



California Regional Water Quality Control Board

Central Coast Region



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Arnold
Schwarzenegger
Governor

April 17, 2006

Mr. Clint Quilter
City of Hollister
375 Fifth Street
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Dear Mr. Quilter:

RESPONSE TO LONG TERM WASTEWATER MANAGEMENT PROGRAM, DECEMBER 2005: CITY OF HOLLISTER DOMESTIC AND INDUSTRIAL WASTEWATER TREATMENT PLANT, SAN BENITO COUNTY

We reviewed the City of Hollister's December 2005 Long-Term Wastewater Management Plan (Management Plan) for the Domestic and Industrial Wastewater Treatment Plants (DWTP and IWTP respectively). Notwithstanding the following comments, the report meets the intent of provisions requiring the development of a Management Plan as set forth in Waste Discharge Requirement (WDR) No. 00-020, Cease and Desist Order (CDO) No. R3-2002-0105, and Administrative Civil Liability (ACL) Order No. R3-2002-0097 (revised October 21, 2005). We understand that the Management Plan is a working document given there are inherent uncertainties associated with the development of the Hollister Urban Area Water and Wastewater Master Plan. Our comments are broken down into the following topics:

- 1) Adopted Orders
- 2) Compliance Schedule
- 3) Construction Staging
- 4) DWTP Design Assumptions
- 5) Salinity Control
- 6) IWTP

ADOPTED ORDERS

The Management Plan (bottom of page 1-7 and Appendix C) incorrectly references the draft Order No. R3-2005-0142 that was not adopted as proposed and lists three compliance requirements; two of which are not a part of the adopted Order No. R3-2005-0142 and amended ACL Order No. R3-2002-0097. Waste Discharge Requirements Order No. 00-020 and Cease and Desist Order No. R3-2002-0105 were not revised as initially proposed. Subsequently, the Regional Board did not grant continued diversions of domestic wastewater to the IWTP and did not set a new Management Plan implementation due date of December 31, 2007. Adopted Order No.

R3-2005-0142 and amended ACL Order No. R3-2005-0097 were transmitted to Mr. Clint Quilter on November 7, 2005. For clarification, Order No. R3-2005-0142, as adopted by the Central Coast Water Board on October 21, 2005, made the following amendments to ACL R3-2002-0097:

IT IS HEREBY ORDERED, that the time schedule in ACL Order No. R3-2002-0097 in Suspended Liability paragraph no. 3 of the ACL Order is amended to establish three additional compliance activity milestones linked to the suspension of portions of the assessed liability. Suspended Liability paragraph no. 3 of the ACL Order is hereby revised as follows:

3. An additional \$200,000 is suspended in three increments in accordance with the following on condition the Discharger:
 - a. \$66,000 is suspended on condition the Discharger submits an updated Long-term Wastewater Management Program technical report by December 31, 2005.
 - b. \$67,000 is suspended on condition the Discharger awards the contracts for construction of the new domestic wastewater treatment and disposal facility by October 31, 2006.
 - c. \$67,000 is suspended on condition the Discharger submits a complete Report of Waste Discharge by March 31, 2007 for the new domestic wastewater treatment and disposal facility.

~~Fully implements, by **October 15, 2005** **December 31, 2007**, all aspects of the Long-term Wastewater Management Program required under Provision 7 of Waste Discharge Requirements Order No. 00-020 for the Industrial Wastewater Treatment Facility. Full implementation includes all necessary permitting actions, environmental review, design, construction, and funding.~~

The Discharger shall demonstrate timely compliance with all terms of this compliance ~~project~~ schedule to the satisfaction of the Executive Officer.

COMPLIANCE SCHEDULE

The Management Plan implementation schedule is not in line with compliance due dates set by the Central Coast Water Board in amended ACL No. R3-2002-0097. Specifically, the City forecasts awarding the construction contracts for "Treatment/Storage" facilities in August 2006 and the Phase I-Interim Effluent



Management Project (Phase I) in May 2007. Per the amended ACL, the City must award contracts for the "treatment and disposal" facility by October 31, 2006. Per the submitted Management Plan the Interim Effluent Management Project is the City's chosen disposal facility alternative. As such, failure to award contracts for both the new domestic wastewater treatment facility and Phase I disposal infrastructure by October 31, 2006 will result in violation of Administrative Civil Liability Order No. R3-2002-0097, paragraph 3.b. as noted above. Although the information provided by the City prior to and during the October 21, 2005 hearing for the City's compliance deadline extension request proposed awarding contracts for Phase I in May 2007, it is uncertain why this issue was not specifically addressed during the hearing. We understand the successful completion of Phase I relies on obtaining 875 acres of irrigated acreage. The Management Plan indicates that specific sites have yet to be selected. Securing the needed land either through purchase or lease agreements in addition to procuring the necessary right-of-ways for distribution piping, let alone completing CEQA for this phase of the Management Plan, does not appear feasible even within the City's proposed May 2007 timeframe. In addition, more recent information indicates the City will not be able to meet its proposed completion dates as proposed in the July 21, 2005 extension request and as outlined in the Management Plan. Please submit a revised and up-to-date Management Plan implementation schedule that correctly outlines the required activities and anticipated completion dates. Explanations should be provided describing why the initially proposed completion dates will not be met. A revised implementation schedule shall be provided to the Water Board whenever the City becomes aware of scheduling changes.

