



SOUTHERN CALIFORNIA ALLIANCE OF PUBLICLY OWNED TREATMENT WORKS

Monthly Update

www.scap1.org

December 2010

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Upcoming Meetings

Holiday Luncheon
12-14-10 @11:30 am
Laguna Niguel Country Club

Air Quality
 2011 TBA

Biosolids
 2011 TBA

Collection Systems
 2011 TBA

Energy Management
 2011 TBA

Water Issues
 2011 TBA

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A Message from the Executive Director...

I hope everyone had an enjoyable Thanksgiving holiday and were able to spend time away from the rigors of work with your family and friends. I would also like to extend best wishes from all of us here at SCAP for a Merry Christmas and Happy New Years. We are looking forward to seeing you at our upcoming annual Holiday Luncheon on December 14th, which will be held at the El Niguel Country Club, immediately following the SCAP Board of Directors meeting.

For some time now I have been expounding the virtues of positive branding for our wastewater agencies and how those in our profession are truly "stewards of the environment". It goes without saying that we all should be proud of our accomplishments, however, many times our efforts go unnoticed by not only the general public but by those of us in the industry. In the coming year I hope to bring attention to many of our member agencies that, day in and day out, make extraordinary contributions above and beyond what is mandated by the regulators.



Tapia Water Reclamation Facility located in Calabasas, California

One such agency fitting of this description is the Las Virgenes Municipal Water District (LVMWD), which can be found nestled in the scenic foothills of the Santa Monica Mountains in northwest Los Angeles County. Serving more than 65,000 residents in the cities of Agoura Hills, Calabasas, Hidden Hills, Westlake Village and portions of unincorporated Los Angeles County, LVMWD provides not only wastewater treatment but also supplies potable and recycled water, along with composted biosolids free of charge to its customers. But more on that later. What makes this district so "special" is the unique way in

which it provides services to its customers, while taking extraordinary care in protecting the surrounding natural habitat.

Let's first start with its General Manager, John R. Mundy. John has been with the District for 14 years, seven of which have been as general manager. With over 30 years of experience, he has spent time working for the City of Ventura and the City of Santa Monica where he gained certification in both water and wastewater treatment operations. Having lived in the area for 24 years has given John an appreciation for being able to work in a locale filled with such unique natural beauty including a wide range of habitats, many of which are contained within the Malibu Creek Watershed. It is this appreciation, along with the support of his very capable staff and Board of Directors, that has helped shape LVMWD's policy of ensuring the protection of the surrounding natural landscape. A working relationship with other watershed entities, such as local Resource Conservation District, the cities of Hidden Hills, Calabasas, Agoura Hills and Westlake Village, community organizations and other stakeholders and the dedication of significant resources towards maintaining and improving the local environment has endeared LVMWD to its customers and neighbors alike.

Since the 1960s LVMWD and their Joint Powers Authority (JPA) partner Triunfo Sanitation District (TSD) made a commitment to improve conditions in the Malibu Creek Watershed and Santa Monica Bay by closely monitoring the Malibu Creek water chemistry and by making significant improvements to the Tapia Water Reclamation Facility (WRF). Most recently The JPA has spent over \$10 million on biological nutrient removal to ensure that constituent levels in its effluent are reduced to acceptable levels prior to discharge into both Malibu Creek and the Los Angeles River. This commitment to watershed stewardship is further augmented by recent projects, including participation in the Resource Conservation District of the Santa Monica Mountains Steelhead Technical Advisory Committee, the Santa Monica Bay Restoration Commission and research in the upper headwaters of the watershed. To protect the biology of Malibu Creek, and especially its struggling steelhead population, the JPA goes to extraordinary measures to regulate the amount and timing of its wastewater discharges and is even considering the construction of future recycled water storage reservoirs to further decrease discharges to the Creek.

As mentioned previously, LVMWD also provides drinking water to its customers and, like many agencies, is completely dependent on Metropolitan Water District (MWD) for delivery of its water supply. In order to reduce such dependency, LVMWD developed a regional recycled water system delivering nearly 60% of its wastewater treatment flow as irrigation to nearby golf courses, parks, highway landscaping and common areas. This amount of recycled water usage within LVMWD and TSD service area has had the added benefit of reducing its dependence on imported water by 20 percent along with subsequent savings to its potable water customers.



