

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

**STAFF REPORT FOR REGULAR MEETING OF MAY 12-13, 2005**

Prepared on April 26, 2005

**ITEM NO:** 19

**SUBJECT:** Revised Waste Discharge Requirements for City of Santa Cruz, Santa Cruz County, Waste Discharge Requirements Order No. R3-2005-0003. (NPDES Permit No. CA 0048194)

**KEY INFORMATION:**

Treatment System Location:	City of Santa Cruz, Santa Cruz County
Discharge Type:	Industrial and domestic wastewater
Design Capacity:	17.0 million-gallons-per-day (MGD)
Average Flow:	9.8 MGD
Treatment:	Secondary
Disposal:	Ocean outfall
Reclamation:	None
Existing Orders:	NPDES Order No. 00-04

**SUMMARY**

The City of Santa Cruz (hereafter Discharger) owns and operates a treatment plant and ocean outfall to treat and dispose of municipal wastewater from the City and County Sanitation Districts. The City of Scotts Valley adds its treated wastewater to the Discharger's effluent for combined disposal to the Pacific Ocean. Proposed Order and Monitoring and Reporting Program (MRP) No. R3-2005-0003 specify changes to bacterial analyses and improved sampling and analysis methods for effluent toxic pollutants. The proposed Order no longer regulates the County of Santa Cruz's portion of the collection system discharging to the treatment plant. Separate waste discharge requirements will regulate the County Sanitation District's collection system.

**BACKGROUND**

**Wastewater Treatment Plant.** The Discharger owns and operates a wastewater collection, treatment, and disposal system to provide service to sewer portions of the City and areas of Santa Cruz County. The plant also treats dry weather flows from Neary Lagoon, septage from unsewered areas, and grease trap pumping.

The plant provides secondary wastewater treatment by means of screening, aerated grit

removal, primary sedimentation, trickling filters, solids contact, secondary clarification, and disinfection with ultraviolet light. Treated wastewater is discharged to the Pacific Ocean through the Discharger's outfall/diffuser system. The outfall terminates about one mile offshore in approximately 110 feet of water. The diffuser is 2,100 feet long and provides a minimum initial dilution ratio (dilution ratio) of 139:1 (seawater to effluent ratio). The locations of the treatment plant and outfall are shown on Attachments A and B.

The Discharger treats waste biosolids by anaerobic digestion and transports stabilized solids to the San Joaquin Valley for reuse as soil amendment on agricultural lands. Waste discharge requirements adopted by the Central Valley Regional Water Quality Control Board regulate the biosolids application to land. The plant combusts methane gas generated by anaerobic biosolids digestion to generate electricity for plant uses. Design average daily flow is 17 million gallons per day (MGD), and design peak wet weather flow is 81 MGD. The reported 2004 annual average daily flow was 9.8 MGD, the average dry weather flow was 8.8 MGD, and the peak wet weather flow was 32 MGD.

## COMPLIANCE HISTORY

The Discharger has maintained excellent compliance with Order No. 00-44's waste discharge requirements.

## DISCUSSION

### WASTE DISCHARGE REQUIREMENTS

The proposed Order adds superscripts to waste discharge requirements to identify their origin. The proposed Order includes requirements from the California Ocean Plan (*2001 Water Quality Control Plan for Ocean Waters of California*), the Basin Plan (*the Central Coast Region Water Quality Control Plan*), and federal regulations listed in 40CFR122 and 40CFR133. Requirements without superscript are based on staff's professional judgment.

**Effluent Limitations.** The proposed Order's Prohibitions (Section A.1) limit discharge to the ocean outfall and to Board-approved water reuse sites. The Discharger currently does not have a water reuse program and has stated delivery of recycled water may be infeasible due to high costs and a lack of potential reuse sites. Prohibition A.2 prohibits the discharge of radiological, warfare agents or radioactive wastes.

The outfall discharges within the Monterey Bay National Marine Sanctuary. The discharge must meet Ocean Plan requirements for pollutants listed in Table B outside a "zone of initial dilution" (dilution zone) around the outfall diffuser. Municipal wastewater is quite buoyant compared to the marine waters around the outfall. The combination of the wastewater's buoyancy and discharge velocity causes its initial mixing with seawater to be rapid and effective. The Ocean Plan defines the dilution zone as the region in which the rapid initial mixing occurs.

