



June 10, 2104

Via Electronic Mail Only

Mr. Ken Harris
Central Coast Water Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401
Ken.harris@waterboards.ca.gov

Re: Central Coast Groundwater Coalition Response to Request for Additional Member Information

Dear Mr. Harris:

The Central Coast Groundwater Coalition (CCGC) submits this letter in response to your requests for grower specific notification letters, as well as grower specific information with respect to follow-up actions that are being taken by growers if domestic well results indicate that the nitrate drinking standard has been exceeded. You and your staff have specifically asked us to provide you with our explanation as to how the approach taken by the CCGC is consistent with the law, program approvals, and the Central Coast Regional Water Quality Control Board's (Central Coast Water Board) purposes of the program. As requested, we do so here.

As a preliminary matter, we find it necessary to challenge the Central Coast Water Board staff's position that reporting and notification requirements for growers in a coalition must be equal to those that are imposed on individuals. Such a position defeats the purpose of having coalitions altogether. Further, we find such a position to be contrary to the State Water Resources Control Board's (State Board) stated reasons for supporting third-party, or coalition type programs. When it adopted State Board Order WQ 2013-0101,¹ the State Board specifically addressed the use of third-parties as part of addressing agricultural discharges. And while the State Board cautions against reporting that is too generalized, it does not mandate or imply that third-party reporting must be "equal" to that which is required for individuals.

“. . . we believe it is important here for us to express our support of third party approaches generally. There are a number of advantages to utilizing a third party approach to regulation of agricultural discharges. From a resource perspective, third parties allow a regional water board to leverage limited regulatory staff by

¹ *In the Matter of Review of Conditional Waiver of Waste Discharge Requirements Order No. R3-2012-0011 For Discharges from Irrigated Lands* (Order WQ 2013-0101), adopted by the State Board on September 24, 2013.

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acting as intermediaries between the regional water board staff and the growers, freeing regional water board resources to focus on problem areas or actors. . . . We recognize the need to be wary of third party programs that report compliance at too high a level of generality. As a result, we expect the Central Coast Water Board to review proposals carefully to ensure consistency with legal requirements to verify the adequacy and effectiveness of waiver conditions and provide sufficient feedback mechanisms for determination of whether the required controls are achieving the Agricultural Order's stated purposes. However, we also expect the Central Coast Water Board to give fair and due consideration to proposed third party projects and programs and work with third party groups in good faith to develop viable alternatives. (State Board, Order WQ 2013-0101, pp. 13-14.)

In consideration of the State Board's direction, we must determine what constitutes "sufficient" feedback to ensure that the provisions as adopted by the Central Coast Water Board, and as revised by the State Water Board are achieved. As explained in this communication, the CCGC contends that its current program and level of reporting to the Central Coast Water Board is beyond sufficient, and that providing individual notification letters is not required by law or necessary for the Central Coast Water Board to ensure that the Agricultural Order's stated purposes are being achieved. Further, such requirements will undermine the intent and purpose of a third-party program, and will provide no greater protection for water quality.

The Central Coast Water Board also needs to fully understand the significant administrative burden that the CCGC has taken on to further the goals of this program. The CCGC and its consultants spend hundreds of hours in compiling sampling results, preparing notification letters, answering individual member questions, and preparing reports for submittal to the Central Coast Water Board and for uploading on GeoTracker. All of the work done by the CCGC benefits the Central Coast Water Board, and allows the Central Coast Water Board to focus its limited staff resources on individuals that are not participating in the CCGC's cooperative monitoring program. This provides the Central Coast Water Board with a significant advantage in managing its workload.

I. Overview of CCGC Accomplishments to Date

Before specifically discussing the two pending notification issues, the CCGC wants to remind the Central Coast Water Board of the extraordinary work that the CCGC has been able to accomplish in such a short time period. In addition to the hundreds of administrative hours mentioned above, the CCGC has completed a significant amount of domestic well monitoring over a relatively short period of time. Specifically, and in accordance with workplans approved in July 2013 and December 2013, the CCGC has accomplished the following:

- Submission of the groundwater characterization technical memorandum for Salinas Valley on May 1, 2014;

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- Sampled 889 wells as of June 5, 2014 in Santa Cruz, Monterey, Santa Clara, San Benito, San Luis Obispo, Santa Barbara, and Ventura counties, of which almost 600 wells are used for domestic drinking water purposes;²
- In the process of resampling approximately 535 wells in Santa Cruz, Monterey, Santa Clara, San Benito, San Luis Obispo, Santa Barbara, and Ventura counties;
- Sent via overnight mail 157 exceedance notifications to members with domestic wells above the drinking water standard;
- Submitted timely reports to the Central Coast Water Board on well locations for sampling, well analysis results, and summaries of exceedance notifications;
- Uploaded more than 650 well results to the regulatory side of GeoTracker (as of June 1).

