



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

MONTHLY UPDATE

A Message from the Executive Director...

March 2006

Looking back at the issues facing the SCAP member agencies over the last 10 years, it reminded me of the old saying, "Those were the days." It seems like only yesterday that we were strategizing over implementation of the California Accidental Release Prevention Program (CALARP), which was replacing the now-defunct California Risk Management and Prevention Program (RMPP). (Anyone remember the JARP steering committee and how successful it was?) How about the Statewide Portable Equipment Registration Rule, which was passed by CARB in 1997? Boy, those were the days! Little did we know that 8 years later we would be facing even bigger challenges with the Portable Diesel Engine ATCM and emission restrictions on off-road mobile sources.

On the biosolids front, remember back in 1998 when Ojai Valley, Montecito and the Goleta Sanitary Districts were working with Ventura County's Resource Management Agency to head off the Ventura County ban on biosolids land application? While that effort was successful, the upcoming battle over Kern County's Biosolids Initiative is just beginning. This may simply be the tip of the iceberg and we could possibly be looking back 10 years from now and saying, "Those were the good old days."

Let's not forget water issues either. I believe it was in 1997 that the EPA Region IX first published the draft California Toxics Rule for public comment. Remember SCAP's concerns over tightening controls on point sources rather than balancing point and non-point sources and the consequences of not addressing effluent dependent water bodies? Or questions we had on how the Toxicity Reduction Evaluation (TRE) would be implemented? Weren't those the days? Life was really easy and carefree back then! [Editor's Note: John is trying to be sarcastic here in case you missed it.] Today, we are focused on issues like the "Water Quality Control Policy for Developing California's CWA Section 303(d) List" and the SWRCB's proposed electronic Self-Monitoring and Reporting (e-SMR) system, to name a few.

No, I didn't forget the SWRCB's statewide WDR for all publicly owned sewer collection systems. It's just that I didn't have anything to compare it to from 10 years ago, except maybe

Upcoming Meetings

Collection Systems Committee
– SWRCB Region 4 Workshop:
Proposed Statewide WDR,
Monday, March 13th, 9am-3pm at
LACDPW.

Water Issues Committee –
Wednesday, March 15th,
10:30am-12:30pm at LACSD.

Air Quality Committee –
Thursday, March 16th, 10-Noon at
LACSD.

SCAP FY 06/07 Dues

SCAP will be sending out the 06/07 dues invoices within the next few weeks to assist our member agencies in preparing their 06/07 budgets. As previously announced in the July 2005 *Monthly Update*, the SCAP Board of Directors approved a dues increase equal to the COLA for the previous calendar year. For this year, the increase will be 4.4% (2005's COLA).

CMOM. By now you are probably tired of hearing this but, “Those were really and truly the days.”

However, as the new kid on the block [Editor’s Note: Who does he think he’s kidding? Most vehicles his age would have been scrapped long ago.], I am truly encouraged by re-visiting the results of our committees’ past accomplishments on these important issues. As I get more involved with not only the SCAP committees, but with Tri-TAC and the other wastewater groups, I can’t help but wonder where our agencies would be today without these dedicated people. It just goes to show [Editor’s Note: No, please don’t say it again!], “The more things change, the more they stay the same.”

Nostalgically yours,

John Pastore

Collection Systems by Chair Nick Arhontes

WDR Public Hearing

Several SCAP members were in attendance and spoke at the SWRCB’s public hearing on February 8th in Sacramento. Board Chair Tam Doduc capably ran the hearing, which included verbal presentations by about 30 public agencies and cities, wastewater associations and NGOs. Near term outcome was an extension until February 22nd to provide the Chair with added input on NPDES v. WDR and a new “two tiered” approach suggested by the NGOs, discharge prohibition, a narrower affirmative defense criteria, and implementation schedule. Members should also continue to follow the SWRCB’s SSO homepage at: <http://www.waterboards.ca.gov/ss0/index.html>. The Collection Systems Committee (CSC) will also be sending updates to the members through SCAP office staff.

<p><u>Committee Chair Contact Info</u></p> <p>Air Quality Chair: Dan McGivney – dmcgivney@emwd.org</p> <p>Biosolids Chair: Diane Gilbert – diane.gilbert@lacity.org</p> <p>Collection Systems Chair: Nick Arhontes – narhontes@ocsd.com</p> <p>Water Issues Chair: Roger Turner – turnerr@emwd.org</p>

League of California Cities (LOCC) Presentation

CSC members Nick Arhontes and Bob Kreg will be presenters at a LOCC Public Works Officers Institute (PWOI) and Expo as an outreach effort to LOCC members in Southern California. Presentations will focus on the upcoming SWRCB WDR effort and ideas for local and regional approaches to ensure awareness and success. The event will be in San Diego on the afternoon of March 2nd. Outcomes may lead to better working relationships among SCAP and LOCC members.

