



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

MONTHLY UPDATE

A Message from the Executive Director...

September 2006

Do you feel it? That unmistakable hint of crispness in the air. It can't be anything but the first signs of fall. The weather is cooling down and the nights are bearable again. By and away, fall is my favorite time of year. That means the tuna are biting out in the ocean and football is right around the corner. I get especially excited knowing that the kids are going back to school and I'm not. Don't get me wrong, I think school is great and I wouldn't be where I am today without it. Just don't ask me to ever go back there again.

It's a good thing that most people don't feel as I do, otherwise, we would not have received the overwhelming response to our Collection Systems Committee's workshops recently held in Alhambra and San Diego. Nearly 300 people attended these standing room only sessions and more were turned away due to limited space. It looks as though the state really got everyone's attention this time.

And just like the new fall schedule of programs on television, SCAP is planning a blockbuster season of informative workshops and committee meetings. First on tap is an informational seminar, jointly sponsored by the Collection Systems and Water Issues committees, that is scheduled for September 27, 2006. This program will focus on funding alternatives for public agencies looking for state and/or federal assistance. A knowledgeable group of speakers from both the private and public sectors, including state and regional board staff, will discuss the various grant and loan programs available, as well as tips for developing a sound rate and fee structure. The rigors of complying with Proposition 218 requirements will also be discussed.

Next up, beginning in early November, SCAP will be assisting CWEA with a series of training workshops covering WDR compliance. The workshops will feature a "hands-on" approach utilizing a newly developed training manual and will initially cover electronic reporting and, ultimately, development of the individual SSMP elements. For the latest up-to-date information on the training schedule, go to CWEA's site at www.cwea.org/ssso. A link to this site can also be found on the front page of SCAP's website.

Next February, we plan on conducting a one day conference, in which all of the SCAP committees will participate in a series of short presentations, highlighting those regulations and/or issues that they deem of greatest significance and concern to the member agencies.

Upcoming Meetings

Air Quality Committee Meeting – Thursday, September 21st, 10am-12noon at LACSD.

Air Quality Siloxane Workshop – Thursday, September 21st, 12:30pm-2pm at LACSD. This informational session regarding siloxane issues will immediately follow the Air Quality Committee meeting.

Joint Collection Systems Committee/Water Issues Committee Funding Seminar – Wednesday, September 27, 2006, 8am-3pm at IEUA. **Reservations are required.**

Plans also include incorporating an exhibitors' forum where the Associate members can display their services to the general membership.

Naturally, all of this is in addition to the regular meetings held by the Air Quality Committee, who have been working diligently with SCAQMD to effect rule changes in several important areas, most notably protecting priority reserve credits for essential public service agencies, like POTWs. The Air Quality Committee is also planning an informational session to discuss the effects of siloxane and methods of treatment. This discussion will take place immediately following the September 21, 2006 Air Quality Committee meeting at LACSD. [Editor's Note: Siloxane is a silicone based compound found in fuel supplies, and when used in conjunction with the combustion of landfill and digester gases, leaves a deposit on the internal workings of the equipment, which in turn causes numerous maintenance and emission control problems.] SCAP will also be working towards formulating a consistent meeting schedule for the Water Issues and Biosolids committees.

Speaking of the Biosolids Committee, I would like to take this opportunity to acknowledge and thank Diane Gilbert, SCAP's former Biosolids chair, for all of her contributions to SCAP over the years. Diane has recently taken on additional responsibilities with her long-time employer, the City of Los Angeles Bureau of Sanitation, and we wish her the best in her new assignment. Fortunately, Diane's vice chair, Karen Soares with LACSD, will be assuming the duties of chair, in order to provide direction and support to the committee. Karen will be assisted by Michelle Hetherington from OCSD, who has graciously volunteered to serve as vice chair. We are expecting great things out of this dynamic duo.

The Water Issues Committee is still in a leadership transitional mode and we expect to name a new chair and vice chair sometime this month.

