

NORTH COAST REGIONAL WATER BOARD

Point Source & Groundwater Protection Division

Programs:

NPDES Wastewater

NPDES Stormwater

Waste Discharge to Land

Solid Waste Disposal

Underground Storage Tank Cleanup/Site Cleanup/DoD Cleanup

Groundwater Protection

Agricultural Lands Discharges

Fiscal Year (FY) 2019-2020 WORK PLAN



Division Chief: Charles Reed, P.E.

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Cover Photos: Santa Rosa Creek upstream of Willowside Road.

1.0 BACKGROUND

1.1 NPDES Wastewater Program

The National Pollutant Discharge Elimination System (NPDES) program is a federal program, which has been delegated to the State of California for implementation. NPDES permits, also referred to as Waste Discharge Requirements, are issued to regulate the discharge of municipal wastewater or industrial process, cleaning, or cooling wastewaters, commercial wastewater, treated groundwater from cleanup projects, or other wastes to surface waters only. If the waste discharge consists only of non-process storm water, it may be regulated under the NPDES Storm Water program.

NPDES wastewater permits contain effluent limitations that prescribe the level of pollutants allowed in the discharge. These limits are based on either technology-based limits or water-quality based limits. Technology-based limits require that the best available technology (BAT) be used for the removal of pollutants. Water-quality based limits are those limits that are more stringent than technology-based limits and are applied when necessary to achieve water quality standards as set by the Basin Plan beneficial uses and water quality objectives.

NPDES wastewater permits can be issued for individual discharges or as a general NPDES permit for a class or group of discharges. Permits are issued for a five-year period and must be reviewed and reissued every five years. Facilities are also classified as either major or minor facilities depending on the volume and/or type of pollutants discharged. Major facilities are facilities with design flows greater than one million gallons per day and facilities with approved industrial pretreatment programs. Minor facilities are facilities with design flows equal or less than one million gallons per day and which have not been determined to have an actual or potential adverse environmental impact classifying the discharge as major.

There are currently forty (40) facilities within the North Coast Region which discharge wastewater to surface waters that are currently regulated by NPDES permits issued by the Regional Water Board. The table below indicates the number of facilities by discharge type.

Number of Wastewater NPDES Permits by Type

Municipal	Industrial	College	Fish Hatcheries
26	6	3	5

The Regional and State Water Board also develop and issue general NPDES wastewater permits to cover multiple facilities within a specific category. The use of general permits allows us to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. The table below indicates the total number of facilities covered by the current available general NPDES permits. There are currently forty-two (42) facilities regulated under general NPDES permits in the North Coast Region.

General NPDES Permit	Current Number of Active Enrollees in Region 1
General Order for Low Threat Discharges (R1-2015-0003)	3
General Order for Treated Groundwater Petroleum Hydrocarbon & Volatile Organic Compound (R1-2016-0034)	3
Statewide General Order Pesticide Aquatic Invasive Species (2011-0003-DWQ)	0
Statewide General Order Pesticide Spray Application (2011-0004-DWQ)	0
Statewide General Order Pesticide Vector Control (2011-0002-DWQ)	1
Statewide General Order Pesticide Weed Control (2013-0002-DWQ)	9
Statewide General Order Utility Vaults (2014-0174-DWQ)	8
Statewide General Order Drinking Water System Discharges (2014-0194-DWQ)	23

1.2 NPDES Storm Water Program

The Federal Clean Water Act (Clean Water Act) prohibits certain discharges of storm water containing pollutants except in compliance with a NPDES permit. The NPDES stormwater program regulates stormwater discharges from three potential sources: municipal separate storm sewer systems (MS4s), construction activities, and industrial activities.

1.2.1 Municipal Stormwater Program

The Municipal Storm Water Permitting Program regulates storm water discharges from municipal separate storm sewer systems (MS4s). Pursuant to the Federal Water Pollution Control Act (Clean Water Act) section 402(p), storm water permits are required for discharges from an MS4 serving a population of 100,000 or more. The Municipal Storm Water Program encompasses the Phase I Permit Program (serving municipalities over 100,000 people), the Phase II Permit Program (for municipalities less than 100,000), and the Statewide Storm Water Permit for the California Department of Transportation (Caltrans Permit).

Phase I Permit Program

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. The Phase I permit is scheduled to be reissued by the State Water Board in 2021.

Phase II Permit Program

The State Water Resources Control Board issued a General Permit for the Discharge of Storm Water from Small MS4s (Order 2003-0005-DWQ) to provide permit coverage for smaller municipalities, including non-traditional Small MS4s, which include facilities such as military bases, public campuses, prison and hospital complexes. The Phase II Small MS4 General Permit covers Phase II permittees statewide. On February 5, 2013 the Phase II Small MS4 General Permit was re-adopted (Order 2013-0001-DWQ) and the new requirements became effective on July 1, 2013. The Phase II Small MS4 General Permit is scheduled to be reissued by the State Water Board in 2021. Regional Water Board staff is participating in this effort.

Caltrans Permit Program

The State Water Board issued the Caltrans Permit, which regulates all discharges from Caltrans MS4s, maintenance facilities, and construction activities. Caltrans is responsible for the design, construction, management, and maintenance of the State highway system, including freeways, bridges, tunnels, Caltrans' facilities, and related properties, and is subject to the permitting requirements of Clean Water Act section 402(p). Caltrans' discharges consist of storm water and non-storm water discharges from State owned rights-of-way. A Caltrans contract liaison housed in the Nonpoint Source & Surface Water Protection Division is responsible for review and issuance of Caltrans's Clean Water Act section 401 water quality certifications, which includes oversight of storm water discharges from those projects. Regional Water Board municipal storm water staff is participating with State Water Board staff to develop a new Caltrans MS4 storm water permit, which is scheduled to be adopted in 2020. Municipal storm water staff is also working with State Water Board staff to redirect some of the existing TMDL monitoring requirements, unfit for the North Coast Region TMDL monitoring needs, with financial support for the Klamath Basin Monitoring Program (KBMP).

1.2.2 Construction Stormwater Program

Dischargers whose projects disturb one (1) 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 General Permit for Discharges of Storm Water Associated with Construction Activity, Order 2009-0009-DWQ (Construction Stormwater General Permit). Construction activity subject to this permit includes clearing, grading and disturbances to the ground such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. There are currently 236 active sites enrolled under the Construction Stormwater General Permit.

1.2.3 Industrial Stormwater Program

Industrial storm water discharges and authorized non-storm water 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 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, larger sewage and wastewater plants, recycling facilities, and oil and gas facilities. There are currently 427 active facilities currently enrolled under the Industrial Stormwater General Permit.

Storm Water NPDES Permit	Current Number of Active Enrollees
Phase 1 Storm Water Permit	10
Phase 2 Storm Water Permit	12
CalTrans Storm Water Permit	22
Construction Storm Water Permit	236
Industrial Storm Water Permit	427

1.3 Waste Discharge to Land Program (Wastewater, Waste Residuals, and Recycled Water)

The Waste Discharge to Land Program regulates all point source discharges of waste to land that do not require full containment (which falls under the Solid Waste Disposal Program), do not involve confined animal facilities (which falls under the Dairy Program), and involve no discharge of a pollutant to a surface water of the United States (which falls under the NPDES Program). To regulate these discharges for the protection of groundwater, the Regional Water Board prescribes waste discharge requirements (WDRs) or issues conditional waivers of WDRs. WDRs are written for a specific discharger (individual WDRs) or to regulate a similar group of dischargers (general WDRs). In recent years, the Program staff has also used conditional waivers, which may be used to regulate those discharges that have the lowest threat to water quality.

Dischargers of municipal, commercial, and combined industrial wastewaters in the north coast region that discharge exclusively to land rely primarily on aerobic wastewater treatment systems to reduce pollutants to levels that, after discharge, are protective of groundwater quality and public health. Common methods of disposal of treated effluent is via percolation ponds, infiltration beds, large leachfield systems, or via spray or drip irrigation.

The State and Regional Water Boards develop and issue general permits to cover multiple facilities within a specific category. The use of general permits allows the Water Boards to allocate resources in a more efficient manner and provide timely permit coverage for large numbers of facilities in the same category. In addition, the use of a general permit ensures consistency of permit conditions for similar facilities. General permits may be written to cover categories of point sources having common elements, such as:

- Facilities that involve the same or substantially similar types of operations
- Facilities that discharge the same types of wastewater
- Facilities that require the same effluent limitations or operating conditions
- Facilities that require the same monitoring where tiered conditions may be used for minor differences within class (e.g., size or seasonal activity)
- Facilities that are more appropriately regulated by a general permit

The following are general permits commonly used in the North Coast Region for wastewater discharges to land:

- Small Domestic Wastewater Treatment Systems General Permit
- General Permit for Sanitary Sewer Systems

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- General Permit for Recycled Water Use
- General Permit for Wine, Beverage, and Food Processor Waste
- General Permit for Low Threat Discharges
- General Permit for Transportation Structure Repainting
- General Permit for Drinking Water Systems Discharges

The Regional Water Board may issue a waiver of waste discharge requirements for a specific discharge or category of discharge if the waiver is consistent with the Water Quality Control Plan for the North Coast Region (Basin Plan) and is in the public interest. In 2017, the North Coast Regional Water Board adopted Order No. R1-2017-0039, Conditional Waiver of Waste Discharge Requirements for Specific Categories of Low Threat Discharge in the North Coast Region.

WDRs issued by the Regional Water Board include prohibitions, effluent limitations, and other general provisions to ensure that the discharge complies with all laws, regulations, and policies set forth in the Basin Plan for the North Coast Region. Self-monitoring programs are also prescribed that require the waste discharger to collect and submit to the Regional Water Board effluent and other water quality monitoring data to determine compliance with WDRs.

