



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

MONTHLY UPDATE

A Message from the Executive Director...

June 2006

How many of you know how to play poker? Even if you don't, you've probably watched it on television recently, since it's on at least 15 different channels every night. Or so it seems. One of the things I first noticed about the game is that nearly everyone wears dark glasses while playing. I'm told this is to hide the player's eyes so that it's hard to tell when they're bluffing. [Editor's Note: That's a polite way of saying they're lying.] Sometimes I get the impression that our local weather personalities should also be wearing dark glasses, so we will know when they're bluffing. I mean, how hard can it really be to predict whether or not it will rain in the next 24 hours? I've been holding off for three days now to wash my car because they've been predicting rain. What really gets me is when it doesn't rain and every excuse in the book comes out. "Oh, the storm stalled," "It hit further to the north," or my favorite, "There's a cut-off low associated with the storm making it impossible to predict." [Editor's Note: Obviously, John has been inside too long.]

While I'm on this subject, I'm sure most of you have seen the newspaper headlines recently relating to California's abundant rainfall, such as: "Dealing with the deluge," "Fresno rain in March-April third highest since 1878," "State's water gauge points full," "Sierra Nevada snow levels at 180 percent of normal," and so on and so on. In reality, according to the National Weather Service, Los Angeles has only received 12.34 inches of rainfall this year, which is still 2.38 inches below normal. Wasn't it only yesterday that the U.S. Water News headlined, "Drought looms in remote areas of Southern California?" (Actually, it was April 2002, but it seems like yesterday.) The article goes on to say that so far this season, Southern California has received just one-third the amount of precipitation it normally relies upon, according to the State's Department of Water Resources. More recently, an April 2005 edition of the Daily 49er reads, "Southern California residents unaware of drought problems. Despite heavy rains that Southern California saw this past winter, water shortage conditions continue to exist and may result in effects to both our environment and our society."

Well, I guess it just goes to show that an enterprising reporter can turn any story into a gloom and doom prediction. In the case of our Golden State's rainfall, it doesn't matter whether it's too much or too little, it still makes for a sensational byline. Much in the same way, I have marveled at the recent articles written throughout the state concerning the proposed ordinance banning the land application of biosolids in Kern County. For months now, I have seen articles and columns passed on to me from Diane Gilbert, SCAP's biosolids committee chair extraordinaire, expounding upon either the implied dangers or the recognized benefits of land applied sludge.

Upcoming Meetings

Air Quality Committee –
Tentatively scheduled for
Thursday, June 22, 10-Noon at
LACSD.

SCAP Board of Directors –
Tuesday, June 13th, 10-Noon at
OCSD.

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

It really doesn't matter which side of California's Mason-Dixon line you reside on, the headlines read: "*Green Acres ain't the place to be,*" North County Times; "*Fresno looks to dump treated sewage on neighboring Kern, even as Kern fights to end practice,*" Bakersfield News; "*Voters seek to block sludge,*" LA Times; "*O.C. needs to find a new place for waste,*" Orange County Register; "*Fresno sludge hangs on,*" The Bakersfield Californian.

Now, I have to believe that your average citizen is not fully up to speed on his/her knowledge of biosolids, or the effects of its application on land. Most of us aren't either. Consequently, the opportunity for the press to influence the public one way or another is tremendous. This is why organizations, such as SCAP, are so vitally important to ensuring that the public receives accurate, truthful information and to educate our regulators and legislators on the economic consequences of their decisions. For these reasons alone, I again urge all of our members who have not already responded to our previous request, to search your ranks for any qualified staff that can assist our SCAP working committees in their relentless pursuit of truth, justice and the American way.

