

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

**STAFF REPORT FOR REGULAR MEETING OF FEBRUARY 9, 2007**

Prepared on January 9, 2007

**ITEM NUMBER: 14**

**SUBJECT: Reissuance of Waste Discharge Requirements for California Utilities Service, Monterey County – Order No. R3-2007-0008**

**KEY INFORMATION**

Location: 16625 Reservation Road (G17), Salinas, Monterey County  
Type of Discharge: Secondary treated domestic wastewater  
Permitted Flow: 300,000 gallons per day (gpd based on rated design capacity)  
Average Flow: 214,000 gpd (30-day average)  
Type of Treatment: Secondary with the option of disinfection  
Disposal Method:  
Wastewater: Land application via overhead sprinklers  
Solid Wastes: Offsite disposal of biosolids at Monterey Regional Landfill  
Existing Orders: Waste Discharge Requirements Order No. 95-23  
**This Action: Adopt of Waste Discharge Requirements**

**SUMMARY**

California Utilities Service, Inc. (hereafter referred to as the "Discharger") owns and operates a wastewater collection, treatment, storage and disposal facility (hereafter referred to as the "Facility"). The Facility was historically owned and operated by Salinas Utilities Services and Toro Management Services until approximately 1986. The Facility has been in operation since 1965.

The Discharger provides wastewater collection and treatment services to residential and light commercial areas in the Toro area along Highway 68 south of Reservation Road. The Facility currently serves 1,114 connections primarily consisting of residential dwellings. Light commercial facilities served by the Facility include an elementary school, the Coral de Tierra Country Club, the Cypress Church,

and a number of small business parks and office buildings.

The Facility is currently permitted under Waste Discharge Reclamation Requirements Order No. 95-23 issued to the Discharger by the Water Board on February 10, 1995. The existing waste discharge requirements Order is over 10 years old and is in need of revision to update requirements such that they are consistent with current regulations and policies. In addition, the Discharger is requesting the removal of the disinfection and weekly total coliform testing requirements contained within the existing Order. A requirement for disinfection and total coliform testing is not consistent with the location and nature of the land discharge.

## PROPOSED ORDER

Order No. R3-2007-0008 (proposed Order) significantly updates the waste discharge requirements. The following discussion briefly outlines the format of the proposed Order and significant changes. Findings of the proposed Order address the various aspects of the Facility and applicable regulations in detail and will not be repeated here. A discussion of the compliance history is not warranted as the Facility has remained in compliance with the existing Order with the exception of the violation of Standard Provisions associated with record keeping and the maintenance of monitoring equipment as noted in a notice of violation dated October 1, 2004.

The proposed Order is broken down as follows:

- Findings
- Prohibitions
- Specification
  - System Operation
  - Flow and Effluent Limitations
  - Groundwater Limitations
  - Nutrient Management Plan
  - Salts Management Program
  - Sanitary Sewer Overflows/Sewer System Management Plan Requirements
- Provisions

Significant changes to the proposed Order include:

- **Effluent Limitations** – Effluent limitations were added for biochemical oxygen demand (BOD), Total Suspended Solids (TSS), nitrate, sodium, chloride, sulfate and boron. The effluent limitations consist of a combination of 30-day and 7-day average (arithmetic mean) values. The BOD and TSS effluent limitations consist of technology-based effluent limitations for secondary treatment<sup>1</sup>. It should be noted that the prescribed technology-based BOD

<sup>1</sup> 40 CFR Part 133.102 contains BOD and TSS 30-day and 7-day average minimum technology based effluent limitations for secondary treatment of 30mg/L and 45 mg/L, respectively.

and TSS effluent limitations are promulgated for surface water discharges (NPDES permits). They are being utilized here to evaluate the Facility's ability to effectively stabilize the influent waste loading and treatment capacity. Although no effluent BOD or TSS data is available for the Facility, the proposed BOD and TSS effluent limitations are technologically achievable for the Facility treatment configuration. The effluent limitations for Total Dissolved Solids (retained from previous permit), sodium, chloride, sulfate and boron are consistent with the Basin Plan water quality objectives. The 7-day average nitrate effluent limitation is consistent with the Maximum Contaminant Level (MCL) of 10 mg/L (as nitrogen); whereas the 30-day average nitrate effluent limitation of 8 mg/L is based on best professional judgment and intended to ensure the effluent consistently meets or exceeds the MCL. An effluent limitation for free chlorine residual was removed from the proposed Order (the former Order did not contain a monitoring requirement to verify this limitation).

- **Nutrient Management Plan** – Specific requirements were added to the proposed Order requiring the Discharger to develop and implement a nutrient management plan for the land application of wastewater to ensure it is applied at agronomic rates and will not result in the leaching of nitrogen to the groundwater basin.
- **Salt Management Plan** - Specific requirements were added to the proposed Order requiring the Discharger to develop and implement a salts management plan to document salt loading and to evaluate and implement reduction measures as practicable to reduce salt loading to the groundwater basin.
- **Sanitary Sewer Overflows/Sewer System Management Plan Requirements** – Requirements for the implementation of a sewer system management plan were added to the proposed Order to establish procedures to track, mitigate and prevent overflows from the Discharger's collection system.

