



SOUTHERN CALIFORNIA ALLIANCE OF  
PUBLICLY OWNED TREATMENT WORKS

# MONTHLY UPDATE

## A Message from the Executive Director...

August 2006

Doesn't it seem like only yesterday that we were talking about how wet it was and would it ever stop raining? Now, it seems we count ourselves lucky if the temperature dips into the 90s. Even for those fortunate enough to work or live near the coast, it's been an exceptionally hot summer already. But for those brave souls who work inland, particularly in the desert areas, the heat can be a major nuisance even if it's a "dry heat." Take, for example, wastewater operations in the Mojave Desert. According to Terry Smith, Plant Superintendent for the City of Needles [Editor's Note: As many of you know, the City of Needles, located on I-15 between Barstow and Las Vegas, boasts the world's largest thermometer, which always reads above 100 degrees. Reminding you that it's really hot out there, as if you didn't already know that.], they have to arrange their working schedule outside to the cooler periods of the day (cooler being a relative term, since it was 114° when I spoke with him). The hot weather also affects the plant processes and requires more solids wasting and higher oxygen levels to maintain proper balance in the treatment process.

### Upcoming Meetings

**Air Quality Committee –**  
Thursday, August 24, 2006,  
10am-12noon at LACSD.

**Joint Collection  
Systems/Water Issues  
Committees Funding  
Workshop –** Wednesday,  
September 27, 2006. Details to  
follow soon. ***Reservations will  
be required and attendance  
will be restricted to SCAP  
members only.***

Speaking of the desert regions, Ray and I hit the road recently to visit some of our existing members, as well as some potential members, in the Palm Springs and Palm Desert areas. What amazing places these are. For those of you who have not been out east on the I-10 and the 111 lately, I suggest you make the trip. What you're likely to see is wind-swept desert surrounded by steep mountain ranges looming in the distance. Adding to the mystique are numerous farms of propeller-driven, wind turbines of gargantuan proportions. These tall turbines stand like lonely sentinels in the foothills above the desert. As you approach the city limits, you will find wide-open spaces with a tremendous amount of new development under construction, both residential and commercial. The area is growing rapidly and is reminiscent of Temecula in its early years.

Spending time there made me appreciate the challenges these agencies face every day in order to provide water and wastewater infrastructure to such a rapidly growing population, especially under such harsh conditions.

Although it will take a while to accomplish, my plan is to ultimately visit all of our member agencies, region by region, even if it's just to stop by and say hello. This will help me get a feel for our members' needs and the problems they face.

It's becoming evident to me that many of our agencies' challenges are determined not only by their size but also by their geographic location. For example, the coastal region agencies must deal with special regulations regarding ocean discharges and are constantly concerned with beach closures. Agencies in the populated northern regions face significant regulatory restrictions and enforcement actions on equipment operation by the local air boards. Those in the eastern part of the state must deal with temperature extremes and strict use attainability requirements for live stream discharges. As for the southern region agencies, I can speak from experience that finding qualified operators who can afford to live within a two-hour's drive is a huge problem. I hope to expand on these regional issues in future newsletters and will be contacting many of you for more specifics.

On an entirely different note, most of you by now have heard that the Memorandum of Agreement (MOA) between the SWRCB and CWEA has been signed and the secondary reporting dates in the SSO WDR have now been implemented. SCAP has committed to work with CWEA to sponsor a series of training workshops over the next 12 months throughout Regions 3, 4, 6, 7, 8 and 9 that will cover electronic reporting and SSMP development. Much of the training will emphasize a "hands-on" approach. Stay tuned for future SCAP Alerts on the training schedule.

Lastly, I am pleased to announce that Dudek has generously offered Ray Miller's services to SCAP for another year at no additional cost. Dudek's President, Frank Dudek, strongly believes in the value of SCAP to its members and is committed to assuring its success. I am sure Ray's continued contribution will be greatly appreciated and most assuredly utilized.

Scorchingly yours,

John Pastore

## **Air Quality** by Chair Daniel McGivney

### **SCAQMD Proposed Amended Rule (PAR) 1309.1**

The SCAQMD is proposing to amend New Source Review Rule 1309.1 (aka the Priority Reserve) on September 8, 2006. The amendments would allow biosolids processing facilities that are constructed off a POTW site to qualify for emissions reduction credits (ERCs), a goal of SCAP for the past two years. The credits are used in conjunction with best available control technology to offset a project's emissions down to zero, a federal Clean Air Act (CAA) requirement. Credits are also being made available to proponents of in-basin power projects causing a potentially very significant drain on credits from the Priority Reserve bank. SCAP is meeting with staff to seek to change proposed language that would significantly discourage a POTW from contracting out the operation of a biosolids facility to a private third party, thereby hindering a possible cost effective operation in certain situations.

