

**22 April 2021 BOARD MEETING
CONTESTED AGENDA ITEM**

AGENDA ITEM: 10

SUBJECT:

Sacramento Regional County Sanitation District, Sacramento Regional Wastewater Treatment Plant

BOARD ACTION:

Consideration of NPDES Permit Renewal (NPDES Permit CA0077682)

BACKGROUND:

The Sacramento Regional County Sanitation District (Discharger) is the owner and operator of the Sacramento Regional Wastewater Treatment Plant (Facility), a publicly owned treatment works located at 8521 Laguna Station Road, Elk Grove, California. The Facility provides sewerage services for the Cities of Sacramento, Folsom, and West Sacramento, the communities of Courtland and Walnut Grove, and the Sacramento Area Sewer District. The Sacramento Area Sewer District service area includes the Cities of Elk Grove, Rancho Cordova, Citrus Heights, as well as portions of the unincorporated areas of Sacramento County. The population served is approximately 1.61 million people. The design average dry weather flow capacity of the Facility is 181 million gallons per day. The Facility discharges to the Sacramento River, a water of the United States, just downstream of the Freeport Bridge via an outfall diffuser and is regulated by Waste Discharge Requirements Order R5-2016-0020-01 (NPDES No. CA0077682), issued by the Central Valley Regional Water Quality Control Board (Central Valley Water Board) on 21 April 2016 and amended by Order R5-2018-0058 on 2 August 2018.

An Order is proposed to renew Order R5-2016-0020-01 (NPDES No. CA0078948). The proposed Order includes new or updated effluent limitations for ammonia, chlorodibromomethane, copper, cyanide, dichlorobromomethane, electrical conductivity, and nitrate plus nitrite. The proposed permit will remove existing effluent limitations for carbon tetrachloride and methylene chloride because the discharge does not demonstrate reasonable potential to cause or contribute to in-stream

exceedances of the applicable water quality objectives for these constituents.

ISSUES:

The tentative Order was issued for a 30-day public comment period on 2 February 2021 with comments due by 5 March 2021. Public comments were received from the Discharger. Central Valley Water Board staff have modified the proposed Order based on the comments received. Below is a summary of the significant comments and staff responses. Details are provided in the Staff Response to Comments document included in the agenda package.\

Bis(2-ethylhexyl) phthalate. The Discharger commented that the decision within the Tentative Order to find the January 2017 through February 2020 dataset insufficient and instead rely on the dataset from the previous permit renewal (2012-2014) is not a proper application of the State's *Policy for Implementation of Toxics for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (SIP), that there is no reasonable potential for bis(2-ethylhexyl) phthalate, and effluent limitations for bis(2-ethylhexyl) phthalate should be removed from the proposed Order.

Central Valley Water Board staff concurs in part. Staff concurs that the older effluent dataset should not be used in the proposed Order to support a finding of reasonable potential for bis(2-ethylhexyl) phthalate to cause or contribute to an exceedance of water quality objectives in the receiving water. However, staff do not concur that the bis(2-ethylhexyl) phthalate effluent limitations should be removed. The January 2017 through February 2020 data provided in the Discharger's Report of Waste Discharge is insufficient to conduct a reasonable potential analysis and does not justify less stringent effluent limitations for bis(2-ethylhexyl) phthalate in the proposed Order under the federal anti-backsliding regulations. Therefore, the proposed Order carries forward the bis(2-ethylhexyl) phthalate effluent limitations from previous Order R5-2016-0020-01.

Escherichia coli (E. coli) Organisms. The Discharger requested a unit change for E. coli organisms from colony forming units (CFU)/100 mL to most probable number (MPN)/100 mL for both the bacteria receiving water limitations (Section V.A.1) and the receiving water monitoring requirements (Attachment E, Section VIII.A.1, Table E-7) to allow the use of

Environmental Laboratory Accreditation Program (ELAP) approved methods for E. coli organisms.

Central Valley Water Board staff concurs in part. Staff concur that to be consistent with ELAP approved methods for E. coli organisms the receiving water monitoring requirements should allow reporting in the units of MPN/100 mL. The units of CFU/100 mL and MPN/100 mL for E. coli organisms are comparable units of measurement and may be used interchangeably. Table E-7 of the Tentative Order has been revised to allow reporting for E. coli organisms in either MPN/100 mL or CFU/100 mL. However, to be consistent with the Statewide Bacteria Objectives, the bacteria receiving water limitations will remain in units of CFU/100 mL.

RECOMMENDATION:

Adopt the proposed NPDES permit renewal.

REVIEWS:

Management Review:	AWL 25 March 2021
Legal Review:	BTD 1 April 2021

BOARD MEETING LOCATION:

☒ Internet Zoom Meeting