Furthermore, the implementation schedule does not list the required March 31, 2007 Report Of Waste Discharge (ROWD) and amended Management Plan submittal. The submittal of the ROWD is one of three suspended liability items stated in the amended ACL as noted above. Please note that the ROWD application will not be complete without the amended Management Plan.

CONSTRUCTION STAGING

It is unclear how the City will compensate the loss of approximately 60% of its existing disposal capacity at the DWTP and two emergency storage basins during construction of the proposed 1,500 acre-ft seasonal storage reservoir. The proposed seasonal reservoir location is west of Highway 156 on a 77-acre property currently used for percolation of effluent from the DWTP and emergency storage. As proposed, the construction of the seasonal reservoir is to be completed prior to the completion of the distribution system and irrigation disposal areas for the Phase I effluent Management Plan.

How the City will maintain adequate disposal capacity during construction of the proposed seasonal reservoir is a significant concern given the DWTP is already at capacity with regard to disposal. In the event the Phase I effluent management project is fully operational prior to the construction of the seasonal storage reservoir it is still



uncertain how the City will handle the storage and disposal of effluent at the DWTP. Please provide a plan with supporting technical documentation (water balance) describing how the City will provide adequate storage and disposal during construction of the seasonal storage reservoir. This plan is due at least 90 days prior to the start of construction or as part of the March 2007 amended Management Plan, whichever comes first.

Based on the Management Plan it is assumed the existing domestic wastewater treatment facility will remain fully operational during construction of the new treatment facility resulting in no decrease in the current treatment capacity. Please clarify this in the amended Management Plan.

DWTP DESIGN ASSUMPTIONS

The basis for using an inflow and infiltration (I/I) flow increase assumption of 5% in the water balance (footnote a of Table 8-5 presented in section 8.2.4 of the Management Plan) is unclear. This value appears low given the Management Plan indicates that the historical peak wet weather flow at the DWTP exceeds the average dry weather flow by as much as 10%. The design treatment capacity for the DWTP accounts for a 10% flow increase due to I/I. In addition, the design hourly flow rate peaking factor of two for hydraulic sizing of the plant appears to be a bit low. Peaking factors presented in *Wastewater Engineering - Treatment, Disposal, and Reuse* by Metcalf & Eddy, Inc. recommend a peaking factor of about three for a domestic wastewater treatment plant with an average flowrate of 5 million gallons per day.

Aside from the above noted I/I assumption of 5% Management Plan, section 8, presents reasonable and conservative water balance assumptions for the DWTP. However, the projected seasonal storage requirements for the Phase I and Phase II recycled water projects exceed the proposed seasonal storage reservoir capacities by 1 acre-ft and 116 acre-ft, respectively. Although the Management Plan states that these numbers are preliminary and for planning purposes, we are concerned that no safety factor has been applied to the seasonal storage pond design. A reasonable amount of excess storage capacity should be designed into the seasonal storage reservoirs to avoid potential overflow events.

Adequate hydraulic sizing of the wastewater treatment and storage facility is critical in order to avoid emergency wastewater discharges. Consequently, please provide clarification of the I/I flow and design peak hourly flow rate assumptions utilized in the design of the DWTP in the March 2007 amended Management Plan. In addition, please provide justification for not using a safety factor for the design of the proposed seasonal storage reservoirs.

SALINITY CONTROL

Section 9.7 of the Management Plan briefly discusses several source control measures that the City proposes to implement to meet a recycled wastewater total dissolved solids (TDS) concentration target of 500 mg/L by 2015. This target was established in the Hollister Urban Area Water and Wastewater Master Plan Memorandum of Understanding (MOU). The MOU also established drinking water TDS and hardness concentration targets of 500 mg/L and 120 mg/L, respectively. Both of these goals are intended to facilitate the successful implementation of the proposed Phase II - Recycled Water Project.

The City's proposed source control measures include a salinity education program, control of industrial salt discharges to municipal sewer (commonly referred to as a pretreatment program), and water softener ordinance. Implementation of the proposed source control measures will be essential for, but will not guarantee, the success of the Phase II-Recycled Water Project and the City's ability to meet more stringent salt effluent limits. Consequently, section 9.7.5 of the Management Plan also discusses the potential implementation of advanced treatment of the municipal water supply and DWTP effluent via reverse osmosis or electro-dialysis reversal, to meet the recycled wastewater TDS goal.