**San Joaquin Valley APCD Threatens Non-equivalency Finding**

Emission reduction credits, as discussed above, throughout the state of California are rapidly drying up or are simply not available. To make matters worse, several air districts are in jeopardy of EPA determining that their ERC generation methodologies are less stringent than what the federal Clean Air Act requires. The most significant aspect of this determination is whether or not the credits are "surplus," i.e., that they represent emissions reductions beyond what is already required by the federal Clean Air Act. The San Joaquin Valley APCD is a high profile air district that recently issued a notice that it would probably fail to demonstrate equivalency of its ERC program with the federal CAA for NOx. At the very last minute, the project causing the issue to arise was delayed, allowing the SJVAPCD to show equivalency for this year. Next year is anyone's guess. How EPA handles the situation in the Valley will be a guidepost for the remaining 34 air districts in the state.

**Full Agenda for NACWA Air Committee Meeting in Seattle**

The Air Quality Committee had a full agenda on July 18 at NACWA's summer annual meeting in Seattle, Washington. The agenda focused on federal topics released on proposed or final rulemakings in the *Federal Register* over the past six months or so. The agenda items included a) the proposed New Source Performance Standard (NSPS) for spark ignited internal combustion engines (NSPS Subpart JJJJ) issued simultaneously with a revised NESHAPS standard for reciprocating internal combustion engines (Subpart ZZZZ). Both standards combined impact well over a 100,000 engines across the U.S., b) proposed Title V umbrella monitoring rules, c) a final rule for startup, shutdown and malfunction plans required per the General Provisions of the NESHAPS, d) a proposed rule for leak detection and repair alternative work practice (a component of Subpart VVV of the POTW MACT standard), e) a NSPS for Stationary Gas Turbines (40 CFR Part 60 Subpart KKKK), f) interesting residual risk proposal options discussed for the SOCMIHON NESHAP, and g) a final NSPS rule of compression ignition ICEs (Subpart IIII).

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| <p><b><u>Committee Chair Contact Info</u></b></p> <p><b>Air Quality Chair:</b><br/>Dan McGivney –<br/><a href="mailto:dmcgivney@emwd.org">dmcgivney@emwd.org</a></p> <p><b>Biosolids Chair:</b><br/>Diane Gilbert –<br/><a href="mailto:diane.gilbert@lacity.org">diane.gilbert@lacity.org</a></p> <p><b>Collection Systems Chair:</b><br/>Nick Arhontes –<br/><a href="mailto:narhontes@ocsd.com">narhontes@ocsd.com</a></p> <p><b>Water Issues Chair:</b><br/>Roger Turner –<br/><a href="mailto:rogerwturner@charter.net">rogerwturner@charter.net</a></p> |
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Summary analyses of all of these rules were discussed at the July 26 meeting of the SCAP Air Quality Committee.

**SCAQMD PAR 1110.2**

The SCAQMD is getting ready to start-up the rulemaking process again. Currently, the rule is scheduled for an October hearing, but we have received unofficial word from the SCAQMD that the hearing will be postponed to the November Board meeting. Regarding the field work done by the Industry Stakeholder group, the field work portion is complete and reports are now

being generated. There were 3 tasks, one to evaluate engine emissions monitoring frequency with a portable analyzer, one to evaluate the latest technology in air to fuel ratio controllers and one to evaluate whether or not portable electro-chemical emissions analyzers could be used as a lower cost continuous emissions monitoring system (CEMS). All three reports should be complete by the end of August.

## **Biosolids** by Chair Diane Gilbert

### **Kern County Ballot Initiative (Measure E)**

On July 11, 2006, the Kern County Board of Supervisors certified the votes from the June 6, 2006 election. This means that Measure E, the Biosolids Land Application Ban Initiative Ordinance has been adopted and is effective July 21, 2006. The measure prohibits the land application of biosolids and bulk biosolids compost on the unincorporated lands in the County. Biosolids, packaged for routine retail sales through regular retail outlets, are excluded from the ban. The ordinance allows for the existing land appliers to request an extension of time to discontinue such application if special circumstances exist which create a hardship for those who have installed or constructed permanent improvements relating to the land application of biosolids. The appliers have thirty days to submit the hardship extension request to the County from the effective date of the ordinance.

