



SOUTHERN CALIFORNIA ALLIANCE OF  
PUBLICLY OWNED TREATMENT WORKS

# MONTHLY UPDATE

## A Message from the Executive Director...

May 2006

I recently had the pleasure of attending a retirement dinner for Blake Anderson. Most of you probably know Blake from his previous positions as General Manager of OCSD and SCAP Board member. However, as I was to find out, Blake was much more than that. His professional accomplishments and list of organizations that he represented are far too numerous to recount here. I was genuinely touched at the outpouring of love and appreciation for what Blake has meant to both his co-workers and the wastewater community. It confirmed my suspicion that Blake, like the rest of us, wasn't in it for the money. Not many of us are realistically going to retire and buy an island somewhere in the South Pacific. [Editor's Note: Although, I understand that Ray Miller recently purchased some oceanfront property somewhere in Arizona.] What riches we do gain, however, are measured in an entirely different manner. It's called, "personal relationships." Or, as Blake so eloquently put it, "It's not about the awards received or the successes one achieves, it's about the personal relationships that we develop throughout our career. That is the ultimate reward."

The one thing I have learned over my career is that we cannot accomplish anything entirely by ourselves. It takes a collaborative effort of the entire group to effect change. And, so it is with SCAP. In an effort to achieve uniformity in dealing with issues of statewide concern, SCAP has developed a personal relationship with other wastewater organizations having similar goals. Many of you are aware of the group now called the "Clean H<sub>2</sub>O Summit Group." For those of you who are not, the Summit Group is comprised of a number of non-profit organizations that represent nearly all of California's public agencies involved with wastewater collection, treatment or disposal. The group includes SCAP, the California Association of Sanitation Agencies (CASA), the Bay Area Clean Water Agencies (BACWA), the California Water Environment Association (CWEA), and the Central Valley Clean Water Association (CVCWA). The Summit Group meets quarterly in Sacramento to discuss legislative and regulatory issues that affect our agencies on a statewide basis.

Of particular concern lately, have been the issues of operator certification and recruitment. This is a problem that many agencies have struggled with individually or regionally but, until

### Upcoming Meetings

**Air Quality Committee –**  
Thursday, May 11<sup>th</sup>, 10-Noon at  
LACSD.

**Biosolids Committee –** Joint  
SCAP/Tri-TAC meeting,  
Thursday, May 11<sup>th</sup>, in Ontario.

**Collection Systems Meeting –**  
Thursday, May 25<sup>th</sup>, 11am-3pm  
at OCSD.

**Collection Systems WDR  
Workshop –** Thursday, July 20<sup>th</sup>,  
San Diego Metropolitan  
Wastewater Facilities. (Details to  
follow at a later date)

**SCAP Board of Directors –**  
Tuesday, June 13<sup>th</sup>, 10-Noon at  
OCSD.

**Water Issues Grants Workshop**  
– Date TBA

now, has not been addressed collectively statewide. There is an enormous need for qualified water and wastewater operators in the coming years. It is predicted that within the next 5 years, there will be a dire shortage of qualified operators, as more and more of the senior-aged operators retire. Filling the void left behind will put an additional strain on the finances of cities and districts alike, who will be forced to compete with each other for the limited operator resources. It is for this reason that the Summit Group, particularly through the efforts of CWEA and CVCWA, is exploring numerous ways in which to solve this growing problem. Presently, we are discussing such things as: educational outreach programs to elementary and high school students, participation in career days, cooperative course programs with local community colleges, agency internship programs and working with the State's Division of Operator Certification to broaden qualification requirements for certification.

While I'm on my soapbox [Editor's Note: It's more like an ivory tower], let me say that society needs to realize that our operators are truly environmental heroes. They work selflessly, day-in and day-out, facing regulatory challenges, fiscal uncertainties and potential health risks to make our world a safer place in which to live. With that said, I will leave you with these words of wisdom from Benjamin Franklin, "When the well's dry, we know the worth of water."