The number and type of facilities currently regulated by waste discharge requirements in the Waste Discharge to Land Program include:

- Municipal and community wastewater treatment facilities (37)
- Wineries and other Beverage and Food Processors (116)
- Recycled Water Producers and Users (20)
- Public Sanitary Sewer Systems (71)
- Mobile Home Parks, Campgrounds, Caltrans Roadside Rest Areas, Private WWTPs (73)
- Sawmills (2)
- Projects involving the land application of biosolids and ash (4)

1.4 Solid Waste Disposal Program

The Solid Waste Land Disposal Program oversees the discharge to land of certain solid or liquid wastes. These wastes include municipal solid waste (MSW), hazardous wastes, designated wastes, nonhazardous, and inert solid wastes. In general, these wastes cannot be discharged directly to the ground surface without adversely affecting groundwater or surface water, and therefore must be contained in waste management units to isolate them from the environment. The land disposal program is a United States Environmental Protection Agency (USEPA) approved program for implementing the USEPA RCRA Subtitle D regulations. California Code of Regulations (CCR) Title 27 contains the regulatory requirements for non-hazardous wastes. CCR Title 23 (Chapter 15) contains the regulatory requirements for hazardous wastes. These regulations prescribe standards for classifying waste; siting of waste management units; waste containment construction; operation; maintenance; closure; monitoring of the vadose zone, storm water, surface water, and groundwater; and requirements for corrective actions in the event of a release of waste constituents from the waste management unit (WMUs). The Regional Water Board implements these requirements through the adoption of waste discharge requirements and enforcement orders.

Increasing Federal and State requirements in the 1990s resulted in the stoppage of operations at many of the locally owned and operated municipal landfills throughout the North Coast Region prior to these landfills reaching full capacity of their existing WMUs. As a result, the region has one remaining operating municipal solid waste disposal site (SWDS): the Sonoma County Central Landfill, located near Cotati. Consequently, permitting workload for one Land Disposal Program staff includes the complicated and resource intensive process for permitting new WMUs (i.e., operating cells) at the Sonoma County Central SWDS or closure permitting. Staff permitting time necessarily prioritizes the open Central landfill and overseeing closed landfills that have not completed the construction of their final landfill cover system.

Review of closure reports and new WMU construction reports, which are the main documents used for permitting for these types of projects, are one of the biggest workloads staff face. A given closure plan/new cell construction report is a composition of multiple technical reports, all which must be reviewed for technical and regulatory compliance. Typical landfill components which require design review technical reports found within closure plans/new cell construction reports include final cover systems or base liner systems comprised of foundation layer, barrier layer(s), vegetation layer (for closure) or operations layer (for new construction); the leachate, collection, recovery, and storage systems (LCRS); surface water control systems; and landfill gas control systems. Other technical issues found within closure plans/new cell construction reports include slope stability calculations for both static and seismic conditions; CEQA compliance documents; other resource agency permits and their supporting documentation; assessment of material settling; a Construction Quality Assurance Plan (CQA Plan); and water balance models. These large projects require coordination with the 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 Board for adoption.

Once the permit has been issued and construction of closure systems or new WMUs has begun, staff must maintain an active regulatory presence via inspections and review of daily field logs, monthly summary reports, CQA testing, and various specific reports required by the project CQA to verify that the project is being completed as proposed. Once the project construction is completed a final CQA report is submitted, which staff must review and approve and issue either Closure Certification or Waste Management Unit Certification.

Staff oversight of the remaining WMUs in the region, which include MSW landfills, wood waste disposal sites, waste piles, land treatment units, and now compost facilities is ongoing. For these facilities staff conducts routine site inspections, continues oversight of landfill environmental control systems, reviews self-monitoring and other technical reports, reviews and revises monitoring and reporting programs, continues oversight of any post-closure maintenance issues, and evaluates adequacy of environmental controls for development encroachment in accordance with Land Disposal Program priorities.

In addition to the active regulated facilities managed by staff, historic sites commonly demand staff time as part of various development projects, third-party inquiries, and other land use issues. Because Land Disposal Program staff are not initiating or directing these projects, they are rarely accounted for in staff work plans. Moreover, these projects are often time-sensitive and demand staff attention to prevent project delay or an unintended environmental release.

The number and types of facilities regulated under the Land Disposal Program include:

- Municipal Solid Waste Landfills (18)
- Wood Waste Disposal Sites (25)
- Burn Dumps/unregulated (110)
- Land Treatment Units (1)
- Active Mines (2)
- Inactive or Abandoned Mines, not currently regulated under WDRs (45)
- Surface impoundments, Class II (2)
- Waste piles (1)
- Compost Facilities (4)
- Other (8)

1.5 Underground Storage Tank/Site Cleanup/DoD Programs

Petroleum Underground Storage Tanks (USTs) are a historical source of groundwater pollution. Most UST hold or held fuel, which is the main emphasis of this program (other pollutants are covered by the Site Cleanup Program). Under State law USTs need to be monitored for leaks (monitoring is administered by local agencies). If leaks are discovered, Regional Board staff, working with local agencies, require a subsurface investigation, removal of subsurface structures, cleanup of secondary sources and monitoring of groundwater. In the North Coast, Regional Water Board staff works in partnership with only one Local Oversight Program (LOP) to oversee the cleanup of UST sites in Sonoma County. The Sonoma County Department of Health Services, Environmental Health Division is the LOP certified by the State Water Resources Control Board to oversee the implementation of UST cleanups. The Regional Water Board serves as the oversight agency of the Sonoma County LOP.

The Site Cleanup Program (SCP) regulates and oversees the investigation and cleanup of 'non-federally owned or used' sites where recent or historical unauthorized releases of pollutants to the environment, including soil, groundwater, surface water, and sediment, have occurred. Sites in the program are varied and include, but are not limited to, industrial manufacturing and maintenance sites, dry cleaners, lumber mills and bulk fueling facilities. These releases are generally not from strictly petroleum underground storage tanks (USTs). The types of pollutants encountered at the sites are diverse and include solvents, pesticides, heavy metals, and fuel constituents.

The Department of Defense (DoD) Cleanup program only include Formerly Utilized Defense Sites (FUDS) which are facilities that were owned, operated, or leased by a branch of the DoD for various uses such as missile silos, gun batteries, listening posts, and radar stations. Soil and groundwater cleanup activities at Departments of Defense facilities are regulated in conjunction with the California Department of Toxic Substances Control (DTSC). Cleanup of DoD facilities must comply with Water Board policies and directives to protect water quality, beneficial uses,

and environmental/ecological health. Areas of concern include soil and groundwater contamination, storm water and surface water discharges, and contaminated sediments.

In all the cleanup programs, impacts and potential impacts have to be considered for groundwater, surface water, soil, soil gas, and indoor air vapor intrusion. For groundwater and surface water, our Basin Plan, the Water Code, the Health and Safety Code, and State Water Board policies are used in evaluating impacts. CalEPA and DTSC guidance documents are used when evaluating soil, soil gas, and indoor air exposure pathways.

Currently there are 157 open UST program sites, 255 SCP sites, and approximately 15 DoD program sites (with multiple sub-sites at some formerly used defense sites) in the North Coast region.

1.6 Groundwater Protection Program

The goal of the groundwater protection program is to preserve and maintain high quality groundwater and to restore degraded groundwater. The Regional Water Board protects groundwater through several programs that are responsible for developing and implementing plans & policies, waste discharge requirements, groundwater investigations and cleanups, and enforcing water code violations.

A priority project identified by the Triennial Review of the Basin Plan and the Groundwater Strategic Team is the development of a groundwater protection policy. This project began on the Triennial review in 2007 as a comprehensive Basin Plan amendment that included revisions to chapter 3 (water quality objectives) and chapter 4 (implementation plans). Due to the large scope of work, the project was divided into two phases: Phase I involved updating the water quality objectives and phase II includes the development of a groundwater protection policy. Phase I was completed with the adoption of Resolution No. R1-2015-0018 in June 2015. During the adoption of the 2014 Triennial Review of the Basin Plan in March 2015, the Board identified Phase II as priority No. 5¹.

In 2015, the Regional Water Board staff formed the Groundwater Strategic Team to support efforts in groundwater resources preservation, protection, and remediation. The Groundwater Strategic Team expanded the vision of the groundwater protection policy beyond the basin plan amendment project as described in the 2014 Triennial Review to include other regulatory and non-regulatory elements. To capture these other regulatory and non-regulatory elements, the project was renamed as the North Coast Groundwater Protection Strategy. The strategy is intended to prioritize, coordinate, and implement Regional Water Board tools² and statewide tools³ for the protection of groundwater quality on a basin wide scale with the goal of protecting

¹ Triennial Review Project No. 5 includes the development of a groundwater protection policy, policy to promote groundwater recharge, programmatic approach to managing salts and nutrients in groundwater and the update of Table 2-1 of the Basin Plan to include beneficial uses for individual groundwater basins, where appropriate.

² Existing regulatory and non-regulatory tools include development or revision of water quality standards, policies, and prohibitions (basin plan amendment); monitoring and assessment; issuance of waste discharge requirements; and enforcement actions.

³ Local and statewide activities of importance include: DWR's groundwater management planning; SWRCB's salt and nutrient management planning under the Recycled Water Policy; groundwater-surface interaction assessments; and statewide efforts to update groundwater monitoring protocols, data assessment and presentation tools.

ecosystem function and advancing the human right to clean water under current and future climatic conditions. The strategy includes the following five components:

1. Groundwater Protection Programs
2. Groundwater Ambient Monitoring and Assessment (GAMA) Program
3. Statewide Policies and Regional Planning
4. Data Driven Adaptive Management
5. Partnering

The Groundwater Strategic Team identifies opportunities to better protect water resources and provides resources (in the form of data and background materials) needed to support basin planning, basin-scale assessment, discharge permitting and remediation efforts. The Team serves as a forum through which Regional Water Board staff can share expertise and perspective. The Groundwater Team Charter identifies the following projects as team priorities for the North Coast Region:

1. *Basin Plan Amendments and Order Renewals*: Develop the Phase II Basin Plan amendment which involves development of a groundwater protection policy. Continue to update and renew orders that are protective of groundwater resources.
2. *Basin Scale Groundwater Assessments*: Develop the procedures required to assess, characterize and determine the condition of and risk to groundwater quality at basin/aquifer scale.
3. *Sustainable Groundwater Management Act (SGMA)*: In coordination with State Water Board and California Department of Water Resources, provide the local Groundwater Sustainability Agencies in the North Coast Region with water quality data, assessment tools, and water quality standards as they develop Groundwater Sustainability Plans.
4. *Periodic Meetings and Presentations*: The Groundwater Team meets periodically to hear presentations from Water Board staff, outside agencies, vendors, or consultants regarding water supply, groundwater protection, and/or groundwater cleanup issues. These meetings are a good opportunity to make contacts with other agencies and learn more about their interests/priorities regarding groundwater issues in the region.
5. *Statewide Policy Development*: Participate in State Water Board and other relevant policy or legislative developments to promote our unique perspective on the protection of high-quality waters in the North Coast Region.
6. *Groundwater/Surface Water Interaction*: Develop strategies for integrating groundwater concerns into the management of watersheds, and vice versa.

