

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

STAFF SUMMARY REPORT (Tong Yin)
MEETING DATE: October 19, 2005

ITEM 10

SUBJECT: **City of Petaluma, Water Pollution Control Plant, Sonoma County** – Reissuance of NPDES Permit

CHRONOLOGY: July 1998 – Permit reissued

DISCUSSION: This item would reissue the City of Petaluma's NPDES permit. The City owns a wastewater treatment plant with a capacity of 5.2 million gallons per day (mgd). This plant treats wastewater from the City and nearby unincorporated areas. In the wet season, its treated wastewater is discharged to Petaluma River. In the dry season, its treated wastewater is not discharged, but rather, reused for irrigation (e.g., golf courses, vineyards) within the watershed.

The City has just begun construction on a new \$110 million treatment plant to both improve treatment reliability and increase capacity to 6.7 mgd. The new plant will use constructed wetlands to further treat and polish effluent before final discharge. The City plans to also use these wetlands to provide recreational and educational opportunities for the public. The new plant is projected to be operational in 2008.

We received comment letters (Appendix B) on the draft Tentative Order (T.O.) from the City, U.S. EPA, and San Francisco Baykeeper. Most issues raised have been resolved, some with revisions to the T.O., as described in the Response to Comments (Appendix C). The attached Revised T.O. (Appendix A) reflects all these changes.

One issue raised concerns the limit for Total Coliform bacteria. U.S. EPA and Baykeeper commented that the City's current limit (23 MPN/100ml), proposed to be continued in its reissued permit, is not consistent with a more stringent limit (2.2 MPN/100ml) in the Basin Plan. The City's current limit has been effective since its initial permit in 1974, based on health department recommendations from that time.

We propose continuing to grant the City an exception to the Basin Plan's 2.2 MPN limit. The Basin Plan allows for such an exception if

the City can demonstrate that its discharge does not compromise beneficial uses. The City provided evidence, included in the permit package, demonstrating that its discharge currently meets the Basin Plan's water quality objectives for total coliform bacteria, and is of better quality than ambient Petaluma River water. We believe an exception is justified.

Two other notable comments from U.S. EPA and Baykeeper related to the legal authority for compliance schedules for toxic pollutants, and Baykeeper's concern with allowing pollutant mass offsets. They have raised these similar concerns on the East Bay MUD wet weather facilities permit the Water Board adopted last month. As with that permit, we have appropriately applied the authority granted by the State Implementation Policy and our Basin Plan that allows compliance schedules. Also, the T.O.'s mass offset provision is appropriate because it is optional, and would need separate Board approval before any implementation.

**RECOMMEN-
DATION:**

Adoption of the Revised Tentative Order

FILE NUMBER: 2149.4006A

APPENDICES:

- A. Revised Tentative Order
- B. Comments Received
- C. Response to Comments