On an entirely different note, I just couldn't let this go by without a few editorial comments. In a recent article in the *San Gabriel Valley Tribune*, entitled, "Aging Sewage Pipes Pollute Nation," the author goes into great detail describing how broken and leaky sewer pipes all over the country are, in her own words, "mysteriously appearing, seemingly at random, swallowing cars, sidewalks and even homes. Here's why: When sewer pipes corrode, dirt falls in. Soon it is whisked away, much like an underground escalator. Whether it is one grain a day, or several teaspoons a day, soon enough, the ground near the pipe – but below the surface – is gone. The next time it rains, voila, instant sinkhole, instant pipe break. And we are often told the sinkhole caused the pipe break and sewage spill instead of the other way around." She goes on to say, "With apologies to Al Gore, broken sewer pipes are the most immediate and damaging threat to our environment – not rising temperatures at the North Pole. It's sewage on our beaches from leaky pipes. Right here in California. Right now."

All I can say to that is "wow." This is typical of the misinformed, sensationalistic journalism that must be dealt with by better communication and education within our industry.

With that said, I will close by apologizing for the error contained in the last newsletter. The world's largest thermometer is located in Baker, California not Needles. Needles is actually located on the I-40 near the Nevada border.

Apologetically yours,

John Pastore

Air Quality by Chair Daniel McGivney**SCAQMD Priority Reserve and Emission Reduction Credit Supply in Jeopardy**

Emissions reduction credits (ERCs) are the principal means used under the federal Clean Air Act to offset emissions remaining from a project after application of Best Available Control Technology (BACT). ERCs for permitting projects are required at an "offset ratio" of 1.2 lbs of ERCs for every 1.0 lb of emissions. Typically, an industry must generate these ERCs themselves by reducing emissions from existing equipment at a given site or they must purchase them on the open market. In 1990, the SCAQMD established the Priority Reserve, a bank of free credits that "essential public services" could draw on without payment of any fee and, in addition, the essential public service would only have to provide offsets at a 1 to 1 offset ratio. A separate and distinct bank, the "community bank," was also established to satisfy the credit needs for small business. Several changes are in the mill which could greatly impact the availability of credits from both banks and especially the Priority Reserve.

First, Proposed Rule (PR) 1315 is scheduled for adoption at the SCAQMD September 8, 2006 Board meeting. After years of negotiation with the EPA, the SCAQMD is finally capitulating by re-vamping the accounting that substantiated the validity of SCAQMD-held ERCs in the first place. In those cases where documentation no longer exists showing the origin of the credit, these credits will be completely deleted from the banks. Some pollutants held by the SCAQMD, like PM10, the rarest of all credits, will experience a 92% reduction in inventory. VOCs will be reduced by 58% from the existing bank levels. For all practical purposes, these lost credits can never be replaced since available credit-generating mechanisms are very few and far between. These Rule 1315 actions only impact the SCAQMD banks and not privately held ERC certificates, which still can be traded in the marketplace.

On the heels of proposed Rule 1315 are proposed changes to the Priority Reserve rule itself, SCAQMD Rule 1309.1. The most significant changes are to open the Priority Reserve to electric generating units (EGUs), in order to offset the emissions from up to 1500 MW of in-basin utility generation to reduce potential electrical power shortages in the basin. As part of these revisions, staff is clarifying that biosolids processing facilities located off the POTW site and owned and operated by a public entity are eligible for free credits. They are also allowing privately-owned biosolids processing facilities to access the Priority Reserve but they, like the EGUs, must pay a significant mitigation fee (e.g. they must pay for the ERCs) and obtain ERCs at a 1.2 offset factor for each pollutant they require. The mitigation fee for a pound per day of PM10, for instance, will cost \$50,000 (as of the SCAQMD's last proposal) but

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recent commercial trades have topped \$80,000 per pound per day. The mitigation fees will increase each year by the increase in the CPI.

