

A Message from the Executive Director...

October 2005

Well, I asked myself, should I cover Katrina? Before I could decide, here came Rita. Now, all of you know that here in California we are constantly experiencing drought, flood, fire and slopes slipping, along with houses and related structures. I have pondered over the comparison of the West Coast happenings vs. the Southeast area with their hurricanes and tornadoes. I do believe, I'll take the West Coast.

Going back to the hurricanes, as everybody is aware, there were numerous efforts to collect money, spearheaded by the Red Cross, and a whole bunch of money was in fact collected and hopefully, disbursed honestly. Our industry leaders have contributed resources that have provided the assistance that was needed. Along with the public safety folks, our water and wastewater guys and girls gave of their time most generously. We should be proud. I have always said that water and wastewater folks are the best (of course I consider myself one of them).

I searched back in my memory (although the memory is not as good as it once was, it does go back a long way) and I remember that in the sixties when Alaska experienced that giant earthquake, I had the opportunity to relocate to Alaska and help rebuild the infrastructure. Being a newly married guy (and of course, in charge) my wife said, "If you go, please write." So, you guessed it.

A couple of weeks ago, the SCAP Collection Systems Committee gave a workshop in South Orange County. We were hosted by Dave Caretto of the South Orange County Wastewater Authority (SOCWA) at the City of San Juan Capistrano's Senior Facility. Thanks Dave, what a guy. We had enough food provided by Dave that we could have fed an army. Our turnout was spectacular, 49 people. Questions/Answers went so long we were kicked out by the seniors who had showed up for their daily senior lunch. SCAP has put a few of these workshops on over the past few months and let me tell you, the response has been very encouraging. The Regional Board staff, health folks and even representatives from the State Board have participated. It's amazing to me how much small agencies are not aware of what they are faced with. I truly believe that we have provided a service that is of great interest and necessity to them.

Upcoming Meetings

Air Quality Specialty Workshop –
"Engine Regulations 101" –
Thursday, October 6, 8:30 am – 3 pm,
OCSD (Registration is closed for this
workshop).

Air Quality Committee – Tuesday,
November 8, 10-Noon, LACSD.

Biosolids Committee – Wednesday,
October 19th, 10-Noon, LACSD.

SCAP Board of Directors Meeting–
Tuesday, October 4, 10 am – 2 pm at
OCSD.

Joint Collection Systems and
Water Issues Committee Meeting
– Tuesday, November 8, 10am – 2pm
at IEUA.

We are closing in on choosing my successor. October 1st was the deadline for submitting letters of interest. An appointed committee will be reviewing the submittals and making recommendations to the full Board of Directors. The Board will then conduct interviews and ultimately will make a selection. The anticipated timetable for the transition is January 1, 2006. Wait, don't count me out yet, I have agreed to hang around and assist as long as the new person wants me to. After all, when you get to where I am in life, there isn't much more to offer than your years and years of experience. Stay tuned.

Stormily yours,

Ray Miller

Air Quality

SCAP Air Quality Committee Update by Chair Daniel McGivney

As noted in last month's newsletter, engines are a vital part of our business and are currently under great scrutiny and regulation by air quality regulatory agencies. In fact, so many regulations have either been recently adopted or are currently under development by multiple regulatory agencies (U.S. EPA, California Air Resources Board, and local air pollution control or air quality management districts), that it has become incredibly difficult to both understand and manage these often times complex regulations.

The EPA has adopted new regulations for newly manufactured non-road engines, adopted new regulations requiring the manufacture of ultra-low sulfur fuel and has other engine related regulations under development as we speak. The State of California Air Resources Board (ARB) has adopted many regulations over the last couple of years affecting diesel-fueled engines and vehicles. These include regulations affecting stationary emergency engines, portable engines, and refuse trucks. Currently under development are fleet rules for H/D trucks and a control measure for spark-ignited engines. The SCAQMD has recently adopted a rule that implements the ARB's regulation for stationary diesel-fueled engines, but added additional requirements such as requiring an emissions control device if the engine is located within 100 meters of a school boundary. The SCAQMD is currently revising Rule 1110.2 that affects all stationary and portable engines and will have significant financial and operational impacts upon any agency utilizing natural gas fueled engines for activities such as power supply, water pumping and aeration. And there are many more examples.

Committee Chair Contact Info

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On October 6th, the SCAP management team and the members of the Air Quality Committee are holding a workshop at Orange County Sanitation District on engine regulations. Due to the overwhelming response for this workshop, registration is now closed. However, the presentations and handouts for this workshop will be posted to the SCAP website and a notice will be sent out when they are available.