## MONITORING AND REPORTING PROGRAM

The proposed Monitoring and Reporting Program requirements are broken down as follows:

- Water Supply Monitoring
- Influent Monitoring
- Effluent Monitoring
- Effluent Storage Pond and & Disposal Area Monitoring
- Solids/Biosolids Monitoring
- Reporting
- Provisions

Significant changes to the proposed Monitoring and Reporting Program include:

- **Water Supply Monitoring** – Nitrate was added to water supply monitoring parameters.
- **Influent Monitoring** – Influent monitoring was added to the Monitoring and Reporting Program. The added influent monitoring parameters consist of influent flow, weekly pH; monthly BOD, TSS, and total nitrogen; and semiannual TDS, sodium, chloride, sulfate, and boron.
- **Effluent Monitoring** – Weekly monitoring of total coliform organisms, settleable solids (three times per week), bi-weekly dissolved oxygen, monthly total Kjeldahl nitrogen, and continuous turbidity were eliminated. Monthly monitoring of BOD, TSS, total nitrogen, and ammonia (nitrate monitoring was retained) were added to the effluent monitoring requirements. The monitoring frequency for pH was increased from quarterly to weekly.
- **Groundwater Monitoring** – Groundwater monitoring frequency was increased from a semiannual frequency to a quarterly frequency for depth to water, total nitrogen (in place of total Kjeldahl nitrogen, nitrate, TDS, sodium, chloride, sulfate, and boron).
- **Effluent Storage Pond & Disposal Area Monitoring** – The proposed Monitoring and Reporting Program requires the Discharger to monitor the effluent storage

pond on a daily basis and record the depth and volume of stored effluent, and the volume of remaining available storage. The proposed Monitoring and Reporting Program also requires the Discharger to conduct daily visual monitoring of the land application area.

- **Solids/Biosolids Monitoring** – Annual biosolids monitoring for arsenic, cadmium, chromium, copper, lead, mercury, nickel, selenium, and zinc were removed from the proposed Monitoring and Reporting Requirements. In place, the Discharger is required to submit copies of all biosolids analytical data required by other agencies and licensed disposal facilities for the previous year. In addition, the proposed Monitoring and Reporting Program requires the Discharger to provide an annual report of the amount of solids generated at the facility, with a description of the treatment, and documentation of ultimate disposal.
- **Reporting Frequency** – the Discharger reporting frequency was reduced from monthly to quarterly. The Discharger is still required to submit annual reports per the Standard Provisions.

## ENVIRONMENTAL SUMMARY

These waste discharge requirements are for an existing facility and are exempt from provisions of the California Environmental Quality Act (Public Resources Code Section 21100, et. seq.) in accordance with California Code of Regulations, Title 14, Chapter 3, Section 15301.

## COMMENTS & RESPONSES

On December 13, 2006, the Central Coast Water Board notified the Discharger and interested parties of its intent to issue revised Waste Discharge Requirements for California Utilities Service and provided them with a copy of the proposed Order and an opportunity to submit written views and comments.

Water Board staff received written comments from Mr. Thomas Adcock, Vice President of California Utilities Service, Inc.

Comments are addressed in this section with the comment letters attached for reference. The comments are referenced by number and are not repeated here for brevity except for the use of excerpted or paraphrased portions of the actual comments for clarification as noted. Related comments may also be grouped together for brevity. As such, the following consists only of staff responses to comments, and any subsequent staff recommendations or changes to the proposed Order.

**Mr. Thomas Adcock, Vice President of California Utilities Service, Inc.;** Written comments were received January 8, 2007:

Staff Response to Comments 1 (Staff Report and Draft Waste Discharge Requirements):

Staff has corrected the date references from 1996 to 1986 in both the staff report and WDR as noted.

Staff Response to Comment 1 (Draft Monitoring and Reporting Program):

Continuous turbidity monitoring was removed from the effluent monitoring requirements found in section C.1 of the Monitoring and Reporting Requirements as requested. This change is consistent with the elimination of the disinfection requirements and chlorine residual monitoring given the treated wastewater is land applied in an area without public access and is not subject to Title 22 reclamation or NPDES requirements.

Staff Response to Comment 2 (Draft Monitoring and Reporting Program):

Paragraph E.1 of the Monitoring and Reporting Program has been modified as follows to reduce depth and volume monitoring (gauging) frequency of the effluent storage pond to a weekly basis:

"The Discharger shall visually inspect the effluent storage pond on a daily basis and record the depth and volume of stored effluent, and the volume of remaining available storage on a weekly basis."

Please note that daily visual monitoring is still required.

Staff Response to Comment 3 (Draft Monitoring and Reporting Program):

Paragraph E.2 of the Monitoring and Reporting Program has been modified as follows to require disposal area monitoring only on days during which discharges occur:

"The Discharger shall inspect the land application disposal area(s) no less frequently than daily during discharge events to verify and document compliance with Order No R3-2007-0008. The visual inspections shall be noted in a bound inspection logbook(s) and at a minimum shall document proper sprinkler operation, runoff, erosion, saturated surface conditions, and odors. Notations shall also be made in the logbook(s) for days on which no discharge occurred (visual inspection not required). The logbook(s) shall be made available to the Regional Board and Monterey County Department of Environmental Health upon request. A summary of observations made during land application disposal area inspections and a brief discussion of any corrective actions taken or planned shall be included with each annual monitoring report."

**RECOMMENDATION**

Adopt Order No. R3-2007-0008 as proposed.

**ATTACHMENTS**

1. Waste Discharge Requirements Order No. R3-2007-0008
2. Monitoring and Reporting Requirements Order No. R3-2007-0008
3. Waste Discharge Requirements Order No. 95-23 and Monitoring and Reporting Program No. 95-23
4. January 4, 2007, letter from Mr. Thomas Adcock, California Utilities Service, Inc., regarding "Draft Order"