USEPA-approved computer models are employed to estimate the minimum initial dilution ratio (dilution ratio) of seawater to effluent achieved during the initial mixing phase in the dilution zone. The dilution ratio is used to determine the maximum concentrations of the specified Ocean Plan constituents allowed in the wastewater before it is discharged. The proposed Order applies a dilution ratio of 139:1 to the discharge to determine effluent limitations for the Ocean Plan's Table B constituents.

In Section B, the proposed Order's effluent limitations restrict the discharge of pollutants listed in the Ocean Plan's Tables A and B. Table A pollutants include Carbonaceous Biochemical Oxygen Demand (CBOD), suspended and settleable solids, oil and grease, turbidity, pH, fecal and total coliform, and enterococcus. Table A specifies effluent limitations for bacteria based on the dilution ratio.

The California Department of Health Services (DHS) issued guidelines for wastewater discharge to ocean waters. In accordance with the guidelines, the discharge is considered a remote ocean discharge. DHS guidelines recommend no disinfection for remote discharges, provided recreational waters meet Ocean Water Contact Sports Area Standards. Accordingly, the proposed Order requires the effluent coliform and enterococcus limitations to apply only if a bacterial assessment conducted in accordance with the MRP demonstrates violations of Receiving Water Limitation C.1.

Based on the dilution ratio, the proposed Order's Tables B.2.a and B.2.b specify effluent limitations for toxic pollutants listed in the Ocean Plan.

**Receiving water limitations.** Receiving Water Limitation C.1 limits bacteria to standards for body-contact recreation proposed in the Final Functional Equivalent Document issued on December 21, 2004, by the State Water Resources Control Board (State Board). The State Board will likely adopt the proposed standards at a public meeting since all comments on the limits have been addressed. The receiving water limitation is consistent with the California Code of Regulations Title 22 requirements. The receiving water limitation requires the Discharger to sample weekly at ocean sampling stations specified in the MRP's Table 8 and to compute the geometric mean based on the last five weekly samples. Also in accordance with the FED, the proposed Order limits bacteria in the ocean to less than Single Sample Maximums. The proposed Order also limits total coliform to Ocean Plan standards adopted to protect the Shellfish Harvesting beneficial use.

Narrative receiving water limitations ensure the discharge does not impair the ocean's beneficial

uses by adversely altering its physical, chemical or biological characteristics.

**Collection System Management Plan.** The proposed Order requires the Discharger prepare a Collection System Management Plan (CSMP) to reduce collection system spills. The Discharger has not suffered an excessive number of spills and its spills have not impaired the beneficial uses of either inland or marine surface waters. The small number of spills and their negligible adverse effects are a likely result of the Discharger's existing management program. The proposed Order requires the Discharger to report its program to the Board, in detail, in the CSMP.

**Pretreatment.** The proposed Order includes standard Pretreatment Program requirements. The Discharger conducts an approved program, audited by the Board through inspections currently conducted by Tetra Tech. Tetra Tech will audit the Discharger's program in 2005.

**Biosolids.** As a service to the Discharger, the proposed Order advises the Discharger of its responsibility to comply with biosolids disposal requirement specified in the Code of Federal Regulations. USEPA enforces federal regulations governing the Discharger's disposal of biosolids.

**Provisions.** The proposed Order's Provisions rescind the existing Order and require the Discharger to comply with the MRP and the Standard Provisions, and to file an application to renew the NPDES Permit at least 180 days before the permit expires. Provision G.5 requires the Discharger to conduct a bacterial assessment and to take remedial action if three effluent samples contain more than 100,000 bacteria per 100 mL. Provision G.6 requires the Discharger to conduct a Toxicity Reduction Evaluation if the discharge consistently exceeds effluent toxicity limits. The discharge has not exceeded the limits.

In accordance with the Ocean Plan, Provision G.7 requires the Discharger to develop a Pollutant Minimization Program (PMP). The PMP would include a strategy to control sources of persistent organic pollutants if they are detected in the effluent.

## CHANGES TO WASTE DISCHARGE REQUIREMENTS

Based on a study conducted by the Discharger, the State Water Resources Control Board approved increasing the minimum initial dilution ratio from 114:1 to 139:1. This Order's effluent limitations for Ocean Plan Table B pollutants (in Tables B.2.a and B.2.b) reflect the increased dilution ratio. Provision G.7 requires the Discharger to develop a Pollutant Minimization Program to address persistent organic pollutants found in treatment plant effluent, if any, by the new integrative high-volume water sampling technique (HVWS).