Perhaps of all the services that LVMWD provides, none merit the amount of attention or accolades that its Rancho Las Virgenes Community Composting Program does. This is by no means your ordinary composting operation. Begun in 1994, the Las Virgenes Composting Facility, which is owned and operated by the Las Virgenes-Triunfo JPA, is a state-of-the-art, indoor composting facility that converts wastewater biosolids to a nutrient-rich soil amendment. The biosolids are first transported from the Tapia WRF to the composting facility through 4 miles of underground pipelines. After processing the biosolids in two on-site anaerobic digesters, the centrate is subsequently returned to the Tapia WRF for further treatment. The remaining solids are then mixed with woodchips or sawdust to begin the in-vessel composting operation, where the mixture is

then mechanically churned and moved along narrow bays located within the indoor facility. After a minimum of 60 days, the mixture is ready to distribute as a Class A garden compost. LVMWD produces approximately 12,000 cubic yards of material per year and offers the compost product free of charge to its customers and what isn't given away is sold to local commercial users.

It is evident that such a commitment to providing an environmentally friendly product does not come easily or cheaply. It takes dedicated management and a forward thinking board of directors to achieve sustainability in the area of biosolids in this day and age. Fortunately, LVMWD's efforts have not gone unrecognized as evidenced by the following awards received:

- LA area EPA Plant of the Year awards for 1995 & 2003
- CASA Excellence in Community Outreach for Compost and Biosolids processing 2004
- US EPA clean Water Act Recognition Award for Exemplary Biosolids Management and Public Acceptance Activities 2006
- AWWA Sandor C. Csallany Institutional Award for Exemplary Contributions to Water Resources Management 2004
- CASA Public Outreach/Education for 50 Ways to Save Water 2009



Free Compost Giveaway Program

LVMWD's devotion to stewardship doesn't end there, as it continues to provide its customers with water conservation programs, including landscaping workshops, rebates for water-saving devices, distribution of low-flow shower heads, educational programs, facility tours, in-class presentations, exhibitions and periodic newsletters.

Congratulations to Las Virgenes MWD as a leading example of what our agencies can accomplish while serving its customers and protecting the environment.

Seasonally yours,

John Pastore, Executive Director

Committee Reports



Air Quality

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CWCCG Update by Kris Flaig, City of Los Angeles
Bureau of Sanitation

You would think that other months would not be as busy as the past 30 days in terms of getting out

comment letters, or that there'd be a reason for the focus that encourages such production. And, you'd be correct on both accounts.

It seems to be an endemic cycle that the regulatory agency executives optimistically promise their boards significant, maybe necessary, production. Every year, staff production (to keep up with executive plans) may be delayed by generous, and occasionally kind, critiques by the regulated community (i.e., us). This year we have been a little busy with reading and writing comments. Anyone, like me, who is on vacation for any part of the holidays, may miss last-minute regulatory proposals.

The California Wastewater Climate Change Group (CWCCG) has taken the opportunity to comment on

Climate Change and Renewable Energy issues. We (Jackie Kepke and our many active members) have written a letter to the California Public Utilities Commission (CPUC) in support of public utilities, like SoCal Gas and SDG&E to get in the business of contracting with owners of digas and landfill gas producers to install, own, maintain, and/or operate installations to provide pipeline quality Biomethane (PQM). In the same letter, we pointed to wind and solar incentives and asked for similar treatment.

In a letter to the California Energy Commission (CEC), we argued for broader definitions for digester gas and renewable energy credits (RECs). We also stipulated that self-generation entities, like POTWs, should be allowed to retain and sell RECs, and that extensive certification requirements for "RPS-eligible" facilities are counter productive. We noted that a new definition of "green attributes" was really a policy statement that burdens biomass and biogas facilities with unfair trading rules.

On USEPA's PSD and Title V Permitting Guidance for Greenhouse Gases, we argued that BACT should be limited to on-site equipment - not off-site emissions, biogenic emissions should be excluded from applicability determinations and permit limits, the Guidance should be clear that avoidance of public health impacts takes priority over GHG reductions, collaboration between permittee and permitting authority is important but must be managed reasonably, and protocols are needed to establish potential to emit GHGs.

Last, but not least, the CWCCG has commented numerous times on the Cap & Trade (C&T) Program, whether in the form of CPUC economics or an actual CARB C&T draft. You are encouraged to attend the SCAQMD Home Rule Advisory Group's Climate Change Subcommittee Meeting at 1 pm on December 8 in Diamond Bar to get the latest and greatest from a key CARB staff as well as a few comments from our local experts.

