

Agenda

Sacramento Suburban Water District Government Affairs Committee

3701 Marconi Avenue, Suite 100
Sacramento, CA 95821

Thursday, February 5, 2015
6:00 p.m.

Public documents relating to any open session item listed on this agenda that are distributed to the Committee members less than 72 hours before the meeting are available for public inspection in the customer service area of the District's Administrative Office at the address listed above.

The public may address the Committee concerning any item of interest. Persons who wish to comment on either agenda or non-agenda items should fill out a Comment Card and give it to the General Manager. The Committee Chair will call for comments at the appropriate time. Comments will be subject to reasonable time limits (3 minutes).

In compliance with the Americans with Disabilities Act, if you have a disability, and you need a disability-related modification or accommodation to participate in this meeting, then please contact Sacramento Suburban Water District Human Resources at 679-3972. Requests must be made as early as possible and at least one-full business day before the start of the meeting.

Call to Order

Roll Call

Public Comment

This is an opportunity for the public to comment on non-agenda items within the subject matter jurisdiction of the Committee. Comments are limited to 3 minutes.

Items for Discussion and Action

- 1. Committee Statement of Purpose**
Review committee's statement of purpose.
- 2. Regional Water Authority Legislation Goals**
Receive written staff report.
- 3. Hexavalent Chromium 6**
Receive written staff report.

4. Statewide National Pollutant Discharge Elimination System (NPDES) Discharge Permit

Receive written staff report.

5. Development of Regulations to Implement the Sustainable Groundwater Management Act of 2014 (SGMA) and Potential 2015 Groundwater Legislation

Receive written staff report.

Adjournment

Upcoming Meetings:

Monday, February 23, 2015 at 6:30 p.m., Regular Board Meeting

Monday, March 16, 2015 at 6:30 p.m., Regular Board Meeting

I certify that the foregoing agenda for the February 5, 2015, meeting of the Sacramento Suburban Water District Government Affairs Committee was posted by February 2, 2015 in a publicly-accessible location at the Sacramento Suburban Water District office, 3701 Marconi Avenue, Suite 100, Sacramento, California, and was made freely available to the public.

Robert S. Roscoe
General Manager/Secretary
Sacramento Suburban Water District



Government Affairs Committee

Agenda Item: 1

Date: January 30, 2015

Subject: Committee Statement of Purpose

Staff Contact: Christine Bosley, Executive Assistant to the General Manager

The Government Affairs Committee was formed to keep Committee members apprised of potential opportunities and risks to the agency by the political and administrative actions of other government organizations with jurisdictional relationships to the District.

The attached Statement of Purpose was adopted by the Committee at its first meeting on September 11, 2013. The Government Affairs Committee meets tentatively every third month.

Government Affairs Committee

Statement of Purpose

As a public government entity, the Sacramento Suburban Water District, represented by its Board of Directors, has the responsibility to analyze the opportunities and risks to the agency created by the political and administrative actions of other government organizations with jurisdictional relationships to the District. The purpose of the Government Affairs Committee is four fold:

- To identify the opportunities and risks associated with government action or inaction as they relate to the mission of the District.
- To inform the full Board of these opportunities and risks.
- To devise strategies which provide direction to staff for implementation.
- To support District activities in the implementation of strategies.

The Government Affairs Committee will accomplish this purpose by working with staff to identify and prioritize the relevant and important issues that are challenging the District. It will support staff in devising the most appropriate process to address the priorities within the District's strategic plan goals and budget constraints. It will review agendas and strategic goals for addressing the strategies for consideration by the Board. And it will provide guidance to staff in selecting the resources and sequence of actions for implementing the appropriate strategies.



Government Affairs Committee

Agenda Item: 2

Date: January 29, 2015

Subject: Regional Water Authority Legislation Goals

Staff Contact: Dan York, Assistant General Manager

As previously reported at the November 17, 2014 Board Meeting, the Sacramento Regional Water Alliance's contract lobbying effort with Soyla Fernandez of Fernandez Government Solutions is being transitioned to a subscription program under the Regional Water Authority (RWA). RWA's bylaw changes of 2013 and this updated Strategic Plan both provide for and contemplate this transition. The seven water purveyor members of the Sacramento Regional Water Alliance (the Cities of Sacramento, Roseville and Folsom, San Juan Water District Carmichael Water District, Placer County Water Agency and SSWD) unanimously endorsed this transition.

The Program comprises engaging a contract lobbyist to support a state government advocacy program that will enhance RWA's ability to advocate on behalf of its Members and the Sacramento Region on legislative and regulatory matters, consistent with adopted RWA policy positions. The participants recognize the value of well-developed relationships with members of the state legislature and administration, active engagement on legislative and regulatory matters, development of a broad base of support, and the role of RWA as a regional representative to advance the region's interests in the water supplies, economic vitality, environmental sustainability, and quality of life of the greater Sacramento metropolitan area.

The Program work is expected to commence in January 2015 and continue through December 2016, with the option to continue for a subsequent, but undefined duration. The draft work plan for 2015 is attached as Exhibit 1. A new scope of work may be developed at least annually to guide the program. Per the agreement, it is anticipated that seven to twelve Participants will participate in the Program. Program costs will consist of monthly retainer payments to a registered California state contract lobbyist for legislative advocacy and related services, plus reimbursement of approved expenses and miscellaneous ancillary work by other vendors.

The cost of the Program, dependent on the number of participants, is estimated to be between \$10,000 and \$15,000 annually. This cost allocation was approved in the District's CY2015 Budget. Prior to the program being transitioned to RWA, the San Juan Water District held a contract with Fernandez Government Solutions with a Memorandum of Understanding between the participating agencies. The District's participating share for the services of the Fernandez

Government Solutions was \$15,000 annually. The transition to the RWA program is expected achieve minor cost savings as lobbying costs may be divided among more participating agencies.

In addition, attached as Exhibit 2, is the listing of pertinent California water committee members in Congress.

Strategic Plan Alignment

Leadership – 5.A. Engage in legislative affairs on issues affecting the District.

Leadership – 5.B. Engage in a leadership role with professional water industry groups to enhance proficiency in technical and policy matters.

Leadership – 5.C. Participate in regional, statewide and national water management partnerships.

Leadership – 5.D. Provide leadership within the community in a positive and progressive manner for the mutual benefit of the area (service groups, adjacent water purveyors, county/city/local government).

