

# **Point Source Control & Groundwater Protection Division FY 2023-2024 Workplan**

## Programs:

NPDES Wastewater

NPDES Stormwater

Waste Discharge to Land

Solid Waste Disposal

Underground Storage Tank/Site Cleanup/DoD

Irrigated Lands

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# 1.0 Division Introduction

The Point Source Control & Groundwater Protection Division is responsible for implementing many of the Water Board's core water quality programs that were established by state and federal law in the 1960s and 1970s to protect both ground waters and surface waters by eliminating and regulating pollutant discharges. Division Staff regulate the discharge of pollutants by issuing sets of requirements known as waste discharge requirements (WDRs) that include specific conditions, prohibitions, effluent limitations, monitoring, and plan submittals that are to be implemented by a "Discharger" for protecting or benefiting water quality.

The Division is comprised of three units: the NPDES Unit, which, under the authority of the federal Clean Water Act and in accordance with the National Pollutant Discharge Elimination System (NPDES) program, controls water pollution by regulating point sources that discharge pollutants into waters of the United States; the Groundwater Permitting Unit, which issues WDRs for discharges to land that could adversely affect groundwater quality; and the Site Cleanups Unit, which oversees the subsurface investigation and remediation of historical groundwater pollution from leaking underground storage tanks (USTs) and other poor chemical and waste handling practices that have resulted in soil and groundwater contamination. The Division also includes the Region's Irrigated Lands Regulatory Program (ILRP). This Program, which resides in the Groundwater Permitting Unit, addresses water quality impacts associated with activities on irrigated agricultural lands in the North Coast Region.

Links and other supporting information for the Point Source Control & Groundwater Protection Division can be found in Section 12.0 Supporting Information.

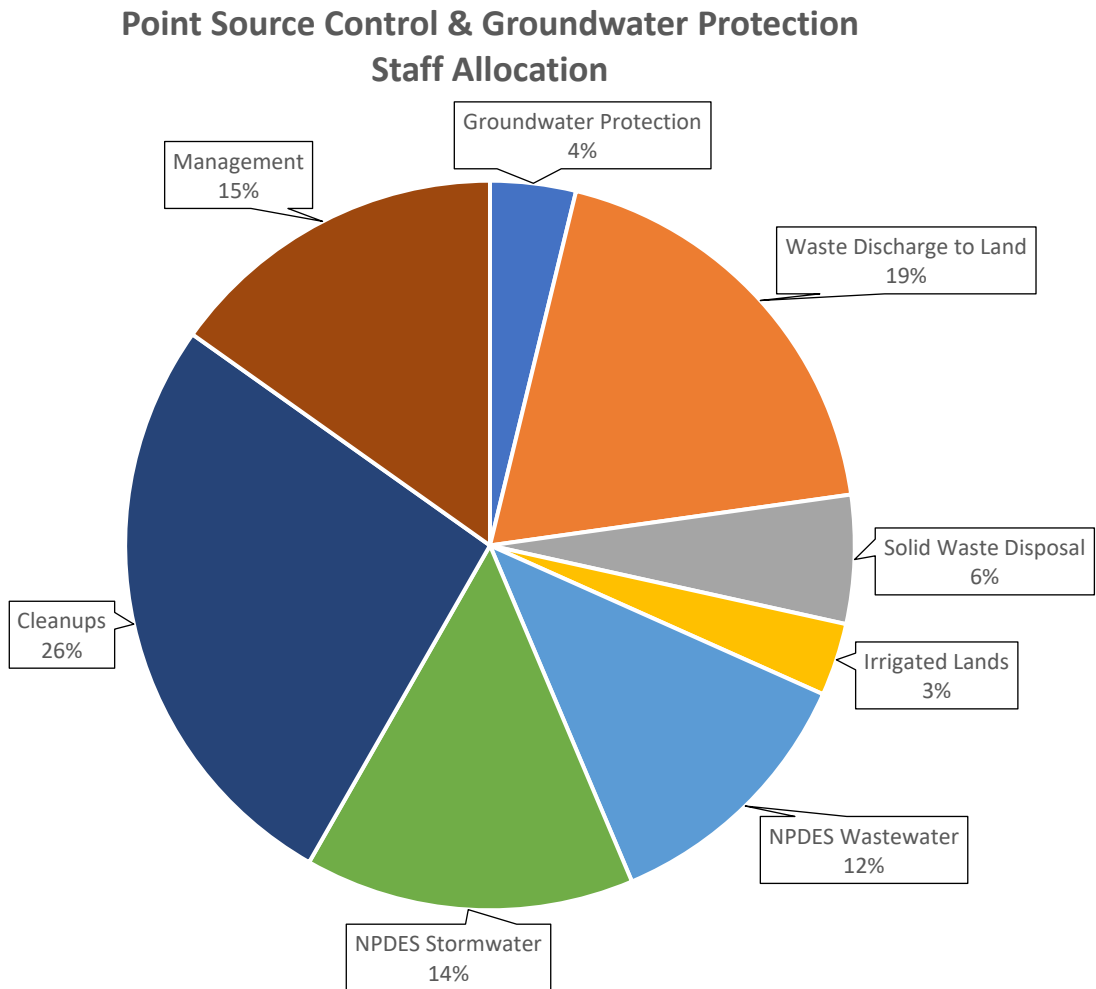
In addition to the primary programs named above, staff in this Division also dedicate time to office-wide initiatives, including the development and implementation of a Racial Equity Action Plan, development of climate change adaptation and resilience initiatives, and engagement committee initiatives.

## 2.0 Division Resources

### 2.1 Staffing

The Division consists of three units and one specialist implementing six distinct programs. Staffing for the Division is comprised of 27 professionals within the following classifications: Environmental Scientist (ES), Water Resource Control Engineer (WRCE), Engineering Geologist (EGs), Sanitary Engineering Associate (SEA), Scientific Aid and specialist and supervisory levels within these classifications. Consistent with all divisions in the office, the Point Source Control & Groundwater Protection Division receives program support from staff in the Administration Unit.

The pie chart below depicts the distribution of staff resources by program, and the subsequent sections of this workplan describe the work staff perform in each program. The “Introduction on Office-Wide Initiatives” section preceding these workplans generally describes the work of supervisors and other elements of work that are common to staff throughout the organization.



## 3.0 NPDES Wastewater Program

### 3.1 Activities and Projects

The core activities for the NPDES Wastewater Program for FY 23/24 are summarized in Table 3.1 below.

**Table 3.1 – FY 23/24 Program Activities and Projects**

Priority Level	Activity/Project	Target Completion Date
1	a. Permitting	Ongoing
1	b. Compliance Inspections	Ongoing
1	c. Case Management	Ongoing
1	d. Enforcement	Ongoing
1	e. Coordination	Ongoing
2	f. Implementation of New Policies and Regulations	Ongoing

### 3.2 Activity and Project Descriptions

#### 1.a – Permitting

**Summary:** As permit applications are received, NPDES staff prioritize and review applications, notify the applicants of the completeness of the applications, work with applicants to obtain required information, and prepare discharge-specific waste discharge requirements or enroll the discharge under an applicable general NPDES permit.

In FY 23/24, 9 permits are scheduled to be completed for Board consideration, as reflected in the milestones table below.

The process of development, review, public comment, and adoption of permits often takes more than a single year to complete. Therefore, in any given fiscal year NPDES staff will begin permit development but will not complete the draft permit within the fiscal year. For FY 23/24, the following 3 permits are expected to be under development but not completed:

- Individual NPDES Permit for the Mark West Quarry Facility, Dean Soiland, LLC
- Individual NPDES Permit for the Humboldt Sawmill that includes the Cogeneration Plant and Asphalt Plant, owned by Humboldt Sawmill Company that covers all wastewater and stormwater discharges;

- Individual NPDES Permit for the Scotia CSD; and
- General NPDES Permit for Minor NPDES Dischargers.

**Staff Allocation for FY 23/24: 1.05**

<b>Milestones</b> (New or Renewed NPDES Permits)	<b>Target Date</b> (Adoption)
Rio Dell City WWTP	Aug-23
Crescent City WWTP	Oct-23
Nordic Aquafarms	Oct-23
Eureka City WWTP	Oct-23
Fortuna City WWTP	Dec-23
Forestville WD WWTP	Feb-24
Ferndale City WWTP	Apr-24
Ukiah City WWTP	Apr-24
Graton CSD WWTP	Jun-24

**1.b - Compliance Inspections**

**Summary:** Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provide an opportunity for Regional Water Board staff to provide compliance assistance where needed. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. The Water Board’s Memorandum of Agreement with U.S. EPA specifies that minor facilities will generally be inspected once a year, as resources allow, but not less than once during the five-year permit cycle. Major facilities will generally be inspected once a year, as resources allow, but not less than once every two years. Program Staff will complete up to 8 compliance inspections in FY 23/24.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on collecting wastewater samples during inspections. To that end, additional sampling equipment has been purchased, training scheduled, and inspections planned to support staff’s capability to collect samples and conduct Type A facility compliance inspections. Type A compliance inspections are comprehensive facility inspections that include a thorough pre-inspection facility file review, a detailed on-site inspection, and collection of samples for analysis and permit compliance assessment. The other category of facility compliance inspections is the Type B inspection, which is less intensive than the Type A inspection and usually does not include sample collection.

**Staff Allocation for FY 23/24: 0.30**

### **1.c - Case Management**

**Summary:** Each NPDES Wastewater Program staff currently has assigned to them approximately 13 NPDES facilities, for which staff conduct routine case handling tasks throughout the year. Routine case handling includes self-monitoring report review and compliance determination, facility-related complaint and spill response, response to public inquiries, preparing informal enforcement actions (e.g., staff enforcement letters (SELs), Notices of Violation (NOVs)), responding to Public Records Act requests, and maintaining the Region's electronic file management system.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on providing thorough and timely reviews of special studies required by permits. The Disaster Preparedness Assessment Report and Action Plan is one special study that has been required in recent NPDES permits to assess the vulnerabilities of the wastewater treatment facility, operations, collection and discharge systems related to natural disasters and extreme weather, including sea level rise and other conditions projected by climate change science.

