

## Policies for Variances, Salinity Variance Program, Salinity Exception Program



Betty Yee  
Senior Engineer

CV-SALTS Executive Committee Meeting, 22 May 2014

1

## Background

- Planning Processes In-Progress
  - SNMPs through CV-SALTS
  - Review of the WQOs in the Bay-Delta Plan
- NPDES Permitting
  - Final Effluent Limitations
  - Porter Cologne authorizes time schedules in WDRs but there are Compliance Schedule Limitations

CV-SALTS Executive Committee Meeting, 22 May 2014

2

## Regulatory History

- City of Manteca
  - R5-2004-0028
    - 700  $\mu$ mhos/cm April - August
    - 1000  $\mu$ mhos/cm September - March
  - State Water Board Order WQ 2005-0005
    - 1000  $\mu$ mhos/cm year round
- City of Tracy
  - R5-2007-0037
  - State Water Board Order WQ 2009-0003

CV-SALTS Executive Committee Meeting, 22 May 2014

3

## Options

- State Water Board Order WQ 2009-0003
  - TMDL for Old River
  - Site Specific WQOs
  - SNMPs through CV-SALTS
- Additional Options
  - Offsets
  - Variances
  - Water Quality Standards Implementation Strategies
  - Use De-designation

CV-SALTS Executive Committee Meeting, 22 May 2014

4

## VariANCES

- Used to establish NPDES permits when compliance with a water quality based effluent limitation is infeasible.
- Short-term
  - Can be used while a longer-term planning process is underway

## Proposed Amendments

- Variance Policy
- Salinity Variance Program
- Salinity Exception Program

## Proposed Variance Policy

- Variance Policy
  - All NPDES dischargers
  - Non-priority pollutants
  - Application requirements
    - Environmental Impacts
  - Implementation Conditions
    - Interim limitation
    - Pollution Prevention Plan
  - Ten Year Terms and Renewal
  - EPA Approval before Effective

## Proposed Salinity Variance Program

- Salinity Variance Program
  - Needed while SNMPs are in progress
  - POTWs
    - Limited ability to improve receiving water quality
    - Faced with treatment that would cause economic and social impacts
  - Salinity Constituents: EC, TDS, Cl, SO<sub>4</sub>, Na
  - Application requirements
    - Demonstrate participation in CV-SALTS
    - Plan to show continued participation in CV-SALTS
    - Salinity Reduction Study Work Plan
  - Implementation Conditions
  - Ten Year Terms and Renewal
  - No variances will be approved after 30 June 2019

## Proposed Salinity Exception Program

- Salinity Exception Program
  - WDR and conditional waivers
  - Salinity Constituents: EC, TDS, Cl, SO4, Na
  - Application requirements
    - Demonstrate participation in CV-SALTS
    - Plan to show continued participation in CV-SALTS
    - Salinity Reduction Study Work Plan
    - Environmental impacts
  - Implementation Conditions
  - Ten Year Terms and Renewal
  - No exceptions will be approved after 30 June 2019

## Proposed Amendments

- Water Conservation, Drought and Recycling
  - May cause increased concentrations in effluent
  - No demonstration in case study cities
  - Included in Variance Policy and Salinity Exception Program

## Questions

Betty Yee  
Regional Water Quality Control Board - Central Valley  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670  
916-464-4643  
betty.yee@waterboards.ca.gov