

# California Regional Water Quality Control Board, Central Valley Region



Patrick Pulupa, Executive Officer  
Water Quality Program Priorities  
Fiscal Year 2021/2022

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## Permitting Programs

### NPDES Program

#### Permitting Efficiency, Consistency and Quality

USEPA has been reducing permitting resources the past several years, and the pandemic has put a further strain on staff resources, making increasing permitting efficiency a high priority. In FY 21/22 permitting efficiency will continue to be a priority along with an increased focus on permit consistency and quality. Board NPDES staff will continue to implement permit streamlining practices to ensure timely permit renewals, as well as procedures and tools to develop quality permits that consistently meet applicable requirements of the Clean Water Act and NPDES regulations.

#### Data Quality Assurance

Quality data is crucial for making sound permitting decisions. In FY 20/21 Board NPDES staff focused on implementing the USEPA's Sufficiently Sensitive Methods Rule and conducting mid-permit reviews in order to identify data quality issues early in the permit term. This effort to ensure quality data is submitted by dischargers will continue in FY 21/22.

#### CV-SALTS Program Implementation

In FY 20/21, the CV-SALTS Basin Plan amendments became effective and notices to comply will be issued to NPDES dischargers. In FY 21/22, NPDES program staff will continue to coordinate with and support CV-SALTS program staff to implement the Salt and Nitrate Control Programs in NPDES permits.

### Waste Discharge Requirements Program

#### CV-SALTS Program Implementation

Nitrate Control Program Notice to Comply letters for Priority 1 areas were sent out in May 2020 and Salt Control Program Notice to Comply letters are planned for January 2021. In FY 21/22, Waste Discharge Requirement program staff will continue to coordinate with and support CV-SALTS program staff to review Notices of Intent from dischargers to comply with the Nitrate and Salt Control Programs and implement the Nitrate and Salt Control Programs in Waste Discharge Requirements.

#### Permitting Efficiency, Consistency and Quality

In FY 21/22 permitting efficiency will continue to be a priority along with an increased focus on permit consistency and quality. Staff will continue to implement the Lean 6 Sigma tools and continue to track progress in reducing the backlog of old individual WDRs that need to be updated by developing revised WDRs or by increasing the number of dischargers that get covered under existing General Orders/Waivers.

#### Development of new Region-Wide General Orders

Staff have identified three groups of discharges that are similar in nature and make up a significant number of backlogged permits that need to be updated. The three groups include: domestic wastewater treatment plants that treat more than 100,000 gpd, nut and seed drying operations, and food processors. Each of our offices will take the lead to develop one of these General Orders. The adoption of the new General Orders will not only result in increased

regulatory consistency, but it will also significantly cut down on our permitting backlog as we enroll facilities under the new General Orders.

#### Contribute to Statewide General Order Development

As needed, provide input on the General Orders that the State Board is working on. The adoption of statewide general orders is expected to help with reducing our permitting backlog.

### Water Quality Certifications Program

#### Timely Issuance of Certifications

The water quality certifications program receives a high number of applications and has concentrated efforts on reducing the time it takes to review an application, to ensure requirements are met, and to write the final certification. A target of reviewing 95% of water quality certification applications within 30 days of receipt and issuing 95% of water quality certifications within 60 days of receiving all necessary project information is proposed for FY 21/22. Efforts to improve on timely issuance of certifications includes:

*Prioritizing Wetland and Water Quality Impact-Related Certifications:* focusing staff time on projects that have the highest potential for wetland and water quality impacts, for example, large projects, and projects located in sensitive areas. Less rigorous and less time-intensive review of simple, small projects will still result in protection of wetland resources and water quality and allow more time to focus on higher priorities.

*Workload Sharing:* the timely issuance of certifications has been significantly improved through workload sharing across the region. Workload sharing distributes projects to available staff, regardless of which office the staff is based in.

#### Conduct Target Inspections and Compliance/Enforcement Actions

The statewide water quality certification program was the subject of a state audit. One of the audit recommendations was for an increase in compliance and enforcement activities, including field inspections. Efforts to continue to reduce staff time on issuance of certifications allows increased attention to this important program area. Coordination with the storm water program compliance/enforcement staff will be used to allow for multi-program field inspections where water quality certification compliance observations are made during a multi-program inspection conducted by storm water program staff. This will better leverage resources across the two programs for the benefit of both programs. A target to inspect 10% of water quality certifications projects is proposed for FY 21/22. The remaining resources would be allocated to other compliance and enforcement actions, as needed.