EXHIBIT 1

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

Project	RWA Role	Partners	Desired Outcomes	Deliverable	Actions	Key Personnel
Sustainable GW Management	Cleanup Legislation	SGA, SCGA, WPGA, ACWA	Reduce administrative and financial burden on RWA members' GW management activities.	Language for cleanup of "same methodologies." Coordinate with Sac County on language for <i>de minimis</i> pumpers. Evaluate other cleanup language.	Submit language to ACWA. Attend State Leg Planning meeting. Set up meeting with Tim Quinn.	Woodling, Swartz
	Streamline adjudication legislation	ACWA	Track for possible benefit to region.	Ongoing analysis of language.		Woodling, Bezerra
	Expedited recharge legislation	ACWA, CWF	Streamline ability to transfer water around region.	Possible legislation	Meet with CWF	
	Regulations/Guidance	ACWA, SGA, SCGA, WPGA	Create workable path to compliance for Sacramento and Placer County GW management that is consistent with existing efforts.	Identify needs on basin redefinition, coordination agreements, multiple agency basins, etc.	Meet with DWR (Gutierrez, Scruggs, Bardini, Macauley, etc) Propose steering committee for DWR. regulation development. Meet with Martha Guzman. Lead ACWA GW Committee work group.	Woodling, Swartz, Schmitz
Water Bond	Budget -	RWA	Fund programs	Correlate bond	Participate in	Identify

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

Implementation	Appropriations		Members	to promote projects and programs of RWA members.	chapters to RWA member needs. Identify appropriate administrative agencies.	ACWA workgroup on IRWM.	leads for each bond chapter
	Regulations/Guidance	Regional lead	RWA Members, ACWA	Promote the interests of RWA members and region. Reduce the costs of securing grants.	Comments on grant processes	Track development of grant programs.	Swartz
2015 Legislature	Regional Priorities	Regional lead	RWA Members	Promote legislation that supports RWA members' interests.	2015 Legislative and Regulatory Policy Principles	Monthly meeting of steering committee.	Woodling
	Outreach	Regional lead	RWA Members	Inform and educate staff and members representing RWA four-county region as well as water committee staff and members	Sacramento Region water briefing materials	Identify and hire staff resources. Post-election strategy meeting. Prepare Briefing materials	Woodling, Kohn, Soyla, Fecko, Peifer
	Tracking/Bill Analysis	Regional lead	RWA members, ACWA	Track water related bills of interest to members and public agency bills relevant to RWA.	Weekly summary report distributed to RWA members.	Begin bill tracking and analysis in January 2015.	Woodling, Bezerra, Gonzales, Hector
	Lobbying	Regional lead	Sac City, Sac	Maintain a	Create	Monthly meeting	Woodling,

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

SWRCB Drought Emergency Actions			County, NCWA, ACWA	presence at the Capitol to influence the outcome of legislation.	subscription program to fund lobbyist contract. Monthly report form lobbyist	of subscription program participants. Weekly call/meeting with lobbyist and counsel. Periodic coordination meeting of lobbyists/lobbyist employers.	Soyla, Karl, Knott
	Water Conservation Regulation Development	Regional lead	RWA Members, ACWA	State actions that contribute to regional conservation efforts.	--	Written and oral comments on proposals. Meeting with DWR WUE staff (Brostrom)	Talbot
	Water Use Reporting	Coordination, Data QA, Outreach	Data coordinated through RWA	Ensure timely and accurate reporting to SWRCB and leverage success.	Monthly summary of water use reporting and media outreach where appropriate.	Continue monthly collection of water use data from RWA member agencies and analysis of savings.	Talbot
	Curtailments	Coordination and information dissemination	Individual RWA members	Reasonable application of water rights priority system.	--	Track status of curtailments and report to RWA Board.	Woodling
	Temporary Urgency Changes	Coordination and information dissemination	RWA members, Water Forum, Sac Valley Water	Preserve Folsom storage for water supply and environmental	--	Track process and report to RWA Board	Woodling, Bezerra

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

				Users	benefit.	RWA comment letter. NSWA comment letter?	Track process and report to RWA Board	Woodling, Bezerra
Bay-Delta Conservation Plan	BDCP Recirculated EIR	Coordination and information dissemination	Sac Valley Water Users, NCWA	Regional coordination on BDCP positions and comments			Track process and report to RWA Board	Woodling, Bezerra
	Reclamation BDCP Participation	Coordination and information dissemination	Non-BDCP Contractors	CVP operations that preserve water supplies of RWA members.	--		Track process. Attend periodic meetings.	Woodling, Bezerra
	Conservation Measure 19 - Stormwater	Coordination and information dissemination	Cities, Counties	No requirements on RWA members to implement BDCP actions.	--		Track process and report to RWA Board. Intervene as required.	Peifer, McKinney
Bay Delta Water Quality Control Plan	Phase 2 – Sacramento Valley	Coordination and information dissemination	Sac Valley Water Users	Delta and tributary flow requirements that provide for reliable surface water supplies for RWA members.	--		Track process and report to RWA Board. Intervene as required.	Woodling, Bezerra
SWRCB Tributary Flows on Priority Streams		Coordination and information dissemination	Water Forum	Implementation of LAR Flow Standard as alternative for American River flows.		RWA support of Flow Standard		Woodling
Delta Plan	Implementation	Coordination and information dissemination	Sacramento County, City of Sacramento, West Sacramento	No negative impacts of DSC actions to RWA members	--		Track process and report to RWA Board. Intervene as required.	Woodling, Schmitz, Peifer

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

2015 Urban Water Management Plans	UWMP Submittal	Coordination and information dissemination. Regional GPCD reporting.	RWA members	Ensure compliance with content and deadline of UWMP submittal. Maintain grant eligibility.	Create regional baseline and target for 20x2020 compliance. Create template for UWMP to include regional compliance.	Collect data from RWA members to calculate regional baseline gpcd and 2015, 2020 targets.	Talbot
	Regional Water Shortage Stages	Lead development of common actions	RWA members, SACOG jurisdictions	Better inform public of drought conditions and actions	Guidance document on stages and associated actions.	Workshop Finalize document Outreach to agencies, SACOG	Talbot
Hexavalent Chromium MCL	Implementation	Coordination and information	Affected RWA members, ACWA	Ensure adequate compliance period	--	Track legislation, regulations.	Swartz, Roscoe, Henrici
	Funding	Coordination and support of grant funding	Affected RWA members	Cost share funding for treatment facilities.	--	Identify funding opportunities and support affected water systems.	Swartz
Reclamation	Sacramento-San Joaquin Basin Study	Coordination and information dissemination.		Promote needed infrastructure and operations for region.	Comments on draft study	Track process and coordinate comments.	Maisch, Woodling, Lorange, McKinney, Peifer, Swartz
	M&I Shortage Policy	Coordination and information dissemination.	RWA members with CVP contracts	Preserve water supplies of RWA members.	--	Track process and report to RWA Board. Intervene as required.	Bezerra
	Coordinated	Coordination		Enhance		Track process and	Bezerra