Our understanding is that the pending Hollister Urban Area Water and Wastewater Master Plan will identify and expand on the specific projects required to meet the TDS goals and implement the Phase II - Recycled Water Project. The Management Plan will subsequently be amended to include the findings of the Master Plan. Please provide a detailed evaluation of the proposed source control measures in the amended Management Plan to determine their potential offset in TDS loading (broken down into contributing constituents), and identify the oversight and enforcement measures required to successfully implement the proposed salinity control program. In addition, the amended Management Plan needs to provide a detailed feasibility analysis for the disposal of brine generated via the advanced treatment of the municipal supply and DWTP effluent if selected as required implementation measures per the Master Plan.

THE IWTP

The Management Plan proposes no immediate changes to the IWTP until completion of the Hollister Urban Area Water and Wastewater Master Plan (incidentally, three different completion dates of January 2007, December 2006, and Spring/Summer 2007 are noted in the Executive Summary, Management Plan Implementation Schedule, and sections 1.1, 7.1, and 10.2.1 of the for the completion of the Master Plan). Our understanding is that the Master Plan will be completed by December 2006. As proposed by the City an amended Management Plan will be submitted in March 2007 that will include the Master Plan recommendations for the IWTP. In the interim, the Management Plan indicates that the City will rely on source control measures to address total dissolved solids, sodium, and chloride loading to the IWTP. Our records

indicate that the City's historical efforts to require the sole industrial discharger, San Benito Foods, to implement source control measures have been unsuccessful. The City's proposed interim measures for the IWTP via source control will only be effective if supported by sufficient oversight and enforcement by the City. Please keep in mind that the City is ultimately responsible for the IWTP discharge and any resultant effluent violations regardless of failed attempts at requiring San Benito Foods to implement appropriate source control measures.

Given the scope of the proposed DWTP improvements outlined in the Management Plan and the uncertainty of San Benito Foods' continued operations in Hollister, we understand the City's reasons for deferring any measures addressing the IWTP. However, please keep in mind that WDR Order No. 00-020, CDO Order No. R3-2002-0105, and ACL Order No. R3-2002-0097 specifically requires that the Management Plan address the IWTP. Failure to adequately address the IWTP in the amended Management Plan is a violation of these orders. As such, the amended Management Plan must completely address any ongoing operations at the IWTP with regard to treatment and disposal capacity, inorganic and nutrient constituent loading to groundwater, the combined sewer (industrial sewer storm drain), and odor control. If the Master Plan proposes the elimination of the IWTP, the amended Management Plan should address decommissioning of the facility, propose a post operation groundwater monitoring plan, and outline the selected or alternative end uses for the facility property that are appropriate given its historical use.

Management Plan Section 4.2.2 states that a wastewater and storm sewer separation project (elimination of combined sewer system) will provide for odor control only "if it is implemented." This implies that the elimination of the combined sewer (industrial sewer storm drain) is optional and is tied to odor control management. Regardless of findings in the WDR indicating the IWTP has enough capacity to handle the limited inflow of storm water from the industrial sewer storm drain and the City's successful implementation of an odor Management Plan, the elimination of the combined industrial and storm sewer is required. Provision D.7.i of WDR No. 00-020 specifically requires that the Management Plan address the elimination of any combined sewer system. The staff report for WDR No. 00-020 specifically defines "combined sewer" as the "industrial sewer storm drain." This requirement specifically targets the industrial sewer storm drain because the collection systems for the industrial and domestic wastewater treatment plants are separate; the line that carries domestic wastewater to the IWTP is tied directly into the IWTP headworks. Furthermore, the sunset date for the allowable diversion of domestic wastewater to the IWTP precludes the need for such a requirement if a combined industrial and domestic sewer did exist.

In summary, you are required to provide more detailed information in the amended Management Plan submitted as part of your ROWD application due on March 31, 2007. The additional information required in the amended Management Plan as noted above in more detail shall include:



1. A detailed construction staging plan to ensure adequate treatment, storage, and disposal is maintained during construction activities.
2. Clarification of design flow and seasonal storage reservoir sizing assumptions
3. A detailed evaluation of source control measure for the implementation of the salt management program and feasibility analysis for the disposal of advanced water/wastewater treatment generated brine.
4. A detailed evaluation of and subsequent proposal for the long-term fate of the IWTP.


For clarification, the amended Management Plan is required as part of your ROWD application package due on March 31, 2007. Failure to adequately address the above noted issues will result in your ROWD application being incomplete.

In addition, you are required to provide updated implementation schedules whenever the schedule is modified. Your first updated implementation schedule is due forthwith.

Questions regarding this matter may be directed to **Cecile DeMartini at (805) 542-4782** or **cdemartini@waterboards.ca.gov**, or David Athey at (805) 542-4644.

Sincerely,



 : Roger W. Briggs
Executive Officer

Paper File: Dischargers: City of Hollister, Industrial Plant
Electronic File: C:\Documents and Settings\mkeeling\Desktop\LTWMP_Resp033006 MTK.doc
Task Code: 126-01

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