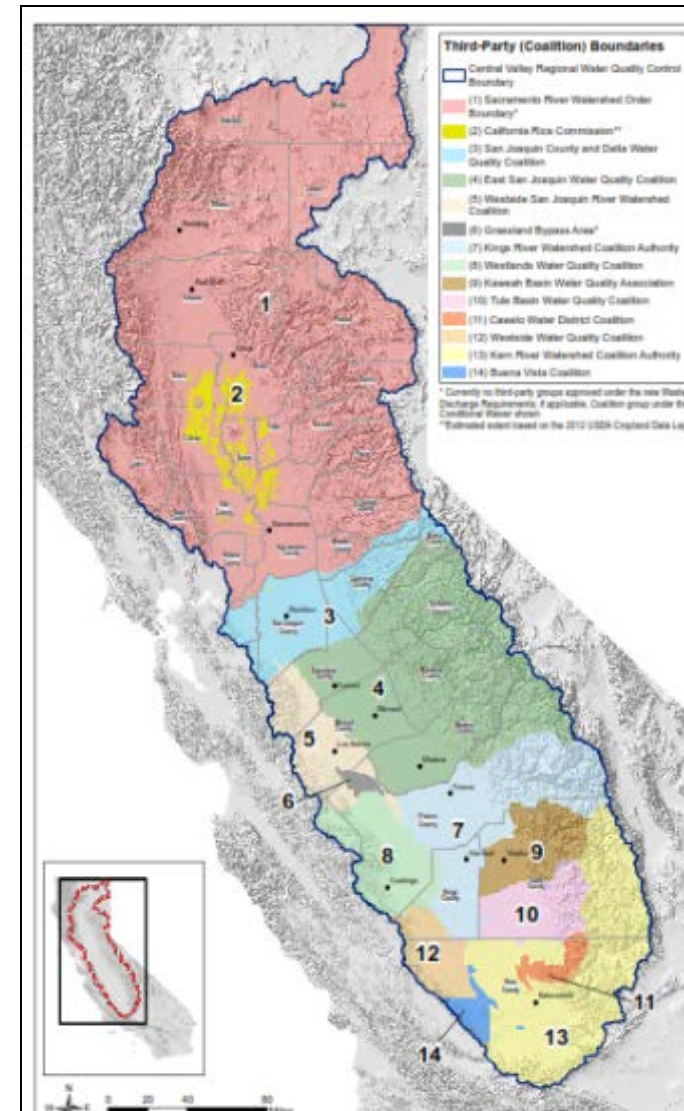
Coalitions Play Essential Role in Irrigated Lands Regulatory Programs

- Many growers are more comfortable working with coalitions that understand agriculture
- Coalition water sampling ensures consistency in quality of results and consistency in reporting



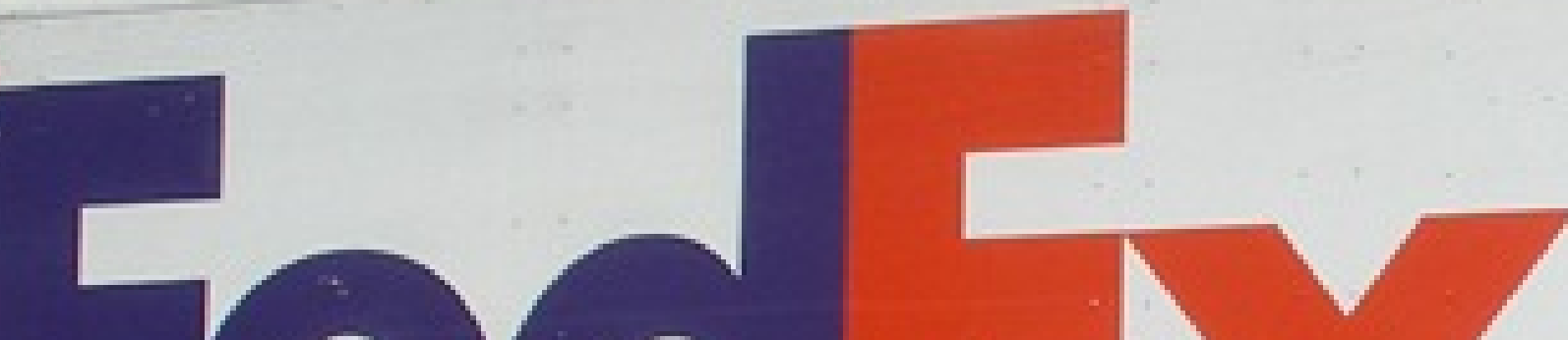
Coalitions Play Essential Role in Irrigated Lands Regulatory Programs