**Staff Allocation for FY 23/24:** 0.70

### **1.d – Enforcement**

**Summary:** Staff from the NPDES Unit works closely with the Enforcement Unit to address violations at permitted sites including completion of Administrative Civil Liability Complaints (ACLs) for discretionary permit violations, and Expedited Payment Letters (EPLs)/ACLs for permit violations subject to mandatory minimum penalties (MMPs) under Water Code section 13385. Resolving these violations has been a priority over the last year and will continue to be in this fiscal year workplan.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Initiating progressive enforcement for non-compliance such as late report submittals, minor spills, and lack of documentation.
2. Timely review of self-monitoring reports to ensure that Class A (serious) violations are identified and reported to the Enforcement Unit for appropriate and timely enforcement.

**Staff Allocation for FY 23/24:** 0.3

### **1.e- Coordination**

**Summary:** Program staff regularly work with facilities, State Water Board, and U.S. EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Tasks include continued participation in statewide roundtables and subcommittees, development of budget change proposals (BCPs) requesting staffing increases to support required program performance targets, development of template permit



language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, California Coastal Commission, and U.S. EPA.

**Key Issues and Considerations:** In FY 23/24, Staff will continue to collaborate with other units including the Groundwater Permitting and Planning units to incorporate regulatory requirements into NPDES permits. Staff will work with Groundwater Permitting Unit staff to provide cross training and add consistency in wastewater permitting, inspection, and enforcement.

**Staff Allocation for FY 23/24:** 0.15

## **2.f - Implementation of New Policies and Regulations**

**Summary:** It is important for staff to be engaged in the review, development, implementation, and interpretation of new and developing areas of policy and regulation. Many of these efforts are led by the State Water Board for US EPA but require the involvement and perspective of regional board staff to support implementation. Once these policies and regulations are adopted, they need to be integrated into permitting actions and incorporated into policies and practices within the region.

**Key Issues and Considerations:** In FY 23/24, Staff anticipates engaging in new policy areas and the implementation of new regulations. These will include:

1. Enclosed Bays and Estuaries Policy implementation- The interpretation of the existing policy and any future revision to the Enclosed Bays and Estuaries Policy would have significant impacts on many of the facilities within the region. The necessary coordination with the State Water Board as well as the potentially impacted facilities will be an important priority for staff in the coming years.
2. New Toxicity Provisions- US EPA approved the toxicity provisions for inland surface waters on May 1, 2023. These provisions will be implemented through NPDES permits throughout the region. This will require staff to engage in additional case management and compliance support roles. Staff may need to be involved in the development of similar provisions for ocean dischargers as they are drafted, reviewed, and adopted.
3. Implementation of the new General WDRs for Sanitary Sewer Systems- This newly adopted general order will have impacts on all sanitary sewer systems throughout the state. Staff will have a role in the education and compliance support of facility operators as well as monitoring compliance with this new order.
4. Monitoring and reporting of per-and polyfluoroalkyl substances (PFAS)- As a pollutant of emerging concern PFAS and the required monitoring and treatment requirements will have direct implications to permitting actions and facility requirements throughout the region.

5. Federal Pretreatment Program requirements- Staff will be directly involved in inspection and compliance assessment of facility’s pretreatment programs as well be in coordination with Sate Board.
6. Evaluation of hydraulic connectivity- Recent legal and technical findings related to hydraulic connectivity between surface and groundwater may have direct impacts on facilities within the region. These findings may require technical studies and evaluation as well as changes to regulatory mechanisms and permit requirements.

**Staff Allocation for FY 23/24:** 0.15

### 3.3 Performance Targets

Performance targets are set by U.S. EPA for the NPDES Program through the State Water Board’s annual work plan (Clean Water Act section 106 Work Plan). Achievement of performance targets is tracked by the State Water Board and published on the State Water Board webpage.

In addition to the below EPA-established targets, the Regional Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 3.3.1 – NPDES Wastewater Performance Targets and Metrics**

<b>Category</b>	<b>Requirement (per EPA 106 Workplan)</b>	<b>Region Specific Info</b>	<b>RB1 Target</b>
Permitting	Maintained 83% unexpired, if not met must achieve 20% per year	39 Facilities Total (12 Major, 22 Minor, 1 MS4, 4 RB1 GO), 8 expired as of July 1, 2023 (79% unexpired)	8
Major Facility Inspections	Conduct a compliance inspection for major permittees at least once every two years.	12 Major Facilities, 4 due for inspection as of July 1, 2023 (Arcata, Crescent City, Ukiah, Fortuna). 50% would be 6 inspections.	6

<b>Category</b>	<b>Requirement (per EPA 106 Workplan)</b>	<b>Region Specific Info</b>	<b>RB1 Target</b>
Minor Facility Inspections	Conduct a compliance inspection for minor permittees at least once every five years.	22 Major Facilities, 3 due for inspection as of July 1, 2023 (DG Fairhaven, North Fork Lumber Co, Ferndale, Bodega Marine Lab). 20% would be 5 inspections.	5
Sanitary Sewer System Inspections	Inspect at least five percent of sanitary sewage collection systems subject to Order No. 2006-0003-DWQ and the Clean Water Act each year.	All Facilities, both Major and Minor, 34 total. 5% would be 2 inspections.	2
Pretreatment Program	Conduct one Pretreatment Compliance Audit (PCA) in each five-year permit term of all approved active POTW Pretreatment programs.	4 Facilities total (Santa Rosa, Eureka, Crecent City, Arcata)	1
Pretreatment Program	Conduct at least two Pretreatment Compliance Inspections (PCI) during each five-year permit term on all approved active POTW Pretreatment programs.	4 Facilities total (Santa Rosa, Eureka, Crecent City, Arcata)	2

## 4.0 NPDES Municipal (MS4) Stormwater Program

### 4.1 Activities and Projects

The Region 1 stormwater program consists of three distinct programs, each staffed by one staff person. The Municipal Stormwater program includes implementation of:

- Phase 1 Municipal Separate Storm Sewer System (MS4) Permit- Implementation of the region-specific permit which includes 10 permittees;
- Phase 2 MS4- Implementation of the statewide permit which includes 11 permittees;
- Caltrans MS4 permit- Implementation of the statewide permit which includes 3 Caltrans Districts.

**Table 4.1 – FY 23/24 Municipal Stormwater Program Activities and Projects**

<b>Priority Level</b>	<b>Activity/Project</b>	<b>Target Completion Date</b>
1	a. Permitting	Ongoing
1	b. Inspection/Audits	Ongoing
1	c. Case Management	Ongoing
1	d. Enforcement	Ongoing
1	e. Coordination	Ongoing
2	f. Implementation of New Policies and Regulations	Ongoing

## 4.2 Activity and Project Descriptions

### 1.a – Permitting

**Summary:** There is one Phase I MS4 permit in the North Coast Region, Order No. R1-2015-0030. This permit regulates the discharge of pollutants from the MS4s of the City of Santa Rosa, portions of unincorporated County of Sonoma, Sonoma County Water Agency (Sonoma Water), the City of Cotati, the City of Cloverdale, the City of Healdsburg, the City of Rohnert Park, the City of Sebastopol, the City of Ukiah, and the Town of Windsor. This permit was due for reissuance in 2020.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on the development, review, public noticing, comment response, workshops, and adoption of the reissued MS4 Phase 1 Permit. This permit will cover the 9 cities within the Russian River watershed (excluding Mendocino County) as well as Sonoma Water. NPDES Stormwater Program staff plan to enroll under the Phase I MS4 Permit three existing, but currently unpermitted, entities: Sonoma Marin Area Rail Transit (SMART) Train, Sonoma State University, and Santa Rosa Junior College.

### ***MS4 Phase 1 Estimated Timeline***

<b>Milestone</b>	<b>Timeline</b>
Draft Permit	Current through Nov-23
Public Comment Period (45 days) and workshop	Nov-23- Jan-24
Board Adoption	Apr-24

**Staff Allocation for FY 23/24:** 0.35

## **1.b – Inspections/Audits**

**Summary:** A core responsibility of NPDES Storm Water Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements.

**Key Issues and Considerations:** The MS4 Program must complete Municipal inspection or program audits of 10% of all Phase 1 and Phase 2 MS4 Permittees, which would be 3 audits in FY 23/24. In addition to a physical site inspection, inspections and audits include a thorough review of the site/facility file, relevant work plans, annual reports, monitoring reports, special studies, and program documents.

**Staff Allocation for FY 23/24:** 0.10

## **1.c – Case Handling**

**Summary:** General case handling tasks include spill response, regular meetings with permittees, CEQA project review, Low Impact Development (LID) plan review, review and approval of permittee submittals through SMARTS, responding to PRA requests, providing technical guidance to permittees, and responding to public inquiries.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on providing thorough and timely review of the annual reports, workplans, special studies, TMDL compliance plans, monitoring results, and other permittee submittals. Ongoing weekly, bi-weekly, monthly, and quarterly meetings will continue with permittees to support strong partnerships.

**Staff Allocation for FY 23/24:** 0.15

## **1.d – Enforcement**

**Summary:** Informal and formal enforcement can be a necessary tool to ensure permit compliance. Audits and inspections are also used to inform areas where enforcement may be necessary. Additionally, compliance issues are brought to Staff's attention through complaints and complaint response.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Technical review on high level enforcement cases, drafting orders, providing compliance support, conducting compliance inspections, developing administrative civil liability documents, and preparing for public hearings.
2. Progressive enforcement for non-compliance such as late submittals, missing sampling, and lack of documentation.

**Staff Allocation for FY 23/24:** 0.05

### **1.e - Coordination**

**Summary:** Program staff regularly work with municipalities, State Water Board staff, and U.S. EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Tasks include continued participation in statewide roundtables and subcommittees, development of template permit language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, California Coastal Commission, and U.S. EPA.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on collaboration with other units including 401 Certification, Cannabis Regulatory, and Planning units to incorporate regulatory requirements and support compliance and complaint response. Additional work includes participation in the Region 1 workgroup to develop a Racial Equity Action Plan, participation in roundtables, subcommittees, and special projects related to pollutants of emerging concern.