Personally yours,

John Pastore

**Air Quality** by Chair Daniel McGivney

**SCAQMD Facility Information Module**

The SCAQMD has developed a database that will be put on its website in the very near future that will allow the public to access virtually any and all air-related information about a facility and its permitted equipment. The database will allow the public to access actual copies of permits, Notices to Comply (except for those specifically requesting records), Notices of Violation, a link to an already existing database for reported annual emissions (criteria & toxic air contaminants), maps showing facility location (including other permitted facilities and schools nearby), aerial photographs that allow the person to zoom down onto a facility and see the facility layout and information regarding all Hearing Board actions (variances, orders for abatement, etc.). These Hearing Board documents will include all application materials and exhibits provided by the regulated facility as well as documents created by the SCAQMD during the variance process. This database will provide an enormous amount of information about a regulated facility that can only now be obtained by a specific public records act request. One concern raised was the potential security risks that could result from airing all the information, particularly when coupled with aerial photographs of facilities

<p><b><u>Committee Chair Contact Info</u></b></p> <p><b>Air Quality Chair:</b>          Dan McGivney –  <a href="mailto:dmcgivney@emwd.org">dmcgivney@emwd.org</a></p> <p><b>Biosolids Chair:</b>          Diane Gilbert –  <a href="mailto:diane.gilbert@lacity.org">diane.gilbert@lacity.org</a></p> <p><b>Collection Systems Chair:</b>          Nick Arhontes –  <a href="mailto:narhontes@ocsd.com">narhontes@ocsd.com</a></p> <p><b>Water Issues Chair:</b>          Roger Turner –  <a href="mailto:turnerr@emwd.org">turnerr@emwd.org</a></p>
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showing critical service equipment or process tanks containing hazardous materials. SCAP Air Committee members will continue to track this issue.

### **SCAP Proposal to SCAQMD Requesting a Rule 219 Exemption from Permitting for Small Carbon Canisters Used to treat Foul Air or Digester Gas**

On May 5, the SCAQMD will hold a public hearing to amend Rule 219, which exempts certain equipment and processes from permitting by the SCAQMD. SCAP, on behalf of member agencies, has submitted a request to have small carbon canisters (7.4 cubic feet - 55 gallon drum size and smaller) that passively treat odorous emissions from both foul air and digester gas to be listed in this rule. Currently, there are a number of member agencies that use these carbon canisters to treat odorous emissions from sewage collection systems and other applications where conventional odor control strategies (packed tower scrubbers, etc.) cannot be readily implemented or are infeasible. Most of these applications are manhole applications treating relatively small volumes of air. While SCAQMD Rule 219 staff is supportive of this proposed exemption, SCAQMD management staff is currently opposed. SCAP is continuing to communicate with the SCAQMD in hopes of removing any opposition.

### **SCAQMD Proposed Fee Increases**

The SCAQMD has proposed fee increases that total 10% a year for *each* of the next 3 years. Industry advocates, including SCAP member agencies, have been communicating with SCAQMD management staff regarding this fee increase. While it does not appear that there is sufficient opposition necessary to overturn this proposal, the SCAQMD appears to be amenable to providing some concessions in order to lessen the pain. The concessions could be a commitment to increase permit processing staff to help reduce the permit processing backlog or other proposals. Currently, the SCAP Air Quality Committee is soliciting member agencies with regard to any ideas that could be put forward that may resolve an issue or provide for some relief. If you have an idea, please forward an e-mail to the SCAP office.

### **SCAQMD 2007 Air Quality Management Plan (AQMP)**

The SCAQMD is currently in development of their 2007 AQMP. In recent discussions held at the SCAQMD's AQMP Advisory Committee, the SCAQMD has stated that there will be a 500 ton/day (VOC + NO<sub>x</sub>) shortfall in making an attainment demonstration for ozone in 2020. Because the SCAQMD has had a historical "extreme" non-attainment designation for ozone, the SCAQMD has been able to rely on "black box" [FCAA Section 182 (e)(5)] measures for making their attainment demonstration to the EPA. Black box measures are emissions reduction strategies resulting largely from new technologies or from enhancements of existing technologies that have yet to be identified. These provisions are only available to areas with the extreme non-attainment designation. Typically, an AQMP is comprised of specific control measures where the measure is both specifically described and the enumerated emissions reductions (in tons/day) are identified. When an area has an "extreme" non-attainment designation, it is allowed by the Federal Clean Air Act to use these future "black box" measures. Last June, the SCAQMD was reclassified to a "Severe-17" non-attainment status with respect to the new 8-hour ozone standard. Because of this reclassification, the SCAQMD lost the ability to use the "black box" measures. Because of the identified shortfall in the attainment

demonstration noted above, the SCAQMD is heading towards requesting that EPA re-designate the SCAB an “extreme” non-attainment area. Currently, the SCAQMD is planning to convene a brainstorming workshop where they will bring in national experts to evaluate the emissions reduction shortfall and seek input. The SCAP Air Quality Committee has taken the position that the SCAQMD should go through the exercise of trying to identify all feasible existing measures necessary to make an attainment demonstration and discuss the ramifications with stakeholders prior to requesting an “extreme” re-designation.

