



CV-SALTS Salt Control Program – Webinar Questions & Answers

Table of Contents

SUMMARY	1
Geography.....	1
Program Exemptions.....	1
Pathway Selection.....	1
For More Information	1
PROGRAM EXEMPTIONS	2
General.....	2
Location.....	3
Low Salinity	3
No Discharge	3
Ponds.....	4
Discharge to Sewer or Wastewater Treatment Plant	4
PROGRAM DETAILS	5
Notice to Comply	5
Salt Sources	5
Permit Changes	6
Other Regulatory Programs	6
Responsibility	6
PERMIT PATHWAYS	7
CHOOSING A PATHWAY	7
Coalitions	7
Applicability	7
Current Requirements	8
Switching Pathways	8
ALTERNATIVE PATHWAY	9
Irrigated Lands Coalitions	9
Current Requirements	9
Participation.....	10
CONSERVATIVE PATHWAY	11
Antidegradation.....	11
Assessment	11
Board Review	12
Documentation	12
EC Criteria	13
Monitoring	14
Permit Process	14

Webinar Questions and Answers

FEES, PAYMENT PROCESSES & FILING15
Fees 15
Fees Category..... 16
Fees for Coalition Members..... 16
Fees Frequency 17
Future Fees..... 17
Paperwork..... 17
Payment Process..... 18
P&O STUDY.....19
PROGRAM SUGGESTIONS.....20
INFORMATION REQUESTS21

The following responses do not address site-specific permit requirements. For site-specific questions about your permit requirements, email cvsalts@waterboards.ca.gov.

SUMMARY

Geography

What is the area of coverage for the Salt Control Program? Is this the Valley itself or the watersheds covered by the CV region?

The jurisdiction of the Central Valley Water Board and the Salt Control Program encompasses three hydrologic regions (watersheds): the Sacramento River, the San Joaquin River, and the Tulare Lake Basin. The Sacramento Valley River hydrologic region includes the foothills, Sierra and Plumas Counties, the Pit River, Pope Valley (Napa) and Lake County.

Program Exemptions

Are there exemptions from the Salt Control Program?

No. If you received a Notice to Comply (NTC), you must participate in the program. The Salt Control Program does not include any exemption provisions for those that receive an NTC. Although not an exemption, the Conservative Permitting Approach provides an option for certain dischargers who provide the necessary documentation to show that they are not degrading groundwater quality. The Alternative Permitting Approach most likely will provide a more cost-effective means of compliance through Phase 1, even to those that can meet the requirements of the Conservative Approach. Please note, however, that subsequent to release of the Notice to Comply, the State Water Board adopted a Winery General Order that exempted out very small facilities. Depending on the applicability of the State Water Board's Winery General Order, your facility may be excluded from the Salt Control Program if you are not subject to the newly adopted Winery General Order.

Pathway Selection

When do I need to comply?

If you received a Notice to Comply for the Salt Control Program, you must select a permitting pathway and file your Notice of Intent (NOI) with the Central Valley Water Board by July 15, 2021. There are two permitting options, the Alternative Permitting Approach and the Conservative Permitting Approach. In most cases, the Alternative Permitting Approach will be the most cost-effective compliance option.

For More Information

Where can I get more information?

Additional information is available at www.cvsalts.info. The webinar presentation and recording are posted there, as well as program information and registration page for the Alternative Permitting Approach. The Central Valley Water Board compliance guidelines are available [here](#).

The payment portal is available at <https://www.cvsalinity.org/po-fee-form>. You will need your CV-SALTS ID # from your NTC to get started.

Webinar Questions and Answers

Questions

Answers

PROGRAM EXEMPTIONS

General

<p>It seems like the Notice to Comply for our Aquifer Storage and Recovery program is a mistake. We inject treated surface water (EC around 170) into our groundwater zone (EC around 900) for recovery at a later date, so we're improving the groundwater conditions for salt. How should we proceed?</p>	<p><i>Almost all activities contribute or threaten to contribute to the salinity problem. If you received an NTC, you must participate in the program. Your situation may be appropriate for the Conservative Pathway.</i></p>
<p>What if the facility is a small winery located on farmland that is already part of a participatory coalition (nitrate/drinking water compliance) fee program, is this facility exempt or does this facility have to participate and pay additional fees for this program?</p>	<p><i>Unless you are a member of the Irrigated Lands Regulatory Program (except for the Tule Basin and Sacramento Valley coalitions), Dairy Representative Monitoring Program, or the Poultry Order, you must participate and pay fees for the Salt Control Program. The nitrate control program is a separate process. However, the State Water Board recently adopted a new Winery General Order. Depending on the size of the winery, if you are under the threshold for application of the Winery General Order, you may no longer be subject to the Salt Control Program.</i></p>
<p>What are the qualifications for exemption? We are a tiny winery outside Somerset not near any water bodies.</p>	<p><i>See response above for small wineries. Other than the small category of wineries that may no longer be subject to the Salt Control Program, if you received an NTC, you must participate in the program. The Salt Control Program does not include any exemption provisions for those that receive a Notice to Comply. Although not an exemption, the Conservative Permitting Approach provides an option for certain dischargers who provide the necessary documentation to show that they are not degrading groundwater quality. The Alternative Permitting approach most likely will provide a more cost-effective means of compliance through Phase 1, even to those that can meet the conservative approach.</i></p>
<p>Are there any exemptions? For instance, if our discharge isn't located in a defined groundwater basin? Or if the native soil and groundwater quality is already a salt sink and far lower quality than our discharge quality?</p>	<p><i>The water source for your facility does not determine your requirements. If you received an NTC, you must participate in the program. The Salt Control Program does not include any exemption provisions for those that receive a Notice to Comply. Although not an exemption, the Conservative Permitting Approach provides an option for certain discharges who provide the necessary documentation to show that they are not degrading groundwater quality. The Alternative Permitting approach most likely will provide a more cost-effective means of compliance through Phase 1, even to those that can meet the conservative approach.</i></p>
<p>We are not tied into municipal water source (we have wells).</p>	<p><i>The water source for your facility does not determine your requirements. If you received an NTC, you must participate in the program. The Salt Control Program does not include any exemption provisions for those that receive a Notice to Comply. Although not an exemption, the Conservative Permitting Approach provides an option for certain discharges who provide the necessary documentation to show that they are not degrading groundwater quality. The Alternative Permitting approach most likely will provide a more cost-effective means of compliance through Phase 1, even to those that can meet the conservative approach.</i></p>

Webinar Questions and Answers

Location

What if the facility is not located in any prioritized basin (low or medium/high)?