#### Implement Permit Processing Improvements for Caltrans Projects

AB 1282 requires state agencies involved with permitting of Caltrans projects to identify and implement improvements to permitting and implementation of Caltrans projects. Improvements identified through this effort will be implemented by Board staff.

#### Implement New Dredge and Fill Procedures and Adapt to Federal Regulations Changes

The State Water Board adopted new procedures in April 2019 for regulation of dredge and fill projects in wetlands and other waters of the state. The new procedures specify which projects are required to be regulated, and what process Board staff must follow to review and permit projects. Staff training has been conducted to ensure the procedures are properly implemented. Additionally, changes made to Federal regulations, such as the Navigable Water

Protection Rule, have resulted in more projects needing to be permitted through the issuance of Waste Discharge Requirements rather than solely with a Water Quality Certification. This process takes significantly longer, and the program will be looking for ways to address the increased time demands while still issuing timely and protective project approvals.

## Stormwater Program

### Municipal: Renewal of Regionwide Municipal General Permit

The current Regionwide MS4 General Permit will expire in September 2021. To renew the permit, Board staff will work with permittees and interested persons to identify possible revisions to be made to the permit. Then Board staff will prepare a tentative draft permit and circulate it for public comment. The permit will then be considered for adoption by the Board.

### Construction/Caltrans: Conduct Targeted Inspections and Compliance/Enforcement Actions

A strong field presence has been successful at educating developers and contractors about the need for storm water pollution controls and in ensuring that they follow through with implementation of appropriate best management practices. A continued focus on field activities is proposed for the program. A target of 385 construction storm water field inspections is proposed. The remaining resources would be allocated to other compliance and enforcement actions, as needed.

### Industrial: Conduct Targeted Inspections and Enforcement Actions

A process to identify cases for follow-up has been developed. Some factors warranting a higher priority ranking for follow-up include documented pollutant benchmark concentration exceedances, repeated failure to submit reports, and failure to collect water quality samples. A target of 195 industrial storm water field inspections is proposed. The remaining resources would be allocated to other compliance and enforcement actions as needed.

## Planning, Monitoring, Assessment

### Planning Program

#### Basin Planning Program

CV-SALTS implementation and coordination with other Central Valley Water Board Programs and stakeholders will be the focus of the Basin Planning Program in FY21/22. Basin plan amendments will be developed to address beneficial use de-designations and State Board adoption resolution changes.

#### Triennial Review

Basin plans, once adopted, must be periodically reviewed through a public process that is conducted every three years (Triennial Review). In FY21/22, high-priority projects from the 2018 Triennial Review will continue to be implemented and the development of the 2021 Triennial Review will continue.

#### Integrated Report

Section 303(d) of the Clean Water Act requires the identification of water bodies that do not meet, or are not expected to meet, water quality standards and further require the development of a TMDL. In FY21/22, continued support for the region-wide integrated report will be prioritized.

### TMDL Development and Implementation

The proposed focus for the TMDL program in FY21/22 will be on implementation of current TMDLs and development of TMDLs and alternative control programs for mercury, nutrients, and/or other impairments prioritized in the Triennial Review process. Continued implementation of existing priority TMDL projects include mercury and pesticide TMDLs and Control Programs and the Dissolved Oxygen TMDL in the San Joaquin River.

### Delta Strategic Plan

The 2014 Delta Strategic Work Plan identifies priority projects that will improve water quality in the Sacramento-San Joaquin River Delta. The FY21/22 proposed priorities are to continue the Delta Regional Monitoring Program (RMP) monitoring efforts for pesticides/toxicity, mercury, nutrients, and constituents of emerging concern as well as continued implementation of the Delta Nutrient Research Plan.

### Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS)

#### Complete Amendment Making Targeted Revisions to the Salt and Nitrate Control Plan

In October 2019, the State Water Resources Control Board adopted a resolution to approve a Basin Plan Amendment to incorporate a Salt and Nitrate Control Program (SNCP) into both Central Valley Basin Plans. However, the resolution also directed the Central Valley Water Board to adopt an additional Basin Plan Amendment within a year of the program effective date that includes targeted revisions to several aspects of the longer-term SNCP implementation plan. A Central Valley Water Board hearing is planned for December 2020 and staff will continue efforts to move the Basin Plan Amendment through any remaining basin planning steps in FY 21/22.

#### Implementation Support – Administrative Tasks

Nitrate Control Program Notice to Comply letters for Priority 1 areas were sent out in May 2020 and Salt Control Program Notice to Comply letters are planned for January 2021. In FY 21/22, staff will continue to provide support for SNCP mailing efforts, tracking permittee information, and answering questions from other Central Valley Water Board program staff (e.g. Irrigated Lands Regulatory Program, Non-15, Confined Animals Unit etc.) and the public.

#### Implementation Support - Compliance

Activities are focused on ensuring that program requirements are met. This includes tracking program due dates, reviewing document submittals, serving as Central Valley Water Board liaisons at stakeholder implementation meetings and supporting enforcement efforts by following up with permittees that do not comply with program requirements.

#### Stakeholder Coordination and Public Outreach

Staff will continue to coordinate and participate with stakeholder activities, like Management Zone Implementation meetings, Priority and Optimization Study meetings, monthly CV-SALTS Executive Committee, and Public Education and Outreach Committee meetings. Staff will also participate in public workshops and meetings to educate stakeholders on the requirements of the SNCP.

## Surface Water Ambient Monitoring Program (SWAMP)

### Support for Delta Monitoring Efforts

Central Valley Water Board SWAMP will continue to fund a little over \$200,000 per year to support the Delta Regional Monitoring Program (RMP) efforts through statewide lab contracts that offer fish tissue, toxicity and chemistry analyses.

### Lower American River Recreational Beneficial Use Assessment

Central Valley Water Board SWAMP will continue to work in collaboration with various local stakeholder groups to investigate the elevated fecal indicator bacteria (FIB) levels in the Lower American River. The project objectives are to assess whether recreational beneficial uses are being protected, characterize seasonal and spatial trends in FIB levels, identify potential sources of fecal contamination through the use of DNA source tracking technology, and collect data to help determine if a public health risk exists.

### Sacramento Watershed Coordinated Monitoring

SWAMP has coordinated with Department of Water Resource's Northern District since 2008 to monitor water quality trends in the Sacramento Watershed and will be funding ~\$175,000 per year for the next 3 years. The program currently monitors 56 stations throughout the watershed on a quarterly basis for a variety of constituents.

### CyanoHAB Response

SWAMP staff will be working with State Board to provide monitoring support for Harmful Algal Bloom (HAB) responses in the region, as needed. This includes water sampling and in-house species identification and toxin testing.

### Data Management

SWAMP staff will continue to work with State Board staff and Central Valley Water Board Program Managers to facilitate and improve the submittal process of ambient surface water quality data to the California Environmental Data Exchange Network (CEDEN). Water quality data that support programs associated with Climate Change, the Salt and Nitrate Control Program, Nutrient Management, Basin Planning, or the 303(d)/305(b) Integrated Report are of a high priority.

## Nonpoint Source Program

### TMDL Implementation

Continued implementation of priority TMDLs.

### Implementation of NPS 5-year Plan

Implement projects that address NPS 5-Year Plan focus areas: CV-SALTS, Wildfire Response, Harmful Algal Blooms, Agriculture, Water Quality Impacts from Homelessness.

### Grant Management

Managing 319(h) grant projects continued from FY 20/21 and increasing outreach to potential grantees.

## Admin Unit

### Data Management and Quality Assurance Support

Continue to enhance and improve administrative support in the area of data management in the following four target areas:

1. Personnel reporting (PY, vacancies, Temp staff, develop dashboard)
2. ADA compliance/web accessibility
3. CIWQS
4. Fee Coordinator (Rancho Cordova)

Initial steps toward this priority began in the first quarter of FY 20/21 with the reclassification of the Rancho Cordova Management Services Technical position in the Rancho Cordova office. This reclassified position will provide data management support in addition to procurement duties.