Staff, however, is also going one step further and specifying that should a publicly owned biosolids processing facility contract out its operations to a private third party, the public entity must return all credits received from the SCAQMD or pay the mitigation fee in effect at that time, multiplied by the offset factor of 1.2. This last provision could have large repercussions on many SCAP members who might use private operators for a variety of reasons. The Air Quality Committee staff is working hard to formulate amenable protective language including meeting with SCAQMD Board members to improve their understanding of the issue. At one point, one Board member, either not understanding the issue fully or wanting to avoid situations involving possible transfer of equity between public and private entities, thought that *all* credits related to biosolids processing facilities, irrespective of their being publicly or privately owned, should be charged the full mitigation fee. Because of last minute challenges by environmental groups for failure of the PR 1309.1 CEQA documents to address the impacts of the proposed new power plants, major portions of these rulemakings will be delayed approximately four months. SCAP's Executive Director and the Air Quality Committee will continue to birdog the issue to a final conclusion.

SCAQMD Proposed Amended Rule (PAR) 1110.2

The SCAQMD intends to hold workshops in late September or early October. The proposed rule is tentatively scheduled for a November hearing. Of the three stakeholder testing programs completed this past spring, one report on the use of portable electrochemical emissions analyzers in a stationary application has been completed and turned over to the SCAQMD. A second report on performing weekly monitoring on engines with a portable analyzer should be available by the first week of September. The last report on the evaluation of the latest, most technologically advanced air to fuel ratio controllers (AFRC) is expected to be complete by mid-September.

SCAQMD 2007 Air Quality Management Plan (AQMP)

The SCAQMD is currently developing its 2007 AQMP. This is equivalent to a water agency's CIP. The AQMP contains all emissions control measures identified by the SCAQMD that will be implemented during the next few years in support of the SCAQMD's effort to attain federal and state ambient air quality standards. The SCAQMD's AQMP will become part of the State of California's State Implementation Plan (SIP) that is required to be submitted to the EPA.

The SCAP Air Quality Committee has learned that among the many emissions control measures being developed by the SCAQMD, at least two measures could have significant impact on combustion sources. These two control measures are:

- the electrification of engines, small boilers and water heaters, and

- the revision of combustion Best Available Retrofit Control Technology (BARCT) rules to Best Available Control Technology (BACT) standards.

Not much is known about the first measure, but we do know that it will affect permitted internal combustion engines. We just do not know if there will be any thresholds or qualifying criteria that will place a piece of equipment into this program or if it will be more of a blanket type of rule. The second measure will require the SCAQMD to revise existing BARCT rules (R1110.2 for engines, R1146 and R 1146.1 for boilers, R1134 for turbines, R1171 for solvent, paint and coatings and R1179 for sewage treatment plants [i.e., VOC controls on wastewater emissions], to name a few) for emission limits to BACT levels. In the case of internal combustion engines, this would mean controlling engine NOx emissions down to 10 ppm from 36 ppm (corrected to 15% oxygen). This would require an owner/operator to either retrofit an existing piece of equipment with new emissions control equipment, or in some cases, replace the equipment altogether. In either case, it is likely that there will be significant impacts to water and wastewater agencies emanating from the SCAQMD 2007 AQMP. All agencies are advised to review the draft plan when it becomes available and provide appropriate comment.

Air Resources Board (ARB) Proposed Amendments to the AB2588 Air Toxics Hot Spots Program Amendment to Include Diesel PM

The ARB has announced that it intends to present proposed amendments to the AB2588 Air Toxic Hot Spots regulation to its governing board at the November 2006 meeting. The proposal will incorporate the particulate matter (PM) fraction from Diesel exhaust as a formal contaminant that will need to be inventoried, reported and incorporated into the health risk assessment as required by AB2588. Any agency that operates Diesel engines should become familiar with these new requirements and ensure that your agency is complying with them.

The requirements for facilities with only one diesel engine and no other source of toxic air contaminant emissions should be relatively okay, but you will still need to comply with the ARB's stationary Diesel engine airborne toxic control measure (ATCM) implemented in the South Coast Air Basin via SCAQMD Rule 1470. If an agency has more than one diesel engine located at the same site, or one or more diesel engines co-located with other sources of toxic air contaminants, these new requirements could trigger your facility into the AB2588 program which requires a full health risk assessment, public notifications and a health risk reduction program if certain thresholds are triggered. [Also, health risk assessments under AB 2588 are now performed using the "HARP" program that in and off itself could cause a rise in the risk to the most exposed individual, everything else remaining the same.]

