

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

STAFF REPORT FOR PUBLIC MEETING OF MAY 12-13, 2005

Prepared on March 23, 2005

ITEM: 25

SUBJECT: Issuance of Waste Discharge Requirements (WDRs) for Wastewater Collection Agencies Tributary to the City of Santa Cruz Wastewater Treatment Facility, Santa Cruz County – Order No. R3-2005-0043

KEY INFORMATION

Permittees: Santa Cruz County Sanitation District
Location: Parts of Santa Cruz County next to the City of Santa Cruz
Discharge Type: Municipal wastewater
Type of Waste: Municipal wastewater
Discharge Capacity: Variable
Treatment: None
Disposal: To City of Santa Cruz's Wastewater Treatment Facility
Reclamation: Not applicable
Existing Order: NPDES Permit CA0048194 - WDRs Order No. 00-044

SUMMARY

In the past, the Board included waste discharge requirements for collection systems tributary to treatment plants in WDR Orders for the plants. To increase the Board's oversight of tributary systems, the proposed Order would directly regulate systems managed by agencies other than the plant operators. Proposed WDRs Order No. R3-2005-0043 would regulate the Santa Cruz County Sanitation District's (Permittee) management of the collection system tributary to the City of Santa Cruz's Wastewater Treatment Facility (Treatment Facility). Since March 31, 2000, National Pollutant Discharge Elimination System (NPDES) Permit CA0048194 (WDR Order No. 00-44) has regulated the Permittee and the City's wastewater discharge together. In the future, this agenda's proposed Order No. R3-2005-0003, if adopted, would regulate the City's discharge.

DISCUSSION

Background. On November 1, 2002, the Board adopted *WDR Order No. R3-2002-0078 for Local*

Sewage Collection Agencies Tributary to Monterey Regional Wastewater Treatment Plant, Monterey County. Staff advised the Board of plans to draft similar WDR Orders for other systems tributary to wastewater treatment plants. Subsequently, the Board adopted similar Orders regulating systems tributary to treatment plants, including Salsipuedes, Pajaro, and Freedom County Sanitation Districts in Santa Cruz County, in addition to fifteen others throughout the Central Coast Region.

Benefits of Order. Staff believes adoption of the proposed Order and Monitoring and Reporting Program will result in the following benefits:

- Encourage the Permittee to actively manage the collection system,
- Provide site-specific requirements directly to the Permittee,
- Improve the Board's ability to regulate each system independently,
- Improve reporting of monitoring data, and

- Improve Board staff's ability to determine compliance.

Causes of Overflows. The Permittee operates a wastewater collection system in Santa Cruz County tributary to the Treatment Facility. Well-designed, operated, and maintained systems should transport all collected wastewater to a treatment plant. However, every system experiences overflows.

Causes of overflows include:

- Inadequate system capacity,
- Excessive stormwater inflow,
- Excessive infiltration through cracks in old or misaligned pipelines,
- Pipeline blockages caused by root intrusion or grease buildup,
- Inadequate operation and maintenance, and
- Vandalism.

Overflows can threaten public health by contaminating surface waters or pooling on the ground.

Reducing overflows. Permittees can reduce or eliminate overflows by, among other measures;

- Cleaning and maintaining the collection system,
- Renovating or replacing pipelines, to reduce infiltration and inflow,
- Enlarging or upgrading pipelines or pump stations,
- Providing employee training,
- Reducing entry of unsuitable materials, such as root balls, through programs to educate plumbers and the public.

Some overflows are unavoidable. Unavoidable overflows may include those resulting from vandalism, pipeline blockages, extreme rainfall, and natural catastrophes.

Overflow History: In 2004, the system suffered five overflows to surface waters, ranging from 100 gallons to 410 gallons. Excessive stormwater inflow caused the largest overflow, rag and grease blockage caused two more, removal of a private lateral cleanout cap caused the fourth, and an air vent valve stuck in the open position caused the last. In all cases, the Permittee vacuumed up the

remaining overflow and washed down the area, when necessary. Staff finds these overflows were fairly small and, accordingly, posed a small threat to the public health. Board staff received no reports of illness caused by these overflows.

Beach Closure. In accordance with State statutes, the Santa Barbara County Health Department (County Health) monitors ocean waters at public beaches and water-contact recreation areas. County Health collects samples from sites near storm drains (including rivers, creeks and streams) visited by over 50,000 people annually. County Health analyzes the samples for bacteriological indicator organisms. Elevated indicator organism levels suggest pathogen contamination. Raw sewage contains millions of bacteria per 100 milliliters so overflows to beach waters often cause violations of public health standards for recreation. When levels of indicator organisms exceed State guidelines, County Health may post beaches with warning signs or close beaches to public access.

Collection System Management Plan. To help reduce overflows to surface waters, the proposed Order requires the Permittee to develop a Wastewater Collection System Management Plan (Management Plan). The Management Plan is a detailed and comprehensive strategy to reduce overflow frequency and their adverse effects. The Management Plan builds on the programs required by the previous WDRs Order, and provides for their integration as the Permittee develops the Management Plan. Monitoring and Reporting Program (MRP) Attachment 1 provides guidance on Management Plan contents.

Enforcement. The Water Code provides for discretionary penalties for unauthorized discharges, which usually include sewage overflows. The proposed Order does not change the Board's enforcement authority.

The proposed Order's goal is consistent with the Permittee's goal to minimize overflows by means of an active collection system management program. The proposed Order allows local sewerage agencies to document and expand established programs while continuing to improve collection system maintenance and operations.

ENVIRONMENTAL SUMMARY

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Sanitation District\R3-2005-0043 staff report.doc

These waste discharge requirements are for an existing facility and are exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 15301, Article 19, Chapter 3, Division 6, Title 14 of the California Code of Regulations

COMMENTS

1. Monterey Bay National Marine Sanctuary (MBNMS). In a March 7, 2005 letter, MBNMS Superintendent William J. Douros requested the Board require the Discharger, through Monitoring and Reporting Program No. R3-2005-0043, to send them copies of the following spill reports: the five-day notification required for spills that are greater than 1,000 gallons, or that occur where public contact is likely; spills less than 1,000 gallons that do not enter a water body; and the annual summary report.

Staff Response. Staff does not object to MBNMS staff's request, and added the appropriate language to the proposed MRP.

2. Santa Cruz County Sanitation District – No Response
3. California Department of Fish and Game – No response
4. Santa Cruz County Health Services – No response
5. City of Santa Cruz – No response

ATTACHMENTS

1. Proposed Order No. R3-2005-0043
2. Monitoring and Reporting Program (MRP) No. R3-2005-0043

RECOMMENDATION

Adopt Order and MRP No. R3-2005-0043 as proposed.