If you received an NTC, you are in a regulated area and must participate in the program. The Salt Control Program requirements apply to all permitted dischargers of salt within the Central Valley Water Board jurisdiction, which includes three hydrologic basins (Sacramento River, San Joaquin River, and Tulare Lake). You may be referring to priorities for groundwater basins under either the Nitrate Control Program (nitrate discharges) or the Sustainable Groundwater Management Act (groundwater sustainability).

Low Salinity

Our WWTP is a low flow 30,000 to 100,000 gpd located at a remote ski resort near Tahoe. We also have very low salinity levels. Should we be eligible for exemption?

We treat about 3000 GPD, we have very low salts, we are located at Lake McClure so should be exempt.

Almost all activities contribute or threaten to contribute to the salinity problem. If you received an NTC, you must participate in the program. However, you may qualify for the Conservative Permitting Approach.

No Discharge

Why would a compost facility with an engineered pad and berms to prevent salt migration to groundwater and surface water be subject to this regulation?

Almost all activities contribute or threaten to contribute to the salinity problem. If your composting facility received an NTC, you must follow the requirements of the program as specified in your NTC. Questions regarding your specific circumstances should be directed to the Central Valley Water Board at cvsalts@waterboards.ca.gov.

Sorry--follow-up (email got truncated). If zero discharge but facility retains WDR, would we be exempt from CVSALTS compliance? Or would the permit need to be cancelled?

WDRs are issued for discharges or for the potential to discharge. If you received an NTC, you must participate in the program. If there is no impact to groundwater or surface water, you may be able to justify compliance through the Conservative Pathway. Before terminating a WDR, you should confer directly with the Central Valley Water Board.

Webinar Questions and Answers

Ponds

I manage recreation areas with oxidation ponds. There is not any discharge any wastewater. All of our waste solids are removed from vaults and the liquid is pumped into ponds to evaporate off.

My facility does not discharge to land. We have 4 lined ponds. Do I still need to Participate?

Our wastewater ponds function through evaporation and the wastewater is removed by a contractor and treated off-site. We don't release any water into the natural environment. Are we exempt?

We use stabilization ponds. The ponds are sealed with buried membrane liner. The reporting requirements under current permits are to monitor freeboard and nuisance conditions. The ponds are for evaporation, no discharge onto any land surface or into channels or waterways. All discharge is contained within the ponds. There is no WWTF, and EC is not currently monitored nor was it monitored in the past. Not sure how compliance would be achieved with what the facility uses for wastewater management.

Almost all activities contribute or threaten to contribute to the salinity problem. If you received an NTC, you must participate in the program. If there is no impact to groundwater or surface water, you may be able to justify compliance with the conservative compliance option.

Discharge to Sewer or Wastewater Treatment Plant

Does this apply to a refrigerated warehouse that discharges back to the sewer? We do not discharge to a basin or any other bodies of water or land.

I consult for a small community that discharges to a larger community's WWTP. The larger community also has to comply. Is the smaller community exempt?

Our facility gets water from the city and discharge back to the sewer. Does this comply to us?

Does the NOI requirement apply to facilities that have permitted WW discharges to POTWs?

Does the NOI requirement apply to facilities that have permitted WW discharges to facilities that have permitted Industrial SW discharges?

What about composting facilities discharge is treated by WW Plant?

Almost all activities contribute or threaten to contribute to the salinity problem. If you received an NTC, you must participate in the program. Satellite collection systems would have to comply separately if they received a separate NTC. If the facility solely discharges to a sewer system, contact the Central Valley Water Board for a review of the NTC.

PROGRAM DETAILS

Notice to Comply

In oil and gas, are inactive/historic ponds planned for closure included in the NTC?	<i>All ponds listed in your permit are to be included if you are participating in the Alternative Pathway. If you are considering the Conservative Pathway contact your Central Valley Water Board Permit contact.</i>
As a WWTP that accepts flows from an Industrial Discharger, will the salt compliance also apply to the Industrial Discharger's permit or will the WWTP be responsible for all flows it accepts.	<i>The WWTP is responsible for the discharge that is permitted. The WWTP's authority to permit or limit discharges from industrial dischargers into its system is not altered or changed by the Salt Control Program.</i>
We received a Notice to Comply for two facilities with the same Facility/Place ID, but different CV-SALTS ID's. One is for our WDR Order for Land Application and the other is for our WDR General Order for Recycled Water. Do I need to register both even though the discharge to the Recycled Water Fill Stations (General Order) is supplied from the discharge of the Water Recycling Facility (WDR)?	<i>Many facilities have more than one permit and the community fee category adjusted for multiple permits.</i>
We did not receive a CV-SALTS ID for our NPDES Surface Water Discharge Order. Should we have received another ID for the NPDES Order?	<i>Please email cvsalts@waterboards.ca.gov the specific information of your facilities and order numbers so that the Central Valley Water Board can research this further.</i>
What criteria was used to select the sites listed on my NTC?	<i>All permittees that are expected or have the potential to discharge salinity (i.e., most permittees) received an NTC.</i>
Did only surface water dischargers get these letters, or did land dischargers also get them and have to comply?	<i>This includes discharges and threatened discharges to both surface water and land.</i>

