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**ATTACHMENT F – FACT SHEET**

As described in Section II of this Order, this Fact Sheet includes the legal requirements and technical rationale that serve as the basis for the requirements of this Order.

**I. PERMIT INFORMATION**

The following table summarizes administrative information related to the facility.

<b>WDID</b>	3 42 010 1001
<b>Discharger</b>	Carpinteria Sanitary District
<b>Name of Facility</b>	Carpinteria Sanitary District Wastewater Treatment Facility
<b>Facility Address</b>	5351 Sixth Street
	Carpinteria, CA 93013
	Santa Barbara County
<b>Facility Contact, Title and Phone</b>	Craig Murray, General Manager, (805) 684-7214
<b>Authorized Person to Sign and Submit Reports</b>	Craig Murray, General Manager, (805) 684-7214
<b>Mailing Address</b>	5300 Sixth Street, Carpinteria, CA 93013
<b>Billing Address</b>	5300 Sixth Street, Carpinteria, CA 93013
<b>Type of Facility</b>	POTW
<b>Major or Minor Facility</b>	Major
<b>Threat to Water Quality</b>	2
<b>Complexity</b>	A
<b>Pretreatment Program</b>	Yes, though not formally required
<b>Reclamation Requirements</b>	None
<b>Facility Permitted Flow</b>	2.5 Million Gallons per Day (MGD)
<b>Facility Design Flow</b>	2.5 Million Gallons per Day (MGD)
<b>Watershed</b>	South Coast Hydrologic Unit
<b>Receiving Water</b>	Pacific Ocean
<b>Receiving Water Type</b>	Saltwater

- A. Carpinteria Sanitary District (hereinafter Discharger) is the owner and operator of the Carpinteria Sanitary District Wastewater Treatment Facility (hereinafter Facility), a Publicly Owned Treatment Works (POTW), as shown on Attachment A (T4N, R25W, Sections 29 and 32, SB B&M). The Facility serves a population of 16,500 persons.
- B. The Facility discharges wastewater to the Pacific Ocean, a water of the United States, and is currently regulated by Order No. 00-001, which was adopted on July 14, 2000 and was scheduled to expire on July 14, 2005. By letter dated April 4, 2005, the Executive Officer administratively extended the Order until the Central Coast Water Board adopted a new Order.
- C. The Discharger filed a report of waste discharge and submitted an application for renewal of its Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) permit on January 14, 2005. Supplemental Information was requested on February 9, 2005, and received on February 17, 2005. Staff conducted a routine facility inspection on June 8, 2005.

## II. FACILITY DESCRIPTION

- A. Description of Wastewater and Biosolids Treatment or Controls** – The treatment system consists of pretreatment, screening, grit removal, primary sedimentation, aerated activated sludge tanks, secondary sedimentation, chlorination, and dechlorination. The design average dry weather flow rate is 2.5 MGD. The average daily flow rate over the last three years was 1.4 MGD. Biosolids are managed via thickening, aerobic digestion, and belt presses. Biosolids are composted and applied to land for agricultural purposes within the Central Valley in accordance with Waste Discharge Requirements Order No. R5-2002-0172 issued by the Central Valley Regional Water Quality Control Board to San Joaquin Composting, Inc., and McCarthy Family Farms, Inc., Operation Lost Hills Composting Facility.
- B. Discharge Points and Receiving Waters** – Wastewater is discharged to the Pacific Ocean through a 1,000-foot outfall/diffuser system. The outfall (Discharge Point 001) terminates in the Santa Barbara Channel / Pacific Ocean (34°23'18" N. Latitude, 119° 31'18" W. Longitude) in approximately 25 feet of water. The hydraulic capacity of the outfall is 5.5 MGD. The minimum initial dilution ratio of seawater to effluent is 93:1.
- C. Compliance Summary** – Central Coast Water Board records indicate the Discharger complied with Order No. 00-001 with the exceptions shown in the following tables. The Discharger responded appropriately to each incident.

**Table C.1 – Effluent Violations**

Date	Violation	Effluent Limit Violated	Reported Value and Cause (if known)	Staff Enforcement Action
11/04/2000	Settleable Solids Daily Maximum	3.0 mL/L	4.3 mL/L; caused by equipment failure	Mandatory Minimum Complaint R3-2001-0064 issued 4/6/2001
11/5/2001	Settleable Solids Daily Maximum	3.0 mL/L	9.0 mL/L	Mandatory Minimum Complaint R3-2004-0007 issued 3/10/2004
11/11/2001	Settleable Solids 7-day average	1.5 mL/L	1.6 mL/L; caused by equipment failure	None recommended

**Table C.2 – Sanitary Sewer Overflows**

Date	Volume (gallons)	Discharge to Waterbody (Y/N)	Reported Cause	Staff Enforcement Action
11/13/2001	1,600	N	Power outage and alarm failure	Verbal
12/24/2001	4,500	Y	Root blockage	Verbal
01/03/2002	400	N	Alarm failure	Verbal
04/11/2002	5,000	N	Grease blockage	None recommended
05/19/2003	850	Y	Grease blockage	None recommended
07/10/2004	100	Y	Grease blockage	None recommended
01/10/2005	300	Y	Severe rainfall	None recommended

Central Coast Water Board records also indicate several minor reporting violations, resulting in staff's informal verbal or written enforcement actions. The Discharger responded appropriately by submitting the information or modifying monitoring practices to include the data in future reports.

In June, 2002, U.S. EPA conducted a compliance evaluation of the Discharger's sanitary sewer collection system, and determined that from December 6, 1997 to April 11, 2002 (4-1/3 years), the

Discharger suffered 30 sanitary sewer overflows ranging in volume from 10 to 46,000 gallons. The overflows were caused by heavy rain, blockages due to grease or roots, force main breaks, equipment failure, operator error, and vandalism.

On September 30, 2002, U.S. EPA issued Docket No. CWA-402-9-02-64, *Findings of Violation and Order for Compliance*, which required the Discharger to take remedial actions to reduce the number of sewage spills from its collection system. The U.S. EPA Administrative Order set forth a series of actions and plans for preparation and implementation according to required timelines, including the following:

- Immediate reduction of collection system spills
- Sanitary sewer overflow response planning
- Compliance with State and County emergency notification procedures
- Collection system capacity assessment
- Collection system assurance planning
- Collection system condition assessment and rehabilitation planning
- Pump station and force main maintenance, repair, and upgrades
- Fats, oils, and grease blockage control planning
- Plan review and approval by U.S. EPA
- Quarterly and annual reporting to U.S. EPA and the Central Coast Water Board

The most recent history of sanitary sewer overflows (shown in Table C.2 above) shows that seven overflows have occurred from November 13, 2001 through July 12, 2005 (3 years, 8 months), ranging in volume from 100 to 5,000 gallons. Though this range of dates overlaps with that of U.S. EPA's evaluation period, the Discharger's recent spill history compares favorably with U.S. EPA's findings in that spill frequency and volume appear reduced.

The U.S. EPA Order remains in effect until terminated by the Director of the Water Division for U.S. EPA, Region 9. Termination will not occur before December 31, 2005, unless the Director determines otherwise. Central Coast Water Board records do not indicate that the Discharger has failed to comply with the U.S. EPA Order. The Wastewater Collection System Management Plan required by this Order should facilitate the continuation and further development of the above actions and plans to assure the continued improvement of the Discharger's collection system.

- D. **Planned Changes** -- The Discharger proposes no planned changes to the facility during the next Order term that may impact the development of this Order.

### III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in the proposed Order are based on the requirements and authorities described in this section.

#### A. Legal Authorities

This Order is issued pursuant to section 402 of the Federal Clean Water Act (CWA) and implementing regulations adopted by the U.S. Environmental Protection Agency (U.S. EPA) and Chapter 5.5, Division 7 of the California Water Code (CWC). It shall serve as a NPDES permit for point source discharges from this facility to surface waters. This Order also serves as Waste Discharge Requirements (WDRs) pursuant to Article 4, Chapter 4 of the CWC for discharges that are not subject to regulation under CWA section 402.

**B. California Environmental Quality Act (CEQA)**

This action to adopt an NPDES permit is exempt from the provisions of the California Environmental Quality Act (Public Resources Code Section 21100, et seq.) in accordance with Section 13389 of the CWC.

**C. State and Federal Regulations, Policies, and Plans**

- 1. Water Quality Control Plans.** In 1994, the Central Coast Water Board adopted a Water Quality Control Plan for the Central Coast Region (hereinafter Basin Plan) that designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. In addition, State Water Resources Control Board (State Water Board) Resolution No. 88-63 requires that, with certain exceptions, the Central Coast Water Board assign the municipal and domestic supply use to water bodies that do not have beneficial uses listed in the Basin Plan.

The State Water Board revised the Water Quality Control Plan, Ocean Waters of California (Ocean Plan) on December 3, 2001, and updates it periodically. The Ocean Plan contains water quality objectives and other requirements governing discharges to the Pacific Ocean.

Beneficial uses applicable to the Pacific Ocean are as follows:

Discharge Point	Receiving Water Name	Beneficial Use(s)
001	Pacific Ocean	<u>Existing:</u> Water contact recreation (REC-1); non-contact water recreation (REC-2); industrial service supply (IND); navigation (NAV); marine habitat (MAR); shellfish harvesting (SHELL); commercial and sport fishing (COMM); rare, threatened, or endangered species (RARE); wildlife habitat (WILD); migration of aquatic organisms (MIGR); spawning, reproduction, and/or early development (SPWN).

- 2. Antidegradation Policy.** Section 131.12 of 40 CFR requires that State water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16, which incorporates the requirements of the federal antidegradation policy. Resolution No. 68-16 requires that existing water quality is maintained unless degradation is justified based on specific findings. The permitted discharge is consistent with the antidegradation provision of 40 CFR §131.12 and State Water Board Resolution No. 68-16.
- 3. Anti-Backsliding Requirements.** Sections 402(o)(2) and 303(d)(4) of the CWA and 40 CFR §122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require that effluent limitations in a reissued permit must be as stringent as those in the previous permit, with some exceptions in which limitations may be relaxed. All effluent limitations in the Order are at least as stringent as the effluent limitations in the previous Order.

4. **Monitoring and Reporting Requirements.** Section 122.48 of 40 CFR requires that all NPDES permits specify requirements for recording and reporting monitoring results. Sections 13267 and 13383 of the CWC authorize the Regional Water Boards to require technical and monitoring reports. The Monitoring and Reporting Program (MRP) establishes monitoring and reporting requirements to implement federal and State requirements. This MRP is provided in Attachment E.

#### D. Other Plans, Policies and Regulations

1. **Stormwater Management.** Storm water runoff due to rainfall which falls upon the wastewater treatment facility and which may be exposed to on-site pollutant sources is routed to the facility's headworks for treatment. This permit regulates all storm water discharges at this facility and complies with Federal regulations for storm water management [Title 40, Code of Federal Regulations (CFR), Parts 122, 123, and 124], and therefore this facility is exempt from coverage under the State's Water Quality Order No. 97-03-DWQ, *NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities*.
2. **Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (General Permit).** The General Permit, Order No. 2006-0003-DWQ, adopted May 2, 2006, applies to publicly owned sanitary sewer systems (collection systems) that are one mile or greater in length. The General Permit requires collection system entities to develop a Sanitary Sewer Management Plan (SSMP). SSMPs are required to include goals; an organizational description; legal authority; an operations and maintenance program; design and performance provisions; an overflow emergency response plan; a fats, oils, and greases (FOG) control program; a systems evaluations and capacity assurance program; monitoring, measures, and program modifications; and an SSMP Program audit. Additionally, the General Permit requires the collection system entities to report sanitary sewer overflows (SSOs). Collection system entities are required to report SSOs that are greater than 1,000 gallons. Furthermore, some entities must also report SSOs less than 1,000 gallons discharging to surface waters or storm drains or that threaten public health. Reporting provisions are set forth in the General Permit. Reporting shall occur through the Statewide Online SSO database. Reporting times vary depending on discharge amount and destination.

Carpinteria Sanitary District filed a complete application package to the State Water Board dated July 11, 2006, and obtained full enrollment status on August 18, 2006 (Waste Discharge Identification No. 3 SSO 10245).

#### IV. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source discharges to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations and other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 CFR §122.44(a) requires that permits include applicable technology-based limitations and standards; and 40 CFR §122.44(d) requires that permits include water quality-based effluent limitations to attain and maintain applicable numeric and narrative water quality criteria to protect the beneficial uses of the receiving water. Where numeric water quality objectives have not been established, three options exist to protect water quality: 1) 40 CFR §122.44(d) specifies that WQBELs may be established using U.S. EPA criteria guidance under CWA section 304(a); 2) proposed State criteria or a State policy interpreting narrative criteria supplemented with other relevant information may be used; or 3) an indicator parameter may be established.

**A. Discharge Prohibitions** – To effectively regulate this waste discharge, including protecting public and environmental health and facilitating compliance monitoring, it is necessary to know the discharge location and that the discharge is properly treated. Order Section III specifies the authorized discharge location, and prohibits the discharge of untreated wastes to surface waters or conveyances thereto.

**B. Technology-Based Effluent Limitations**

1. **Scope and Authority** - Regulations promulgated in 40 CFR §125.3(a)(1) require technology-based effluent limitations for municipal dischargers to be placed in NPDES permits based on Secondary Treatment Standards or Equivalent to Secondary Treatment Standards.

The Federal Water Pollution Control Act Amendments of 1972 (PL 92-500) established the minimum performance requirements for POTWs [defined in Section 304(d)(1)]. Section 301(b)(1)(B) of that Act requires that such treatment works must, as a minimum, meet effluent limitations based on secondary treatment as defined by the U.S. EPA Administrator.

Based on this statutory requirement, U.S. EPA developed secondary treatment regulations, which are specified in 40 CFR 133. These technology-based regulations apply to all municipal wastewater treatment plants and identify the minimum level of effluent quality attainable by secondary treatment in terms of biochemical oxygen demand (BOD<sub>5</sub>), total suspended solids (TSS), and pH.

2. **Applicable Technology-Based Effluent Limitations** – Staff applied effluent BOD<sub>5</sub>, TSS concentrations and removal efficiencies directly from 40 CFR 133.102. While pH limitations are also provided in 40 CFR, staff used water quality based effluent limits from the Ocean Plan. Please see Fact Sheet Section C.4 for more detail regarding pH effluent limits.

Where applicable, the above technology-based limits are also expressed in terms of mass loading, with units of pounds/day. 40 CFR 122.45(f)(2) provides that, "Pollutants limited in terms of mass additionally may be limited in terms of other units of measurement, and the permit shall require the Discharger to comply with both limitations."

Ocean Plan Section III.C.3.j states that, "Discharge requirements shall also specify effluent limitations in terms of mass emission rate limits utilizing [Ocean Plan Equation No. 3]."