1.7 Agricultural Lands Discharge Program

The North Coast Regional Water Board implements a broad Agricultural Lands Discharge Program, which addresses water quality impacts associated with activities on agricultural lands in the North Coast Region. There are approximately 350,000 acres of agricultural lands in the Region, which are primarily used for vineyards, orchards, row crops, grain, alfalfa, hay pasture, and dairies. Agricultural discharges can contain pollutants such as pesticides, nutrients, organic matter, salts, pathogens, and sediment. These pollutants can harm aquatic life or make surface or groundwater unusable for drinking water or agricultural uses. Activities on agricultural lands can also result in the removal or suppression of riparian vegetation, which provide shade and other ecological functions to waterbodies. The Agricultural Lands Discharge Program is designed to meet the requirements of the California Water Code, the State Nonpoint Source Policy, and the Total Maximum Daily Loads (TMDLs) developed for certain watersheds in the Region.

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The Agricultural Lands Discharge Program encompasses several separate Regional Water Board permits that address discharges of waste associated with agricultural lands. The scope of the program is defined by either the crop type or geographic location. Much of the Regional Water Board's activities associated with the Agricultural Lands Discharge Program are undertaken by the Cannabis and Enforcement Division and Nonpoint Source and Surface Water Protection Division. In April 2018 the North Coast Region hired a new staff person (1.0 PY) with dedicated funding for the Agricultural Lands Discharge Program. This staff person is now housed in the Groundwater Permitting Unit and the focus of current work is the development of a permit for vineyards. Additional work is conducted by a staff person in the Planning and Watershed Stewardship Division who is tasked with developing a water quality management plan and subsequent waste discharge permit for lily bulb cultivation in the Smith River Plain.

2.0 DIVISION RESOURCES

2.1 Staffing

Three units and one specialist implement six distinct programs: (1) NPDES wastewater program, (2) NPDES municipal, industrial and construction stormwater program, (3) waste discharge to land program, (4) solid waste disposal program, (5) UST/Site Cleanup/DoD programs, and (6) groundwater protection program.

The three Division units tasked with implementing the above six programs are: 1) NPDES Unit, 2) the Groundwater Permitting Unit, and (3) Cleanups Unit. The groundwater protection specialist is responsible for developing and implementing our Region's groundwater protection program.

Table 1 – Division Staff, Includes Management and Support Staff

Position	Name	Division or Unit	PYs
Division Chief	Charles Reed	Point Source Control & Groundwater Protection	1.0
Specialist	Jeremiah Puget	Point Source Control & Groundwater Protection	1.0
Senior	Heaven Moore	NPDES Unit	1.0
Technical	5.7 Staff (+1 vacancy) ⁴	NPDES Unit	6.7
Senior	Vacant	Groundwater Permitting Unit	1.0
Technical	5.35 Staff ⁵	Groundwater Permitting Unit	5.35 ⁵
Senior	Craig Hunt	Site Cleanup Unit	1.0
Technical	6 Staff (+1 vacancy)	Site Cleanup Unit	7.0
Admin Support			
Support Staff	3 Staff	Administration	Variable
Scientific Aid	1 (vacant) ⁶	Point Source Control & Groundwater Protection	
		Total:	24.05

⁴ 0.7 PY under NPDES Unit does work supporting Groundwater Permitting Unit efforts. Current Wastewater vacancy recruitment resulted in a single applicant and will likely need to re-advertise. Therefore, Wastewater workload estimated based on two staff.

⁵ In FY 19/20, approximately 0.35 PYs will be allocated from the Adaptive Management Unit to the Groundwater Permitting Unit for updating existing WDRs.

⁶ The Scientific Aid positions are not added to the total PYs; although these positions support Division core activities when filled, these are part-time positions that are not always available to provide such support.

3.0 NPDES WASTEWATER PROGRAM

3.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 2.

Table 2 – FY 19/20 NPDES Wastewater Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	Category	Target Date
1	a. Prepare individual NPDES permits for new unpermitted facilities and new enrollments under General NPDES permits (0.2)	Core	On-going
1	b. Renew existing individual and General NPDES permits for both major and minor wastewater facilities (1.7)	Core	On-going
1	c. Conduct inspections for both major and minor wastewater facilities and enrollees under General NPDES permits to ensure compliance with permit requirements (0.1)	Core	On-going
2	a. Case Handling (0.2)	Core	On-going
2	b. Program Management and Implementation (0.2)	Core	On-going
2	c. Participation in Development of Statewide General Orders and Initiatives (0.1)	Core	On-going

Categories: Categories are marked as either **Core** or **Special**

3.2 Core Activity and Project Descriptions

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

1.a – Prepare new individual NPDES Permits and enroll facilities under General Permits

Summary: As permit applications are received, NPDES staff prioritizes and reviews applications, notify the applicants of the completeness of the applications, work with applicants to obtain required information, and prepare waste discharge requirements based on complete applications. In FY 2019-20, Staff plan to prepare two new individual NPDES permits (Fall Creek Hatchery and Samoa Peninsula CSD) for Board consideration and adoption and anticipate enrolling four new facilities (Coyote Valley, Bodega Farms, Warm Springs Fish Hatchery, and Purple Urchin facility), under general NPDES permits. However, the final number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and could change due to competing work priorities.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.2

New NPDES Permits or Enrollments	Target Date
<i>Samoa Peninsula Community Services District WWTP NPDES Permit Adoption</i>	<i>June 2020</i>
<i>Fall Creek Fish Hatchery</i>	<i>June 2020</i>
<i>General NPDES Permit Enrollments</i>	<i>Ongoing</i>

1.b - Renew existing individual NPDES permits

Summary: NPDES permits are renewed every five years. Based on a review of the region's existing NPDES permits, the NPDES Unit staff plans to renew a total of ten individual NPDES permits during FY 2019-20 (for 5 minor facilities and 3 major facilities). Additionally, staff will be renewing one General Permits (Low Threat Discharge). Staff also plan to draft permits during FY 2019-20 which will be adopted in the first quarter of FY 2020-21. Updates are anticipated for the following facilities:

NPDES Permit Renewal	Target Date
<i>1. Arcata Community Services District WWTP (Major)</i>	<i>December 2019</i>
<i>2. HSU Telonicher Marine Laboratory (Minor)</i>	<i>December 2019</i>
<i>3. UC Davis Bodega Marine Laboratory (Minor)</i>	<i>December 2019</i>
<i>4. Town of Windsor WWTP (Major)</i>	<i>March 2020</i>
<i>5. City of Santa Rosa WWTP (Major)</i>	<i>March 2020</i>
<i>6. City of Loleta WWTP (Minor)</i>	<i>March 2020</i>
<i>7. Occidental CSD (Minor)</i>	<i>March 2020</i>
<i>8. Russian River Community Services District WWTP (Minor)</i>	<i>June 2020</i>
<i>9. Low Threat Discharge (General Permit)</i>	<i>June 2020</i>

Key Issues to Resolve: Due to limited NPDES Unit staff resources (as of early July 2019, there has been one vacancy in the unit for 6 months), competing priorities, and emerging permit issues, NPDES permit renewals are subject to delays. Current Wastewater vacancy recruitment resulted in a single applicant and will likely need to re-advertise. Therefore, Wastewater workload estimated based on two staff. Also, NPDES permit renewals that authorize the production and use of Recycled Water may experience delays due to the need for the Permittee to prepare and obtain approval from the State Water Board's Division of Drinking Water of a Title 22 Engineering Report. All permits must now comply with the Americans with Disabilities Act (ADA) which takes additional staff time to prepare ADA compliant permits.

PY Allocation for FY 19/20: 1.7

1.c – Conduct inspections and prepared compliance reports for major and minor wastewater facilities

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provides 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 US 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. The table below indicates proposed inspections for six major and five minor facilities for FY 2019-20.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

Facility Inspection	Target Date
1. Forestville Water District (Minor)	September 2019
2. City of Arcata WWTP (Major)	December 2019
3. City of Ferndale WWTP (Minor)	December 2019
4. City of Loleta (WWTP) (Minor)	December 2019
5. City of Eureka WWTP (Major)	March 2020
6. City of Fortuna WWTP (Major)	March 2020
7. Graton CSD (Minor)	March 2020
8. Crescent City WWTP (Major)	March 2020
9. City of Ukiah (Major)	March 2020
10. Fort Bragg Municipal Improvement district WWTF (Major)	June 2020
11. Mendocino City CSD WWTP (Minor)	June 2020

2.a– Case Handling

Summary: Each NPDES Wastewater Program staff currently has assigned to them approximately 20 NPDES facilities, for which staff conducts routine case handling tasks throughout the fiscal year. Routine case handling includes self-monitoring report review and compliance determination, facility-related, complaint and spill response, public inquiries, informal enforcement actions (e.g., staff enforcement letters, NOVs), Public Records Act requests, and electronic file management.

Key Issues to Resolve: The NPDES Wastewater Program has been understaffed since the departure of one WRCE in January 2019. The vacancy is expected to be filled in the first quarter of FY 2019-20.

PY Allocation for FY 19/20: 0.2 PY

2.b– Program Management and Implementation

Summary: Also in FY 19/20, Program staff will conduct outreach to NPDES facilities to encourage local and regional planning for disaster preparedness, which will include development of short-term and long-term plans to protect vital infrastructure in response to earthquakes, floods, wildfires, and impacts related to climate change (e.g., sea level rise, extended drought conditions). Staff work will include technical assistance and support for local agency efforts to seek and secure public funding for water and wastewater infrastructure projects.

Key Issues to Resolve: The NPDES Wastewater Program has been understaffed since the departure of one WRCE in January 2019. The vacancy is expected to be filled in the first quarter of FY 2019-20. The amount of resource commitment from the NPDES Wastewater Unit for the PFAS investigation is unknown at this time, but the investigation has been deemed a high

priority by the State Water Board and has the potential to divert NPDES Wastewater Program staff resources away from other division priorities.

PY Allocation for FY 19/20: 0.2 PY

2.c– Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Wastewater Program staff are active participants in the statewide NPDES Wastewater Program. Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments as well as provide input on the development of statewide general orders and technical policy. It is anticipated that in FY 19/20, NPDES Wastewater Program staff will participate in a special Investigation currently being undertaken/led by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve: The NPDES Wastewater Program has been understaffed since the departure of one WRCE in January 2019. The vacancy is expected to be filled by the second quarter of FY 2019-20. The amount of resource commitment from the NPDES Wastewater Unit for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert NPDES Wastewater Program staff resources away from other division priorities.