DRAFT - RWA Government Affairs Program – 2014-15 Work Plan

	Operating Agreement Negotiations	and information dissemination.		reliability of water supplies of RWA members.	--	report to RWA Board. Intervene as required.	
Term 14	Coordination and information dissemination.	RWA members with CVP contracts	Preserve water supplies of RWA members.	--	Track process and report to RWA Board. Intervene as required.	<i>Bezerra</i>	

EXHIBIT 2

House Natural Resources:

- Chairman: Rob Bishop (R-UT)
- Ranking Member: Raúl Grijalva (D-AZ)
- California Members:
 - Tom McClintock (R-4)
 - Doug LaMalfa (R-1)
 - Jeff Denham (R-10)
 - Paul Cook (R-8)
 - Grace Napolitano (D-32)
 - Jim Costa (D-16)
 - Jared Huffman (D-2)
 - Raul Ruiz (D-36)
 - Alan Lowenthal (D-47)
 - Norma Torres (D-35)
- Subcommittee on Water, Power and Oceans:
 - Chairman: John Fleming (R-LA)
 - Vice Chairman: Paul Gosar (R-AZ)
 - Ranking Member: Jared Huffman (D-CA)
 - California Members:
 - Tom McClintock
 - Doug LaMalfa
 - Jeff Denham
 - Grace Napolitano
 - Jim Costa
 - Raul Ruiz
 - Alan Lowenthal
 - Norma Torres

House Transportation and Infrastructure:

- Chairman: Bill Shuster (R-PA)
- Ranking Member: Peter DeFazio (D-OR)
- California Members:
 - Duncan Hunter (R-50)
 - Jeff Denham (R-10)
 - Mimi Walters (R-45)
 - Grace Napolitano (D-32)
 - John Garamendi (D-3)
 - Janice Hahn (D-44)
 - Jared Huffman (D-2)
 - Julia Brownley (D-26)
- Subcommittee on Water Resources and Environment:
 - Chairman: Bob Gibbs (R-OH)
 - Ranking Member: Grace Napolitano

- California Members:
 - Duncan Hunter
 - Jeff Denham
 - John Garamendi
 - Jared Huffman

House Energy and Commerce:

- Chairman: Fred Upton (R-MI)
- Ranking Member: Frank Pallone (D-NJ)
- California Members:
 - Anna Eshoo (D-18)
 - Lois Capps (D-24)
 - Doris Matsui (D-6)
 - Jerry McNerney (D-9)
 - Tony Cardenas (D-29)

House Agriculture:

- Chairman: K. Michael Conaway (R-TX)
- Vice Chairman: Randy Neugebauer (R-TX)
- Vice Chairman: Bob Goodlatte (R-VA)
- Ranking Member: Collin Peterson (D-MN)
- California Members:
 - Jeff Denham (R-10)
 - Doug LaMalfa (R-1)
 - Jim Costa (D-16)
 - Pete Aguilar (D-31)

Senate Environment and Public Works:

- Chairman: Jim Inhofe (R-OK)
- Ranking Member: Barbara Boxer (D-CA)

Senate Energy and Natural Resources:

- Chairwoman: Lisa Murkowski (R-AK)
- Ranking Member: Maria Cantwell (D-WA)

Senate Energy and Water Appropriations:

- Chairman: Lamar Alexander (R-TN)
- Ranking Member: Dianne Feinstein (D-CA)



Government Affairs Committee

Agenda Item: 3

Date: January 29, 2015

Subject: Hexavalent Chromium 6

Staff Contact: Dan York, Assistant General Manager

On April 15, 2014, the State Water Resources Control Board, formerly the California Department of Public Health, submitted to the Office of Administrative Law (OAL) its final proposed regulation establishing the first ever drinking water maximum contaminant level (MCL) for Hexavalent Chromium (HC) at 10 parts per billion (ppb). The final proposed regulation was approved by the OAL in compliance with the Administrative Procedures Act and filed with the Secretary of State. Implementation of this new drinking water standard for HC began on July 1, 2014.

In anticipation of this new regulation, water purveyors statewide, including Sacramento Suburban Water District (District), began analyzing groundwater sources for HC. This new wave of data has allowed water purveyors, as well as regional authorities such as the Sacramento Groundwater Authority (SGA), to gain a better understanding of the concentrations of HC in groundwater throughout the area. Results from samples analyzed in November 2013 and April 2014 indicate the HC concentration in the majority of the District wells is less than 5.0 ppb. However, eighteen District wells had concentrations between 5.0 ppb and 8.5 ppb, and seven wells exceeded the new MCL of 10 ppb.

A neighboring water district, Rio Linda/Elverta Community Water District (RLECWD), has a large percentage of their supply wells that exceed the new MCL for HC. As a result, RLECWD recently contracted with Wood Rodgers to conduct a study of the occurrence of Hexavalent Chromium in Northern Sacramento County. The scope of work included a review of well data and hydrogeologic reports, an assessment of water quality, and the identification of potential new well sites. During this study, Wood Rodgers discovered that approximately 425 RLECWD customers have backflow devices on their services as a result of actively using private domestic wells as part of their water supply. They also noted an increase in the HC concentration in wells that are in close proximity to the former McClellan Air Force Base (McClellan). These findings were reported to the SGA by Wood Rodgers.