The preceding Permit also contained mass loading limits, so including them in the renewed Permit is consistent with anti-backsliding requirements.

Staff calculated mass loading limits using the following equation (based on Equation No. 3 of the 2001 Ocean Plan):

$$\text{mass loading in lbs/day} = 8.34 \times C_e \times Q$$

where:

$C_e$  = the effluent concentration limit, in mg/L;

$Q$  = the flow rate observed over the concentration limit's period (e.g., daily, weekly/7-day, monthly/30-day), in millions of gallons per day (MGD), and;

The conversion factor of 8.34 has units of [(lbs/Million Gallons) / (mg/L)].

For example, the effluent BOD<sub>5</sub> 30-day average concentration limit is 30 mg/L (C<sub>e</sub>). Using the permitted flow rate of 2.5 MGD and the conversion factor 8.34:

$$\text{BOD}_5 \text{ effluent mass loading} = 8.34 \times 30 \times 2.5$$

$$\text{BOD}_5 \text{ effluent mass loading} = 625.50 \text{ lbs/day}$$

Because the significant figures are limited to two by the concentration and flow rate, the calculated mass loading is rounded to 630 lbs/day. Staff followed this rounding convention for all calculated effluent limits in the Permit.

Staff established the maximum daily effluent limits for BOD<sub>5</sub> and TSS based on Best Professional Judgement in previous permits. In accordance with anti-backsliding provisions, staff recommends maintaining these limits.

**Summary of Technology-based Effluent Limitations  
 Discharge Point 001**

Parameter	Units	Effluent Limitations		
		30-day Average	7-day Average	Maximum Daily
Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	mg/L	30	45	90
	% removal	Not less than 85%	N/A	N/A
	lbs/day	630	940	1,900
Total Suspended Solids (TSS)	mg/L	30	45	90
	% removal	Not less than 85%	N/A	N/A
	lbs/day	630	940	1,900

**C. Water Quality-Based Effluent Limitations (WQBELs)**

**1. Scope and Authority**

The Ocean Plan is applicable, in its entirety, to point source discharges to the ocean (2001 Ocean Plan, *Introduction*, C.1). Ocean Plan Section III.C.3 establishes that water quality-based effluent limitations (WQBELs) for water quality objectives listed in Ocean Plan Table B, with the exception of acute toxicity and radioactivity, shall be determined using Ocean Plan Equation No. 1. Staff discusses the use of Equation No. 1 in the next section of this Fact Sheet.

As specified in 40 CFR §122.44(d)(1)(i), permits are required to include WQBELs for pollutants (including toxicity) that are or may be discharged at levels that cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. The process for determining reasonable potential and calculating WQBELs when necessary is intended to protect the designated uses of the receiving water as specified in the Basin Plan, and achieve applicable water quality objectives and criteria that are contained in other state plans and policies. Staff may conduct statistical or non-statistical reasonable potential analyses to determine the need for WQBELs.

**2. Applicable Beneficial Uses and Water Quality Criteria and Objectives**

Applicable beneficial uses are discussed on Permit Section II, Finding H, or Fact Sheet Section III.C.1.



Ocean Plan and Basin Plan numeric and narrative water quality criteria and objectives apply to the discharge. Narrative criteria are transcribed in the permit and include footnotes to indicate their source.

The discharge must meet Ocean Plan requirements outside a "zone of initial dilution" (dilution zone) around the outfall diffuser. The Ocean Plan defines the dilution zone as the region in which the rapid, initial mixing occurs.

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 93:1 to the discharge to determine effluent limitations derived from Ocean Plan water quality objectives.

### 3. Determining the Need for WQBELs

During the July 14, 2000 Central Coast Water Board public hearing for the adoption of Order No. 00-001, the Board rejected the use of limited data sets to statistically determine reasonable potential for municipal dischargers. The Central Coast Water Board found that the pollutant loading to publicly owned, domestic wastewater treatment facilities varies greatly, and potential always exists for pollutants to be discharged at a level that may cause, have reasonable potential to cause, or contribute to an excursion above effluent limitations (and therefore above state water quality objectives/standards). Intermittent disposal of household pesticides, detergents, and other toxics may not be captured by infrequent monitoring (and thus not be accounted for in the statistical reasonable potential analysis), but may cause, have reasonable potential to cause, or contribute to an excursion above effluent limitations. The Central Coast Water Board retained the entirety of the effluent limits based on Ocean Plan Table B, as contained in Order No. 94-95.

This rationale and approach was documented in staff's report to the Central Coast Water Board on February 1, 2002 (Agenda Item No. 22).

The Discharger continues to collect, treat, and dispose of domestic/municipal wastewater. Based on the inherent variability of such wastewater, as discussed above, staff continues to recommend findings of reasonable potential and the application of effluent limits according to the entirety of Ocean Plan Table B.

### 4. WQBEL Calculations

Ocean Plan Section III.B, Table A establishes POTW effluent limitations for Grease and Oil, Suspended Solids, Settleable Solids, Turbidity, and pH. Staff did not use the Ocean Plan Suspended Solids limit because it is not as stringent as the technology-based limits in 40 CFR 133.102 or Order No. 00-001 (the preceding Permit). Staff applied the Ocean Plan's pH limit because, although equal to 40 CFR in range (6 to 9), it lacks the conditional applicability of 40 CFR and is therefore the more stringent standard. The Ocean Plan's effluent pH limit is also equal to the preceding Order, so applying this standard is consistent with anti-backsliding requirements.

Ocean Plan Section III.C.3 establishes that water quality-based concentration effluent limitations (WQBELs) for water quality objectives listed in Ocean Plan Table B, with the exception of acute toxicity and radioactivity, shall be determined using Ocean Plan Equation No. 1, as follows:

$$C_e = C_o + Dm(C_o - C_s)$$

where:

- Ce = the effluent concentration limit, in ug/L
- Co = the concentration (water quality objective) to be met at the completion of initial dilution, in ug/L
- Cs = background seawater concentration (see table below), in ug/L
- Dm = minimum probable initial dilution expressed as parts seawater per part wastewater. The minimum probable initial dilution applying to the discharger 93:1, therefore Dm = 93.

**BACKGROUND SEAWATER CONCENTRATIONS (Cs)**

Waste Constituent	Cs (ug/L)
Arsenic	3.
Copper	2.
Mercury	0.0005
Silver	0.16
Zinc	8.

For all other Table B parameters, Cs = 0.

Where applicable, water quality-based limits are also expressed in terms of mass loading, with units of pounds/day. 40 CFR 122.45(f)(2) provides that, "Pollutants limited in terms of mass additionally may be limited in terms of other units of measurement, and the permit shall require the Discharger to comply with both limitations."

Ocean Plan Section III.C.3.j states that, "Discharge requirements shall also specify effluent limitations in terms of mass emission rate limits utilizing [Ocean Plan Equation No. 3]." Staff calculated maximum allowable mass-based effluent limits, where the mass loading in pounds per day = 8.34 x Ce x Q.

where:

- Ce = the effluent concentration limit, in mg/L;
- Q = the flow rate observed over the concentration limit's period (e.g., daily, weekly/7-day, monthly/30-day), in millions of gallons per day (MGD), and;

The conversion factor of 8.34 has units of [(lbs/Million Gallons) / (mg/L)].

**Example Calculation of WQBEL Concentration (Using Arsenic as an example):**

From Ocean Plan Table B:

- Co (the daily maximum water quality objective for Arsenic) = 32 ug/L;
- Cs (according to the table of background seawater concentrations for Arsenic) = 3 ug/L, and;
- Dm (the minimum probable initial dilution) = 93.

Therefore:

The calculated daily maximum WQBEL for Arsenic (Ce) = 32 + 93(32 - 3), or Ce = 2,729 ug/L, or 2.7 mg/L using two significant figures.

**Example Calculation of WQBEL Maximum Allowable Mass Loading (Using the Arsenic effluent limits calculated above as an example):**

Q (the maximum permitted flow) = 2.5 million gallons per day.

Ce = 2.729 mg/L

Therefore:

The mass loading limit for Arsenic =  $8.34 \times 2.729 \times 2.5 = \underline{57 \text{ lbs/day}}$ , using two significant figures.

**Summary of Water Quality-Based Effluent Limitations**  
**Discharge Point 001**

**Effluent Limitations Derived from Ocean Plan Table A**

Parameter	Units	Effluent Limitations		
		30-day Average	7-day Average	Maximum Daily
pH	pH units	6 to 9 at all times		
Grease & Oil	mg/L	25	40	75
	lbs/day	520	830	1,600
Settleable Solids	mL/L	1.0	1.5	3.0
Turbidity	NTU	75	100	225

**Effluent Limitations for the Protection of  
 Marine Aquatic Life – Derived from Ocean Plan Table B**

	Units of Measurement	6-Month Median	Daily Maximum	Instantaneous Maximum
Arsenic	ug/L	470	2,700	7,200
	lbs/Day	9.9	57	150
Cadmium	ug/L	94	380	940
	lbs/Day	2.0	7.8	20
Chromium (Hexavalent)	ug/L	190	750	1,900
	lbs/Day	3.9	16	39
Copper	ug/L	96	940	2,600
	lbs/Day	2.0	20	55
Lead	ug/L	190	750	1,900
	lbs/Day	3.9	16	39
Mercury	ug/L	3.7	15	38
	lbs/Day	0.77	0.31	0.78
Nickel	ug/L	470	1,900	4,700
	lbs/Day	9.8	39	98
Selenium	ug/L	1,400	5,600	14,000
	lbs/Day	29	120	290
Silver	ug/L	51	250	640
	lbs/Day	1.1	5.2	13
Zinc	ug/L	1,100	6,800	18,000
	lbs/Day	24	140	380
Cyanide	ug/L	94	380	940
	lbs/Day	2.0	7.8	20
Total Chlorine Residual	ug/L	190	750	5,600
	lbs/Day	3.9	16	120
Ammonia (expressed as N)	ug/L	56,000	230,000	560,000
	lbs/Day	1,200	4,700	12,000
Acute Toxicity	TUa	----	3.1	----
Chronic Toxicity	TUc	----	94	----
Phenolic Compounds (non-chlorinated)	ug/L	2,800	11,000	28,000
	lbs/Day	59	240	590

**Effluent Limitations for the Protection of  
 Marine Aquatic Life – Derived from Ocean Plan Table B**

	<b>Units of Measurement</b>	<b>6-Month Median</b>	<b>Daily Maximum</b>	<b>Instantaneous Maximum</b>
Chlorinated Phenolics	ug/L	94	380	940
	lbs/Day	2.0	7.8	20
Endosulfan	ug/L	0.85	1.7	2.5
	lbs/Day	0.018	0.035	0.0530
Endrin	ug/L	0.19	0.38	0.56
	lbs/Day	0.0039	0.0078	0.012
HCH	ug/L	0.38	0.75	1.1
	lbs/Day	0.0078	0.016	0.024
Radioactivity	Not to exceed limits specified in Title 17, Division 1, Chapter 5, Subchapter 4, Group 3, Article 3, Section 30253 of the California Code of Regulations. Reference to Section 30253 is prospective, including future changes to any incorporated provisions of federal law, as the changes take effect.			

**Effluent Limitations for the Protection Of Human Health –  
 Non-Carcinogens – Derived from Ocean Plan Table B**

<b>Chemical</b>	<b>Units of Measurement</b>	<b>30-day average</b>
Acrolein	ug/L	$2.1 \times 10^4$
	lbs/Day	430
Antimony	ug/L	$1.1 \times 10^5$
	lbs/Day	2,400
Bis(2-chloroethoxy) methane	ug/L	410
	lbs/Day	8.6
Bis(2-chloroisopropyl) ether	ug/L	$1.1 \times 10^5$
	lbs/Day	2,400
Chlorobenzene	ug/L	$5.4 \times 10^4$
	lbs/Day	1,100
Chromium (III)	ug/L	$1.8 \times 10^7$
	lbs/Day	370,000
di-n-butyl phthalate	ug/L	$3.3 \times 10^5$
	lbs/Day	6,900
Dichlorobenzenes	ug/L	$4.8 \times 10^5$
	lbs/Day	10,000
Diethyl phthalate	ug/L	$3.1 \times 10^6$
	lbs/Day	65,000
Dimethyl phthalate	ug/L	$7.7 \times 10^7$
	lbs/Day	$1.6 \times 10^6$
4,6-dinitro-2-methylphenol	ug/L	$2.1 \times 10^4$
	lbs/Day	430

**Effluent Limitations for the Protection Of Human Health –  
 Non-Carcinogens – Derived from Ocean Plan Table B**

Chemical	Units of Measurement	30-day average
2,4-dinitrophenol	ug/L	380
	lbs/Day	7.8
Ethylbenzene	ug/L	$3.8 \times 10^5$
	lbs/Day	$8.0 \times 10^3$
Fluoranthene	ug/L	$1.4 \times 10^3$
	lbs/Day	29
Hexachlorocyclopentadiene	ug/L	$5.4 \times 10^3$
	lbs/Day	110
Nitrobenzene	ug/L	460
	lbs/Day	9.6
Thallium	ug/L	190
	lbs/Day	3.9
Toluene	ug/L	$8.0 \times 10^6$
	lbs/Day	$1.7 \times 10^5$
Tributyltin	ug/L	0.13
	lbs/Day	0.0027
1,1,1-trichloroethane	ug/L	$5.1 \times 10^7$
	lbs/Day	$1.1 \times 10^6$

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean  
 Plan Table B**

Chemical	Units of Measurement	30-day average
Acrylonitrile	ug/L	9.4
	lbs/Day	0.20
Aldrin	ug/L	$2.1 \times 10^{-3}$
	lbs/Day	$4.3 \times 10^{-5}$
Benzene	ug/L	550
	lbs/Day	12
Benzidine	ug/L	$6.5 \times 10^{-3}$
	lbs/Day	$1.4 \times 10^{-4}$
Beryllium	ug/L	3.1
	lbs/Day	0.065
Bis(2-chloroethyl) ether	ug/L	4.2
	lbs/Day	0.088
Bis(2-ethylhexyl) phthalate	ug/L	330
	lbs/Day	6.9
Carbon tetrachloride	ug/L	85
	lbs/Day	1.8
Chlordane	ug/L	$2.2 \times 10^{-3}$
	lbs/Day	$4.5 \times 10^{-5}$
Chlorodibromomethane	ug/L	810
	lbs/Day	17