### **National Association of Clean Water Agencies (NACWA) Tool for Evaluating Disinfection Alternatives**

The Federal Clean Air Act (Section 113) regulates entities that have the potential for an accidental release of extremely hazardous substances. Chlorine, sulfur dioxide and ammonia are listed (40 CFR 68.130) toxic substances considered to be extremely hazardous. Historically, the wastewater industry has utilized one or more of these compounds as part of the disinfection process for wastewater or reclaimed water prior to reuse or disposal. Today, many but not all wastewater (and water) agencies have switched to alternative forms of disinfection. In 2005, NACWA, under a grant from the Department of Homeland Security, developed a tool for evaluating disinfection alternatives. Should your agency wish to obtain more information regarding this tool, please contact Brian Whittaker of CH2M Hill at 805-371-7817, extension 12 ([brian.whitaker@ch2m.com](mailto:brian.whitaker@ch2m.com)).

### **SCAQMD New Source Review (NSR) Offset Tracking System**

SCAQMD staff recently received a letter from EPA setting forth steps SCAQMD needs to implement before EPA can approve their NSR tracking system, absolutely critical for dealing with the ebb and flow of emission reduction credits in the basin. Emission reduction credits are needed to offset the remaining amount of pollution after a new or modified project installs best available control technology. The emissions credit banks are being squeezed by numerous demands made on them, especially for credits needed for new in-basin electrical power generation projects. These same banks also supply the credits needed by essential public services including wastewater treatment facilities. The remedies discussed by staff at a recent meeting to gain EPA’s approval could have significant and deleterious effects on the availability of credits in the basin. Staff will convene a public meeting within a month to discuss their plan of action. The SCAP Air Quality Committee will follow this closely.

## **Collection Systems** by Chair Nick Arhontes

### **Proposed Statewide WDR**

On May 2, 2006, the SWRCB will meet in Sacramento to consider adopting the proposed statewide WDR. If adopted, this new regulation will set minimum performance standards for all publicly owned sanitary collection systems in the state by requiring each agency to develop and implement a site specific Sewer System Management Plan (SSMP). Additionally, a new statewide electronic spill-reporting program would be adopted at the same meeting. Under this

program, SSOs would be reported via the Internet to a state maintained database. Several CSC members have been active in the state's SSO Guidance Committee, which assisted in drafting the new regulation. We also helped with beta phase testing of the online reporting system and provided suggestions for improving it.

The CSC has also held several informational workshops throughout southern California to disseminate information on the status and requirements of the proposed WDR. The last one of these workshops was held on March 13, 2006 in Alhambra at the request of SCAP member agencies LACSD and LACDPW. On July 20, 2006, SCAP/CWEA will hold a Collection Systems WDR workshop in San Diego at the San Diego Metropolitan Wastewater Facilities. The San Diego workshop will be jointly sponsored by SCAP and the CWEA San Diego Section and will provide information on the (newly adopted) statewide WDR and suggestions and resources on how to achieve compliance with the requirements and its milestone-based timetable. Flyers announcing the event and the topics to be presented will be sent out as soon as the details are finalized. CWEA contact hours will be provided to CWEA Collections Grade I – IV certificate holders.

### **SCAP Collection Systems Committee Meeting – May 25, 2006**

CSC members - please mark your calendars for the upcoming CSC meeting scheduled for May 25, 2006 from 11:00 am till 3:00 pm at OCSD. The main topics of discussion will be the statewide WDR and what the CSC can do to assist sewerage agencies in understanding their responsibilities and what programs are needed for compliance under this Order. The SCAP staff will be sending out a draft agenda for comment by mid May. Please note that RSVPs to the SCAP office for this meeting are requested by May 12<sup>th</sup>.

### **Other Upcoming Events**

On July 20, 2006, SARBS/CWEA will hold another Collection Systems training workshop in Huntington Beach at the Huntington Beach Library. For additional information, go to the SARBS website at [www.cwea.com](http://www.cwea.com), see all their local sections statewide, and click on SARBS.

