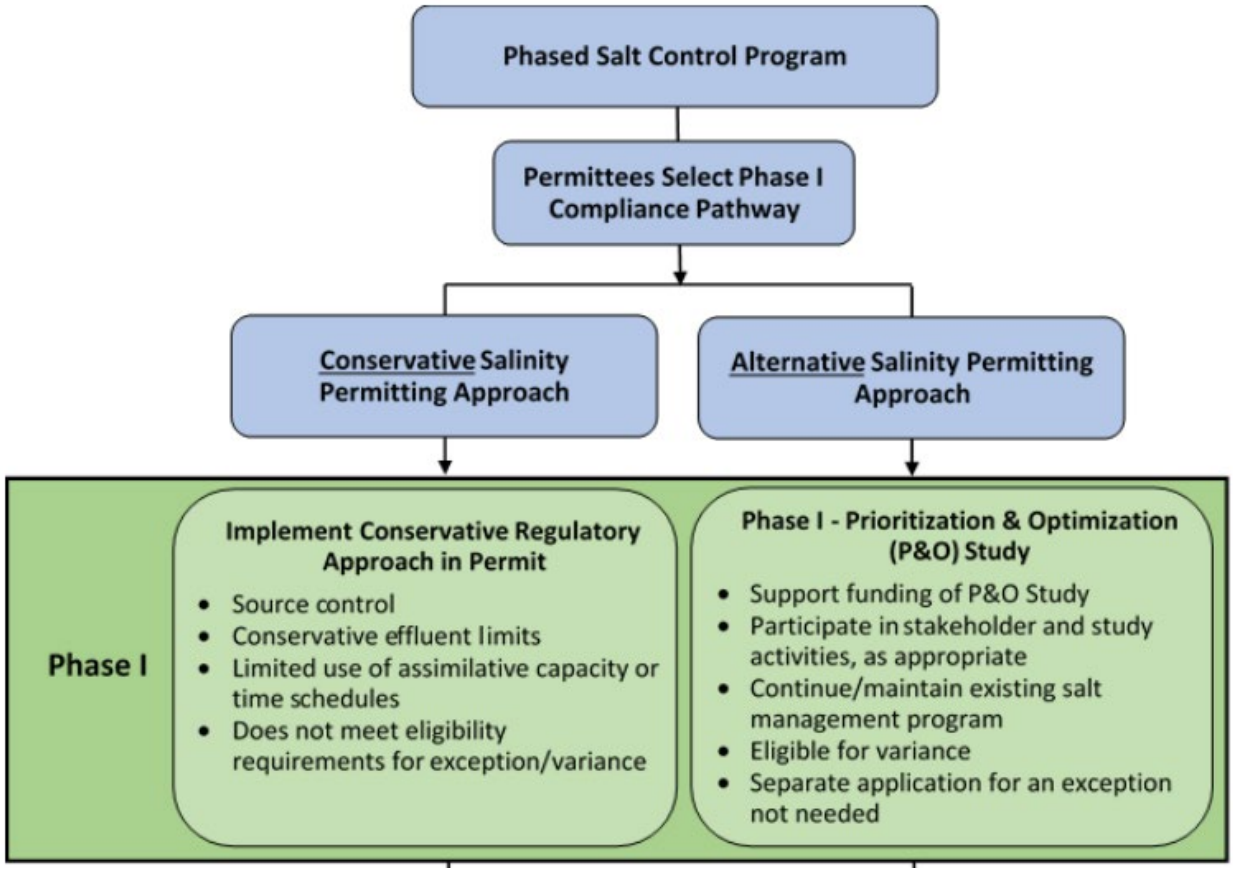
Implementation of Salt Control Program – Phase I
Existing NPDES Permitees



Projected Timeline

Activity	2018	2019				2020			
	4th Qtr	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
BPA Effective		★							
Notice to Comply Issued	Within 1-yr of BPA effective date →								
						Conditional Prohibition in effect →			

Conditional Prohibition to implement Phase 1
A Conditional Prohibition will apply to all permittees discharging salt from the time the permittee receives a Notice to Comply until such time that the permittees' existing waste discharge requirements are updated or amended to reflect requirements of the Salt Control Program.