Please take a moment to thank the CWCCG consultant, Jackie Kepke (CH2M Hill), and the many members who continue to diligently sift thru regulations, rules, guidance, and legislation on our behalf. It's not usually glamorous. And, maybe that's why their experience and dedication bring professionalism to a new level.

So, on the eve of a new era of air regulations, capped by GHGs, my weather report is for whirlwinds along the beltway, a mild tempest is building off the west coast, while sunny skies are seen over Southern California and thought to be seen over D.C.

Imperial County APCD

www.co.imperial.ca.us

The Imperial County APCD has a new website in operation and CAPCOA's newest Greenhouse Gas document "Quantifying Greenhouse Gas Mitigation Measures" is now available on the website under CEQA.

Imperial County APCD has announced that a copy of both the Final 2009 Imperial County State Implementation Plan for PM₁₀ (2009 PM₁₀ SIP) and the Final Negative Declaration for the 2009 PM₁₀ SIP are now available on the District's website.

There are currently no new public workshops, hearings or meetings posted on the ICAPCD website for the month of December 2010.

Mojave Desert AQMD

www.mdaqmd.ca.gov

For those interested in solar power, the MDAQMD website includes a real time display of daily and yearly solar power information from within the district, as well as the amount of carbon dioxide saved.

MDAQMD has also introduced ENVIROFLASH on its website, which provides air quality forecasts directly to your computer's inbox.

There are no meetings of the MDAQMD scheduled for December 2010. There are no new workshops or public hearings shown on the MDAQMD website for the month of December 2010.

San Diego APCD

www.sdapcd.org

San Diego APCD reports it has completed and submitted its Ambient Air Monitoring Network Plan (AMNP) for 2007 and a copy can be obtained from their website. SDAPCD will be required to submit an Air Quality Plan to EPA in 2013 outlining the emission control regulations necessary to bring the entire region into attainment.

SDAPCD has added a custom Google search engine exclusively for their website and also offers an interactive air pollution simulator program called **Smog City 2**. This program will allow the user to make decisions that affect the air quality and can then view the resulting changes that occur.

The SDAPCD is currently in the process of applying with CARB to become a Greenhouse Verification Body. If approved the verification services will be offered by contract.

The next APCD Board meeting is scheduled for December 8, 2010. The next Hearing Board meeting is scheduled for December 9, 2010

Santa Barbara APCD

www.sbapcd.org

The Santa Barbara APCD reports that they have a new fee schedule in effect as of 7/01/10, which can be viewed on their website. SBAPCD also reports that they are working with CAPCOA planning managers to develop GHG emission thresholds for CEQA reviews of new projects.

The SBAPCD, as Lead Agency under CEQA, will prepare a Draft EIR for the 2010 Clean Air Plan (2010 Plan for Santa Barbara County).

The next APCD Board meeting is scheduled for December 16, 2010. There are no workshops or hearings scheduled for the month of November at this time. There is a Community Advisory Council meeting scheduled for December 8, 2010

Ventura County APCD

www.vcapcd.org

VCAPCD currently has application forms available for the Carl Moyer Program. The program will provide approximately \$2 million of grant funds for projects within Ventura County. The grant funds are available to qualifying owners of heavy-duty diesel powered equipment that want to reduce air pollution by upgrading or replacing their present equipment.

The VCAPCD reports that the Draft 2009 Reasonably Available Control Measures State Implementation Plan (2009 RACT SIP) is now available for public review.

The VCAPCD reminds everyone that Tier 0 Portable Diesel Engines may not be operated in California after December 31, 2009.

There is a VCAPCD Board meeting scheduled for December 14, 2010. There are no Advisory Committee meetings or Hearings scheduled for December.

South Coast AQMD

www.aqmd.gov

Priority Reserves Lawsuit Update by Greg Adams, LACSD

SCAQMD continues to issue permits for essential public service projects under the provisions of SB 827, which will sunset on May 1, 2012. Meanwhile, to address concerns expressed in various lawsuits, SCAQMD is working to readopt Rule 1315 and complete a rather extensive CEQA analysis by January 7, 2011. Upon successful re-adoption, SB 827 will not be required for the issuance of permits. Nevertheless, environmental groups continue to challenge the validity of emission credits in state and federal courts of appeal.