#### **Welcome Our Newest SCAP Members**

City of Chula Vista  
City of Culver City  
City of Encinitas  
Rubidoux Community Services  
District

#### **Associate Members**

Downstream Services, Inc.

### **WERF Report – Study on Reactivation and Regrowth of Fecal Coliform in Centrifuge Dewatered, Anaerobically Digested Sludge**

WERF has scheduled a meeting with WEF, NACWA, and EPA on August 16<sup>th</sup> and 17<sup>th</sup>, 2006 to discuss and plan Phase II of the research on reactivation and regrowth of fecal coliforms. In the weeks following the meeting, all WERF subscribers will be invited to participate in a conference call to receive an update on what transpired at that meeting, and discuss future activities related to this study. The published report is now available online to WERF subscribers at <http://www.werf.us/downloads/pdfs/03CTS13T.pdf>.

## Agency Profile

### Crestline Sanitation District

**Headquarters:** Crestline

**Established:** 1946

**Service Area:** Approximately 23,000 acres in the town of Crestline, east from Saw Pit Canyon to Twin Peaks and north from Rim of the World (Highway 18) to Mile High Park.

**Connections:** 5,234

**Employees:** 23

**Treatment Facilities:**

Huston Creek Wastewater Treatment Plant (WWTP)

A total of 0.7 MGD treatment capacity

Seeley Creek WWTP

A total of 0.5 MGD treatment capacity

Cleghorn WWTP

A total of 0.18 MGD treatment capacity



Formed in 1946 to provide sewer service to the Lake Gregory area, Crestline Sanitation District (CSD) serves 5,234 residential and commercial connections. The existing facilities have the potential to serve 6,500 connections. Approximately one-third of the district area is sewered, with the unsewered area comprised of subdivided tracts, government land and large undeveloped parcels. In these areas, subsurface disposal systems (septic tanks) are used for sewage treatment and disposal.

The district operates and maintains three treatment plants, 90 miles of collection system, a 14-mile effluent outfall line and an effluent disposal site on Las Flores Ranch in Summit Valley.

Over the past 10 years, the resort community of Crestline has experienced an increase in its full-time occupancy from approximately 25 percent to nearly 60 percent. This growth prompted CSD to evaluate its treatment plant services.

Due to its average daily flow hovering around 75 percent capacity, CSD recently budgeted for the expansion of its Huston Creek WWTP with plans to begin work in the next five years.

“We’re now looking at the type of treatment level we can offer. Recycling is of interest; however, this project is far down the road, and we will meet with engineers to discuss our options,” said Kathy Whalen, wastewater operations manager. “In the near term, we’re determining what we have in place and what we need to do to meet the new WDR requirements.”

**Water Issues** by Chair Roger Turner**Total Residual Chlorine Draft Policy July 2006**

This is the latest installment of this important public policy for the Chlorine Residual Policy for California. SCAP collaborated with BACWA, CASA, CVCWA, and Tri-TAC to provide the final comments on the June 30, 2006 version of the "Draft Total Residual Chlorine and Chlorine-Produced Oxidants Policy of California" (June 2006 Draft Policy). Look on the SCAP website for this letter. The State Board has made revisions to the proposed policy, which appears to be designed to address some of the concerns raised by the regulated community regarding the attainability of the proposed objectives and the feasibility of the accompanying implementation procedures.

The regulated community continues to have serious concerns regarding the attainability and technical feasibility of the proposed continuous monitoring requirements for total residual chlorine. The required detection level, accuracy and reading frequency of online chlorine analyzers is not achievable, creating a serious compliance problem. This position was supported during the June 19, 2006 hearing by representatives of both EMA, a firm that specializes in control systems, and Hach, a manufacturer of analyzers. The proposed requirements have not been substantively revised. Clearly, it is not good public policy to impose requirements that are demonstrably infeasible.

The revised policy does, however, provide wastewater agencies with an alternative means of demonstrating compliance by using either continuous monitoring of chlorine residual or dechlorinating agent residual concentrations. The availability of this alternative has alleviated some of our concerns regarding the attainability of the proposed requirements. In addition, the compliance schedule provisions have been clarified to allow time for POTWs to adequately demonstrate compliance before imposition of final effluent limitations. These changes have resulted in a more workable proposed Policy, but one with continued concerns.

SCAP and other industry associations have recommended that the State Board defer the adoption of this Policy to allow formation of a stakeholder group that will work with Board staff to develop a more technically sound and attainable policy.