You may also want to order a study guide from CWEA for preparing for your favorite Collections Grade I – IV exam.

**Inland Empire Utilities Agency Profile**

**Headquarters:** Chino  
**Established:** 1950  
**Employees:** Approximately 300  
**Service Area:** IEUA's 242 square mile service area is located in the southwest corner of San Bernardino County, approximately 35 miles east of Los Angeles, and provides regional wastewater service and imported water deliveries to eight contracting agencies.



**Treatment Facilities:**

- Recycling Plant No. 1: Capacity of 44 mgd
- Recycling Plant No. 2: Solids treatment in conjunction with Carbon Canyon Water Recycling facility and the Recycling Plant No. 5 facility
- Recycling Plant No. 4: Capacity of 14 mgd (expansion under construction from 7 to 14 mgd)
- Recycling Plant No. 5: Capacity of 15 mgd, upgradeable to 60 mgd of wastewater and 68 mgd of solids
- Carbon Canyon Water Recycling Facility: Capacity of 11.4 mgd
- Chino 1 Desalter: Produces 14 mgd of high quality drinking water serving 35,000 families and 2 mgd of brine discharged to ocean (SAWPA SARI system)

In July 2004, the Inland Empire Utilities Agency became the first public agency in the United States to receive the Platinum rating from the U.S. Green Building Council's Leadership in Environmental and Energy Design for its administrative headquarters. IEUA built an environmentally friendly headquarters that takes water and energy conservation to new levels. While the headquarters' 66,000 square-feet of office space is equivalent in size to 40 average-sized homes, its energy consumption equals that of approximately three to four average sized homes. "IEUA expects to save 100s of thousands of dollars each year in energy costs alone," said Richard Atwater IEUA's CEO/GM.

Recognizing that water recycling is an essential component of a sustainable regional water resource management strategy, IEUA implemented an aggressive program to design and construct a Regional Recycled Water Expansion Program that will make it possible to distribute 70,000 acre-feet of recycled water annually by 2010. IEUA is also addressing the needs of its rapidly growing population by enhancing its groundwater basin with the ability to recharge storm water, imported water from Northern California and local recycled water. This \$40 million project is a partnership between IEUA, Chino Basin Watermaster, Chino Basin Water Conservation District and San Bernardino County Flood Control. "This landmark water supply program will increase our region's ability to recharge our groundwater basin with over 100,000 acre-feet of new water supplies annually," said Atwater. The Phase 2 expansion of the groundwater recharge facilities is under design and will be completed by 2008 (approximately \$11 million).

IEUA, in partnership with the Los Angeles County Sanitation Districts, has built a state-of-the-art compost manufacturing facility (approximately \$55 million construction costs that will process about 150,000 tons of biosolids annually). "This facility will manufacture exceptional quality compost, which will be good for the soil, good for plants and good for the environment while protecting public health," said Atwater. "The plant will be in start-up operations this June."

IEUA also operates a 'dairy waste to energy' digester (about 3 megawatts) that converts manure to methane gas and then uses this renewable fuel to power the Chino 1 Desalination Plant and IEUA's Water Recycling Plant No. 5. "By picking up and transferring the local dairy manure to an enclosed plant for processing significantly reduces the release of methane gas into the atmosphere as well as protects our groundwater."

## Water Issues by Chair Roger Turner

### Total Residual Chlorine Draft Policy April 2006

Well, there is plenty to report on the State Water Resources Control Board's (State Board) Total Chlorine Residual Policy for California. The Total Residual Chlorine (TRC) is set at 0.019 mg/L for a one-hour average and at 0.011 mg/L for a four-hour average. The Chlorine - Produced Oxidants (CPO) in saltwater is set at 0.013 mg/L for a one-hour average and at 0.0075 mg/L for a four-day average. The comment period closes June 5, 2006 and the State Board will hear public testimony on June 19, 2006 at 10 am. Note that the revised policy looks remarkably like the previous draft policy.

Continuous monitoring will be required to measure chlorine residual concentrations. Online chlorine residual devices must have the ability to record measurements every minute and record concentrations in the parts per billion. The State Board is aware and has been provided documentation that many manufacturers of these devices cannot reliably measure chlorine residual down to the newly required levels in parts per billion. This may create a significant problem for discharging agencies because many may not be able to show compliance with the new policy. To partially resolve this issue, the State Board provides an alternative that allows for measuring and reporting a positive dechlorinating agent residual. This presumes that the chlorine residual would be at zero.