Salt Sources

We all know there is salt in the mountains. With snow rainfall and salt being used on roads, what is the impact to the valley?	<i>The P&O Study will be characterizing salt sources and impacts conditions throughout the region. Caltrans will be a participant in the study.</i>
In the previous studies, do they show a primary contributor of salt to the water? Ag vs. municipal? I'm thinking of individual home water softening systems which use quite a bit of salt.	<i>All uses of water contribute salts, Ag usage and community residents are significant contributors of salts. The P&O study will evaluate the impacts of residential softening from salt-based systems.</i>
What compounds are included in "salt"?	<i>The basin plan amendment defines salinity as: electrical conductivity, total dissolved solids, fixed dissolved solids, chloride, sulfate, and sodium.</i>

Webinar Questions and Answers

Permit Changes

<p>Will NTC's associated with previous WDR permits be rescinded? If so, can a letter with permit status be provided or is another means required?</p>	<p><i>If a permittee's WDR is rescinded and they no longer have an active permit, they will be removed from the program. The Central Valley Water Board can provide email confirmation of their removal or a hard-copy letter, if requested. If a permittee's WDR is replaced by a new order, The Central Valley Water Board will maintain their CV-SALTS ID and update its database with the new order number. A permittee with an active permit must still comply with the program requirements, even if their NTC references their older order. The Central Valley Water Board can issue a correction letter, if requested.</i></p>
<p>Will future individual WDR's issued by the Regional Board defer to compliance with the Salt Control Plan for dealing with salinity limitations OR will there be additional restrictions that a facility will have to comply with?</p>	<p><i>This will depend on the individual permit and pathway choice. For example, if a permittee joins the P&O study and is maintaining existing salinity minimization practices, the WDR may defer to the Salt Control Program requirements. If the permittee has no requirements for salinity minimization, additional measures may be required by the program they are in.</i></p>

Other Regulatory Programs

<p>Have the NTC been issued for both the salt and nitrate control programs?</p>	<p><i>Nitrate Notices to Comply were issued in May 2020 for dischargers in the six Priority 1 subbasins for nitrate: Turlock, Modesto, Chowchilla, Kings, Kaweah, and Tule. A Notice to Comply will be issued between 2022 and 2024 for Priority 2 Groundwater Basins: Yolo, Merced, Kern County (west side south), Tulare Lake, Kern County (Peso), Delta Mendota, Eastern San Joaquin, and Madera.</i></p>
<p>Is there a similar Notice and NOI filing coming for Nitrates?</p>	<p><i>The P&O Study will include coordination with the Groundwater Sustainability Agencies (GSAs) formed under the Sustainable Groundwater Management Act (SGMA).</i></p>

Responsibility

<p>Again - why is the cost burden being allocated to producers and not to the end beneficiaries (i.e., consumers) - and to the state for past mismanagement of resources???</p>	<p><i>The P&O Study will be looking at all possible sources to fund management actions needed to have a sustainable water supply and expects that funding will be needed from State, Federal and Local levels to adequately manage salt sustainably. All water users are believed to be beneficiaries.</i></p>
<p>Given that a large portion of the salt problem is the direct result of government mismanagement of water and other resources - particularly exporting water to LA and the Southern Valley, which causes greater salinity in the Delta by decreasing flushing flows - why isn't this burden being placed on taxpayers instead of resource users???</p>	<p><i>The P&O Study will be characterizing all salt sources and conditions throughout the Valley and assessing salt management strategies.</i></p>

PERMIT PATHWAYS

CHOOSING A PATHWAY

Coalitions

Earlier you mentioned ILRP clients are covered by their coalitions. Do they have the option to choose their own pathway?

No. The coalition determines the pathway and pays the fee for its members. To make a different determination you would need to no longer be a member of the coalition.

Applicability

For a municipality with a WDR, if some of our settling ponds meet the 900 us/cm and other ponds don't. Is it recommended to take the alternative pathway since not all the ponds meet the 900us/cm criteria, or is there still a possibility to take the conservative pathway?

The Alternative Pathway is likely a more cost-effective approach. It is unlikely that you could economically take the conservative path. To meet the Conservative Pathway permitting option, the permittee is required to show that discharges from the facility in its entirety can comply with applicable MUN and AGR conservative values and antidegradation.

We maintain a school septic system in the Sacramento Valley Foothills about 3000 ft amsl - how will this apply to our site?

If you received an NTC, you are required to comply with the Salt Control Program. You have the option to consider and choose which permitting pathway is appropriate for the facility. For many permittees, the Alternative Pathway will be most cost-effective. For guidance on the specific requirements visit [cvsalts.info](https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_guidance.pdf) and the guidance document at https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_guidance.pdf.

Wineries covered by WDRs that discharge to their vineyards should follow Path A?

It is not the discharge location, but quality of the discharge that determines eligibility for following Path A. The Alternative Pathway is likely a more cost-effective approach.

Same question as David J above, if a winery discharges their process wastewater to a vineyard under its WDR, but that vineyard is also enrolled in an ILRP, which takes priority for this program?

If you received an NTC you will be participating in both programs. The permits and fees are separate. Neither fee will be significant for small facilities such as yours.

Will the lead entity confirm we can choose the Alternative Pathway aka Pathway 2?

Regulated discharges can select the Alternative Pathway. Please note that if you are a member irrigated lands, dairy/bovine, or poultry coalitions, your coalition has already made this selection. If you elect the Alternative Pathway, you must sign the participation agreement (online), pay the fee (online or by check), and submit your NOI with your payment receipt.