Section 185 Update by David Rothbart, LACSD

Section 185 of the Clean Air Act requires major stationary sources, in severe or extreme nonattainment areas (e.g., the South Coast, Mojave Desert, San Joaquin Valley and portions of the Sacramento Valley Air Basins) to pay substantial penalties in event the 1-hour ozone standard is not achieved by a certain date. To avoid sanctions, which include a loss of federal highway funding, impacted air districts must implement Clean Air Act nonattainment fee rules by early 2011. Many of these air districts are also attempting to provide relief to well-controlled stationary sources by relying upon flexibility outlined in EPA's January 5, 2010 Section 185 guidance memorandum.

Meanwhile, environmentalists are challenging EPA's guidance memo in court. NRDC's November 5, 2010 legal brief argues that EPA lacks the authority to allow states to pursue alternatives to fining facilities in areas significantly violating the agency's ozone standard, urging a federal appeals court to reject EPA's guidance memo, which allows states to develop alternatives to Section 185 fees. If this challenge is successful, air districts would be required to collect Section 185 fees from major stationary sources commencing in 2012.

South Coast AQMD Rule 1110.2 Update by David Rothbart, LACSD

The February 1, 2008 amendment of SCAQMD Rule 1110.2 proposed to substantially reduce emission limits for engines fueled by landfill or digester gas. Although these limits were intended to be effective by July 1, 2012, the SCAQMD Governing Board specified that a final technology feasibility assessment was required before the standard would go into effect. SCAQMD staff was directed to report back to the Board to assure that cost-effective and commercial

technologies are available to comply with the proposed limits and that increased flaring of biogas would not occur. Due to delays caused by the permit moratorium, biogas engine demonstration projects needed to assess the proposed limits have yet to be completed. Moreover, SCAP members recently provided presentations to SCAQMD staff indicating that required retrofits are not cost-effective and would encourage flaring of biogas. These presentations are available for viewing at the following SCAP website link: <http://www.scap1.org/Air%20Reference%20Library>.

SCAQMD has suggested that Rule 1110.2 may be reopened as soon as June 2011 to address results gleaned from ongoing demonstration projects.



Biosolids

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Vice Chair Leyla Perez
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Kern County Measure E Update by Michael Sullivan and Matt Bao, LACSD

Kern County's Measure E, which would have banned the land application of biosolids in unincorporated Kern County, will soon make its way back to state court. On November 9th, U.S. District Court Judge Gary Fees granted Kern County's motion to dismiss the remaining causes of action (interfering with the California Integrated Waste Management Act's recycling goals and overstepping their police powers) in the litigation challenging Measure E and declined to keep the lawsuit against the ordinance in federal court. This leaves the parties to either reach a settlement or to re-file the case in state court. With the case dismissed, there is nothing currently restricting Kern County from enforcing the biosolids ban, but Kern County spokespersons have indicated that the county will not attempt to enforce the ban for at least 2 months. The City of Los Angeles and the other Plaintiffs have indicated that the case will be re-filed in state court within that time period.

EPA Proposed Standards for Sewage Sludge Incinerators Update by Michael Sullivan and Matt Bao, LACSD

CASA, NACWA, and two California agencies operating sewage sludge incinerators (the City of Palo Alto and Central Contra Costa Sanitary District) have sent comment letters to the US EPA in response to the recently proposed rule on standards for sewage sludge incinerators. The proposed rulemaking, announced in October, are intended to reduce the emissions of mercury, fine particles, and other pollutants from sewage sludge incinerators, such as multiple-hearth and fluidized bed incinerators. The proposed rules would also establish opacity, require installation of specific air pollution control devices, and require provisions for testing, monitoring, recordkeeping, reporting and operator training. As stated in the comment letters, the proposed rule would threaten the viability of biosolids incineration and thereby the optimization of renewable energy production. Specific issues with the proposed rule include: incorrect calculation and overestimation of baseline pollutant emissions; and the relatively small sample size of facilities (nine out of 218 incinerators) from which the proposed Maximum Achievable Control Technology standards were derived.