The new policy also allows for a Regional Board to grant a *mixing zone* for total residual chlorine discharges. This would be an individual and discretionary decision by a Regional Board.

Read the new policy at <http://www.swrcb.ca.gov/iswp/chlorine.html> and provide comment to the SCAP office and the State Board by June 14, 2006. SCAP will prepare a comment letter and present it to the State Board by the June 5, 2006 deadline.

### State Implementation Policy Compliance Schedule Sunset Date

The U.S. EPA adopted the California Toxics Rule (CTR) with a regulation authorizing the use of compliance schedules per 40 Code of Federal Regulations part 131.38(e). The regulation limits compliance schedules to existing dischargers and prohibits Water Boards from issuing a schedule that exceeds five years from the date the permit issuance, reissuance, or modification, whichever is sooner. The U.S. EPA approved the five-year compliance schedule provisions in the State Implementation Plan (SIP) with a sunset date. The sunset date is May 18, 2010 unless EPA amends the CTR to authorize compliance schedules extending beyond this date.

### The California Integrated Water Quality System (CIWQS)

Several member agencies continue to wrestle with the California Integrated Water Quality System (CIWQS) program. The program is not performing as well as it should. Several agencies have entered data and found problems with computing and the report results. The State Board staff is aware of the problems and continues to work on them. As reported last month, this program is designed to track information, manage permits and other discharge orders, track inspections, and manage violations and enforcement activities. CIWQS includes

an electronic Self-Monitoring Report (e-SMR) tool for submission of monitoring reports via an Internet web site.

The State Board is conducting training for discharge agencies in Regional Board No. 4 (Los Angeles). We are waiting for the results to understand if the previous program issues have been worked out. More next month.

To get help with CIWQS, call (866) 79- CIWQS (2-4977) or visit the web site at <http://www.swrcb.ca.gov/ciwqs/index.html>.

**Biosolids** by Chair Diane Gilbert

### **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 Scoping meeting was held on February 17; several SCAP member agencies attended the meeting. The written comments were due March 6. SCAP, along with several member agencies, provided written comment letters on the NOP to the Kern County Planning Department. The agencies stated in their letters that they would be submitting documentation for inclusion in the administrative record for the EIR.

Kern County asked SCAP, along with the other plaintiffs in the Class B lawsuit, to allow them to delay the EIR preparation process until after the June 2006 election. The plaintiffs responded that they did not have authority to delay the EIR process because this was a mandate established by the courts. Kern County has forwarded a similar request to the courts seeking a delay of the EIR. The County is in the process of selecting a consultant to prepare the EIR and will be submitting this information to the Board of Supervisors in May for consideration and approval.

A lawsuit was filed against the biosolids ballot initiative claiming that the language for the ballot petition should have been published in Spanish. The plaintiffs were two drivers that transport biosolids. The suit was heard in Fresno and the judge stated that he would not make a decision until he could review all the information provided in the case. The plaintiffs subsequently withdrew the lawsuit.

### **Biosolids Committee Meeting on Regional Capacity to Manage Biosolids**

A Biosolids Committee meeting was held on April 19<sup>th</sup> at Orange County Sanitation District. The meeting focused on regional capacity to manage biosolids within Southern California and Arizona, and how this capacity will be impacted if the June 6th Kern County ballot initiative passes and becomes effective. The meeting was meant to be an open discussion on how much capacity exists today, the quantity of biosolids being managed currently, and steps needed to preserve this capacity. To allow for a more informative session, the biosolids management contractors who operate existing land application sites or composting facilities were also invited to participate. The meeting was very well attended, and the committee



members and contractors provided positive feedback on both the format of the meeting and the exchange of information and ideas that resulted.