Webinar Questions and Answers

Current Requirements

<p>Farmers using the Integrated Farm Drainage Management (IFDM) are exempted from ILRP reporting and therefore not part of coalitions. How do this impact farmers using IFDM?</p>	<p><i>If you received a NTC you will be participating in both programs. The salt compliance program and fee are separate.</i></p>
<p>Do those small wineries and food processors whose permits have antidegradation language in them meet Path A?</p>	<p><i>Not necessarily. If a Discharger selects Path A, the Central Valley Water Board will re-evaluate the facility and its ability to comply with the Salt Control Program and the Path A requirements. This evaluation is independent of existing permit conditions.</i></p>
<p>If a facility is evaluating zero discharge, would the zero discharge need to be fully implemented prior to the data of 7/15?</p>	<p><i>Yes. Further, the facility would need confirmation that it is no longer subject to Central Valley Water Board authority, which is necessary for any discharge or threatened discharge.</i></p>
<p>If we have an Annual Average EC effluent limitation in our current NPDES, does this have any bearing on determining pathways or fee schedules?</p>	<p><i>The Salt Control program contains specific provisions for NPDES discharges considering the conservative approach. Under the conservative approach, the Central Valley Water Board must use conservative, numeric values to protect either the agricultural beneficial use (AGR) or the municipal beneficial use (MUN), which is the more sensitive beneficial use. The AGR numeric value is evaluated as a monthly average and MUN is evaluated as an annual average. It is recommended that you review the provisions in the Basin Plan and discuss this further with your permit writer.</i></p>
<p>Municipal wastewater treatment plants under WDRs have to perform Salt Minimization Studies and associated reporting. Does this salt control program tie into the ongoing salt minimization reporting through WDRs? Is this in lieu of the salt minimization compliance required per WDRs?</p>	<p><i>The purpose of the Salt Minimization Studies is to identify reasonable and feasible methods for reducing salts and continuing reasonable actions to control salts during Phase I of the Salt Control Program. Under the Alternative Permitting Approach, the Central Valley Water Board must require discharges to continue to implement, reasonable, feasible and practicable efforts to control levels of salt in discharges.</i></p>

Switching Pathways

<p>Can you switch back and forth between the options? Are you locked into one option?</p>	
<p>Is there an off ramp? Meaning, can you select the collaborative pathway then move over to the conservative pathway once adequate data is available?</p>	<p><i>Changing pathways is permissible but is subject to meeting certain conditions and Central Valley Water Board approval.</i></p>
<p>Once you choose alternative pathway, are you locked in to paying for the 10-15 years? Will the study itself release participants when determined that they are not causing significant salt loading?</p>	

Webinar Questions and Answers

ALTERNATIVE PATHWAY

Irrigated Lands Coalitions

Are the ILRPs participating in the alternative pathway?	<p><i>Most are. The Tule and the Sacramento Valley ILRPs are still determining their compliance approach. Contact your ILRP coalition for additional information:</i></p> <p>https://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/regulatory_information/for_growers/coalition_groups/</p>
Do Vineyard Operators who participate in a monitoring coalition need to comply individually with this program?	<p><i>Vineyard operators that are part of an Irrigated Lands coalition do not need to comply with this program individually. Coalitions are addressing compliance with the Salt Control Program for all their members.</i></p>

Current Requirements

I currently operate under a small winery waiver (R5-2020-0002), which was just renewed last year. If I select the alternative path, can I continue to operate under this current waiver until it expires in 2025?	
For the alternative approach, the Notice to Comply says – continue implementation of performance-based measures and existing salinity management program/best management practices – if the site does not have a salinity management program are they required to just meet their existing discharge permit requirements and no additional salinity requirements?	<p><i>Yes. Dischargers choosing the Alternative Pathway continue to be subject to existing salinity requirements in their current permits unless revisions are necessary for consistency with the Alternative Pathway.</i></p>
Since the alternative pathway provides you with a temporary exemption to the stringent salt standards, but you still have to do your best to comply with those standards, what level of exemption or leeway is provided? Up to what point does the alternative pathway exemption last?	<p><i>Dischargers choosing the Alternative Pathway must continue to meet salinity requirements in their current permits that are related to implementation of reasonable, feasible, and practicable efforts to control levels of salt in discharges. Relief from meeting stringent salt standards is for the duration of the P&O Study and the current basin plan amendment. The P&O Study will result in changes to the basin plan and new or different requirements for Phase II.</i></p>

Webinar Questions and Answers

Participation

How will entities be able to participate along this journey?	<i>The Central Valley Water Board will be updating your permit requirements moving forward, and they will be communicating with you. By abiding by those terms, and paying the P&O Study fees, you will be in compliance. If you are over a certain salinity threshold, you may need to have a salinity minimization plan. These requirements are intended to ensure continued implementation of reasonable, feasible, and practical efforts so that they do not cause undue burdens on dischargers while studies are underway regarding long-term solutions.</i>
In the Alternative Approach, beyond paying fees, what will the "Participation" requirements be?	<i>Participating in the Alternative Pathway only applies during Phase I for approximately 10 years. As the Salt Control Program moves into Phases II and III, there will</i>
Other than paying annual fees, will other requirements/data will be required during the P&O study?	<i>be new requirements based on the Phase I study results. it will determine which dischargers participate and how.</i>
If an entity selects the Alternative Pathway, pays the fee, and submits the certificate, what ongoing participation is expected as part of the P&O study?	<i>Regulated dischargers and others can participate in the CV-SALTS activities, including the P&O Study, at the level they choose. As the studies develop, there will also be opportunities to participate in regional studies and planning.</i>
In clarification to my first question, in the Alternative Approach, what will we be required to do in the first part of the study beyond paying fees?	

Webinar Questions and Answers

CONSERVATIVE PATHWAY

Antidegradation

To qualify for the conservative pathway, Step 4 of the draft guidance requires a discharge to “not result in degradation in a receiving water now or in the future (over at least a 30-year planning horizon).” What is meant by this? Can a discharge that complies with the conservative 700/1,000 thresholds qualify for the conservative approach even if their discharge EC is greater than background receiving water? For example, POTWs in the Sierra foothills have fairly low EC (<400), albeit the discharge EC is greater than background receiving water (snow melt). Essentially, can POTWs in the foothills qualify for the conservative approach?

