CV-SALTS Executive Committee Meeting, 14 August 2014

Item 5: Draft Grassland Bypass Project Waste Discharge Requirements (WDR)

Background

New waste discharge requirements (WDRs) are currently being prepared for Phase III of the Grasslands Bypass Project (GBP) in the Grasslands watershed sub-basin of San Joaquin River Basin. Initiated in 1996, the GBP has prevented subsurface drainage discharges with elevated levels of selenium, salt and boron from entering channels supplying wetland habitat by consolidating and then discharging the drainage via a portion of the San Luis Drain to Mud Slough and then to the Lower San Joaquin River (LSJR). In addition, the GBP has progressively reduced the loads of these constituents entering the LSJR by approximately 80%, 63% and 63%, respectively. Some of the activities that have led to these reductions include: in-valley treatment via drainage reuse at the San Joaquin River Improvement Project (SJRIP) facility; utilizing and installing a drainage recycling system to mix subsurface drain water with irrigation supplies under strict limits; continuing current land retirement policies; an active land management program to utilize subsurface drainage on salt-tolerant crops; and a no-tailwater policy to reduce overall volume of drainage needing control and also to prevent silt from being discharged into the Drain.

Phase I of the GBP was covered by a 1998 WDR and Phase II was covered by a 2001 WDR update. In 2010, an updated Use Agreement between the U.S Bureau of Reclamation and the San Luis & Delta-Mendota Water Authority specified terms and conditions that address continued use of the San Luis Drain, GBP longevity and water quality.

A Draft Order implementing the WDRs for Phase III of the GBP was circulated by the Central Valley Water Board in May 2014 with comments due by 30 June 2014. The Draft Order continues to support the requirements for the selenium control program, but also incorporates new requirements under the Irrigated Lands Regulatory Program (ILRP).

In regards to salinity, the Draft Order references salt load requirements specified in the Control Program for Salt and Boron Discharges into the Lower San Joaquin River contained in the Water Quality Control Plan for the Sacramento-San Joaquin River Basins (Salinity Control Program). The Salinity Control Program requires that dischargers meet monthly salt load allocations specified in the Basin Plan or participate in a Central Valley Water Board approved Real Time Management Program (RTMP). The RTMP is currently scheduled for Regional Board consideration in October 2014.

A workshop to discuss the draft Order is schedule at the Central Valley Water Board meeting on Friday 8 August 2014, with the tentative order anticipated for public release in mid-September 2014.

Since the draft Order contains requirements for salinity control, Central Valley Water Board staff requests review by CV-SALTS to provide consistency with the initiative's overall goals and objectives. Please note that the salinity related requirements for the draft GBP WDR are the same requirements as listed in the recently adopted WDR for the Westside Coalition. The GBP draft Order and the comments received can be accessed at:

http://www.waterboards.ca.gov/centralvalley/board_decisions/tentative_orders/1408/index.shtml#19

The following highlights the key salinity requirement.

Pg.15, V.E. Total Maximum Daily Load (TMDL) Requirements
"Approved TMDLs in the Basin Plan that apply to surface water bodies downstream of the San Luis Drain discharge and have allocations for irrigated agriculture shall be implemented in accordance with the applicable Basin Plan provisions. Where applicable, SQMPs shall be developed or the Drainage Management Plan shall be updated to address TMDL requirements.

TMDL requirements include, but are not limited to, Basin Plan provisions for the Control Program Salt and Boron Discharges into the Lower San Joaquin River. To meet the requirements of the Control Program for Salt and Boron Discharges into the Lower San Joaquin River, the Discharger must, by 30 June 2014, 1) participate in a Central Valley Water Board approved real-time management program; or 2) submit a surface water quality management plan that includes the required elements identified in the Monitoring and Reporting Program, Appendix MRP-1 and is designed to meet the Base Salt Load Allocations identified in Table IV-4.4 *Summary of Allocations and Credits* within the applicable compliance schedule for compliance in Table IV-4.3."

The Board also received comments that salt load limits included in the San Luis Drain Use Agreement between the Bureau of Reclamation and the San Luis & Delta-Mendota Water Authority should be included in the draft Order. Appendix E, pages 34 and 35 of the Use Agreement include the applicable salt load values:

http://www.waterboards.ca.gov/centralvalley/water_issues/grassland_bypass/gbp_2010_2019_use_agree.pdf

Questions

1. Is the incorporation of the Salt/Boron Control Program, as referenced in the draft Order, consistent with CV-SALTS goals and objectives?

2. Should the salinity load values contained in the Use Agreement be incorporated into the draft Order?

3. The draft Order requires compliance with water quality objectives (including MCLs, where applicable) in the receiving waters and includes nitrate monitoring. Are any further provisions related to nitrate needed in the draft Order to be consistent with CV-SALTS goals and objectives?

4. Are there any specific recommended changes to the draft Order that are needed to provide consistency with CV-SALTS goals and objectives?

5. Is there a need to schedule a conference call for interested CV-SALTS members during the week of August 18th for a more thorough discussion of the salinity and nitrate components of the draft Order?

If changes are proposed, please provide suggested language and rationale for the changes.