CCGC has also worked closely with staff to ensure the reports were accurate and used formatting that is clear and organized for easy review. By way of comparison, and to truly understand the level of effort that has been accomplished in such a short time period, the Central Coast Water Board's website includes reference to a similar domestic well monitoring effort being conducted by the United States Geological Survey (USGS). (See, www.waterboards.ca.gov/centralcoast/water_issues/programs/gap.) According to the website, the USGS sampled 90 domestic wells between October 2012 through May 2013. In other words, the CCGC well monitoring program (almost 600 wells used for domestic purposes) has sampled 6 times the number of wells that the USGS sampled during a similar period of time. Moreover, the CCGC expects to collect a second sample on 500 plus domestic wells over the next three months.

Above and beyond the monitoring and notification requirements identified in the approved workplans, and in the interest of public health, the CCGC also determined it appropriate to obtain information from its members with respect to follow-up actions that have been taken if a domestic well is found to exceed the nitrate drinking water standard. Because such information is not required by the Conditional Waiver or Order WQ 2013-0101, the CCGC's request for such information specifically noted that providing this information was voluntary, and that the CCGC would submit such information to the Central Coast Water Board in a summary/aggregated format. Specifically, we asked members to confirm notifications to occupants of residences where nitrate levels were above the drinking water standard, and to report follow-up actions taken, including but not limited to supplying replacement bottled water or installing treatment systems for the residences. Based on responses received to date, the CCGC is pleased to state that all growers/landowners that had domestic well exceedances have reported that notifications were properly provided and that appropriate follow-up action was taken to ensure that public health is protected.

² The numbers here represent the number of wells sampled by the Coalition as well as individual fall and spring sampling conducted by members based in the south as of June 5, 2014.

Based on this brief overview, one can clearly see that the CCGC is working hard to fulfill its obligations to the Central Coast Water Board, achieve the purposes of the Conditional Waiver and Order WQ 2013-0101, and protect public health all while maintaining its commitments to its members. The results of the CCGC program to date clearly show that it is able to achieve all of these purposes.

II. Request for Individual Notification Letters

One issue of concern for the CCGC is the Central Coast Water Board's request for copies of *all* individual notification letters sent by CCGC to its members notifying them of an exceedance(s) of the nitrate drinking water standard if monitoring results indicate that such an exceedance exists in a domestic drinking water well. We understand that the Central Coast Water Board staff believes it has the authority to request such information because its December 17, 2013 approval letter includes the following statement as a "condition" of approval: "The Coalition must also provide copies of the individual notification letters sent to Coalition members informing them of the exceedance of the drinking water standards, upon request of the Central Coast Water Board." For the reasons discussed below, the CCGC believes that the Central Coast Water Board does not have the authority to request copies of Coalition issued individual notification letters, regardless of the language contained in the December 17, 2013 letter. Further, and as will be explained, the CCGC contends that its current level of reporting and availability of documents to the Central Coast Water Board provides for a sufficient level of information to ensure that the objectives of the Conditional Waiver and the State Board Order are achieved. Finally, the CCGC's understanding of what the Central Coast Water Board staff meant with respect to the terms "upon request" do not comport with staff's pending action of requesting *all* individual notification letters.

