

Evaluation of MUN Use Archetypes for POTW Receiving Waters

Minutes from November 16, 2011 1-4pm Meeting

Attendees:

Debbie Webster – Central Valley Clean Water Association
Thomas Grovhoug – Larry Walker and Associates
Theresa Dunham – Somach Simmons & Dunn
Roberta Tassef – United States Bureau of Reclamation
Jeanne Chilcott, Anne Littlejohn, Calvin Yang – CV Regional Water Quality Control Board

Meeting Objectives:

- Understand unique characteristics of four archetype candidates: Colusa; Live Oak, Willows; and Biggs
- Identify pros/cons of pursuing each archetype (e.g. time constraints; work already completed and still needed; ability to apply findings on broader scale; etc.)
- Develop initial strawman scope/workplan for MUN evaluation of receiving waters
- Draft a recommendation to the Executive Committee on which archetypes to evaluate and the scope of CVSalts activities.

Meeting Summary

- Identified policy issues to discuss with regulatory agencies (USEPA, State Board, Regional Board and later with the Corp of Engineers)
- Discussed the POTW archetypes in detail and scope (sub-basin) for each
 - Initial consensus was to set Biggs to the side until we could confirm their interest in collaborating since they are currently pursuing land discharge; there is an advantage to doing all of the remaining three due to their unique drainage patterns so we should aggressively pursue leveraging opportunities
 - If we cannot do all three, we developed criteria to rank the archetypes
 - Drafted tasks and did a preliminary ID of collaboration potential and tasks that could be completed with staff vs. those needing contract dollars
 - Brief review of Regional Board contract laboratory costs and options for potential scans
- Next steps:
 - Fine tune tasks for strawman scope and work plan
 - Consolidate monitoring information and ID gaps and potential partners
 - Start initial monitoring plan and QAPP
 - Next meeting review tasks and workplan w/focus on collaboration potential
 - Expand group to include Sac Valley Coalition (spoke to Bruce yesterday and he's willing); Rice Commission (either Tim or a rep); Dischargers
 - Set meeting with Regulatory reps

The group also discussed the bigger picture (Jeanne Chilcott's new task is to identify appropriate beneficial uses for ALL Ag dominated water bodies) and concurred that the best way to move forward was to start with these specific archetypes for MUN and slowly expand the group as we look at the broader issue and other beneficial uses. We will look for opportunities to do needed evaluations for the other beneficial uses as we move forward with these archetypes for time and cost effectiveness.

Background and pros/cons of four potential archetypes:

Maps and fact sheets were reviewed for Colusa, Live Oak, Willows and Biggs Wastewater Treatment Plants. Highlights include:

- Colusa WWTP –
 - Most recent permit: December 2008
 - BPA Decision Date: December 2014
 - Compliance Date: December 2018.

Effluent discharges to an Unnamed tributary built for irrigation and stormwater drainage. This tributary flows to Powell Slough and then into the Non-MUN designated Colusa Basin Drain (ISWP Category C1).

- Pros – The most work on the BPA process has been done to date, relatively short distance to the Colusa Basin Drain via Powell Slough
- Cons – No characterization of Powell Slough or the Unnamed Tributary found in the ISWP (still needs further research). Unsure of how the flow into a natural water body (Powell Slough) may complicate the de-designation process. However, this may in fact be a Pro because it could be more reflective of some of the San Joaquin River Basin scenarios.

- Willows WWTP
 - Most recent permit: October 2011
 - Basin Plan Amendment Decision: October 2015
 - Compliance Date: October 2016

Effluent discharges to either Agricultural Drain C (ISWP Category C1) or the Glenn-Colusa Irrigation Drainage Canal 26-2 (ISWP Category C2) and flows to Logan Creek (ISWP Category B1 through nearby wildlife refuge and C3 for 2.5 mile stretch to Colusa Basin Drain).

- Pros – The water bodies have been identified in ISWP, includes the aspect of groundwater recharge in the area, economies of scale by combining this candidate with Colusa
- Cons – There is a longer pathway to the discharge point at the Colusa Basin Drain, it is much further up the watershed, there are potentially more complications with Logan Creek flowing through at nature preserve

- City of Live Oak WWTP
 - Most recent permit: June 2011
 - Compliance Date: June 2016.