Biosolids

Biosolids Utilization in the Cement Industry Conference by Chair Diane Gilbert

On November 2, 2005, the West Coast Section of the Air and Waste Management Association, the Cement Industry Environmental Consortium and the Mojave Desert AQMD will be sponsoring "Biosolids Utilization in the Cement Industry" at the Double Tree Hotel located at the Ontario Airport.

The conference makes a significant contribution to the science of biosolids and biowaste treatment and disposal including, engineering, strategic planning, regulation and sustainability.

Registration information may be obtained by calling Mojave Desert AQMD at (760) 245-1661, ext. 5538 or by email to edejarnette@mdaqmd.ca.gov. A copy of the conference brochure is available on the SCAP website at www.scap1.org/reference/biosolids

Collection Systems

South Orange County Statewide WDR Update Presentation by Chair Nick Arhontes

On September 13, 2005, at the request of SOCWA, the SCAP Collection Systems Committee (CSC) provided an update presentation on the current status of the state of California's proposed statewide WDR for all publicly owned collection systems within the state. The SOCWA presentation was similar to those previously conducted in San Diego and, like the San Diego presentations, highlighted the similarities and differences between the current Region 9 (San Diego) WDR and the proposed statewide WDR. Just under 50 people attended the presentation, representing most of the cities and water/sanitary districts in south Orange County. Cities, whose sanitation requirements are provided by special districts, were encouraged to attend.

SCAP welcomes our newest member, Crescenta Valley Water District. CVWD provides water service and wastewater collection to its constituents in La Crescenta, Montrose, and portions of Glendale, and La Canada Flintridge.

Glad to have you back again,
Dennis.

A higher level of cooperation between cities and special districts was stressed due to the requirements of the WDR to incorporate fats, oils, and grease (FOG) programs for food service establishments within the cities and the current requirement cities have to prevent sewage or other pollutants from entering their storm drain system. The current increase in dry weather

diversions also requires a higher level of cooperation between cities and special districts. The presentation was scheduled to last two hours with over half of that time dedicated to a question and answer period. Committee Chair Nick Arhontes of OCSD conducted the Q&A session, which was very lively with an abundance of quality questions and comments.

A special thanks to Victor Vasquez from Region 9, Larry Honeybourne from OCHCA and Omar Sandoval from Woodruff, Spradlin & Smart and all attendees who offered very timely comments during the Q&A session. Also, a special thanks to Ziad Mazboudi, Senior Engineer with the City of San Juan Capistrano, who provided an excellent meeting facility and Dave Caretto of SOCWA who co-hosted the event.

On October 10th, Chris Toth of the City of San Diego, a CSC member and Chair of the SSO Guidance Committee's Training and Outreach subcommittee, will be giving a similar presentation to the Del Mar City Council. The CSC has partnered with Chris and his SSO committee to assist in developing informational presentations on the new statewide WDR to be utilized throughout the state.

Water Issues

Proposed Total Residual Chlorine and Chlorine Proposed Oxidants Policy of California

by Chair Roger Turner

The proposed Total Residual Chlorine (TRC) and Chlorine-Proposed Oxidants (CPO) Policy of California is one of the most recent and significant challenges in regulatory policy. This is one of those regulatory works that originated because there is no consistent policy in California for levels of chlorine in wastewater and potable water discharges. The State Water Resources Control Board (State Board) recognized this point in developing this policy, noting that only four of the nine regional Boards have numeric criteria for chlorine residual in discharges. Therefore, the State Board finds it appropriate to establish uniform objectives for TRC and CPO for inland surface waters and enclosed bays and estuaries. Note, that this new policy does not apply to ocean dischargers.

The State Board is following the classic policy model for establishing effluent limitations for TRC and CPO with respective compliance schedules and monitoring requirements. The goals of this policy are to provide a consistent regulatory requirement throughout the state for TRC and CPO, to protect aquatic life beneficial uses, and to provide an equitable basis for compliance enforcement.

There is no current state policy for Water Quality Based Effluent Limits (WQBELs) to calculate TRC and CPO discharges. WQBELs are required for all pollutants in a point source discharge that have reasonable potential to cause or contribute to an excursion above the water quality criterion. Note that the state has no water quality criterion for TRC and CPO. Also, the effluent limitation must protect against acute and chronic impacts.