A. CCGC Complies With Existing Orders and Provides the Central Coast Water Board With Sufficient Feedback

The Central Coast Water Board's general authority for protecting water quality derives from the Porter-Cologne Water Quality Control Act (Porter-Cologne), as adopted by the California Legislature in 1969. The fundamental purpose and objective of Porter-Cologne is to provide the state with authority to have a statewide program for the control of the quality of all waters of the state, and that the "state must be prepared to exercise its full power and jurisdiction to protect the quality of waters in the state from degradation." (Wat. Code, § 13000.) To accomplish such goals, Porter-Cologne provides the state, and in this case the Central Coast Water Board, with the authority to adopt water quality control plans, which consist of the beneficial uses to be protected, water quality objectives, and a program of implementation needed to achieve water quality objectives. (Wat. Code, § 13000.) The Central Coast Water Board also has the authority to control discharges of wastes through a variety of different mechanisms. (Wat. Code § 13260 et seq.) Finally, the Central Coast Water Board is authorized to order clean up and abatement actions, and may require responsible parties to provide replacement water under Water Code section 13304. The issuance of a clean up and abatement

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order is an enforcement order, and as such, is subject to certain due process requirements under the law. (See Cal. Code of Regs., tit. 23, § 648 et seq.)

In general, the Central Coast Water Board's actions being taken here fall under its authority to regulate discharges of waste to waters of the state and fall under Chapter 4, Article 4 of Porter-Cologne. No one disputes that the Central Coast Water Board has adopted a Conditional Waiver that allows for a cooperative groundwater monitoring program. Further, no one disputes the fact that the State Board added new and additional requirements to the Conditional Waiver in its adoption of State Board Order WQ 2013-0101. The individual notification requirements at issue here relate to changes made by State Board Order WQ 2013-0101. The new requirement specifically states:

If a discharger conducting individual groundwater monitoring or a third party conducting cooperative groundwater monitoring determines that water in any well that is used or may be used for drinking water exceeds or is projected to exceed 45 mg/L of nitrate as NO₃ (or 10 mg/L of nitrate + nitrite as N), the discharger or third party must provide notice to the Central Coast Water Board within 24 hours of learning of the exceedance or projected exceedance. For wells on a Discharger's farm/ranch, the Central Coast Water Board will require that the Discharger notify the users within 10 days. For all other wells, the Central Coast Water Board will notify the users promptly. (Order WQ 2013-0101, p. 34.)

The CCGC's current reporting program complies with and is consistent with this new mandate, which was added to the Conditional Waiver by State Board Order WQ 2013-0101. Specifically, the CCGC has promptly provided the Central Coast Water Board with exceedance information within 24 hours of receiving and validating groundwater sample results of domestic wells monitored by the CCGC. Further, the CCGC ensures that dischargers are complying with the 10-day notification to users of such domestic wells by promptly notifying its members with such wells within 36 hours of learning about exceedances, by providing its members with explicit direction regarding the need to notify users within 10 days, and by providing its members with notification information for their use that is consistent with directives contained in State Board Order WQ 2013-0101. The Central Coast Water Board has met its burden of requiring dischargers to notify users within 10 days because it is a condition of approval in the December 17, 2013 approval letter, and this condition is consistent with State Board Order WQ 2013-0101. (See Condition #2, p. 2 ["Within 48 hours of learning of the exceedance or projected exceedance of the drinking water standard, notify Coalition members that they are required by the Central Coast Water Board to notify the landowner and well users of the exceedance within 10 days. The content of the notifications must be consistent with that described in State Board Order WQ 2013-0101."].) There is no dispute that these reporting and notification requirements are now part of the Conditional Waiver that was issued under Water Code section 13269, as revised by the State Board under its own motion review authority. (See, e.g., Wat. Code, § 13320.) Further, there is no dispute that the CCGC program meets and complies with these requirements.

B. Central Coast Water Board Does Not Have the Legal Authority to Request All Individual Notification Letters

The CCGC disputes the Central Coast Water Board's alleged authority to require the CCGC to provide the Central Coast Water Board with all copies of individual notification letters sent to Coalition members, upon Board staff's request. Including this requirement in the December 17, 2013, approval letter does not independently create the authority for such a request. Rather, the Executive Officer's authority for issuing specific conditions and requesting the information identified must be legally based on authority that otherwise exists under the law. First, this requirement was not part of the Conditional Waiver as adopted by the Central Coast Water Board in March 2012, nor was such a requirement included in revisions to the Conditional Waiver as mandated by State Board Order WQ 2013-0101. Since reporting of individual notification letters is *not* required by the Conditional Waiver or State Board Order WQ 2013-0101,³ we must then consider if the Executive Officer has other independent authority to require such information outside of such a requirement being adopted as part of the Conditional Waiver. The CCGC contends that no such authority exists for the requirement to provide individual notification letters as is being requested, and as is included in the December 17, 2013 letter.

