

SECONDARY MCLs ALTERNATIVES

	Basin Plan Element	No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter III Water Quality Objectives	1. Prospective language	Includes Prospective Language	Same as No Action Alternative	<u>Alternative:</u> Remove prospective language.	May be revisited during a Triennial Review.
	2. Natural background	Considers natural background for all constituents not covered by SIP (CTR constituents under NPDES and storm water)	Consider cases where natural background concentrations of a particular chemical constituent exceeds the SMCLs specified in Table 64449-A and B. In such cases, water body shall not exceed natural background.	<u>Alternative:</u> Consider natural background for constituents <u>only</u> in Table 64449-B.	Consideration of natural background is a basin plan requirement when setting permit limits for all WQOs, not just those protective of MUN
	3. Salinity vs non-salinity constituents	References both Table 64449-A and B constituents in basin plans.	Same as No Action Alternative	<u>Alternative:</u> Only reference salinity related SMCLs (Table 64449-B) since the SNMP addresses salt and nitrate only.	
	4. Referenced Title 22 language	No language provided	<ul style="list-style-type: none"> <li>• Include a reference to the full section of Title 22’s Section 64449 and not just the tables.</li> <li>• Table 64449-A: Constituents shall not exceed MCL</li> <li>• Table 64449-B: Constituents shall not exceed “Upper” (1600 EC) level unless otherwise authorized by the Board.</li> <li>• Constituents levels ranging up to “Upper” level are acceptable if it is neither reasonable/feasible to provide more suitable water.</li> <li>• Constituents levels ranging up to “Short Term” (2200 EC) level may be authorized on a temporary basis consistent with 64449(d)(3).</li> </ul>	<u>Alternative:</u> <ul style="list-style-type: none"> <li>• Remove Table 64449-A language.</li> <li>• Table 64449-B: Constituents ranging up to “Recommended” (900 EC) level is acceptable whereas an “Upper” (1600 EC) level is acceptable during extended dry periods.</li> <li>• “Short Term” may be authorized on a temporary basis pending construction of treatment facilities or development of acceptable new water sources.</li> <li>• Any recycling or conservation should continue to protect the “Recommended” level.</li> </ul> <u>Modification to SNMP Recommendation:</u> “Short Term” level may be authorized on a temporary basis consistent with 64449(d)(d3) and/or consistent with the Drought and Conservation Policy.	

	Basin Plan Element	No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter III Water Quality Objectives	5. Limits to protect beneficial use	No language provided	No language provided	<p>Alternative: Regional Board acknowledges that specific treatment requirements are imposed by state and federal drinking water regulations.</p> <p>To protect all beneficial uses, Board may apply limits more stringent than MCLs.</p> <p>Provisions do not supersede or modify requirements of CTR and SIP.</p>	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	1. Sample type for compliance	No language provided	<p>(a) Compliance with the chemical constituent water quality objective shall be determined from a filtered water sample for the following constituents identified in 22 CCR 64449 (Table A): Aluminum, Color, Copper, Iron, Manganese, Silver, Turbidity and Zinc.</p> <p>(b) Compliance with the chemical constituent water quality objective shall be determined from and unfiltered water sample for the following constituents identified in 22 CCR 64449 (Table A): Foaming Agents (MBAs), Methyl-tert-Butyl Ether (MTBE), Odor-Threshold and Thiobencarb.</p> <p>For receiving waters exempt from filtration requirements, unfiltered water samples used for Table 64449-A and B.</p>	<p><u>Modification to SNMP Recommendation:</u></p> <p>For receiving waters that have been deemed exempt from surface water filtration requirements, compliance with chemical constituents in Table 64449-A shall be determined using an unfiltered water sample.</p> <p>For receiving water that are not exempt from surface water filtration requirements, compliance with chemical constituents in Table 64449-A shall be based on the techniques in (a) and (b) below.</p> <p>(a) Compliance with the chemical constituent water quality objective <u>may be determined using tests other than for “total”, such as methods using variations of filtered samples, where such methods have been analyzed for their appropriateness,</u> for the following constituents identified in Title 22, section 64449 (Table A): Aluminum, Color, Copper, Iron, Manganese, Silver, Turbidity and Zinc.</p> <p>(b) No change</p>	
				<p><u>Modification to (a) above:</u> Compliance with the chemical constituent water quality objective may be determined using tests other than for “total”, such as methods using variations of filtered samples, where such methods have been analyzed for their appropriateness <u>in representing the quality of treated drinking water...”</u></p>	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation				<p><u>Modification to (a) above:</u> Use 1 micron filtration for all filtered water samples.</p> <p><u>Alternative:</u> Use total (unfiltered) samples for all analyses. Clarification should be provided in Basin Plan and guidance.</p> <p><u>Alternative:</u> Use filtered samples instead of unfiltered samples for MBAs and Odor</p>	
	2. Compliance period	No language provided	Compliance with any chemical constituent in Tables 64449-A or 64449-B shall be determined from the annual average of sample results	<u>Alternative:</u> Remove compliance period from Implementation Chapter and put in the WQO Chapter of Basin Plan. Use a long-term averaging period for groundwater and an annual average for surface water.	
	3. Table 64449-B "Recommended" value	No language provided	Lower concentrations such as "Recommended" values in Table 64449-B are not water quality objectives per se, but should be considered for management goals.		
	4. Consideration of site-specific factors for WDRs:  Assimilative capacity	No language provided	"The availability of assimilative capacity in the receiving water and compliance with the antidegradation policies"		
	5. Consideration of site-specific factors for WDRs:  Natural background	Permit limits not to be more stringent than natural background for all objectives except permits required to meet CTRs under SIP (NPDES permits)	"Naturally occurring background concentrations"		Unclear if and how SIP for NPDES discharges may apply