The Discharger will report bacteria concentrations in effluent and receiving water in terms of Colony Forming Units/100 mL instead of Most Probable Number/100 mL. The Discharger proposed the change to reduce the time required to report analytical results after sampling. As discussed above, Receiving Water Limitation C.1 specifies the new Ocean Plan Water-contact Standards for bacteria. Table A bacteria Effluent Limitations now apply only when ocean monitoring in accordance with the monitoring and reporting program detects exceedance of Receiving Water Objectives. The proposed Order now requires the discharger to develop and implement an updated and appropriate Collection System Management Plan. The latter two changes provide consistency with other dischargers to Monterey Bay, including Monterey Regional and the City of Watsonville.

## MONITORING AND REPORTING PROGRAM

The purpose of Monitoring and Reporting Program (MRP) No. R3-2005-0003 is to determine compliance with the Order's prohibitions and limitations. The proposed MRP requires influent monitoring of flow, pH, CBOD, solids and toxic pollutants via the 30-day integrative high volume water sampling procedure (HVWS).

**Effluent Monitoring.** Effluent monitoring is needed to:

- Determine compliance with NPDES permit conditions,
- Help identify operational problems to improve plant performance, and
- Provide information on waste characteristics and flows.

The proposed MRP requires effluent monitoring for the major wastewater constituents and properties, including the constituents listed above for influent monitoring. The Discharger also

monitors effluent for bacteria, chlorine residual, and acute and chronic toxicity, among others. Effluent monitoring for bacteria is required only if the bacterial assessment demonstrates exceedance of bacterial receiving water limitations. As a service to the Discharger, the proposed MRP describes the acute and chronic toxicity test procedures and species in detail.

The proposed MRP requires the Discharger to monitor the effluent for the Ocean Plan's toxic pollutants. The Discharger shall employ the HVWS procedure semiannually. Please see additional discussion below under *Changes to the Monitoring and Reporting Program*.

**Receiving Water Monitoring.** Receiving water monitoring is needed to:

1. Obtain data showing the status and long-term pollutant trends of nearshore waters and sediments,
2. Determine whether nearshore waters and sediments comply with the Order's limitations,
3. Help determine pollutant sources of nearshore waters,
4. Provide legally defensible data on the effects of wastewater discharges in nearshore waters, and
5. Develop a long-term database on trends in the quality of nearshore waters, sediments, and associated beneficial uses.

Accordingly, the MRP requires bacterial monitoring at the 30-foot depth contour and the Discharger to continue to participate in Central Coast Ambient Monitoring Program's (CCAMP's) Central Coast Long-term Environmental Assessment Network (CCLEAN). CCLEAN includes sampling of the sediment, benthic biota, mussels for bioaccumulation, streams and river mouths, and effluent and rivers using integrative solid phase extraction columns.

### **MINIMUM LEVELS**

The 2001 California Ocean Plan establishes Minimum Levels (MLs) and the associated analytical methods for Discharger reporting. The specification of MLs provides more certainty and consistency to compliance determination, especially in cases where the effluent limitation is far less than the analytical method's detection limit.

MLs are the lowest quantifiable pollutant concentrations resulting from analytical procedures in the absence of interferences. MLs also represent the lowest standard concentration in the calibration curve for a specific analytical technique after the application of appropriate method-specific factors. The Ocean Plan discusses MLs in more detail.

In accordance with the Ocean Plan, this MRP includes MLs less than the effluent limitations of Order No. R3-2005-0003. In instances where a ML exceeds an effluent limitation, the MRP specifies the lowest ML. MLs not meeting either of these criteria were omitted, indicated by "N/A"

### **Deviations from Minimum Levels in Appendix II (of the Ocean Plan)**

The Regional Board, in consultation with the State Water Board's Quality Assurance Program, must establish a ML to be included in the permit in any of the following situations:

1. A pollutant is not listed in Appendix II (of the Ocean Plan).
2. The discharger agrees to use a test method that is more sensitive than those described in 40 CFR 136 (revised May 14, 1999).
3. The discharger agrees to use a ML lower than those listed in Appendix II (of the Ocean Plan).
4. The discharger demonstrates that their calibration standard matrix is sufficiently different from that used to establish the ML in Appendix II (of the Ocean Plan) and proposes an appropriate ML for their matrix.
5. A discharger uses an analytical method having a quantification practice that is not consistent with the definition of ML.