PY Allocation for FY 19/20: 0.1 PY

3.2 Performance Targets

3.2.1 Reported to State Board via ORPP

The Performance Target for the NPDES Wastewater program that is reported to the State Water Board is based on the number of major and minor wastewater facilities inspected and major and minor individual permits renewed. The following table shows our targets for FY 19/20.

Performance Targets for the last FY and proposed for FY 19/20

Fiscal Year	Major Facilities Inspected	Major Facilities Permits Renewed	Minor Facilities Inspected	Minor Facilities Permits Renewed
Target 2018-2019	9	2	3	7
Actual 2018-2019	11	3	5	4
Target 2019-2020	6	3	5	5

Due to limited NPDES Unit staff resources (as of early July 2019, there has been one vacancy in the unit for 6 months), competing priorities, and emerging permit issues, NPDES permit renewals are subject to delays. Current Wastewater vacancy recruitment resulted in a single applicant and will likely need to re-advertise.

4.0 NPDES STORMWATER PROGRAM

4.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 3. Most are described in detail in Section 4.2.

Table 3 – FY 19/20 Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	Category	Target Date
1	a. Manage NPDES permit NOIs and NOTs (0.3)	Core	On-going
1	b. Conduct site and facility inspections (0.85)	Core	On-going
1	c. Conduct enforcement actions (1.2)	Core/Special	On-going
1	d. Conduct general case handling tasks (0.5)	Core	On-going
1	e. Conduct Stakeholder Outreach (0.45)	Core	On-going
1	f. Update Phase I MS4 Permit (0.3)	Core	On-going
2	a. Participation in Development of Statewide General Orders and Initiatives (0.2)	Core	On-going

Categories: Categories are marked as either **Core** or **Special**

4.2 Core Activity and Project Descriptions

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

1.a – Manage NPDES Permit Notices of Intent (NOIs) and Notices of Termination (NOTs)

Summary: NPDES Stormwater Program staff plan to enroll under the Phase I Permit three existing, but currently unpermitted, entities: Sonoma Marin Area Rail Transit (SMART) Train, Sonoma State University, and Santa Rosa Junior College. Enrollments and terminations of coverage under the statewide Industrial General Permit and the statewide Construction General Permit occur throughout the year.

Key Issues to Resolve: The NPDES Stormwater Program currently has 1.0 PY dedicated to implementing the MS4 program in the North Coast Region. The work effort to enroll and provide initial compliance assistance to new enrollees under the Phase I and Phase II MS4 permits is unpredictable. Where significant enrollment assistance is needed, competing work priorities for the Municipal Stormwater Program, such as report review and follow up, may be delayed.

PY Allocation for FY 19/20: 0.3 PY

Milestones	Target Date
<i>Outreach to newly named Phase 1 entities</i>	<i>December 2019</i>

<i>Other General Permit enrollments</i>	<i>On-going</i>
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1.b – Conduct Site and Facility Inspections

Summary: A core responsibility of NPDES Stormwater Program staff is the inspection of regulated sites and facilities to determine compliance with NPDES permit requirements. In addition to a physical site inspection, inspections include a thorough review of the site/facility file, relevant work plans, monitoring reports, and Storm Water Pollution Prevention Plans.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.85 PY

Milestones	Target Date
<i>Conduct Site and Facility Inspections</i>	<i>On-going</i>

1.c – Conduct Enforcement Actions

Summary: Currently, the Unit Supervisor, Division Chief, Groundwater Specialist and two technical staff (one stormwater program staff and one cleanups program staff) are allocating time to three high priority enforcement actions in the Industrial and Construction Stormwater Programs that are being developed in conjunction with the State Water Board’s Office of Enforcement. It is anticipated that approximately 0.8 PYs will be dedicated to completing these enforcement actions in FY 19/20. Other low-priority enforcement actions are expected to occur during FY 19/20 that will account for an additional 0.4 PYs of staff resources. Enforcement actions may include one or multiple site inspections, collecting samples, writing enforcement documents, providing compliance support, and developing formal enforcement documents, briefing materials for management, and board presentations.

Key Issues to Resolve: The work effort to complete formal enforcement actions is unpredictable. Unexpected complications in development of formal enforcement actions have the potential to delay completion of an enforcement action or settlement may result in early completion of the action. If any of the enforcement cases go to hearing, additional staff resources will be needed, and other program priorities may not be completed.

PY Allocation for FY 19/20: 1.2 PY (0.8 PY for Unit Supervisor, Division Chief, Groundwater Specialist and other Division staff members)

Milestones	Target Date
<i>Construction Site Enforcement Action No. 1</i>	<i>September 2019</i>
<i>Construction Site Enforcement Action No. 2</i>	<i>December 2019</i>
<i>Industrial Site Enforcement Action No. 1</i>	<i>December 2019</i>
<i>Other enforcement actions</i>	<i>On-going</i>

1.d– Conduct General Case Handling

Summary: General (non-enforcement) case handling tasks include spill response, regular meetings with Permittees, CEQA project review, Low Impact Development (LID) review, reviewing and approving submittals through SMARTS, responding to public records requests, providing technical guidance to implementers, and responding to public inquiries.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.5 PY

Milestones	Target Date
<i>Conduct General Case Handling</i>	<i>On-going</i>

1.e– Conduct Stakeholder Outreach and Public Engagement

Summary: Stakeholder outreach is key to the successful implementation of stormwater management under both the statewide general permits and individual NPDES permits. Public outreach and early engagement are proven strategies to inform stakeholders about the need to manage stormwater and the benefits of doing so and educate the regulated community about the requirements of the permits for stormwater. NPDES Stormwater Program staff propose to dedicate 0.45 PY in FY 19/20 for stakeholder outreach and public engagement. The intended tasks include proactive engagement with existing industry groups such as contractor groups, builders associations and commercial sea food processors, municipal building and engineering inspectors, and schools.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.45 PY

Milestones	Target Date
<i>Coordinate with MS4 permittees and State Water Board staff</i>	<i>On-going</i>

1.f– Renew Phase I MS4 Permit

Summary: The North Coast Region’s Phase I MS4 permit expires in 2020. NPDES Stormwater Program staff will begin work in FY 19/20 on renewal of this permit, which is expected to occur in FY 20/21.

Key Issues to Resolve: The NPDES Stormwater Program currently has 1.0 PY dedicated to implementing the MS4 program in the North Coast Region. Competing work priorities for the Municipal Stormwater Program have the potential to delay work on this permit renewal.

PY Allocation for FY 19/20: 0.3 PY

Milestones	Target Date
<i>Begin development of Phase I MS4 Permit renewal</i>	<i>December 2019-June 2020</i>

2.a – Participation in Development of Statewide General Orders and Initiatives

Summary: NPDES Storm Water Program staff are active participants in the statewide NPDES Storm Water Program. Regional Water Board staff regularly attend statewide Program roundtable meetings and participate in technical working groups to resolve statewide issues and assist State Water Board staff in meeting program commitments as well as provide input on the development of statewide general orders and technical policy. It is anticipated that in FY 19/20, NPDES Storm Water Program staff will participate participating in the development of statewide permits for the Phase II MS4 General Permit, the statewide Caltrans Storm Water Permit, Industrial Storm Water Permit, and the Statewide Trash Amendment implementation plan.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.2 PY

Milestones	Target Date
<i>Participate in statewide efforts</i>	<i>On-going</i>

4.2 Performance Targets

4.2.1 Reported to State Board via ORPP

Performance Targets for the last FY and proposed for FY 19/20

Fiscal Year	Municipal Phase I/II Inspections	Construction Inspections	Industrial Inspections
Target 2018-2019	4	40	40
Actual 2018-2019	4	65	26
Target 2019-2020	4	40	40

During the 2018-19 fiscal year, the storm water program had vacancies in both the Industrial and Construction stormwater positions, as well as in the NPDES Unit Supervisor and Division Chief positions for a significant portion of the year. In order to meet the required inspection targets, provide compliance assistance, and to prepare follow-up enforcement actions, an interdisciplinary team was assembled that included staff from the Cleanups, Enforcement, and Cannabis units, with leadership from the Assistant Executive Officer, Groundwater Protection Specialist, and the newly hired NPDES Unit Supervisor. U.S. EPA also provided technical staff to assist with inspections. This team worked diligently to inspect construction sites and industrial facilities, and conduct necessary enforcement actions.

5.0 WASTE DISCHARGE TO LAND PROGRAM

5.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 4. Some are described in detail in Section 5.2.

Table 4 – FY 19/20 Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	Category	Target Date
1	a. Prepare New WDRs and General WDR Enrollments (0.4)	Core	Ongoing
1	b. Prepare Revised WDRs and Rescission Orders for existing Facilities (0.5)	Core	Ongoing
1	c. Provide technical and compliance assistance to Disadvantaged Communities (0.7)	Special	Ongoing
1	d. Conduct stakeholder outreach for Russian River Watershed Pathogen TMDL Early Implementation (0.3)	Special	Ongoing
1	e. Review/Approve Local Agency Management Programs (0.2)	Special	Ongoing
2	a. Review Self-Monitoring Reports and Conduct Follow up (0.2)	Core	Ongoing
2	b. Respond to State Water Board WDR Program requests and participate in development of statewide general permits (0.3)	Special	Ongoing
2	c. Conduct Facility inspections and prepare inspection reports (0.4)	Core	Ongoing
3	a. Respond to complaints and emerging Facility issues (0.1)	Core	Ongoing

Categories: Categories are marked as either **Core** or **Special**

5.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 4 above.

1.a - Prepare New WDRs and GWDRs Enrollments

Summary: 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. In FY 2019-20, Staff plans to prepare two new draft individual WDR for Board consideration and adoption and approximately 20 new enrollments under general WDRs. The number of new permits and enrollments completed is dependent on the number of new applications received during the fiscal year, which is unpredictable, and competing work priorities.

Compared to individual WDRs, general WDRs have more streamlined monitoring and reporting requirements and are routinely updated, reducing the long-term case management burden on Unit staff.

Key Issues to Resolve: Cal/EPA's Bill of Rights for Environmental Permit Applicants states that agencies must notify permit applicants within 30 days of receipt of applications of any deficiencies or determine that the application is complete. Due to limited staff resources, Groundwater Permitting staff has been unable to meet this standard.