It is possible that dischargers located in the foothills may be especially suited to taking the Conservative Pathway. However, the Salt Control Plan requires that the Central Valley Water Board find that allowing the permittee to degrade a 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. Notably, this is a complex topic, and you should contact the Central Valley Water Board at cvsalts@waterboards.ca.gov.

If discharge is to percolation basin but background GW is >700 uS/cm can we demonstrate that: 1. The discharge does not increase salinity above background and 2. Regulatory controls are in place to trigger remedial measures if the discharge in future causes increase above background?

Questions regarding your specific circumstances should be directed to the Central Valley Water Board at cvsalts@waterboards.ca.gov.

Is the scope of the antidegradation analysis be limited to salts?

Yes, it can be broader, but must include salts for this program.

How recently should an Antidegradation Analysis have been completed to be considered sufficient?

The analysis must be recent enough to reflect current conditions. This is a complex topic, and you should contact the Central Valley Water Board at cvsalts@waterboards.ca.gov.

Conservative approach needs salinity characterization report and antidegradation analysis? Or is an engineer's antidegradation analysis enough?

Questions regarding your specific circumstances should be directed to the Central Valley Water Board at cvsalts@waterboards.ca.gov.

What if receiving water does not meet conservative limits? Are you eligible to discharge higher salinity as long as it does not further degrade degraded water?

At a minimum, the discharge must be able to meet conservative limits. For questions specific to the impact to the receiving water, you should contact the Central Valley Water Board at cvsalts@waterboards.ca.gov.

Assessment

The City of Sacramento has a Combined Sewer System that discharges into the Sacramento River during times of severe storm events and discharges are rather infrequent. How extensive will the analysis be for a discharger that discharges to the Sacramento River anywhere from 1 to about 6 times a year?

This Q&A provides general responses to questions. For specific questions, you should contact the Central Valley Water Board at cvsalts@waterboards.ca.gov.

Webinar Questions and Answers

<p>Does each farmer need to do these assessments if they chose the conservative approach?</p>	<p><i>Growers that are part of an Irrigated Lands Regulatory Program coalition do not need to conduct any assessment. If a grower does not agree with the coalitions' chosen approach, the grower should contact their coalition directly.</i></p>
---	--

Board Review

<p>If an entity takes the conservative approach and receives approval, what are the risks if regional salinity degradation continues?</p>	<p><i>The Board will determine if the discharger is abiding by their individual Conservative Pathway requirements. For more information email cvsalts@waterboards.ca.gov.</i></p>
---	---

<p>What happens if the Water Board determines the discharger does not meet the requirements of the Conservative Approach after NOI and reports have been submitted?</p>	<p><i>The entity will then need to re-consider participating in the P&O Study. Notably, however, if an entity enters the P&O Study after the original due date, they may be assessed back fees by the entity administering the P&O Study.</i></p>
---	---

<p>How will the Regional Board determine what is in the maximum interest of the people of the state when evaluating whether a discharger can go with the conservative approach? Even if other aspects are in the discharger's favor, this item could bump folks into the alternative approach. Thanks.</p>	<p><i>The Salt Control Program requires that the Central Valley Water Board find that allowing the permittee to degrade high quality water under the Conservative approach better serves the people of the state rather than their participation in the P&O Study for Phase I of the Salt Control Program.</i></p>
--	--

Documentation

<p>For the conservative approach, how does a WWTP show that there will be no degradation in the future (over at least a 30-year planning horizon), as required by the Guidance document?</p>	<p><i>Discuss your specific facility with your permit contact at the Central Valley Water Board. Most consultants working with wastewater facilities are familiar with the requirements for Antidegradation determinations needed by the Board.</i></p>
--	---

<p>Conservative NTC Approach: Will data be submitted via CIWQS or will a new/separate data submittal platform be utilized?</p>	<p><i>If the permittee normally submits through CIWQS, that would not change. Not all programs use CIWQS, so it would be program-specific.</i></p>
--	--

<p>The NOI form for Pathway 1 (Conservative Salinity Permitting Approach) requires an evaluation of whether discharge results in exceedance of applicable threshold or threatens to cause additional degradation of groundwater. Is documentation of a discharge to a land application area with concentrations less than the 700 uS/cm objective adequate to demonstrate that the discharge does not cause additional groundwater degradation even if the shallow groundwater concentrations under the site are elevated above the WQO? Or would more rigorous studies be required to assess the causes of impacts beneath the site?</p>	<p><i>Discuss your specific facility with your permit contact at the Central Valley Water Board.</i></p>
---	--