- Coalitions can efficiently evaluate data across geographical areas
- Coalition outreach is direct:
 - Members must affirmatively chose to join
 - They understand their obligations for joining
 - Failure to fulfill obligations results in dismissal



CCGC Provides Regional Board with Information to Verify Effectiveness of Domestic Well Monitoring *(A condition of Ag Waiver)*

- Reports all exceedances to Regional Board within 10 days of data validation
- Notification letter, including instructions for posting health information, sent to members via Federal Express overnight delivery



CCGC Provides Regional Board with Information to Verify Effectiveness of Domestic Well Monitoring *(A condition of Ag Waiver)*

- CCGC provides:
 - Table of Exceedances to Regional Board: Well ID, Global ID, date member notified

- Exceedance Follow Up Information

- Uploads data to GeoTracker

To date, majority of CCGC efforts



CCGC Exceedance Report – Coalition Monitoring

Table 1. List of nitrate results from wells monitored April 29--May 1, 2014 for Coalition monitoring (Pajaro Valley). Sorted by FieldPointName. Two wells sampled were originally designated as domestic prior to sampling, however, appeared to be irrigation wells. Members are being contacted for confirmation of the well type. Notifications will be updated if they are confirmed to be Domestic.

GlobalID	Field Point Name	Field Point Class	Sample Date	Analyte	Result (mg/L)	NO3_WQO	Notification Date	Notification Confirmation Date*
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	100	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	60	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	5	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	85	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	200	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	5	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	40	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	10	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	<1	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	<1	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	76	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	AGIR	1/Jan/2014	Nitrate as NO3	40	Exceeds 80 Pct WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	2	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	75	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	2	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	210	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	160	Exceeds WQO	2/1/2014	2/2/2014
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	15	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	AGIR	1/Jan/2014	Nitrate as NO3	100	Exceeds WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	1	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	5	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	3	Does not exceed WQO	2/1/2014	
AGC100000001	CCGC_0000	PRIW	1/Jan/2014	Nitrate as NO3	<1	Does not exceed WQO	2/1/2014	

*Confirmation tracked for domestic wells with nitrate concentrations greater than 45 mg/L..

Table 1. Summary of responses regarding treatment or alternative drinking water supplies for wells affected by drinking water exceedances of the nitrate water quality objective. Counts are the number of wells associated with a response. Dates in the column headers are the dates that wells were sampled.

Follow Up Response	10/21/13 - 10/25/13*	11/19/13 - 11/22/13	12/02/13 – 12/11/13	12/16/13 – 12/18/13	01/06/14 – 01/10/14	01/20/14 – 01/24/14	01/28/14 – 01/31/14	02/18/14 – 02/20/14	Total Well Count
BW	16	1	2	3	1	4	3	1	31
Filter	3					1			4
Not Used	6					1		5	12
RO Unit	8	3	3	6	2	8		2	32
BW/RO Unit					2				2
BW/Ion Exchange					1				1
BW/Filter					1				1
Total Responses	33	4	5	9	7	14	3	8	83
Total Exceedances	33	4	5	9	7	14	3	8	83
Percent Response	100%	100%	100%	100%	100%	100%	100%	100%	100%
Monitoring Type	Coalition	Individual	Individual	Individual	Individual	Individual	Individual	Coalition	All
Date Reported to Regional Board	1/31/14	3/12/14	3/12/14	4/08/14	4/08/14	4/28/14	4/28/14	5/22/14	4/28/14

BW – Bottled Water RO – Reverse Osmosis

*Additional correspondence has occurred between the CCGC and members with exceedances of nitrate in samples collected in October. The CCGC has done additional follow up with these members based on changes to the follow up questions and to verify/clarify some of the original responses. Some of the responses have been updated based on these recent communications (initiated on March 13, 2014).