Marvelously yours,

John Pastore

Air Quality by Chair Daniel McGivney

SCAQMD Facility Information Module

The SCAQMD is continuing to move forward with the rollout of a comprehensive database that will provide a large amount of facility permit, emissions and enforcement related data on the internet for public consumption. The latest estimate is that the SCAQMD plans to go live with the database in about 3 weeks (e.g. mid-June or so). So, keep an eye out and when it becomes available, try it out. Be sure to review your facility information to ensure that it is accurate. Report any discrepancies to the SCAQMD as quickly as possible.

SCAQMD Amends Rule 219 to Provide Exemption from Permitting for Small Carbon Canisters Used to Treat Foul Air

On May 5, the SCAQMD amended Rule 219 to exempt small carbon canisters (7.4 cubic feet - 55 gallon drum size and smaller) that passively treat odorous emissions from foul air emanating from sewage collection systems (e.g. manhole applications). The SCAQMD has promised to look at larger systems used to mitigate digester gas releases over the next year. <http://www.aqmd.gov/rules/proposed/r219/PAR219.pdf>

SCAQMD Proposed Fee Increases

The SCAQMD has proposed a 30% fee increase over the next 3 years (~ 10%/year). The fee increase is scheduled for adoption by the SCAQMD's Governing Board on June 2. A hyperlink to the proposed rule is provided: [Proposed Rules and Proposed Rule Amendments](#)

Committee Chair Contact Info

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Biosolids Chair:
 Diane Gilbert –
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Collection Systems Chair:
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Water Issues Chair:
 Roger Turner –
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SCAQMD 2007 Air Quality Management Plan (AQMP)

The SCAQMD is convening an "Air Quality Summit" to discuss strategies and potential ideas for control measures for incorporation into the 2007 AQMP in order to make an attainment demonstration. This 2-day workshop will be held on June 5-6 at the Ontario Airport Marriott Hotel in Ontario. Information on this event can be obtained at the following website:

http://www.aqmd.gov/banners/pdf/aq_summit_agenda.pdf

SCAQMD Proposed Rule 1110.2

If you recall, the SCAQMD initiated an effort last year to revise an existing rule that regulates internal combustion engines. The Proposed Amended Rule (PAR) 1110.2 included a great deal of added monitoring and reporting requirements among other things. During the rulemaking process, the SCAQMD agreed to participate with industry in a number of investigations that might provide data that would assist both industry and SCAQMD to craft appropriate rule amendments. Hence, while these investigations were in progress, the District took a short hiatus in their rule amendment process. Well, the studies are over and reports are under preparation and the SCAQMD is ready to pick up the rulemaking process again. The SCAQMD is expecting to begin convening working group and public workshops sometime in late June (or so). And the rule is currently scheduled to go before the SCAQMD Governing Board at their October 2006 meeting. As soon as the Air Quality Committee has more specific information on this rule amendment, we will update the membership. So, stay tuned!

Plasma Arc Cutting Equipment

Over the last few weeks, some member agencies have made inquiries regarding whether or not plasma arc cutting equipment (and associated emissions control equipment) needs to be permitted by the SCAQMD. The answer depends both upon the equipment rating and whether or not the plasma arc cutting torch is used to cut stainless steel. Any plasma arc cutting equipment that is rated at or above 30 kW is required to have a permit. Additionally, any arc cutting equipment that is used to cut stainless steel is also required to have a permit. This includes any emissions control equipment used with it. If there are any questions regarding the above, please contact the Air Quality Committee for further information.

Collection Systems by Chair Nick Arhontes**WDR**

On May 2, 2006, the SWRCB met in Sacramento and adopted the long awaited and heavily discussed statewide WDR for sanitary sewer systems. All publicly owned systems in the state with over one mile in pipe length will need to "enroll" with the state within 6 months after the date of adoption. The new statewide electronic spill reporting program was also adopted at the same meeting. Large and small SSOs will be reported via the Internet to a state maintained database. The state's current California Integrated Water Quality System (CIWQS) system is being modified for this purpose by the state I.T. staff and their consultant. Several Collection Systems Committee (CSC) members who were active in the state's SSO Reduction Guidance Committee, and who assisted in drafting the new regulation, have tested the product. On the coattails of the standing room only and turned many away event held on March 13 in Alhambra

hosted by SCAP member LACDPW, CSC's next workshop is being planned in July in San Diego. See below for more info.