As a service to the Discharger, the proposed MRP lists the Ocean Plan's MLs in Tables 10 through 13. The proposed MRP also specifies sample reporting and compliance determination protocols.

The proposed MRP describes how the Discharger will monitor pollutant concentrations in biosolids from the plant and report the results. The proposed MRP describes protocols for reporting collection system spills, pretreatment program findings, and spill prevention program reporting. The proposed MRP also describes collection system spill recordkeeping requirements.

## CHANGES TO MONITORING AND REPORTING PROGRAM

**High volume water sampling (integrative sampling).** Some synthetic chlorinated hydrocarbons strongly resist bacterial degradation. Therefore, these compounds persist in the environment, some essentially forever. These Persistent Organic Pollutants (POPs) include dioxins, chlorinated pesticides, and polychlorinated biphenyls (PCBs). POPs accumulate in fatty tissues of higher aquatic life forms as they prey on lower forms, and can thereby increase to levels that cause cancer and mutations. Consequently, Congress banned the production and use of chlorinated pesticides and PCBs. Dioxins are byproducts of high temperature or highly corrosive processes. Almost all POPs are found in surface waters, typically at low levels but sometimes exceeding water quality standards. The California Ocean Plan specifies very low water quality objectives for all POPs because of their ability to bioaccumulate to toxic levels. For example, for dioxin (by far the lowest limit) the Ocean Plan limit is approximately 4 billionths of a millionth of a gram per liter of seawater ( $3.9 \times 10^{-9}$   $\mu\text{g/L}$  or  $3.9 \times 10^{-15}$   $\text{g/L}$ ).

Effluent and receiving water monitoring conducted by this Region's CCLEAN has continually found POPs. (CCLEAN does not monitor dioxins, however). CCLEAN is able to detect the POPs by employing integrative high volume water sampling (HVWS) instead of the usual 24-hour composite of 24 discrete grab samples. In CCLEAN's HVWS, for 30 days a constant-flow effluent stream split from the plant's discharge is passed, after filtration, through a column packed with a resin, which captures all the POPs in the split stream. Sampling is conducted over two 30-day periods, one in summer and one in winter. The mass of each POP is determined by standard analysis of the extract from the resin and filter. Knowing the volume of wastewater from which the POPs were obtained, the average concentration in the wastewater of each POP can then be determined.

The Discharger proposes to employ a similar equivalent sampling procedure, using a semi-permeable membrane device. The Discharger chose this approach because its use is well known and widely reported in the scientific literature, it's easy to deploy for effluent sampling and it

efficiently accumulates POPs, the compounds of interest.

HVWS over two 30-day intervals every year provides a much more representative sample than the 24-hour composite, which is composed of 24 small grab samples. The pollutant is usually present in the extract in amounts that are detectable by standard analytical procedures. Moreover, when the large sample volume (200 L) is factored in, very low concentrations can be demonstrated. CCLEAN is thereby able to report effluent POP concentrations on the order of 10  $\text{pg/L}$  ( $10 \times 10^{-12}$   $\text{g/L}$ ). No effluent POP concentration has exceeded its effluent limitation, which is on the order of 10  $\text{ng/L}$  ( $10 \times 10^{-9}$   $\text{g/L}$ ).

24-hour composite effluent samples from some of this Region's plants (obtained in accordance with the Board's monitoring and reporting programs) have occasionally detected dioxins, sometimes in greater concentrations than permit limitations. These sporadic results indicate the presence of dioxins in municipal plant effluent. Published studies have found possible dioxin sources to be bleached paper such as toilet tissue and wastewater plant chlorination processes.

As specified in Monitoring and Reporting Program (MRP) No. R3-2005-003, the Discharger will use HVWS to sample the Discharger's entire effluent flow over two 30-day periods each year, clearly substantially more representative than semiannual 24-hour effluent composites. Furthermore, HVWS allows substantially lower detection limits to be obtained than possible by analyzing grab samples. When analyzing the usual grab sample volume, EPA Method 1613B achieves approximately 10  $\text{pg/L}$  as the lower limit of detection, which exceeds, for example, the Discharger's dioxin effluent limit of 0.55  $\text{pg/L}$ . Therefore, HVWS provides the only means of detecting dioxins at levels below permit limits, and at levels above permit limits but below the grab sample detection limit; i.e. from 0.001  $\text{pg/L}$  to 10  $\text{pg/L}$ . HVWS has detected dioxin at 0.001  $\text{pg/L}$  in water, which is well below the effluent limitation.