National Biosolids Meeting in Washington D. C. by Michael Sullivan and Matt Bao, LACSD

On December 1 and 2, the Water Environment Federation and the National Biosolids Partnership convened a meeting in Washington D.C. to discuss and chart future paths for biosolids management options with national biosolids leaders. Mike Moore (formerly with OCSD and currently with HDR) is the chair of the planning committee. Greg Kester (CASA), Todd Williams (CH2M), Jim Smith (Retired EPA, currently with Malcolm Pirnie) and Bob Dominak (North East Ohio Regional Sanitation District and co-chair of NACWA's biosolids committee) form the planning committee. All biosolids management options and issues, including energy recovery and climate change mitigation, will be discussed. Challenges, needs, and opportunities will be documented in an attempt to ensure their viability into the future. The SCAP biosolids committee will report on the outcome of the meeting as information becomes available.

Local Briefs by Michael Sullivan and Matt Bao, LACSD

On October 28th the Kern County Planning Commission approved the Liberty Energy Center Gasification Project. The proposed gasification facility would be built adjacent to the existing Liberty Composting Facility near Lost Hills, CA. Both facilities are permitted to manage approximately 800,000 combined tons of feedstock, including biosolids and green waste. At full build out, the gasification facility

would have the capability to produce a net total of 13.5 megawatts of renewable electricity.

CWEA is holding a one-day biosolids workshop on January 18th at the Los Angeles County Sanitation District office in Whittier, CA entitled, "Putting Regulators and Researchers in Touch with YOU... the Practitioner". The program features nationally recognized biosolids industry experts focusing on the implications of recent biosolids research. For registration information and additional workshop details, please visit the following link [here](#).

Sludge Suit Sent to Pasture for Now by James Burger and Gretchen Wenner, Californian staff writer jburger@bakersfield.com, Nov 09 2010

Kern County on Tuesday won a 4-year-old federal court battle with the city of Los Angeles over the dumping of southland sewage sludge on local fields. But Los Angeles is already gearing up to start a new battle over Kern County's Measure E sludge ban. U.S. District Court Judge Gary Feess dismissed what was left of a 2006 federal case on Tuesday, leaving the city of Los Angeles and other plaintiffs with the option of filing a new lawsuit in state court.

"The city of Los Angeles is evaluating its options in light of today's ruling," said John Franklin, spokesman for the Los Angeles City Attorney's Office. "The city looks forward to working with Kern County in a constructive manner to assess the next steps in the legal proceedings, taking into account the interests of all affected parties."

Kern County Counsel Theresa Goldner said Los Angeles attorneys have already informed county attorneys they will sue in state court. Still, local officials enjoyed their victory Tuesday. "This ruling means Los Angeles and other sanitation districts cannot challenge Kern County's ordinance under federal law," Goldner said in a statement. She said Kern County has the legal right to begin enforcing Measure E immediately. But it is likely Kern will wait before stopping the procession of trucks that drives into Kern County each day.

Measure E gave Los Angeles and Orange County a six-month grace period in which to end the land application of sludge. When Feess stopped enforcement of Measure E in November 2006, Goldner said, there were still roughly two months left in that grace period. Kern County staff will likely let those two months expire before asking the Board of Supervisors whether to enforce Measure E, Goldner said. When asked if Los Angeles had another place to dispose of its sludge if Kern County starts enforcing the ban,

Franklin said: "I don't think we have another place to take biosolids at this time."

Southern California's sludge lawsuit was filed in response to Measure E, Kern County's voter-approved ban on the land application of treated human and industrial sewage sludge. Voters here overwhelmingly approved the measure in June 2006, with more than 83 percent voting "yes." Feess had originally ruled in favor of Los Angeles on some matters, but the Ninth Circuit Court of Appeals overturned those rulings last year and sent the case back to Feess. This summer, the U.S. Supreme Court refused to hear the case.

On Tuesday, over the protests of Los Angeles attorneys, Feess said Los Angeles' two remaining legal arguments -- that Kern County overstepped its police powers and violated the intentions of the California Integrated Waste Management Act -- do not belong in federal court. His order dismissed the federal case against Measure E. Kern had already been in sludge-related legal battles for years after establishing rules in the 1990s saying only the most highly treated sewage sludge could be spread on county land. After Measure E passed, the city of Los Angeles, along with sanitation districts in Los Angeles and Orange counties and other industry interests, filed a federal suit against Kern in August 2006.

State Sen. Dean Florez, the Shafter Democrat who spearheaded Measure E, said Tuesday's dismissal "makes it clear leaders in Los Angeles need to do the right thing and stop dumping sludge in Kern County. "It's a vindication that the people of Kern County had it right when they overwhelmingly voted in favor of Measure E," Florez said in an e-mail.

