COPPER CONTROLS (C.13)

C.13.c Vehicle Brake Pads

The MRP requires that Permittees report on legislation development and implementation status in Annual Reports during the permit term. Compliance is being achieved through continued participation in the Brake Pad Partnership (BPP) process to develop California legislation phasing out copper from certain automobile brake pads sold in California.

Appendix A12, an “Investor’s Circle Update” from Sustainable Conservation, provides a primer on the issue of copper from brake pad wear, the Brake Pad Partnership (BPP), and the control measure determined through the BPP to be the most appropriate for reducing copper emissions from brake pads: proposed legislation SB 346 (Kehoe) – Hazardous materials: motor vehicle brake friction materials. As described in the Update, SB 346 was introduced to the California legislature in early 2009 and, after passing out of the Senate and moving to the Assembly, was made a two-year bill in late June 2009.

In FY 2009-10, Permittees’ efforts focused on:

1. Researching and providing information to assist with bill language;
2. Helping the bill’s sponsors to further develop the bill language to address concerns raised by industry representatives from the auto and brake pad manufacturers, brake pad wholesalers and retailers, and car dealers; and
3. Advocating for passage of the bill by the Assembly Environmental Safety and Toxic Materials (Toxics) Committee.

The above activities were coordinated through the California Stormwater Quality Association (CASQA) BPP Team, a group of stormwater quality agencies affected by copper or metals listings, TMDLs, or permit requirements. Permittees participated in the process through BASMAA representation on the BPP team and supported SB346 with letters and lobbying efforts.

The language of SB 346 as of the end of FY 2009-10, two fact sheets on the bill, and BASMAA’s letter of strong support for SB 346 to the Assembly Toxics Committee are provided in Appendices A13, A14, A15, and A16, respectively.
Dedicated Decade: An Update on the Brake Pad Partnership

From the Bay to the boardroom, the lab to the Legislature, Sustainable Conservation's Brake Pad Partnership has come a long way since its inception over a decade ago. For years, the Partnership – an uncommon alliance of brake manufacturers, stormwater agencies and environmental groups – has worked tirelessly to identify and address the environmental consequences of copper from automobile brake pads. Beyond its specific project scope, the Partnership is a remarkable example of where Sustainable Conservation has been and where we're going.

COPPER 101

Each time drivers step on their brakes, small amounts of debris are released onto streets, into the air and, eventually, into waterways. No big deal, right? Wrong. California drivers hit their brakes hundreds of millions of times a day – which adds up to a substantial quantity of debris, much of which contains copper. Copper that ends up in streams, rivers and coastal waters is toxic to phytoplankton and disrupts the aquatic food chain. Elevated copper levels are also one of the factors contributing to the decline of salmon populations. What's worse, once copper has been deposited into water, it is extremely difficult – and extremely expensive – to get it out.

High levels of copper are found in urban watersheds across California. Through maximum allowable limits for copper pollution mandated by the State Water Resources Control Board, municipalities within these watersheds are now responsible for taking onerous and costly clean-up measures – and they have to demonstrate significant progress toward compliance by 2018.

Could brake pads be the culprit? Moreover, could they provide the key to an economically viable solution to the problem? Sustainable Conservation set out to investigate.

A COLLABORATIVE APPROACH

Instead of polarizing environmental and industry interests by heading straight to the courtroom, we convinced the various stakeholders to try a

“By banning the use of copper in vehicle brake pads, California has the opportunity to again lead the nation in protecting our environment.”

Senator Christine Kehoe (D-San Diego), author of Senate Bill (SB) 346
An Update on the Brake Pad Partnership

In 1996, Sustainable Conservation convened the Partnership to understand the impact of copper from brake pads on water quality. When joining the Partnership, industry representatives agreed that if science showed copper in brake pads was indeed a significant contributor to water quality degradation, they would voluntarily reduce copper in brake pad formulations.

**Pivotal Outcomes**
Over the years that followed, the Partnership conducted rigorous scientific studies to determine the role brake pads play in elevated copper levels within San Francisco Bay Area watersheds. The results of these studies indicate that copper from brake pads accounts for the majority of the human-generated copper in highly urbanized watersheds. With this news, the industry was ready to honor its commitment AND raise the stakes on behalf of the Golden State’s environmental and economic health.