### Impact of COVID-19 and FY 20/21 Priority Projects and Core Activities

Due to the impacts of COVID-19 and the delay in the roll-out of State Board's Master Retention Schedule we will continue to adjust FY 20/21 Priority Project milestones as needed. We anticipate our FY 20/21 priorities will carry into the next fiscal year and will be continued priority projects for FY 21/22.

### Efficiency, Consistency, and Quality

The Admin Section will continue to focus its efforts on efficiency, consistency, and quality in FY 21/22 in our core activities. As with other programs we will need to evaluate and determine the impact of COVID-19 on our core activities and business operations. Admin management and staff will continue to review and evaluate our internal processes to develop and enhance efficiency to meet the growing administrative needs of our all three offices.

## Special Permitting Programs

### Irrigated Lands Regulatory Program (ILRP)

#### Implement CV-SALTS Nitrate and Salt Control Programs

Nitrate Control Program: review Preliminary Management Zone Proposals and any Notices of Intents (NOI) for the Individual Permitting Approach. Salt Control Program – review NOIs for the conservative and alternative salinity permitting approaches. Update ILRP General Order for growers who choose to be regulated individually.

#### Drinking Water Well Monitoring

Continue to work directly with coalition members on drinking water well monitoring. Conduct new outreach to members of 3 coalitions who will initiate the monitoring in 2022 and continue existing outreach to members of 11 coalitions whose members have started their drinking water well monitoring. Staff will continue to prioritize notifications to users of impacted drinking water wells.

#### Groundwater Protection Formula, Values and Targets

Work with coalition and EJ representatives on development of groundwater protection values and bring target development process to the Board as an information item during FY21/22.

#### Surface Water Monitoring Expert Review

Bring recommendations to State Board and implement new requirements as appropriate.

### Compliance/Enforcement

Implement outreach/enforcement tools that are most effective at achieving ILRP compliance, with a recognition of potential impacts of the pandemic and wildfires. Prioritize compliance and enforcement for irrigation and nitrogen management reporting.

### Oilfield Program

#### General Order Enrollment

Enrolling dischargers, especially those currently operating under older Waste Discharge Requirements, under one of the three General Orders (GOs) for Discharges of Oil Field Produced Wastewater to Land will be a priority to ensure that discharges are properly regulated and protective of water quality.

#### Pond Closures

Staff have received many requests to close oil field produced water ponds. Staff will concentrate on closing these ponds in a manner that is protective of water quality and human health and the environment.

#### Enforcement

Staff will endeavor to pursue appropriate enforcement for oil field-related violations of the Water Code, including but not limited to violations of the Basin Plans, WDRs and GOs, and spills/leaks and other illicit discharges.

#### Underground Injection Control

Under certain conditions, aquifers within oil fields can be designated exempt from the protections of the federal Safe Drinking Water Act. This allows oil field operators to obtain project approval letters to inject fluids into these formations to enhance oil recovery and dispose of oil field wastes. The California Geologic Energy Management Division (CalGEM), State Board, and the regional boards work together to ensure the proposed exemptions are protective of water quality (i.e., that injected wastes will not migrate out of poor-quality aquifers and potentially impact aquifers that may provide a viable source of drinking water). USEPA provides final approval of exemption projects. CalGEM issues individual project approval letters to authorize injection. Board Staff's target will be to review, in a timely manner, and make recommendations on aquifer exemption applications and underground injection control project approval letters, and to ensure that the exemptions and approvals are protective of water quality.

#### Well Stimulation Activities

Senate Bill 4 (SB4) regarding well stimulation activities or "fracking" resulted in changes to the Water Code that requires operators to have a groundwater monitoring program, or an exclusion therefrom, in place prior to well stimulation activities. In conjunction with State Board, the Central Valley Water Board reviews requests for exclusions, proposed groundwater monitoring programs, and submitted groundwater monitoring reports to ensure the requirements of the Water Code are being met. Staff's target will be to provide its reviews in a timely manner.