In summary, sporadic data demonstrate dioxin's presence in discharges from municipal treatment plants to the ocean. However, the detection limits for analyses of small grab samples have been higher than effluent limitations specified in

discharge permits. Therefore, municipal plants may have discharged, and may now discharge, dioxins at levels well above established effluent limitations based on the current Ocean Plan. Analyses of 24-hour composite samples cannot detect dioxins at lower levels than two orders of magnitude greater than the effluent limitations in the proposed Order. However, HVWS can establish detection limits well below effluent limits, thereby allowing determination of compliance.

As stated earlier, if monitoring the Discharger's effluent finds dioxins or other POPs at levels greater than the permit's effluent limitations, the proposed Order's Provision G.7 requires the Discharger to develop a Pollutant Minimization Program to address the issue.

### REASONABLE POTENTIAL ANALYSIS

Federal regulations governing the Federal and State NPDES permit program require that NPDES permits contain effluent limitations for all pollutant parameters that:

"...may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality. (40 CFR sec. 122.44 (d)."

Due to the nature of operations occurring at the wastewater treatment system, there is a reasonable potential for certain constituents to be discharged to the Pacific Ocean in concentrations that could cause an excursion above State water quality standards. The Discharger conducted a reasonable potential analysis of the plant effluent and found such reasonable potential exists for some Ocean Plan pollutants. To ensure excursions will not occur, the proposed NPDES permit contains numeric effluent limitations and prohibitions for these constituents in accordance with 40 CFR section 122.44(d). The proposed Order also complies with Water Code section 13263, and contains effluent limitations that implement water quality objectives in the Basin Plan. These include the anti-degradation policy, numeric water quality objectives, and narrative water quality objectives.

### ANTI-BACKSLIDING

Title 40, Code of Federal Regulations Modifications, Section 122.44(l), requires effluent limitations for reissued NPDES permits be at least as stringent as the previous permit, unless certain grounds for "backsliding" apply. All changes to the effluent limitations in the proposed Order were made in accordance with Anti-Backsliding provisions.

### ENVIRONMENTAL SUMMARY

The issuance of waste discharge requirements for this discharge is exempt from provisions of the California Environmental Quality Act (Division 13 of the Public Resources Code, Chapter 3 commencing with Section 21100, et. Seq.) in accordance with Section 13389 of the California Water Code.

### COMMENTS

On **January 20, 2005**, the Board notified the Discharger and interested agencies and persons of its intent to revise portions of waste discharge requirements for the discharge, and provided them with an opportunity to submit their written views and recommendations. On **February 2, 2005**, the Discharger posted the Public Notice in the post office and in Santa Cruz Sentinel, a local newspaper of general circulation.

1. City of Santa Cruz.
  - a. The Discharger reports it must, on rare occasions, determine microbe concentrations using the Multiple Tube Fermentation (MTF) procedure. The draft permit requires use of only the Membrane Filtration procedure. Staff response. The procedures are equivalent. Staff modified the proposed Order and the MRP to allow use of the MTF procedure, by adding the following footnote to the Order's Table A – Effluent Limitations:
 

"h. The Discharger may determine microbial concentrations by means of the Multiple Tube Fermentation procedure, with results reported as Most Probable Number (MPN)/100 mL."
  - a. The Discharger normally disinfects its effluent with ultraviolet (UV) light but must use chlorine during power failures or when the UV system fails. The Discharger proposes to

report its effluent chlorine residual as an instantaneous maximum of a lognormal distribution, as discussed in a February 3, 1998 letter from the U.S. EPA. According to the letter, the proposed approach is consistent with procedures provided in the Technical Support Document for Water-Quality Based Toxics Control.

Staff response. As of April 5, 2005, the Discharger has provided no justification or specifications for the proposed method, notwithstanding staff urging them to do so. Therefore, staff can recommend no changes to the current procedure for determining the instantaneous maximum for a continually read measurement. That is, the instantaneous maximum is the highest point scribed by the pen on a continuous strip chart recorder.

