

DEPARTMENT OF WATER RESOURCES WATER QUALITY POLICY AND IMPLEMENTATION PROCESS FOR ACCEPTANCE OF NON-PROJECT WATER INTO THE STATE WATER PROJECT

It is the Department of Water Resources (DWR) policy to assist with the conveyance of water to provide water supply, and to protect the State Water Project (SWP) water quality within the California Aqueduct. To facilitate this policy DWR provides the following implementation process for accepting non-project water into the SWP (Policy). For purposes of this document, SWP and California Aqueduct are interchangeable and the same.

POLICY PROVISIONS

DWR shall consider and evaluate all requests for Non-Project (NP) water input directly into the SWP conveyance facilities based upon the criteria established in this document. NP water shall be considered to be any water input into the SWP for conveyance by the SWP that is not directly diverted from the Sacramento-San Joaquin Delta or natural inflow into SWP reservoirs.

The proponent of any NP water input proposal shall demonstrate that the water is of consistent, predictable, and acceptable quality.

DWR will consult with State Water Project (Contractors), existing NP participants and the Department of Public Health (DPH) on drinking water quality issues relating to NP water as needed to assure the protection of SWP water quality.

Nothing in this document shall be construed as authorizing the objectives of Article 19 of the SWP water supply contracts or DPH drinking water maximum contaminant levels to be exceeded.

This Policy shall not constrain the ability of DWR to operate the SWP for its intended purposes and shall not adversely impact SWP water deliveries, operation or facilities.

EVALUATING NP WATER PROPOSALS

DWR shall use a two-tiered approach for evaluating NP water for input into the California Aqueduct.

NP Tier 1

Tier 1 NP pump-in proposals (PIP) shall exhibit water quality that is essentially the same, or better, than what occurs in the California Aqueduct. PIP's considered to be tier 1 shall be approved by DWR (see baseline water quality tables 1 through 4).

NP Tier 2

Tier 2 PIP's are those that exhibit water quality that is different and possibly worse than in the California Aqueduct and/or have the potential to cause adverse impacts to the Contractors. Tier 2 PIP's shall be referred to a NP Facilitation Group (FG), which would review the project and if needed make recommendations to DWR in consideration of the PIP.

SWC Facilitation Group

This advisory group consists of representatives from each Contractor that chooses to participate and DWR. The group shall review tier 2 PIP's based on the merits, impacts, mitigation, water quality monitoring, cost/benefits or other issues of each PIP and provide recommendations to DWR. Upon initial review of tier 2 PIP by DWR, it shall then be submitted to the FG for review. A consensus recommendation from the FG would be sought regarding approval of the PIP. DWR shall base its decision on the merits of the PIP, recommendations of the FG and the PIP's ability to provide overall benefits to the SWP and the State of California.

Blending Water Sources

Blending of multiple water sources prior to inflow into the SWP is acceptable and may be preferred depending upon water quality of the PIP. Blending of water in this manner may be used to qualify a project as NP Tier 1.

Mixing (blending) within the California aqueduct can be considered but shall not be adjacent to municipal and industrial (M&I) delivery locations. PIP's that are coordinating water discharged to maintain or improve SWP water quality are an example of the mixing approach. The PIP shall demonstrate by model or an approach acceptable to DWR and the FG that the water is adequately mixed before reaching the first M&I customer. Generally NP PIP's that involve mixing with SWP water shall be considered NP Tier 2.

Baseline Water Quality

To aid in developing and evaluating PIP's both historical and current SWP water quality levels shall be considered. A representative baseline water quality summary is shown in Tables 1 through 4, using historical SWP water quality records at O'Neill Forebay.

NP IMPLEMENTATION PROCESS

Project Proposals

The NP project proponent requesting to introduce water into the SWP shall submit a detailed PIP to DWR. The proponent shall demonstrate that the NP water is of

consistent, predictable and reliable quality, and is responsible for preparing and complying with any and all contracts, environmental documents, permits or licenses that are necessary consistent with applicable laws, regulations, agreements, procedures, or policies.