**New Directions**
By recommending the introduction of state legislation to limit the amount of copper in brake pads, the industry helped steer the Partnership – and Sustainable Conservation – into the policy realm. This initially surprising recommendation ultimately makes great sense: legislation would address environmental and economic concerns by maximizing positive impact on water quality and guaranteeing a level playing field for all brake pad manufacturers. Dynamic solutions are the name of the game at Sustainable Conservation, and the Partnership’s willingness to adapt its strategy accordingly speaks to the importance of persistence and flexibility in effecting powerful environmental change.

In early 2009, Sustainable Conservation introduced Senate Bill (SB) 346, authored by Senator Christine Kehoe (D-San Diego), to reduce and eventually remove copper from brake pads sold in California, thereby addressing a serious threat to aquatic health and allowing local governments to meet their obligations under the Clean Water Act. The bill also requires that new brake pads meet all applicable safety and performance standards, and includes provisions to ensure that copper will not be replaced by materials containing other harmful substances.

**Victory, Regrouping**
SB 346 passed out of the California State Senate on June 3 – a very exciting day! To bolster our chances at success in the State Assembly, the Partnership decided to make SB 346 a two-year bill. For now, the bill is being held in the Assembly Committee on Environmental Safety and Toxic Materials, with the goal of taking it up again in the 2010 legislative session. This additional time will allow the Partnership to further clarify and strengthen the bill, and conduct outreach with and allay concerns for those individuals and organizations currently opposed to the bill (including the car companies). The coming months will also provide an opportunity to formalize implementation and enforcement specifics for the copper reduction program.

**The Road Ahead**
Building on a decade of sound science and balanced problem-solving, the Partnership has made extraordinary progress on behalf of California’s water quality in 2009. By raising consciousness about the power of our cooperative approach, Sustainable Conservation has already set a positive precedent in the Legislature. In 2010, we hope California will take the next big step by approving and signing SB 346 – a truly collaborative solution to a serious environmental problem.

To learn more, visit www.suscon.org/bpp.

After passing out of the California State Senate, SB 346, which aims to effectively eliminate all copper in brake pads sold in California, will go before the State Assembly in 2010.
SENATE BILL  No. 346

Introduced by Senators Kehoe and Simitian

February 25, 2009

An act to add Article 13.5 (commencing with Section 25250.50) to Chapter 6.5 of Division 20 of the Health and Safety Code, relating to hazardous materials.

LEGISLATIVE COUNSEL’S DIGEST


(1) Existing law establishes the Department of Toxic Substances Control in the California Environmental Protection Agency, with powers and duties regarding the management of hazardous waste. Existing law, administered by the department, prohibits the management of hazardous waste except in accordance with the hazardous waste control laws, including laws governing the removal of any mercury-containing vehicle light switch from a vehicle, and the regulations adopted by the department. A violation of the hazardous waste control laws is a crime.
The bill, commencing on January 1, 2014, would prohibit the sale of any motor vehicle brake friction materials containing specified constituents in amounts that exceed certain concentrations. The bill, commencing on January 1, 2025, would prohibit motor vehicle brake friction materials exceeding 0.5% copper by weight from being sold in California. The bill, commencing on January 1, 2014, would require all manufacturers of motor vehicle brake friction materials that are sold in this state to obtain a certification of compliance with these requirements from a 3rd-party testing certification agency, and to mark proof of certification on the friction materials. The bill would require a manufacturer of brake friction materials to file a copy of the 3rd-party certification with the department and to pay a reasonable filing fee. A violation of these provisions would be subject to a civil fine of up to $10,000 per violation. Because a violation of these provisions would also be a crime pursuant to the hazardous waste control laws, the bill would impose a state-mandated local program.

(2) Existing law requires the department to adopt regulations to establish a process to identify and prioritize chemicals of concern in consumer products. As part of this process, the department is required to adopt regulations for the evaluation of chemicals of concern in consumer products, including a process for evaluating alternatives.

This bill would direct the department to require vehicle brake manufacturers to comply with the regulations for the department’s evaluation of chemicals of concern and, before those regulations are adopted, to ensure that formulations developed to comply with the above content requirements are less harmful to health and the environment.