We recommend that all agencies review applicable regulations (ARB Stationary Diesel Engine ATCM, SCAQMD Rule 1470, AB 2588, etc.) to evaluate the impact upon your individual agency. As always, the SCAP Air Quality Committee stands ready to assist you in your efforts and/or answer any questions we can.

Biosolids by Chair Karen Soares

Kern County Lawsuit

Los Angeles City, along with a coalition of seven other plaintiffs, including Orange County Sanitation District, Los Angeles County Sanitation Districts, the California Association of Sanitation Agencies (CASA) and biosolids management and hauling contractors, filed a lawsuit Tuesday, August 15th, in Los Angeles County Federal Court, challenging Measure E, Kern County’s voter-approved ban on biosolids land application. The plaintiffs have hired several law firms; including Washington DC based Beveridge & Diamond, who have successfully defended anti-biosolids lawsuits in the past.

The Kern County Administrative Office and Kern County Council are working on drafting a resolution for consideration at the Kern Board of Supervisors meeting on September 12, 2006, to attempt to get other California counties, agencies, and national allies to join together with Kern County in defending the suit.

Measure E was passed in the June 6th election, and became effective July 21st. The Measure enacts an ordinance to ban the application of biosolids and bulk biosolids compost on the unincorporated lands in Kern County. Land appliers have six months to discontinue operations, but may apply for a hardship extension if they have installed or constructed permanent improvements related to biosolids application.

WERF Study on Reactivation and Regrowth of Fecal Coliforms

WERF has published Phase I of a study, indicating that fecal coliforms in digested biosolids were either reactivated or regrew following centrifuge dewatering. The study was conducted by Bucknell University and DC Water and Sewer Authority, and concluded that four of seven treatment plants studied experienced this reactivation or regrowth.

On August 17th, 2006, WERF held a workshop to receive comments on the study and input regarding what direction Phase II of the study should take. There were over 80 participants at the workshop. Some additional research steps suggested for the next four years of the study include expanding the study to as many as 40 plants, verify the DNA-based test method being used in the study and address data variability, look at other pathogens such as Salmonella, and develop an understanding of the mechanisms and conditions that lead to the reactivation or regrowth.

<p><u>Welcome Our Newest SCAP Members</u></p> <p>City of Manhattan Beach Fallbrook Public Utility District</p> <p><u>Associate Members</u></p> <p>J. R. Filanc Construction Co.</p>

Agency Profile

South Coast Water District

www.scwd.org

Headquarters: Laguna Beach

Established: 1932

Service Area: 8.3 square miles in the coastal communities of Dana Point, South Laguna, and parts of north San Clemente and north San Juan Capistrano.

Connections: 17,800 sewer, 13,990 potable water, 170 recycled water

Authorized Employees: 73.5 full time equivalents (retail water/sewer operations)

Sewer Collection Facilities:

- 139 miles of gravity sewer lines
- 3.1 miles of force mains
- 14 lift stations
- 3,408 manholes
- 4 million gallons a day of wastewater conveyed to two regional treatment plants



South Coast Water District General Manager Mike Dunbar, *left*, and Systems Maintenance Operator Jimmy Gomez inspect the sewer line inside of a two-mile tunnel, which was hand dug and blasted from the bluffs in South Laguna more than 50 years ago. (Photo courtesy of David Ohman)

“Prevention of sewer spills is the number one priority for our sewer collection system,” said Mike Dunbar, South Coast Water District General Manager and current President of the California Association of Sanitation Agencies. “Our district goal is zero sewer spills, and our trend is downward from four in 2005 to one in 2006.”

