

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR REGULAR MEETING OF SEPTEMBER 10, 2004

Prepared on August 18, 2004

ITEM NUMBER: 22

SUBJECT: Issuance of Waste Discharge Requirements for Wastewater Collection Agencies Tributary to the South San Luis Obispo County Sanitation District Wastewater Treatment Facility, San Luis Obispo County – Order No. R3-2004-0062

KEY INFORMATION

Permittees: City of Arroyo Grande
City of Grover Beach
Oceano Community Services District
Location: Various locations in southern San Luis Obispo County
Discharge Type: Municipal Wastewater
Type of Waste: Municipal Wastewater
Discharge Capacity: Variable
Treatment: None
Disposal: Permittee-owned wastewater collection systems discharge to South San Luis Obispo County Sanitation District Wastewater Facilities
Reclamation: N/A
Existing Order: National Pollutant Discharge Elimination System Permit CA0048003 - Waste Discharge Requirements Order No. 99-32

SUMMARY

Historically, throughout the Central Coast Region, requirements pertaining to wastewater collection systems have been incorporated into Waste Discharge Requirements (WDR) for the treatment facility to which those collection systems are tributary. However, in recognition of the different discharge specifications, monitoring requirements, and responsible agencies involved in the tributary wastewater collection systems and the treatment facility, staff proposes to regulate the wastewater collection agencies using WDRs separate from the treatment facility permit.

Proposed WDR Order No. R3-2004-0062 is intended to regulate local wastewater collection agencies with collection systems tributary to the South San Luis Obispo County Sanitation District Wastewater Treatment Facility (Treatment Facility).

Currently, those tributary collection agencies include the City of Arroyo Grande, the City of Grover Beach, and Oceano Community Services District (jointly referred to as Permittees). The Treatment Facility is owned and operated by the South San Luis Obispo County Sanitation District (Sanitation District). The Permittees and the Sanitation District have been regulated by National Pollutant Discharge Elimination System (NPDES) Permit CA0048003 (WDR Order No. 99-32) since July 1999.

DISCUSSION

On November 1, 2002, during its regular public meeting, the Regional Board indicated its support for considering separate WDR Orders for sewerage agencies tributary to wastewater treatment facilities.

To date, such WDR Orders have been adopted for sewerage agencies tributary to Monterey Regional Water Pollution Control Agency and City of Watsonville treatment facilities. The proposed Order is consistent with requirements adopted for other sewerage agencies.

Additional reasons for separating requirements for the collection systems from the Sanitation District's NPDES Permit include expectation that such action will result in:

- Increased awareness and responsibility of Permittees to facilitate proactive wastewater collection system management.
- Permittees having a clear set of requirements applicable to their system, as opposed to having collection system requirements incorporated with other requirements in the NPDES Permit.
- Regional Board's improved ability to regulate each system independently. If compliance issues arise, the Order allows the Regional Board to work with the particular system to return it to compliance independently from the other systems.
- The proposed Order will allow for more clear tracking through both electronic and hard copy files. This will enable greater efficiency in the evaluation of the collection systems' compliance with applicable requirements.

It is essential that the proposed Sanitation District's NPDES Permit No. R3-20043-0050 and the proposed Waste Discharge Requirements Order No. R3-2004-0062 be adopted concurrently. Since the NPDES Permit will no longer directly regulate the collection system agencies, these Waste Discharge Requirements are necessary to ensure consistent Permittee regulation.

The Permittees own and/or operate various wastewater collection systems in southern San Luis Obispo County tributary to the Treatment Facility. The location of the Permittees is depicted on Attachment A of the Order. Properly designed, operated and maintained wastewater collection systems are meant to collect and transport all of the wastewater that flows into them to a publicly

owned treatment works. However, occasional unintentional discharges of wastewater from municipal sewers occur in every system. Unintentional discharges are commonly referred to as wastewater collection system overflows (or simply overflows). These overflows have a variety of causes, including but not limited to severe weather, improper system operation and maintenance, and vandalism. Nationwide, the United States Environmental Protection Agency (USEPA) estimates that there are at least 40,000 sewage overflows each year. Untreated sewage overflows can contaminate State waters, causing serious water quality problems. Sewage system blockages can back-up into basements, causing property damage and threatening public health.

Many avoidable overflows are caused by inadequate or negligent operation or maintenance, inadequate system capacity, and improper system design and construction. Overflows can be reduced or eliminated by:

- Regular sewer system cleaning and maintenance, including video surveys.
- Reducing infiltration and inflow through system rehabilitation and repairing broken or leaking service lines.
- Enlarging or upgrading sewer, pump station, or sewage treatment facility capacity and/or reliability.
- Constructing wet weather storage and treatment facilities to treat excess flows.
- Proper and ongoing employee training.