Region 4 Workshop re: Proposed Statewide WDR – March 13, 2006

The CSC also focused on preparing for its next regional workshop on Monday, March 13th. The event will be held at the Los Angeles County Department of Public Works facility in Alhambra. This workshop is intended to be a primer on the requirements of the proposed WDR and will cover all of the major elements of the WDR necessary for the creation of a site specific and effective Sewer System Management Plan (SSMP). Bryan Brock of the SWRCB will also cover the new electronic reporting requirement as one of the program segments. We also plan to offer CWEA contact hours for CWEA Collection Systems Maintenance certificate holders. We thank our local hosts, Sam Espinoza of LACSD and Nick Agbobu of LA County Public Works Department, for their leadership in planning the event. It's expected that this workshop will be a springboard for future workshops in SCAP's service area as it relates to the SWRCB's much anticipated WDR (we hope) Order. Seating is limited, so please get your registration form in early. If you need a registration form, please contact the SCAP office.

SCAP Planning Session

The CSC Chair participated in the SCAP Board's Planning Session for 2006-07, which focused on enhancing the effectiveness of the committees. The committee chairs will be meeting to further develop suggested priorities for tasks for the coming year and funding or in-kind staff support needs for the Board's consideration. This is an important step in developing a long-range work plan for SCAP and its current and new members. More information will be forthcoming separately on this important project.

Is your local friendly chemical salesperson or telemarketer begging you to try their product in your sewer or the upstream private facility? Do you know what its impacts may be to your system or the downstream WWTP or WWRP? Feel somewhat alone in this decision making process? Think SCAP could help? Tell us what you think.

Water Issues by Chair Roger Turner**Total Residual Chlorine Draft Policy**

There is nothing new to report on the State Water Resources Control Board's (State Board) Total Chlorine Residual Policy for California. The expected public draft policy was not developed or distributed in January 2006. This policy will continue to be monitored. When new information is available it will be provided.

Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies

The State Water Resources Control Board completed a draft Waste Discharge Requirement (WDR) General Permit for Wastewater Collection System Agencies and has held a Public Hearing to receive additional input for developing this important permit. This new permit will affect all publicly owned sewer collection systems in California. During the public testimony, one of the most controversial points made was whether the NPDES or WDR permit would be the

best one for this General Permit. SCAP has argued that an affirmative defense for a Sanitary Sewer Overflow (SSO) should be permitted for unforeseen events, such as extreme wet-weather, vandalism, or contractor impacts. These are exceptional, outside the normal control of an agency's ability to prevent a sewage spill. A Sewer System Management Plan (SSMP), when developed, would help reduce and prevent SSOs.

The California Integrated Water Quality System (CIWQS)

The California Integrated Water Quality System (CIWQS) is a new computer system for the State and Regional Water Quality Control Boards to track information, manage permits and other orders, track inspections, and manage violations and enforcement activities. CIWQS includes an electronic Self-Monitoring Report (eSMR) tool for submission of monitoring reports via an Internet website. CIWQS is part of an overall effort to integrate several disparate legacy systems, compile water quality data, standardize permits, automate processes, and to make data more accessible to State Water Board staff, dischargers, the public, and the U.S. Environmental Protection Agency.

Currently, CIWQS is focusing on supporting the National Pollutant Discharge Elimination System (NPDES) program and its requirements to submit monitoring reports. Some dischargers have been in training developing test reports with the help of their Regional Boards and submitting these test reports into the CIWQS program. As with any new program, this one has had its share of problems. The State Board has been working with dischargers, Regional Boards and their consultant to "fix" the problems with the program. So far, dischargers in the Colorado River Basin and Santa Ana Regional Water Quality Control Boards have been contacted. These dischargers will be submitting an electronic and paper report for the next three months. The State Board will begin working with the Central Coast Regional Water Quality Control Board next. Stay tuned to see how this program works out.

Biosolids by Chair Diane Gilbert

Kern County Notice of Preparation for Kern County Biosolids Ordinance Environmental Impact Report

On February 3, 2006, the Kern County Planning Department released the Notice of Preparation (NOP) for the Kern County Biosolids Ordinance Environmental Impact Report (EIR). The NOP is being issued by Kern County to comply with the Appellate Court's decision in the Kern County Class B lawsuit.