To meet that goal, the District has a preventative maintenance program for its sewer collection system:

- 100% of gravity lines are cleaned annually and necessary repairs are made.
- 100% of gravity lines are video-inspected every five years (20% each year).
- Priority repairs are completed according to schedule and severity.
- 100% of hot spots are cleaned at least quarterly and selected hot spots are video-inspected.
- 14 lift stations are inspected daily and/or weekly and are rehabilitated or replaced according to plan.
- Force mains are surface-inspected weekly, video-inspected annually and relined or repaired as needed.
- Food establishments are inspected for compliance with kitchen best management practices and maintenance of grease control devices.

For many sewer collection systems, this would constitute a complete preventative maintenance program. But not for South Coast Water District. There is one more aspect to the sewer collection system: a unique two-mile sewer line inside of a tunnel, which is buried along the ocean bluffs in South Laguna from Three Arch Bay to Aliso Creek Beach.

“As far as we know, we are the only sewer collection system in Southern California that has a sewer line inside of a tunnel,” said Dunbar. “Maintenance and repair of the line is an ongoing challenge from financial, logistical, and regulatory points of view.

“However, the benefit of having a *gravity* sewer line along the coast is that it eliminates the need for six to eight additional lift stations and associated infrastructure – and that is invaluable from an operational and environmental standpoint,” Dunbar commented.

Built in 1954 in a sparsely populated, unincorporated area of south Orange County, the sewer tunnel today is located in the City of Laguna Beach. The 5-foot wide by 6-foot high tunnel was originally hand dug or blasted from the bluffs, which are mostly bedrock. There are a dozen points of entry, and the interior is largely supported by timbers.

The original sewer line was a 21-inch vitrified clay pipe with mortar joints. In 1974, it was crushed in place and replaced with a 24-inch reinforced plastic (techite) pipe. Today, the pipeline carries 1.1 million gallons a day of wastewater to a sewer lift station near Aliso Creek, where it is pumped to a regional treatment plant. About 80% of the wastewater conveyed originates from the City of Dana Point.

“The pipeline remains in fine working order and has 30 plus years of useful life. However, the tunnel is another story,” said Dunbar. “In certain areas, the tunnel has caved-in, materials have sloughed off, or supporting timbers have rotted or cracked.”

Despite the deterioration of the tunnel, none of the 300 residences on top of the bluff are at risk of caving into or sliding down. It is the sewer line that is at risk of breaking if the tunnel fails, potentially pouring wastewater directly onto the beach and into the ocean before emergency crews can stop the flow.

“We considered many options to address this situation, such as shoring up the existing tunnel, burying the pipeline in it, even replacing the line with a new one under Coast Highway,” said Director of Operations, Joe McDivitt.

“The preferred option is to keep the current pipeline intact, improve the tunnel support system, and make the tunnel a workable environment by enlarging it and moving sections of pipe away from the wall. This way, crews can safely work on the line and have a clear path to move through,” McDivitt added.

The tunnel rehabilitation program is a phased-in project:

- **Phase 1:** The District will first work on 800 feet of the tunnel at Thousand Steps Beach, which shows the greatest deterioration. By year’s end, a protective covering will be installed over the pipeline. By mid 2007, the District will remove deteriorated support beams, enlarge the interior to an 8-foot oval, erect girders, and apply shotcrete to strengthen the tunnel.
- **Phase 2:** The balance of the sewer tunnel (9,250 feet) will be enlarged and the support system improved.

“The tunnel rehabilitation could take up to six years to complete and will cost an estimated \$20-\$25 million,” said Dunbar. To reduce pressure on reserve funds and the need for financing, the District will pursue state and federal funding, since directly offshore from the sewer tunnel are marine life refuges. “One sewer spill from the pipeline could harm protected areas. It could also close beaches to swimmers, surfers, skim boarders and body boarders for an undetermined length of time. We can’t let that happen,” he added.