CWEA will take the lead on training for the new WDR provided a Memorandum of Agreement (MOA) can be executed with the SWRCB by July 1, 2006. In exchange for CWEA's assistance by offering training, the state will extend several of the SSMP implementation deadlines. SCAP has agreed to assist CWEA in developing and implementing the SSMP training within SCAP's jurisdiction. Depending on the extent of CWEA's training program, SCAP may offer additional workshops on SSMP components throughout the year.

CSC Meeting on May 25, 2006

A CSC meeting was held on May 25 from 11:00 am till 2:30 pm at SOCWA in Dana Point. The main topics of discussion were the statewide WDR and what the CSC can do to assist cities and sewerage agencies in understanding their responsibilities and what programs and products SCAP should be helping its members to develop for assisting in their site-specific efforts towards achieving compliance under this Order. SCAP staff will begin posting sample products provided by its members who were part of the Regional Board 8's WDR program. These may be of value to SCAP's current and new members now having to enroll in the state's program and be of value in their compliance efforts.

Upcoming Events

On July 20, 2006, SARBS/CWEA will hold their training conference in Huntington Beach at the Huntington Beach Library. For additional information, go to the SARBS website at www.cwea.com, see all their local sections statewide, and click on SARBS.

Also on July 20, 2006, the SCAP Collection Systems Committee and CWEA San Diego Section will be sponsoring an all day workshop on the newly adopted statewide WDR. This workshop will cover the main components of this new order including:

- How the order will be implemented in Regions 7, 8 and 9
- Capacity Assurance
- Operations and Maintenance
- SSO Emergency Response Plans
- Electronic Spill Reporting
- Condition Assessments – Rehabilitation/Replacement
- Fats, Oils and Grease Programs

Flyers will be emailed with more details and registration information.

The CSC is in the planning stages of offering a half-day to three-quarter day workshop on grants and other funding mechanisms for September 2006 to be located in the Inland Empire.

The next CSC meeting is tentatively scheduled for the fall with a date to be announced.

Valley Sanitary District Profile

Headquarters: Indio

Established: 1925

Service Area: 19 square miles primarily in the City of Indio with small portions in the City of Coachella, an unincorporated area of Riverside County, and an adjacent tribal resort casino.

Connections: 27,900

Employees: 23

Treatment Facilities:

A total of 8.5 MGD treatment capacity with:

- Activated sludge treatment process design for 5 MGD capacity
- Treatment ponds with 2.5 MGD capacity
- Constructed wetlands with 1 MGD capacity



Valley Sanitary Wetlands

In 2005, issued permits for connections increased 12% over the prior year representing a significant jump from the more typical 3% annual growth for connections. The growth spurt has the district looking at significant capacity expansion in the next two years rather than the previously planned 2012 time frame.

“We handled the recent growth through extra capacity in the activated sludge plant and with the constructed wetlands,” said Rex Sharp, general manager. “For longer term solutions, we looked at many options, such as expanding the ponds, the wetlands and the sludge plant. We wanted to see which option worked best for capacity versus cost and for achieving future anticipated discharge limits.”

The plan calls for increasing capacity at the activated sludge plant from 5 MGD to 10 MGD over the next four years. About 6 acres of treatment ponds will be taken off-line to accommodate the expansion. “The advantage is quality of effluent to meet future regulations,” Sharp said. “Pond systems have done a good job but they only treat to the equivalent-to secondary level.”

New circular secondary clarifiers will be built to replace existing rectangular secondary clarifiers, which are slated to become aeration basins to expand aeration capacity.

“The best direction seemed to be to gain as much capacity in the existing activated sludge plant, to convert the existing secondary clarifiers to additional aeration basin and to build additional circulate clarifiers in another location to preserve the layout for future expansion,” Sharp said.