Project Description

The proponent will submit to DWR a PIP describing the proposed program, identifying the water source(s), planned operation, characterizing the inflow water quality and any anticipated impacts to SWP water quality and/or operations. The PIP should be submitted at least one month prior to proposed start up to allow for DWR and FG review. The PIP shall include:

- Project proponent names, locations, addresses, and contact person(s).
- Maps identifying all sources of water, point of inflow to the SWP and ultimate fate of the introduced water.
- Terms and conditions of inflow, timing, rates and volumes of inflow, pumping, conveyance and storage requirements.
- Construction details of any facilities located adjacent to the SWP including valves, meters, and pump and piping size.
- All potential impacts and/or benefits to downstream SWP water contractors.
- Detailed water quality data for all sources of water and any blend of sources that will be introduced into the SWP.
- Identify anticipated water quality changes within the SWP.
- Identify other relevant environmental issues such as subsidence, ground water overdraft or, presents of endangered species.
- Provide performance measures and remedial actions that will be taken in the event projected SWP water quality levels are not met.
- Reference an existing contract or indicate that one is in process with DWR to conduct a PIP.

Water Quality Monitoring

In order to demonstrate that the water source(s) are of consistent, predictable, and acceptable quality the NP proponent shall monitor water quality. The proponent shall, for the duration of the program, regularly report on operations as they affect water quality, monitoring data and water quality changes. Both DPH title 22 and a short list of Constituents of Concern (COC) shall be monitored for based upon one of the following water quality monitoring options.

Constituents of Concern Current COC are Arsenic, Bromide, Chloride, Nitrate, Sulfate, Organic Carbon, and Total Dissolved Solids. These COC's may be changed as needed.

Water Quality Monitoring Options NP proponents shall select one of the testing options below and perform all water quality testing and provide analytical results in

a timely manner as described herein. Monitoring shall be conducted for initial well start-up, periodic well re-testing and on-going testing during operation. Well data should be no more than three years old. Title 22 results should be provided to DWR and the FG within two weeks of testing and COC results within one week of testing, unless other schedules are agreed upon by DWR and the FG.

Option 1 - Baseline tests for Individual Wells

Well Start-up: Title 22 tests are required for all wells participating in the program prior to start-up. An existing title 22 test that is no more than three years old may be used. A Title 22 test may be substituted for any well near a similar well with a Title 22 test of record.

Well Re-testing: Title 22 test for all wells participating every three years.

Ongoing Monitoring: COC tests are required for all discharge locations to the SWP at start up and quarterly thereafter for new programs and resumption of established programs. New programs or those with constituents that may potentially degrade the SWP shall conduct at least weekly COC sampling of all discharge locations until the proponent demonstrates that the NP water is of consistent, predictable and reliable quality. Once the nature of the discharge has been clearly established, the COC tests are required quarterly for each discharge point.

Option 2 - Baseline tests for Representative Wells

Well Start-up: COC tests of record are required for all wells participating in the program and Title 22 tests of record are required for representative wells comprising a subset of all wells. This would typically be a group of wells that are manifold together and discharge to one pipe. Representative wells shall be identified on a case-by-case basis to be representative of the manifold area, well proximity, and water levels.

Well Re-testing: Same as required in Option 1.

On-going Monitoring: COC tests are required for all discharge locations to the SWP at start up and monthly thereafter for the duration of the program and annually at each well. New programs or those with constituents that may potentially degrade the SWP shall conduct weekly COC sampling of all discharge locations until the proponent demonstrates that the NP water is of consistent, predictable and reliable quality.

Option 3 – Self Directed

A PIP may propose a water quality monitoring program for approval by DWR and the FG that is different from options 1 or 2. It must include COC and title 22 testing

that will fully characterize water pumped into the SWP and be at an interval to show a consistent, predictable and reliable quality.

Analytical Methods

Analytical laboratories used by project proponents shall be DPH certified by the Environmental Laboratory Accreditation Program (ELAP) and use EPA prescribed and ELAP accredited methods for drinking water analysis. Minimum Reporting Levels must be at least as low as the DPH required detection limits for purposes of reporting (DLR). The current DLRs are listed on the DPH website at [Http://www.cdph.ca.gov/certlic/drinkingwater/Pages/MCLsandPHGs](http://www.cdph.ca.gov/certlic/drinkingwater/Pages/MCLsandPHGs). DWR shall continue to use Bryte Chemical Laboratory as it's analytical and reference lab.

Flow Measurements

The project proponent shall maintain current, accurate records of water production rate and volume from each source, as well as, each point of discharge into the SWP. All flow measurements shall be submitted to regularly to DWR.

RECONSIDERATION

If an NP proponent disagrees with the FG or DWR decision or feels that there is an overriding benefit of the proposal, the proponent may request reconsideration from DWR on the basis of overriding public benefit or water supply deficiency. DWR shall consider these requests on a case-by-case basis.