## Land Disposal Program

### Revision of High-Priority WDRs

Waste Discharge Requirements for Title 27 facilities will continue to be revised based on: 1) 1B, 2A, and 2B threat and complexity sites; 2) sites where compliance and enforcement requirements necessitate a WDR revision; and 3) sites lacking adequate Financial Assurances.

### Shift in Compliance Oversight

Rancho Cordova permitting staff will oversee a greater share of compliance-related activities for Title 27 facilities to enable Compliance and Enforcement staff to add additional support to CV-SALTS enforcement. Permitting staff will receive the requisite internal training for this new function. Facilities that remain out of compliance will be referred to the Enforcement Program for formal enforcement.

### Title 27 Regulations Update

Resume work with State and Regional Board Land Disposal Program Managers and staff to re-initiate efforts to revise the Title 27 Regulations.

## Confined Animals Program

### CV-SALTS Implementation

Notices to comply have been issued to confined animal facilities for the Nitrate Control Program and staff will work with industry representatives to ensure facilities in Priority 1 areas participate as Management Zones are formed. Notices to comply have been drafted for the Salt Control Program mailout. Staff is working with the Central Valley Salinity Coalition as they do outreach and set fees. Staff will prioritize enforcement as necessary to ensure compliance with the notices to comply.

### Enforcement

Several Cease and Desist Orders have been issued to dairies that had significant compliance issues. Staff will prioritize compliance with these Cease and Desist Orders and potentially take additional enforcement at other dairies if similar violations occur.

### Ponds Intersecting Groundwater

Approximately 30 dairies in Merced County have been directed to determine whether their wastewater/liquid manure ponds intersect groundwater and if so, to submit a workplan to remediate the situation. Staff will continue reviewing these workplans. Additional directives may be sent to dairies in other areas of the Region where shallow groundwater occurs.

### Dairy General Order Revision

In coordination with the Central Valley Dairy Representative Monitoring Program, staff has identified areas where the Dairy General Order could be improved. Staff understand the State Water Board is reviewing a petition of the 2013 Dairy General Order. Pending their decision on the petition, staff will prioritize development of a draft order to be considered at a future Board hearing.

### Digesters and Composting

As a result of two years of grants awarded, there is a growing list of digester projects in process or planned. Staff will prioritize design reviews to ensure digester projects can meet Department of Food and Agriculture deadlines for grants. Staff participates in a Technical

Advisory Committee to review upcoming grant proposals. Staff also participates in a multi-agency workgroup to foster on-farm composting and to improve options for transport and use of composted manure by non-dairy farmers who can use the compost as a soil amendment and supplemental source of fertilizer.

## Mines Program

### Develop Permitting Strategy for Closed Mine Sites

Staff will continue developing a long-term permitting strategy for closed mine sites with financially viable Responsible Parties.

### Implement Revised Water Quality Threat Prioritization Scheme

Staff will continue ranking Central Valley Water Board mine sites using the revised water quality threat prioritization scheme. Staff will use the revised rankings to ensure that available resources are directed to sites posing the greatest water quality threat.

### Review Financial Assurances for Mine Waste Management Units

Staff will begin reviewing the financial assurances for active and closed mine waste management units to ensure each mine site has sufficient funds for closure and post-closure care and that appropriate financial assurance mechanisms are in place.

### Assess Remaining Sites with Unknown Status on Central Valley Mines Tracking List

For mines whose status remains unknown (two sites expected to be listed as of July 2021), staff will identify the current property owner, obtain access, conduct an inspection, characterize the quality of receiving waters, assess the site's potential water quality threat, and document the findings.

### Efforts on Key Sites

- *Rising Star*: Implement projects to stabilize the site with remaining trust funds.
- *Iron Mountain Mine*: Work with USEPA and other agencies to update a Memorandum of Understanding that identifies operational conditions to minimize the threat to water quality. Continue implementing the USGS contract to develop a three-dimensional mixing model of Keswick Reservoir to assist with assessing the extent of impacts from Spring Creek Debris Dam discharges and developing a long-term strategy to protect water quality and fisheries in Keswick Reservoir and the Sacramento River.
- *Mount Diablo*: Work with California State Parks to implement remedial measures at the mine site.
- *Sulphur Bank Mercury Mine*: Work with USEPA and other agencies to identify a feasible, protective remedy to address the mercury flux to Clear Lake from the mine site.
- *Walker Mine*: Oversee ARCO in its implementation of the Cleanup and Abatement Order requirements.
- *Washington Mine*: Work with the mine operator to close the historical tailings unit and partially close the Group B waste management unit. Work with the mine operator to implement a pilot study to assess the viability of an adit closure approach other than bulkhead seals.