(2)

(3) The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.


The people of the State of California do enact as follows:

SECTION 1. The Legislature finds and declares all of the following:

1 2
(a) Friction materials are an essential component of motor vehicle brake systems and of critical importance to transportation safety and the public safety in general.

(b) Debris from friction materials containing copper in all of its forms, including, but not limited to, elemental copper and all of its alloys and compounds, are generated and released to the surrounding environment in the course of normal brake system operation.

(c) Tens of thousands of pounds of copper and other substances released from brake friction materials enter California’s streams, rivers, and marine environment every year.

(d) Copper is toxic to many aquatic organisms, including salmon.

(e) Limits on the copper content of brake friction materials are essential for California cities, counties, and industries to comply with federal Clean Water Act (33 U.S.C. Sec. 1251 et seq.) mandates, including copper water quality standards and copper total maximum daily loads in California’s urban watersheds.

(f) Without limits on the copper content of brake friction materials, California taxpayers face billions of dollars in federal Clean Water Act compliance costs.

(g) Changes in the composition of brake friction materials made to comply with copper water quality standards and successfully implement copper total maximum daily loads in California’s urban watersheds should meet all applicable safety standards.

SEC. 2. Article 13.5 (commencing with Section 25250.50) is added to Chapter 6.5 of Division 20 of the Health and Safety Code, to read:

Article 13.5. Motor Vehicle Brake Friction Materials

For purposes of this article, the following definitions apply:

(a) “Board” means the State Water Resources Control Board.

(b) “Department” means the Department of Toxic Substances Control.

(c) “Motor vehicle” has the same meaning as “vehicle” is defined in Section 670 of the Vehicle Code.

(d) “Testing certification agency” means an agency approved by the department as qualified and equipped for the certification
of testing of products, materials, equipment, and installations in accordance with nationally recognized standards.

25250.52. On and after January 1, 2025, any motor vehicle brake friction materials exceeding 0.5 percent copper by weight shall not be sold in this state.

25250.54. On and after January 1, 2014, any motor vehicle brake friction materials containing any of the following constituents in an amount that exceeds the following concentrations shall not be sold in this state:

   (a) Cadmium and its compounds: 0.01 percent by weight.
   (b) Chromium(VI)-salts: 0.1 percent by weight.
   (c) Lead and its compounds: 0.1 percent by weight.
   (d) Mercury and its compounds: 0.1 percent by weight.
   (e) Asbestiform fibers: 0.1 percent by weight.

25250.56. (a) The department shall require vehicle brake manufacturers to comply with the regulations adopted pursuant to subdivision (a) of Section 25253 in their development of brake friction materials that comply with Sections 25250.52 and 25250.54. In the process of complying with the regulations adopted pursuant to subdivision (a) of Section 25253, a manufacturer shall give specific consideration to the cumulative impacts on health and the environment of alternatives that increase the use of nickel, zinc, and antimony.

   (b) This section does not authorize the department to modify or disregard the requirements in Section 25250.52 or 25250.54.

   (c) Prior to the enactment of regulations implementing Section 25253, a vehicle brake friction material manufacturer shall exercise due diligence to ensure that formulations developed to comply with Sections 25250.52 and 25250.54 are less harmful to health and the environment.

25250.58. The following motor vehicle classes and brakes are exempt from this article:

   (a) Military combat vehicles.
   (b) Vehicles employing internal closed oil immersed brakes, or a similar brake system that is fully contained and emits no copper, other debris, or fluids under normal operating conditions.
   (c) Brakes designed for the primary purpose of holding the vehicle stationary and not designed to be used while the vehicle is in motion.
(d) Motorcycles.

25250.60. (a) Commencing on January 1, 2014, all manufacturers of friction materials used in brakes on new motor vehicles, or as replacement parts, that are sold in this state shall obtain certification from a third-party testing certification agency that each of their formulations for brake friction materials complies with Section 25250.54. A certification shall be valid for no more than three years. Manufacturers shall mark proof of certification on all brake friction materials.

(b) Commencing on January 1, 2025, all manufacturers of friction materials used in brakes on new motor vehicles, or as replacement parts, that are sold in this state shall obtain certification from a third-party testing certification agency that each of their formulations for brake friction materials complies with Sections 25250.52 and 25250.54. A certification shall be valid for no more than three years. Manufacturers shall mark proof of certification on all brake friction materials.