ONGOING PROGRAM

Any NP Proponent who has successfully established a NP water inflow program (Including existing Kern Fan Banking Projects, Kern Water Bank, Pioneer and Berrenda Mesa Projects, Semitropic Water Storage District Wheeler Ridge Mariposa Water Storage District and Arvin Edison Water Storage District) may reinitiate the program by notifying DWR at least ten days before inflow is scheduled to begin and provide the following information:

- Updated water quality data and/or updated modeling that adequately reflects the quality of water to be introduced into the SWP.
- Turn-in location.
- Expected rate and duration of inflow. DWR shall notify the FG of this reinitiating of inflow.
- Water quality monitoring schedule that meets the objective of this policy.

FUTURE NP PROGRAMS

Future NP projects should be planned and designed considering the following items:

- Projects involving water quality exceeding primary drinking water standards shall show that the water shall be treated or blended before it enters the SWP to prevent water quality impacts.
- The project proponent of a Tier 2 proposal should clearly identify and establish that water inflow shall be managed and operated such that poor quality water will be blended with better quality water so that SWP water quality will not be degraded upon acceptable levels as determined by the FG and DWR.
- If a significant water supply deficiency exists and it is recommended by the FG that raw water quality criteria be set aside to ensure adequate supply, such action shall be subject to approval by the DPH.
- The project proponent of a NP inflow program which degrades SWP water quality shall identify mitigation to downstream water contractors for water quality impacts associated with increased water supply or treatment costs.

DWR ROLE

DWR shall seek, as needed, DPH or SWC recommendations on changes or additions to this document governing the NP water quality projects. The FG shall review proposed changes or additions prior to implementation by DWR, as needed.

DWR and or the United States Bureau of Reclamation (for San Luis Canal inflow) shall have ultimate responsibility for approving the water quality of all NP inflow, as well as, the oversight of monitoring and tracking the water quality of operating programs. DWR shall also ensure that the proponents of the NP inflow program perform according to their proposals, and will take appropriate action in the event of non-conformance.

Project Proposal Review Process

Upon receipt of a proposal for PIP, DWR shall review it for adequacy. DWR shall consider all PIPs based upon these guidelines. Review shall take no more than one month after receiving a complete program proposal. If necessary, DWR will convene timely meetings with the FG during the review. At a minimum the review will include

- Examination of all documents and data for completeness of the PIP.
- Notification of the affected Field Divisions, and the FG has been received by DWR.
- Consideration by DWR of comments from all parties before the final decision.
- Upon completion of the review DWR will notify the proponent and FG of the acceptance of the PIP or explain the reason(s) for rejecting it.
- DWR may reconsider a decision on a PIP based upon a recommendation from the FG. Reconsideration by DWR will be on a case-by-case basis.

Periodic Review

DWR may schedule periodic reviews of each operating NP inflow with input from the FG. As part of the review, program proponents shall provide the following information:

- Summary of deliveries to the Aqueduct.
- Water quality monitoring results.
- Proposed changes in the program operation.

The review may result in changes in monitoring and testing required of the program proponent as a result of;

- New constituents being added to the EPA /DPH list of drinking water standards.
- Changes in the maximum contaminant levels for the EPA/DPH list of drinking water standards.
- Identification of new constituents of concern.
- Changes in the water quality provided by the program.
- Changes in constituent background levels in the California Aqueduct.

This procedure shall recognize emerging contaminants and/or those detrimental to agricultural viability as they are identified by the regulatory agencies and shall set appropriate standards for water introduction based upon ambient levels in the California Aqueduct or State Notification Levels. Emerging contaminants are those that may pose significant risk to public health, but as yet do not have an MCL. Currently the Office of Environmental Health Hazard Assessment and the DPH establish Public Health Goals and Notification Levels, respectively. These levels, though not regulated, do provide health-based guidance to water utilities and can require public notification if exceeded.

Water Quality Review

DWR shall track and periodically report to the FG on water quality monitoring results on the SWP from NP water inflow and make all water quality data available to the public upon request.

- DWR shall review analyze and maintain all records of water quality testing conducted by the proponent of the well(s), source(s) and discharge(s) into the SWP.
- DWR shall determine what additional water quality monitoring, if any, is necessary within the SWP to ensure adequate protection of SWP water quality. DWR shall conduct all water quality monitoring within the SWP.
- DWR may prepare periodic reports of NP projects.

On-site Surveillance

The appropriate Field Division within DWR will be responsible for review and approval of all construction activities within the SWP right-of-way. Plans showing the discharge system piping, valves, sampling point, meters and locations must be submitted and approved prior to any construction. In addition, the appropriate Field Division will be responsible for confirmation of all meter readings and water quality monitoring conducted by the proponent.