On November 14, 2014, a letter was sent to the Central Valley Regional Water Control Board from Regional Water Authority, on behalf of the SGA, to express concern over the presence of

elevated levels of HC in groundwater in and around the McClellan (see Exhibit 1). The concern is focused on the fact that previous studies and corrective planning were based on a standard of 50 ppb. With the implementation of the new standard MCL for HC at 10 ppb, these initial studies and plans for remediation might very well be outdated and no longer relevant. More importantly, HC data from 215 public supply wells in the Sacramento basin over the past 13 years shows elevated levels of HC in and around McClellan when compared to the average concentration (5.2 ppb) of wells outside of this area. The concern of SGA is that these higher concentrations may not be naturally-occurring, but a result of past activities at McClellan.

It is well known that historical activities at McClellan have resulted in contamination of the groundwater sources in the area. Efforts to remediate this contamination included extraction and treatment of the groundwater to remove volatile organic compounds. The water pumped from the ground during this extraction and treatment process has been discharged into Magpie Creek in exceedance of the new MCL for HC for a number of years. It should be noted that all 7 District wells with HC concentrations above the MCL are in close proximity to McClellan (see Exhibit 2).

Mr. Woodling closes the letter with a request for a timely evaluation of the extent of HC in and around McClellan citing concern about the protection of public health in the region, and noting that a great number of public supply wells, and many other domestic wells not regulated under the current MCL, could be affected.

The Central Valley Regional Water Control Board issued a letter (see Exhibit 3), dated December 9, 2014, stating they communicated their concerns to the Air Force in comments in the McClellan Five-Year Report that was completed prior to the rule making process of HC. However, the Air Force will update the human health risk assessment and conduct an evaluation and report findings by fall of 2015.

Staff will continue to coordinate with SGA and regulatory agencies involved with the groundwater cleanup activities at McClellan.

Strategic Plan Alignment

1. Water Supply (D) – Manage the District’s water supplies to ensure their quality and quantity.

Exhibit 1

5620 Birdcage Street, Suite 180
Citrus Heights, CA 95610

Tel: (916) 967-7692
Fax: (916) 967-7322
www.sgah2o.org



Sacramento Groundwater Authority
*Managing Groundwater Resources
in Northern Sacramento County*

November 14, 2014

California American
Water

Carmichael
Water District

Citrus Heights
Water District

City of Folsom

City of Sacramento

County of Sacramento

Del Paso Manor
Water District

Fair Oaks Water District

Golden State
Water Company

Natomas Central Mutual
Water Company

Orange Vale
Water Company

Rio Linda / Elverta
Community Water
District

Sacramento Suburban
Water District

San Juan
Water District

Agricultural and
Self-Supplied
Representative

Mr. Duncan Austin
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

On behalf of the Sacramento Groundwater Authority (SGA), I am writing to express our concern over the presence of elevated hexavalent chromium in groundwater in and around the former McClellan Air Force Base (McClellan). SGA is a joint powers authority formed in 1998 to manage the groundwater basin underlying Sacramento County north of the American River. SGA members include all 14 organized water purveyors in northern Sacramento County. Groundwater comprises approximately 50 percent of the developed municipal supply for the more than 500,000 residents living within the SGA area, making this one of our most important natural resources in the region.

As you are aware, the maximum contaminant level (MCL) for public drinking water supply was established in California at 0.010-milligrams per liter (equivalent to 10 micrograms per liter, $\mu\text{g/L}$) effective July 1, 2014. It is our belief that this significant change requires additional evaluation of the presence of hexavalent chromium in the vicinity of McClellan. Previous investigations and remedial planning were based on a standard for total chromium (50 $\mu\text{g/L}$). It is unclear as to whether the March 2007 Site Inspection (SI) Findings Report and Remedial Investigation (RI) Work Plan for non-VOCs in Groundwater (McClellan Administrative Record #6415) adequately assessed whether hexavalent chromium associated with McClellan could continue to be encountered outside of the former base, because the SI/RI was only required to display results of hexavalent chromium down to 21 $\mu\text{g/L}$.

In addition to the very high concentrations of hexavalent chromium associated with the former McClellan plating shops, the SI/RI shows high concentrations on the west side of McClellan in Zone A at 100 $\mu\text{g/L}$ in MW-355 (SI/RI Plate 6.1A) and in Zone B at 60 $\mu\text{g/L}$ in MW-105 (SI/RI Plate 6.1B). These concentrations and their proximity to public supply wells and many domestic wells require additional information and evaluation.

November 14, 2014
Letter to Mr. Duncan Austin
Page two of two

Hexavalent chromium is now required to be analyzed in all public wells, and we are gaining a better understanding of its occurrence in the region. Based on various sampling events between 2001 and 2014, we now have a record for 215 public supply wells in the basin. The average concentration is 5.2µg/L and the median concentration is 4.1µg/L. The spatial distribution of hexavalent chromium concentrations is shown on the attached regional map showing results from public supply wells in northern Sacramento County. Based on the geographic distribution of wells exceeding the MCL and the relatively low median and average concentrations of hexavalent chromium in other parts of the SGA area, we are concerned that these elevated concentrations are not naturally-occurring in the basin.

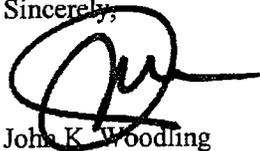
During a recent evaluation by Rio Linda/Elverta Community Water District (RLECWD) to identify potential impacts associated with additional groundwater pumping to supply new growth areas, RLECWD identified a number of private domestic wells still potentially operating to the north and west of McClellan (attached). RLECWD has 498 backflow prevention devices on customer services. They estimate that about 85 percent of those backflow devices are associated with customers that are also actively using domestic wells as part of their supply.

We are very concerned with the protection of health in our region. A large number of public supply wells are potentially impacted, as well as many domestic wells that are not currently regulated under the MCL. We believe that the anomalous distribution in the vicinity of McClellan, along with the high concentrations in monitoring wells near the McClellan boundary, requires additional information and evaluation of the potential for an anthropogenic source associated with past activities at McClellan.

We urge a timely response to more fully evaluating the extent of hexavalent chromium within and particularly outside the boundary of McClellan, based on the newly promulgated standard for hexavalent chromium.

We would be more than happy to meet at your earliest convenience, if you would like to discuss our concerns further.