**Staff Allocation for FY 23/24:** 0.05

### **2.f - Implementation of New Policies and Regulations**

**Summary:** It is important for staff to be engaged in the review, development, implementation, and interpretation of new and developing areas of policy and regulation. Many of these efforts are led by the State Water Board or US EPA but require the involvement and perspective of regional board staff to support implementation. Once these policies and regulations are adopted, they need to be integrated into permitting actions and incorporated into policies and practices within the region.

**Fiscal Year Focus:** In FY 23/24, Staff anticipates engaging in new policy areas and the implementation of new regulations. These will include:

1. Development of the new statewide Phase 2 MS4 Permit by participating with the State Board through the subcommittee on development and adoption of the new Phase 2 permit which covers 11 cities in the Region. The State Water Board's public comment period is expected to begin in spring 2024.
2. Implementation of the reissued Caltrans MS4 Permit and coordination with Caltrans and staff from other Divisions on Caltrans' TMDL Compliance Projects.
3. Education and outreach to MS4 Permittees, construction industry, and affected industries on the requirements of the Basin Plan and how to comply with the Basin Plan's numeric and narrative water quality objectives.

**Staff Allocation for FY 23/24:** 0.05

### 4.3 Performance Targets

Performance targets are set by U.S. EPA for the NPDES Program through the State Water Board’s annual work plan (Clean Water Act section 106 Work Plan).

Achievement of performance targets is tracked by the State Water Board and published on the State Water Board webpage.

In addition to the below EPA-established targets, the Regional Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 4.3.1 Municipal Stormwater Performance Targets and Metrics**

<b>Category</b>	<b>Requirement (per 106 Work Plan)</b>	<b>Region Specific Info</b>	<b>Target</b>
MS4 Audits	Perform an on-site audit for all Phase I and II permittees at least once every ten years.	24 MS4s Total (10 Phase 1, 11 Phase 2, 3 Caltrans districts), 3 past due for audit. 10% per year.	3

# 5.0 NPDES Industrial Stormwater Program

## 5.1 Activities and Projects

The Region 1 stormwater program consists of three distinct programs, each staffed by one staff person. Industrial stormwater discharges and authorized non-stormwater discharges from industrial facilities are regulated under the Statewide Storm Water Industrial General Permit, Order 2014-0057-DWQ (Industrial Stormwater General Permit or IGP). The Industrial Stormwater program implements the industrial statewide permit in Region 1, which currently covers approximately 550 industrial facilities.

**Table 5.1 – FY 23/24 Industrial Stormwater Program Activities and Projects**

Priority Level	Activity/Project	Target Completion Date
1	a. Inspection	Ongoing
1	b. SMARTS	Ongoing
1	c. Case Management	Ongoing
1	d. Enforcement	Ongoing
1	e. Coordination	Ongoing
2	f. Implementation of New Policies and Regulations	Ongoing

## 5.2 Activity and Project Descriptions

### 1.a – Inspection

**Summary:** A core responsibility of NPDES Storm Water Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements. The types of industrial facilities that are required to seek coverage under the IGP include manufacturers, landfills, mining facilities, facilities generating electricity using steam, hazardous waste facilities, transportation facilities with vehicle maintenance, large sewage and wastewater plants, solid waste recycling facilities, and oil and gas facilities. There are currently approximately 550 active facilities currently enrolled under the Industrial Stormwater General Permit in Region 1.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on sectors that are high pollutant-generating (quarries, mining operations, junk yards), facilities that have high sample results (TSS) or have an absence of sampling data, and those facilities that are required to have permit coverage but have failed to enroll under the permit (non-filers).



The Industrial Program establishes an inspection target of 10% of facilities each year, which is 55 facilities for Region 1 for FY 23/24.

Additional sampling equipment has been purchased, training scheduled, and inspections planned to support staff's capability to collect samples and conduct samples during inspections to more accurately identify non-compliance and support enforcement.

**Staff Allocation for FY 23/24:** 0.25

### **1.b – SMARTS**

**Summary:** The Stormwater Multiple Application and Report Tracking System (SMARTS) public platform enables permittees and regulators to enter, manage and view storm water data including permit registration documents, compliance, and monitoring data associated with the Industrial General Permit. SMARTS submittals such as enrollments (Notice of Intent or NOI), changes of information (COI), and terminations of coverage (Notice of Termination or NOT) occur throughout the year and must be reviewed, the site inspected, and the action approved.

**Key Issues and Considerations:** With over 550 active facilities regulated under the Industrial General Permit across the Region it is necessary to prioritize inspection, review, and enforcement. Criteria that must be considered to prioritize inspections and enforcement include risk level, location, past noncompliance, missing reporting and sampling data, and sampling exceedances. The Industrial Stormwater Program will continue to use the data within SMARTS to prioritize inspection, identify noncompliance, issue informal and formal enforcement, and gather information on facilities compliance.

**Staff Allocation for FY 23/24:** 0.10

### **1.c – Case Handling**

**Summary:** General case handling tasks include spill response, regular meetings with permittees, reviewing and approving submittals through SMARTS, responding to PRA requests, providing technical guidance to permittees, and responding to public inquiries.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on engagement with industrial facilities regionwide to support proper enrollment, monitoring, swift implementation, and overall compliance.

**Staff Allocation for FY 23/24:** 0.25

### **1.d – Enforcement**

**Summary:** Informal and formal enforcement can be a necessary tool to ensure permit compliance. Inspections, complaints, and reviews of SMARTS submittals are used to inform areas where enforcement may be necessary.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Preparing and reviewing progressive enforcement documents including drafting enforcement orders, providing compliance support, conducting inspections, developing administrative civil liability documents, and preparing for public hearings.
2. Progressive enforcement for non-compliance such as late submittals, missing sampling, and lack of documentation.

**Staff Allocation for FY 23/24:** 0.35

### **1.e - Coordination**

**Summary:** Program staff regularly work with facilities, State Water Board, and U.S. EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Tasks include continued participation in statewide roundtables and subcommittees, development of template permit language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, California Coastal Commission, and U.S. EPA

**Key Issues and Considerations:** In FY 23/24, Staff will focus on collaboration with other units including the Enforcement, Groundwater Permitting, and Planning units to incorporate regulatory requirements, support facility compliance, complaint response, and identify non-filers for possible enforcement.

**Staff Allocation for FY 23/24:** 0.05

### **2.f - Implementation of New Policies and Regulations**

**Summary:** It is important for staff to be engaged in the review, development, implementation, and interpretation of new and developing areas of policy and regulation. Many of these efforts are led by State Water Board staff or US EPA but require the involvement and perspective of regional board staff to support implementation. Once these policies and regulations are adopted, Regional Water Board staff integrate enforceable requirements into permitting actions and practices within the region.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on engaging in new policy areas and implementing anticipated new regulations. These will include:

1. Assisting in the development of the reissued Industrial General Permit through Staff's participation in the State Board's Industrial General Permit subcommittee tasked with drafting new language for the Industrial General Permit.
2. Conducting outreach and education on Basin Plan requirements applicable to operators of industrial facilities regulated under the Industrial General Permit.

**Staff Allocation for FY 23/24:** 0.05

### **5.3 Performance Targets**

Performance targets are set by U.S. EPA for the NPDES Program through the State Water Board's annual work plan (Clean Water Act section 106 Work Plan).

Achievement of performance targets is tracked by the State Water Board and published on the State Water Board webpage.

In addition to the below EPA-established targets, the Regional Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 5.3.1 Industrial Stormwater Performance Targets and Metrics**

<b>Category</b>	<b>Requirement (per 106)</b>	<b>Region Specific Info</b>	<b>Target</b>
IGP Inspection	Inspect at least 10 percent of industrial stormwater permittees.	549 active IGP facilities as of 3/28/2023	55

## 6.0 NPDES Construction Stormwater Program

### 6.1 Activities and Projects

The Region 1 stormwater program consists of three distinct programs, each staffed by one staff person. The Construction Stormwater Staff implement the construction statewide permit which includes approximately 300 active construction sites.

**Table 6.1 – FY 23/24 Construction Stormwater Program Activities and Projects**

Priority Level	Activity/Project	Target Completion Date
1	a. Inspection	Ongoing
1	b. SMARTS	Ongoing
1	c. Case Management	Ongoing
1	d. Enforcement	Ongoing
1	e. Coordination	Ongoing
2	f. Implementation of New Policies and Regulations	Ongoing

### 6.2 Activity and Project Descriptions

#### 1.a – Inspection

**Summary:** A core responsibility of NPDES Storm Water Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements. Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the Construction Stormwater Permit. There are currently approximately 300 active construction sites currently enrolled under the Construction Stormwater Permit in Region 1.

**Key Issues and Considerations:** With nearly 300 active construction sites regulated under the Construction Stormwater Permit across the Region, it is necessary to prioritize inspection, review, and enforcement. Criteria that must be considered to prioritize inspections and enforcement include site risk level, location, past non-compliance, missing reporting and sampling data, and sampling exceedances. The Stormwater Construction Program establishes an inspection target of 10% of facilities each year, which is approximately 30 facilities for Region 1 for FY 23/24.

Additional sampling equipment has been purchased, training scheduled, and inspections planned to support staff's capability to collect samples and conduct samples during inspections and accurately identify non-compliance and support enforcement.

**Staff Allocation for FY 23/24:** 0.25

### **1.b – SMARTS**

**Summary:** The SMARTS public platform enables permittees and regulators to enter, manage and view storm water data including permit registration documents, compliance, and monitoring data associated with Construction General Permit. SMARTS submittals such as enrollments (Notice of Intent or NOI), change of information (COI), and terminations of coverage (Notice of Termination or NOT) under the statewide Construction General Permit occur throughout the year and must be reviewed, the site inspected, and the action approved.

**Key Issues and Considerations:** The Construction Stormwater Program will focus on using SMARTS data to prioritize inspection, identify noncompliance, issue informal and formal enforcement, and gather information on facilities compliance.

**Staff Allocation for FY 23/24:** 0.10

### **1.c – Case Handling**

**Summary:** General case handling tasks include spill response, regular meetings with permittees, reviewing and approving submittals through SMARTS, responding to PRA requests, providing technical guidance to contractors, owners, stormwater professionals, and responding to public inquiries.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on engaging with operators at construction sites to support proper enrollment, monitoring, SWPPP implementation, and overall compliance.