PY Allocation for FY 19/20: 0.4 PY

New WDR Order Issuance	Target Date
Lewiston Community Services District WWTP	March 2020

<i>Willow Creek Community Services District WWTP</i>	<i>June 2020</i>
<i>General WDR Order Enrollments</i>	<i>Ongoing</i>

1. b – Prepare Revised WDRs and Rescission Orders for Existing Facilities

Summary: Unlike NPDES permit, which are renewed every five years, non-NPDES WDRs continue in force until they are rescinded or revised. Non-NPDES WDRs are periodically reviewed every five, ten, or fifteen years, based on the regulated discharge’s Threat to Water Quality and Complexity (TTWQ/CPLX) rating, to reaffirm the adequacy of the WDRs and to determine whether the WDRs should be revised to incorporate new regulatory or policy changes that have occurred since the WDRs were originally adopted or last reviewed. Based on a review of the region’s existing WDRs, the Groundwater Permitting staff plans to update five individual WDRs during FY 2019-20. Updates are planned for the following facilities:

Existing WDR Order Revision	Target Date
<i>1. Bodega Bay Public Utility District WWTP</i>	<i>December 2019</i>
<i>2. Gualala Community Services District WWTP</i>	<i>March 2020</i>
<i>3. North Marin County Water District Oceana Marin WWTP</i>	<i>March 2020</i>
<i>4. Roseburg Forest Products Weed Veneer Plant</i>	<i>June 2020</i>
<i>5. City of Yreka WWTP</i>	<i>June 2020</i>

In some cases, particularly for low threat discharges, facilities regulated under individual WDRs may be more appropriately regulated under the statewide general WDRs for small domestic wastewater treatment systems or under local agency oversight for OWTS with wastewater flows under 10,000 gallons per day. 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. The Groundwater Permitting Unit anticipates preparing one large rescission order during FY 2019-20 that will rescind up to ten existing individual WDRs, primarily for OWTS with wastewater flows under 10,000 gallons per day and thus are eligible for oversight by a local agency and wineries that are eligible for regulation under the regional general order for wine, beverage, and food processors, or the future statewide winery general permit for wineries that is currently under development by the State Water Board.

Key Issues to Resolve: Due to limited Groundwater Permitting staff resources, competing priorities, and emerging permit issues, WDR reviews and updates for out-of-date WDRs are subject to delays. Also, updates to WDRs that authorize the production and use of Recycled Water may experience delays due to the need for the Permittee to prepare and obtain approval from the State Water Board’s Division of Drinking Water of a Title 22 Engineering Report prior to adoption of WDRs.

PY Allocation for FY 19/20: 0.5 PYs

1. c and d – Conduct Technical and Compliance Assistance to DACs and Stakeholder Outreach for Russian River Watershed Pathogen TMDL Implementation

Summary: The Groundwater Permitting Unit will continue efforts from FY 2018-19 by providing technical and compliance assistance to disadvantaged communities (DACs) to advance the

Human Right to Water and to improve access to public funding for wastewater treatment and disposal projects. As of June 1, 2019, Unit staff is currently assisting over 25 local agencies that have applied for public funding assistance through the California Clean Water State Revolving Fund (Small Community Grant Program).

Also expected in FY 2019-20 is continued early implementation activities for the Russian River Watershed Pathogen TMDL, work that includes public outreach to owners of onsite wastewater treatment system (OWTS) in the lower Russian River area and coordination with local agencies and other stakeholders identified as implementing entities in the TMDL Action Plan. After adoption of the Russian River Watershed Pathogen TMDL, which is anticipated in August 2019, Groundwater Permitting Unit staff will begin preparation of 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. Implementation of this program is expected to require significant staff resources during FY 2019-20 and for the coming years.

Key Issues to Resolve: Currently, the Unit Supervisor, Division Chief, and one regular staff are allocating time to these high priority tasks instead of other core activities such as inspections, SMR review, and WDR reissuance. The commitment of staff time for these Special Projects, diverting resources from core activities, is unsustainable. Beginning in FY 20/21, the North Coast Regional Water Board will be receiving 1.0 PY to implement new sewer service authorities for DACs provided by Senate Bill 1215 (Hertzberg), which was signed into law and became effective on January 1, 2019. A portion of this 1.0 PY will be dedicated to development and implementation of sustainable wastewater solutions (e.g. OWTS upgrades, septic to sewer projects) in Russian River Watershed communities including DACs.

PY Allocation for FY 19/20: 1.2 PYs (0.7 PYs for technical and compliance assistance to DACs and 0.5 PYs for Russian River TMDL implementation)

1. e – Review/Approve Local Agency Management Programs

Summary: The OWTS Policy authorizes local agencies to regulate new and replacement OWTS using a Local Agency Management Program (LAMP) consistent with Tier 2 of the OWTS Policy instead of regulating new and replacement OWTS under the OWTS Policy's more prescriptive Tier 1 requirements. Prior to local agency implementation of a LAMP, the draft LAMP must be reviewed by Regional Water Board staff and approved by the Regional Water Board or the State Water Board. As of the beginning of FY 2019-20, Humboldt County and Mendocino Counties are implementing approved LAMPs. The County of Sonoma has completed a lengthy and contentious public process to finalize a draft LAMP for its submission to the Regional Water Board for approval. A public hearing for the Regional Water Board to consider a resolution approving the Sonoma County LAMP is scheduled for early FY 2019-20. The Counties of Del Norte and Siskiyou have also submitted draft LAMPs to the Regional Water Board for approval. Groundwater Permitting Unit staff anticipates ongoing work with staff from these local regulatory agencies to finalize the draft LAMPs and prepare Regional Water Board resolutions approving the LAMPs. Until these LAMPs are approved by the Regional Water Board, new and replacement OWTS are regulated under Tier 1 requirements.

As of June 1, 2019, the County of Trinity has not submitted a draft LAMP to the Regional Water Board for approval. Consequently, new and replacement OWTS in this county are regulated under Tier 1 requirements.

LAMPs for Modoc, Lake, and Glenn Counties were approved in FY 18/19 by other regional water boards. OWTS in these counties and within the boundaries of the north coast region are regulated under requirements of the approved LAMPs.

Key Issues to Resolve: The Counties of Del Norte, Siskiyou, and Trinity have limited staff resources for preparing a LAMP. Consequently, completion of LAMPs that can be approved by the Regional Water Board will require significant coordination with Groundwater Permitting Unit staff during the development and review process. Due to limited Groundwater Permitting staff resources and competing priorities, coordination efforts with local agency staff may be delayed.

PY Allocation for FY 19/20: 0.2 PYs

2. a – Review Self-Monitoring Reports and Conduct Follow up

Summary: Regulated facilities prepare and submit self-monitoring reports (SMRs) to document their facility's 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. Groundwater Permitting Unit staff have committed to review 40 SMRs in FY 2019-20, focusing on facilities whose compliance history has been inconsistent.

Key Issues to Resolve: Due to limited Groundwater Permitting staff resources and competing priorities, the number of SMR reviews has declined in recent years. Consequently, Staff may be unaware of ongoing permit violations. Additional staff resources would improve Unit staff's ability to review SMRs for all regulated facilities and provide timely response to permit violations.

PY Allocation for FY 19/20: 0.2 PYs

2. b – Respond to State Water Board Program Requests and Participate in Development of Statewide General Permits

Summary: In addition to providing guidance to the nine regional water board to ensure statewide consistency within the State Water Board's WDR Program, 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 19/20, Groundwater Permitting Unit staff will continue assisting State Water Board staff in their development or renewal of general permits for wineries, sanitary sewer systems, and aggregate and concrete facilities. It is also anticipated that in FY 19/20, Groundwater Permitting Unit staff will participate in at least one special Investigation currently being undertaken by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve: The amount of resource commitment from the Groundwater Permitting Unit is for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert Groundwater Permitting Staff resources away from other division priorities.

PY Allocation for FY 19/20: 0.3 PYs

2. c – Respond to Complaints and Emerging Facility issues

Summary: Groundwater Permitting Unit staff receive complaints and reports of environmental concerns from the public via direct phone calls, notices from the Governor's Office of Emergency Services (OES), and reports transferred to staff from CalEPA's online environmental

complaint system. In many cases, these reports are referred by Unit staff to the appropriate local enforcement agency for follow up; in other case, Unit staff may respond to the complaint with a site inspection. Groundwater Permitting Unit staff anticipate conducting approximately three complaint inspections in FY 2019-20 (tracked as “other inspections” under performance targets for this program).

Groundwater Permitting Unit staff also 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.

Key Issues to Resolve: Due to limited Groundwater Permitting staff resources and competing priorities, complaint response and facility “case handling” has declined in recent years. Additional staff resources would improve Unit staff’s ability to provide timely response to public complaints/concerns and provide case handling services to regulated facilities.

PY Allocation for FY 19/20: 0.1 PYs

2.d – Conduct Facility Inspections and Prepare Compliance Inspection Reports.

Summary: Routine compliance inspections are important tools to ensure that regulated facilities are in compliance with waste discharge requirements and provides 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. There is no established minimum inspection frequency for facilities regulated under non-NPDES permits; however, Groundwater Permitting Unit staff try to visit each municipal wastewater treatment facility permitted facility every 3-4 years, or more frequently for facilities with higher TTWQ/Complexity ratings. Other regulated facilities, such as wineries, campgrounds, and mobile home parks, are inspected on a much less frequent basis. The table below indicates the proposed 35 inspections for FY 2019-20.

Key Issues to Resolve: Due to limited Groundwater Permitting Unit staff resources and competing priorities, the number of compliance inspections of regulated facilities conducted by Staff has declined in recent years. Additional staff resources would help increase the number of compliance inspections conducted each year.