CCGC's Proposed Modifications to Increase Verification and Accuracy

- Provide Regional Board staff access to all documents at CCGC's home office, or other agreed upon location
 - Staff would be allowed to audit & review all documents
- Add penalty of perjury statement to all of its submittals

CCGC's Proposed Modifications to Increase Verification and Accuracy

- Work directly with County Health Departments
- Add new columns to existing report describing follow up actions, specific to domestic well

Field Point Name	Field Point Class	Sample Date	Nitrate as NO3 Result (mg/L)	NO3_WQO	Notification Date	Notification Confirmation Date*	Replacement Water Action	Date Initiated	Date Reported	User Notification Date	Manner of Notification
CCGC_0000	PRIW	12/Mar/2014	25	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	14/Mar/2014	6	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	14/Mar/2014	14	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	11/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	11/Mar/2014	4	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	35	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	6	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	12/Mar/2014	56	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						



on supply well. PRIW - domestic supply well or combination of irrigation and

Notification Confirmation Date*	Replacement Water Action	Date Initiated	Date Reported	User Notification Date	Manner of Notification

Local Agricultural Associations Committed to Maintaining Records

- Regional Board record retention practices requires maintenance of records for five years
- CCGC voluntarily agrees to maintain all records for five years from submittal

Local Agricultural Associations Committed to Maintaining Records

- Should CCGC dissolve, Grower-Shipper of the Central Coast and Grower-Shipper of San Luis Obispo and Santa Barbara Counties agree to maintain CCGC records for five years for their counties



**Grower Shipper Association of
Santa Barbara and San Luis Obispo**

Regional Board Staff Have Existing Authority to Access Information and Inspect Member Properties

- **RB staff may review all CCGC records at CCGC's home office**
- **Already have access to the regulatory side of GeoTracker, which includes specific latitude and longitude information for domestic well sample results**
- **Waiver Condition 46 – May investigate/inspect properties to determine compliance with provisions of Waiver**