Webinar Questions and Answers

<p>My agency has just completed and received an annual wastewater discharge report. Would that contain information that would be similar in the salt characterization report?</p>	<p><i>The response to this question is dependent on the information contained in your annual waste discharge report. For more information, contact the Central Valley Water Board at cvsalts@waterboards.ca.gov.</i></p>
<p>Does background Electrical Conductivity (EC) and Total Dissolved Solid (TDS) for effluent and receiving waters need to be submitted? If so, how many years of data would be sufficient?</p>	<p><i>Yes, to conduct a proper evaluation, effluent and receiving water data needs to be evaluated and submitted if you select the conservative permitting approach. There is no exact number of years identified, but the amount of data must be sufficient to characterize the existing discharge and receiving water limits under variable hydrologic conditions.</i></p>
<p>Why wait until now to let us know of the need for these Assessment Studies that may or may not qualify us for the Conservative Pathway?</p>	<p><i>Many facilities have been participating in CV-SALTS for more than 10 years. These requirements have been in the draft and final basin plan for almost two years. Despite significant outreach some permittees were unaware of these changes by the Central Valley Water Board. The Alternative Pathway will be used by most who have not already completed such studies and data collection.</i></p>
<h3>EC Criteria</h3>	
<p>Which EC criteria should the facility abide by if the facility is neither agricultural or municipal?</p>	<p><i>The criteria are based on the beneficial use of the water that you discharge to, groundwater or surface waters, not based on the facility.</i></p>
<p>What EC criteria should the facility abide by if the incoming source of water has an EC of more than 900 uS/cm?</p>	<p><i>You would not be able to meet either criteria and the alternative path would be the only option for your facility.</i></p>
<p>Background EC is >700 uS/cm. Site is surrounded by irrigated crop land. Can background be considered with respect to demonstrating Pathway 1?</p>	<p><i>The key determination is the quality of the discharge and if it can meet the conservative numeric values for EC.</i></p>
<p>Would you still qualify for the conservative approach if unlined ponds exceeded 700 due to water recycling but final discharge is less than 700?</p>	<p><i>The Alternative Pathway is likely a more cost-effective approach. It is unlikely that you could economically take the conservative path. To meet the Conservative Pathway permitting option, the permittee is required to show compliance with applicable MUN and AGR conservative values and antidegradation.</i></p>
<p>You might clarify if the 700 EC is applied to the point of discharge or first encountered groundwater.</p>	<p><i>The conservative numeric values apply to the discharge itself.</i></p>
<p>Is the EC threshold the only threshold currently established or is there thresholds established for the other constituents related to salt in effluent water sources?</p>	<p><i>Currently, the only threshold is EC.</i></p>

Webinar Questions and Answers

Where is the EC threshold applied? Is it at the point of discharge or at the first monitoring well at groundwater?

The point of discharge.

Monitoring

Some regulated septic systems in the foothills treat small residential communities that can have low salinity in their discharge because the community is supplied with mountain water. However, the salinity data for such systems may be quite limited relative to the EC monitoring/data requirements recommended in the draft guidance for the conservative approach. Is the Regional Board open to working with the data on-hand for these or other dischargers so that they can go with the conservative approach?

Facility-specific information would be needed. However, the Board would consider a mass balance calculation under certain scenarios and depending on the size of the data set, Monte-Carlo or representative statistical projections may be needed. Contact cvsalts@waterboards.ca.gov and provide your CV-SALTS ID. The Central Valley Water Board can follow up with the appropriate program staff to explore data options.

The Guidance document states that three receiving water monitoring locations are needed- upstream, immediately downstream, and further downstream where the discharge is fully mixed with the receiving water. If a WWTP's NPDES permit only requires an upstream and downstream monitoring location, is this sufficient? Further, the Guidance document states that a minimum of monthly data is needed. If WWTP groundwater monitoring requirements only require quarterly monitoring of EC, is this sufficient?

Unless there has been a material change in the discharge or there has been large variations in the salinity levels over time, longer data sets should be adequate. Please confirm with your permitting staff.

I am at a campsite and have three different ponds sites and don't discharge year-round. What if I don't have monitoring wells?

Facility specific information would be needed. Please contact the Central Valley Water Board for further questions.

Permit Process

Conservative NTC Approach: Will the NPDES permit be altered with new discharge limits?

Changes to a permit will depend on existing permit conditions and the facility. If the facility meets the requirements of the Conservative Pathway with their current permit provisions, no future changes may be needed. If the permittee demonstrates that a change or addition of permit limitations will be needed to meet the Conservative Pathway, updates to the permit will be required.

Would an example of the "conservative option" be continuing to comply with an Individual WDR or would we need to engage in a new permitting process?

To determine compliance with the Salt Control Program, you need to evaluate the requirements in the Basin Plan. Existing permits may not comply with such provisions and may need to be updated.

FEES, PAYMENT PROCESSES & FILING

Fees

<p>My client is a gravel mining site and only uses water over a very small portion of the overall site. How may I find out how the fee is determined?</p>	<p>The payment portal is available at https://www.cvsalinity.org/po-fee-form. You will need your CV-SALTS ID # from your NTC to get started.</p>
<p>We have a closed landfill we are in the process of capping (inactive). Will there be a fee for this, or are only active landfills included?</p>	<p>The payment portal is available at https://www.cvsalinity.org/po-fee-form. You will need your CV-SALTS ID # from your NTC to get started. All permitted facilities must comply.</p>
<p>For Oil & Gas: How will be assessment be based for "each pond facility"? If there are several small ponds in a "facility", is it assessed as one, or is each pond assessed individually? Currently, the State Water Board assesses the WDR holders for the volume discharged at each facility, which might consist of several "ponds".</p>	<p>CIPA worked with the industry to assist us with a way for large and small producers to pay a fair share. Each Pond listed in your Permit should be counted and the total entered online. The payment portal is available at https://www.cvsalinity.org/po-fee-form. You will need your CV-SALTS ID # from your NTC to get started.</p>
<p>Could you explain how CSDs, PUDs, MWCs need to comply with these orders of compliances, if they are categorized as representing Disadvantaged, and/or Severely Disadvantaged Communities? Who should they be reaching out to with concerns in not being able to pay the fee for the development of their letters of intent?</p>	<p>Many of these facilities will have lower costs by participating in the Alternative Pathway. The Central Valley Water Board is required by law to protect groundwater from increasing salinity, including from facilities in disadvantaged communities. The fee structure is designed to avoid costly facility upgrades until studies can find cost-effective salt solutions in these and other communities.</p>
<p>What about wineries that do not produce (i.e., no bottling and no crush) and are bulk terminals only? Will fees be prorated?</p>	<p>The Central Valley Salinity Coalition is working with the Wine Institute to assign them on an equivalent basis to wineries, likely based on wastewater produced. You can send the details directly to dcozad@cvsalinity.org.</p>
<p>What if a winery is a crush only facility and does not bottle onsite? Should the gallons produced be converted to cases, even though there is no bottling?</p>	<p>Yes. Convert your total production to standard case equivalents. You can send the details directly to dcozad@cvsalinity.org.</p>
<p>Is the case production bracket equivalent of gallons produced or just bottled wine produced? If fee calculation is based on case production, what does apply for wineries producing more than 500,000gal/year but case production (bottled wine) less than 5,000?</p>	<p>Yes. Convert your total production to standard case equivalents. You can send the details directly to dcozad@cvsalinity.org.</p>
<p>How will fees be determined for small discharges less than 1MGD (10,000gpd)?</p>	<p>The payment portal is available at https://www.cvsalinity.org/po-fee-form. You will need your CV-SALTS ID # from your NTC to get started. All permitted facilities must comply but are ratioed to permitted size.</p>