- Field division staff may visit, inspect, and calibrate meters and measure flow conditions at each source or point of inflow into the SWP.
- Flow meters, sampling ports and anti-siphon valves must be conveniently located near the SWP right-of-way.
- Field division staff may collect water samples at each source or point of discharge into the SWP.
- The appropriate Field Division shall conduct additional water quality monitoring within the SWP, if deemed necessary, to assure compliance with the NP Inflow Criteria.
- DWR shall monitor aqueduct water quality and analyze several “split samples” of the water at the point of introduction into the aqueduct to ensure consistent analytical results.

POLICY APPROVAL

Approval Recommended
Date _____

David V. Starks
Chief, Division of Operations and Maintenance
Department of Water Resources

Approved
Date _____

Carl A. Torgersen
Deputy Director State Water Project
Department of Water Resources

Table A1 HISTORICAL WATER QUALITY CONDITIONS 1988 TO 2011 AT O'NEILL FOREBAY OUTLET (mg/L)

Parameter	Mean	Min.	Max.	Std. Dev.
Aluminum	0.03	0.01	0.527	0.05
Antimony	0.002	0.001*	0.005	0.002
Arsenic	0.002	0.001	0.004	0.001
Barium	0.05	0.05	0.068	0.002
Beryllium	0.001*	0.001*	0.001*	0.000
Bromide	0.22	0.04	0.54	0.16
Cadmium	0.003	0.001	0.005	0.002
Chromium	0.004	0.001	0.011	0.002
Copper	0.004	0.001	0.028	0.003
Fluoride	0.1	0.1	0.5	0.1
Iron	0.037	0.005	0.416	0.050
Manganese	0.009	0.005	0.06	0.007
Mercury	0.001	0.0002	0.001	0.0004
Nickel	0.001	0.001	0.004	0.0005
Nitrate	2.9	0.2	8.1	1.6
Selenium	0.001	0.001	0.002	0.0001
Silver	0.003	0.001	0.005	0.002
Sulfate	42	14	99	15
Total Organic Carbon	4.0	0.8	12.6	1.6
Zinc	0.007	0.005	0.21	0.01

*These values represent reporting limits. Actual values would be lower

Table A2 O'Neill Forebay Outlet Total Dissolved Solids Criteria by Water Year Classification, 1988-2011 (mg/L)

Year Type	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Wet	227.2	262.5	295.4	228.9	213.8	231.2	184.4	226.5	181.5	171.4	195.7	157.3
Near Normal	317.9	324.7	351.7	295.4	268.1	302.7	270.0	285.1	230.1	211.9	170.9	202.6
Dry	286.4	319.6	370.0	362.0	344.2	305.2	240.4	278.2	307.3	234.8	269.0	336.6
Critical	256.6	312.9	372.9	367.0	361.0	335.0	307.1	291.8	335.1	325.7	339.4	328.8

* Year type is based on water year classification. Below normal and above normal year types have been combined into one designation called "near normal."

Table A3 O'Neill Forebay Outlet Bromide Criteria by Water Year Classification, 1988-2011 (mg/L)

Year Type	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Wet	0.19	0.24	0.28	0.13	0.10	0.12	0.12	0.17	0.12	0.12	0.13	0.10
Near Normal	0.31	0.31	0.34	0.21	0.15	0.15	0.18	0.22	0.15	0.15	0.14	0.19
Dry	0.25	0.29	0.35	0.35	0.24	0.20	0.17	0.24	0.27	0.13	0.29	0.41
Critical	0.26	0.28	0.32	0.37	0.33	0.27	0.22	0.22	0.28	0.28	0.32	0.37

* Year type is based on water year classification. Below normal and above normal year types have been combined into one designation called "near normal."

Table A4 O'Neill Forebay Outlet Total Organic Carbon Criteria by Water Year Classification, 1988-2011 (mg/L)

Year Type*	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Wet	2.8	2.9	3.9	5.2	4.8	3.8	3.9	3.4	3.1	3.2	3.1	2.7
Near Normal	3.7	4.1	4.0	7.0	6.3	5.6	4.7	4.4	4.0	3.3	3.3	3.4
Dry	3.0	3.0	4.0	5.7	4.8	5.7	4.5	3.6	3.7	2.9	2.9	2.7
Critical	2.8	3.1	3.3	4.9	6.0	5.7	4.7	4.0	3.8	3.9	4.0	3.5

* Year type is based on water year classification. Below normal and above normal year types have been combined into one designation called "near normal."