

## SECTION 4

# Compliance and Monitoring Plan

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The proposed compliance and monitoring plan for the requested CMUD IBT certificate includes the following elements, which are described in the sections below:

1. IBT Calculation
2. Reporting

The details of monitoring and compliance will be specified in a Compliance and Monitoring Plan approved by DWR.

## 4.1 IBT Calculation

CMUD will calculate the daily IBT using a methodology developed in conjunction with DWR staff. The methodology is based on the guidance developed by DWR for estimating IBT amounts as part of the Local Water Supply Planning process. Table 4-1 provides an example of the calculations that will be submitted.

Consumptive use for each day is assumed to be the difference between total water use and total wastewater discharged, or zero if discharge is greater than potable water use. This may underestimate consumptive use in the winter months (when water use is typically lower than wastewater discharge), but the effect will be to slightly overestimate the resulting IBT amount. When discharge is greater than water use, the portion of raw water withdrawal that is discharged as wastewater in each basin is assumed to be proportional to the actual wastewater discharges in that basin. In effect, this is assuming that the same degree of inflow and infiltration occurs in the sewer system in each basin. These assumptions will not impact evaluation of compliance with the requested IBT certificate, since the maximum IBT is expected to occur in the summer.

The portion of consumptive use that occurs in the source basin will be estimated as the portion of the water service area in the source basin, and will be updated annually to reflect changes in the development of the service area.

**TABLE 4-1**  
Sample Daily Calculations for Interbasin Transfer<sup>1</sup>

Date	Withdrawal from Catawba Basin (mgd)	Consumptive Use (mgd)		Wastewater Discharged (mgd)		Total Return to Catawba Basin (mgd)	Interbasin Transfer (mgd)	IBT as % of Grandfathered Amount <sup>2</sup>
		Catawba Basin	Rocky River Basin	Catawba Basin	Rocky River Basin			
6/1	139.31	57.69	9.39	68.33	3.90	126.02	13.29	83%
6/2	150.65	66.04	10.75	70.35	3.50	136.39	14.25	89%
6/3	149.97	67.48	10.99	66.80	4.70	134.28	15.69	97%
6/4	110.61	32.50	5.29	68.72	4.10	101.22	9.39	58%
6/5	108.20	30.80	5.01	68.09	4.30	98.89	9.31	58%
6/6	104.81	22.28	3.63	74.48	4.42	96.76	8.05	50%
6/7	117.78	33.11	5.39	75.68	3.60	108.79	8.99	56%
6/8	122.77	40.52	6.60	71.45	4.20	111.97	10.80	67%
6/9	133.63	52.07	8.48	68.18	4.90	120.25	13.38	83%
6/10	142.47	60.23	9.80	67.34	5.10	127.57	14.90	93%
6/11	141.19	63.70	10.37	63.62	3.50	127.32	13.87	86%
6/12	144.77	68.49	11.15	60.53	4.60	129.02	15.75	98%
6/13	137.82	53.29	8.68	71.05	4.80	124.34	13.48	84%
6/14	135.65	49.45	8.05	74.95	3.20	124.40	11.25	70%
6/15	120.06	36.28	5.91	72.67	5.20	108.95	11.11	69%
6/16	123.38	42.51	6.92	68.24	5.70	110.75	12.62	78%
6/17	126.49	46.78	7.61	67.10	5.00	113.88	12.61	78%
6/18	126.76	48.79	7.94	64.83	5.20	113.62	13.14	82%
6/19	124.87	41.24	6.71	71.21	5.70	112.45	12.41	77%
6/20	124.43	43.90	7.15	67.88	5.50	111.78	12.65	79%
6/21	135.60	54.00	8.79	67.91	4.90	121.91	13.69	85%
6/22	134.81	51.81	8.43	68.87	5.70	120.68	14.13	88%
6/23	141.49	58.97	9.60	67.52	5.40	126.49	15.00	93%
6/24	142.61	61.75	10.05	65.20	5.60	126.95	15.65	97%
6/25	135.05	57.41	9.35	62.60	5.70	120.01	15.05	93%
6/26	142.37	60.52	9.85	66.29	5.70	126.81	15.55	97%
6/27	129.63	45.49	7.40	71.14	5.60	116.63	13.00	81%
6/28	120.53	35.80	5.83	72.70	6.20	108.50	12.03	75%
6/29	110.51	24.46	3.98	76.37	5.70	100.83	9.68	60%
6/30	111.10	28.33	4.61	72.86	5.30	101.19	9.91	62%
Minimum							8.05	50%
Maximum							15.75	98%
Average	129.64	47.86	7.79	69.10	4.90	116.95	12.69	79%

1. from June 2000

2. Percentage of daily IBT to permitted amount under grandfathered IBT of 16.1 mgd.

## 4.2 Reporting

At the end of each calendar year, the daily IBT calculations will be summarized in an annual report to DWR. The annual report will document the maximum day IBT amount for that year. The distribution of consumptive uses between the source and receiving basins will be reviewed and modified to reflect changes in the development of the service area. The Annual Report will also document compliance with any conditions, if applicable, that the EMC includes in the IBT certificate.

Once an annual report indicates that a daily maximum IBT has exceeded 80% of the IBT specified in the certificate, CMUD will begin monthly reporting to DWR during the next calendar year. At the end of each month, CMUD will report IBT calculations and document the maximum IBT that occurred during that month. CMUD will also continue to submit annual reports that review the distribution of consumptive uses between the source and receiving basins based on service area development in the previous year, and document compliance with any interbasin certificate conditions, if applicable.