Effluent discharges to District 777 Lateral Drain No. 1 (ISWP Category C1) and flows directly to East Interceptor Canal and Wadsworth Canal (both ISWP Category C1) before reaching the Non-MUN designated Sutter Bypass (ISWP Category C3).

- Pros – The water body types are all the same (C1) for the flow into the Sutter Bypass (no natural water bodies), POTW is a willing participant
- Cons – Its relatively straightforward flow pattern may make de-designation simpler, this model may not be as reflective of the majority of other scenarios, especially in the SJR basin.

- City of Biggs WWTP – Most recent permit: May 2007. Compliance Date – none. Effluent discharges to a constructed agricultural drain, Lateral K and flows through a series of canals before reaching the Non-MUN designated Butte Creek (ISWP Category B1) and the Non-MUN designated Sutter Bypass (ISWP Category C3). The discharger has not followed through with the 2007 permit requirement for a beneficial use designation study and has not submitted any decision to pursue the BPA process. Conversations with CV Water Board staff indicate that they may be pursuing a land-discharge permit in the future.
 - Pros – ?
 - Cons – least information available of the hydrologic pattern, interest of the POTW is questionable since they are considering land-discharge

General Information Needs:

- Hydrologic Pattern, Field Surveys
- Confirmation of waterbody types moving downstream
- Flow measurements
- Water quality information
- Water of the Nation determination

Criteria for Candidate selection

After reviewing all four candidates, the overall consensus of the planning group was a preference to pursue three out of the four candidates (Colusa, Live Oak and Willows). The City of Biggs was given the lowest priority, but they will be contacted to gauge their interest in the BPA process before being removed from consideration.

If resources and time are prohibitive to address all three, the candidate selection criteria are:

- Work accomplished to date (ease of completion)
 - History (basin, water body)
 - Hydrology, flow characterization
 - Water quality information (effluent and receiving water)
 - Water rights
 - Field surveys (e.g. intakes)
- Ability to apply findings on a broader scale (e.g. San Joaquin River Basin Ag. Drains)
 - Complexity of drainage pattern (e.g. flow through wildlife refuge)
 - Support ag concerns in addition to POTW issues
 - Ephemeral receiving water bodies
- Willingness of POTW to partner
- Ability to leverage other resources
- Permit timing – Compliance date
- Economy of scale

Strawman Scope/Major Tasks

- Planning
 - Coordination with SWRCB/USEPA and later COE
 - Strategic Compliance
 - Identify what it takes to be in compliance (POTW and ILRP)

- Evaluate type of Basin Plan action or other alternative (UAA/SSO)
 - Where would be the decision point for pursuing “incidental use” and/or site specific objectives
- Lessons learned from Vacaville – incidental or seasonal use?
- Consider 10-g factors as developing effort and gathering data
- Identify contributors/task leads
 - Funding/leveraging of resources
- Water of the US determination (top priority for CV Salts)
- Identify Constituents of Concern
- Data compilation/assessment (e.g. history, hydrology, field surveys)
- Additional water quality/flow monitoring assessment
 - Table of Lab Analysis Costs provided for constituents of concern identified to date
- Use assessment (MUN for this specific effort)
- UAA or scientific analysis
- CEQA scoping
- Economic Analysis
- Staff Report/CEQA equivalent
- Peer Review
- Circulate staff report

Next Steps

- Send out meeting notes (Reg. Bd staff)
- Updated strawman scope via email (all)
- Develop evaluation work sheet (initial draft Reg. Bd staff)
- Complete evaluation using identified criteria (all)
- Consolidate monitoring and ID gaps (initial work Reg Bd. Staff)
- Draft monitoring plan and QAPP (initial draft Reg. Bd. Staff)
- Focus next subgroup meeting on confirming workplan and collaboration
- Schedule Meetings
 - Internal Staff Meeting: staff from ILRP, SWAMP, and NPDES (permit writers) to discuss current monitoring, flexibility of permits (can requirements be changed, can regional monitoring replace existing monitoring?), and leveraging resources. Tentative date: mid December 2011
 - Regulatory Meeting with staff from State Board, EPA to discuss regulatory issues relating to BPA process. Tentative date: January 2012
 - Regulatory and Stakeholder Joint Meeting: POTWs, ILRP Coalitions (Sac Valley/Rice Commission) and NPDES (permit writers) to gauge interest and participation, discuss leveraging opportunities. Tentative date: ?