(c) Prior to its products being sold in this state, a manufacturer of friction materials used in brakes on new motor vehicles, or as replacement parts, shall file a copy of the third-party certification of each of its brake friction materials formulations with the department. The department shall charge a reasonable filing fee upon the filing of a copy.

(d) Manufacturers of friction materials used for brakes on new motor vehicles, or as replacement parts, may obtain certification of compliance with the requirements of Section 25250.52 or Section 25250.54 at any time prior to the dates specified in those sections.

(e) The department, in consultation with all interested parties, and on or before January 1, 2012, shall develop all certification and marking criteria required pursuant to this section.

(f) Commencing on January 1, 2014, vehicle manufacturers and retailers of friction materials shall ensure that only brakes certified for sale in this state are offered for sale in this state.

25250.62. (a) A violation of this article, including, but not limited to, offering brake friction materials for sale without first complying with subdivision (c) of Section 25250.60 or the falsification of third-party certification, by vehicle manufacturers, brake friction materials manufacturers, distributors, or retailers,
shall be subject to a civil fine of up to ten thousand dollars ($10,000) per violation.

(b) The department shall enforce this article. The department shall remove from sale in this state any replacement brake friction materials determined to be not in compliance with this article.

(c) In enforcing this article, the department shall not recall automobiles fitted with brake friction materials that do not comply with this article, but the department may impose fines and penalties authorized pursuant to subdivision (a) on automobile manufacturers whose vehicles are fitted with brake friction materials that do not comply with this article.

25250.64. This article does not limit, supersede, duplicate, or otherwise conflict with the authority of the department to fully implement Article 14 (commencing with Section 25251), including the authority to include products in a product registry established pursuant to the regulations adopted pursuant to that article or any testing or labeling requirements imposed pursuant to that article if those requirements are more protective of the public health and environment than those prescribed by this article. Notwithstanding subdivision (c) of Section 25257.1, vehicle brake pads shall not be considered as a product category already regulated or subject to pending regulation for purposes of Article 14 (commencing with Section 25251).

SEC. 3. No reimbursement is required by this act pursuant to Section 6 of Article XIIIB of the California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.
Reducing Water Pollution Caused by Vehicle Brake Pads

**Brake Pad Copper Control and Total Maximum Daily Loads**

- Copper from vehicle brake pads is polluting California’s urban waterways.
- There are limited options for intercepting or treating copper pollution.

As of 2006, 51 water bodies across California exceeded the amount for copper allowed under state and federal regulations. The vast majority of this copper comes from vehicle brake pads.

Local agencies, especially financially strapped cities like San Diego, Los Angeles, Sacramento, and San Francisco Bay Area cities, are being forced to deal with this pollution under the U.S. Environmental Protection Agency’s Total Maximum Daily Load (TMDL) mandates imposed through regional water quality control boards.

Several municipalities are already facing aggressive TMDL requirements and deadlines for achieving drastic reductions in copper pollution in 18 specific water bodies. Similar requirements are being drafted and are soon expected for all of California’s urban areas.

**Carefully Crafted Regulation is Imperative**

Senator Christine Kehoe has proposed Senate Bill (SB) 346 that would phase out the use of copper in motor vehicle brake pads and would also limit the use of other harmful water pollutants such as lead, mercury, zinc, cadmium and asbestos in brake pads.

- Senator Kehoe’s bill is essential for municipal agencies facing tough copper TMDL requirements.

Costly infiltration basins and land-use intensive vegetated strips and swales are the only runoff treatment measures that can remove sufficient amounts of copper to comply with copper TMDLs. High costs and the very large land areas required make these options rarely available in California’s highly urbanized areas. As a result, **treating runoff to remove copper is many times more expensive than treatment for other pollutants.** Installing urban runoff copper treatment measures like these would cost California municipalities billions of dollars. Regulating copper content in brake pads is a better and safer alternative.
The Cost of Waiting is Just Too Great

- Any delay in adopting or implementing SB 346 will put municipal agencies at risk.

