

### **Pollution Prevention Overview**

- This chapter was reinterpreted, looking at it from a non-point source (NPS) v. point source perspective. Water quality was considered for total beneficial use, beyond drinking water alone. The chapter discusses the status of pollution prevention, the distinction between point source and NPS, and the different agencies and authorities.
- In writing the strategies, don't want to limit what can or can't be said from a particular agency perspective. This is about statewide strategy and looking at where there are places that we might want to push, improve, or fix. Laying out the current approach for water quality is important, don't want to limit that. New directions will be the content for issues and recommendations.
- To help set the *context*, it might be good to have a section that water quality management strategies relate to overall protection and remediation of water quality. This came up in flood workshop yesterday. In looking at various strategies, need to have a context first.
- Will want to update references where possible.

### **Status of Pollution Prevention in California**

- Keep the title, but mention that the emphasis on NPS. Point to the fact that we are dealing with a changing situation in that water quality problems and the program is changing.
- Clean beaches perhaps doesn't belong here; however, it does provide a nexus between point source and non-point sources.
- There is an interagency coordinating committee for non-point source.
- Move *groundwater quality* up to follow surface water quality. Will this be addressed in other RMSs? Point to other agencies and programs, such as well-head protection. Groundwater pollution prevention links to RMSs of resource area protection and groundwater remediation. Perhaps also urban runoff management.
- The land use categories have tight connections to other RMSs. For example, clean beaches (good opportunity to link with water-dependent recreation), ag, urban, marinas, hydromodification (links to system reoperation and flood); wetlands; forestry (new forest management RMS).
- Almost all of the strategies are linked here. Ag stewardship doesn't have link to water quality. Not sure how those linkages ought to occur, but don't want strategies that talk about everything.
- Each RMS should highlight the key linkages to other RMS. Linkages don't need to be completely comprehensive, can point to other information. Rather the links should provide a roadmap for where they want to get to.
- This is the toolkit to respond to future situations. These are things that grant people will be looking at. RMS should highlight the areas that the State is looking at.
- It isn't clear about what actually happens on the ground with pollution prevention measure. Talk about types of pollution prevention *projects and programs*.
- Discuss other efforts relating to marinas, talk about DTSC and other agencies; identify key agencies and initiatives.
- Regarding management practices and land uses, think outside the regulatory boxes – say that Low Impact Development is good and describe how it works. This section could be beefed up. Readers might not have the understanding that experts do. Perhaps a box talking about what people are doing in terms of management practices, links to other information (e.g. database).
- Question: How do *BMPs* relate to NPS?  
Response: The NPS doesn't have a list of authorized BMPs, which involves an extensive review process and authorization by the State Board. Forest service rules are the only area where that has been done. The NPS program database can sort Management Practice – sorting through different types of practices that can be used to meet different objectives.  
Comment: Provide a link to the NPS database.

### **Benefits of Pollution Prevention**

- Need to add a section on benefits of Pollution Prevention, especially long-term and non-quantified costs. Include avoidance costs.
- Benefits of water quality are intimately linked to water supply.
- Describe what people will be able to achieve to help their situation.

### **Costs of Pollution Prevention**

- Describe costs to state and to dischargers.

### **Major Issues Facing Pollution Prevention**

- In this section, want to create a compelling argument that supports the recommendations.
- The climate change section is a great overview – perhaps move to other area. Keep the piece that zeros in on pollution prevention. Climate change is a big issue for water quality and supply. Energy costs have typically been about 1/3<sup>rd</sup> of operating costs for wastewater treatment.
- For emerging contaminants section, include discussion on impacts and costs.
- Failing septic tanks is a big issue
- Why is monitoring and assessment in the issues category? This is a good description of existing programs – suggest moving to the overview section.

substitutes/green chemistry

- What about substitution away from harmful substances (e.g. copper and anti-fouling chemicals). For some substitutes, it's more about pollution reduction – not strictly pollution prevention.
- But like with pesticides, some practices have to do with preventing item from entering the environment (buffer strips).
- Add in a discussion on green substitutes. If this is a document for planning 20, 30 years out – what is the mix of tools going to be using. The topic of green chemistry and substitution often relates to waste management and toxics. Where should that be dealt with? The concept is about more than water. Is green chemistry one of our companion plans?
- A text box or pullout can make those connections, without making this strategy about that.
- Salt management is another conceptual pullout. [Note: Is a separate RMS in Update 2009.
- The issue of emerging conditions contains three themes – might want to break into three issues: merging contaminants, fragmentation, diffuse nature of non-point source (is that a background topic?). This will help frame the recommendations.
- Where do we talk about *aging infrastructure*?  
Response: In the discussion of point and non-point sources, point source approaches are spread out through various strategies. Recycled municipal water ought to include aging infrastructure. Our goal is the highest use possible, looking at Orange County for drinking water sources.  
Comment: A lot of old treatment plants are serving communities that are not well to do. It's hard to fund improvements.
- NPS pollution comes from individual sources. The general population doesn't know about water quality issues. Homeowners need to be brought up to speed through greater education and outreach. Bring this into the overview AND identify as an issue.

**FACILITATOR ACTION ITEM:** Look at the human behavior equation, greater understanding of the impact of the individual; consider larger framework discussion on education, outreach, and awareness.

### **Recommendations Regarding Pollution Prevention**

- The topic of Marinas in the Delta, brings back enforcement issue. Don't see a recommendation for more enforcement.

Facilitation action item: Check with Lands Commission on this.

- Recommendation #1, correct the reference – DHS now DPH. Why was recommendation #1 not implemented from Update 2005? (This recommendation is not an ongoing program, shows potential contaminants about zones of wells.)
- Recommendation #2 (drinking water) needs to talk about the NPS component of organic carbons. This also links to RMSs of resource area protection and groundwater remediation.
- Regarding chemical substitutes and pollution prevention, might want to recommend interface with chemical manufacturers. Another management tool is incentives (tax, other) for things that would lower the costs of cleanup and monitoring.

Facilitator action item: Send a note to AC, and work with Lew to interface with other teams

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