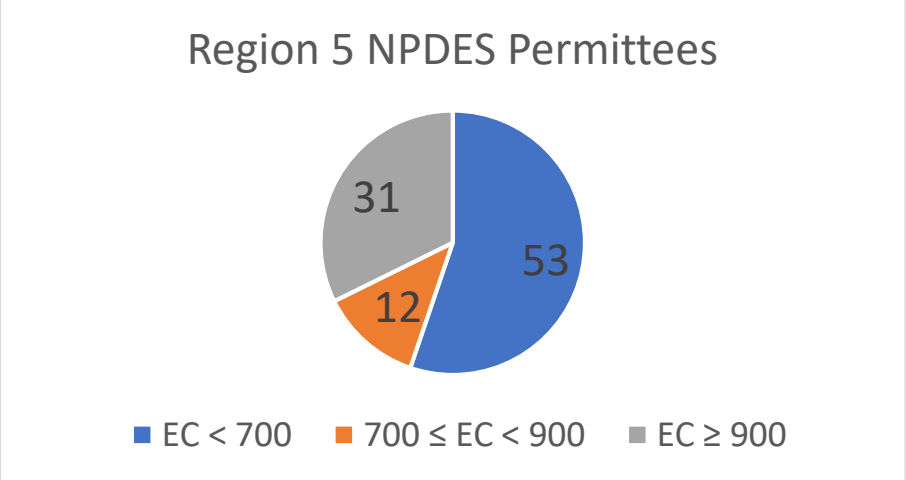
Notices to Comply must be issued within 1-year of the effective date of the Basin Plan amendment. Currently staff are projecting that Notices to Comply will be issued starting in January 2020. No later than 6 months from receiving the Notice to Comply, existing permitees shall notify the Central Valley Water Board of its decision to be permitted under the Conservative or Alternative permitting approach.

Do NPDES Permits Need to be Amended to Implement Salt Control Program?
In most situations we do not expect the need to amend existing NPDES permits. The Conditional Prohibition is sufficient to implement Phase 1 of the Salt Control Program until permit renewals. As permits come up for renewal after receiving the requested compliance pathway from permittees, the renewed NPDES permits will implement the Salt Control Program and the Conditional Prohibition will no longer be applicable.

Any Changes to Salinity Permit Requirements for Renewals Until BPA Effective?
We do not expect changes to the NPDES permit requirements to control salinity. NPDES permits that come up for renewal prior to permittees submitting their selected compliance pathway will continue to include salinity controls such as performance-based limits or triggers and requirements to implement salinity evaluation and minimization plans.

What are Expected Salinity Permitting Approaches for Existing Region 5 NPDES Permittees?

Figure 1. Monthly Average Effluent Electrical Conductivity for Exiting Region 5 NPDES Permittees (µmhos/cm)



NPDES Permittees with EC < 700 µmhos/cm	NPDES Permittees with EC ≥ 700 µmhos/cm
• Recommend Alternative Salinity Permitting Approach for most permittees • May qualify for Conservative Salinity Permitting Approach ○ Must demonstrate compliance with conservative permit limits ○ If degradation caused by the discharge, must demonstrate degradation of high quality water better serves the people of the state rather than their participation in the P&O study for Phase I of the Salt Control Program ○ Requires concurrence by Central Valley Water Board staff ○ Limited use of assimilative capacity ○ Not eligible for salinity variance ○ NPDES permits to include salinity source control requirements and limits/triggers ○ Must participate in Salt and Nitrate Surveillance and Monitoring Program	• Alternative Salinity Permitting Approach likely best option ○ Fund and participate in the Salinity Prioritization and Optimization Study (P&O study) ○ Continue/maintain existing salt management program ○ NPDES permits to continue performance-based effluent limits or triggers to maintain discharge concentrations ○ Assess granting assimilative capacity (mixing zone and dilution credits) ○ Assess eligibility for compliance schedule or variance ○ Must participate in Salt and Nitrate Surveillance and Monitoring Program