It is our understanding that Central Coast Water Board staff are taking the position that they do have such authority under Water Code section 13267, which is titled, "Investigation of water quality; reports; inspection of facilities." Based on a plain reading of this statutory section, we find it difficult to see how requests for individual notification letters falls within this authority. The primary objective of Water Code section 13267 is that it provides regional boards with the authority to investigate the *quality of waters* of the state within its region. (Wat. Code, § 13267(a).) The statute then states that in conducting an investigation specified in subsection (a) (i.e., an investigation associated with "quality of waters of the state") that a regional board may require a discharger to provide technical or monitoring program reports. Copies of individual notification letters sent to growers by the CCGC are not relevant with respect to an investigation of water quality. The information that is associated with water quality are the sampling results from the CCGC's monitoring activities, and this information is being provided to Central Coast Water Board staff in a timely fashion. However, as stated, a letter of notification is not directly related to investigation of water quality and, thus, the Central Coast Water Board has no legal justification under Water Code section 13267 for mandating that such letters be provided as a condition of approval of the CCGC's workplan. We know of no other legal authority that would provide the Executive Officer with the authority to mandate that the CCGC must provide the Central Coast Water Board with copies of individual notification letters.

³ The CCGC does not discuss here if the Central Coast Water Board or the State Board could require such notification as part of a Conditional Waiver, and in fact the CCGC questions if such a requirement could be made. Regardless, the CCGC focuses its current comments here on the fact that such notification is *not* required under the Conditional Waiver as adopted, or as amended by the State Board.

C. CCGC's Understanding of December 17, 2013, Conditions And Sufficiency of Current Reporting Requirements

The CCGC believes it important to clarify its understanding of the terms and conditions contained in the December 17, 2013 approval letter. During the approval process, CCGC representatives had several conversations with Central Coast Water Board staff regarding the terms of approval. In fact, in an earlier draft version of the approval letter, staff proposed to automatically require all individual notification letters. After hearing concerns expressed by CCGC representatives as to why such a requirement was not appropriate, Central Coast Water Board staff changed the language to include the term "upon request." Based on the tenor of conversations at the time, CCGC representatives understood this to mean that such notification letters could be requested by Central Coast Water Board staff for review and verification, but did not believe that it meant Central Coast Water Board staff could wait several months and then just request all notification letters for no apparent reason. Otherwise, why would staff have included the terms "upon request" after hearing and understanding the CCGC's concerns, and understanding one of the central tenants of the CCGC's program includes not providing individual member information that specifically ties domestic well exceedances with individual growers, companies, or landowners in a manner that would then be public.

Further, the CCGC fails to see how copies of individual notification letters provides the Central Coast Water Board with any more information than that which is already being provided. At this time, the CCGC provides the Central Coast Water Board with a template of the notification letter, sample results, the date the notification packets are mailed to members, as well as the delivery confirmation date if the well is a domestic well with an exceedance of the nitrate drinking water standard. All of this information combined, along with the ability of staff to review CCGC program documents at anytime, clearly provides an appropriate level of reporting that ensures that agricultural order objectives and purposes are being achieved.

III. Direct Grower Information Related to Follow-up Actions

In recent communications, Central Coast Water Board staff have indicated that they intend to require the CCGC to provide them with individual grower information related to follow-up actions taken if a domestic well had an exceedance of the nitrate drinking water standard. Their reasoning for such a requirement is primarily that they believe they need to have the third-party program provide reporting equivalent to the individual program. However, such a reason does not constitute legal authority and, further, inclusion of this requirement in the individual program does not make it legal either. Similar to our concerns expressed above, the CCGC does not believe it appropriate or legal for Central Coast Water Board staff to mandate that the CCGC provide this information.