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
	6. Consideration of site-specific factors for WDRs:  Anthropogenic background	No language provided	“Background concentrations due to prior anthropogenic activities where it is not feasible or practicable to remediate the effect of these past dischargers”		
	7. Consideration of site-specific factors for WDRs:  Net effect	No language provided	“The net effect of discharges that improve receiving water quality”	<u>Modification to SNMP Recommendation:</u> “The net effect of discharges that <u>affect</u> receiving water quality”	
Chapter IV Implementation	8. Consideration of site-specific factors for WDRs:  Presence/absence of minerals	No language provided	“The presence or absence of other minerals (e.g, anion-cation balance) that may mitigate or aggravate aesthetic acceptability”	<u>Alternative:</u> Do not include presence/absence of minerals language.	
	9. Consideration of site-specific factors for WDRs:  Application of long-term averaging periods	No language provided	“The application of appropriate long-term averaging periods to evaluate compliance with WDR monitoring requirements”	<u>Alternative:</u> Only include annual running average instead of long-term averaging periods.  <u>Alternative:</u> Remove SNMP recommended language from the Basin Plan Language and discuss in staff report –may be reviewed further during the P&O study as an option for groundwater compliance	
	10. Consideration of site-specific factors for WDRs:  Potential impact on downstream beneficial uses	No language provided	“Potential impact on downstream beneficial uses (MUN-designated surface water and groundwater), including potential to impact water quality at <u>nearest</u> downstream intakes for a community water system.”	<u>Alternative:</u> “Potential impact on downstream <u>water quality and</u> beneficial uses (MUN-designated surface water and groundwater) for <u>current and future use.</u> ”  <u>Modification to SNMP recommendation:</u> “Potential impact on downstream beneficial uses (MUN-designated surface water and groundwater), including potential to impact water quality at <del>nearest</del> downstream intakes for a community water system.”	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	11. Consideration of site-specific factors for WDRs:  Waiver under 22CCR §64449.2 and provisions of §64449.4	No language provided	“Evaluation of downstream or down-gradient community water system(s) to determine if waiver under 22 CCR §64449.2 has been obtained or if the provisions of §64449.4 are being met.”	<p><u>Alternative:</u> Do not include this language</p> <p><b><u>Alternative:</u></b> Remove SNMP recommended language from Basin Plan Language and include as guidance in staff report.</p> <p><u>Alternative:</u> Include a consultation with DDW and Potentially Impacted Community Water Systems with this recommendation</p>	
	12. Consideration of site-specific factors for WDRs:  Economic factors	No language provided	“Economic factors including the practicality and feasibility of achieving compliance with the SMCLs at the point-of-discharge (including consideration of cost for achieving compliance, the availability of alternative water supplies for drinking water, ability to pay, and cost of non-compliance).”	<p><u>Modification to SNMP recommendation:</u> Remove “at the point-of-discharge” in SNMP recommendation.</p> <p><b><u>Modification to SNMP recommendation:</u></b> “The practicality and feasibility of achieving compliance with the SMCLs at the point-of-discharge (including consideration of <u>source control and pollution prevention programs, treatment alternatives</u>, the cost for achieving compliance, the availability of alternative water supplies for drinking water, ability to pay, and <u>other economic factors including the cost of non-compliance</u>).”</p> <p><u>Modification to SNMP recommendation:</u> “The practicality and feasibility of achieving compliance with the SMCLs at the point-of-discharge, <u>as well as the potential benefits to water quality to be obtained.</u>”</p> <p><u>Alternative:</u> Include a consultation with DDW and Potentially Impacted Community Water Systems with this recommendation</p>	