Sincerely,

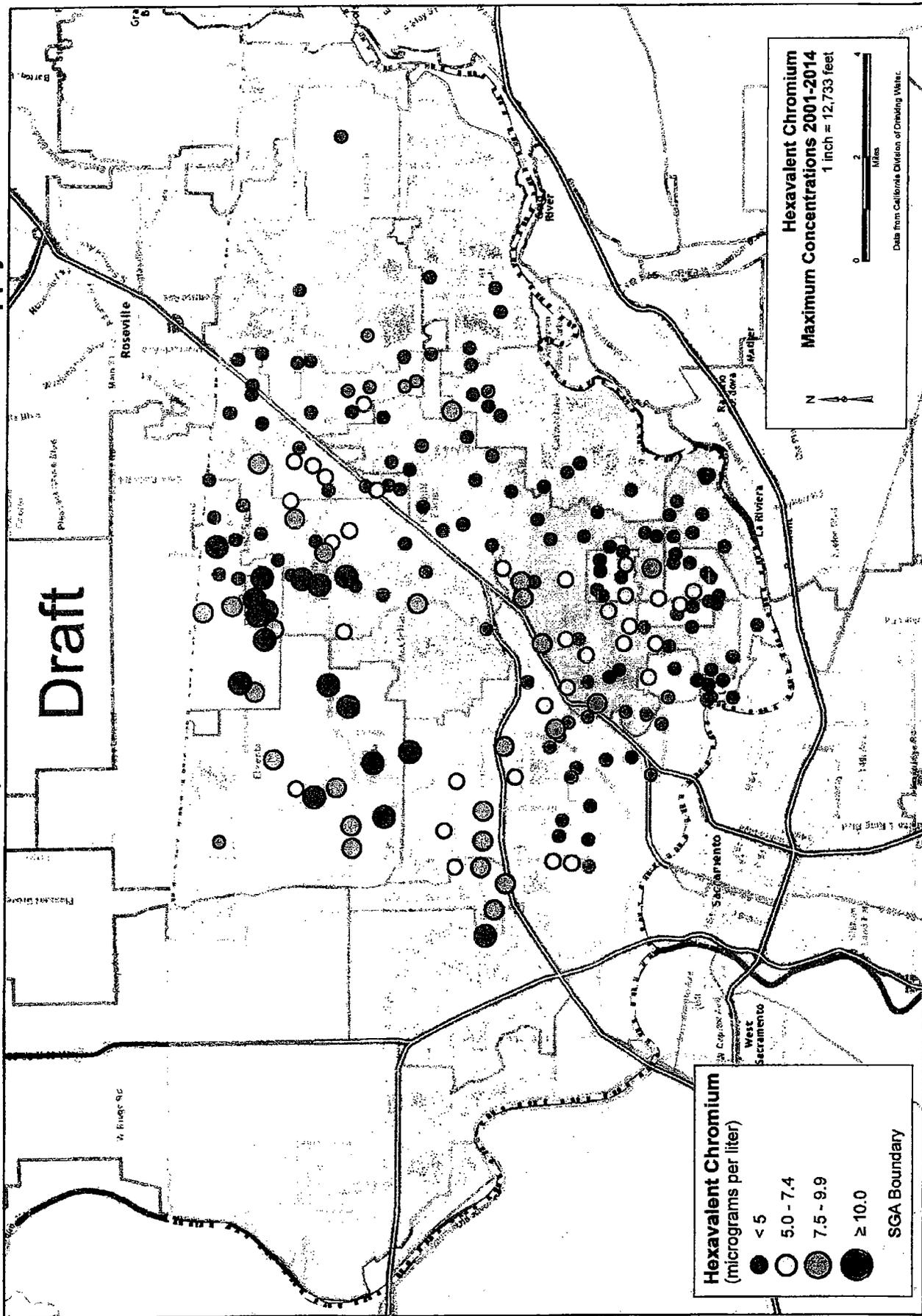


John K. Woodling

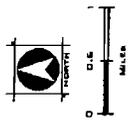
cc: Steven K. Mayer

North Sacramento County Hexavalent Chromium in Public Supply Wells

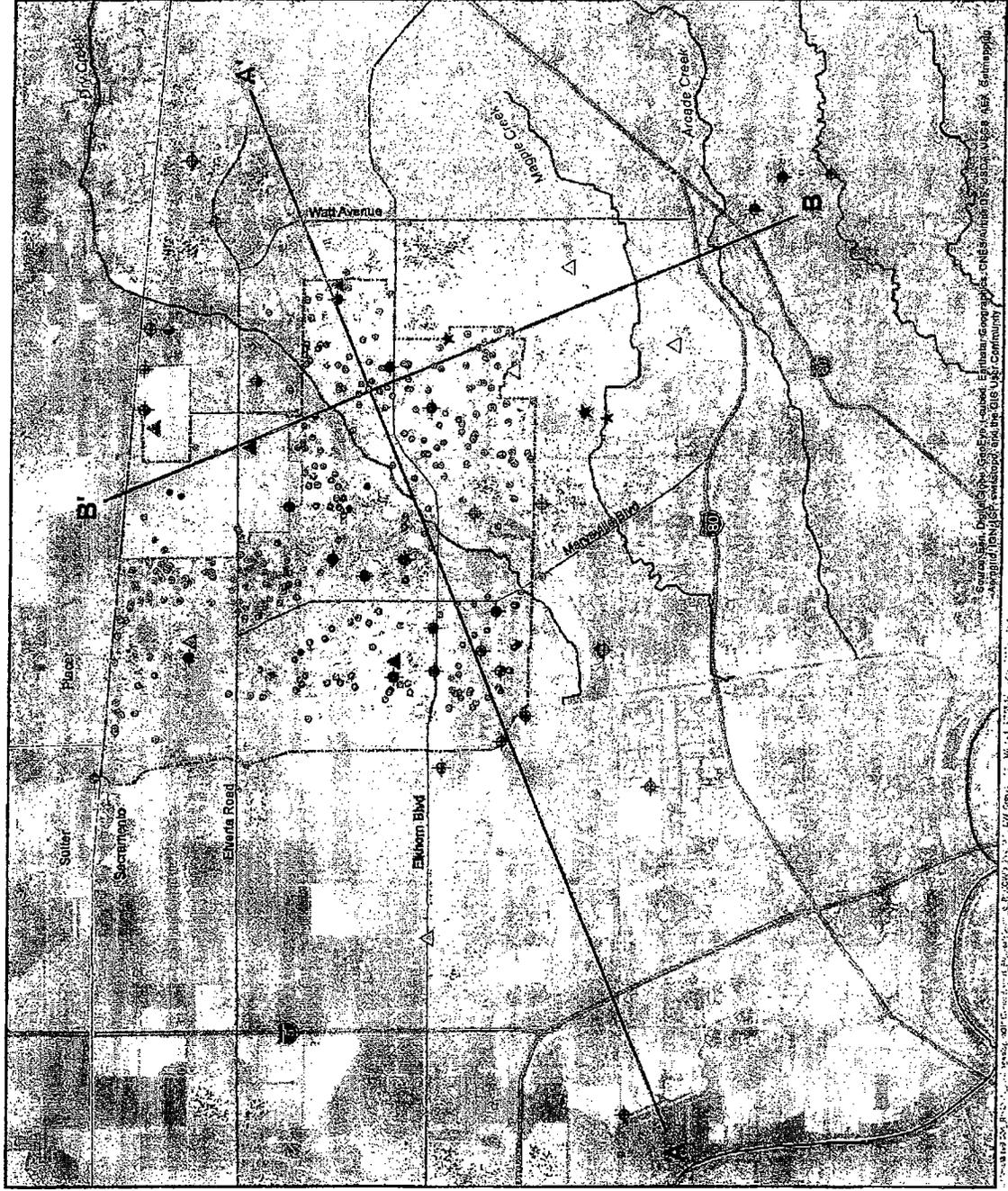
Draft



DRAFT
CROSS SECTION LOCATION MAP
RIO LINDA/EIVERTA COMMUNITY WATER DISTRICT
RIO LINDA, CALIFORNIA
NOVEMBER, 2014



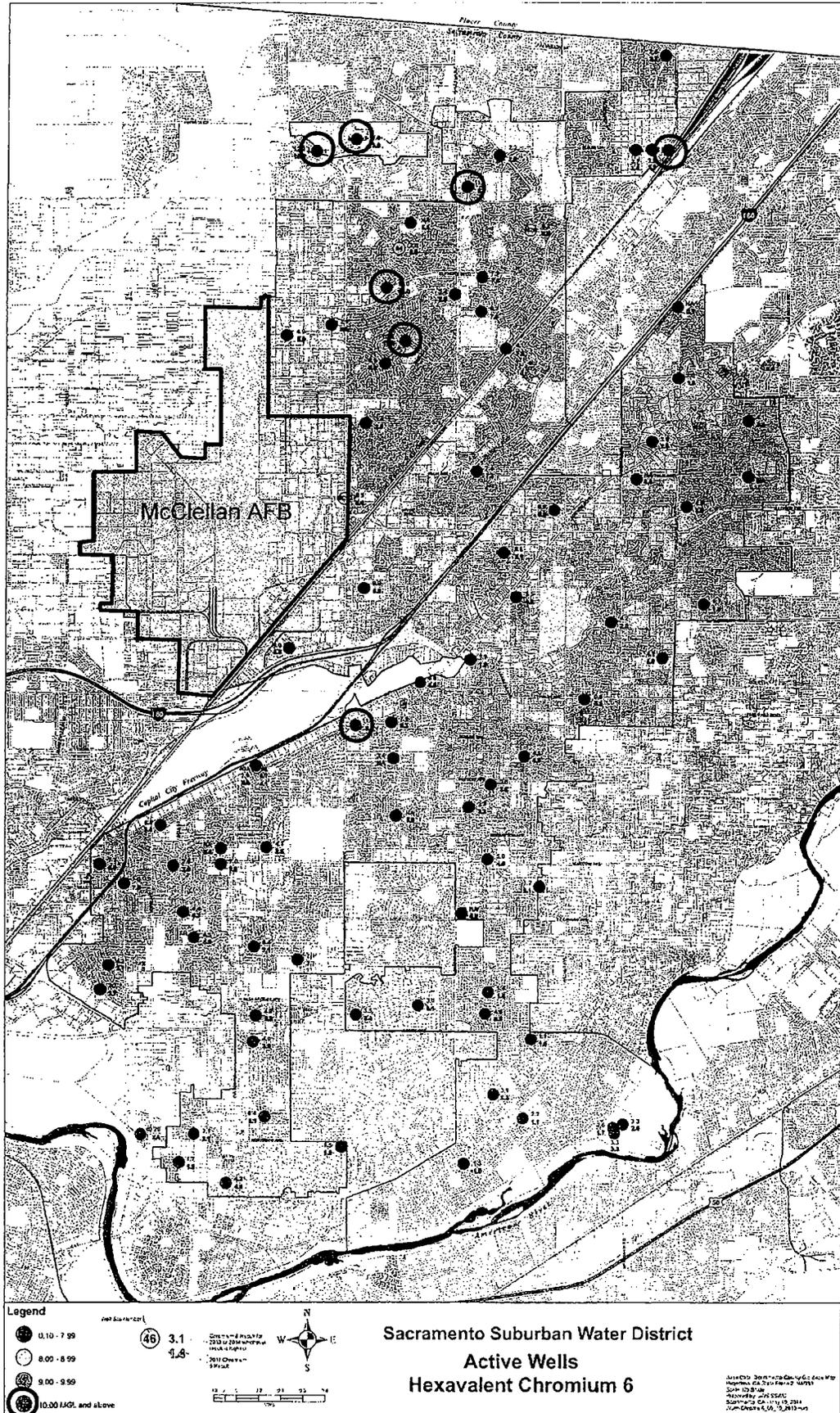
- Legend**
- Rio Linda/Eiverta Community Water District Boundary
 - - - Eiverta Specific Plan Cross Section Line
 - Production Wells**
 - ◆ Rio Linda/Eiverta Community Water District
 - ◆ Other Agency Wells
 - Monitoring Wells**
 - ▲ Rio Linda/Eiverta Community Water District
 - ▲ Sacramento Groundwater Authority
 - ▲ River West Investment
 - ▲ McClellan Air Force Base
 - ▲ Department of Water Resources
 - Other Wells**
 - ◆ Irrigation Well
 - Domestic Well
 - Surface Water Site**
 - ★ Sampling Location



WOOD ROGERS

FIGURE 6

Exhibit 2



Sacramento Suburban Water District
Active Wells
Hexavalent Chromium 6

DATE: 08/11/09
DRAWN BY: J. B. WILSON
CHECKED BY: J. B. WILSON
DATE: 08/11/09
PROJECT: SACRAMENTO SUBURBAN WATER DISTRICT
WELL DATA