First, the CCGC's request for follow-up action from its members is not required by any order, was not included in the CCGC's workplan, and this information was obtained solely for the purpose of providing the Central Coast Water Board with additional information to illustrate that CCGC members are taking appropriate actions to protect public health. There is no existing

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legal mandate that provides the Central Coast Water Board with authority to request such information from individuals, or from the CCGC on behalf of its members. The Central Coast Water Board's authority associated with mandating replacement water, or in this case mandating reporting of follow-up actions, is limited to the authority given to it under Water Code section 13304. Unless the Central Coast Water Board brings a clean up and abatement order and can show that the grower in question is a responsible party for creating a condition of pollution or nuisance, no other authority exists for it to mandate that growers and/or landowners take follow-up actions. While the CCGC and its members recognize that it is imperative for public health purposes that such actions occur, and in fact the CCGC is able to show that all its members have taken appropriate action to ensure that users of the domestic well in question are provided with safe drinking water, doing the "right thing" does not equate to legal authorization for mandating that individuals report on the "right thing" that was done voluntarily.

Further, Central Coast Water Board staff look to create "new" liability for failing to report follow-up actions, when in fact such action cannot be mandated unless a clean up and abatement order is issued. For example, to require this information from individuals, or the CCGC on behalf of its members, the Central Coast Water Board would need to rely on Water Code section 13267. Assuming *arguendo* that 13267 would even apply to this information since it is not related to investigating the quality of water of the state, any person failing to report information once requested under Water Code section 13267 is guilty of a misdemeanor and may be liable civilly. (Wat. Code, § 13268.) Under this scenario, a grower or landowner that fails to report its voluntary follow-up action could be held civilly liable. The CCGC contends that such a result seems contrary to the rules of general fairness. Moreover, such a result would greatly disincentivize voluntary actions that are being taken to further public health.

Second, the December 17, 2013 letter itself only requests that the CCGC provide a summary of follow-up actions taken by its members. Nowhere does the December 17, 2013 letter state that the CCGC must provide a list of individual members with identification of specific follow-up actions taken by individuals. With respect to requiring a list of Coalition members that have not provided follow-up action information or who have not taken follow-up actions, the CCGC contends that release of such information is inappropriate because all of this information is being provided voluntarily. Further, and for the same legal reasons discussed above, there is no legal authority for the Central Coast Water Board to mandate that the CCGC provide this information.

IV. The CCGC's Proposed Next Steps

Even though the CCGC contends that the Central Coast Water Board cannot mandate reporting of the type of information identified, the CCGC does propose the following actions in an effort to cooperate with the Central Coast Water Board and to further the purposes and objectives of the agricultural orders.

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1. The CCGC, as already stated, is willing to provide Central Coast Water Board staff the opportunity to review and audit all information submitted to the CCGC at the CCGC's home offices, or at another location agreed upon by the parties. Central Coast Water Board staff may not copy or take with them confidential documents, but they may review and audit the documents to verify the authenticity of the information provided to them from the CCGC.

2. The CCGC is willing to add a penalty of perjury statement to all of its submittals to the Central Coast Water Board. Although the CCGC contends that all information submitted is accurate and true to the best of its knowledge, the CCGC is willing to take the extra step and submit information that is currently being reported accompanied with the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel or represented Members properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment for violations.

3. The CCGC will work directly with the various county health departments to provide them with the appropriate level of information that is needed to ensure protection of public health.

The CCGC believes that the proposed additional actions described above provide the Central Coast Water Board with more than sufficient information to ensure that program objectives are being met. To reiterate, the CCGC clearly states that it is not willing to provide the Central Coast Water Board with copies of individual notification letters, nor with individual follow-up action information. However, the CCGC Board of Directors has recently determined it appropriate to survey its membership to see if they are willing to have the CCGC convey similar individual information in a table format that identifies individuals only by their CCGC field point name if they are in the north, and by their global identification number if they are in the south. Examples of the table formats are provided for discussion purposes only. (Attachment 1.)

It is imperative that the Central Coast Water Board clearly understands that the CCGC is not willing to provide this information in the draft table format unless and until it learns from its members that they support such an approach. As indicated, we provide the draft table here only for purposes of preliminary discussions, and it does not reflect a willingness or commitment to provide the information accordingly.

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In conclusion, the CCGC has serious concerns with the Central Coast Water Board's request for individual notification letters, and individual follow-up action information. We do not believe that the legal authority exists for the Central Coast Water Board to mandate reporting of this information. Regardless, the CCGC is willing to provide Central Coast Water Board staff with an opportunity to audit all documents, and the CCGC is willing to submit its current reports and information subject to a "penalty of perjury" statement. Accordingly, the CCGC's current level of reporting, with these additional safeguards, provides the Central Coast Water Board with more than sufficient information to ensure that the purposes and objectives of the agricultural orders are met.