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean  
 Plan Table B**

<b>Chemical</b>	<b>Units of Measurement</b>	<b>30-day average</b>
Chloroform	ug/L	1.2 x 10 <sup>4</sup>
	lbs/Day	260
DDT	ug/L	0.016
	lbs/Day	3.3 x 10 <sup>-4</sup>
1,4-dichlorobenzene	ug/L	1.7 x 10 <sup>3</sup>
	lbs/Day	35
3,3'-dichlorobenzidine	ug/L	0.76
	lbs/Day	0.016
1,2-dichloroethane	ug/L	2.6 x 10 <sup>3</sup>
	lbs/Day	55
1,1-dichloroethylene	ug/L	85
	lbs/Day	1.8
Dichlorobromomethane	ug/L	580
	lbs/Day	12
Dichloromethane	ug/L	4.2 x 10 <sup>4</sup>
	lbs/Day	880
1,3-dichloropropene	ug/L	840
	lbs/Day	17
Dieldrin	ug/L	3.8 x 10 <sup>-3</sup>
	lbs/Day	7.8 x 10 <sup>-5</sup>
2,4-dinitrotoluene	ug/L	240
	lbs/Day	5.1
1,2-diphenylhydrazine	ug/L	15
	lbs/Day	0.31
Halomethanes	ug/L	1.2 x 10 <sup>4</sup>
	lbs/Day	260
Heptachlor	ug/L	4.7 x 10 <sup>-3</sup>
	lbs/Day	9.8 x 10 <sup>-5</sup>
Heptachlor epoxide	ug/L	1.9 x 10 <sup>-3</sup>
	lbs/Day	3.9 x 10 <sup>-5</sup>
Hexachlorobenzene	ug/L	0.020
	lbs/Day	4.1 x 10 <sup>-4</sup>
Hexachlorobutadiene	ug/L	1.3 x 10 <sup>3</sup>
	lbs/Day	27
Hexachloroethane	ug/L	240
	lbs/Day	4.9
Isophorone	ug/L	6.9 x 10 <sup>4</sup>
	lbs/Day	1.4 x 10 <sup>3</sup>
N-nitrosodimethylamine	ug/L	690
	lbs/Day	14
N-nitrosodi-N-propylamine	ug/L	36
	lbs/Day	0.74
N-nitrosodiphenylamine	ug/L	240
	lbs/Day	4.9

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean  
 Plan Table B**

Chemical	Units of Measurement	30-day average
PAHs	ug/L	0.83
	lbs/Day	0.017
PCBs	ug/L	$1.8 \times 10^{-3}$
	lbs/Day	$3.7 \times 10^{-5}$
TCDD equivalents	ug/L	$3.7 \times 10^{-7}$
	lbs/Day	$7.6 \times 10^{-9}$
1,1,2,2-tetrachloroethane	ug/L	220
	lbs/Day	4.5
Tetrachloroethylene	ug/L	190
	lbs/Day	3.9
Toxaphene	ug/L	0.020
	lbs/Day	$4.1 \times 10^{-4}$
Trichloroethylene	ug/L	$2.5 \times 10^3$
	lbs/Day	53
1,1,2-trichloroethane	ug/L	880
	lbs/Day	18
2,4,6-trichlorophenol	ug/L	27
	lbs/Day	0.57
Vinyl chloride	ug/L	$3.4 \times 10^3$
	lbs/Day	70

**5. Whole Effluent Toxicity (WET)**

Ocean Plan Table B includes daily maximum water quality objectives for acute and chronic toxicity.

**Acute Toxicity**

According to Ocean Plan Section III.C.3.b, the mixing zone for the acute toxicity objective shall be ten percent (10%) of the distance from the edge of the outfall structure to the edge of the chronic mixing zone (zone of initial dilution). There is no vertical limitation on this zone. The effluent limitation for the acute toxicity objective listed in Ocean Plan Table B shall be determined through the use of the following equation:

$$C_e = C_a + (0.1) D_m (C_a)$$

where:

$C_a$  = the concentration (water quality objective) to be met at the edge of the acute mixing zone, and;

$D_m$  = minimum probable initial dilution expressed as parts seawater per part wastewater (This equation applies only when  $D_m > 24$ ).

so,

$C_a = 0.3$  acute toxicity units, or TU<sub>a</sub>, and;



$$D_m = 93$$

Therefore,

$$C_e = 0.3 + [0.1 \times 93 \times 0.3]$$

$$C_e = 3.1 \text{ TUa (this value is also shown in the above tables in Fact Sheet Section C.4)}$$

### Chronic Toxicity

Ocean Plan Section III.C.3.c(4) states that, "Dischargers shall conduct chronic toxicity testing if the minimum initial dilution of the effluent falls below 100:1 at the edge of the mixing zone." The Discharger's minimum initial dilution is 93:1.

The daily maximum chronic toxicity effluent limit is based on the Ocean Plan Table B chronic toxicity water quality objective. The effluent limit is calculated as discussed above in Fact Sheet Section C.4.

### Toxicity Identification / Reduction Evaluations

Ocean Plan Section III.C.9 states:

If a discharge consistently exceeds an effluent limitation based on a toxicity objective in Table B, a toxicity reduction evaluation (TRE) is required. The TRE shall include all reasonable steps to identify the source of toxicity. Once the source(s) of toxicity is identified, the discharger shall take all reasonable steps necessary to reduce toxicity to the required level. The following shall be incorporated into waste discharge requirements: (1) a requirement to conduct a TRE if the discharge consistently exceeds its toxicity effluent limitation, and (2) a provision requiring a discharger to take all reasonable steps to reduce toxicity once the source of toxicity is identified.

Based on the above, where toxicity monitoring shows a violation of the permit's toxicity limitations, the Discharger shall increase the frequency of toxicity testing to once per week and submit the data within 15 days of the conclusion of each weekly test to the Central Coast Water Board's Executive Officer. The Executive Officer will determine whether to initiate enforcement action or whether the Discharger will be required to implement a Toxicity Reduction Evaluation (TRE) requirements, which include conducting a Toxicity Identification Evaluation (TIE).

The basis of the TRE shall be EPA's *Methods for Aquatic Toxicity Identification Evaluations: Phase I, Toxicity Characterization Procedures*, 2nd Edition, 1991b (EPA 600-6-91-003), *Methods for Aquatic Toxicity Identification Evaluations: Phase II, Toxicity Identification Procedures for Samples Exhibiting Acute and Chronic Toxicity*, 1993a (EPA 600-R-92-080), *Methods for Aquatic Toxicity Identification Evaluations: Phase III, Toxicity Confirmation Procedures for Samples Exhibiting Acute and Chronic Toxicity*, 1993b (EPA 600-R-92-081), and *Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants* (EPA 833-B-99-002), August 1999, or revised editions.

## 6. Total Coliform Effluent Limitations

The seven-day median effluent total coliform limitation (23/100 mL) and the maximum total coliform limitation (2,300/100 mL) were established in Order No. 94-95 based on the California

Department of Health Services' *Uniform Guidelines for Wastewater Disinfection*. This Order maintains these limits.

**D. Final Effluent Limitations**

**Summary of Final Effluent Limitations  
 Discharge Point 001**

**Effluent Limitations Derived from Ocean Plan Table A**

Parameter	Units	30-day Average	7-day Average	Maximum Daily	Basis
Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	mg/L	30	45	90	40 CFR 133.102, BPJ and anti-backsliding for max. daily
	% removal	Not less than 85%	N/A	N/A	40 CFR 133.102
	lbs/day	630	940	1,900	40 CFR 122.45(f)(2)
Total Suspended Solids (TSS)	mg/L	30	45	90	40 CFR 133.102, BPJ and anti-backsliding for max. daily
	% removal	Not less than 85%	N/A	N/A	40 CFR 133.102
	lbs/day	630	940	1,900	40 CFR 122.45(f)(2)
pH	pH units	N/A	N/A	N/A	Ocean Plan Table A
Grease & Oil	mg/L	25	40	75	Ocean Plan Table A
	lbs/day	520	830	1,600	40 CFR 122.45(f)(2)
Settleable Solids	mL/L	1.0	1.5	3.0	Ocean Plan Table A
Turbidity	NTU	75	100	225	Ocean Plan Table A

**Effluent Limitations for the Protection of  
 Marine Aquatic Life – Derived from Ocean Plan Table B**

Constituent	Units of Measurement	6-Month Median	Daily Maximum	Instantaneous Maximum	Basis
Arsenic	ug/L	470	2,700	7,200	Ocean Plan Table B
	lbs/Day	9.9	57	150	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Cadmium	ug/L	94	380	940	Ocean Plan Table B
	lbs/Day	2.0	7.8	20	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chromium (Hexavalent)	ug/L	190	750	1,900	Ocean Plan Table B
	lbs/Day	3.9	16	39	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Copper	ug/L	96	940	2,600	Ocean Plan Table B
	lbs/Day	2.0	20	55	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection of  
 Marine Aquatic Life – Derived from Ocean Plan Table B**

Constituent	Units of Measurement	6-Month Median	Daily Maximum	Instantaneous Maximum	Basis
Lead	ug/L	190	750	1,900	Ocean Plan Table B
	lbs/Day	3.9	16	39	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Mercury	ug/L	3.7	15	38	Ocean Plan Table B
	lbs/Day	0.77	0.31	0.78	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Nickel	ug/L	470	1,900	4,700	Ocean Plan Table B
	lbs/Day	9.8	39	98	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Selenium	ug/L	1,400	5,600	14,000	Ocean Plan Table B
	lbs/Day	29	120	290	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Silver	ug/L	51	250	640	Ocean Plan Table B
	lbs/Day	1.1	5.2	13	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Zinc	ug/L	1,100	6,800	18,000	Ocean Plan Table B
	lbs/Day	24	140	380	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Cyanide	ug/L	94	380	940	Ocean Plan Table B
	lbs/Day	2.0	7.8	20	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Total Chlorine Residual	ug/L	190	750	5,600	Ocean Plan Table B
	lbs/Day	3.9	16	120	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Ammonia (expressed as N)	ug/L	56,000	230,000	560,000	Ocean Plan Table B
	lbs/Day	1,200	4,700	12,000	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Acute Toxicity	TUa	-----	3.1	-----	Ocean Plan Table B
Chronic Toxicity	TUc	-----	94	-----	Ocean Plan Table B
Phenolic Compounds (non-chlorinated)	ug/L	2,800	11,000	28,000	Ocean Plan Table B
	lbs/Day	59	240	590	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chlorinated Phenolics	ug/L	94	380	940	Ocean Plan Table B
	lbs/Day	2.0	7.8	20	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection of  
 Marine Aquatic Life – Derived from Ocean Plan Table B**

Constituent	Units of Measurement	6-Month Median	Daily Maximum	Instantaneous Maximum	Basis
Endosulfan	ug/L	0.85	1.7	2.5	Ocean Plan Table B
	lbs/Day	0.018	0.035	0.0530	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Endrin	ug/L	0.19	0.38	0.56	Ocean Plan Table B
	lbs/Day	0.0039	0.0078	0.012	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
HCH	ug/L	0.38	0.75	1.1	Ocean Plan Table B
	lbs/Day	0.0078	0.016	0.024	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Radioactivity	Not to exceed limits specified in Title 17, Division 1, Chapter 5, Subchapter 4, Group 3, Article 3, Section 30253, of the California Code of Regulations. Reference to Section 30253 is prospective, including future changes to any incorporated provisions of federal law, as the changes take effect.				Ocean Plan Table B

**Effluent Limitations for the Protection Of Human Health –  
 Non-Carcinogens – Derived from Ocean Plan Table B**

Chemical	Units of Measurement	30-day average	Basis
Acrolein	ug/L	2.1 x 10 <sup>4</sup>	Ocean Plan Table B
	lbs/Day	430	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Antimony	ug/L	1.1 x 10 <sup>5</sup>	Ocean Plan Table B
	lbs/Day	2,400	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Bis(2-chloroethoxy) methane	ug/L	410	Ocean Plan Table B
	lbs/Day	8.6	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Bis(2-chloroisopropyl) ether	ug/L	1.1 x 10 <sup>5</sup>	Ocean Plan Table B
	lbs/Day	2,400	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chlorobenzene	ug/L	5.4 x 10 <sup>4</sup>	Ocean Plan Table B
	lbs/Day	1,100	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chromium (III)	ug/L	1.8 x 10 <sup>7</sup>	Ocean Plan Table B
	lbs/Day	370,000	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
di-n-butyl phthalate	ug/L	3.3 x 10 <sup>5</sup>	Ocean Plan Table B
	lbs/Day	6,900	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection Of Human Health --  
 Non-Carcinogens – Derived from Ocean Plan Table B**

<b>Chemical</b>	<b>Units of Measurement</b>	<b>30-day average</b>	<b>Basis</b>
Dichlorobenzenes	ug/L	$4.8 \times 10^5$	Ocean Plan Table B
	lbs/Day	10,000	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Diethyl phthalate	ug/L	$3.1 \times 10^6$	Ocean Plan Table B
	lbs/Day	65,000	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Dimethyl phthalate	ug/L	$7.7 \times 10^7$	Ocean Plan Table B
	lbs/Day	$1.6 \times 10^6$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
4,6-dinitro-2-methylphenol	ug/L	$2.1 \times 10^4$	Ocean Plan Table B
	lbs/Day	430	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
2,4-dinitrophenol	ug/L	380	Ocean Plan Table B
	lbs/Day	7.8	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Ethylbenzene	ug/L	$3.8 \times 10^5$	Ocean Plan Table B
	lbs/Day	$8.0 \times 10^3$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Fluoranthene	ug/L	$1.4 \times 10^3$	Ocean Plan Table B
	lbs/Day	29	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Hexachlorocyclopentadiene	ug/L	$5.4 \times 10^3$	Ocean Plan Table B
	lbs/Day	110	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Nitrobenzene	ug/L	460	Ocean Plan Table B
	lbs/Day	9.6	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Thallium	ug/L	190	Ocean Plan Table B
	lbs/Day	3.9	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Toluene	ug/L	$8.0 \times 10^6$	Ocean Plan Table B
	lbs/Day	$1.7 \times 10^5$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Tributyltin	ug/L	0.13	Ocean Plan Table B
	lbs/Day	0.0027	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,1,1-trichloroethane	ug/L	$5.1 \times 10^7$	Ocean Plan Table B
	lbs/Day	$1.1 \times 10^6$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean Plan  
 Table B**