**Staff Allocation for FY 23/24:** 0.35

### **1.d – Enforcement**

**Summary:** Informal and formal enforcement can be a necessary tool to ensure permit compliance. Inspections, complaints, and reviews of SMARTS submittals are used to inform areas where enforcement may be necessary.

**Considerations and Key Issues:** In FY 23/24, Staff will focus on:

1. Preparing and reviewing progressive enforcement documents including drafting enforcement orders, providing compliance support, conducting inspections, developing administrative civil liability documents, and preparing for public hearings.

2. Progressive enforcement for non-compliance such as late submittals, missing sampling, and lack of documentation

**Staff Allocation for FY 23/24:** 0.35

### **1.e - Coordination**

**Summary:** Program staff regularly work with municipalities, contractors, stormwater professionals, State Water Board, and U.S. EPA to prioritize work, develop and implement new technical requirements and policies, and develop technical and policy understanding to improve compliance support. Tasks include continued participation in statewide roundtables and subcommittees, development of template permit language to reflect new policy changes, and coordination with sister agencies such as Division of Drinking Water, Division of Financial Assistance, Environmental Laboratory Accreditation Program, California Coastal Commission, and U.S. EPA

**Key Issues and Considerations:** In FY 23/24, Staff will focus on collaboration with other units including the Enforcement, 401 Certification, Cannabis Regulation, and Planning units to incorporate Construction Stormwater requirements and objectives into joint regulatory actions, support site compliance, and support complaint response.

**Staff Allocation for FY 23/24:** 0.05

### **2.f - Implementation of New Policies and Regulations**

**Summary:** It is important for staff to be engaged in the review, development, implementation, and interpretation of new and developing areas of policy and regulation. Many of these efforts are led by State Water Board staff or US EPA but require the involvement and perspective of regional board staff to support implementation. Once these policies and regulations are adopted, Regional Water Board staff integrate enforceable requirements into permitting actions and practices within the region.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on engaging in new policy areas and implementing anticipated new regulations. These will include:

1. Implementing the reissued Construction General Permit, which becomes effective in September 2023. By design, the current General Permit will remain in effect for all sites enrolled for coverage prior to the effective date of the new order until September 2025. Effectively, there will be two permits and regulatory programs in play for these two years. Managing implementation of the two permits simultaneously will take considerable Staff oversight, collaboration, training, and document review.
2. Initiating regulation under the Low Threat NPDES General Permit for construction site dewatering and the discharge of impounded stormwater.

3. Conducting outreach and education on Basin Plan requirements applicable to industrial facilities regulated under the Construction General Permit

**Staff Allocation for FY 23/24:** 0.05

### 6.3 Performance Targets

Performance targets are set by U.S. EPA for the NPDES Program through the State Water Board’s annual work plan (Clean Water Act section 106 Work Plan).

Achievement of performance targets is tracked by the State Water Board and published on the State Water Board webpage.

In addition to the below EPA-established targets, the Regional Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 6.3.1 Construction Stormwater Performance Targets and Metrics**

<b>Category</b>	<b>Requirement (per 106)</b>	<b>Region Specific Info</b>	<b>Target</b>
CGP Inspection	Inspect at least 10 percent each year of permitted construction sites covering more than five acres.	177 CGP sites over 5 acres as of 3/28/2023	18
CGP Inspection	Inspect at least five percent of permitted construction sites covering less than five acres.	115 CGP sites less than 5 acres as of 3/28/2023	6

# 7.0 Waste Discharge to Land Program

## 7.1 Activities and Projects by Priority

The core activities for the Waste Discharge to Land Program for FY 23/24 are summarized in Table 7.1 below.

**Table 7.1 – FY 23/24 Program Activities and Projects by Priority**

Priority Level	Activity/Project	Target Completion Date
1	a. Permitting	Ongoing
1	b. Inspecting	Ongoing
1	c. Enforcement	Ongoing
1	d. SMR Review	Ongoing
1	e. Data Entry, Case Handling, Other	Ongoing
2	f. Special Projects	Ongoing

## 7.2 Activity and Project Descriptions

### 1.a – Permitting

**Individual WDRs:** As permit applications are received, Groundwater Permitting staff prioritizes and reviews applications, notifies the applicants of the completeness of the applications, works with applicants to obtain required information, and prepares waste discharge requirements based on complete applications. WDRs can also become dated and in need of substantial revisions. For FY 23/24, permitting staff will revise four WDRs and begin work on four more that will likely be completed in FY 24/25.

**Enrollments:** Compared to individual WDRs, general WDRs have more streamlined monitoring and reporting requirements and are more up to date with current regulatory requirements. In order to focus on reducing the backlog of outdated individual WDRs, unit staff will focus on new enrollments into general WDRs and enrolling outdated individual WDRs into more up to date general orders. This shift from individual permits to general enrollments changes Unit staff’s focus to long-term case management and facility oversight as opposed to individual permit adoption.

The number of enrollments completed during any fiscal year is highly unpredictable because it is dependent on the number of new applications received during the fiscal year and the status of newly adopted or revised general permits. For example, more than 500 unregulated wineries could submit applications for enrollment under the new Winery Order. However, the unit lacks additional staff resources to handle this influx of



applications, and instead must manage the incoming applications with their existing workload. Therefore, for FY 23/24, Staff have established a target of 25 enrollments, in line with previous years.

Where regulation of a facility is transferred from individual WDRs to coverage under general WDRs, the individual WDRs must be rescinded by the Regional Water Board at a public hearing. For FY 23/24, Staff will develop a Board Order rescinding WDRs for dischargers whose permit coverage has been transferred to a general WDR and for dischargers that no longer require permit coverage.

**Staff Allocation for FY 23/24: 1.0**

<b>Milestones</b>	<b>Target Date</b>
Willow Creek CSD WWTP	Dec-23
Keysight Technologies	Apr-24
Roseburg Forest Products	Apr-24
City of Dorris WWTP	Jun-24
Complete 25 Enrollments	Jun-24
Multi-Party Rescission Order	Jun-24

**1.b-d. – SMR Review, Inspecting, and Enforcement**

**Summary:** Self-monitoring report (SMR) review, inspections, and enforcement are all part of a broader effort to achieve regulatory compliance. SMR review and inspections assess compliance and where compliance is lacking, informal and formal enforcement can begin.

**SMR Review:** Progressive enforcement hinges on the ability of staff to detect permit violations. Without the ability to monitor all facilities continuously, staff rely on SMRs submitted by regulated facilities to document their compliance with waste discharge requirements each month or quarterly in accordance with the facility’s monitoring and reporting program. Most facilities also submit an annual report that summarizes the preceding year’s monitoring data and compliance status. Groundwater Permitting Unit staff review SMRs to determine compliance with waste discharge requirements. Staff follow up may be required to address missing, unclear information or other reporting problems, or to address permit violations.

In FY 22/23, staff conducted a review of all facilities regulated by the WDR program from July 1, 2018 to March 31, 2023 to determine SMR submittal and review rates. Staff found that over 90 facilities did not submit any required SMRs and another 30 submitted less than 20% of the required SMRs. About half of all required SMRs remain unsubmitted. Of those SMRs that were submitted, about half were never reviewed. Staff will undertake a project in FY 23/24 to initiate progressive enforcement on all facilities regularly neglecting to submit SMRs. As a companion project, staff will also prioritize SMR review across all facilities based on the facility’s threat to water quality.

**Inspecting:** Routine compliance inspections are another important tool in progressive enforcement. These inspections ensure that submitted SMRs accurately reflect conditions at the facility and enable staff to detect issues that may not be required to be reported in SMRs. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, it is the Groundwater Permitting Unit’s goal to visit each municipal wastewater treatment facility every three to four years, or more frequently for facilities with higher Threat to Water Quality/Complexity ratings. Other regulated facilities, such as wineries, campgrounds, and mobile home parks, are inspected on a less frequent basis.

**Enforcement:** Finally, informal and formal enforcement close the loop on the principle of progressive enforcement described in the State Water Board’s Water Quality Enforcement Policy. Informal enforcement consists of (documented) verbal warnings to dischargers when minor and infrequent violations occur; Staff Enforcement Letters when more serious or more frequent violations occur; and Notices of Violation when formal enforcement would be the next step if compliance is not achieved. Formal enforcement consists of Notices to Comply when a violation is considered “minor” according to California Water Code section 13399 *et seq.*; Cleanup and Abatement Orders; Cease and Desist Orders; Time Schedule Orders; WDR Rescissions; and Administrative Civil Liabilities. Formal enforcement sets the firm expectation that the actions required by the Regional Board will be taken and attaches the threat of monetary penalties if they are not.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Collecting wastewater samples during inspections. To that end, WDR staff will coordinate with NPDES staff to share sampling equipment, participate in training, and conduct inspections to build staff’s capability to collect samples and conduct Type A facility compliance inspections.
2. Initiating progressive enforcement for non-compliance such as late report submittals, minor discharges to land in wet weather, and lack of documentation.
3. Timely review of self-monitoring reports to ensure that Class A (serious) violations are identified and reported to the Enforcement Unit for appropriate and timely enforcement.

**Staff Allocation for FY 23/24: 2.25**

<b>Milestones</b>	<b>Target Date</b>
Issue ~100 SELs or NOVs for chronic SMR non-submittal	Dec-23
Conduct 28 Compliance Inspections	Jun-24

Milestones	Target Date
Review 120 SMRs	Jun-24

### 1.e – Data Entry, Case Handling, Other

**Summary:** Groundwater Permitting Unit staff regularly communicate with representatives of regulated facilities regarding permit compliance, response to facility-related complaints, questions about monitoring and reporting requirements, and other discharger concerns. Approximately 600 facilities are assigned to unit staff, which results in hundreds of compliance assistance communications on an annual basis.

State Water Board staff often enlists the input of the Regional Water Boards on emerging issues and development of statewide waste discharge requirements. In FY 23/24, Groundwater Permitting Unit staff will continue engaging in statewide programmatic WDR roundtable meetings and their associated subcommittees (e.g., GeoTracker working group and the SB 1215 wastewater consolidation subcommittee) to assess and resolve common regulatory and data management challenges, ensure statewide consistency, address region specific issues, and develop guidance on new and emerging regulations.