	13. Consideration of site-specific factors for WDRs:  Water treatment process and cost to others	No language provided	“The ability of drinking water treatment processes to remove contaminants and the potential effect on drinking water treatment costs for downstream and down-gradient community water systems.”	<p><b><u>Alternative:</u></b> Remove SNMP recommendation language and include as guidance in staff report</p> <p><u>Alternative:</u> Include a consultation with DDW and Potentially Impacted Community Water Systems with this recommendation</p>	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	14. Consideration of site-specific factors for WDRs:  Waiver under 22CCR §64449.2 and provisions of §64449.4	No language provided	“Consideration of other regional salinity management requirements, including the ability to meet existing downstream salinity-related water quality objectives in the SRSJR and TLB Basin Plans and Bay Delta Plan and policies, recommendations or regulations resulting from implementation of CV-SALTS Salinity Management Strategy”	Alternative: Remove SNMP recommendation language and include as guidance in staff report	
	15. Consideration of site-specific factors for WDRs:  Potential effect on constituents	No language provided	“Potential for the permitted discharge to affect the concentration of constituents identified in 22 CCR Tables 64449-A and B at downstream and downgradient community water systems to ensure a safe drinking water supply for users.”	<u>Modification to SNMP Recommendation:</u> “Potential for the permitted discharge to affect the concentration of constituents identified in 22 CCR Tables <del>64449-A</del> 64449-B downstream and downgradient MUN water bodies and groundwater basins to ensure a safe drinking water supply for current and future MUN users.”  <u>Modification to SNMP Recommendation:</u> “Potential for the permitted discharge to affect the concentration of constituents identified in <del>22 CCR</del> Tables 64449-A and 64449-B at downstream and downgradient community water systems to ensure a safe drinking water supply for users.”  <u>Modification to SNMP Recommendation:</u> “Potential for the permitted discharge to affect the concentration of constituents identified in <del>22 CCR</del> Tables 64449-A and 64449-B at downstream and downgradient <u>MUN designated water bodies</u> to ensure a safe drinking water supply for users.”  Alternative: Remove this SNMP language from the Basin Plan language and include as guidance in staff report	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	16. Consideration of site-specific factors for WDRs:  Additional monitoring	No language provided	“Need for additional monitoring to track the net effect of permitted discharges at locations upgradient of downgradient well locations where groundwater is extracted for water supply and to determine the need for additional management requirements to protect the supply.”	<p><u>Modification to SNMP Recommendation:</u> “Need for additional monitoring to track the net effect of permitted discharges <u>on downstream or downgradient MUN water bodies</u> and to determine the need for additional management requirements to protect the MUN supply.”</p> <p><u>Alternative:</u> Remove this SNMP language from the Basin Plan language and include as guidance in staff report</p>	
	17. Consideration of site-specific factors for WDRs:  Drought and conservation	No language provided	“The State Water Board’s Recycled Water Policy and the Central Valley SNMP’s goals to increase the use of recycled water, increase stormwater use, and increase water conservation as mechanisms to increase drought protection.”		
	18. Consideration of site-specific factors for WDRs:  Cumulative impact	No language provided	“The long-term cumulative impact of all discharges to the same receiving water”	<p><u>Alternative:</u> Remove this SNMP language from the Basin Plan language and include as guidance in staff report</p>	
	19. Consideration of site-specific factors for WDRs:  Dilution and soil absorption	No language provided	“Modeling and any reduction in contaminants due to factors such as dilution and soil absorption.”	<p><u>Modification to SNMP Recommendation</u> “Modeling and any <u>changes</u> in contaminant concentrations due to fate and transport factors.”</p> <p><u>Modification to SNMP Recommendation</u> “Modeling and any <u>changes</u> in contaminant <u>due to fate and transport factors</u> such as dilution and soil adsorption.”</p> <p><u>Alternative:</u> Compliance with MCLs must be achieved at the point of discharge (no mixing zone or dilution credits)</p> <p><u>Alternative:</u> Remove this SNMP language from the Basin Plan language and include as guidance in staff report</p>	



Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	20. Consideration of site-specific factors for WDRs:  Other environmental considerations	No language provided	"Other environmental considerations"	<p><u>Alternative:</u> Remove other environmental considerations language.</p> <p><u>Modification to SNMP recommendation:</u> "Other environmental considerations <u>including, but not limited to: habitat preservation, support for recreational uses.</u>"</p> <p><u>Alternative:</u> Remove this SNMP language from the Basin Plan language and include as guidance in staff report</p>	
	21. Consideration of site-specific factors for WDRs:  Waiver under 22CCR §64449.2 and provisions of §64449.4	No language provided	No language provided	<p><u>Additional bullet for the Implementation Section:</u> "The existing processes to reduce, to the maximum extent practicable, the discharge of the pollutant through pretreatment, source control, and/or pollution prevention"</p> <p>"List of possible methods for removing or reducing the concentrations and loadings of the pollutants from the discharge, including an assessment of technical effectiveness and costs of these methods."</p>	This discussion occurs in the staff report. No need to formalize these bullets in Basin Plan Language

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter IV Implementation	22. Consideration of site-specific factors for WDRs:  DDW consultation	No language provided	No language provided	<p><u>Additional bullet for the Implementation Section:</u>            “Consultation with the Division of Drinking Water to assess impacts to downstream or downgradient community water systems, including:</p> <ul style="list-style-type: none"> <li>○ Economic factors including the practicality and feasibility of achieving compliance with the salinity SMCLs (including consideration of cost for achieving compliance, the availability of alternate water supplies for drinking water, ability to pay, and cost of non-compliance)</li> <li>○ The ability of drinking water treatment processes to remove contaminants and the potential effect of drinking water treatment costs for downstream and downgradient community water systems.</li> <li>○ Drinking water regulatory and human health information from USEPA, the Division of Drinking Water, and OEHHA.”</li> </ul>	
	23. Consideration of site-specific factors for WDRs:  Human health information or regulatory threshold	No existing language	No language provided	<p><u>Additional bullet for the Implementation Section:</u>            “The potential for an SMCL to have existing, new or pending human health information or regulatory threshold.” Include consultation with DDW and potentially impacted Community Water System</p>	

Basin Plan Components		No Action Alternative	SNMP Recommendations	Alternative/Modified Recommendations	Notes
Chapter V or VI Monitoring and Surveillance	24. Monitoring and Surveillance	No language provided	No language provided	<p><u>Alternative as an Addition to Monitoring and Surveillance Chapter:</u></p> <p>“Monitoring and assessment programs are essential to evaluate the existing conditions and changes in both surface and groundwater quality caused by dischargers. Where it is reasonable and feasible to do so, WDRs should consider development of a monitoring program and/or assessment of existing programs. Considering limited resources in certain areas of the Basin, a monitoring program is not a strict requirement by this water quality control program, but it is desirable and should be implemented as available resources allow.”</p>	The monitoring and surveillance program is a separate component of the proposed Basin Plan Amendments. See discussion in Staff Report.
				<p><u>Alternative as an Addition to Monitoring and Surveillance Chapter:</u></p> <p>A monitoring program for surface waters shall be required to characterize natural background and existing conditions with respect to secondary MCLs where available data is deemed to be insufficient.</p>	
				<p><u>Alternative as an Addition to Monitoring and Surveillance Chapter:</u></p> <p>If concentrations within a water body or groundwater basin reach 80 percent of the secondary MCL at the point of a water supply intake or well, a study will be conducted to evaluate actions to reduce the concentration of the constituent.</p>	