<b>Chemical</b>	<b>Units of Measurement</b>	<b>30-day average</b>	<b>Basis</b>
Acrylonitrile	ug/L	9.4	Ocean Plan Table B
	lbs/Day	0.20	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Aldrin	ug/L	$2.1 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$4.3 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Benzene	ug/L	550	Ocean Plan Table B
	lbs/Day	12	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Benzidine	ug/L	$6.5 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$1.4 \times 10^{-4}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Beryllium	ug/L	3.1	Ocean Plan Table B
	lbs/Day	0.065	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Bis(2-chloroethyl) ether	ug/L	4.2	Ocean Plan Table B
	lbs/Day	0.088	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Bis(2-ethylhexyl) phthalate	ug/L	330	Ocean Plan Table B
	lbs/Day	6.9	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Carbon tetrachloride	ug/L	85	Ocean Plan Table B
	lbs/Day	1.8	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chlordane	ug/L	$2.2 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$4.5 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chlorodibromomethane	ug/L	810	Ocean Plan Table B
	lbs/Day	17	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Chloroform	ug/L	$1.2 \times 10^4$	Ocean Plan Table B
	lbs/Day	260	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
DDT	ug/L	0.016	Ocean Plan Table B
	lbs/Day	$3.3 \times 10^{-4}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,4-dichlorobenzene	ug/L	$1.7 \times 10^3$	Ocean Plan Table B
	lbs/Day	35	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
3,3'-dichlorobenzidine	ug/L	0.76	Ocean Plan Table B
	lbs/Day	0.016	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,2-dichloroethane	ug/L	$2.6 \times 10^3$	Ocean Plan Table B
	lbs/Day	55	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean Plan Table B**

Chemical	Units of Measurement	30-day average	Basis
1,1-dichloroethylene	ug/L	85	Ocean Plan Table B
	lbs/Day	1.8	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Dichlorobromomethane	ug/L	580	Ocean Plan Table B
	lbs/Day	12	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Dichloromethane	ug/L	$4.2 \times 10^4$	Ocean Plan Table B
	lbs/Day	880	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,3-dichloropropene	ug/L	840	Ocean Plan Table B
	lbs/Day	17	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Dieldrin	ug/L	$3.8 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$7.8 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
2,4-dinitrotoluene	ug/L	240	Ocean Plan Table B
	lbs/Day	5.1	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,2-diphenylhydrazine	ug/L	15	Ocean Plan Table B
	lbs/Day	0.31	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Halomethanes	ug/L	$1.2 \times 10^4$	Ocean Plan Table B
	lbs/Day	260	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Heptachlor	ug/L	$4.7 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$9.8 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Heptachlor epoxide	ug/L	$1.9 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$3.9 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Hexachlorobenzene	ug/L	0.020	Ocean Plan Table B
	lbs/Day	$4.1 \times 10^{-4}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Hexachlorobutadiene	ug/L	$1.3 \times 10^3$	Ocean Plan Table B
	lbs/Day	27	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Hexachloroethane	ug/L	240	Ocean Plan Table B
	lbs/Day	4.9	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Isophorone	ug/L	$6.9 \times 10^4$	Ocean Plan Table B
	lbs/Day	$1.4 \times 10^3$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

**Effluent Limitations for the Protection Of Human Health – Carcinogens – Derived from Ocean Plan  
 Table B**

Chemical	Units of Measurement	30-day average	Basis
N-nitrosodimethylamine	ug/L	690	Ocean Plan Table B
	lbs/Day	14	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
N-nitrosodi-N-propylamine	ug/L	36	Ocean Plan Table B
	lbs/Day	0.74	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
N-nitrosodiphenylamine	ug/L	240	Ocean Plan Table B
	lbs/Day	4.9	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
PAHs	ug/L	0.83	Ocean Plan Table B
	lbs/Day	0.017	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
PCBs	ug/L	$1.8 \times 10^{-3}$	Ocean Plan Table B
	lbs/Day	$3.7 \times 10^{-5}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
TCDD equivalents	ug/L	$3.7 \times 10^{-7}$	Ocean Plan Table B
	lbs/Day	$7.6 \times 10^{-9}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,1,2,2-tetrachloroethane	ug/L	220	Ocean Plan Table B
	lbs/Day	4.5	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Tetrachloroethylene	ug/L	190	Ocean Plan Table B
	lbs/Day	3.9	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Toxaphene	ug/L	0.020	Ocean Plan Table B
	lbs/Day	$4.1 \times 10^{-4}$	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Trichloroethylene	ug/L	$2.5 \times 10^3$	Ocean Plan Table B
	lbs/Day	53	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
1,1,2-trichloroethane	ug/L	880	Ocean Plan Table B
	lbs/Day	18	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
2,4,6-trichlorophenol	ug/L	27	Ocean Plan Table B
	lbs/Day	0.57	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j
Vinyl chloride	ug/L	$3.4 \times 10^3$	Ocean Plan Table B
	lbs/Day	70	40 CFR 122.45(f)(2), Ocean Plan Section III.C.3.j

The maximum daily acute toxicity limit shown above (3.1 TUa) is higher than the limit in Order No. 00-001 (2.5 TUa) because of the State Water Board's modification of the Ocean Plan in 2001. With regard to anti-backsliding, according to the State Water Board's *Final Functional Equivalent Document – Amendment of the Water Quality Control Plan for Ocean Waters of California (California Ocean Plan), September 1, 2000*, page 27, Comment/Response No. 1.34,



The Clean Water Act's antibacksliding provisions would not apply. The relevant provisions are in Section 402(o)(1) of the Clean Water Act (Act). The section prohibits, with certain exceptions, a permit issuer from replacing existing permit limits with less stringent limits in two types of cases. First, technology-based limits based on best professional judgment cannot be revised to reflect subsequently EPA-promulgated effluent limitation guidelines which are less stringent. Second, the Act prohibits backsliding from water quality-based effluent limitations. In this case, the SWRCB is proposing to replace technology-based acute toxicity limitations based on best professional judgment with, assuming reasonable potential, water quality-based limits. This approach is not subject to antibacksliding restrictions.

Other minor increases and decreases in effluent limits are due to staff's use of two significant figures in calculations, based on the Ocean Plan water quality objectives.

## **V. RATIONALE FOR RECEIVING WATER LIMITATIONS**

### **A. Surface Water**

Staff transcribed receiving water limitations from the Ocean Plan Section II, Basin Plan Chapter III, and California Code of Regulations, Title 17, Sections 7957 and 7958. Staff used footnotes within the permit to indicate the source of each limit.

The California Code of Regulations (CCR), Title 17, Section 7958, establishes the minimum protective bacteriological standards for waters adjacent to public beaches and public water-contact sports areas. The State Water Board amended the Ocean Plan on January 20, 2005 to make the bacteriological standards identical to Title 17, Section 7958. EPA approval of the amendment is pending. However, on December 16, 2004, EPA promulgated coastal recreation standards that include the same requirements. Staff's review of the 2001 Ocean Plan standards and 17 CCR resulted in the addition of the receiving water enterococcus limits. Total and fecal coliform receiving water limitations were found to be practically equivalent between the two sets of standards.

Receiving water quality is a result of many factors, some unrelated to the discharge, such as non point source wastewater. This Order considers these factors and is designed to minimize the influence of the discharge to the receiving water. Compliance with Receiving Water Limitations shall be determined from samples collected at stations representative of the area of potential influence but outside the zone of initial dilution.

## **VI. RATIONALE FOR MONITORING AND REPORTING REQUIREMENTS**

Section 122.48 of 40 CFR requires all NPDES permits to specify recording and reporting of monitoring results. Sections 13267 and 13383 of the California Water Code authorize the Water Boards to require technical and monitoring reports. The Monitoring and Reporting Program, Attachment E of this Order, establishes monitoring and reporting requirements to implement federal and state requirements. The following provides the rationale for the monitoring and reporting requirements contained in the Monitoring and Reporting Program for this facility.

Ocean Plan Section III.G requires that Regional Boards shall require dischargers to conduct self-monitoring programs and submit reports necessary to determine compliance with the waste discharge requirements, and may require dischargers to contract with agencies or persons acceptable to the Regional Board to provide monitoring reports. Monitoring provisions contained in waste discharge requirements shall be in accordance with the Monitoring Procedures provided in Ocean Plan Appendix III.

The Monitoring and Reporting Program (MRP) is required to: 1) Document short and long term effects of the discharge on receiving waters, sediments, biota, and on beneficial uses of the receiving water; 2) Assess

compliance with the Ocean Plan, and; 3) Determine compliance with National Pollutant Discharge Elimination System (NPDES) terms and conditions.

#### **A. Influent Monitoring**

Influent monitoring is intended to: 1) Determine compliance with NPDES permit conditions and water quality standards; 2) Assess treatment plant performance, and; 3) Assess the effectiveness of the pretreatment program or source control ordinances.

#### **B. Effluent Monitoring**

1. **Intent of Effluent Monitoring** – Effluent monitoring is intended to: 1) Determine compliance with NPDES permit conditions and water quality standards; 2) Identify operational problems in order to improve plant performance, and; 3) Provide information on waste characteristics and flows for use in interpreting water quality and biological data.

#### **2. Changes in Monitoring Requirements –**

- a. **Addition of Fecal Coliform Monitoring** – Staff added effluent fecal coliform monitoring to the preexisting effluent total coliform monitoring contained in the previous MRP. The Ocean Plan's bacterial water quality objectives are expressed in terms of total and fecal coliforms. Effluent coliform monitoring substitutes for regular receiving water monitoring, so effluent monitoring should provide representative data for both total and fecal coliforms. Receiving water sampling is triggered by the exceedance of the maximum effluent total coliform limit, and includes the analysis of total and fecal coliforms in the receiving water. Effluent fecal coliform data will also provide a basis for comparing effluent and receiving water fecal coliform levels when the Discharger conducts receiving water sampling.
- b. **Addition of Monitoring to Evaluate Compliance with Effluent Limits** – Staff added selenium, endosulfan, endrin, HCH (the sum of alpha, beta, gamma (lindane) and delta isomers of hexachlorocyclohexane), and radioactivity effluent monitoring requirements in MRP Table IV-2. The existing Order No. 00-001 is based on the 1997 version of the Ocean Plan, and included water quality objectives for each of these added parameters. Though the previous Order included effluent limits for each parameter (except radioactivity), it did not include monitoring requirements. Central Coast Water Board staff and State Water Board staff recommend that Orders include monitoring provisions for parameters with effluent limits.

In addition, Appendix III of the Ocean Plan requires at least one complete scan of Ocean Plan Table B parameters annually for discharges in the range of one to ten MGD, which includes this Discharger. These added parameters are part of Ocean Plan Table B, and therefore should be analyzed at least annually.

- c. **Change in Ocean Plan Table B Sampling Frequency** – Staff changed the minimum sampling frequency for constituents in MRP Tables IV-2, IV-3, and IV-4 (representing Ocean Plan Table B parameters) from twice every other year, to once per year. Appendix III of the Ocean Plan requires at least one complete scan of Ocean Plan Table B parameters annually for discharges in the range of one to ten MGD, which includes the Discharger. The Discharger's compliance history does not indicate a need for continued monitoring above the Ocean Plan's minimum requirements.

Effluent sampling frequency for Ocean Plan Table B parameters in MRP No. 00-001 was required once in 2000, and conditionally thereafter in June and December of 2002 and 2004. If the Discharger did not find the constituents in significant quantities in the December 2000 sampling, in

lieu of sampling they were allowed to provide quarterly certification that the constituents were not added to the waste stream. Although this option was available, the Discharger sampled effluent for Ocean Plan Table B parameters every June and December.

Section G.2 of the 2001 Ocean Plan, *Monitoring Program*, contains language apparently allowing such certification. According to the State Water Board, however, the language was not intended for application to municipal waste dischargers such as the District (See the State Water Board's August 2004 Draft Functional Equivalent Document, *Amendment of the Water Quality Control Plan, Ocean Waters of California (California Ocean Plan)*, page 28, Section III.A). In light of this and other inadvertent misapplications of the certification clause throughout the state, State Water Board staff is currently proceeding with an Ocean Plan amendment to eliminate the certification clause. Changes to MRP No. R3-2005-0110 eliminate the certification clause.

Appendix III of the Ocean Plan, *Standard Monitoring Procedures*, establishes minimum effluent sampling requirements for Table B parameters depending on wastewater flow rate. For discharges between one and ten million gallons per day, the minimum monitoring frequency is one complete scan of Table B parameters annually. The Discharger's average daily wastewater flow rate is 1.4 MGD. The Ocean Plan does not specify whether to base monitoring on actual flows or permitted flows, but either basis results in the same minimum sampling frequency for this case.

The monitoring frequencies listed in Ocean Plan Appendix III represent the State Water Board's direction for what constitutes an adequate monitoring program for compliance with Table B water quality objectives or, equivalently, with effluent limitations derived from Table B objectives.

Based on the above, MRP No. R3-2005-0110, Tables IV-2, IV-3, and IV-4 require annual effluent sampling for all Ocean Plan Table B parameters, without the option of providing certification in lieu of monitoring. The timing of sampling is varied each year to represent different months of the year during typically dry-weather conditions.

The proposed sampling will continue to ensure an adequate data set is available before the next permit renewal, and may serve the State Water Board to assess the attainability of new or revised water quality objectives.

- d. Sampling Type – Regarding sample type (i.e., grab vs. 24-hour composite), staff added the following language to MRP Section IV, “Where specified in Table IV-2, IV-3, and IV-4, 24-hour composite samples shall be collected when appropriate for the constituent and the applicable approved laboratory analytical methods. The Discharger may otherwise employ grab samples”. 24-hour composite samples provide data that are more representative because they are collected over a longer period and can better account for the variability of domestic and municipal wastewater. Wherever feasible for a given parameter, it is therefore desirable to utilize this sample type. Staff recognizes that it is not practical to use 24-hour composite samples for some constituents due to characteristics such as volatility or degradation. The tables list the 24-hour composite sample as the preferred sample type. This above language, however, allows the Discharger to work with its certified laboratory to determine the most appropriate sample type.
- e. Addition of Constituents Introduced in the 2001 Ocean Plan – Staff added monitoring requirements for chlorodibromomethane, dichlorobromomethane, heptachlor epoxide, and N-nitrosodi-N-propylamine. These constituents were introduced in the 2001 Ocean Plan.
- f. Addition of Remaining Priority Pollutant Monitoring – MRP Table IV-5 lists the priority pollutants which are not included in Ocean Plan Table B, but for which monitoring data is required pursuant to 40 CFR 131.36 (7-1-03 Edition), and EPA Application Form 3510-2A (Rev. 1-99).

U.S. EPA Application Form 3510-2A (Rev. 1-99), which is a required part of the Discharger's Report of Waste Discharge every five years, requires a minimum of three pollutant scans within four and one-half years of the date of the application. The toxic pollutants listed in the application include Ocean Plan Table B parameters as well as other toxic pollutants not listed in the Ocean Plan. 40 CFR 131.36 (July 1, 2003 Edition) contains a similar priority toxic pollutant listing. MRP Table IV-5 lists these remaining priority toxic pollutants and requires annual sampling.