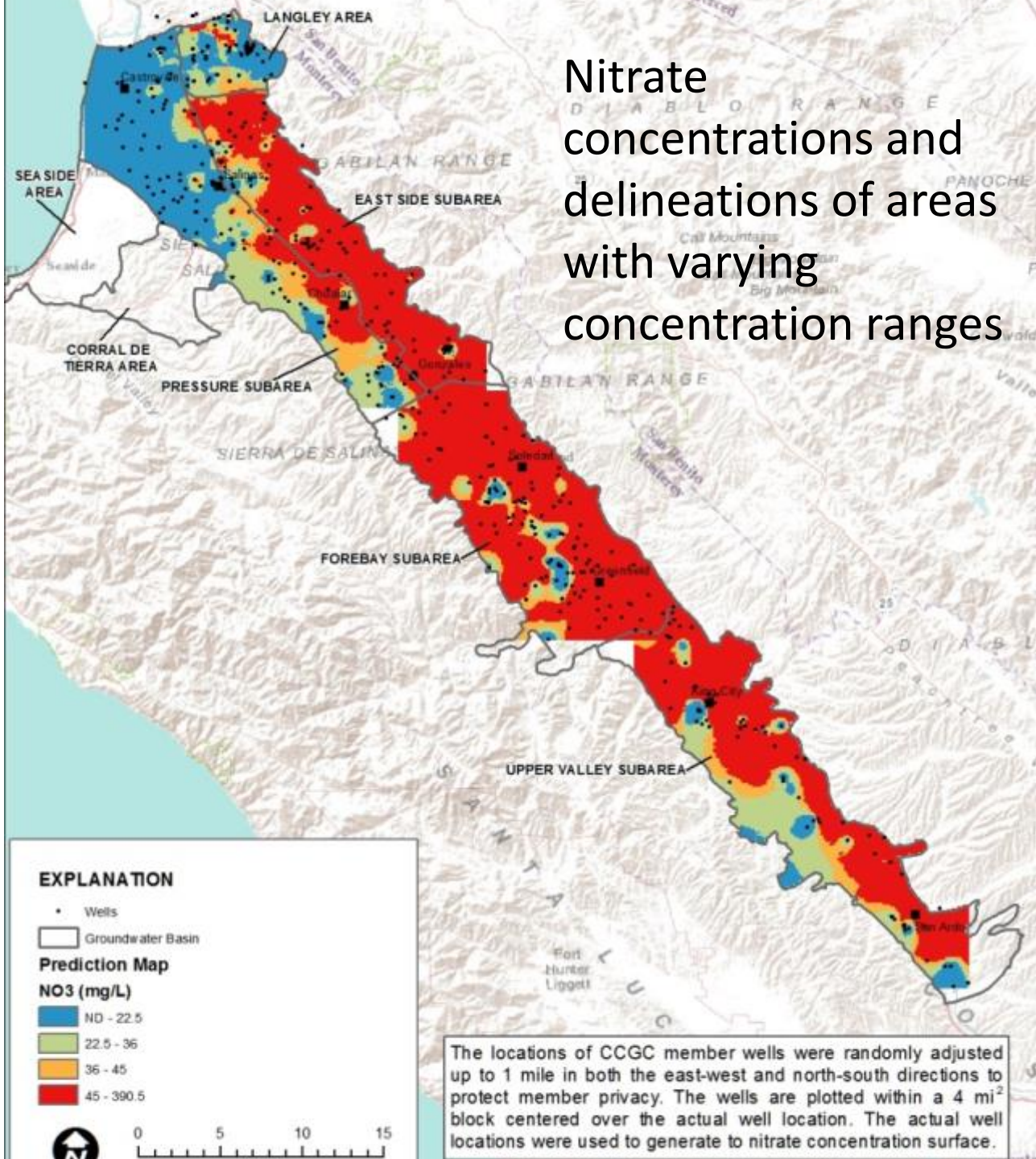
Reasons Specific Well Exceedance Information Should Not Be Publically Available

- **Domestic wells are on private property**
 - Tenants have the right to privacy
 - Exceedance in domestic well doesn't mean the member is responsible for causing the exceedance
- **Domestic wells are on active agricultural operations**
 - USDA Food Security Policy issues
 - Safety issues on the farm for visitors
 - Potential liability to member for un-authorized persons entering private property

CCGC Contour Maps Will Provide Public With Information Regarding Groundwater Quality in Their Area

- Final reports posted 1st quarter 2015
- Technical reports (including maps) already available on CCGC website (draft version)
- If not on GeoTracker, final will be posted on CCGC site (www.centralcoastgic.org)

Nitrate concentrations and delineations of areas with varying concentration ranges