Webinar Questions and Answers

Do you have a cost for each participant based if they choose the alternative pathway?	The payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
Would there be any consideration for a fee reduction consideration for a non-profit de minimis discharger.	The payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started. Limited impact dischargers are the lowest cost.
If you have two surface water discharge permits for a single facility, are two fees required (if two Notices to Comply were received)?	Yes, two fees are required but they were reduced as they are at the same facility. The payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
Will County LAMP updates include a CV-SALTS review and fee assessment for Counties for their onsite system inventory?	LAMP updates will include CV-SALTS requirements as appropriate. They will likely be required to participate in the future.

Fees Category

Where does Aquaculture fall under?	Your industry is "other" and the payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
What type of industry would a Walnut Huller be considered?	Food Processor, and the payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
What if you are a POTW that accepts food processing wastewater? How would we be characterized in the payment program?	POTW, and the payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
Would remediation or pump and treat projects fall under community?	Other, unless the permit is held by a community, and the payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.
On the payment form, is a POTW considered a "community" or "other"?	Community, and the payment portal is available at https://www.cvsalinity.org/po-fee-form . You will need your CV-SALTS ID # from your NTC to get started.

Fees for Coalition Members

For clarification purposes: dairies and bovine facilities in good standing with the CVDRMP will not need to submit a NOI, and those fees currently paid to CVDRMP, will pay for the enrollment in the CV Salts program? And these facilities will automatically be enrolled in the alternative pathway?	Yes.
---	------

Webinar Questions and Answers

If we are part of Sac Valley, do we have to file on our own or are they filing for us just not paying the fees?

Contact the Sac Valley to determine your approach, they are not participating in the P&O Study. For irrigated agriculture (non-rice) in the Sacramento Valley contact Bruce Houdesheldt at Northern California Water Association (NCWA) to discuss. (916) 952-1287

Fees Frequency

For wastewater treatment plants are the fees one time or determined on an annual basis? Thanks.

Is the Alternative Pathway fee one time, annual, and if annual, for how many years?

Are the fees yearly or a one-time fee?

Are these annual fees?

Is fee a one time or annual?

Will this be a yearly fee?

Is the PO fee a one-time or annual fee?

The fees are paid annually through Phase 1, which will be 10-15 years.

Future Fees

For budgeting purposes, can we get a total fee that is owed before actually paying it? We did not budget for this in our current fiscal year and will need to budget in March/April for next year (July 1).

Yes, the payment portal is available at <https://www.cvsalinity.org/po-fee-form>. You will need your CV-SALTS ID # from your NTC to get started.

Do the fees increase over time?

Are the fees scheduled to increase in the future or remain flat?

How will the fee structure be determined once the compliance strategies are defined and we move toward implementation?

The fees will be set each year by the Central Valley Salinity Coalition based on the activities and budget for the P&O Study.

Part of the P&O study will be to determine the costs and fees for compliance strategies and implementation.

Paperwork

If you pay for P&O online, do you still have to submit an NOI?

Will a facility need to fill out a NOI if they sign a CVSALTS participation agreement and pay fees (i.e., CVSALTS will perform the enrollment with the Board)?

Yes.

Webinar Questions and Answers

Who should sign the participation agreement? Plant Manager? Legal language outlining proper signatory authority? Thanks much!	<i>The Legally Responsible Official for the permit or knowledgeable about the facility and authorized to sign the agreement should sign it.</i>
---	---

Will the lead entity supply us with all the necessary documentation to submit with our NTC to ensure we are in full compliance?	<i>If you elect the Alternative Pathway, you must sign the participation agreement (online), pay the fee (online or by check), and submit your NOI with your payment receipt.</i>
---	---

When do the participation agreements need to be turned in to CVSALTS?	
---	--

Payment Process

What did you click on that website to pay the invoice?	<i>See the website demo in the webinar recording or presentation posted at cvsalts.info. The demo begins at 45:20.</i>
--	--

Can you pay by check?	<i>Yes. Select the pay by check option in the payment portal.</i>
-----------------------	---

What if your operation has greater than 10 ponds in the fee payment process?	<i>The Central Valley Salinity Coalition will be updating the portal to allow up to 60 ponds; if you have more than 60 ponds contact the CVSC directly at dcozad@cvsalinity.org.</i>
--	---

Is Daniel the correct contact as “Lead Entity” who will set the appropriate pay schedule for facilities seeking the alternative pathway?	<i>Your fees are identified as you complete the fee payment process at www.cvsalts.info. If you have questions or technical problems with the payment process, email info@cvsalinity.org.</i>
--	--