PY Allocation for FY 19/20: 0.4 PYs

Municipal Facility Inspection	Target Date
1. <i>Rohnert Park Water Reclamation System</i>	<i>September 2019</i>
2. <i>Airport-Larkfield Wikiup WWTF</i>	<i>September 2019</i>
3. <i>Smith River Rancheria WWTP</i>	<i>September 2019</i>
4. <i>Virginia Dare Winery WWTP</i>	<i>September 2019</i>
5. <i>Francis Ford Coppola Winery WWTP</i>	<i>September 2019</i>
6. <i>Graton Rancheria (formerly Salvation Army WWTF)</i>	<i>September 2019</i>

7. <i>CalFire High Rock Conservation Camp WWTP</i>	<i>September 2019</i>
8. <i>Tulelake WWTP</i>	<i>December 2019</i>
9. <i>City of Yreka WWTP</i>	<i>December 2019</i>
10. <i>Lewiston CSD WWTP</i>	<i>December 2019</i>
11. <i>Trinity County Waterworks District #1 Hayfork WWTP</i>	<i>December 2019</i>
12. <i>Newell County Water District WWTP</i>	<i>December 2019</i>
13. <i>US Coast Guard Petaluma Two Rock WWTP</i>	<i>December 2019</i>
14. <i>Bodega Bay PUD WWTF</i>	<i>December 2019</i>
15. <i>Weaverville SD WWTP</i>	<i>December 2019</i>
16. <i>City of Blue Lake WWTP</i>	<i>December 2019</i>
17. <i>Samoa Townsite WWTP</i>	<i>December 2019</i>
18. <i>Dharma Realm Buddhist Talmage</i>	<i>December 2019</i>
19. <i>City of Weed WWTP</i>	<i>March 2020</i>
20. <i>City of Dorris WWTP</i>	<i>March 2020</i>
21. <i>Macdoel WWTP</i>	<i>March 2020</i>
22. <i>Caltrans Collier Rest Area WWTP</i>	<i>March 2020</i>
23. <i>Oceana Marin WWTP</i>	<i>March 2020</i>
24. <i>Geyserville Sanitation Zone WWTP</i>	<i>March 2020</i>
25. <i>USACOE Lake Mendocino WWTP</i>	<i>March 2020</i>
26. <i>Hopland PUD WWTP</i>	<i>March 2020</i>
27. <i>Calpella Water District WWTP</i>	<i>March 2020</i>
28. <i>Happy Camp WWTP</i>	<i>June 2020</i>
29. <i>City of Ukiah WWTP Recycled Water System</i>	<i>June 2020</i>
30. <i>JH Ranch WWTP</i>	<i>June 2020</i>
31. <i>City of Montague WWTP</i>	<i>June 2020</i>
32. <i>La Crema Winery</i>	<i>June 2020</i>
33. <i>Wilson Winery</i>	<i>June 2020</i>
34. <i>De Lorimier Winery</i>	<i>June 2020</i>
35. <i>Asti Winery</i>	<i>June 2020</i>

5.3 Performance Targets

5.3.1 Performance Targets for FY 18/19

FY 18/19 performance targets for the Groundwater Permitting Unit were not achieved. Delays in Regional Water Board approvals of Local Agency Management Programs (LAMPs) for Mendocino County and Sonoma County delayed the anticipated transfers of oversight of up to 12 OWTS currently regulated by state-issued permits to local oversight. These transfers would have required rescission of certain individual WDRs at the time local permit oversight was assumed. Regional Water Board staff slowed the planned pace of enrollments under regional general WDRs and waivers for wineries due to the uncertainty regarding the adoption date of the statewide winery permit, which will supersede the regional WDR and waiver for regulation of wineries. Fewer inspections were completed than planned due to an injury to one program staff that prevented field work for that staff for much of FY 18/19. The inability of this staff person to do field work resulted in greater number of SMR reviews for FY 18/19.

Review of Performance Targets for FY 18/19

	Target Tasks					
	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
2018-19 Target	4	20	9	27	3	40
2018-19 Completed	0	15	8	20	0	415

5.3.2 Performance Targets for FY 19/20 (Proposed)

Performance Targets for FY 19/20

	Target Tasks					
	Rescission Orders	GWDRs and Waiver Enrollments	WDRs Adoptions	Compliance Inspections	Other Inspections	SMR Review
Target	10	20	7	35	0	40

6.0 SOLID WASTE DISPOSAL PROGRAM

6.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 5. Some are described in detail in Section 6.2.

Table 5 – FY 19/20 Program Core Activities and Projects by Priority

Priority Level	Activity/Project (PYs)	Category	Target Date
1	a. Adopt Final Closure WDRs for 2 Solid Waste Disposal Sites (0.8)	Core	June 2020
1	b. Complete Composting Operations GWDR enrollments (0.2)	Core	September 2019
1	c. Conduct facility oversight, inspections, case handling (0.2)	Core	Ongoing
1	d. Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site (0.5)	Core	September 2019
1	e. Update Monitoring and Reporting Programs (0.1)	Core	Ongoing
2	a. Review facility Financial Assurance documents (0.1)	Core	Ongoing
2	b. Respond to State Water Board WDR Program requests (0.1)	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

6.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 5 above.

1.a – Adopt Final Closure WDRs for 2 Solid Waste Disposal Sites

Summary: Land Disposal Staff plan to prepare final closure plans for two solid waste disposal sites: the Mendocino County South Coast and the City of Ukiah Solid Waste Disposal Sites. Land Disposal Staff is reviewing design documents and preparing WDRs for final closure of the Mendocino County South Coast Solid Waste Disposal Site. The South Coast Solid Waste Disposal Site, located in Caspar, is no longer receiving municipal solid waste and the existing waste management unit is protected by an interim cover. The County has proposed an engineered alternative cover design (artificial turf) that is new to the North Coast Region. Regional Water Board staff work includes review of daily reports prepared in accordance with the approved Construction Quality Assurance (CQA) Plan.

Key Issues to Resolve: Land Disposal staff is in discussions with County staff to resolve drainage issues related to the final design of the Mendocino County South Coast SWDS. Adoption of the proposed City of Ukiah Closure WDRs is dependent on the completion of a certified CEQA document. Active enforcement to complete Closure WDRs is being undertaken by CalRecycle. There is potential that the CEQA document may be challenged by the owner of a property neighboring the landfill, which could delay the timing of the permit adoption.

PY Allocation for FY 19/20: 0.8 PY

Milestones	Target Date
<i>Preparation and Adoption of Mendocino County Solid Waste Disposal Site Final Closure WDRs</i>	<i>March 2020</i>
<i>Preparation and Adoption of City of Ukiah Solid Waste Disposal Site Final Closure WDRs</i>	<i>June 2020</i>

1.b – Complete Composting Operation GWDR Enrollment

Summary: Land Disposal staff is reviewing Notices of Intent and technical reports for five composting operations located in the North Coast Region that are required to obtain coverage under the statewide General WDRs for Composting Operations (Order WQ 2015-0121-DWQ). Staff plans to issue notices of coverage to all currently enrollees by July 2019 and work with the enrollees to finalize their technical reports and work plans.

Key Issues to Resolve: None.

PY Allocation for FY 19/20: 0.2 PY

Milestones	Target Date
<i>Complete Composting Operation GWDR Enrollments</i>	<i>September 2019</i>

1.c – Conduct Facility Oversight, Inspections, and Case Handling

Summary: Land Disposal staff conducts routine facility oversight activities over the fiscal year. These activities typically include facility compliance inspections, inspection report preparation, facility work plan review, complaint response, permit enforcement, as well as response to reemerging issues at regulated facilities. Land Disposal staff has tentatively scheduled 15 compliance inspections for FY 2019-20. Other oversight activities are unpredictable and

therefore, unscheduled (for example, as a result of high precipitation, fire impacts, or other natural disasters).

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.3 PY

Land Disposal Facility Inspection	Target Date
1. Sonoma County Central SWDS (CQA Inspection)	September 2019
2. Sonoma County Central SWDS (Erosion Control Inspection)	September 2019
3. Crescent City SWDS	September 2019
4. Cummings Road SWDS	September 2019
5. Hely Creek Wood Waste Disposal Site (WWDS)	September 2019
6. Guerneville SWDS	December 2019
7. Table Bluff SWDS	December 2019
8. Yreka SWDS	December 2019
9. Tulelake SWDS	December 2019
10. Weed SWDS	December 2019
11. Healdsburg SWDS	March 2020
12. Annapolis SWDS	March 2020
13. Airport SWDS	March 2020
14. LP York Ranch SWDS	June 2020
15. Ukiah SWDS	June 2020

1.d – Review/approval of Work Plan/CQA Plan for Sonoma County Central SWDS

Summary: Land Disposal staff is reviewing design documents and preparing WDRs for construction of new, expanding waste management units at the Sonoma County Central SWDS. Design documents are anticipated in FY 19/20 (Q1) with construction documents delivered in FY 2020-21, pending capacity evaluation by the Discharger.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.5 PY

Milestones	Target Date
Review/approval of Work Plan/Construction Quality Assurance Plan for Sonoma County Central Solid Waste Disposal Site	September 2019-June 2020

1.e – Update Monitoring and Reporting Programs

Summary: Land Disposal Staff plan to update two Monitoring and Reporting Programs: Klamath (Green Diamond) WWDS and Sonoma County Annapolis Solid Waste Disposal Site.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

Milestones	Target Date
Klamath (Green Diamond) WWDS	March 2020
Sonoma County Annapolis	March 2020

2.a – Review facility Financial Assurance documents

Summary: All owners/operators of municipal SWDS are required to demonstrate that they will be able to pay for the required closure and post-closure care activities, and any corrective action that might become necessary due to releases of contaminants into the surrounding environment. Financial assurance documents are written, site-specific estimates that are prepared prior to commencement of landfill operations and must be adjusted annually during the active life of the waste management unit to account for inflation. Corrective action cost estimates are prepared when a release is detected and also must be adjusted annually during the period of the correction action. Annual updates to financial assurance documents are reviewed each year by the Regional Water Board Land Disposal staff for waste management units regulated under WDRs.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

2.b – Respond to State Water Board Program Requests

Summary: In addition to providing guidance to the nine regional water board to ensure statewide consistency within the State Water Board’s WDR Program, State Water Board staff often enlists the input of the regional water boards on emerging issues, regulatory updates, and development of statewide waste discharge requirements. In FY 19/20, Land Disposal Program will participate in a special Investigation currently being undertaken by the State Water Board to determine the presence of per- and polyfluoroalkyl substances (PFAS) in the environment and its contribution from facilities regulated under federal and state regulatory programs.

Key Issues to Resolve: The amount of resource commitment from the Land Disposal Program is for the PFAS investigation is unknown at this time, but the investigation has been deemed a high priority by the State Water Board and has the potential to divert additional staff resources away from other division priorities.

PY Allocation for FY 19/20: 0.1 PYs

6.2 Performance Targets

6.2.1 Performance Targets for FY 18/19

Unforeseen delays in receiving necessary documents resulted in delays in completing WDRs and their associated MRPs in the last fiscal year. Of the identified compost GWDRs, two are ready for enrollment letters, one was determined to be exempt, and two are pending submittal of corrected information from facility.

