

Attachment 3C

Water Quality Regulatory Requirements for Recycled Water Use on Irrigated Agricultural Land and MRWPCA's Compliance with Water Recycling Requirements

With regard to nutrients in recycled water used for agricultural irrigation, the current Salinas Valley Reclamation Plant and Castroville Seawater Intrusion Project permits, Water Quality Control Board, Region 3, Orders 94-82 (Water Recycling Requirements) and 97-52 (Recycled Water User Requirements) (WDID#3270201001), include provisions that the use of recycled water shall be applied at a rate and in a manner not to exceed vegetative demand. SWRCB General Order WQ 2014-0090-DWQ and Draft General Order WQ-2015-xxxx to be adopted next year in place of WQ 2014-0090, contain more specific provisions related to use of recycled water and vegetative demand and how to implement the provisions, including fertilizer use. The RWQCB could, by letter, modify Orders 94-82 and/or 97-82 to elaborate on this objective, which captures SWRCB Order WQ 2014-0090-DWQ Specification B.2, Draft SWRCB Order WQ 2015-xxxx-DWQ Specification C.8, and NOI Section II.b.3 Operation and Management Plan, each of which is presented below.

SWRCB ORDER WQ 2014-0090-DWQ

Specification B.3. Application of recycled water to the use area shall be at an agronomic rate, and shall consider soil, climate, and plant demand. In addition, application of recycled water and use of fertilizers shall be at a rate that takes into consideration nutrient levels in recycled water and nutrient demand by plants. [Also included in the Draft 2015 General Order.]

Agronomic Rate is defined as: The rate of application of recycled water to plants necessary to satisfy the plants' evapotranspiration requirements, considering allowances for supplemental water (e.g., effective precipitation), irrigation distribution uniformity, and leaching requirement, thus minimizing the movement of nutrients below the plants' root zone.

2015 Draft General Order Specification C.8. The Administrator shall require Users to apply and/or use recycled water in accordance with the Uniform Statewide Recycling Criteria and to comply with this General Order, including requirements to apply only at agronomic rates and not cause unauthorized degradation, pollution, or nuisance. The Producer shall communicate to Users the nutrient levels in the recycled water.

Attachment A General Instructions for Filing an NOI

Section II Recycled Water Application

b.3. Operation and management plan specifying agronomic rate(s) and nutrient application for the use area(s) and a set of reasonably practicable measures to ensure compliance with this General Order. This may include a water and nutrient budget for use area(s), site supervisor training, periodic inspections, or other appropriate measures. This requirement does not apply to the extent Users are subject to WDRs, waivers of WDRs, or conditional prohibitions regulating agricultural discharges from irrigated lands. [Also, included the in 2015 Draft General Order.]

MRWPCA monitors and enforces these provisions in compliance with their permit and has not had any violations of permit conditions. Therefore, MRWPCA is meeting the intent of the States regulations in conformance with the State program and approach for protecting water quality when using recycled water for agricultural irrigation.