Of the toxic pollutants listed in MRP Table IV-5, all are common to U.S. EPA's application and 40 CFR 131.36, with the following exceptions: 1) Endrin Aldehyde is listed only in 40 CFR, and; 2) P-Chloro-M-Cresol and 4,6-Dinitro-O-Cresol are listed only in U.S. EPA's application.

Annual sampling of these remaining toxic pollutants will assure that a complete pollutant scan is available to meet U.S. EPA's minimum application requirements upon the expiration of Order No. R3-2005-0110.

#### C. Whole Effluent Toxicity Testing Requirements

In accordance with the Ocean Plan, Appendix III, *Standard Monitoring Procedures*, compliance monitoring for acute toxicity shall be determined using an EPA approved protocol as provided in 40 CFR PART 136. The presence of acute toxicity will be determined as specified in *Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms* (EPA-821-R-02-012, or subsequent editions). Acute toxicity monitoring shall be conducted using marine test species instead of freshwater species when measuring compliance. The Discharger shall use one of the approved marine test species identified in EPA-821-R-02-012, or subsequent editions.

In accordance with the Ocean Plan, Appendix III, *Standard Monitoring Procedures*, the Discharger shall use the critical life stage toxicity tests specified in Ocean Plan Table III-1, *Approved Tests - Chronic Toxicity (TUc)* to measure chronic toxicity.

#### D. Receiving Water Monitoring

##### 1. Surface Water

Receiving water monitoring is conducted to verify compliance with the Ocean Plan. Monitoring in the vicinity of the Discharger's Ocean Outfall must document water and sediment quality and biological communities at the "Zone of Initial Dilution" (ZID) boundary, at reference stations, and at areas beyond the ZID where discharge impacts might reasonably be expected.

- a. Receiving Water Monitoring Exception During Extreme Rain Events - Staff added the following paragraph to MRP Section VI.A.1 regarding shore station sampling triggered by effluent bacterial violations:

The Discharger shall to the best of its ability conduct the above receiving water sampling during dry weather or at least three days after a significant rain event. The Executive Officer may grant a discretionary exception to this sampling requirement during extreme rain events where receiving water sampling is unlikely to provide data representative of the Discharger's Discharge. The Discharger shall conduct effluent total and fecal coliform sampling daily during such events or the subsequent period of its influence on receiving waters. Once shore station sampling can resume, effluent sampling may return to its regular schedule according the Order.

This language is based on staff's Best Professional Judgement and recent experience during the extreme rainfall events that occurred along the Santa Barbara County coast during January 2005.

- b. Increase in Receiving Water Monitoring Frequency, when Required – Receiving water sampling is conditionally required at shore stations R-A, R-B, R-C, R-D, and R-E when three consecutive effluent total coliform limit violations occur. MRP No. 00-001 required this sampling once a week from June through September and monthly from October through May. Pursuant to Ocean Plan Section II.B, MRP No. R3-2005-0110 requires that, once receiving water is triggered, the Discharger shall collect no fewer than five samples for any 30-day period.

#### E. Other Monitoring Requirements

##### 1. Biosolids/Sludge Monitoring

See Section VII.B.1.d below, *Biosolids Requirements*. Staff changed MRP biosolids language according to the recommendations of U.S. EPA's Region IX Biosolids Coordinator ~~Coordinator~~.

##### 2. 2001 Ocean Plan Monitoring Provisions

Staff added the following monitoring sections according to provisions introduced in the 2001 Ocean Plan:

- a. MRP Section VIII – Minimum Levels
- b. MRP Section IX – Sample Reporting Protocols
- c. MRP Section X – Compliance Determination
- d. MRP Section XI – Pollutant Minimization Program

These sections are taken directly from the Ocean Plan for the Discharger's reference. Staff modified the language where applicable for the Discharger.

##### 3. Wastewater Collection System Overflows – Recordkeeping and Reporting

~~Staff added these sections to provide guidance on the types of sewer overflow records the Discharger should keep, and when overflow reporting is required. These sections are consistent with Water Code Section 13193, *Sanitary Sewer System Overflow Reports* (January 1, 2004 Edition). Staff removed Section XII (Wastewater Collection System Overflow Recordkeeping) requirements as they duplicate the Statewide General Permit requirements or sanitary sewer systems recordkeeping. In Order to eliminate the potential for redundant requirements between this Order and the General Permit, staff removed this Section from the Order.~~

Section XIII (now Section XII – Wastewater Collection Systems Overflow Reporting) was modified to remove language referring to the notification from spills under 1,000 gallons as well as other reporting obligations. However, language addressing 24-hour notification for spills equal to or greater than 1,000 gallons remains.

4. **Rainfall**

Staff added reporting of daily rainfall totals alongside facility flow measurement to facilitate the evaluation of the influence of inflow and infiltration on wastewater flows received at the facility.

VII. **RATIONALE FOR PROVISIONS**

A. **Standard Provisions**

Standard Provisions, which in accordance with 40 CFR §§122.41 and 122.42 apply to all NPDES discharges and must be included in every NPDES permit, are provided in Attachment D to the Order.

B. **Special Provisions**

1. **Special Provisions for Municipal Facilities (POTWs Only)**

- a. **Sanitary Sewer Overflow Reporting:** Staff derived the Central Coast Water Board sanitary sewer overflow reporting requirements from the Board's letter to all mailing list recipients dated July 26, 1995, and the Governor of California's Office of Emergency Services. This information is required to appropriately characterize the nature of a given spill, its impacts or potential impacts to public health and/or water quality, and the Discharger's corrective actions.
- b. **Wastewater Collection System Management Plan:** Section VI.C.1.b of Order R3-2005-0110 allows Carpinteria Sanitary District to request a reopening of the *Wastewater Collection System Requirements Provision* based on new information, including the State Water Resources Control Board's (State Water Board) adoption of a General Order regulating sanitary sewer collection systems. Carpinteria Sanitary District staff made a formal request in writing on September 13, 2006.

Since the adoption of Order No. R3-2005-0110 (October 21, 2005), the State Water Board adopted the *Statewide General Waste Discharge Requirements for Sanitary Sewer Systems Order No. 2006-0003-DWQ (General Permit)*, May 2, 2006. This General Permit provides regulatory oversight for the management, implementation, and reporting of Sanitary Sewer Management Programs. Carpinteria Sanitary District filed a complete application package to the State Water Board dated July 11, 2006, and obtained full enrollment status on August 18, 2006 (Waste Discharge Identification No. 3 SSO 10245).

Based on 40 CFR Section 122.62 (a)(2) (Anti-backsliding Requirements) and the adoption of the General Permit, staff proposes to remove requirements addressing wastewater collection system management, implementation, and reporting in the draft revised Order. Staff does not propose any changes to prohibitions, provisions, numeric and narrative effluent limitations or monitoring requirements identified in the existing Order. Order No. R3-2005-0110 establishes NPDES waste discharge requirements (WDRs) for the discharge of waste from the Carpinteria Sanitary District Wastewater Treatment Facility to the Pacific Ocean through the District's Ocean Outfall. As a result of removing this language, the following sections of the Order, MRP, and fact sheets were removed or modified.

- Section II.P (Findings) of the Order – Staff removed language addressing wastewater collection systems.

- Section II.Q (Findings) of the Order – Staff added language addressing the Statewide General Permit and the Districts enrollment under that program.
- Section VI.C.1.b (Special provisions) of the Order – Staff removed this section to eliminate duplication of the Statewide General Permit requirements.
- Section XII (Wastewater Collection System Overflow Recordkeeping) of the MRP – Staff removed this section as it duplicates the Statewide general Permit.
- Section XIII (Wastewater Collection System Overflow Reporting) of the MRP – Staff removed a majority of the language addressing spill/overflow notification and reporting. However, language addressing, 24-hour notification for spills of 1,000 gallons or more, remains.
- Section XIV, Table XIV-2 (Reporting Requirements) of the MRP – Staff removed language addressing wastewater collection system overflow cleanup protocol monitoring program and the final wastewater collection systems management plan.
- Section III.2 (Other Plans, Policies, and Regulations) of the Fact Sheet – Staff added language regarding the Statewide General Permit and the district enrollment under the program.
- Section VI.E (Other Monitoring Requirements) of the Fact Sheet – Staff modified the language to address recordkeeping and reporting requirements.
- Section VII.B.1 (Special provisions of Municipal Facilities) of the Fact Sheet – Staff modified the language to address the removal of wastewater collection systems management plan language throughout the Order, MRP, and the Fact Sheet.
- Attachment G (Elements of the Wastewater Collection System Management Plan) – Staff removed this attachment to eliminate duplication of the Statewide General Permit.

~~In accordance with the requirement to properly operate and maintain all treatment and control facilities of a POTW (Standard Provision I.D of this Order), this Order requires the development and implementation of a Wastewater Collection System Management Plan (Management Plan). This requirement provides for the continuation and incorporation of the Discharger's current collection system management efforts (including those resulting from U.S. EPA's Docket No. CWA 402-9-02-64, *Findings of Violations and Order for Compliance*, September 30, 2002, as discussed below), and provides guidance to assure that the Discharger considers all essential elements of operation, maintenance, management, and planning as appropriate for their collection system. The recommended Management Plan language is consistent with federal and state policies and laws which prohibit sewer overflows and mandate proper operation and maintenance of collection systems.~~

~~Along with the prohibition of sanitary sewer overflows, a Regional Board may include measures within waste discharge requirements supporting that prohibition. As a comprehensive means of complying with the prohibition, the proposed Management Plan elements provide a framework of measures by which a Publicly Owned Treatment Works (POTW) can develop and document the proper operation and maintenance of its collection system.~~

~~The draft permit prohibits overflows in accordance with the Clean Water Act. Consistent with this prohibition, the Central Coast Water Board may also require Dischargers to undertake measures to protect human health and the environment from harmful pollutants. Staff recommends the Discharger develop and implement an organized and documented Management Plan by which to comply with this requirement, and which must consider the minimum standards outlined in the permit.~~

~~The prohibition of sewer overflows and the proper operation and maintenance of collection systems are requirements contained in the Standard Provisions of this NPDES permit. The Central Coast Water Board is authorized to require that dischargers take actions to comply with these provisions. These Standard Provisions have been part of each of this Region's NPDES permits since at least 1985.~~

~~The Porter-Cologne Water Quality Control Act (Water Code) allows the Central Coast Water Board to impose requirements on discharges from collection systems (Water Code sections 13243, 13260, 13263).~~

~~**Federal Regulatory Support** Title 40 of the Code of Federal Regulations (40 CFR) Section 122.44 states that each NPDES permit shall include conditions meeting the requirements stated in that section when applicable. Sub-paragraph 122.44(k)(4) indicates that among the requirements to be included in NPDES permits are Best Management Practices (BMPs) to control or abate the discharge of pollutants when the practices are reasonably necessary to carry out the purposes and intent of the Clean Water Act.~~

~~The definition of "BMP" at 40 CFR 122.2 includes schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce pollution of waters. Furthermore, BMPs also include operating procedures and practices to control spillage or leaks. The definition of "pollutant" at 40 CFR 122.2 includes sewage.~~

~~The proposed NPDES permit would apply to a Publicly Owned Treatment Works (POTW). The definition of POTW at 40 CFR 403.3 includes sewers conveying wastewater to the treatment facility. 40 CFR therefore supports including collection system management language such as that included in this Order.~~

**U.S. EPA Administrative Order** – In June, 2002, U.S. EPA conducted a compliance evaluation of the Discharger's sanitary sewer collection system. On September 30, 2002, U.S. EPA issued Docket No. CWA-402-9-02-64, *Findings of Violation and Order for Compliance*, which required the Discharger to take remedial actions to reduce the number of sewage spills from its collection system. The U.S. EPA Administrative Order set forth a series of actions and plans for preparation and implementation according to required timelines, including the following:

- Immediate reduction of collection system spills
- Sanitary sewer overflow response planning
- Compliance with State and County emergency notification procedures
- Collection system capacity assessment
- Collection system assurance planning
- Collection system condition assessment and rehabilitation planning
- Pump station and force main maintenance, repair, and upgrades
- Fats, oils, and grease blockage control planning
- Plan review and approval by U.S. EPA



- Quarterly and annual reporting to U.S. EPA and the Central Coast Water Board

The U.S. EPA Order remains in effect until terminated by the Director of the Water Division for U.S. EPA, Region 9. Termination will not occur before December 31, 2005, unless the Director determines otherwise (Please note that U.S. EPA's Order is not a permit under the Clean Water Act). The development and implementation of the Wastewater Collection System Management Plan required by this Order is consistent with the above actions and plans required by U.S. EPA. The Management Plan should facilitate the continuation and further development of the above actions and plans to assure the continued improvement of the Discharger's collection system, which is also a condition of termination for U.S. EPA's Order. The Discharger should use actions and plans developed as a result of the U.S. EPA Order to comply with the Management Plan requirements wherever appropriate.

The U.S. EPA terminated the *Findings of Violation and Order for Compliance* Docket No. CWA-402-9-02-64 in a letter dated August 17, 2006. The District had requested termination of the Order in its August 7, 2006 annual report. Termination was based on the fact that the District fulfilled the requirements of the Order and that they have made a significant progress to reduce the number of sewage spills from its collection system. The termination relieved the District of their reporting obligation under the Order.

**CEQA** – Pursuant to CEQA Guidelines, Section 15301, the proposed WDRs are exempt from CEQA because they are for existing facilities. The permit is also exempt from CEQA pursuant to Water Code section 13389.

- c. **Pretreatment Program:** According to 40 CFR 403.8, *Pretreatment Program Requirements: Development and Implementation by POTW*, any POTW with a total design flow greater than five million gallons per day (MGD) and receiving from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW or are otherwise subject to Pretreatment Standards will be required to establish a POTW Pretreatment Program. The Discharger is not required to develop a Pretreatment Program at this time because its design flow is less than five MGD (design flow = 2.5 MGD).

The Central Coast Water Board, State Water Board, Regional Administrator, or Director may require that a POTW with a design flow of five MGD or less develop a POTW Pretreatment Program if he or she finds that the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through. The Central Coast Water Board has no information indicating these conditions exist, and therefore does not require the Discharger to develop a Pretreatment Program at this time.

The Discharger's Ordinance No. 7 (June 21, 1994) implements a Pretreatment Program which provides rules and regulations for the quality of wastewater discharged to the Discharger's facilities.

- d. **Biosolids Requirements:** 40 CFR 122.44(b)(2) states that each NPDES permit shall include standards for sewage sludge use or disposal.

Section 13377 of the Porter-Cologne Water Quality Control Act requires waste discharge requirements to include all provisions necessary to protect beneficial uses and prevent nuisance, whether or not specified by Division 7 of that Act.