Table 6 – Performance Targets for the FY 18/19

	Target Tasks
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Point Source & Groundwater Protection Division
 Work Plan for FY 2019-2020

	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2018-19 Target	2	5	3	15	16	7
2018-19 Completed	0	0	7	28	23	23

6.2.2 Performance Targets for FY 19/20 (Proposed)

Performance Targets proposed for FY 19/20

	Target Tasks					
Fiscal Year	WDRs Adoptions	GWDRs and Waiver Enrollments	MRP Revisions	Compliance Inspections	SMR Review	Other Report Review
2019--20	2	5	2	15	16	7

7.0 UST/SITE CLEANUP/DoD PROGRAMS

7.1 Core Activities

The primary responsibilities of program staff are categorized based on priority listed in Table 6. Some are described in detail in Section 7.2.

Table 6 – FY 19/20 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	a. Reviewing and responding to submitted investigation and remediation reports and plans for open cases.	Core	Ongoing
1	b. Prepare and issue directive letters.	Core	Ongoing
1	c. Review all monitoring reports for open cases.	Core	Ongoing
1	d. Prepare enforcement actions	Core	Ongoing
1	e. Keep all records up to date.	Core	Ongoing
1	f. Manage case work time to match budgeted program hours.	Core	Ongoing
2	g. Perform site inspections.	Core	Ongoing
2	h. Review stalled case load and determine next actions to move stalled cases forward (e.g., enforcement, contacting new property owners, etc.)	Core	Ongoing

Categories: Categories are marked as either **Core** or **Special**

7.2 Core Activity and Project Descriptions

The main 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, Site Cleanup, Department of Defense. 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 certain case load (can be up to 50 cases/sites per staff person).

The core activities are generally the same for each of the three programs. Tasks 1.a, 1.b, 1.c, 1.e, and 2.g are part of regular case management work, in which staff review and respond to reports and plan, send directive letters, manage records, and perform site inspections. Sometimes for a case, staff prepare and issue enforcement actions (task 1.d).

Some cases in each program are stalled, and no work on the site is proceeding. Cleanup staff review these to determine the reason for the stall and take various actions to move the case forward again. Enforcement is one tool for this, but sometimes the properties have changed hands or responsible parties are no longer available and staff have to investigate all potentially new responsible parties and involve them in the project. Also, if the responsible parties have insufficient funds to do the needed work but are willing, we help investigate other funding possibilities.

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

Case Work Prioritization

Below is a list of considerations used in prioritizing cleanup cases:

1. Impacts to water supply wells, indoor air contamination, direct 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. Redevelopment
6. Cooperation or recalcitrance of responsible parties; funding availability
7. Public interest
8. Achieving case closure
9. Others

Program and Additional Tasks Descriptions

Underground Storage Tank (UST) Cleanup Program

Summary: 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).

We currently have 149 open cases.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 4.3 PY within the unit, 2.4 PY used to support positions outside the unit

Site Cleanup Program

Summary: 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 for billing purposes and must also keep within budgeted time.

We also have some personnel time from the State Board's Site Cleanup Subaccount to work on non-cost recovery cases as well as work on cases using grant money from the Site Cleanup Subaccount.

We currently have 248 open SCP cases.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 3.4 PY

Department of Defense (DoD) Cleanup Program

Summary: 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. We currently have open cases for approximately 18 FUDS, though many of the former facilities have multiple sub-sites. 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.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

Spill response

Summary: The site cleanup unit respond to some of the hazardous material spill reports that our agency receives. Any spill that will involve significant cleanup work overseen by our agency become cases, and are thus covered under task 1.b. However, we receive other spill reports that require our attention, often times at the request of local agencies overseeing the immediate spill response, that only require interagency consultation and perhaps a site inspection. When significant oversight time is not anticipated, these responses do not become cases, and are covered with SCP program overhead funding.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

Respond to public inquiries on closed cases or non-case property evaluations.

Summary: Our agency receives multiple public inquiries a week involving closed cases or properties that are not currently cases but are being evaluated for potential contamination from former operations. These inquiries often arise out of redevelopment, potential property transfers, or refinancing, and may be part of a Phase I Environmental Site Assessment for the property. As many of these inquiries are time sensitive and may depend on information or responses that only our agency can provide, responding to the inquiries and providing relevant records is considered a high priority.

In addition, we receive Phase II Environmental Site Assessments, involving actual soil and groundwater sampling, not under our oversight, at a property to investigate potential contamination. While some of these documents report releases that will necessitate our oversight and direction as new UST or SCP cases, many of these documents report investigation findings that do not warrant oversight by our agency. Receiving the feedback from our agency that we would not require further work can be important to redevelopment. Thus, we try to provide such evaluations and responses in a timely manner.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 PY

7.3 Performance Targets

The general goal with the cases is to define the extent of contamination, remediate the contamination as necessary, verify remediation sufficiency through additional testing and monitoring, and institute any necessary engineering or institutional controls to prevent future exposures. Upon successful completion of this process, the case is closed. This ties into the ORPP tracked goals for the programs: number of new cases moved into remediation and number of cases closed.

7.3.1 Reported to State Board via ORPP

Performance Targets for FY 18/19 and proposed for FY 19/20

FY 18/19 Performance Targets	Target	Reported
# of DoD Sites New into Active Remediation	0	1
# of SCP Sites New into Active Remediation	4	8
# of SCP Sites Projected Closed	4	8
# of UST Sites New into Active Remediation	5	3
# of UST Sites Projected Closed	10	8

FY 19/20 Performance Targets	Target
# of DoD Sites New into Active Remediation	0
# of SCP Sites New into Active Remediation	4
# of SCP Sites Projected Closed	4
# of UST Sites New into Active Remediation	5
# of UST Sites Projected Closed	10

8.0 GROUNDWATER PROTECTION PROGRAM

8.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 7.

Table 7 – Groundwater Protection Strategy

Priority Level	Activity/Project	Category	Deadline Final Deadline, not FY milestones
1	a. Develop a Draft Phase II Basin Plan Amendment & Policy Statement for Regional Water Board Consideration	Core	June 2021
1	b. Conduct Data Screening and Basin Wide Groundwater Quality Assessments	Core	January 2019 (completed)
1	c. Update Orders office-wide to include groundwater protection control measures	Core	On-going
2	a. Participate in the Statewide Emergency Response Technical Working Group	Special	On-going
2	b. Assist in the development and implementation of the Statewide Source Water Protection Action Plan	Special	On-going
2	c. Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team	Core	On-going
3	a. Participate in the Constituent of Emerging Concern Initiative	Special	On-going
3	b. Conduct special investigations at sites where there is a threat to groundwater quality	Special	On-going

Categories: Categories are marked as either **Core** or **Special**

8.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 7 above.

1.a – Develop the Phase II Basin Plan Amendment and Policy Statement

Summary: *The Groundwater Protection Strategy* is intended to develop a *Policy Statement in Support of Maintaining High-Quality Groundwater* as part of the Phase II Basin Plan Amendment (BPA). The Phase II BPA will propose a programmatic approach to managing salts and nutrients in groundwater, as per the Statewide Recycled Water Policy; update Table 2-1 to include beneficial uses for individual groundwater basins, where appropriate; provide considerations for groundwater recharge, and provide editorial corrections and clarifications to Chapter 4 of the Basin Plan.

Key Issues to Resolve: Staff have made progress on the draft BPA and Policy Statement; however, the timeline needs to be adjusted because the Senior Specialist was reassigned to assist with other program vacancies. In June and July 2018, the Senior Specialist served as the interim Senior Supervisor of the NPDES Unit. Subsequently, the Senior Specialist was assigned to lead a team of staff to develop and implement a vigorous construction and industrial storm water inspection program through the Fall/Winter of 2018/2019. As a result of various inspections conducted, staff resources will remain diverted to develop enforcement actions. Therefore, further development of the BPA and Policy Statement will be delayed until the completion of these enforcement actions.

PY Allocation for FY 19/20: 0.25 Senior Specialist and various PY fractions from team members in the Cleanups Unit, NPDES Unit and Enforcement Unit.

Milestones	Target Date
<i>Basin Plan Amendment & Policy Statement</i>	<i>June 2021</i>

1.b – Conduct Data Screening and Basin Wide Groundwater Quality Assessments

Summary: The Groundwater Strategic Team has identified the development of procedures to assess the conditions of water quality and potential risks to beneficial uses at basin/aquifer scale as a priority project. In order to support the development of Phase II BPA and utilize a data-driven adaptive management approach for groundwater protection, it is necessary to screen each priority basin⁷ for salts, nutrients and other constituents of concern (COCs). The North Coast Region contains 58 groundwater basins⁸. The combined priorities of the Groundwater Ambient Monitoring and Assessment (GAMA) Program and Department of Water Resources (DWR) Sustainable Groundwater Management Act (SGMA) efforts result in 18 priority basins within the North Coast Region. The primary objective of this effort is to broadly assess the conditions of the 18 priority basins within the North Coast Region to evaluate the status, trends and further refine our understanding of anthropogenic effects on groundwater quality and potential risk to beneficial uses.

The scope of work includes:

1. Screen the GAMA database for salts, nutrients, and other constituents of concern in each of the 18 priority groundwater basins by comparing concentrations over time (e.g., 10 year averages, median values, individual well trends, and pollutant hot spots) to water quality standards (objectives, beneficial uses, and background water quality). To date, staff have completed the analysis for the priority basins and made the information available on our intranet site to support groundwater programs.
2. Screen the GAMA database for DWR well drillers logs to compile a record of potential sensitive receptors such as domestic, municipal and agricultural supply wells in each of the 18 priority groundwater basins. To date, staff have conducted several surveys to support priority groundwater protection programs (e.g. Dairy Program and waste discharges to land).
3. Develop a list of findings and program recommendations for each of the 18 priority basins. In progress.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.2 Senior Specialist and various PY fractions from team members.

Milestones	Target Date
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⁷ AB 599 requires the monitoring framework to use public-supply wells as the primary factor for basin ranking in conjunction with several secondary factors. Six individual factors are used to rank ground-water basins: (1) area, (2) number of public-supply wells, (3) municipal ground-water use, (4) agricultural ground-water use, (5) number of leaking underground fuel tanks, and (6) number of square-mile sections with registered use of pesticides. Given these factors, four categories or priority basins are identified. A fifth category includes public supply wells outside mapped basins; and a sixth category includes the remaining “low use” basins.