## Cannabis Program

### Increase enrollment of potential legal cultivation sites

Increasing enrollment in the General Order through targeted enrollment enforcement, outreach and education, and coordination with local agencies is a statewide program priority. Water Code section 13260 notices to enroll will be scaled to ensure accountability. Staff will conduct outreach in priority watersheds and in the surrounding county where enrollment enforcement is occurring. Staff will continue to coordinate with local agencies to dovetail General Order enrollment and county use permit application processes.

### Pursue enforcement of illegal cultivation sites

Enforcement staff will conduct targeted enforcement within priority watersheds. Staff will also continue to conduct targeted enforcement in response to complaints and referrals from other agencies where evidence suggests potential or ongoing significant threats to water quality exist.

### Create efficiencies, improve workflow, and reduce backlog

The program's supporting managers will continue efforts to align resources with workload following 2020 staff reductions. These efforts will involve evaluating and making improvements to templates, workflow, document production, and enforcement efforts to increase program efficiency and productivity regionwide and in-line with the 2020 Executive Oversight Committee recommendations

## Forest Activities Program

### Review/Compliance/Enforcement of Timber Projects

AB 1492 requires 100% review of non-federal timber harvest plans and increased inspections. This item will continue to be a high priority, with a target of 267 inspections for FY 21/22. It is unclear at this time what obligations the program will bear with regards to the proposed adoption of the statewide vegetation permit.

### SB 901 Utilities

Staff will continue to engage the utilities while State Board develops a statewide permit. Inspections, communication, identification and implementation of best management practices, and prioritization will be focused on during FY 21/22.

### AB 1492 Requirements

Required AB 1492 annual reporting process will continue to be refined, especially as the program makes strides in data capture and ability to report details. A statewide online data system called CalTREES was launched by CAL FIRE in October 2018 and while it requires additional staff data entry and tracking, staff are able to glean project data from that system now.

### Post-fire Response

General Order enrollment, compliance and enforcement will continue to be a primary focus for FY 21/22, including data gathering related to BMPs on post-fire salvage to follow up with CAL FIRE's 2019 report.

### Federal Nonpoint Source Permit Development

The Central Valley and Lahontan Water Boards are developing a joint permit for nonpoint source activities on Federal Lands. A contract for CEQA EIR development is in place and staff

will be supporting EIR development along with conducting stakeholder outreach and tribal consultations all while drafting the final permit.

#### Board of Forestry Rulemaking

SB 901 and the Governor's Forest Management Task Force has resulted and may continue to result in various regulatory rulemaking processes. Permit streamlining is expected to be a focus in coming years. Interest in the one-stop-shop permitting model is growing again and assessing where and how streamlining can be achieved given regulatory mandates will be challenging.

#### Monitoring Activities Related to Forest Management

Staff will continue working with SB staff on achieving the long-term goal of validating and certifying the USGS methodology for scanning analysis of solid-phase extraction media for sampling of pesticides such that the method can be used across the state.

## Enforcement and Cleanup

### Compliance and Enforcement Program

#### Permitting and Compliance and Enforcement Coordination

Staff and seniors meet with Compliance and Enforcement staff on a bi-weekly basis to ascertain the status of ongoing compliance issues at facilities slated for a revision to the WDRs. Both Compliance and Enforcement and Permitting staff prepare brief pre-issue memos on potential compliance and permitting issues for facilities slated for WDR revisions. The memos are discussed at the biweekly Permitting & Compliance and Enforcement Coordination meetings attended by management and the AEO (Executive Sponsor).