Collection Systems by Chair Nick Arhontes**Joint Committee Funding Alternatives Seminar – September 27, 2006**

The SCAP Collection Systems Committee (CSC), along with the Water Issues Committee (WIC), is currently in the process of developing its next informational seminar. This seminar will be on funding alternatives and will be held on September 27, 2006 at Inland Empire Utilities Agency in Chino. With the site-specific funding requirement needs that some may need to close gaps on to comply with the newly adopted statewide WDR, the CSC and WIC felt that an informational seminar on funding opportunities would be very beneficial to the SCAP membership from cities and sewerage agencies. The seminar is intended to provide an overview of the various funding opportunities that are available to publicly owned wastewater agencies. The seminar will start off with a presentation by Dave Bruns, LACSD, on Sewer Rates and Fees. He will be followed by Denise Landstedt, Dudek, who will speak on Grant Programs. The final presentation will be given by Christopher Stevens, SWRCB, on the State Revolving Fund Loan Program. The seminar will conclude with an interactive panel discussion comprised of our three presenters and possibly some Regional Board representatives. The panel discussion is intended to give the audience an opportunity to pose specific questions to the panelists about the various funding mechanisms. The seminar is open to anyone interested in funding for public wastewater systems. Registration is at 8:00 am with the program starting promptly at 9:00 am. The cost for SCAP members is \$65.00 and \$90.00 for non SCAP members. For further information, please contact the SCAP office at (949) 489-7676 or info@scap1.org.

WDR Enrollment Deadline

Just a friendly reminder, all publicly owned wastewater collection systems having more than one mile of pipeline must “enroll” with the state by November 2, 2006. This includes paying enrollment fees and filling out a form and some online data. You should have already received your invitation to enroll thru the Notice of Intent (NOI) including the application form. If you have not received your NOI, you are advised to kindly download one at www.waterboards.ca.gov/sso/.

To follow current events of the SWRCB – CWEA MOA program, please see www.cwea.org/sso. Nick Arhontes of the CSC is participating as a subject matter expert on the training product development in his spare time.

Private Laterals

Late breaking news for CSC members is that a ground swell is moving statewide again regarding private laterals and the possible need for some legislation. SCAP will be analyzing this and briefing the SCAP membership soon. More news next month.

Regulatory Affairs by Regulatory Affairs Consultant Mary Jane Foley

This is a frantic month for the legislature. The legislature returned from a month's vacation to take action on roughly 1,500 bills before the August 31st deadline. One of the set of bills that are being watched closely deals with restricting greenhouse gas emissions. Several of the bills that would have an impact on our membership are "dead." The Governor and the legislature did negotiate an on-time state budget and four multi-billion dollar bonds.

I spoke with Mike Dillon (CASA) regarding the joint legislative hearing on Prop 84 held by the Assembly Water Parks and Wildlife and Senate Natural Resources and Water Committee. Mike attended the hearing and I will be assisting him in any way possible to get recognition for the needs of wastewater infrastructure improvements in the mix of fundable projects. We had originally tried in the beginning of the session to do this when the administration had a large bond package that turned into a smaller, less inclusive bond and didn't include financial resources for wastewater. I note that some legislators are earmarking monies for storm water and water pollution. Since POTWs are often called water pollution control facilities, I believe we can make a case for wastewater infrastructure.

This month, John Pastore and I met with some of the leaders on our biosolids committee to brainstorm how SCAP can be proactive in working on some of the many challenges our members are facing with the daunting task of biosolids land application, new technologies, etc. One of the outcomes of the meeting was to renew a strong relationship with the Integrated Waste Management Board. We would like to explore opportunities that would create diversion credits from landfills. We have a new Chair and Co-Chair for the committee and I look forward to a robust year for the Biosolids Committee.

One last good news item to report: The Department of Pesticide Regulation (DPR) has decided to initiate re-evaluation of pyrethroids. The department will notify manufacturers of pyrethroids insecticides that they must share data on their products or those products will be banned from sale in California. The data will drive a regulatory review that could result in restrictions or a ban on specific products. This is said to be the biggest pesticides regulatory effort in the state history. It will certainly help our wastewater treatment system and we applaud Mary-Ann Warmerdam, the Director of DPR for her action.

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

I do not mind lying, but I hate inaccuracy.

Samuel Butler