The EIR will evaluate the potential environmental impacts of the proposed amendment of the existing Kern County Biosolids Ordinance to prohibit all land application of all categories of biosolids on land in the unincorporated Kern County, as well as alternatives to a total ban on land application and alternative disposal option. Comments on the NOP are due March 6, 2006. SCAP is encouraging member agencies to review the NOP and submit comment letters by the deadline. If member agencies require additional information regarding the NOP or the EIR process contact the Biosolids Committee Chair Diane Gilbert (310-648-5248) or Co-Chair Karen Soares (562) 699-7411.

HILL CANYON WASTEWATER TREATMENT PLANT PROFILE

Snapshot

Facility: Hill Canyon Wastewater Treatment Plant
Operator: City of Thousand Oaks
Capacity: 14 million gallons
Completed: 2005
Serves: Approximately 127,000 people
Employees: 26

The City of Thousand Oaks' Hill Canyon Wastewater Treatment Plant (HCTP) is a world-class nutrient removal tertiary treatment plant.

Already awarded APWA's 2005 environmental project of the year for its wetlands creation project, HCTP will also be starting up a cogeneration project in 2006 using anaerobic digester gas that will provide 40-45% of the facility's electrical load. The City has also begun the request for proposal process for evaluating a power purchase agreement with a solar energy provider for an additional 500Kw of electrical generation.

"If the solar power purchase agreement wins City Council approval, there probably will be times during the day when we will be off the grid," said Chuck Rogers, Hill Canyon's Superintendent. "To be able to run a treatment plant in its entirety during periods of highest electrical system demand on solar and cogeneration will be fairly unique."

Rogers said the projects were funded by CPUC grants administered by Southern California Gas and Southern California Edison.

"People should take a look at the grants because they can help make these projects economically viable," Rogers said. "The application process is simple, and there are funds available for a variety of cogeneration or solar technologies."

Rogers said Hill Canyon's biggest current environmental issue is water reclamation. The Calleguas Creek Watershed, which HCTP discharges into, is in the midst of the TMDL process for variety of pollutants. The findings of those TMDL studies have the potential to have significant effects on ratepayers. One major issue is chloride levels, which impact the farmers in the service area using reclaimed water.

"We've reached a definite point of marginal return on investment," Rogers said. "Even minor water quality improvements have the potential to be exceptionally expensive. Like other agencies facing marginal returns on investment, we have to ask, 'If we go to the next level of improvement, what are the environmental benefits in relationship to costs?'" Rogers believes that it's a fair and responsible question, and he remains confident that the City will make the right decisions for its citizens and the environment.

Regulatory Affairs by Regulatory Affairs Consultant Mary Jane Foley

Last month, I reported that the Governor had launched a bond measure for \$222 billion for statewide investment in many public infrastructure areas. The legislative bills for this purpose are AB1839 and SB1166. This month, SCAP has dedicated hours of work to raise awareness about how the administrative (legislative and state agency) leadership has omitted the necessary wastewater system infrastructure in the current proposed bond legislation.

In my role as regulatory consultant, I worked directly with Mike Dillon of CASA to develop an action plan recognizing the needs of the POTW community, which would be presented to the legislature. We were able to secure reliable numbers to present to the legislature from an SWRCB/EPA Clean Water Needs Assessment and the State SRF loan program: \$11 billion quantified need over the next 10 years for POTWs. CASA has worked the legislative arena and I have advocated with the agencies in charge of rewriting the bond measures. Every person who will put pen to paper rewriting these bond issues has been educated that wastewater needs are a critical part of any clean water bond language that moves forward.

The Senate Natural Resources and Water Committee meetings on these bond bills have concluded. These committees will be making recommendations to the administration, which we hope will include resources for wastewater. On February 21, 2006, the Assembly Democrats' proposal was unveiled. Five billion dollars is included for safe drinking water and **wastewater treatment/wastewater needs**.

The administration has heard our pleas for wastewater needs, and they are considering fully funding the State Revolving Loan Fund. I believe all these negotiations have to be completed by March 10, 2006 in order to get something on the June ballot. We will keep you informed.

On another matter, John Pastore and I attended the February State Waterboard hearing in Sacramento on the SSO WDRs. We were part of a coalition of POTWs that addressed the improvements needed in order for this new regulatory program to function for the regulated community. We focused our comments on statewide consistency and funding needs. As the presenter for SCAP, I was asked a few questions by Chair Tam Doduc. My favorite question was on a zero prohibition for spills. I stated that, as a former State Water Board Member, I didn't believe in zero. It is not an attainable number and I believe that water quality standards should be attainable. Chair Doduc asked for more input on a two-tiered approach for both WDRs and an NPDES permit, affirmative defense, a prohibition of spills, and modifications to the time schedules for Sewer System Management plans. The next hearing has not yet been scheduled.

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

Tell me, and I'll forget. Show me, and I may not remember. Involve me, and I'll understand.

Native American Proverb