The Groundwater Permitting Unit will also continue its efforts providing technical and compliance assistance to DACs to advance the Human Right to Water and to improve access to public funding for wastewater treatment and disposal projects. Unit staff is currently assisting over 40 local agencies that have applied for public funding assistance through the California Clean Water State Revolving Fund (Small Community Grant Program).

Also included in this category is the staff review of Local Area Management Programs for the regulation of OWTS.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Providing thorough and timely reviews of special studies required by permits
2. Providing assistance to DACs to seek and secure public funding for needed water and wastewater infrastructure projects
3. Conducting outreach to Tribal communities, DACs, and other affected community stakeholders pursuant to AB 2108.

**Staff Allocation for FY 23/24: 0.75**

### 2.f – Special Projects

**Summary:** WDR Program staff are frequently asked to support the development and implementation of high priority regional projects, such as irrigated lands regulatory program (ILRP) tasks and programmatic improvements. The ILRP tasks are described in more detail in Section 10 and briefly summarized here.

**Russian River TMDL Implementation:** The State Water Board is expected to approve the Russian River Watershed Pathogen TMDL in FY 23/24. Early implementation of the Action Plan is ongoing and will transition into implementation once adoption occurs. This work includes public outreach to owners of onsite waste treatment systems (OWTS) in the lower Russian River area and coordination with local agencies and other stakeholders identified as implementing entities in the TMDL Action Plan. Groundwater Permitting Unit staff will begin preparing the Regional Water Board OWTS Assessment Program. The OWTS Assessment Program is a resource intensive effort to assess the operational status of OWTS in over 45,000 parcels in the Watershed during the first phase of the Program.

**Monte Rio & Villa Grande Wastewater Project:** The Monte Rio & Villa Grande (MRVG) Wastewater Project was started as a community solution to identify and implement appropriate wastewater conveyance and/or treatment solutions that comply with the requirements of the Russian River Watershed Pathogen TMDL. Parties of interest working on the project include the Regional Water Board, several local agencies, and a community advisory group. The project is currently in the planning phase. A consultant has been hired to produce a preliminary engineering report that analyzes the feasibility of several alternatives. The report is expected to be completed early in the summer of 2024. After the report is completed, a construction grant application will be submitted to implement the selected alternative(s).

**Community Needs Assessment:** Consistent with the objectives of the Wastewater Consolidation Program, established pursuant to SB 1215 and codified in the Water Code, staff will be finalizing a Needs Assessment Work Plan that will identify water quality and infrastructure needs of North Coast Region, especially for communities that are disadvantaged or severely disadvantaged. The goal for the Needs Assessment is to develop a specific inventory of needed water quality improvement upgrades, repairs, replacements and new capital infrastructure. This inventory would specify funding allotments and, for wastewater improvement needs, include conceptual scoping and preliminary cost estimates for the needed upgrades, repairs, replacements or new capital infrastructure. In FY 23/24, staff will be conducting interviews with wastewater operators, community and Tribal groups, and other local leaders to assess community needs and assist the communities to prepare the document necessary to apply for and secure public funding for projects.

**Irrigated Lands Support; Vineyards and Lily Bulbs:** The Regional Water Board is scheduled to consider adoption of the Vineyard General Order in December 2023. Once adopted, WDR program staff will be tasked with assisting the Irrigated Lands program staff in implementing the order. Staff will also support the implementation of the Smith River Plain Water Quality Management Plan (SRMP) and begin the development of a general order covering discharges of waste from lily bulb cultivation in the Smith River Plain. These projects are described in more detail in the Irrigated Lands Program Section of this document.

**Programmatic Standard Operating Procedures Development:** Staff lack access to up-to-date templates and SOP documents for routine tasks. Because of ongoing and expected staff turnover in the coming years, it is essential to document SOPs and develop document templates that are ADA compliant. Examples include: SMR review and enforcement follow up; Report of Waste Discharge review; Special Study review; Inspection planning, execution, and follow up; electronic Notice of Intent to Enroll intake; electronic content management uploads and CIWQS entry; and the development of WDR, Monitoring and Reporting Program (MRP), SEL, NOV, and SMR templates.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

- 1) Facilitating the ongoing Monte Rio & Villa Grande Wastewater Pilot Project.
- 2) Conducting robust stakeholder outreach in the Smith River Plain.
- 3) Ensuring templates are ADA compliant.

**Staff Allocation for FY 23/24: 1.0**

### 7.3 Performance Targets

In FY 23/24 WDR program staff will aim for the targets given in Table 7.4. This table is unusual for the WDR program in that it specifies a target for informal enforcement measures, i.e., Staff Enforcement Letters or Notices of Violation. This is because staff have already identified the facilities that will receive these sanctions and all that remains is to develop and distribute the enforcement documents. Table 7.4 also does not include any potential SMR reviews, enrollments, inspections, or orders potentially contributed by the Groundwater Permitting Unit’s scientific aid. As always, these targets are subject to change based on unexpected events and changes in priorities.

In addition to the below State Water Board-established program targets for WDR adoptions and compliance inspections, the Regional Water Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 7.4 – Performance Targets for FY 23/24**

<b>Rescission Orders</b>	<b>GWDRs and Waiver Enrollments</b>	<b>WDRs Adoptions</b>	<b>Compliance Inspections</b>	<b>SMR Review</b>	<b>SEs or NOVs for chronic SMR non-submittal</b>
1	25	4	28	120	~100

# 8.0 Solid Waste Disposal Program

## 8.1 Activities and Projects by Priority

The core activities for the Solid Waste Disposal Program for FY 23/24 are summarized in Table 8.1 below.

**Table 8.1 – FY 23/24 Program Activities and Projects by Priority**

<b>Priority Level</b>	<b>Activity/Project</b>	<b>Target Completion Date</b>
1	a. Permitting	Ongoing
1	b. Inspecting	Ongoing
1	c. Enforcement	Ongoing
1	d. SMR Review	Ongoing
1	e. Data Entry, Case Handling, Other	Ongoing
2	f. Special Projects	Ongoing

## 8.2 Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3) and the letter (a, b, c, etc.) listed in Table 8.1 above.

### 1.a – Permitting

**Summary:** The Region 1 Land Disposal Program has about 60 facilities that are regulated under WDRs implementing requirements in Title 27 of the California Code of Regulations and over 150 facilities (predominantly burn dumps and inactive or abandoned mines) that are currently unregulated. Periodically, WDRs need to be updated to account for new requirements and changes in operations. Staff review of documents submitted and used for updating WDRs is time intensive and requires extensive coordination with local enforcement agency (LEA), CalRecycle, and air quality boards; multiple rounds of review, comments; and new submittal before they are accepted and the process of writing and bringing permits to the Regional Water Board for adoption. For FY 23/24, Staff time has been budgeted to prepare updated/revised WDRs for either the Healdsburg Solid Waste Disposal Site (SWDS) or the City of Ukiah SWDS.

The Healdsburg SWDS is a closed Class III (non-hazardous solid waste) landfill currently regulated under WDRs Order No. 90-089. The revised WDRs will update requirements and account for recent changes in operations.

The City of Ukiah SWDS is a closed Class III landfill currently regulated under WDRs Order No. 02-061. In November 2020, the City of Ukiah released an Environmental Impact Report (EIR) for the City of Ukiah SWDS that is being litigated by local environmental groups. Adoption of the City of Ukiah SWDS Closure WDRs is dependent on the completion of a certified CEQA document. As responsible agency under CEQA, the Regional Water Board relies on the certification of the EIR when adopting the WDRs. If the CEQA litigation is resolved by the end of FY 22/23, the revision of WDRs Order No. 90-089 for the Healdsburg SWDS may be postponed and staff resources reallocated toward preparation of final closure WDRs for the City of Ukiah SWDS.

Land Disposal staff are reviewing Notices of Intent and technical reports for composting operations located in the North Coast Region that are required to obtain coverage under the statewide General WDRs for Composting Operations. The North Coast Region has received five NOIs for enrollment into the General Compost Order. In 2019, the NOIs and Technical Reports for four operations not eligible for an exemption were deemed incomplete. Staff will assist each applicant in gathering the necessary information for complete NOIs and will concurrently work on formal enrollment letters with comments on the Technical Reports for each facility. Following enrollment, staff will inspect the facilities, evaluate any needs for site improvements, and communicate any compliance deadlines. Staff enrolled two facilities in FY 22/23 and will enroll two more facilities in FY 23/24.

**Staff Allocation for FY 23/24: 0.25**

<b>Milestones</b>	<b>Target Date</b>
Adoption of Revised WDR for Healdsburg SWDS	Apr-24
Complete 2 Composting Enrollments	Jun-24

**1.b-d. – SMR Review, Inspecting, and Enforcement**

**Summary:** SMR review, inspections, and enforcement are all part of a broader effort to achieve regulatory compliance. SMR review and inspections assess compliance and where compliance is lacking, informal and formal enforcement can begin.

**SMR Review:** Progressive enforcement hinges on the ability of staff to detect permit violations. Without the ability to monitor all facilities continuously, staff rely on SMRs submitted by regulated facilities to document their compliance with waste discharge requirements each month or quarterly in accordance with the facility’s monitoring and reporting program. Solid waste facilities also submit an annual report that summarizes the preceding year’s monitoring data and compliance status. Groundwater Permitting Unit staff review SMRs to determine compliance with waste discharge requirements. Staff follow up may be required to address missing, unclear information or other reporting problems, or to address permit violations.

**Inspecting:** Routine compliance inspections are another important tool in progressive enforcement. These inspections ensure that submitted SMRs accurately reflect conditions at the facility and enable staff to detect issues that may not be required to be reported in SMRs. Compliance inspections include a pre-inspection review of the file record and compliance history, a site inspection, preparation of an inspection report, and follow up actions if necessary. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, it is the Groundwater Permitting Unit’s goal to visit each solid waste disposal facility every three to four years, or more frequently for facilities with higher Threat to Water Quality/Complexity ratings.