Communities need to address overflows during sewer system master planning and facilities planning, or while extending the sewer system into previously unsewered areas.

Some overflows are unavoidable. Unavoidable overflows include those occurring from unpreventable vandalism, some types of pipeline blockages, extreme rainfall, and acts of nature (e.g., earthquakes or floods).

Spill History: Based upon Regional Board records, the Permittees have experienced few overflows and those which have occurred, have been contained and cleaned up without discharge to surface waters. However, increased flows in the Oceano collection system observed after the December 2003 earthquake, may indicate significantly increased infiltration and inflow problems leading to greater potential for overflows.

The NPDES Permit that previously covered the sewerage agencies required development of an Infiltration/Inflow and Spill Prevention Program (Program). The Program was required to identify infiltration and inflow sources as well as identify, assign, and implement spill prevention measures. The Permittees have developed such Programs, however regular reports regarding implementation (required semi-annually) have not been received. A March 10, 2004 Notice of Violation for failure to submit the reports resulted in submittal of the required reports by each of the Permittees. However, review of the report contents make plain that additional guidance regarding the Program is warranted. The needed guidance is provided in the proposed Order as described below.

The proposed Order requires the Permittees to develop a Wastewater Collection System Management Plan (Management Plan). The Management Plan is a more detailed and comprehensive approach to spill prevention with the goal of reducing overflow frequency and impacts. The Management Plan builds on the Programs required by the previous NPDES Permit, and provides for their integration as the Management Plan is developed. A Monitoring and Reporting Program is included as Attachment B to the Order. Specific guidance regarding Management Plan contents is included as Attachment C to the Order and a Spill Reporting Form is included as Attachment D.

Beach Closure: In accordance with State statutes, the San Luis Obispo County Health Department monitors ocean waters at public beaches and water contact recreation areas. Water samples are collected from sites that are: 1) visited by over 50,000 people annually; and 2) adjacent to storm drains (including rivers, creeks and streams).

Collected samples are analyzed for bacteriological "indicator" organisms to determine the presence of pathogens known to threaten human health. Elevated indicator organism concentrations are suggestive of contamination by human sewage and other wastes, which may result in human disease. When bacterial indicator organisms exceed the State guidelines for beaches, the presiding County Health Department takes appropriate actions to ensure that the public is safe, and that the causes of contamination are addressed. Raw sewage from collection systems is very high in bacteria (on the order of millions of bacteria per 100 milliliters), so any collection system overflows that discharge to beach waters threaten to violate public health standards for recreation.

Enforcement: The Water Code provides for discretionary penalties for unauthorized discharges, which, with few exceptions, include sewage overflows. The proposed Order does not change Regional Board enforcement authority.

The proposed Order's overall goal is to minimize overflows through a consistent and proactive collection system management program. The proposed Order allows local sewerage agencies to expand established programs while continuing to improve on collection system maintenance and operations.

ENVIRONMENTAL SUMMARY

Waste discharge requirements for related discharges are exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21100, et. seq.) in accordance with Section 13389 of the California Water Code.

COMMENTS AND RESPONSE

City of Arroyo Grande: The City of Arroyo Grande has an Infiltration/Inflow and Spill Prevention Program in place, which has been successful for over 40 years. The goal of the proposed Order has already been met, and further regulation (adoption of the Order) may result in redirecting City resources away from operation and maintenance. The City's comment letter is included as Attachment 2.

Staff Reponse: The proposed Order continues existing requirements and provides specific guidance for implementing those requirements. Accordingly, it is not clear how City resources might be redirected away from collection system operations and/or maintenance. As indicated above, the City of Arroyo Grande has not consistently complied with existing requirements for submittal of semi-annual reports summarizing collection system management issues.

City of Grover Beach – No comments received
Oceano CSD – No comments received
SLO Co. Planning – No comments received
SLO Co. Envi. Health – No comments received
SLO Co. Public Works – No comments received
So. SLO Co. San Dist. – No comments received
SWRCB – No comments received

ATTACHMENTS

1. Proposed Order No. R3-2004-0062 with Attachments
 - A. Vicinity Map
 - B. MRP No. R3-2004-0062
 - C. Elements of the Wastewater Collection System Management Plan
 - D. Sewage Overflow Report
2. City of Arroyo Grande comment letter

RECOMMENDATION

Adopt Waste Discharge Requirements Order No. R3-2004-0062 as proposed.