Management of all biosolids and sludge must comply with all requirements of 40 CFR Parts 257, 258, 501, and 503, including all monitoring, record-keeping, and reporting requirements. Waste discharge requirements (WDRs) issued by Regional Water Boards in California also serve as federal NPDES permits, and so are issued with full authorization from the U.S. Environmental Protection Agency. While the Central Coast Water Board has not been delegated the authority to enforce the biosolids program, as federal NPDES permits, WDRs include state and federal regulatory language applicable to a waste discharge. U.S. EPA supplied and recommends the standard language in this permit, and offered the following commentary during a NPDES permit renewal adopted by the Central Coast Water Board on October 22, 2004 (for the City of Santa Barbara).

According to the U.S. EPA Region 9 Biosolids Coordinator, it was the original intent of the Clean Water Act that biosolids conditions be placed in all NPDES permits. The intent of permit language is also to go above and beyond the minimum reporting and notification requirements contained in the 40 CFR 503 rule itself, as additional mechanisms beyond the 503 requirements are needed to require notice of violations, reporting of all use and disposal practices, interstate notification for all use and disposal practices, handling of biosolids at the plant site and prior to final use or disposal, etc.

Because dischargers may change practices within the five-year span of a permit, the standard language recommended for NPDES permits is intended to place conditions for specific use or disposal practices, which become applicable if the Discharger selects that specific use or disposal option.

The 503 rule is very clear that the preparer of the biosolids is responsible for the use or disposal. After several court cases where POTWs contracted with composters and then continued to send their biosolids to the compost sites even after it became blatantly evident that the "composters" were not composting and/or distributing the finished compost, U.S. EPA decided it was desirable to put a clause in permits clarifying that the POTW still retains responsibility for the biosolids through final use or disposal. This is a necessary incentive for POTWs to terminate a contract with composters who are not performing, and to clean up if a composter leaves the country and leaves behind the biosolids.

Where a Discharger transfers biosolids to a composter (which must test the pollutant levels of the final compost), testing of the biosolids by the Discharger prior to being blended with other biosolids is desirable from a pretreatment standpoint. Many Dischargers are required to test priority pollutants as part of the pretreatment program; however, the pretreatment requirements do not cover all the metals regulated under 40 CFR 503, or require use of the solid waste methods and conversion to 100% dry weight basis. Therefore, in some cases the 503 tests are more indicative of any source control problems. The composter typically also requires this data from a Discharger, so that the composter can identify any biosolids feedstocks with high metal concentrations.

Central Coast Water Board staff agrees with U.S. EPA that the permit should properly disclose the Discharger's responsibilities regarding biosolids disposal, and so recommends the biosolids language provided by U.S. EPA for the Order and MRP.

## VIII. PUBLIC PARTICIPATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the Carpinteria Sanitary District Wastewater Treatment Facility. As a step in the WDR adoption process, the Central Coast Water Board staff has developed tentative WDRs. The Central Coast Water Board encourages public participation in the WDR adoption process.

### A. Notification of Interested Parties

Staff notified the Discharger and interested parties that the Central Coast Water Board proposed to revise Order R3-2005-0110 by a letter dated September 14, 2006. The letter included *Instructions to Applicant for Reissuance of Waste Discharge Requirements*, which required posting and publication no later than September 20, 2006. The Discharger provided public notification by posting and publishing in the Santa Barbara News Press on September 20, 2006, and through direct mailing of the Revised NPDES permit to the known interested parties list. Written comments were due no later than October 20, 2006. Staff did not receive written comments on the reopened permit.

For the October 21, 2005 adopted permit, the Central Coast Water Board has notified the Discharger and interested agencies and persons of its intent to prescribe waste discharge requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. The Discharger provided public notification by posting and publishing notice according to the Central Coast Water Board's *Instructions to Applicant for Reissuance of Waste Discharge Requirements*, which staff provided by letter dated July 12, 2005. The instructions required posting and publication no later than July 27, 2005, the details of which will be noted in this section upon completion.

### B. Written Comments

The staff determinations are tentative. Interested persons are invited to submit written comments concerning these tentative WDRs. Comments should be submitted either in person or by mail to the Executive Office of the Central Coast Water Board at the address above (please see the cover page of this Order).

To be fully responded to by staff and considered by the Central Coast Water Board, written comments should be received at the Central Coast Water Board offices by 5:00 p.m. on August 26, 2005.

Staff responses to written comments received are provided below.

1. Staff Responses to Comments from the Carpinteria Sanitary District. Some of staff's recommended changes are indicated in double-underline and strikeout.

- a. Order Tables IV-3 and IV-4

It is understood that effluent limitations prescribed in these tables are based on Ocean Plan Table B criteria. The District is concerned that a future Reasonable Potential Analysis (RPA) may show that no potential exists to discharge one or more of the listed constituents and that subsequent removal of numerical limits would be prohibited by anti-backsliding provisions in Paragraph II.J of the Tentative Order.

**Staff Response:** Paragraph II.J of the Tentative Order notes that exceptions may allow for relaxing limitations. If future analyses indicate that reasonable potential does not exist for particular constituents, then staff may recommend revisions to limitations based on that new

## VIII. PUBLIC PARTICIPATION

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is considering the issuance of waste discharge requirements (WDRs) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for the Carpinteria Sanitary District Wastewater Treatment Facility. As a step in the WDR adoption process, the Central Coast Water Board staff has developed tentative WDRs. The Central Coast Water Board encourages public participation in the WDR adoption process.

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1. Staff Responses to Comments from the Carpinteria Sanitary District. Some of staff's recommended changes are indicated in double-underline and strikeout.

a. Order Tables IV-3 and IV-4

It is understood that effluent limitations prescribed in these tables are based on Ocean Plan Table B criteria. The District is concerned that a future Reasonable Potential Analysis (RPA) may show that no potential exists to discharge one or more of the listed constituents and that subsequent removal of numerical limits would be prohibited by anti-backsliding provisions in Paragraph II.J of the Tentative Order.

**Staff Response:** Paragraph II.J of the Tentative Order notes that exceptions may allow for relaxing limitations. If future analyses indicate that reasonable potential does not exist for particular constituents, then staff may recommend revisions to limitations based on that new

information [Title 40 Code of Federal Regulations (CFR) Part 122.44(l)(2)(i)(B)(1)] as long as the revisions do not allow degradation.

b. Order Paragraph V.A.2.b

This provision requires the District, when directed by the RWQCB or its Executive Officer, to conduct a "sanitary survey" and to control any controllable discharges identified therein. This paragraph is ambiguous and could subject the District and its ratepayers to significant investigative and remedial costs to address water quality issues wholly unrelated to its discharge. It is recommended that this paragraph be deleted from the Tentative Order.

**Staff Response:** The California Ocean Plan, Section III.D.1.b, states, "Waste discharge requirements shall require the discharger to conduct sanitary surveys when so directed by the Regional Board. Waste discharge requirements shall contain provisions requiring the discharger to control any controllable discharges identified in a sanitary survey." Sanitary surveys which the District may conduct would necessarily be targeted at waste discharges within the District's jurisdiction.

**Staff Revision:** Staff changed the second sentence to "The Discharger shall control any controllable discharges within its jurisdiction identified in a sanitary survey."

c. Order Paragraph VI.C.1.a. – Biosolids Requirements

Subparagraph (1) of this section states that the SWRCB or RWQCB has not been delegated the authority to implement a biosolids program pursuant to regulations promulgated under 40 CFR Part 503. Including detailed provisions related to biosolids management in the Tentative Order is contrary to this statement. While it is clearly the District's responsibility to comply with the Federal requirements, we do not believe it is appropriate to include these provisions in the Tentative Order. The District's biosolids management practices, which involve off-site co-composting to achieve Class A, Exceptional Quality standards, make most of the detailed provisions set forth in this section inapplicable to our operations. For the sake of clarity and permit streamlining, it is recommended that this section be deleted in its entirety. The District will continue to maintain 100% compliance with biosolids management, monitoring, processing and reuse requirements of 40 CFR Part 503 throughout the permit cycle.

**Staff Response:** It was the original intent of the Clean Water Act that biosolids conditions be placed in all National Pollutant Discharge Elimination System (NPDES) permits. The Porter-Cologne Water Quality Control Act requires waste discharge requirements to include all provisions necessary to protect beneficial uses and prevent nuisance, whether or not required by Chapter 5.5 (NPDES requirements). Furthermore, 40 CFR 122.44(b)(2) states that each NPDES permit shall include standards for sewage sludge use or disposal.

Waste discharge requirements (WDR) issued by Regional Boards in California also serve as federal NPDES permits, and so are issued with full authorization from the U.S. Environmental Protection Agency (EPA). While the Regional Board has not been delegated the authority to enforce the biosolids program, as federal NPDES permits, WDR include state and federal regulatory language applicable to a waste discharge. Since the U.S. EPA Region IX Biosolids Coordinator has supplied and recommended the language for the tentative Order, and because of its applicability to the District, staff continues to recommend its cooperative inclusion in NPDES permits.

Staff agree with U.S. EPA that the permit should properly disclose the District's responsibilities regarding biosolids disposal. Since the District must comply with the biosolids program regardless of whether the permit contains biosolids language, staff does not agree that removing

the language improves disclosure or clarifies the District's responsibilities to comply with biosolids requirements.

Although it may not be the District's intent at this time, other biosolids disposal or reuse methods may become necessary during the five-year life of the tentative Order. The language in the Order is intended to place conditions for specific use or disposal practices, which become applicable if the District selects that specific use or disposal option.

d. Order Paragraph VI.C.1.b. – Wastewater Collection System Requirements

The District currently implements a comprehensive, proactive collection system management program. In response to a series of wet-weather sanitary sewer overflows that occurred in the late 1990's, the District embarked on a strategic plan to fully assess and remedy deficiencies throughout its collection system. This substantial, ongoing effort has included major commitments of capital improvement dollars to upgrade pump stations and buried infrastructure within our service area. In 2000, the US Environmental Protection Agency issues the District an Administrative Compliance Order (ACO) which directed implementation of the already planned response measures according to a fixed schedule. The District has maintained strict compliance with the ACO. All reporting and documentation has been copied to the RWQCB. To date, the improvements have dramatically reduced the frequency and severity of sanitary sewer overflows (SSOs) experienced here.

The District is fully committed to responsible management of its collection system. We understand and support the concept of a regulatory framework for collection systems that is intended to reduce SSOs and protect water quality. However, the District does not believe that prescriptive collection system management requirements should be included as NPDES Permit provisions. We recommend that this entire section, as well as Attachment G, be removed from the Tentative Order. The basis for this recommendation is outlined below:

- (1) The SWRCB is in the final development stage of Statewide General Waste Discharge Requirements for Sewage Collection System Agencies (General WDRs). A copy of the most recent public review draft of this document (dated 8/1/2005) is provided as Attachment A.

**Staff Response:** Comment noted.

- (2) Attachment B is an implementation timeline for the General WDRs. It is anticipated that adoption by the SWRCB will occur in October 2005. This timing basically coincides with adoption of the District's final NPDES Permit.

**Staff Response:** It is uncertain when and if the State Board will adopt WDRs for collection systems. As of September 27, 2005, State Board's consideration of such WDRs was delayed until at least January 2006.

- (3) The General WDRs are, in fact, more comprehensive than the Wastewater Collection System Requirements set forth in the Tentative Order. Compliance with the WDRs will provide for equivalent water quality protection.

**Staff Response:** Staff cannot compare the tentative Order's proposed language to the State's until State Board adopts a WDR.

- (4) The General WDRs will provide a level playing field for all collection system operators in California. Implementation will be uniform and in accordance with reasonable time schedules.

**Staff Response:** Comment noted.

- (5) The General WDRs, in their current form, have been developed with extensive stakeholder input. Attachment C provides a list of Guidance Committee members, which includes large and small collection agencies, consultants, non-governmental organizations, federal agencies, RWQCB staff and SWRCB staff. Contrarily, the Wastewater Collection System Requirements set forth in the Tentative Order were developed without any input from the regulated community.

**Staff Response:** The language in the tentative Order was first developed by U.S. EPA in the mid 1990's with extensive stakeholder input. When the federal collection system regulatory efforts were postponed, the Santa Ana Regional Water Board used U.S. EPA's language to prepare a collection system general WDR for approximately 20 agencies, again, with extensive input from those agencies. The Central Coast Water Board first used Santa Ana's language to implement collection system WDRs in the Monterey area, meeting with the multiple agencies involved. It is notable that the language changed very little throughout these different phases of development, indicating the broad applicability incorporated into the language through working with the regulated community. Collectively, extensive resources were dedicated to developing the guidelines proposed in the tentative Order.

The regional boards have subsequently provided all affected agencies with opportunities to provide recommendations during the comment periods (typically four to six weeks) for numerous permit renewals over the last three years. As an indication of the effectiveness of the earlier collaborative efforts of U.S. EPA, the Santa Ana Water Board, and the Central Coast Water Board, the comments from multiple agencies over the last three years have not resulted in the Central Coast Water Board making any significant refinements to the language.

- (6) A key element of the statewide General WDR program is a standardized online (web-based) reporting system. This application will streamline SSO reporting at all levels. If the collection system provisions of the Tentative Order are retained, the District will be subject to duplicative and burdensome reporting requirements.

**Staff Response:** Staff agrees that the State's tentatively proposed electronic reporting system has great potential. Once such a system is operational, staff intends to utilize it for all SSO reporting. At that time, any duplicative reporting requirements can be revised by the Executive Officer during the transition to a new system. It is important to maintain the proposed reporting requirements until any online reporting system is fully functional.

- (7) Including collection system management requirements and absolute SSO prohibitions in the Tentative Order will expose the District and its ratepayers to expensive, third party citizen lawsuits for any instance of noncompliance, regardless of circumstances. This is a real threat that must be considered by the RWQCB. The statewide General WDR regulatory process will provide an equivalent level of water quality protection and enhancement, without the same level of exposure to litigation.

**Staff Response:** The District's current Order already includes the prohibition of overflows (Order No. 00-001, Discharge Prohibition A.3), as is standard practice for this and other regional boards. The Clean Water Act provides for third-party lawsuits for discharges to surface waters regardless of whether a permit covers the responsible party. The conditions of the tentative Order are the same as the previous Order.

Though the State Water Board may not include such a prohibition in a statewide collection system WDR, Regional Board staff will recommend its continued implementation in the Order.

- (8) US EPA supports the statewide General WDR approach for collection system management. EPA staff has indicated that inclusion of three Standard Provisions in NPDES permits – duty to report; duty to mitigate; and duty to operate and maintain – is satisfactory from a regulatory perspective to control SSOs.

**Staff Response:** The Central Coast Water Board is not limited to adopting only the minimal federal provisions. Such an approach may suffice in terms of general enforcement, but it does little to promote a consistently thorough approach to managing and operating sewage collection systems.

U.S. EPA has, in fact, spearheaded the development of the collection system language proposed in the tentative Order, as discussed above.