Kern County has long been the final destination for sewage sludge -- also called by the industry-coined term "biosolids" -- trucked in from Los Angeles, Orange County and other locales. Land application of sludge became popular after ocean dumping was outlawed and landfill disposal proved more expensive. Proponents equate land application with beneficial recycling of organic matter and say sludge makes excellent fertilizer. Critics say pathogens, heavy metals, pharmaceuticals, household chemicals and varying contents of industrial waste streams aren't completely eradicated by treatment, making sludge a threat to soil, groundwater and potentially to human health. Some soil scientists have also expressed concern over the sheer quantity spread over and over again on the same spots at sludge farms like the ones in Kern County.

The city of Los Angeles owns and operates its Green Acres farm south of Bakersfield, where most of that

city's sewage sludge continues to be trucked on a daily basis. Farmer Shaen Magan owns a private operation in northern Kern that takes sludge from Orange and Los Angeles counties as well as Valencia, Goleta and Ventura, county records show.

Kern's ban only applies to property in unincorporated areas of the county. Entities can and do land apply treated sludge in cities within Kern. The city of Bakersfield applies its treated sludge to city-owned land. The county's Kern Sanitation Authority treats its sewage sludge to the "exceptional quality" standard and sends it to a composting facility.

There are other independently operated sanitation districts in the county.

Lastly, Bob Kreg, LACSD's Sam Espinoza and El Toro Water District's Ralph Palomares made a comprehensive presentation on how to manage a SSO emergency, using actual circumstances encountered in previous emergency situations.



Energy Management

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Collection Systems

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November 18, 2010 Collection Systems Committee Meeting by John Pastore, SCAP

On November 18th, the Collection Systems Committee conducted its 4th and final committee meeting of the year at the offices of the Los Angeles County Department of Public Works. An overview of the LA County DPW's collection systems maintenance operation was presented by LADPW's Nicholas Agbobu. Next Michael Flores of RMC Water and Environment made an informative presentation about options for performing SSMP audits. SCAP's Bob Kreg gave a brief update on the WDR Triennial Review, the WDR/SSO Data Review Committee and the proposed NPDES permit requirements for public sewer collection systems.



RMC's Michael Flores discussing SSMP audits

EPA Provides Information on Innovative and Emerging Energy Conservation Measures to Help Wastewater Utilities Reduce Energy Consumption

Andre Schmidt, LACSD

As part of U.S. Environmental Protection Agency's (EPA) commitment to expanding cost saving, energy conservation, and efficiency programs, it has released a new technical document to assist municipal utility owners and operators in finding information on cost-effective energy management and energy conservation measures and technologies to reduce total energy usage at their wastewater treatment facilities. The document, "Evaluation of Energy Conservation Measures for Wastewater Treatment Facilities," presents technical and cost information about energy management and energy conservation measures and technologies.

Technical and cost data were developed from literature sources and provided by manufacturers and operating facilities. The document provides preliminary information on innovative and emerging energy conservation measures and technologies that have the potential for substantial energy savings. In addition, the document includes nine in-depth facility studies that further examine application and cost information for various full-scale, operational energy conservation measures and technologies.

For more information and to view a copy of the document, please visit the following website:
<http://water.epa.gov/scitech/wastetech/publications.cfm>.



Water Issues

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calculations to determine the validity of claims made by SWRCB staff and its consultant at the 11/16/10 workshop.

SWRCB Whole Effluent Toxicity Policy by John Pastore, SCAP

On October 20, 2010 the SWRCB released its most recent draft of the Whole Effluent Toxicity (WET) Policy for public review and comment. A workshop was held on November 16th in Sacramento to receive comments on the policy. Testimony was given by more than 20 agencies and organizations, including SCAP, on the wastewater communities concerns over the proposed policy. A 60 day extension to the written comment period was requested and granted by the SWRCB. The new deadline for submission of written comments is now noon on January 21, 2011.

Additionally, the SWRCB directed staff to perform a "test drive" analysis, with a limited group of dischargers to analyze actual effect of policy with regard to false determinations of toxicity and violations. Tri-TAC members are working together to provide test data

Non Sequitir:

During this season, play and make good cheer,
For Christmas comes but once a year.
- *Author Unknown.....*

Some of our Supporting SCAP Associate Members



A Residuals Management Company



BUILDING A BETTER WORLD