**Enforcement:** Finally, informal and formal enforcement close the loop on the progressive enforcement approach. Informal enforcement consists of (documented) verbal warnings to dischargers when minor and infrequent violations occur; Staff Enforcement Letters when more serious or more frequent violations occur; and Notices of Violation when formal enforcement would be the next step if compliance is not achieved. Formal enforcement consists of Notices to Comply when a violation is considered “minor” according to California Water Code section 13399 *et seq.*; Cleanup and Abatement Orders; Cease and Desist Orders; Time Schedule Orders; WDR Rescissions; and Administrative Civil Liabilities. Formal enforcement sets the firm expectation that the actions required by the Regional Board will be taken and attaches the threat of monetary penalties if they are not.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Collecting wastewater samples during inspections. To that end, Land Disposal Program staff will coordinate with NPDES staff to share sampling equipment, participate in training, and conduct inspections to build staff’s capability to collect samples and conduct Type A facility compliance inspections.
2. Initiating progressive enforcement for non-compliance such as late report submittals, minor discharges to land in wet weather, and lack of documentation.
3. Timely review of self-monitoring reports to ensure that Class A (serious) violations are identified and reported to the Enforcement Unit for appropriate and timely enforcement.

**Staff Allocation for FY 23/24: 1.0**

<b>Milestones</b>	<b>Target Date</b>
Conduct 14 Compliance Inspections	Jun-24
Review 14 SMRs	Jun-24

**1.e – Data Entry, Case Handling, Other**

**Summary:** Groundwater Permitting Unit staff regularly communicate with representatives of regulated facilities regarding permit compliance, response to facility-



related complaints, questions about monitoring and reporting requirements, and other discharger concerns. Approximately 600 facilities are assigned to unit staff, which results in hundreds of compliance assistance communications on an annual basis.

State Water Board staff often enlists the input of the Regional Water Boards on emerging issues and development of statewide waste discharge requirements. In FY 23/24, Groundwater Permitting Unit staff will continue engaging in statewide programmatic roundtable meetings and their associated subcommittees to assess and resolve common regulatory and data management challenges, ensure statewide consistency, address region specific issues, and develop guidance on new and emerging regulations.

**Manage Sonoma County Central SWDS:** Staff requires an especially large portion of time to oversee and manage the Sonoma County/Republic Services Central SWDS permit, including ongoing WDR Compliance Time Schedule Order deliverables required for project implementation. The facility is undergoing rapid expansion planning, design, and construction sequencing to provide for immediate capacity needs resulting from three natural disaster clean up processes which have effectively consumed the existing constructed capacity. The Rock Extraction Area, Sub-Title D- New Unit expansion landfill project is underway, requiring considerable staff resources. Two new liner construction projects and one new earth abutment project are planned for FY 23/24. Additional projects included future expansion development and siting work planned for FY's 2023 through 2025.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Providing thorough and timely reviews of special studies required by permits
2. Conducting outreach to Tribal communities, DACs, and other affected community stakeholders pursuant to AB 2108

**Staff Allocation for FY 23/24: 0.25**

## **2.f – Special Projects**

**Summary:** WDR Program staff are frequently asked to support the development and implementation of high priority regional projects, such as irrigated lands regulatory program (ILRP) tasks, especially challenging solid waste disposal sites, and programmatic improvements. The ILRP tasks are described in more detail in Section 10 and briefly summarized here.

**Irrigated Lands Support; Vineyards:** The Regional Water Board is scheduled to consider adoption of the Vineyard General Order in December 2023. Solid Waste staff have been assigned a substantial role in ensuring that the permit is completed on time. This project is described in more detail in the Irrigated Lands Program Section of this document.

**Programmatic Standard Operating Procedures Development:** Staff lack access to up-to-date templates and SOP documents for routine tasks. Because of ongoing and expected staff turnover in the coming years, it is essential to document SOPs and develop document templates that are ADA compliant. Examples include: SMR review and enforcement follow up; Special Study review; Inspection planning, execution, and follow up; ECM uploads and GeoTracker entry; and the development of SEL, NOV, and SMR templates.

**Key Issues and Considerations:** In FY 23/24, Staff will focus on:

1. Ensuring templates are ADA compliant.

**Staff Allocation for FY 23/24: 0.5**

### 8.3 Performance Targets

In FY 23/24 SWD program staff will aim for the targets given in Table 8.3. Table 8.4 does not include any potential SMR reviews, enrollments, inspections, or orders potentially contributed by the Groundwater Permitting Unit’s scientific aid. Of the identified facilities eligible for enrollment in the General WDR for Composting Operations, two are ready for enrollment letters, one was determined to be exempt, and two are pending submittal of corrected information from facility. Unforeseen delays in receiving necessary documents can result in delays in completing WDRs and their associated MRPs. For example, the CEQA document for the City of Ukiah SWDS is not yet certified, preventing staff from finalizing the permit.

In addition to the below State Water Board-established targets, the Regional Board has also set an internal goal to prepare and transmit all inspection reports to the Permittee within 30 days of inspection.

**Table 8.3 – Performance Targets for the last FY and proposed for FY 23/24**

<b>GWDRs and Waiver Enrollments</b>	<b>WDRs Adoptions</b>	<b>Compliance Inspections</b>	<b>SMR Review</b>
2	1	14	14

# 9.0 Underground Storage Tank/Site Cleanup/Department of Defense Programs

## 9.1 Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 9.1.

**Table 9.1 – FY 23/24 Program Activities and Projects by Priority**

Priority Level	Activity/Project	Target Completion Date
1	a. Ensure sites progress towards cleanup and closure.	Ongoing
1	b. Prepare enforcement documents when sites are out of compliance with Board issued orders.	Ongoing
1	c. Respond to public inquiries regarding open and closed cases.	Ongoing
2	d. Assist sites in exploring and applying for funding to move them towards cleanup and closure.	Ongoing
3	e. Assist State Board with emerging chemicals of concern and updating guidance documents and policies.	Ongoing
4	f. Review environmental assessment reports for unregulated properties to determine required action.	Ongoing

## 9.2 Activity and Project Descriptions

### Case Management

The core activity for the Site Cleanup Unit is overseeing and directing the investigation and remediation of contaminated or potentially contaminated sites under all three cleanup programs – Underground Storage Tank (UST), Site Cleanup, Department of Defense (DoD). Sites enter these programs (and become cases) due to recent or historic discharges or suspected discharges of hazardous materials (for example, fuels or solvents) to the surface or subsurface, resulting in groundwater and soil contamination. Sites include industrial facilities, dry cleaners, lumber mills, underground and above ground petroleum storage tanks, accidental spills, and leaks. Each staff

person in the Unit is assigned a case load, which can be up to 40-65 cases/sites per staff person.

The core activities are generally the same for each of the three programs and are part of regular case management work, in which staff review and respond to reports and plans, send directive letters, manage records, and perform site inspections. Sometimes for a case, staff prepare and issue enforcement actions.

Some cases in each program are stalled, and the responsible parties are conducting very little or no work on the site. Cleanup staff review these to determine the reason for the stall and take various actions to move the case forward again. The State Water Board UST program has a stalled case program and contractor (Red Horse) that assists the Unit with UST stalled cases. Enforcement is an additional tool for managing all stalled cases, but sometimes the properties have changed hands or responsible parties are no longer available and staff must investigate all potentially new responsible parties and involve them in the project.

Each staff person's time is allocated between two or three of the programs, plus grant work. Staff must manage their work time to work the assigned time within each program, due to different funding sources for each.

### **How Case Work is Prioritized:**

Considerations used in prioritizing cleanup cases include:

1. Impacts to water supply wells, human health risks including indoor air contamination, direct public contact with contamination, or discharge of contaminants to surface water, including consideration of whether or not such impacts are being managed (meaning stopped through interim measures like well head treatment or sub-slab depressurization).
2. Threatened impacts to the above that will likely occur without active remediation.
3. Potential impacts to the above not defined.
4. High likelihood of future beneficial use of groundwater.
5. Plans of potential for site redevelopment, which makes funding for remediation more available.
6. Cooperation or recalcitrance of responsible parties; funding availability.
7. Public interest.
8. Achieving case closure.
9. Other

### **1.a – Ensure sites progress towards cleanup and closure.**

**Summary:** Staff manage their case work, consisting of either UST, SCP, DoD, or grant funded sites, by reviewing and responding to various plans, reports and other

documents and taking actions to further advance the sites towards cleanup and eventual closure.

### **1.b - Prepare enforcement documents when sites are out of compliance with Board issued orders.**

**Summary:** When responsible parties do not perform the work required by the Regional Water Board, Staff prepare and issue enforcement documents to order the work to be completed. Typical enforcement documents used in the Cleanups Unit include, but are not limited to, Notices of Violation, Cleanup and Abatement Orders, 13267 Investigative Orders, and Health and Safety Code Executive Orders.

### **1.c - Respond to public inquiries regarding open and closed cases.**

**Summary:** Members of the public regularly request to discuss cases and view files for open and closed Site Cleanups cases. These files may be available electronically or as physical files or both. Staff work with the Administration Unit to locate the requested case files and make them available to the requesting party.

### **2.d - Assist sites in exploring and applying for funding to move sites towards cleanup and closure.**

**Summary:** Often sites do not have the funds available to perform the required investigation and cleanup work. Funding is not always available, but staff do explore all available options to acquire grant and assistance funding to aid in moving the sites towards cleanup and closure. These options might include Site Cleanup Subaccount Program (SCAP) grants, UST Emergency, Abandoned, & Recalcitrant (EAR) loans, UST Orphan Site Cleanup Account (OSCA) funds and US EPA targeted brownfields assessment grants.

### **3.e - Assist State Board with emerging chemicals of concern and updating guidance documents and policies.**

**Summary:** New emerging chemicals of concern are brought to the regional level most often by the State Water Board. Program Staff work with State Water Board staff to determine protocols and policies for investigating and remediating these new chemicals and to determine risks to the public health and environmental receptors.

**Fiscal Year Focus:** In FY 23/24, Staff will continue coordination with the State Water Board to assess and respond to residual soil and groundwater contamination by per- and polyfluorinated substances (PFAS) for sites and facilities in Region 1. This group of human-made substances, which have been widely used for both commercial and industrial purposes as surface coatings and protectant formulations in consumer goods such as carpet and home textiles; clothing; food packaging; and non-stick cookware as well as being present in firefighting foams. PFAS has been detected in air, water, wastewater, and soil worldwide. PFAS are especially present in and around manufacturing facilities.