### Upcoming Events

WEF and EPA are sponsoring an upcoming Pacific Southwest Organics Residuals Symposium, to be held in Sacramento on July 12<sup>th</sup> through July 14<sup>th</sup>. The Symposium will focus on the innovative treatment and uses for organic residuals in the western states. Topics include the development and marketing of innovative uses of biosolids, manure, green waste, and other organic residuals, as well as regulatory and siting challenges. For more information and to download the conference brochure, go to

[http://www.wef.org/NR/rdonlyres/0C1F5186-C926-4025-8B5C-207FD297302B/0/Organics\\_Residuals\\_Brochure.pdf](http://www.wef.org/NR/rdonlyres/0C1F5186-C926-4025-8B5C-207FD297302B/0/Organics_Residuals_Brochure.pdf)

There will be a joint SCAP/Tri-TAC Biosolids meeting in Ontario on May 11, 2006. More information will be provided in a future SCAP *Alert*.

### **Regulatory Affairs** by Regulatory Affairs Consultant Mary Jane Foley

*Affirmative Defense* – so hard to come by as new regulation and legislation is rolling out.

What is affirmative defense? Affirmative Defense (Source: Google): a defense in which the defendant introduces evidence, which, if found credible, will negate criminal or civil liability, even if it is proven that the defendant committed the alleged acts. Self-defense, insanity and necessity are some examples given for affirmative defense. In the fact sheet that accompanies the SSO WDRs that are mentioned further on in this report, it states “an affirmative defense is a mechanism whereby conduct that otherwise violates a WDR or permit requirement will be excused, and not subject to an enforcement action, under certain circumstances.” We all know that unforeseen vandalism, extreme wet weather, and acts of God happen and it is legitimate to advocate strongly for an affirmative defense for unavoidable SSOs. In my 20 years of experience as a Waterboard Regulator, I would define affirmative action as a common sense enforcement approach to deal with something that was unpreventable beyond the control of the regulated entity and not subject to punitive penalties. The EPA and the environmental groups do not agree. Also, the Clean Water Act strictly prohibits the discharge of untreated sewage into waters of the U.S.

This past month, affirmative defense has been a hot topic both with the pending draft order for the Statewide General Waste Discharge Requirements for Wastewater Collection System Agencies (SSO, WDRs) and in pending legislation on air emission violations. The draft SSO WDR order has two prohibitions: 1) Any SSO that results in a discharge of untreated wastewater to the water of the United States is prohibited. 2) Any SSO that results in a discharge of untreated wastewater, which creates a nuisance as defined in the water code 13050 (m), is prohibited.

SCAP and the POTW organizations around the state have petitioned the Waterboard both in task force meetings, written comments and oral presentations at a Board workshop, indicating that unpreventable SSOs will happen and there needs to be a limited affirmative defense.

So what should you be doing if you have an unpreventable spill? A few basic points would be: 1) Read and understand the new regulation and train all staff to know and understand how to be in compliance with the new requirements, including electronic reporting; 2) Demonstrate that you are enrolled in the program; 3) Demonstrate that you are in compliance with all of the conditions of the order in the timeframe required; 4) Demonstrate that you are complying with the requirements for reporting, developing and implementing a sewer system management plan; 5) Have proof of no feasible alternative; and 6) Prove that all feasible steps and necessary remedial actions were taken. All of this will be in the SSO Order, which should be available soon after the Order is adopted in May. The factors that must be considered during any civil enforcement proceeding are outlined in Section D.6 and 7. SCAP will send you the final order soon as it is available. Ideally, if your organization can show you are doing everything possible to be in compliance, you will be eligible for what is called enforcement discretion by the Regional Waterboards.

This sewer system overflow program has been a high priority with federal and state regulatory agencies for a long time. Some Regional Boards already have a similar program in place. This statewide effort is an effort to bring some consistency throughout the state. There will be more information on training and how to comply as the year progresses. This report is just to let you know that SSO WDRs are now "real" and officially rolling out in May.

I mentioned that affirmative defense was also a part of some pending legislation on air emission violations at the Capitol. The challenges are similar. It takes a lot of education to help legislators understand that some things are unpreventable and huge penalties do not always match the violation. CASA takes the lead on legislation but SCAP weighs in to support the POTW positions from the Southern California regional base.

Finally, this past month I took the opportunity to meet with Joan Denton, the Director of the Office of Environmental Health Hazard Assessment, OEEHA. I wanted to let her know that SCAP would like to work with her organization on new a criterion that has been mandated for health risk assessments and defining how to do cumulative impacts assessments for air quality issues.

### **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](mailto:mfoley@scap1.org).

### **Non Sequitur**

Results! Why, man, I have gotten a lot of results. I know several thousand things that won't work.

**Thomas A. Edison**