

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

STAFF SUMMARY REPORT (Vincent Christian)
MEETING DATE: August 8, 2007

ITEM: 8 A & B

SUBJECT: **Sausalito-Marín City Sanitary District, Wastewater Treatment Plant and Its Collection System, Sausalito, Marin County** - Reissuance of NPDES Permit (8A) and Hearing to Consider Cease and Desist Order for Discharge in Violation of Waste Discharge Requirements (8B)

CHRONOLOGY: July 2000 - NPDES Permit Reissued

DISCUSSION: The Sausalito-Marín City Sanitary District (District) owns and operates a wastewater treatment plant that services Sausalito and the surrounding areas. This item reissues the District's NPDES permit that allows the District to discharge secondary treated wastewater to Central San Francisco Bay. The new permit would establish more stringent effluent limits for a number of toxic pollutants with which the District cannot immediately comply. To address these threatened violations, we have developed a cease and desist order (CDO) for your consideration in conjunction with the permit. The CDO establishes tasks and time schedules for the District to address the threatened violations.

The District and the Bay Area Clean Water Agencies (BACWA) commented (Appendix C), on a tentative order and a tentative CDO distributed in June. We responded to these comments (Appendix D), and made appropriate changes which are reflected in the attached Revised Tentative Order and the Revised Tentative Cease and Desist Order (Appendices A and B). The District and BACWA share most of the same concerns, many of which are not appropriate to accommodate with their suggested revisions. Their concerns about the tentative order relate to the inclusion of (1) an enforceable schedule for plant improvements to reduce bypasses during peak wet weather (or "blending"), (2) final limits for dioxin, cyanide, mercury, and chlordane, and (3) requirements for a pollution prevention program. Their main concern about the tentative CDO is that the tasks are overly burdensome to the District.

It is consistent with federal law to require the District to develop a program to reduce or eliminate blending events. On final limits for dioxin, cyanide, mercury, and chlordane, as reported at previous Board meetings, those limits must be included to comply with existing regulations. On the pollution prevention program, we think it is appropriate that all facilities, including small facilities such as the District, develop and implement pollution prevention programs. Finally, on the tentative CDO, the tasks required are necessary and reasonable to ensure compliance with effluent limits we are

legally mandated to enforce. We anticipate that both the District and BACWA will reiterate their concerns at the Board meeting.

RECOMMEN-
DATION:

Adoption of the Revised Tentative Order and the Revised Tentative Cease and Desist Order

File Number: 2159.5023 (vc)

Appendices:

- A. Revised Tentative Order
- B. Revised Tentative Cease and Desist Order
- C. Correspondence
- D. Response to Comments