DEC 11 2014

EDMUND G. BROWN JR.
GOVERNORMATTHEW RODRIGUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

9 December 2014

Mr. John K. Woodling
Sacramento Groundwater Authority
5620 Birdcage Street, Suite 180
Citrus Heights, CA 95610

HEXAVALENT CHROMIUM IN GROUNDWATER IN VICINITY OF FORMER McCLELLAN AIR FORCE BASE, SACRAMENTO COUNTY

Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff has reviewed your letter dated 14 November 2014 regarding the Sacramento Groundwater Authority's (SGA) concern with elevated hexavalent chromium in groundwater in the vicinity of the former McClellan Air Force Base (McClellan). As noted in your letter, the maximum contaminant level (MCL) for hexavalent chromium in public drinking water supply was established in California at 10 micrograms per liter (ug/L) effective 1 July 2014. The concern stated in your letter is that the significant change in the MCL for hexavalent chromium from 50 ug/L to 10 ug/L requires additional evaluation of the presence of hexavalent chromium in the vicinity of McClellan. Your letter also expresses the concern that the anomalous distribution of hexavalent chromium in the vicinity of McClellan, along with the high concentrations in monitoring wells near the McClellan boundary, requires additional information and evaluation of the potential for an anthropogenic source associated with past activities at McClellan.

In response, staff at the Central Valley Water Board share your concerns and have communicated our concerns to the Air Force in comments on the recently published McClellan Five-Year Review Report¹. The five-year review was conducted for the time period 1 July 2008 through 30 June 2013. The new MCL for hexavalent chromium became effective 1 July 2014. As noted in our comments on the Five-Year Review Report and as stated in the Final Non-Volatile Organic Compound (Non-VOC) Amendment to the Basewide VOC Groundwater Record of Decision² (ROD), *"The Air Force will update the human health risk assessment for hexavalent chromium or 1,4-dioxane and evaluate the protectiveness of the remedy in the next five-year review, which will be accelerated if necessary to take prompt action on a threat to human health and the environment."*

The Air Force responses to our concerns are as follows: *"The rule making process was not complete as of the cutoff date (June 30, 2013) for data and information to be included in this five-year review. The Air Force acknowledges the rule making process is complete and the hexavalent chromium MCL has changed. In accordance with the Non-VOC ROD Amendment (AFRPA, 2009 AR#7055) and the OSWER No. 9355.7 03B P Five-Year Review Guidance (USEPA, June 2001) the Air Force will update the human health risk assessment and conduct*

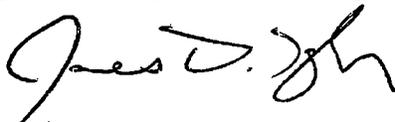
KARL E. LONGLEY SCD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

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an evaluation of the protectiveness of the remedy. Footnote 1 on page 2-14 of the Non-VOC ROD Amendment describes the requirements for evaluating protectiveness found in OSWER Five-Year Review Guidance. The Air Force will present the updated risk assessment and protectiveness determination in a stand-alone document, separate from this Five-Year Review, as soon as funding is available and a contractor can be procured."

Central Valley Water Board anticipates receiving the Air Force's protectiveness evaluation, addressing the change in the in the hexavalent chromium MCL, in the spring of 2015. In the meantime, the Air Force continues to operate and monitor approximately 95 extraction wells, 541 monitoring wells, and 95 piezometers. There are currently no lines of evidence, from the McClellan monitoring program, that concentrations greater than the ROD cleanup levels of VOCs or Non-VOCs in groundwater resulting from past Air Force operations are migrating beyond the capture zones of the operating groundwater extraction wells. Based on our current knowledge of hexavalent chromium in groundwater at McClellan, the concentrations of hexavalent chromium greater than the MCL in the supply wells north, northeast, and west of McClellan, as presented in the attachment to your letter, are unrelated to the McClellan site.

If you have any questions, please contact me at (916) 464-4669 or email me at james.taylor@waterboards.ca.gov.



JAMES D. TAYLOR, P.G.
Senior Engineering Geologist (Spec)
Federal Facilities Unit

cc: Mr. Steve Mayer, AFCEC/CIBW, McClellan, CA
Mr. Charnjit Bhullar, U.S. Environmental Protection Agency, San Francisco, CA
Mr. Stephen Pay, Department of Toxic Substances Control, Sacramento, CA

REFERENCES

¹MWH Americas, Inc. (MWH). 2014. *Five-Year Review Report, Former McClellan Air Force Base*, Final. Prepared for AFCEE/McClellan. September

²AFRPA. 2009. *Non-VOC Amendment to the Basewide VOC Groundwater Record of Decision*. Final. September. AR#7055



Government Affairs Committee

Agenda Item: 4

Date: January 29, 2015

Subject: Statewide National Pollutant Discharge Elimination System (NPDES) Discharge Permit

Staff Contact: Dan York, Assistant General Manager

On November 18, 2014, the State Water Resources Control Board (SWRCB) adopted the new (General Order) Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Drinking Water System Discharges to Waters of the United States. That action resulted from a grass roots effort that began over four years ago by staff from the Sacramento Suburban Water District (District) which soon was joined by staff at San Juan Water District and other local and other area water purveyors. Those stake holders came together with the intent of working collectively with SWRCB and Central Valley Regional Water Quality Control Board (CVRWQCB) staff to develop a General Order NPDES Permit specifically for water purveyors that considered federal and state regulatory requirements for public water systems.

Historically, many Sacramento area water purveyors have struggled to comply with the waste discharge requirements of their existing NPDES permit (Waste Discharge Requirements for Dewatering and Other Low-Threat Discharges to Surface Waters). Both CVRWQCB staff and Sacramento area water purveyors recognized the inability of the Low-Threat Permit to accommodate specific discharges made by water purveyors to maintain system reliability and public health and safety in accordance with state and federal law.

Existing Low-Threat NPDES Permit Waste Discharge Requirements (WDRs) vary widely amongst Sacramento area public water systems. This variability results from the inherent regulatory conflict cited above and the level of operational detail provided in permit applications. The new NPDES Permit for Drinking Water Systems accommodates discharges by public water systems that are associated with regulatory requirements, maintenance and unplanned emergencies.