When the plan is implemented, the district will have 22 acres of ponds and 15.2 acres of constructed wetlands. (The district has taken the interesting step of leasing part of its land near the constructed wetlands to the Coachella Valley Wild Bird Center, which rehabilitates injured birds, particularly raptors, with intent to release back to the wild.)

Sharp and his team are also considering what to do with its 30+ year-old zimpro oxidation process, which produces a characteristic odor. “We’re concerned about the system’s remaining life. Our intent is to install anaerobic digesters for the sludge treatment and install some power generation for the digester to try to get some of that energy back. We’re also evaluating continuing to operate zimpro with digesters to enhance digestion.”

Sharp said the district’s staff has responded well to the sudden need to plan for greater capacity.

“They were under the gun with huge growth and we also had an employee of with an extended long term illness,” Sharp said. “They really came together to shift loads and accomplish what needed to be done.”

Sharp said the staff’s performance was reflected in the district’s selection as collection system of the year and plant of the year for their CWEA Colorado River Basin Section. Statewide, the district placed second for collection system of the year and third for plant of the year.

Water Issues by Chair Roger Turner

Total Residual Chlorine Draft Policy April 2006

This is one of the most recent significant regulatory policy issues for SCAP members. As reported last month, the State Water Resources Control Board's (State Board) Total Chlorine Residual (TRC) Policy for California is being 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 on June 5, 2006. The State Board will conduct a public hearing and receive public testimony on June 19, 2006 at 10 am.

Welcome Our Newest SCAP Members

- Carpinteria Sanitary District
- City of Downey
- City of Lancaster
- City of Newport Beach
- City of Pomona
- City of Sierra Madre
- City of Victorville
- Leucadia Wastewater District
- Olivenhain Municipal Water District
- Vallecitos Water District
- Western Municipal Water District

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 19, 2006 deadline.

Low Impact Development – Storm Water Management

Many SCAP member agencies are involved in Watershed Management Programs and TMDL development. On January 20, 2005, the State Water Resources Control Board adopted sustainability as a core value for all California Water Boards' activities and programs, and directed California Water Boards' staff to consider sustainability in all future policies, guidelines, and regulatory actions.

Low Impact Development (LID) is a sustainable practice that benefits water supply and contributes to water quality protection. Unlike traditional storm water management, which collects and conveys storm water runoff through storm drains, pipes, or other conveyances to a centralized storm water facility, LID takes a different approach by using site design and storm water management to maintain the site's pre-development runoff rates and volumes. The goal of LID is to mimic a site's predevelopment hydrology by using design techniques that infiltrate, filter, store, evaporate, and detain runoff close to the source of rainfall. LID has been a proven approach in other parts of the country and is seen in California as an alternative to conventional storm water management. The Water Boards are advancing LID in California in various ways:

- Regulation through site-specific and general permits;
- Providing advocacy and outreach to local governments through the Water Board's Training Academy and regional workshops;
- Researching how to incorporate LID language into Standard Urban Storm Water Mitigation Plan (SUSMP) requirements;
- Funding LID related projects through the consolidated grants program; and
- Funding through CWA 319 funds to provide for further researching applicability of Impervious Surface Analysis Tool (ISAT) for land use planners and for the California Water and Land Use partnership (CaWaLUP) Center at U.C. Davis.

The Water Boards are key partners of the CaWaLUP, a collaborative effort made up of representative staff from government agencies, non-profits, and academia, which aims to improve how water resource implications of land use are considered in California's local government decisions. For more information, please go to <http://cawalup.usc.edu/>.

The California Integrated Water Quality System (CIWQS)

This CIWQS corner will provide news as it develops. Several member agencies report that they have had no problems with the reporting program and their ability to upload data into the program. However, there are several member agencies who continue to have problems entering data and uploading it into CIWQS. The differences for agencies appear to be the way agencies have developed their Discharge Monitoring and Reporting (DMR) programs and lab data reporting methods. The program is working for some and not for others. The State Board staff is aware of the problems and continues to work on them.