- (9) The SWRCB will not exclude the District from the General WDR on the basis that its operations are covered by specific NPDES Permit provisions. Strict compliance with both regulatory programs will result in duplication of effort and poor use of limited resources.

**Staff Response:** The Central Coast Water Board retains discretion in deciding which regulatory approach to apply in its region. Coverage under two Orders for the same purpose will not occur.

- e. Order Attachment G. – Elements of the Wastewater Collection System Management Plan  
The wastewater collection system provisions of the Tentative Order require the District to prepare a Wastewater Collection System Management Plan in accordance with Attachment G. The District's comments on Attachment G are provided below:

- (1) In the District's opinion, the comprehensive and detailed requirements set forth in Attachment G (Elements of the Wastewater Collection System Management Plan) are overly prescriptive and, in essence, they dictate the manner of compliance with the Tentative Order. This is inconsistent with Water Code Section 13360(a).

**Staff Response:** The measure to be achieved is the development and implementation of a Management Plan. According to the proposed language, it is the District's responsibility to describe the manner in which it will address the areas of collection system management described in Attachment G. Providing an organizational structure in the permit which a permittee will use to develop its own plan and manner of implementation is consistent with Water Code Section 13360.

- (2) The District has already prepared and implemented many of the required Wastewater Collection System Management Plan (WCSMP). Redevelopment, repackaging, and related compilation efforts to satisfy the Attachment G requirements will require substantial outlay



of resources and funding that could be better used to maintain and/or improve the District's collection system.

**Staff Response:** In cases where a program element already exists, it may be referenced to or incorporated within the Management Plan. Staff agrees that duplication of plan elements is a waste of resources.

- (3) The District also questions the annual update requirements for many of the plan elements. For example, a very limited number of new connections are made within the District's service area each year. Annual updates of a Capacity Assurance Plan are not appropriate and would merely be an exercise. This and similar efforts would divert staff time from critical maintenance and rehabilitation activities.

**Staff Response:** Tentative Order Attachment G, Section X requires annual Management Plan audits appropriate to the collection system and its compliance status. The District will assess where deficiencies exist and what corrective actions are necessary. Attachment G does not mandate that the District update Management Plan sections unless the audit reveals that a change is necessary to meet collection system needs or to maintain or achieve compliance.

- (4) Paragraph IV.I of Attachment G requires the District to develop a plan for responding to and preventing SSOs from private property. The District must take exception to this requirement because it lacks jurisdiction to respond to overflows on private property in most cases. We have and will continue to take necessary actions to protect water quality, however, this requirement is not appropriate and should be removed from the WCSMP requirements.

**Staff Response:** This plan element states, "Establish a plan for responding to overflows from private property that discharge to public right of ways and storm drains, to prevent discharges from overflows to surface waters and storm drains."

Any person who discharges sewage is responsible and liable for that spill. The proposed Order does not assign responsibility of privately owned systems to the District, nor does the proposed Order indicate that the District owns or maintains private sewer laterals. However, once a spill reaches public property, the local public agency becomes responsible to notify the public and direct cleanup. In addition, sewerage entities and other local authorities have some ability to prevent overflows from laterals by, for example, imposing requirements in sewer hook-up permits, building ordinances, or ordinances that require inspection and maintenance of laterals upon property transfer.

In some cases, the local sewerage agency may be the only capable response option. The Management Plan does not discount the role that private companies may play in responding to private sewage spills, nor does it preclude the District from billing responsible parties for any services rendered.

This Management Plan element does not require the District to respond to all private spills. It requires the District to develop a plan of response for those spills which become a threat to public health and the environment.

**Staff Revision:** Staff made the following changes to Attachment G, Section IV.I: "Establish a plan for responding to overflows from private property that discharge to public right-of-ways and storm drains, to prevent discharges from overflows to surface waters and

storm drains, to the extent the District has jurisdiction to do so. For example, where the District has no jurisdiction over the public right-of-way or storm drain toward which an overflow is migrating or to which it is discharging, the plan may consist of reporting overflows to the appropriate authority for corrective action, directing property owners to the appropriate authorities, and advising property owners of the need to hire a private plumber.

- (5) There is no discussion of the RWQCB review and approval process. Conforming our current collection system management process and its structural elements to satisfy the Attachment G requirements will require significant effort. The District would appreciate some assurance that there will be meaningful review and approval of the WCSMP by the RWQCB.

**Staff Response:** Staff welcomes the opportunity to review completed management plans and offer comments when needed. Regional Board formal approval is not currently required. It is the District's responsibility to assure its Management Plan is appropriate for its collection system needs and state of compliance.

f. Monitoring and Reporting Program Paragraph III.A.1

The hydraulic design of the District's treatment facility directs certain intermittent in-plant return flows to the influent wet well downstream of the influent (headworks) monitoring location. These return flows include filtrate from solids dewatering activities and wash water from periodic cleaning and maintenance activities within the plant. Flow measurements, particularly instantaneous flow values, reflect these in-plant return flows. Flow measurements are continuously recorded on a circular chart.

Collection of monthly samples for BOD and Total Suspended Solids (TSS) analysis is coordinated with plant O&M activities so that no return in-plant flows are diverted to the influent wetwell during the 24-hour monitoring period. Costs to physically modify the WWTF or the influent sampling location are significant. It is requested that this paragraph be modified to indicate the presences of intermittent in-plant return flows as described and to allow sampling at the existing confluent sampling location.

**Staff Response:** Staff agrees.

**Staff Revision:** Staff changed the first sentence of this paragraph as follows:

"Sampling stations shall be established at each point of inflow to the treatment plant, and shall be located upstream of ~~isolated from and/or corrected for~~ any in-plant return flows in order to obtain and where representative samples of influent can be obtained."

g. Monitoring and Reporting Program Paragraph III.A.1 / Paragraph IV.A.1

These paragraphs state that composite samples (influent/effluent) shall be collected using a proportional sampling device approved by the Executive Officer. Please describe the requirements and/or process for approval. The District currently uses refrigerated composite samplers manufactured by American Sigma or ISCO.

**Staff Response:** The Executive Officer recognizes these manufacturers as common providers of appropriate sampling equipment. Use of sampling devices is subject to Executive Officer's approval, however, it is the District's responsibility to demonstrate that selected sampling devices are capable of accurately and consistently evaluating compliance. The District may

notify and/or inquire about proposed devices as the need arises, however, there is no formal process of approval.

h. Monitoring and Reporting Program Table IV-1

Chronic toxicity monitoring is required semi-annually in the months of March and December. Please verify that these are the desired months for monitoring. Historically, semi-annual samples would be required with six-months separation instead of the four month period set forth in the MRP.

**Staff Response:** The District is correct. Staff intended sampling in June and December.

**Staff Revision:** Staff corrected the semi-annual chronic toxicity testing to June and December, instead of March and December.

i. Monitoring and Reporting Program Table VI-1

This table indicates ocean sampling stations "1 through 8" in column 3. The MRP only sets forth five (5) ocean monitoring locations. The table should be modified to read "1 through 5" where appropriate.

**Staff Response:** Monitoring and Reporting Program (MRP) Section II identifies the five ocean sampling stations as R-1, R-2E, R2-W, R-3, and R-4.

**Staff Revision:** Staff corrected the ocean sampling station column of MRP Table VI-1, *Bottom Sediment Sampling*, to "R-1, R-2E, R2-W, R-3, R-4".

j. Monitoring and Reporting Program Section XII: Wastewater Collection System Overflows - Recordkeeping

As previously discussed, the District recommends that specific or explicit requirements for collection system record keeping be excluded from the Permit and MRP. Record retention requirements proposed for inclusion in the Statewide General WDR are very similar to those outlined in the Tentative Order. A standard provision requiring compliance with the General WDR would achieve the same objective and would streamline the permit process.

**Staff Response:** Because of the uncertainty of the final form of a State Water Board General WDR for collection systems, and whether the Central Coast Water Board will elect to utilize such a WDR, staff does not recommend any changes.

k. Monitoring and Reporting Program Section XIII: Wastewater Collection System Overflows - Reporting

The District further recommends that specific or explicit requirements for collection system reporting be excluded from the Permit and MRP. Comprehensive collection system overflow reporting requirements are proposed for inclusion in the Statewide General WDR. Spill classification and reporting criteria are similar to that outlined in the Tentative Order. The SWRCB has developed a web-based online reporting system and SSO database that is intended to streamline and standardize the SSO reporting process. This online reporting system is expected to be more significant and more efficient than the current written reporting procedures. A standard provision requiring compliance with the General WDR would achieve the same objective and would streamline the permit process.

**Staff Response:** The final form of a State Water Board General WDR for collection systems, the availability of a planned web-based reporting system, and whether the Central Coast Water Board will elect to utilize a statewide WDR are all uncertain at this time. The Executive

Officer can revise reporting elements once these questions are answered, so staff recommends no changes.

l. Monitoring and Reporting Program Paragraph XIII.A.4

The requirement to collect "upstream and downstream" samples subsequent to a SSO is ambiguous for several reasons. In the opinion of the District, upstream monitoring should only be required when the discharge is to a creek, stream, or similar open, accessible channel with continuous background flow. If the SSO is to a non-flowing waterbody, such as an estuary, pond or the Pacific Ocean, "upstream" sampling is not possible. In the case of a discharge to a stormdrain, upstream and downstream sampling may be difficult or impossible. The District does not have jurisdiction to access storm drain manholes owned by the City of Carpinteria or the County of Santa Barbara. Furthermore, entering a stormdrain for the purpose of sample collection could expose District staff to unsafe conditions, particularly during rainfall events. It is recommended that this paragraph be modified to clarify SSO monitoring requirements and to fully define "upstream" and "downstream" sampling locations and protocols.

**Staff Response:** The District's interpretation is correct. The paragraph states, "When samples are collected, sampling points upstream and downstream of the point of discharge to a receiving water..." The paragraph acknowledges the District's discretion is determining when sampling is appropriate, directs any sampling to the evaluation of receiving waters, and does not express the need to sample within storm drains nor to unduly endanger District staff.

m. Monitoring and Reporting Program Paragraph XIV.B.1

The District is actively pursuing implementation of electronic on-line reporting through the SWRCB CIWQS eSMR system. This electronic reporting system is expected to be functional in October or November 2005. It is requested that formal notification to submit reports electronically, pursuant to this paragraph, be provided by the SWRCB or the RWQCB as soon as possible. There are significant costs and resource requirements associated with updating the District's SMR preparation software to be consistent with the Tentative Order, particularly for annual and semi-annual reporting.

**Staff Response:** Comment noted.

n. Monitoring and Reporting Program Paragraph XIV.C.1

The District is actively pursuing implementation of electronic on-line reporting through the SWRCB CIWQS eSMR system. This electronic reporting system is expected to be functional in October or November 2005. It is requested that formal notification to submit DMRs electronically, pursuant to this paragraph, be provided by the SWRCB or the RWQCB as soon as possible. There are significant costs and resource requirements associated with updating the District's DMR preparation software to be consistent with the Tentative Order, particularly for annual and semi-annual reporting.

**Staff Response:** Comment noted.

o. Monitoring and Reporting Program Paragraph XIV.D.1

The District takes no exception to the notification requirements set forth in this paragraph in the event of a disinfection process malfunction. Facsimile notification has been and will continue to be provided to those entities and individuals prescribed by the Department of Health Services. With respect to the requirement to monitor receiving water at sampling stations R-F, R-G and three other shore sampling stations for seven days after loss of disinfection, no parameters have been identified for analysis. Furthermore, no thresholds have been set forth to assess the level of impairment, if any, nor to differentiate between background receiving water

quality and quality of receiving water potentially affected by the discharge. Also, while the District understands that it is responsible to determine when an "Event" has occurred, the language regarding a potential or actual discharge of inadequately disinfected effluent is unclear and ambiguous. It may not be consistent with the "loss of disinfection" language in the fourth paragraph of this section. Specific criteria or clarification of this requirement would be helpful to the District.

**Staff Response:** The sampling conducted should include total and fecal coliforms, and enterococcus. The data will be compared to existing receiving water objectives and standards for the protection of beneficial uses and public health to assess any potentially adverse impacts.

The monitoring stations are located in the immediate vicinity of the discharge and include three shore stations already designated as appropriate for recreational areas nearest the discharge. Therefore, the stations are presumed to be within waters potentially affected by the discharge.

Staff interprets the "loss of disinfection" to describe the operational malfunction included in the definition of "Event", which causes the potential discharge of inadequately disinfected effluent. The phrase "potential or actual" is appropriate because the notification times (within four hours) do not allow for a definite determination of whether the effluent bacteria concentrations are a threat to the receiving waters (which takes at least 24 hours).

**Staff Revision:** Staff changed the first sentence of the last paragraph of this section to indicate that monitoring shall be conducted for total coliforms, fecal coliforms, and enterococcus.

## 2. Staff Responses to Comments from the California Department of Health Services

- a. The following comments are provided to the Tentative Order No. R3-2005-0110 to better improve the interaction between the Carpinteria Sanitary District and the commercial shellfish activities in the Santa Barbara area:

- (1) Page 13, paragraph V.A.1.b.1) – this paragraph, under the main heading of "Receiving Water Limitations", provides the bacterial standards for any shellfish growing area. It states that, "In any 60-day period, the 'median' total coliform density shall not exceed 70 (MPN) per 100 mL, and not more than ten percent of the samples shall exceed 230 (MPN) per 100 mL.

The bacteriological standard provided in the National Shellfish Sanitation Program (NSSP) Model Ordinance (2003) requires that for approved shellfish growing areas, the fecal coliform medium or geometric mean shall not exceed 14 MPN per 100 mL, and the estimated 90th percentile for the most recent 30 samples shall not exceed 43 MPN per 100 mL. It is requested that this standard be used in lieu of the requirements stated above. (Note: the NSSP Model Ordinance indicates that these fecal coliform limits are equivalent to the total coliform numbers provided in the proposed WDR).

**Staff Response:** The shellfish harvesting standards in the tentative Order are from the California Ocean Plan, which is subject to change only by the State Water Board. Please contact the Ocean Standards Unit if you would like to recommend the incorporation of NSSP standards into the Ocean Plan. In addition, since you note that the NSSP fecal coliform standards are equivalent to the total coliform standards already in the tentative Order, staff recommends no changes at this time.

- (2) Page E-4, Note 3 – the phone number for the Department of Health Services should be 510-412-4635.

**Staff Response:** Comment noted.

**Staff Revision:** Staff corrected the DHS phone number.

- (3) Page E-33, paragraph XIII. – this section deals with the notifications required for sewage spills. Sewage spills involve raw sewage and often are more of a threat to shellfish growing waters than a treatment plant malfunction. It is requested that DHS be notified of such occurrences, similar to the Central Coast Regional Water Quality Control Board.