The new NPDES Permit for Drinking Water Systems becomes effective 100 days after SWRCB adoption (February 26, 2015), and expires February 25, 2020. All public water systems in California that discharge to waters of the U.S. must apply for coverage under the new NPDES permit between February 26, 2015 and September 1, 2015, unless they meet one or more of the following exceptions:

- The public water system has less than 1,000 service connections
- Public water systems that are municipal separate storm sewer system (MS4) permit holders or, discharge to a MS4 system under a formal agreement with a MS4 permit holder.
- Public water systems with discharges that are covered by site-specific NPDES permits
- Public water systems with discharges outside the scope of the new permit or that may impair a local water body

None of the above exceptions pertain to the overall operation of the District. The new General Order NPDES Permit for Drinking Water Systems is now available on the SWRCB website. The SWRCB board members directed their staff to coordinate with industry associations to develop and implement a plan for outreach to water systems. On a regional effort, the following workshops for the new NPDES Permit for Drinking Water Systems are being held:

February 3, 2015 - Solano Irrigation District and CA-NV AWWA

February 19, 2015 - SA WWA (utilizing the District's Antelope facility)

Independent of when that document is released, District management staff has assembled a team that will begin gathering facility documents, determining specific monitoring requirements and, drafting operational procedures that will be included in the district's Notice of Intent (NOI) application. It is anticipated that compliance requirements under the new statewide permit will be less onerous than under the previous District specific NPDES permit.

Strategic Plan Alignment

1. Water Supply (A) – Protect public health and the environment through compliance with all applicable federal, state and local regulations.



Government Affairs Committee

Agenda Item: 5

Date: January 29, 2015

Subject: Development of Regulations to Implement the Sustainable Groundwater Management Act of 2014 (SGMA) and Potential 2015 Groundwater Legislation

Staff Contact: Dan York, Assistant General Manager

Following the passage of SB 1168 (Pavley), AB 1739 (Dickenson) and SB 1319 (Pavley), the three bill package that together make up the Sustainable Groundwater Management Act (SGMA) of 2014, the Association of California Water Agencies (ACWA) formed an Implementation Policy Group to advise on implementation issues as the statutes are interpreted in new state regulations. The ACWA group is expected to coordinate with the California Water Foundation, the Farm Bureau, the California State Association of Counties and other interested groups to prepare technical and policy papers to guide the implementation process. Exhibit 1 presents the timeframe of key dates now in statute. Exhibit 2 is a listing of the members of the ACWA SGMA Implementation Policy Group. SSWD General Manager Roscoe and John Sweigard of Merced Irrigation District represent ACWA Region 4. The group is expected to meet monthly as regulations are drafted, clean-up legislation is considered, and rules governing formation of new Groundwater Agencies are created.

Senator Pavley introduced a new bill, SB-13, in December 2014. This bill would provide a local agency or groundwater sustainability agency 90 or 180 days, as prescribed, to remedy certain deficiencies that caused the Board to designate the basin as a probationary basin. This bill would authorize the Board to develop an interim plan for certain probationary basins one year after the designation of the basin as a probationary basin. If the Board determines that all or part of a basin or sub-basin is not being monitored, the bill would require a determination whether there is sufficient interest in establishing a groundwater sustainability plan.

Strategic Plan Alignment

1. Water Supply (A) – Protect public health and the environment through compliance with all applicable federal, state and local regulations.

1. Water Supply (D) - Manage the District's water supplies to ensure their quality and quantity.

EXHIBIT 1

GW Legislation – Key Dates

January 1, 2015	Laws take effect
January 1, 2015	GW management plan under other parts of code cannot be adopted or renewed
January 1, 2015	GW sustainability plan may address undesirable results that occurred before this date
January 31, 2015	DWR identifies high, medium, low priority basins
January 1, 2016	DWR adopts regulations regarding revising basin boundaries
April 1, 2016	Adjudicated basins must submit to DWR the court judgment or decree
June 1, 2016	DWR adopts regulations for evaluation of GWSPs, implementation of plans, coordination agreements, and evaluation of alternative plans
December 31, 2016	DWR completes report on availability of water for replenishment
January 1, 2017	Deadline for DWR to update Bulletin 118 to identify basins subject to critical conditions of overdraft
January 1, 2017	Local agencies must submit an alternative plan if desired
January 1, 2017	DWR publishes best management practices for sustainable groundwater management
June 30, 2017	SWRCB may identify probationary basin on basis of failure to identify a sustainability agency
July 1, 2017	Extraction reporting required from anyone extracting in a probationary basin after this date
January 31, 2020	SWRCB may identify probationary basin on basis of failure to adopt a plan or finding that a plan is inadequate for basins identified as subject to critical conditions of overdraft
January 31, 2022	SWRCB may identify probationary basin on basis of failure to adopt a plan for basins not subject to critical conditions of overdraft
January 31, 2022	SWRCB may identify probationary basin on basis of finding that a plan is inadequate and in a condition of long term overdraft
January 31, 2025	SWRCB may identify probationary basin on basis of finding that groundwater extractions are causing significant depletions of surface water.
January 31, 2042	20 years to achieve sustainability goal...

EXHIBIT 2

ACWA Sustainable Groundwater Management Act (SGMA) Implementation Policy Group

Chair: Kathy Tiegs	ACWA Vice President	Region 9
Vice Chair: Thad Bettner	Glenn Colusa Irrigation District	Region 2
GW Committee: Greg Zlotnick	San Luis-Delta Mendota Water Authority	Region 6
Jim Barrett	Coachella Valley Water District	Region 9
Jill Duerig	Zone 7 Water Agency	Region 5
David Eggerton	El Dorado County Water Agency	Region 3
David Guy	Northern California Water Association	Region 2
Paul Hendrix	Tulare Irrigation District	Region 7
Matt Hurley	Angiola Water District	Region 6
Jay Jasperse	Sonoma County Water Agency	Region 1
Ken Manning	San Gabriel Basin WQA	Region 8
Mike Markus	Orange County Water District	Region 10
David Orth	Kings River Conservation District	Region 6
David Pettijohn	Los Angeles DWP	Region 8
Rob Roscoe	Sacramento-Suburban Water District	Region 4
John Sweigard	Merced Irrigation District/SJTA	Region 4
Bill Taube	Wheeler Ridge-Maricopa WSD	Region 7
Robb Whitaker	Water Replenishment District of SC	Region 8
Derrick Williams	Soquel Creek Water District	Region 5

Staff Liaison: Dave Bolland