⁸ As defined by DWR Bulletin 118

<i>Complete Basin Wide Assessment for TDS and Nitrate in the GAMA and SGMA Priority Basins</i>	<i>June 2020</i>
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1.c –Update Orders office-wide to include groundwater protection control measures

Summary: Continue to update and renew orders that are protective of groundwater resources. A high priority of the Groundwater Strategic Team is to provide support for improving groundwater protection efforts through our compliance programs by establishing baseline conditions for Regional Water Board staff to consider when developing permits and cleanup and abatement orders, antidegradation analysis, and monitoring and reporting programs. To date the team has provided data analysis and/or recommendations for:

- NPDES facilities including Humboldt Creamery, Healdsburg, Forestville, Graton, Sonoma-West Holdings, Cloverdale, Ukiah, McKinleyville, and Ferndale;
- The State Water Board General WDR for Cannabis Cultivation;
- Local agency management plans for Humboldt Co., Mendocino County, and Sonoma County;
- The Dairy Program WDR; and
- The Vineyard permit.

In FY 19-20, the Groundwater Strategic Team and Senior Specialist will continue to provide data analysis and recommendations for groundwater protection measures at various municipal and industrial facilities currently regulated under NPDES and WDR permits.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.2 Senior Specialist and various PY fractions from team members.

Milestones	Target Date
<i>Update NPDES permits and WDR orders with groundwater protection measures</i>	<i>On-going</i>

2.a – Participate in the Statewide Emergency Response Technical Working Group

Summary: The Emergency Response Technical Working Group (ERTWG) is a statewide effort to develop disaster preparedness plans, procedures, and tools for the State Water Board, Regional Water Board and Division of Drinking Water staff. This includes processing lessons learned from previous disasters, such as the fires of October 2017, to inform future decisions and promote more efficient and effective coordination when responding to emergency operations that potentially affect water quality.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.05 Senior Specialist

Milestones	Target Date
<i>Tied ERTWG & MCC recommendations</i>	<i>On-going</i>

2.b – Assist in the development and implementation of the Statewide Source Water Protection Action Plan

Summary: On July 1, 2014, the Drinking Water Program transferred from the California Department of Public Health to the State Water Board and was renamed to the State Water Board Division of Drinking Water. This transfer of responsibility aligns the state’s drinking water and water quality programs in an integrated organizational structure to best position the state to effectively protect water quality and public health, while meeting current needs and future demands on water supplies. The Source Water Protection Project is a State Water Board effort led by the GAMA unit to integrate program goals to support source water protection activities across divisions and offices at the Water Boards, as well as with applicable agencies, and to coordinate these efforts. The Source Water Protection Project will also create a central, online, public location for data supporting source water protection, including the ability to create source water protection plans and download data.

The purpose of the Source Water Protection Action Plan is to document current activities at the State and Regional Water Boards (Water Boards) that currently support protection of drinking water sources, and outline the actions the Water Boards can expand or develop in order to support and coordinate source water protection. Six categories of action items for the Action Plan were developed by the Source Water Protection work team. The categories are:

1. Collect, Standardize and Share Data
2. Increase Coordination within Water Boards and with Other Agencies
3. Identify and Pursue Policy Issues
4. Expand Funding Opportunities
5. Develop Public Messaging and Outreach
6. Enhance Regulatory Programs

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 Senior Specialist

Milestones	Target Date
<i>Assist with the development and implementation of a Source Water Protection Action Plan</i>	<i>On-going</i>

2.c – Further develop and strengthen external partnerships to support goals of the Groundwater Strategic Team

Summary: Developing and strengthening external partnerships is part of the Regional Water Boards vision and a core goal of the Groundwater Strategic Team. Staff plan to continue partnering with the following agencies:

- California Department of Fish and Wildlife
- Department of Water Resources
- Groundwater Resource Association
- Local cities, counties, and Groundwater Sustainability Agencies
- Local stakeholders including business and non-profit
- Nature Conservancy
- UC Davis
- U.S. Geological Services
- State Water Board

The purpose of developing and strengthening these partnerships is to achieve common goals and further groundwater protection efforts throughout the North Coast Region.

1. *Phase II Basin Plan Amendment:* Stakeholder outreach to support the Phase II BPA development and implementation.
2. *Basin Scale Groundwater Assessments:* Make groundwater data assessments available to the public to establish baselines and trends of groundwater quality.
3. *Sustainable Groundwater Management Act:* Engage and observe GSA formation and groundwater sustainability plan development to achieve common goals and ensure groundwater quality protection.
4. *Periodic Meetings and Presentations:* Coordinate with local GSA, cities, and counties to exchange information on groundwater policy, emerging tools, and the latest scientific findings.
5. *Statewide Policy Development:* Partnering with the State Water Board on development and implementation of the Recycled Water Policy, Source Water Protection Action Plan, and with local GSAs to ensure the unique characteristics of the North Coast Region is adequately represented and a focus remains on protecting high-quality waters.
6. *Groundwater/Surface Water Interaction:* Continue the Mark West Creek well log review project, engage cannabis and salmon interagency workgroup, and supporting locals on site-specific pilot projects that further our understanding of local hydrogeologic conditions throughout the region.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.05 Senior Specialist

3.a – Participate in the Constituent of Emerging Concern Initiative

Summary: The Water Boards have worked on several projects to monitor for Constituents of Emerging Concern (CECs) and to identify the CECs that are of the highest risk to human health and the environment. The long-term objective of the CEC initiative is to develop a statewide strategy to monitor and control CECs. Participation in this effort is necessary to:

- Make initial steps towards development of a statewide management strategy for CECs.

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- Improve coordination within the Water Boards on CEC-related issues.
- Make CEC vocabulary and definitions of terms consistent.
- Reduce frequency of duplicative CEC efforts.
- Make a transparent communication effort.
- Assess the status of State & Regional Water Boards and Division of Drinking Water CEC efforts and then build mechanisms to coordinate these ongoing efforts.
- Evaluate regional monitoring efforts and pilots project to assess novel approaches to monitoring and future monitoring priorities.
- Evaluate monitoring results to assess potential impacts to beneficial uses and integrate appropriate monitoring into our regulatory programs.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.05 Senior Specialist

3.b – Conduct special investigations at sites where there is a threat to groundwater quality

Summary: Several site-specific special investigations have been assigned to the Senior Specialist in the past two years to assess potential threats to groundwater quality in support of enforcement actions. The Senior Specialist provides expertise and recommendations on work needed to adequately assess groundwater impacts at these various sites. In FY 19-20, the Senior Specialist will continue to guide these investigations as well as any new special investigations as needed.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 0.1 Senior Specialist

8.2 Performance Targets

8.2.1 Reported to State Board via ORPP

No performance targets have been identified by ORPP for Groundwater Protection Program efforts to date.

9.0 AGRICULTURAL LANDS PROGRAM

9.1 Core Activities and Projects by Priority

The primary responsibilities of program staff are categorized based on priority listed in Table 8. Some are described in detail in Section 9.2.

Table 8 – FY 19/20 Program Core Activities and Projects by Priority

Priority Level	Activity/Project	Category	Target Date
1	a. Develop straw proposal for Vineyard Permit	Special	September 2019
1	b. Continue focused stakeholder group outreach	Special	December 2019
1	c. Develop administrative draft of Vineyard Permit	Special	Ongoing
1	d. Develop CEQA documents for Vineyard Permit	Special	Ongoing
1	e. Develop implementation work plan for Vineyard Permit	Special	Ongoing

Categories: Categories are marked as either **Core** or **Special**

9.2 Core Activity and Project Descriptions

Activities and projects are listed below and identified by the priority (1, 2, 3, etc.) and the letter (a, b, c, etc.) listed in Table 8 above.

1.a and b - Prepare Straw Proposal and Gather Stakeholder Input for New Agricultural Lands Vineyard Permit

Summary: The cornerstone to the agricultural lands program is the development of agricultural lands permits. The North Coast Region has one staff dedicated to this program for permit development. For FY 2019/20, the Groundwater Permitting Unit is developing a vineyard permit. The vineyard permit will apply to vineyards throughout the Region. Beginning in the first quarter of FY 2019/20, Staff will develop a straw proposal of the permit and utilize this to coordinate with stakeholders through a series of focused group meetings to be held throughout the North Coast Region. This stakeholder work is planned to continue through the end of Q2. Based on stakeholder feedback received during the focused group meetings, Staff will begin development of an administrative draft of the permit.

1.c and d - Prepare Administrative Draft and CEQA documents for New Agricultural Lands Vineyard Permit

Summary: Staff will develop the administrative draft permit and corresponding CEQA documents beginning in Q3. The administrative draft will include enrollment tiers relative to water quality risk, prohibitions, specifications, provisions, findings, as well as a monitoring and reporting plan and third-party requirements. Staff will also prepare the corresponding CEQA documents, which may include an initial study and mitigated negative declaration, as well as an economic analysis to document the anticipated environmental and economic impacts of permit implementation. Development of the administrative draft of the vineyard permit and CEQA

documents are scheduled to be completed in FY 20/21. Board adoption of the vineyard permit is planned for FY 21/22.

1.e - Prepare Implementation Work Plan for New Agricultural Lands Vineyard Permit

Summary: Staff will also begin to develop a vineyard permit implementation work plan in FY 19/20. A GIS database with relevant geo-spatial information will be created and utilized to monitor and track permit enrollment and reporting. This will allow staff to efficiently and effectively facilitate the expected enrollment of a large number of vineyard operations; conduct third-party oversight to ensure completion of Water Quality Farm Plans, monitoring and reporting; as well as oversee the anticipated outreach and education efforts, all of which will be included in permit implementation. Implementation is scheduled to begin after Board adoption of the permit in FY 20/21.

Key Issues to Resolve: None

PY Allocation for FY 19/20: 1.0 PY

Key Milestones	Target Date
<i>Develop straw proposal for Vineyard Permit</i>	<i>September 2019</i>
<i>Continue focused stakeholder group outreach</i>	<i>December 2019</i>
<i>Develop administrative draft of Vineyard Permit</i>	<i>Ongoing</i>
<i>Develop CEQA documents for Vineyard Permit</i>	<i>Ongoing</i>
<i>Develop implementation work plan for Vineyard Permit</i>	<i>Ongoing</i>