

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

STAFF SUMMARY REPORT (Christine Boschen)
MEETING DATE: August 8, 2007

ITEM: 7

SUBJECT: **Sausalito-Marín City Sanitary District, Wastewater Treatment Plant, Sausalito, Marin County** - Hearing to Consider Mandatory Minimum Penalty for Discharge in Violation of Effluent Limitations

CHRONOLOGY: Mandatory Minimum Penalties assessed in 2003, 2001, and 2000.

DISCUSSION: The District violated its permit 72 times from March 2004 to March 2007. Of those violations, 68 are subject to a mandatory minimum penalty. In May 2007, we issued a complaint to the District assessing \$204,000 in mandatory minimum penalties.

Most of the violations were of technology-based limits, including multiple violations of total suspended solids and biochemical oxygen demand. The District has hired a consultant, who has evaluated the causes of the ongoing violations. The two main causes are excessive flows coming into the plant, and insufficient treatment units at the front end of the plant. U.S. EPA issued an Administrative Order (in coordination with this order—Appendix B), which requires plant upgrades to fix the problems that have been causing these violations. Because the District has taken steps to identify the causes of the problems and because U.S. EPA's Administrative Order requires the problems to be corrected, staff finds that the minimum monetary penalties are sufficiently stringent.

The District has signed a waiver to a hearing (Appendix C), and has submitted two concept proposals for a supplemental environmental project (Appendix D), one of which staff finds conditionally acceptable. That project would fund an inspection and repair program for private sewer laterals, in the Gate Five neighborhood of Sausalito, which has had infiltration and inflow problems. Staff is currently working with the District to determine the project details, and whether it is a feasible project for the District to undertake at this time.

RECOMMEN-
DATION: No action required.

File No.: 2159.5023 (CEB/MLZ)

Appendix: A. Complaint No. R2-2007-0018
B. USEPA's Administrative Order
C. Signed waiver
D. SEP Proposals