Unless brake pad copper pollution reduction begins soon, non-compliance with TMDL requirements will be unavoidable. The potential fines for non-compliance are staggering, and many regional water quality control boards have shown a willingness to impose them if they believe no meaningful effort is being made to comply. The risk to municipalities is real – and not one they are willing to take.

Vehicle brake pads are the single largest source of copper in highly urbanized watersheds in California. To achieve compliance with Total Maximum Daily Loads (TMDLs), significant reductions in copper concentrations must occur. Compliance with TMDLs cannot be achieved without the brake pad source control proposed by Senator Kehoe.

SB 346 Protects Residents and Industry

Municipalities have been working for years to encourage manufacturers and other automotive industry leaders to reduce and eventually eliminate copper from brake pads. Those discussions have been productive but have fallen short of any substantive agreement regarding the timelines and leadership necessary to reduce brake pad copper pollution.

SB 346 is necessary to move this critical effort forward.

Domestic and international competition will undercut any attempt to voluntarily reduce copper in brake pads. Manufacturers would be left without the incentives to take advantage of alternative brake pad formulations. Protecting our watersheds from copper pollution through regulated source reduction is the only technically feasible and fiscally responsible solution. Regulation will ensure that source reduction is initiated in a timely fashion.

Senator Kehoe’s bill:

- Levels the playing field between all domestic and foreign manufacturers;
- Provides cost-effective means for improving water quality and avoiding far more costly treatment alternatives; and
- Is the only realistic and fair solution to a complicated threat to our state’s water quality.

Lobbyist Contact: Moira Topp, City of San Diego Legislative Advocate, Sloat Higgins Jensen & Associates (916) 446-3007 or mtopp@shjlobby.com
FACT SHEET
SB 346 (KEHOE) – Hazardous materials: motor vehicle brake friction materials
As amended June 7, 2010

PROBLEM: Elevated copper levels occur in urban watersheds across California. Dissolved copper is toxic to phytoplankton (the base of the aquatic food chain). It also impairs salmon’s ability to avoid predators and return to their home streams to spawn. Scientific studies have shown that the primary source of copper in highly urbanized watersheds is the fine dust generated by the use of vehicle brake pads.

Pursuant to the requirements of the federal Clean Water Act, the Regional Water Quality Control Boards in Los Angeles and San Diego have already imposed severe copper Total Maximum Daily Loads (TMDLs). Similar TMDLs are expected to be imposed on other urban watersheds across the state in the near future. The only technically and economically feasible way for municipalities to comply with these TMDLs is to eliminate copper pollution at its source – vehicle brake pads – no later than 2025. Any attempt to try and remove copper already dissolved in stormwater in highly urbanized areas would most likely require condemnation of large tracts of land and construction of elaborate infrastructure and cost already fiscally strapped local governments billions of dollars statewide with no guarantee that these methods would actually succeed.

SOLUTION: SB 346 would require brake pad manufacturers to reduce the use of copper in brake pads sold in California to no more than 0.5% by 2025. The bill also: 1) creates limits for other brake pad materials, 2) establishes a certification process by a third-party testing agency for compliance and requires the Department of Toxic Substances Control (DTSC) to charge a fee to cover the costs; 4) establishes civil penalties for violations; and 5) creates a Brake Friction Materials Water Pollution Fund into which any fines, penalties, and fees would be deposited. Funds collected would be used to implement the bill, upon appropriation by the Legislature. The goal is to improve California’s water quality and allow California stormwater agencies to meet their TMDLs in a timeframe that is aggressive but realistic for brake and vehicle manufacturers.

BACKGROUND INFORMATION:

The bill is sponsored by the City of San Diego and Sustainable Conservation, and is the result of a 15-year effort to understand and address the impact on the environment of brake pad wear debris generated during the use of motor vehicles. A series of interlinked, peer-reviewed laboratory, environmental monitoring, and environmental modeling studies established that brake pads are by far the most significant source of copper in runoff from urban watersheds. Details of these studies can be found at www.suscon.org/brakepad.

SB 346 provides industry with a generous timeline within which to develop and distribute safe and effective copper-free brake friction materials, gives cities and counties the ability to demonstrate that they will meet their copper TMDLs in a timely manner, and removes a serious threat to the health of salmon and other aquatic life in California’s urban watersheds.