This program is designed to track discharge data and information, manage permits and other discharge orders, track inspections, 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.

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>.

Trihalomethane Human Health Criteria Evaluation

SCAP is participating through CASA in seeking proposals from qualified firms to assist with a trihalomethane human health criteria evaluation and compliance assessment for publicly-owned treatment works (POTW) discharges to effluent dependent waters (EDWs). The RFPs should go out shortly.

Regulatory Affairs by Regulatory Affairs
 Consultant Mary Jane Foley

The Governor has been very busy this month with new appointments to his administration. As you may have seen in an FYI from SCAP, we have a new Secretary of CalEPA, Linda Adams. I have known Linda for nearly 20 years and she is an excellent choice. She has served in many positions including consultant to Senate Agriculture and Water Resources Committee and Assembly Local Government Committee. She was Chief Deputy Legislative Secretary for Governor Davis and served on the Central Valley Regional Water Board. The water board experience will be very beneficial for the SCAP membership because she will be familiar with many of the challenging issues that face water and wastewater agencies.

Two other appointments are for new members to the State Water Resources Control Board: Charles Hoppin, a rice farmer, appointed to the water quality seat and Gary Wolff, an engineer and economist with the Pacific Institute for Studies in Environment, Development and Security. Hoppin has water experience as a member of the Sutter Mutual Water Company Board of Directors. He is a former member of the State Board of Agriculture. Wolff has been a member of the San Francisco Regional Water Board since 2005.

For our members responsible for stormwater management, SCAP is watching a Clean Water Act permit appeal that could set a national precedent requiring numeric pollutant limits in stormwater permits, instead of the best management practices that are currently a part of compliance. The case is a petition for review submitted to US EPA Appeals Board. The case, Friends of the Earth (FOE) and Defenders of Wildlife v. EPA Region III, could be the first to include numeric limits for stormwater discharges. The State Water Board is also in process of examining the feasibility at numeric limits in stormwater permits. At a State Water Board special session, a panel of stormwater experts was charged with exploring the feasibility of stormwater numeric limits for California. SCAP gave oral and written comments at that session. The EPA decision may influence the SWRCB process on this matter.

The petition argues that EPA Region III's amended permit does not assure compliance with water quality standards because it contains no numeric discharge limits. The environmentalists cite Sections 122.4 and 122.44 in Title 40 of the Code of Regulations to support its argument that EPA is to require limits except where infeasible. They argue that EPA did not show that limits were unfeasible. There is more to this landmark appeal but for now the main reason for

<u>SCAP Associate Members</u>
Brown & Caldwell
CH2M Hill
Dudek
EnerTech Environmental, Inc.
MWH Americas, Inc.
National Clay Pipe Institute
RMC Water & "Environment
SCEC Air Quality Specialists
Synagro West, Inc.
Tetra Tech, Inc.
Woodruff Spradlin & Smart

reporting on this is to let you know we are following this issue closely and will stay involved with the feasibility of numeric limits process in California.

Comments are due in early June for the Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California. Many of our members have worked with the SWRCB staff to make this workable for water and wastewater agencies. We have worked successfully to remove drinking water and coastal discharges from this policy. Inland waters, enclosed bays and estuaries are still affected and must comply. The purpose of this policy is to establish total residual chlorine (TRC) and chlorine-produced oxidant (CPO) objectives to protect aquatic life beneficial uses by adopting USEPA 304 (a) criteria. The policy would also provide consistent procedures that apply to NPDES permits. If you would like a copy of the draft policy, contact the SCAP office.

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

The injustice done to an individual is sometimes of service to the public. Facts are apt to alarm us more than most dangerous principles.

**Lord Mansfield
November 14, 1770**