#### Ensure Compliance with CV-SALTS Program

In FY 20/21, the CV-SALTS Basin Plan amendments became effective and notices to comply were issued to dischargers. Responses are expected to be received in this fiscal year FY 2020-2021, with C/E staff tracking responses in a database or spreadsheet. Responses from these 1000+ facilities will need to be distributed among multiple program's staff to review, evaluate, approve, and follow-up. In FY 21/22, Compliance and Enforcement Program staff will continue to coordinate with and support CV-SALTS program staff to implement the Salt and Nitrate Control Programs in NPDES permits.

#### Homelessness: Water Quality and Public Health

Compliance and Enforcement Program staff, with assistance from the State Board's Office of Public Participation, is continuing to engage with multiple stakeholders in the Central Valley Region including Counties, Cities, Caltrans, California Department of Fish and Wildlife, and the Central Valley Flood Control Board to form working groups to tackle homelessness efforts where similar goals can be accomplished by working cooperatively, leveraging resources, and coordinating efforts.

#### Business Rules to Ensure More Accurate Tracking of Goals and Enforcement Actions

Compliance and Enforcement staff in the Central Valley Water Board conduct inspections and issue Inspection Reports and enforcement documents like Notices of Violation (NOVs), Cleanup and Abatement Orders (CAOs), and Administrative Civil Liabilities (ACLs) in efforts to achieve compliance. To track these actions and documents, staff update corresponding databases such as the California Integrated Water Quality System (CIWQS); the California

Stormwater Multiple Applications and Report Tracking System (SMARTS); and GeoTracker. While there are some guidance documents for uploading and tracking some enforcement actions, a priority for the 2021-2022 Fiscal Year is to ensure that there are guidance documents (or “Business Rules”) that address all entries to the databases and that the uses of these Business Rules is consistent among program staff. Program staff will continue to keep the key databases up to date while working to update guidance documents.

### Site Cleanup Program

*Subject to change pending assessment by incoming Program Manager after consultation with the Board’s Executive Management Group*

#### New Pollution Sources

Continue to identify new sources of contamination in our region and achieve the site cleanup goals outlined in our performance measures.

#### GIS Mapping Efforts

Continue to improve GIS mapping tools for source/site identification and institutional control tracking for constituents such as 1,2,3-TCP

#### Manage SB445 Grants

Staff are now working on 14 cases that have obtained SCAP funding.

#### Per-and Polyfluoroalkyl Substances (PFAS)

Continue to coordinate with the State Water Board on response to 13267 Orders issued to airports, landfills, metal plating facilities and POTWs with > 1.0 MGD flow.

#### Priority Cases

Advance cleanup goals at priority sites such as Aerojet-Rocketdyne, the former McClellan Air Force Base, Sacramento Rail Yards and numerous brownfield projects.

### Underground Storage Tank Program

#### Low-threat Closure Policy Review

The UST Program proposes to conduct a review of every UST case and evaluate whether individual cases meet the requirements of the State Water Board’s Low-Threat UST Case Closure Policy. The results of this review will be recorded in GeoTracker and tracked by seniors and the program manager. Cases that meet the criteria will be directed to complete the necessary steps for formal case closure. Those failing to meet the requirements of the Policy will be informed of the additional site work necessary to bring the cases to closure.

#### Priority Case Projects

The UST program will identify approximately 10 priority cases where drinking water wells may have been impacted or threatened, where contaminants pose a vapor intrusion threat, or where the case may be stalled and in need of formal enforcement. Staff will dedicate 75-200 hours on each of these cases.

#### Prompt Responses to Correspondence

In providing good customer service, the Board has a goal of responding to all correspondence within 60 days. The GeoTracker online database includes a report that tracks the time taken to respond to work plans and closure requests (but not the numerous other reports submitted).

Senior staff will review this report at least weekly and follow through with line staff to ensure reports are reviewed in a timely fashion.

#### Ensure Regular Contact with Responsible Parties

A review of stalled cases shows that, in some instances, directives have not been sent to the Responsible Parties in many years. To help ensure that site work progresses at an acceptable rate and to maintain good lines of communication, it is important that staff contact the Responsible Parties on a regular basis. The goal is that every site receive at least one case review and the Responsible Parties receive a written correspondence during the year. Using raw data taken from GeoTracker, the Program Manager will run a monthly report and inform staff of cases that have not received a written directive in the past 12 months. Senior staff will then use this information when setting monthly priorities with their staff.