For further information, please contact Linda Barr at (916) 651-4477 or by email at linda.barr@sen.ca.gov, or Justin Malan at (916) 448-1015 or by email at Justin@ecoconsult.biz.
Supporters:

- Sustainable Conservation (co-sponsor)
- City of San Diego (co-sponsor)
- California Stormwater Quality Association
- TDC Environmental
- Coalition for Practical Regulation (representing 40 cities)
- League of California Cities
- Bay Area Stormwater Management Agencies Association (representing 84 cities and 7 counties)
- California State Association of Counties
- San Diego Coastkeeper
- UC San Diego
- Port of San Diego
- U.S. Navy
- Environmental Entrepreneurs
- Sierra Club California
- Natural Resources Defense Council
- Center for Environmental Health
- California Association of Environmental Health Administrators
- California Product Stewardship Council
- Forests Forever
- Heal the Bay
- Clean Water Action
- Planning and Conservation League
- California League of Conservation Voters
- StopWaste.Org
- City of Signal Hill
- City of Lynwood
- City of Carson
- City of Whittier
- City of Downey
- City of Cerritos
- City of Vista
- City of Torrance
- Los Angeles County Flood Control District
- City of Arcadia
- City of Los Angeles
- City of Rolling Hills
- City of Vernon
- Ventura Countywide Stormwater Quality Management Program
- City of Duarte
- City of Sante Fe Springs
- City of Lakewood
- City of Camarillo
- Coastal Environmental Rights Foundation
- City of Commerce
SB 346
Page 3

Supporters:

City of Covina
Industrial Environmental Association
City of San Jose
City of Thousand Oaks
City of Monterey Park
City of Bellflower
City of Paramount
City and County of San Francisco
Alameda County Board of Supervisors
Ventura County Board of Supervisors
City of Santa Marina
City of Long Beach
City of Ventura
June 3, 2010

The Honorable Pedro Nava
Chair, Assembly Committee on Environmental Safety & Toxic Materials
State Capitol, Room 2148
Sacramento, CA 95814

Subject: SB 346 (Kehoe) – Source Control of Copper Water Pollution –
Support As Proposed To Be Amended

Dear Assemblymember Nava:

The Bay Area Stormwater Management Agencies Association (BASMAA) strongly supports SB 346 (Kehoe), which will provide California’s cities and counties with the tool they need to comply with stringent federal and state water quality mandates and avoid billions of dollars in costs and penalties. SB 346 requires that copper, an extremely significant aquatic pollutant, be reduced to a de minimis 0.5% by weight in vehicle brake pads sold in California by 2025. Peer-reviewed scientific studies have established that by far the most significant source of copper in urban watersheds is the fine dust generated from the use of brake pads.

Pursuant to the requirements of the federal Clean Water Act, the Regional Water Quality Control Boards in Los Angeles and San Diego have already imposed severe copper Total Maximum Daily Loads (TMDLs). Similar TMDLs are expected to be imposed on other urban watersheds across the state in the near future. The only technically and economically feasible way for municipalities to comply with these looming deadlines is to eliminate copper pollution at its source – vehicle brake pads – no later than 2025. Any attempt to try and remove copper already dissolved in stormwater in highly urbanized areas would most likely require condemnation of large tracts of land and construction of elaborate infrastructure. This could easily cost already fiscally strapped local governments billions of dollars statewide with no guarantee that these methods would actually succeed.

SB 346 provides industry with a generous timeline within which to develop and distribute safe and effective copper-free brake friction materials while also giving cities and counties the ability to demonstrate that they will meet their copper TMDLs in a timely manner without having to spend billions of dollars to do so. BASMAA and its 96 member agencies are pleased to support SB 346.

Very truly yours,

James Scanlin, Chair
Bay Area Stormwater Management Agencies Association

cc: Senator Christine Kehoe
Assemblymember Ira Ruskin

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1 BASMAA is a consortium of nine municipal stormwater programs in the San Francisco Bay Area representing 96 agencies, including 84 cities and 7 counties. The members of BASMAA are responsible for complying with the requirements of municipal separate storm sewer system (MS4) National Pollutant Discharge Elimination System (NPDES) permits issued by the San Francisco Bay Regional Water Quality Control Board (Water Board).