Please contact me at (831) 240-9533 if you have further questions.

Sincerely,



Parry Klassen
Executive Director

Attachment

cc (via email only): Tim Borel (tborel@foxyproduce.com)
Abby Taylor-Silva (abby@growershipper.com)
Hector Hernandez (hector.hernandez@waterboards.ca.gov)
John Robertson (john.robertson@waterboards.ca.gov)
Angela Schroeter (angela.schroeter@waterboards.ca.gov)
Theresa Dunham (tdunham@somachlaw.com)

Table 1. List of nitrate results from wells monitored [DATE], 2014 for Coalition monitoring ([VALLEY]).

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						
CCGC_0000	PRIW	12/Mar/2014	13	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	10/Mar/2014	26	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	12/Mar/2014	59	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	102	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	286	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	89	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	153	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	12/Mar/2014	40	Exceeds 80 Pct WQO	5/2/2014						
CCGC_0000	PRIW	11/Mar/2014	65	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	11/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	11/Mar/2014	179	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	11/Mar/2014	154	Exceeds WQO	5/2/2014	5/5/2014					
CCGC_0000	PRIW	11/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	12/Mar/2014	Non-Detect	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	32	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	96	Exceeds WQO	5/2/2014	5/3/2014					
CCGC_0000	PRIW	13/Mar/2014	124	Exceeds WQO	5/2/2014	5/3/2014					
CCGC_0000	PRIW	13/Mar/2014	19	Does not exceed WQO	5/2/2014						
CCGC_0000	PRIW	13/Mar/2014	145	Exceeds WQO	5/2/2014	5/3/2014					

CCGC Exceedance Report Replacement Water Follow Up- Submitted [DATE], 2014
Coalition Monitoring [Valley] Sample Dates: [DATE], 2014

Table 1. List of nitrate results from well monitored [DATE], 2014 for fall individual monitoring. AGIR - irrigation supply well. PRIW - domestic supply well or combination of irrigation and domestic supply. Sorted by GlobalID.

GlobalID	AW #	Field Point Class	Sample Date	Nitrate as NO3 Result (mg/L)	NO3_WQO	Notification Date	Confirmation Date*	Replacement Water Action	Date Initiated	Date Reported	User Notification Date	Manner of Notification
AGL020000000	AW0000	AGIR	1/23/2014	5	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/23/2014	2	Does not exceed WQO							
AGL020000000	AW0000	PRIW	1/23/2014	19	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/23/2014	15	Does not exceed WQO							
AGL020000000	AW0000	PRIW	1/23/2014	9	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/23/2014	6	Does not exceed WQO							
AGL020000000	AW0000	PRIW	1/23/2014	12	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/23/2014	25	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/23/2014	4	Does not exceed WQO							
AGL020000000	AW0000	AGIR	1/21/2014	112	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/21/2014	137	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/23/2014	45	Exceeds 80 Pct WQO							
AGL020000000	AW0000	AGIR	1/23/2014	97	Exceeds WQO							
AGL020000000	AW0000	PRIW	1/21/2014	420	Exceeds WQO	3/11/2014	3/12/2014					
AGL020000000	AW0000	AGIR	1/21/2014	76	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/21/2014	197	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/23/2014	231	Exceeds WQO							
AGL020000000	AW0000	PRIW	1/22/2014	58	Exceeds WQO	3/11/2014	3/12/2014					
AGL020000000	AW0000	AGIR	1/22/2014	166	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/21/2014	100	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/21/2014	324	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/20/2014	168	Exceeds WQO							
AGL020000000	AW0000	PRIW	1/20/2014	170	Exceeds WQO	3/11/2014	3/12/2014					
AGL020000000	AW0000	AGIR	1/20/2014	241	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/20/2014	94	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/20/2014	84	Exceeds WQO							
AGL020000000	AW0000	AGIR	1/20/2014	79	Exceeds WQO							

CCGC Exceedance Report Replacement Water Follow Up- Submitted [DATE], 2014
Spring Individual Monitoring Sample Dates: [DATE], 2014