EXPLANATION

- Wells
- Groundwater Basin

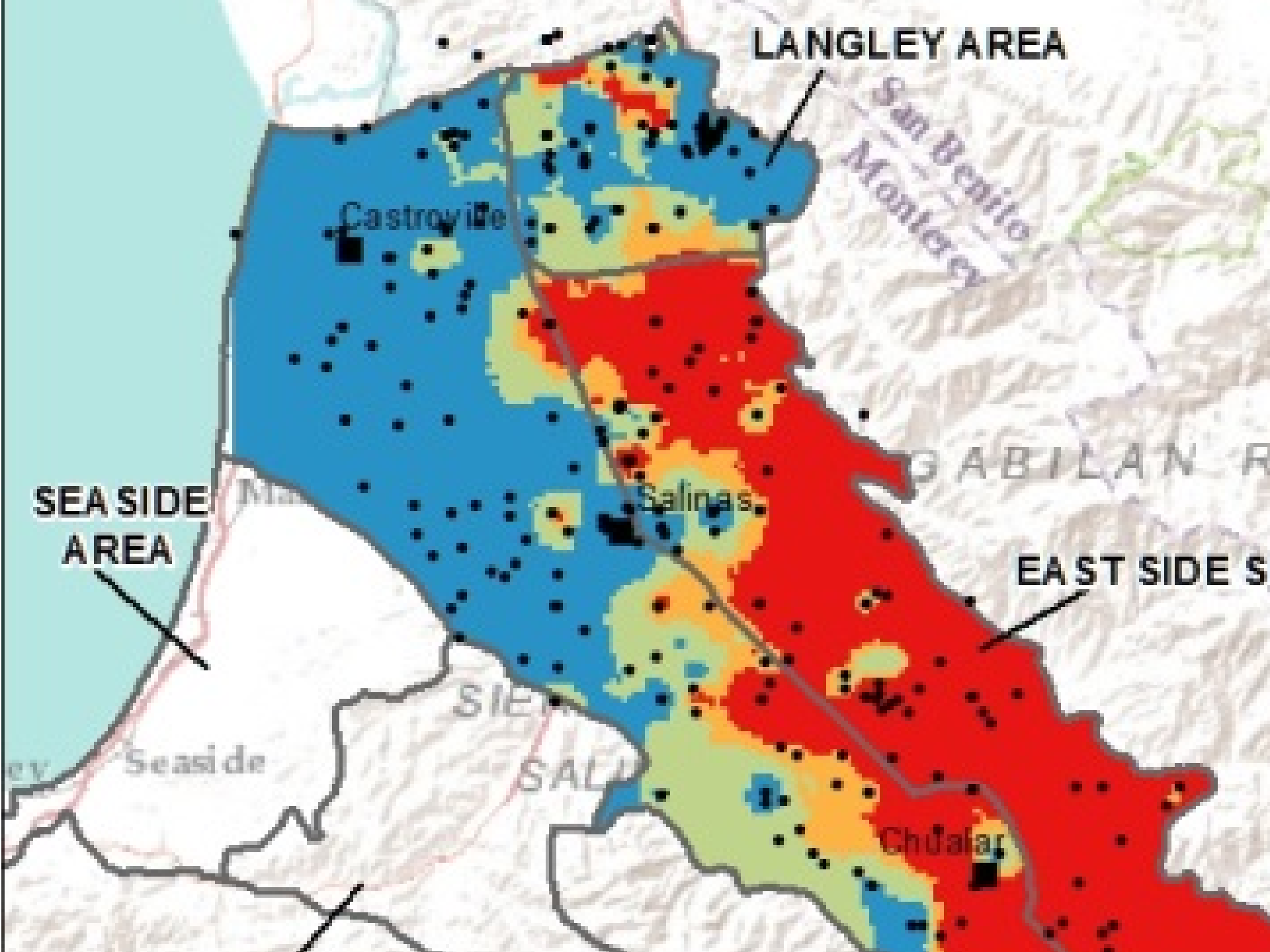
Prediction Map

NO3 (mg/L)

- Blue: ND - 22.5
- Green: 22.5 - 36
- Yellow: 36 - 45
- Red: 45 - 390.5

0 5 10 15

The locations of CCGC member wells were randomly adjusted up to 1 mile in both the east-west and north-south directions to protect member privacy. The wells are plotted within a 4 mi² block centered over the actual well location. The actual well locations were used to generate the nitrate concentration surface.



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Tim Borel

– Nunes Co.

– Chair, Central Coast Groundwater Coalition



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Questions for Us?

Parry Klassen

➤ **Central Coast Groundwater Cooperative**

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