#### **4.f - Review environmental assessment reports for unregulated properties to determine required action.**

**Summary:** Property owners, interested parties, consultants and local agencies will request assistance from Staff in determining if sampling data collected from a site is above thresholds to require a new case be opened or to determine recommended actions to protect the environment or public health. This sampling data is most often submitted as either a UST removal report, or a Phase I or Phase II Environmental Site Assessment. Staff reviews the data and responds appropriately to the requesting interested party.

#### **Staff Allocation for FY 23/24, Site Cleanups: 1.61**

The Site Cleanup Program is for all other hazardous material release cleanup work not covered by the UST cleanup program and DoD cleanup program. Many of these cases involve chlorinated solvent discharges from dry cleaning operations, petroleum discharges from aboveground storage tank petroleum sites, and a variety of discharges from industrial sites, including metals, wood treatment chemicals, waste oil, as well as fuels and solvents. Some of the sites have proposed redevelopment work that must be considered in the cleanup work. SCP cases also include hazardous materials spills that require significant response time and on-going work for our staff.

Many of the sites are enrolled in the State Board's Site Cleanup Cost Recovery Program, in which the responsible parties are billed for staff time. Our agency is assigned 2.0 PY in direct billable time under this program. Thus, staff track specific case work in a separate database (DARTS) for billing purposes and must also keep within budgeted time.

#### **Staff Allocation for FY 23/24, Underground Storage Tanks: 4.41**

The UST program is for cleanup work related to current and prior petroleum underground storage tank system releases. Due to US EPA rules requiring the installation of upgraded UST systems in the 1990s, most active USTs were replaced then. When old USTs were removed from the ground, contamination was frequently detected which led to our agency opening UST cleanup cases for those sites. With the upgraded systems, there are now only a few new UST cases per year, and the cases remaining open are mostly those that have significant impediments (e.g., particularly severe and/or complicated contamination impacts, recalcitrant responsible parties, lack of funding).

#### **Staff Allocation for FY 23/24, Department of Defense: 0.07**

The DoD cleanup program has a separate funding mechanism and separate state-federal agreements for cleanup work on current or former DoD sites. The types of contamination and releases are mostly the same as the other programs, as military sites could have had any number of operations that occur elsewhere (e.g., fueling, solvent work, shooting ranges).

All of our DoD cleanup program sites are formerly used defense sites (FUDS) and are no longer active military facilities. Two of the largest, the former Naval Auxiliary Air Station in the middle of Santa Rosa and the former Arcata Naval Auxiliary Air Station (the current Airport outside Arcata), have active investigation and remediation work.

**Staff Allocation for FY 23/24, SB 445 Grant Program: 0.84**

The Site Cleanup Subaccount Program (SCAP) is a funding program established by Senate Bill (SB) 445 (Hill, 2014), allowing the State Water Resources Control Board (State Water Board) to issue grants for projects that remediate the harm or threat of harm to human health, safety, or the environment caused by existing or threatened surface water or groundwater contamination. Staff work with the State Water Board, responsible parties and consultants to get sites funded in order to move them towards cleanup and closure.

**Staff Allocation for FY 23/24, Tribal Coordinator: 0.07**

The Tribal Coordinator is the primary point of contact for California Native American Tribes and the Regional Water Boards with the intent of promoting government-to-government relationships. Cody Walker, Engineering Geologist in the Cleanups unit, is the current Region 1 Tribal Coordinator. Some of the activities of the Tribal Coordinator include: Supporting RB1 staff in outreach efforts to conduct meaningful engagement, including AB 52, B-10-11, and AB 2018 implementation; review of correspondence to and from Tribes; understanding of government-to government relationships, Tribal and State histories; tracking of Regional Board activities with Tribal governments and communities; participation in working groups on climate change and racial equity; and communication with Tribal environmental professionals.

## **9.3 Performance Targets**

The general goal with the cases is to define the extent of contamination, remediate the contamination as necessary, verify remediation effectiveness through additional testing and monitoring, and institute any necessary engineering or institutional controls to prevent future exposures. A site is moved into the “Active Remediation” category once remediation work is proposed, approved and conducted on the site so that the quantity of contaminants in the soil, groundwater or soil vapor are removed or their concentrations reduced to acceptable levels. Upon successful completion of this process, the case is reviewed for closure and if it meets closure criteria it is moved into the “Closed” category. Sometimes a site can be moved into the “Closed” category without undergoing active remediation if it is determined by Regional Water Board staff that the site and remaining contamination does not pose a threat to water resources or public health. This ties into the ORPP tracked goals for the programs: number of new cases moved into remediation and number of cases closed.

### 9.3.1 Reported to State Water Board via ORPP

**Table 9.3.1 – Performance Targets for FY 23/24**

<b>Performance Targets</b>	<b>FY 23/24 Target</b>
DoD cases closed (private + UST + Cleanup)	0
SCP -sites into remediation	1
SCP cases closed	5
UST-sites into remediation	0
UST cases closed	10



# 10.0 Irrigated Lands Regulatory Program

## 10.1 Activities and Projects by Priority

The cornerstone to the ILRP is to develop and implement agricultural lands permits. The North Coast Region has 1.8 PY dedicated to this program for permit development and watershed stewardship. For FY 23/24, the Groundwater Permitting Unit, with assistance from the Groundwater Specialist, and Cannabis Regulatory Program staff is developing a vineyard permit, implementing the SRMP and the vineyard permit, and beginning to develop the Smith River Lily Bulb permit. The ILRP Program staff has identified the following priorities for FY 23/24:

**Table 10.1 – FY 23/24 Program Activities and Projects by Priority**

Priority Level	Activity/Project	Target Completion Date
1	a. Prepare General WDRs for Commercial Vineyards	Dec-23
1	b. Launch the Vineyard Program	Ongoing
2	c. Implement Smith River Plain Water Quality Management Plan (SRMP)	Ongoing
2	d. Develop Lily Bulb Regulatory Permit	Dec-25

## 10.2 Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3) and the letter (a, b, c, etc.) listed in Table 6.1 above.

### 1.a – Prepare Draft General WDRs for Commercial Vineyards

**Summary:** A cross program team of Regional Water Board staff is developing draft general WDRs to regulate commercial vineyards. Key issues include scope and coverage, pollutant discharge controls, riparian area management, and water quality monitoring and reporting requirements. A Technical Advisory Group (TAG) comprised of representatives from the vineyard industry, environmental groups, and agency partners was formed to provide input on core regulatory concepts of the Vineyard Permit so its requirements will have a strong technical basis and the cost of compliance is reasonable.

A public review draft of the general WDRs is scheduled to be released for public review in the fourth quarter of FY 22/23 along with the draft EIR. In the first and second quarters of FY 23/24, staff will focus on refining the monitoring and reporting program, engaging with prospective Third Parties, holding a public workshop, responding to public comments, and preparing the Proposed Final Order and Final EIR for consideration by the Regional Water Board.

The cross-program team includes the Division Senior Specialist (Groundwater Specialist), Land Disposal Program staff, and Cannabis Regulatory Program staff. Each of these team members may work as much as half-time (0.5 PY) on this project, with additional consultation support from the Enforcement Program Senior. The proposed time allocation could affect the ability of team members to accomplish their core duties in their primary programs.

**Staff Allocation for FY 23/24: 0.50**

<b>Milestones</b>	<b>Target Date</b>
Public Workshop	Aug-23
Finalize Draft EIR	Oct-23
Finalize Draft Order	Oct-23
Public Hearing	Dec-23

**1.b – Launch the Vineyard Program**

**Summary:** An estimated 65,000 acres and 1,200-1,500 farms are anticipated to require enrollment in the Vineyard Permit, which is scheduled for adoption in December 2023. To manage the large number of enrollments, Staff will rely on Third Parties to assist with enrollment, grower outreach, assistance with required reporting forms, monitoring and reporting. However, the North Coast Region does not yet have a grower coalition or Third Party as they currently exist in other regions and irrigated lands orders. After adoption of the Vineyard Permit, Regional Board staff must work closely with prospective Third Parties on responses to Request for Proposals (RFPs), approving reporting forms, and providing outreach resources, so that growers can begin enrolling in the Vineyard Permit through an approved Third-Party. Time on this task is also contributed by Waste Discharge to Land program staff.

Specific tasks in this effort include launching the Third Party process including coordination, requesting proposals, and reviewing and recommending Executive Officer approval of Third Party proposals; establishing data management in GeoTracker; refining reporting templates; and grower outreach.

Because of the dependence between this task and adoption of a final vineyard order, no targets or dates are provided at this time.

**Staff Allocation for FY 23/24: 0.5**

**2.c – Implement the Smith River Plain Water Quality Control Plan**

**Summary:** The Smith River Plain Water Quality Management Plan (SRMP) calls for the implementation of management practices to reduce the delivery of sediment, copper, and pesticides in runoff to surface waters, as well as water quality sampling to track changes in water quality. Elements of the SRMP will be used to develop General WDRs and/or a Waiver of WDRs associated with lily bulb cultivation in the Smith River Plain

and fully implement in the State’s Nonpoint Source Policy. Time on this task is also contributed by Waste Discharge to Land program staff.

Specific tasks in this effort include conducting inspections; assisting farmers with annual reports; water quality sampling; Stewardship Team meetings and meetings with partner agencies and Tolowa Dee-ni’ Nation; a field tour for Regional Board staff and Board Members; biotic ligand model implementation coordination; compiling and presenting program data; maintaining program website; and updating petitioners to the State Water Board as needed.

**Key Issues and Considerations:** There have also been a number of Public Records Act (PRA) requests that have diverted staff time in the past fiscal year. Therefore, staff will be proactively engaging stakeholders to ensure information is provided before the costly process of responding to PRA requests must be conducted.