The State Board staff is recommending the following effluent limits for TRC and CPO:

Water Type	1 - Hour	4-Day
TRC (freshwater)	0.019 mg/L	.011 mg/L
CPO (saltwater)	0.013 mg/L	0.0075 mg/L

Currently, permits vary throughout the state for managing chlorine residual in discharges. The State Board recommends continuous monitoring, which is defined as one data point or more every minute. The State Board argues that this frequency allows for spikes in the data and an average value will be better to average the data when spikes occur. It is important to note that any excursion over the one-hour average or four-day average would be considered a violation in the proposed policy under the mandatory minimum penalty rule.

The proposed limits create concern because chlorine analyzers cannot reliably and consistently measure chlorine residual at the low levels under field conditions.

Chlorination/dechlorination processes are complex processes that produce variable results in chlorine residual. This can create problems for compliance in short term monitoring programs with one-minute intervals. This program needs more work to develop a fair monitoring program.

There is no statewide policy authorizing schedules to comply with WQBELs for TRC or CPO in NPDES permits for discharges to inland surface waters and enclosed bays and estuaries. Many Regional Boards have not established compliance schedules while others have generally set 10 years to meet newly adopted water quality criteria or a new water quality objective. The State Board has recommended a two-year compliance schedule, which they feel is reasonable to add the capability to monitor continuously for TRC or CPO.

It is very important when developing a compliance program that a fair and reasonable implementation program be developed as well. The current proposal does not provide a realistic consideration of what it will take to implement the proposed requirements. The proposed policy recommends a two-year compliance process for agencies to develop the infrastructure that will remove total chlorine residual from their treatment process before discharging it into waters of the state. A more realistic implementation schedule would be at least five years since dechlorination systems would have to be redesigned and upsized for each agency.

It is also appropriate to develop a Minimum Level (ML) process for total residual chlorine. This would address the issues of calibration, measurement and validation of the instrument measurement. The ML is the concentration at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ML is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure. This is typically done for many organic, inorganic and pesticide substances and should also be done for TRC given its potentially significant impact to the regulated community.

The State Board held two public workshops, one in northern California on September 26, 2005 and one in Southern California at MWD on September 29, 2005 to present this new policy

and to hear input from the public. SCAP presented its concerns at the September 29, 2005 meeting. SCAP will report the results of these workshops in the next newsletter.

Regulatory Affairs

The Summit Group by Regulatory Affairs Consultant Mary Jane Foley

This past year, Ray Miller, Executive Director of SCAP, initiated a new venue – the Summit Group that brings together the five POTW associations (BACWA, CASA, CVCWA, CWEA, and SCAP) to discuss key issues of concern for all regions of the State. Quarterly, the Executive Director, Presidents of their respective Boards and key consultants meet and confer on strategies and priority issues that need the global input from all associations and their memberships. On September 27, 2005, the group met in

Sacramento to discuss several items that need continuous leadership and resolution. The Operator Certification Program has been a key focus of the group. A position paper has been developed and will be circulated to each of the associations' Boards and then presented to the Water Board EO, Celeste Cantu and her staff. Other issues that continue under discussion are the CTR/SIP 2010 Compliance Deadline and the SWRCB SSO Enforcement Initiative, which all groups have been working on with the SWRCB staff. Water Board Member, Art Baggett spent considerable time with the group dialoguing on changes at the Water Board and critical issues that will be of interest to our collective memberships in the upcoming year. The Summit Group meets in Sacramento to accommodate the schedules of the regulators. Each meeting includes top appointed officials and key management staff for cross communication on regulatory issues that are current or pending. The next meeting will include newly appointed SWRCB Chair, Tam Doduc and Celeste Cantu.

Big Bear Area RWA Groundwater Recharge Project

Recently, SCAP was requested to support the position of Big Bear Area Regional Wastewater Agency for their Groundwater Recharge Project. SCAP, along with CASA and WasteReuse, provided full endorsement of the project. Letters of support can be viewed on Big Bear RWA's website at: www.bigbearwatersolutions.org under "List of Supporters."

Help Desk

Remember the HELP DESK is open 24/7 for members who need to discuss permitting issues and strategies to assist agencies in resolving problems with regulatory agencies. Please contact Mary Jane Foley at mfoley@scap1.org.

Non Sequitur

There are two big forces at work, external and internal. We have very little control over external forces such as tornadoes, earthquakes, floods, disasters, illness and pain. What really matters is the internal force. How do I respond to those disasters? Over that I have complete control.

Leo Buscaglia