About 30 comment letters have been received by the State Board. The State Board is reviewing the comments. When they are done, they will direct staff on the next steps in developing this policy. We will send news to you as it develops.

**State Water Resources Control Board Request for Comment on the Storm Water Panel of Experts Report on the Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities**

The State Board has adopted NPDES General Permits for the Discharge of Storm Water Associated with Industrial and Construction Activities. These permits contain language stating that developing numeric limitations is infeasible. State Board staff has convened a panel of experts on storm water issues to examine the feasibility of developing numeric limits for storm water permits. The Panel developed recommendations that the State Board is considering. The

State Board's report is found at <http://www.swrcb.ca.gov/stormwtr/numeric.html>. SCAP sent out an Orange Alert for comments. If you have comments, send them to SCAP.

The State Board is conducting workshops on July 21, 2006 in Sacramento and on July 28, 2006 in Los Angeles at MWD headquarters. When all of the comments and information are in, the State Board staff will make recommendations for adding numeric limits in storm water permits. The industrial permits affect the POTW industry.

Stay tuned to the development and debate affecting this important policy.

### **State Revolving Fund Program**

The State Water Board administers the State Revolving Fund Program (SRF). About \$200 to \$300 million dollars are awarded each year from federal and state funds and the 2005 Revenue Bond Sale. Publicly owned wastewater treatment facilities, local sewers, sewer interceptors, and water reclamation facilities are eligible to apply for financing under this program.

The SCAP Water Issues Committee and Collection Systems Committee are developing a workshop program to present the "How to and all you would want to know" in order to develop your own successful grant proposals under this program. A panel of experts is being developed for this program with a grant consultant and two Regional Water Quality Control Board senior staff members who administer this program. These experts work on proposals and manage this program for the State Water Resources Control Board. They will be able to provide unique insight on the program and assist you with development of your own successful grant proposals. Look for a flyer announcement soon.

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

### **CSC/CWEA Statewide WDR Workshop – July 20, 2006**

On July 20, 2006, the SCAP Collection Systems Committee (CSC), in conjunction with the San Diego Section of CWEA, hosted a very successful workshop on the new statewide waste discharge requirements (WDR). One hundred fifty-five persons from throughout Southern California registered for the workshop, making it the best attended workshop that the CSC has presented to date. There were numerous additional individuals who had a desire to attend but the attendance had to be limited to what the facilities could accommodate. The workshop was held at the City of San Diego's Metropolitan Wastewater facilities.

The CSC would like to thank all of the participants for this workshop who dedicated their time and effort to make this such a successful event. A special thanks goes out to the City of San Diego, especially to Chris Toth, P.E. Deputy Director, Wastewater Division, Metropolitan Wastewater and Rick Donahue, Environmental Management Representative, Wastewater Division, Metropolitan Wastewater (and current President of CWEA, San Diego Section), for being such gracious hosts providing the excellent facilities for the workshop.

There were seven topics covered. The sessions started off with an update of the new WDR. Bryan Brock, P.E. of NexGen Utility Management, who was formerly with the SWRCB staff and author of the new WDR, gave a presentation on the history of the WDR and how it matured to its current status. Victor Vasquez with Region 9, Ken Theisen with Region 8, and Doug Wylie, P.E. with Region 7 all gave presentations on how the new WDR would be implemented and what would happen to any existing WDRs in their respective regions. Michael Flores, HDR, gave a very informative presentation on Operation and Maintenance (O&M) programs and how they related to the new order. Noah Walker, Dudek, gave an insightful presentation on the importance of having, and what factors can affect, adequate collection system capacity. Mark Niemiec, P.E. from Padre Dam Municipal Water District gave an excellent presentation on collection system condition assessment and what role that it plays in your rehabilitation/replacement program. Dindo Carrillo's, Orange County Sanitation District, presentation enlightened everyone on what the new electronic reporting will look like and how it will be conducted. Leo Shempp, Leucadia Waste Water District, gave a very interesting presentation on SSO Emergency Response Plans (SSOERP) and what needs to be considered in developing an SSOERP. Lastly, Mike Giehl with the City of San Diego gave a detailed presentation on the City's successful Fats, Oils, and Grease (FOG) Program and how the City has substantially reduced the number of FOG related SSOs in the City. Nick Arhontes P.E., Orange County Sanitation District and CSC Chair, was the workshop moderator and kept everything on track and running smoothly. Again, on behalf of the CSC, a very special thank you to the speakers and others responsible for making this event the success that it was. Without your assistance, events such as this would not be possible.