- b. Based on review of its effluent quality data, the Discharger proposes to retain the sampling frequency for Carbonaceous Biochemical Oxygen Demand (CBOD) influent and effluent at every sixth day instead of the twice weekly as proposed in the draft Order. The Discharger reports space and personnel constraints against increasing the frequency of analysis.

Staff Response: Staff concurs and changed the proposed MRP Table 1 and Table 2 accordingly.

- c. The Discharger is analyzing its effluent for Total Organic Carbon (TOC) and CBOD concentrations, hoping to substitute a TOC effluent limitation for the current CBOD limit. The Discharger has obtained too few data to reliably correlate the TOC data with the CBOD data. Therefore, the Discharger proposes to continue to collect data. If the data strongly correlate in the future, then the Discharger will request the Executive Officer approve the use of TOC as the effluent limitation instead of CBOD.

Staff Response: Staff concurs and added a the following footnote to the proposed Order's Effluent Limitations (Table A):

- i. If the Executive Officer (EO) agrees that the Discharger demonstrates an adequately robust statistical correlation between an adequate number of Total Organic Carbon (TOC) data and CBOD data, then the EO

may approve the use of TOC as the specified effluent limitation.

- e. The Discharger proposes to reduce the outfall inspection frequency from annually to once during the life of the permit. The Discharger states it has monitored the outfall's diffuser ports annually for fifteen years and has detected no adverse changes in port function over that time. The Discharger proposes annual dye studies instead.

Staff response. In addition to monitoring nozzle function, the goal of annual inspections is to ensure the outfall's structural integrity. That is, inspections determine if environmental forces cracked the outfall or moved pipeline segments so gaps form between them. Therefore, staff does not concur with the Discharger's proposal and recommends annual outfall inspections be retained.

- f. The Discharger proposes to eliminate the proposed Order's requirement in Section XI that all spill locations be determined via Global Positioning System (GPS) equipment, stating this would be expensive, time consuming, and would provide no useful information.

Staff response. Staff believes handheld GPS units to be relatively inexpensive and their use would take little time. The positional data are important for regional planning efforts and can be readily used in Geographic Information System (GIS) applications. Therefore, staff recommends the Board retain the GPS requirement.

- g. The Discharger proposes to eliminate the words "or where public contact is likely" from the proposed MRP's section XII (page 19).

Staff response. Staff does not concur because the Discharger can easily determine if members of the public are likely to contact spilled sewage, and it is important for Board staff to know about such events as soon as practically possible. Staff recommends the Board retain the requirement.

- h. The Discharger proposes to replace the words (Item 5 on page 19) in the MRP: "Spills under 1,000 gallons that do not enter a water body" with the following:

“ All spills including private lateral spills that the City has knowledge of”.

The section goes on to read “shall be reported to the Regional Board in writing and electronically within 30 days.”

Staff response. Staff concurs, because the new language is broader, covering all spills including private laterals. Staff changed the proposed MRP accordingly.

- i. The Discharger reported some minor errors, which staff corrected.
2. Monterey Bay National Marine Sanctuary
  - a. Sanctuary staff proposes the Board modify the proposed Order’s Item D.6 to prohibit the discharge of chlorine used by the Discharger to disinfect sites contaminated by spills of untreated municipal wastewater.
 

Staff response. The Discharger has suffered few spills, none significant and none to the ocean. Staff believes the Discharger, acting according to the provisions of Item D.6, will adequately protect the ocean’s beneficial uses and Sanctuary resources. Item D.6 follows: “The Discharger shall minimize the discharge of chlorine, or any other toxic substance used for disinfection and cleanup of wastewater overflows, to any surface water body. The Discharger shall take all reasonable steps to contain and prevent chlorine discharges to surface waters and minimize or correct any adverse effects on water quality resulting from the cleanup of overflows.” A prohibition is unnecessary.
  - b. Sanctuary staff request the Discharger report spills likely to enter ocean waters to 1-888-902-2778.
 

Staff response. Staff recommends the Discharger comply with Sanctuary staff’s request.
3. Santa Cruz County Environmental Health Services – No response
4. California Department of Fish and Game – No response.

## RECOMMENDATION

Adopt WDRs Order and MRP No. R3-2005-0003, as proposed

## ATTACHMENT

1. Draft NPDES Order No. R3-2005-0003
2. Monitoring and Reporting Program No. R3-2005-0003.

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