**Staff Allocation for FY 23/24: 0.35**

<b>Milestones</b>	<b>Target Date</b>
Bi-Annual Agency & Tribe Meetings	Sep-23, Mar-24
Compile Grower Annual Reports	Feb-24
Hold Stewardship Team Meeting	Mar-24
Conduct Four Inspections	May-24

**2.d – Develop Lily Bulb General Order**

**Summary:** It is anticipated that information gained during implementation of the SRMP will be used to inform development of General WDRs and/or a Waiver of WDRs for discharges associated with lily bulb cultivation in the Smith River Plain. A schedule of development for the general permit has not yet been developed. However, preparatory tasks have been identified and budgeted for FY 23/24 including conducting background research on the Smith River Plain, developing an outline of the project and associated timelines, building technical resources, reviewing and developing management practices, and convening a technical stakeholder group to begin conceptual development of Order. Staff anticipate conducting approximately 2 meetings of the advisory group before the end of FY 23/24.

**Key Issues and Considerations:** This order is anticipated to be contentious and require delicate cultivation of relationships with and among interested parties. A number of challenges will need to be resolved as regulation moves from a voluntary to mandatory framework and the dischargers become accustomed to involving the environmental community in development of the order. Additionally, staffing constraints will continue to burden the Lily Bulb program as Solid Waste and WDR program staff devote much needed time to this program and leave some of their other program responsibilities on hold.

Because of the dependence between this task and adoption of a final vineyard order, no targets or dates are provided at this time.

**Staff Allocation for FY 23/24: 0.2**

## **10.3 Performance Targets**

### **10.3.1 Reported to State Water Board via ORPP**

No performance targets have been identified by ORPP for ILRP efforts to date. However, Regional Water Board staff conducts periodic site inspections in support of the SRMP and for these inspections, there is an office expectation that inspection reports will be prepared and transmitted to the appropriate parties within 30 days of the inspection date.

## 11.0 Groundwater Specialist

The Division utilizes a Groundwater Specialist as the technical expert for the Region's groundwater protection programs and coordinator for interagency groundwater management initiatives. The primary duties of the Groundwater Specialist include developing technical procedures for groundwater basin assessments, providing technical support to Regional Water Board staff in the review of hydrogeological plans and reports, designs of subsurface wastewater disposal systems and waste containment units, and subsurface contaminant fate and transport studies, and performing and directing complex environmental and geotechnical investigations and analyses. The position also plays a key role in coordinating regional groundwater monitoring, assessment, policymaking, planning, and management initiatives with internal and external partners. The subject position reports directly to the Division's Supervising Water Resource Control Engineer.

In FY 23/24, the Groundwater Specialist will undertake several initiatives to implement Resolution No. R1-2022-0040 [Groundwater Protection Strategy Policy Statement](https://www.waterboards.ca.gov/northcoast/board_decisions/adopted_orders/pdf/2022/2240_groundwater.pdf) (https://www.waterboards.ca.gov/northcoast/board\_decisions/adopted\_orders/pdf/2022/2240\_groundwater.pdf) including development of internal guidance and training for Technical Review of Reports of Waste Discharge of Wastewater to Land and Development of Waste Discharge and Monitoring Requirements. In FY 23/24 the Groundwater Specialist will also support two Special Projects within the Division: 1) Adoption of Vineyard Order and certification of Vineyard Order EIR; and 2) Development of a Lily Bulb regulatory permit and CEQA document. The Groundwater Specialist will also support the Planning & Stewardship Division's Stewardship Specialist and Flow & Riparian Protection Specialist in matters related to the impacts of agricultural pumping on groundwater quality and quantity in Smith River and Shasta River watersheds. The Groundwater Specialist is staff lead on the Laytonville Landfill Recapping Project and Beneficial Reuse (upland) of Dredge Materials.

**Staff Allocation for FY 23/24: 1.0**

## 12.0 Supporting Information

The Division Work Plan provides only a snapshot of Division's programs and activities. More detailed descriptions of the programs, their subprograms, program contacts, and other resources can be found on the [North Coast Regional Water Board's website](https://www.waterboards.ca.gov/northcoast/) (<https://www.waterboards.ca.gov/northcoast/>). Program webpages and key resource links are provided below:

The Division Work Plan also does not include important activities that are not allocated staff time due to limited staff resources. These unallocated program activities are listed below.

### 12.1 NPDES Wastewater Program

#### [Program Webpage](#)

([www.waterboards.ca.gov/northcoast/water\\_issues/programs/npdes\\_permitting/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/npdes_permitting/))

Unallocated Program Activities for FY 23/24:

#### Wastewater Permitting Program

- Implementation of the federal pretreatment program
- Development of subject matter experts in area such as recycled water, collection systems, pretreatment, monitoring and ELAP
- Improved coordination with statewide efforts
- Internal processes improvement efforts.

### 12.2 NPDES Storm Water Programs

#### [Program Webpage](#)

([www.waterboards.ca.gov/northcoast/water\\_issues/programs/npdes\\_stormwater/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/npdes_stormwater/))

Unallocated Program Activities for FY 23/24:

#### Municipal Storm Water Program

- Additional inspection and program audits beyond performance targets
- Robust document review and timely response
- Increased coordination with nonpoint source and 401 Certification, planning, and groundwater program staff for projects and facilities with permits issued under multiple programs (e.g., a construction project in a regulated MS4 area where the Regional Water Board has issued coverage under the Construction Stormwater General Permit and for which a 401 Water Quality Certification has also been issued)
- Development of deeper subject matter expertise in areas such as Low Impact Development design, municipal operations, sampling and monitoring

- Robust implementation of statewide general permits such as Utility Vault, Pesticide, and Low Threat permits, and internal processes improvement efforts.

#### Construction Stormwater Program

- Additional inspections above the program performance targets
- Robust review of discharger-submitted documents such as annual reports, SWPPPs, and monitoring reports
- Increased data evaluation to identify trends for issues such as common issues at sites, contractors or QSPs that struggle to maintain compliance, watersheds, cities or counties that have non-compliant sites, and the identification of training needs within the regulated community
- Increased compliance support and training for the regulated community as well as for our city and county inspectors
- Improved coordination with statewide efforts related to permit implementation and renewal
- Increased coordination on enforcement efforts
- Improved coordination with Cannabis and Irrigated Agriculture programs
- Internal processes improvement efforts.

#### Industrial Stormwater Program

- Additional inspections of regulated facilities beyond the program performance targets
- Robust review of documents such as annual reports, SWPPPs, routine monitoring reports, and other documents and permit-related notices submitted by dischargers
- Increased data evaluation to identify trends for issues such as, common issues at facilities, identification of additional sectors and/or pollutants of concern, watersheds, cities or counties that have non-compliant sites, and the identification of training needs within the regulated community
- Increased compliance support and training
- Improved coordination with statewide efforts related to permit implementation and renewal
- Increased coordination on enforcement efforts
- Improved coordination with other regulatory programs
- Evaluation of the need to regulate additional sectors
- Evaluation of the need for facility specific requirements
- Internal processes improvement efforts.

## **12.3 Groundwater Permitting Programs**

### [Program Webpage](#)

([www.waterboards.ca.gov/northcoast/water\\_issues/programs/wastewater\\_permitting/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/wastewater_permitting/))

Unallocated Program Activities for FY 23/24:

Waste Discharge to Land Program

- septage disposal projects and existing permits
- active mines regulated under WDRs
- abandoned and unregulated mines.

Solid Waste Program

- Routine case management for facilities located in Northern counties
- Revisions to existing MRPs
- Review of financial assurance documents
- Responding to complaints or conducting enforcement
- Development of General WDRs for landfill operations or expansion and closure construction
- Oversight of landfill post closure land use and development
- Oversight of Solid Waste Assessment Test (SWAT) program sites, PFAS concerns for old landfills and burn dumps
- Integrating program into coordinated databases consistent with GeoTracker Initiative
- GeoTracker database cleanup and refining
- Tracking and providing input on legislative changes to the industry on evolving waste management concepts such as zero waste, anaerobic digesters, soil waste piles diversion
- Routine coordination with each County LEA.

## **12.4 UST/ Site Cleanup/ Department of Defense Programs**

[RB1 Program Webpage](http://www.waterboards.ca.gov/northcoast/water_issues/programs/cleanups/)

([www.waterboards.ca.gov/northcoast/water\\_issues/programs/cleanups/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/cleanups/))

[State Water Resources Control Board UST Cleanup Program](https://www.waterboards.ca.gov/ust/cleanup/)

(<https://www.waterboards.ca.gov/ust/cleanup/>)

[State Water Resources Control Board Site Cleanup Program](https://www.waterboards.ca.gov/water_issues/programs/site_cleanup_program/)

([https://www.waterboards.ca.gov/water\\_issues/programs/site\\_cleanup\\_program/](https://www.waterboards.ca.gov/water_issues/programs/site_cleanup_program/))

[Site Cleanup Subaccount Program \(SCAP\)](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/scap/)

([www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/scap/](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/scap/))

[Emergency, Abandoned, & Recalcitrant \(EAR\) Account – Fact Sheet](http://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/ear/ear_fs.pdf)

([www.waterboards.ca.gov/water\\_issues/programs/ustcf/docs/ear/ear\\_fs.pdf](http://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/ear/ear_fs.pdf))

[Orphan Site Cleanup Account \(OSCA\) – General Information Sheet](#)



([www.waterboards.ca.gov/water\\_issues/programs/ustcf/docs/osca/program\\_12\\_21\\_052.pdf](http://www.waterboards.ca.gov/water_issues/programs/ustcf/docs/osca/program_12_21_052.pdf))

[Brownfields Program](http://www.waterboards.ca.gov/water_issues/programs/brownfields/) ([www.waterboards.ca.gov/water\\_issues/programs/brownfields/](http://www.waterboards.ca.gov/water_issues/programs/brownfields/))

## **12.5 Irrigated Lands Regulatory Program**

[RB1 Program Webpage](http://www.waterboards.ca.gov/northcoast/water_issues/programs/agricultural_lands/)

([www.waterboards.ca.gov/northcoast/water\\_issues/programs/agricultural\\_lands/](http://www.waterboards.ca.gov/northcoast/water_issues/programs/agricultural_lands/))

[SWRCB Webpage for Eastern San Joaquin River Watershed General WDRs for Discharges from Irrigated Lands](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/eastern_sanjoaquin_watershed_wdrs/)

([www.waterboards.ca.gov/centralvalley/water\\_issues/irrigated\\_lands/regulatory\\_information/eastern\\_sanjoaquin\\_watershed\\_wdrs/](http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/eastern_sanjoaquin_watershed_wdrs/))