Webinar Questions and Answers

P&O STUDY

<p>How will rainwater infiltration for recharge be evaluated? Could this be also considered in determining benefits and offsetting the salt load for end of pipe discharges?</p>	<p><i>The P&O Study will be considering all possible salt management options, including groundwater recharge.</i></p>
<p>With regards to protecting ground water quality, will CV SALTS include regulation that will limit grower's ability to leach salts from the effective rootzone? Or will this be something that is looked at during the P&O Study before being decided?</p>	<p><i>The P&O Study will be considering all possible salt management options, including regulatory approaches.</i></p>
<p>Haven't the studies been going on since 2006? Why have we been paying for the CV-Salts Special Projects Due & CVCWA Dues, if we are going to have to pay for additional 10 years under the Alternative Program?</p>	<p><i>Most of the studies in the last phase of CV-SALTS were related to nitrate and did not meet the requirements of the Central Valley Water Board and the stakeholders. The Central Valley Water Board determined that additional time was needed to develop the information needed for a comprehensive Salt Control Program that meets stakeholder and Central Valley Water Board needs. Participation in the P&O study is optional. With respect to CVCWA-related special project dues, please contact CVCWA directly.</i></p>
<p>Will entities in areas where salinity issues are currently much more of a problem have to contribute more to the P & O study than entities in areas where it isn't as much of an issue? It seems the former would derive a larger benefit than the latter from salt management activities.</p>	<p><i>The P&O Study will be characterizing salt sources and conditions throughout the Valley and identifying salt management areas and management strategies to account for differences. Most industries adjusted the fees based on salt impacts in some manner.</i></p>
<p>What kind of time frame are you looking at for a resolution to the salt problems? How do you plan to measure progress? What will be done to modify requirements when progress (or regress) is observed?</p>	<p><i>Phase 1 of the P&O Study is expected to take approximately 10 years. The Study will identify the priorities for action, progress measurement, and adaptation approaches.</i></p>

PROGRAM SUGGESTIONS

<p>There is a new technology (Cloud SCADA®) for combining hundreds of community water systems into regional water systems for data sharing and improved operations via high performance analytics. Does the Water Boards have an innovation team that can help water agencies understand these new technologies and the huge impact they can have on their water systems and water quality?</p>	<p><i>The Central Valley Water Board does not have an innovation team. The State Water Resources Control Board does have staff who focus on streamlining data collection and transparency, but Central Valley Water Board staff are not aware of anyone working on Cloud SCADA.</i></p>
<p>Is it even theoretically possible to leach the existing salt loads from the soil? And would this result in groundwater impairment? I'd like to hear more about the possibility of establishing a sustainable loading that won't result in groundwater impairment.</p>	<p><i>The P&O Study will be characterizing salt sources and conditions throughout the Valley and assessing salt management strategies, including sustainable loadings.</i></p>
<p>Southern California has a long history of struggling with salts. What successes and failures of regulatory programs in southern California were looked at in development of a salt control program in the central valley?</p>	<p><i>The P&O Study will include consideration of management strategies applied in other areas of California and other regions.</i></p>
<p>Not a question but a comment...If you are ever looking for potential peer input from a similar type of organization with similar, albeit surface water-focused water quality challenges, you might consider a reach out to the Tampa Bay Estuary Program (https://tbep.org/)...TBEP is a multi-partnered, multi-functional team of municipal, regulatory, industrial, agricultural, environmental, and community-based entities and individuals seeking to identify and implement feasible, practical methods to affect sustainable change and improvements to ensure the near and long term health of the Tampa Bay estuary.</p>	<p><i>Thank you for the suggestion.</i></p>
<p>USDA Natural Resources Conservation Service actively fund salinity management projects in the Central Valley. Is there room to partner to make stakeholders aware of funding?</p>	<p><i>Yes. Please contact the program at info@cvsalinity.org.</i></p>
<p>Are you going to offer or provide technology solutions for facilities including onsite recovery and recycling, and also salt separation? We are a technology provider, and we have one patented technology product which may be of interest. Most likely it has to be pilot tested. We don't know who to contact or where is best to begin as we don't work in this space. You can contact me at ayazdani@exergycorp.com.</p>	<p><i>The P&O Study will be assessing a full range of salt management strategies.</i></p>
<p>USDA Ag Research Service has a Salinity Lab in Riverside. Has CVSALTS collaborated with the Salinity Lab on monitoring and data collection? For example, Dr. Corwin did a study in the Central Valley "Remote sensing is a viable tool for mapping soil salinity in agricultural lands"</p>	<p><i>There are some great developing methodologies for detecting near surface salinity and impacts on the crops. This may help Ag deal with rising salinity and manage its impacts. However, much of the basin lies well below the root zone and must be managed for both Ag and Municipal/Domestic drinking water.</i></p>

Webinar Questions and Answers

INFORMATION REQUESTS

Is there a publicly available database where we can see the CV-SALTS IDs and Assessor Parcel Numbers or similar location information?	<i>No there is not a publicly available database. However, you can email cvsalts@waterboards.ca.gov to request a list of CV-SALTS IDs and associated Facility information.</i>
As a regulator, how can I determine which of my water systems have received the letter mentioned here? Is there a database to check?	
Is there Regional Board guidance available for development/contents of the assessment and the Salinity Characterization Report?	<i>The guidance document is available at https://www.waterboards.ca.gov/cvsalts/forms_temps_guide/salt_guidance.pdf.</i>
Can you pls provide the link to the guidance document that Tess noted in her presentation related to the salt characterization report?	
Is there a map showing the de-designation areas for CVSALTS for MUN, AGR, etc.?	<i>There is no single map for the region that shows both surface and groundwater de-designations, but you can email cvsalts@waterboards.ca.gov to request a map for a specified area.</i>
I am sure the lead entity is inundated with calls and questions. What kind of time frame can we anticipate before we should expect a response or answers specific to our facility?	<i>This Q&A provides general responses to questions. For specific questions about the fees and payment portal for the Alternative Pathway, email info@cvsalinity.org.</i>
For those irrigated agriculture (non-rice) in the Sacramento Valley and small wineries contact Bruce Houdesheldt at Northern California Water Association (NCWA) to discuss. (916) 952-1287	<i>Comment noted.</i>