### **Joint Committee Funding Workshop – September 27, 2006**

The next workshop on the horizon will be a joint effort of the CSC and the Water Issues Committee. This workshop is scheduled for September 27, 2006 and will focus on funding opportunities. The new WDR stresses that every agency with a collection system must have adequate funding for the operation and maintenance of that system. The current format for this workshop is to have highly qualified speakers give presentations on sewer rates and rate structures; the State Revolving Fund (SRF) loan program; local, state and federal grant opportunities; and close the workshop with an interactive panel discussion on the various types of funding opportunities. Complete information on this workshop, including registration information, will be distributed to the SCAP membership in August.

### **WDR Training Information**

For the latest information on the CWEA training schedule, please go to: [www.cwea.org/ssso](http://www.cwea.org/ssso)

### **CSC e-Group**

As a result of discussions at the May 25<sup>th</sup> meeting, we are working on setting up an e-group among CSC members to serve as a daily help desk type service and info exchange among members. Several CSC members belong to these types of groups for other uses. Revisions to the SCAP website are currently being planned that will include the e-group. More details will be announced as they become available.

**Upcoming Events**

Funding workshop on September 27, 2006 at Inland Empire Utilities Agency. Details to follow at a later date.

The next CSC meeting is tentatively scheduled for the fall with a date and location to be announced. We will attempt to find a transit system convenient location.

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

This month, SCAP participated with other wastewater associations in providing a second round of comments on the Chlorine policy. There continues to be serious concerns with the attainability and technical feasibility of the proposed continuous monitoring requirements for total residual chlorine. We have asked for three additional changes:

- Deletion of the standard method 4500-Cl E
- Elimination of receiving water monitoring in all situations when a single grab sample indicates the presence of chlorine above the effluent level
- Reduction of the frequency of required grab samples during the period that online analyzers are offline from 15 minutes to 30 minutes

I have communicated with the State Water Board staff on their reaction to the comments. They are in the process of reviewing the comments and will be investigating options to address the regulated communities' concerns. This item will not be taken up until late fall or early next year due to the State Board's heavy workload on basin plan amendments for TMDLs. I am optimistic that a resolution will be found that is workable for all parties.

This past month, I had the opportunity to attend the Pacific Southwest Organics Residuals Symposium in Sacramento. The theme was the recycling of non-hazardous organic residual to products and energy. This was very enlightening given the challenges our membership faces with land application of biosolids. There are some interesting biomass energy opportunities and case studies in the US that are cutting edge technologies. Representatives from the State and Regional Board were speakers on the issue of recycling of organic residuals for products and energy. They support efforts to evaluate and promote alternative uses that provide additional protection for water quality.

Last week, the SWRCB staff sent SCAP and other organizations, a recent draft of the standardized permit. They have asked POTWs to consolidate their comments and submit them in the next 6 week period. SCAP will be working with POTW associations statewide to evaluate the permits, give recommendations for improvements and items that need to be added or deleted. The SWRCB and Regional Board staffs are working on how to show data and numeric limits. This is one of the most challenging parts of the standardization process. We will continue to stay very active on this process and keep you informed. To receive a copy of the latest draft, contact the SCAP office and they will provide you with one. We will be asking for your suggestions for improvements and recommended changes in the coming weeks.

On July 21, 2006, the SWRCB had a workshop on the topic of the Feasibility of Storm Water Numeric Limits. There were coordinated comments and a presentation by several areas of the regulated community. No one supported numeric limits. Action levels were the main theme of the day. In the near term, the Blue Ribbon Panel Report on this topic recommended a near-term action, which would be to use action levels as a trigger for follow-up action, not as compliance limits. They also recommended the requirement for the development of dry weather action levels, and the use of the iterative approach. There is a lot to be done in order to identify an adequate approach to establish action levels for dry and wet weather. The outcome of this process will be known in a few months. We are monitoring this for our members involved in storm water management. The SCAP Water Issues Committee has been sent the Blue Ribbon Report on the Feasibility of Storm Water Numeric Limits. If you did not receive a copy, please contact the SCAP office and they will give you the link for finding the report on the SWRCB website. You can also go to [www.waterboards.ca.gov](http://www.waterboards.ca.gov), go to the water quality link and you will find the report.

### **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**

It is by the goodness of God that in our country, we have those three unspeakably precious things: freedom of speech, freedom of conscience, and the prudence never to practice either of them.

**Samuel Langhorne Clemens**