**Staff Response:** Staff agrees.

**Staff Revision:** Staff added DHS contact information to Monitoring and Reporting Program Section XIII

- (4) Page E-34, paragraph XIV.D.1. – this paragraph discusses the “Notification and Monitoring Procedure in Case of Disinfection Failure. Prompt notification requirements are an integral part of the Management Plan for shellfish growing areas, and the RWQCB is to be commended for including it in the WDRs.

In the top paragraph, the term “Santa Barbara Nearshore Aquaculture Area” is used as a term for the general locations of the shellfish growing areas in the Santa Barbara area. Actually, “Nearshore” refers to one specific growing area leased by one specific grower. A better general term would be “offshore of the Santa Barbara coast”. This paragraph also states that the notification shall be by facsimile transmission. It is requested that a telephone notification (by direct conversation or voice mail message (Note: all commercial growers are required to have a 24-hour voice mail service)) be required, in addition to the facsimile transmission. A phone call will provide a more prompt notification in most cases, and therefore is more protective of public health. Additionally, a phone message can be accessed remotely, unlike a fax. A facsimile notification does not provide adequate public health protection since it might not get picked up for a considerable length of time.

**Staff Response:** Staff agrees.

**Staff Revision:** Staff changed the phrase “Santa Barbara Nearshore Aquaculture Area” to “offshore of the Santa Barbara Coast.”

Staff added the requirement to notify shellfish growers by telephone as well as facsimile.

### C. Public Hearing

The Central Coast Water Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

**Date:** October 21, 2005

**Time:** The meeting is scheduled to begin at 8:30 a.m. This public hearing is not currently scheduled for a particular time during the meeting, and the Board may take up the issue at any time. Please see the meeting agenda upon publication (approximately two weeks before the hearing date).

**Location:** Santa Barbara County Supervisors Board Hearing Room  
105 East Anapamu Street – 4<sup>th</sup> Floor  
Santa Barbara, CA 93101

Interested persons are invited to attend. At the public hearing, the Central Coast Water Board will hear testimony, if any, pertinent to the discharge, WDRs, and permit. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

Please be aware that dates and venues may change. Our web address is [www.waterboards.ca.gov/centralcoast](http://www.waterboards.ca.gov/centralcoast), where you can access the current agenda for changes in dates and locations.

**D. Waste Discharge Requirements Petitions**

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Central Coast Water Board regarding the final WDRs in accordance with Section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The petition must be submitted within 30 days of the Central Coast Water Board's action to the following address:

State Water Resources Control Board  
Office of Chief Counsel  
P.O. Box 100, 1001 I Street  
Sacramento, CA 95812-0100

Persons may find additional instructions for filing petitions at: <http://www.waterboards.ca.gov/html/petitions.html>, or may request them from Central Coast Water Board staff shown below in Fact Sheet Section VIII.G.

**E. Information and Copying**

The Report of Waste Discharge (RWD), related documents, tentative effluent limitations and special provisions, comments received, and other information are on file and may be inspected at the address above at any time between 8:30 a.m. and 4:45 p.m., Monday through Friday. Copying of documents may be arranged through the Central Coast Water Board by calling or faxing Sue Gerdsen at (805) 549-3465 (phone) or (805) 788-3521 (fax).

**F. Register of Interested Persons**

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact the Central Coast Water Board, reference this facility, and provide a name, address, phone number, fax number, and email address.

**G. Additional Information**

Requests for additional information or questions regarding this order should be directed to Todd Stanley at (805)542-4769 or [tstanley@waterboards.ca.gov](mailto:tstanley@waterboards.ca.gov), or Gerhardt Hubner at (805) 542-4647 or [ghubner@waterboards.ca.gov](mailto:ghubner@waterboards.ca.gov).

## **ATTACHMENT G - ELEMENTS OF THE WASTEWATER COLLECTION SYSTEM MANAGEMENT PLAN**

In accordance with Order Section VI.C.1.b, *Wastewater Collection System Requirements*, the Discharger is encouraged to use its existing programs or practices to address the Management Plan elements listed below. Where the Discharger determines that an element does not apply to its collection system, the Discharger shall provide in the appropriate section of its Management Plan the rationale for omitting the element.

- ~~I. **Goals:** The goal of the Wastewater Collection System Management Plan is to prevent overflows and to provide a plan and schedule for implementation of measures to prevent overflows.~~
- ~~II. **Organization:** The Wastewater Collection System Management Plan must identify the following components:~~
- ~~A. Administrative and maintenance positions responsible for implementing measures in the Wastewater Collection System Management Plan program, including lines of authority by organization chart or similar document; and~~
  - ~~B. The chain of communication for reporting overflows, from receipt of a complaint or other information, including the person responsible for reporting overflows to the Central Coast Regional Water Quality Control Board, Santa Barbara County Health Department, and the State Office of Emergency Services (OES).~~
- ~~III. **Legal Authority:** The Wastewater Collection System Management Plan shall include or make reference to legal authority, through sewer use ordinances, service agreements, or other legally binding procedures, to:~~
- ~~A. Control infiltration and connections from inflow sources, including satellite systems;~~
  - ~~B. Require that sewers and connections be properly designed and constructed;~~
  - ~~C. Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals within the Discharger's jurisdiction); and,~~
  - ~~D. Limit fats and greases and other debris that may cause blockages in the collection system.~~
- ~~IV. **Measures and Activities:** In order to reduce overflows, the Wastewater Collection System Management Plan must address the elements listed below that are appropriate and applicable to the Discharger's system and identify the person or position in the organization responsible for each element.~~
- ~~A. Provide adequate operation and maintenance of facilities and equipment.~~
  - ~~B. Maintain an up-to-date map of the collection system showing all gravity line segments and manholes, pumping facilities, pressure pipes and valves, and storm water conveyance facilities.~~
  - ~~C. Maintain relevant information to establish and prioritize appropriate Wastewater Collection System Management Plan activities (such as the immediate elimination of dry weather overflows or overflows into sensitive waters, such as public drinking water supplies and their source waters, swimming beaches and waters where swimming occurs, shellfish growing areas, waters within~~



~~Federal, State, or local parks, and water containing threatened or endangered species or their habitats), and identify and illustrate trends in overflows, such as frequency and volume.~~

~~D. Routine preventive operation and maintenance activities by staff and contractors, including a system for scheduling regular maintenance and cleaning of the collection system with more frequent cleaning and maintenance targeted at known problem areas as well as a tracking system for work orders.~~

~~E. Identify and prioritize structural deficiencies and implement short term and long term rehabilitation actions to address each deficiency. This shall include a rehabilitation plan including schedules for the entire system. As with the preventative maintenance program, sewer rehabilitation and replacement is crucial for the prevention of spills. Among the provisions that should be specified in this section is the need to direct rehabilitation and replacement of sewer pipes which are at risk of collapse or prone to more frequent blockages due to pipe defects. The plan should also include regular visual and video inspection of sewer pipes and a system for assessing and ranking the condition of sewer pipes. Finally, the rehabilitation and replacement plan should include a financial plan that properly manages and protects the infrastructure assets. The actions outlined above shall be coordinated with the requirements for Infiltration/Inflow and Spill Prevention contained in Order Section VI.C.1.b, *Wastewater Collection System Requirements*.~~

~~F. Provide training on a regular basis for staff in collection system operations, maintenance, and monitoring, and determine if contractors' staffs are appropriately trained (e.g., through performance standards in contracts, proper licensing, or other recognized means of demonstrating appropriate competency).~~

~~G. Provision of equipment and replacement parts inventories, including identification of critical replacement parts.~~

~~H. Establish an implementation plan and schedule for a public education outreach program that promotes proper disposal of grease and fats.~~

~~I. Establish a plan for responding to overflows from private property that discharge to public right of ways and storm drains, to prevent discharges from overflows to surface waters and storm drains, to the extent the District has jurisdiction to do so. For example, where the District has no jurisdiction over the public right of way or storm drain toward which an overflow is migrating or to which it is discharging, the plan may consist of reporting overflows to the appropriate authority for corrective action, directing property owners to the appropriate authorities, and advising property owners of the need to hire a private plumber.~~

~~J. Develop a plan and a schedule for providing an analysis of alternative methods of disposal for grease and fats, and an implementation plan and schedule for providing adequate disposal capacity for grease and fats generated within the wastewater collection system service area. For example, this plan may include an evaluation of the feasibility of using sludge digesters at the Treatment Facility for grease disposal and treatment, recycling, rendering, and other disposal alternatives.~~

~~K. Describe fiscal resources necessary to ensure system operation, including fee structure, fiscal resources, actual and projected five year budget expenses for staffing, operation, capital improvement projects, and reserves.~~

~~L. Describe staffing available to ensure system operation (identifying individuals and titles) including developing, implementing, and revising the Wastewater Collection System Management Plan. Include an organizational chart, duties, and training frequency.~~

~~V. Design and Performance Provisions~~

- ~~A. Develop and/or adopt design and construction standards and specifications for the installation of new sewer systems, pump stations, and other appurtenances; and for rehabilitation and repair of existing sewer systems; and~~
- ~~B. Develop and/or adopt procedures and standards for inspecting and testing the installation of new sewers, pumps, and other appurtenances, and for rehabilitation and repair projects.~~

~~VI. Monitoring, Measurement, and Plan Modifications~~

- ~~A. Monitor the implementation and, where appropriate, measure the effectiveness of each element of the Wastewater Collection System Management Plan;~~
- ~~B. Update program elements, as appropriate, based on monitoring or performance evaluations; and~~
- ~~C. Modify the Wastewater Collection System Management Plan program, as appropriate, to keep it updated and accurate and available for audit at all times.~~

~~VII. Overflow Emergency Response Plan: The Discharger shall develop and implement an Overflow Emergency Response Plan that identifies measures to protect public health and the environment. At a minimum, this plan should provide for the following actions:~~

- ~~A. Ensure proper notification procedures so that the primary responders are informed of all overflows in a timely manner (to the greatest extent possible).~~
- ~~B. Ensure that all overflows are appropriately responded to, including ensuring that reports of overflows are immediately dispatched to appropriate personnel for investigation and appropriate response.~~
- ~~C. Ensure immediate notification of health agencies and other impacted entities (e.g., water suppliers) of all overflows. The plan should provide for the reporting of overflows to the Central Coast Water Board, Santa Barbara County Health Department, the District, and the State Office of Emergency Services (OES) in accordance with each agency's policy. The Wastewater Collection System Management Plan should identify the public health agency and other officials who will receive immediate notification.~~
- ~~D. Ensure that appropriate staff and contractor personnel are aware of and follow the plan, and are appropriately trained.~~
- ~~E. Provide emergency operations, such as traffic and crowd control, and other necessary emergency response.~~
- ~~F. Take all reasonable steps to contain sewage, prevent sewage discharges to surface waters, and minimize or correct any adverse impact on the environment resulting from the overflows, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the discharge.~~
- ~~G. Develop and implement a plan to respond in a timely manner to spills and other emergencies. Collection system staff should be able to initiate a response to a sewage spill in less than an hour from the first call. The Discharger should be capable of meeting this response time day or night.~~

~~every day of the week. The Discharger must own or have ready access to spill and emergency response equipment such as vacuum trucks, hydroflushers, pumps, temporary bypass hoses, and portable generators of adequate number and capacity to operate pump stations.~~

~~H. Describe offsite and onsite alarm systems, response times, and methods for detecting spills from the system;~~

~~VIII. Source Control Program: Prepare and implement a grease, fat, and oil source control program to reduce the amount of these substances discharged to the wastewater collection system. This plan shall include the legal authority to prohibit discharges to the system and identify measures to prevent overflows caused by fat, oil, and grease blockages of sewers. The elements of an effective grease control program may include requirements to install grease removal devices (such as traps or, preferably, interceptors), design standards for the removal devices, maintenance requirements, Best Management Practices (BMP) requirements, record keeping, and reporting requirements. An effective grease control program must also include authority to inspect grease producing facilities, enforcement authorities, and sufficient staff to inspect and enforce the grease ordinance.~~

~~A. The grease control program shall identify sections of the wastewater collection system subject to grease blockages and establish a cleaning maintenance schedule for each section; and;~~

~~B. The program shall develop and implement source control measures, for all sources of grease and fats discharged to the wastewater collection system, for each section identified in (A) above.~~

~~IX. System Evaluation and Capacity Assurance Plan: Prepare and implement a capital improvement plan that will provide hydraulic capacity of key wastewater collection system elements under peak flow conditions. At a minimum, the plan must include:~~

~~A. System Evaluation—Evaluate current capacity of the wastewater collection system, including any existing diversions of urban runoff to the collection system and those portions of the collection system which are experiencing or contributing to an overflow discharge caused by hydraulic deficiency. The evaluation must provide estimates of peak flows (including flows from overflows that escape from the system) associated with conditions similar to those causing overflow events, estimates of the capacity of key system components, hydraulic deficiencies (including components of the system with limiting capacity), and the major sources that contribute to the peak flows associated with overflow events;~~

~~B. Capacity Enhancement Measures—Establish a short and long term capital improvement program to address deficiencies including prioritization, alternatives analysis, schedules, diversions of urban runoff to the wastewater collection system during dry weather periods, and control of infiltration and inflow during both wet weather events and dry weather periods; and~~

~~C. Plan Updates—At a minimum, the plan must be updated annually to describe any significant change in proposed actions and/or implementation schedules. The updates should include available information on the performance of measures that have been implemented.~~

~~X. Annual Plan Updates: As part of the Wastewater Collection System Management Plan, the Discharger shall conduct an internal audit, appropriate to the size of the system and the number of overflows, and submit a report of such audit (in conjunction with the annual report specified in the MRP), evaluating the Wastewater Collection System Management Plan and its compliance with this subsection, including its deficiencies and steps to correct them.~~

~~XI. Time Schedule / Communications: The Discharger should communicate at least annually with interested parties such as the Central Coast Water Board and the Santa Barbara County Health Department, on the implementation and performance of its Wastewater Collection System Management Plan. The communication system should allow interested parties to provide input to the Discharger as the program is developed and implemented. The Discharger shall develop and implement the Wastewater Collection System Management Plan according to the following schedule:~~

**MANAGEMENT PLAN DEVELOPMENT SCHEDULE**

<b>Task</b>	<b>Completion Date</b>
Legal Authority (Part III)	October 21, 2006
Measures and Activities (Part IV)	October 21, 2006
Overflow Emergency Response Plan (Part VII)	October 21, 2006
Design and Performance Provisions (Part V)	February 1, 2007
Capacity Evaluation (Part IX)	February 1, 2007
Source Control Program (Part VIII)	October 21, 2007
Final Wastewater Collection System Management Plan	October 21, 2007