



**City of Santa Barbara**  
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March 2, 2010

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Mr. Roger Briggs, Executive Officer  
Regional Water Quality Control Board  
Central Coast Region  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

**SUBJECT: COMMENTS ON THE DRAFT WASTE DISCHARGE REQUIREMENTS ORDER NO. R3-2010-0011, NPDES PERMIT NO. CA0048143 – CITY OF SANTA BARBARA EL ESTERO WASTEWATER TREATMENT FACILITY, SANTA BARBARA COUNTY WDID 3 420108001**

Dear Mr. Briggs:

The City of Santa Barbara (City) is pleased to have an opportunity to submit comments on the draft Waste Discharge Requirements Order No. R3-2010-0011 (Order). We have reviewed the Order and have discussed some of our concerns with Ryan Lodge, RWQCB Case Worker on February 24, 2010. As a result of our review, we have a number of comments and revisions requested for inclusion in the final WDR Order.

The City requests that if the RWQCB revises the Draft Order, a copy of the "as published" Order will be provided to the City for review. If the City has any additional comments, they will be addressed at the public hearing at the Central Coast Water Quality Control Board on Thursday, May 13, 2010.

The City shares the Regional Water Quality Control Board's (RWQCB) goal of limiting pollution to the maximum extent possible. However, the City is cognizant of the fact that an Order is a legal document, and therefore, exposes the City and its rate payers to liability for failure to comply with all permit requirements. Therefore, the City is compelled to ensure that the Order does not unduly subject City rate payers to unreasonable limits or requirements. Because the City believes there is value in the public process associated with the development of regulations and policies, the City also objects to the inclusion of limits or requirements that are not based on current laws, regulations, or adopted plans.

Item No. 21 Attachment No. 2  
El Estero WWTP  
May 12-13, 2010 Meeting

## GENERAL COMMENTS

1. The RWQCB has established two new Effluent Monitoring Locations in the proposed Monitoring and Reporting Program (MRP) as compared to the existing permit. One of the locations refers to a location EFF-001A, where the secondary effluent can be collected after treatment and chlorination/dechlorination and prior to commingling with any other waste streams (i.e., desalination brine discharge). The other location, EFF-001B, refers to a location where final effluent (secondary effluent and desalination brine) is discharged. Currently, the City has only one monitoring location where an effluent sample can be collected, which is where the final effluent is discharged. Since the City's desalination facility is not in operation and is not planned to become operational in the near-term, we do not believe that there is a need for the draft Order to require two effluent monitoring locations. Should the City decide to put the desalination facility into operation, the City will include in its Capital Improvement Program (CIP) engineering plans, an appropriate monitoring location where secondary effluent can be sampled after treatment and chlorination/dechlorination and prior to commingling with desalination brine (i.e., EFF-001A). We understand that the RWQCB's staff will review and approve any further new sampling locations proposed in prospective CIP plans involving the City's desalination facility.

2. Because the City's desalination plant is currently not in operation, effluent monitoring locations EFF-001A and EFF-001B are the same location. The City requests that the monitoring requirements for the two locations be combined as it is in the existing Order.

3. The Monitoring and Reporting program requires that flow composite influent samples be collected at the influent to the treatment plant. Unfortunately the El Estero Treatment Plant was designed without an influent sampling point. The wastewater enters the treatment plant through three separate lines. None of these provides a good place for collecting a representative composite sample, and these three locations are not metered. The City has reported to the RWQCB that influent sampling is not feasible, and has been allowed to monitor plant influent using a confluent stream within the wastewater treatment plant itself. This confluent stream is composed primarily of influent, but it also includes plant return flows. A confluent stream sampler is set up immediately following the headworks screening area and collects flow proportional samples there. The confluent stream is representative of the waste-stream entering the headworks of the plant and all the treatment processes.

The cost of installing three separate influent metering stations is prohibitively high. The influent lines are not technically suited to provide accurate flow measurement. The City currently provides calculated influent flow data under its existing Order. The City again has proposed to provide calculated influent data in the draft Order by subtracting confluent flow and pollutant loads from the total incoming flow to arrive at representative calculated influent flow and pollutant parameters. The City believes that influent data derived from the existing confluent sampling location is superior, even with calculated data, to any upstream sampling locations that could be installed in the influent lines.

4. As a general remark on the labeling of the data tables throughout the draft Order, the City requests the title of each table be included on subsequent pages, should they extend beyond a single page. This labeling improvement will allow a reader to know what the data table was illustrating without having to refer to the beginning of the data table.

## **SPECIFIC COMMENTS**

### **Limitations and Discharge Requirements**

#### I. Facility Information

Pg. 5, Table 4. The facility contact employee is Mr. Todd Heldoom, Wastewater Treatment Superintendent, (805) 568-1003 or (805) 568-1010.

#### III. Discharge Prohibitions

Pg. 11, III. F.: Specifies that the bypass from the Discharger's collection, treatment or disposal facilities is prohibited except as provided for in Attachment D, Standard Provision I. A.7 (Bypass). This is confusing as there is no section labeled I. A.7 in the Standard Provisions.

#### IV. Effluent Limitations and Discharge Specifications

As discussed above, there is some general confusion regarding the Effluent monitoring locations. This Order states that there are two monitoring locations labeled EFF-001A and EFF-001B. There is only one location from which the samples are collected for Effluent monitoring. The City requests that the Monitoring Locations EFF-001A and EFF-001B be combined. The permit could indicate that a second location is required when the desalination plant is in use, but when the desalination plant is non-operable the single location is fine for all samples.

Under Tables 7 and 8, pH cites 40 CFR § 410.17 which states "pH effluent limitations under continuous monitoring". As is stated in the MRP of this Order, the discharger performs pH as a grab sample on effluent. It is also impossible for the discharger to obtain continuous monitoring data, because there is not a pH analyzer at the effluent monitoring location. Thus, the City requests that Tables 7 and 8 include an additional footnote stating that pH samples are grab samples and not reflective of continuous monitoring.

Pg. 20, IV. C.: The City requests that the current Waste Discharge Requirements and Master Reclamation Permit Order No. 97-44 be included in this section.

#### VI. Provisions

Pg. 24, VI. C.2.a.: As currently drafted, the language regarding when to conduct a TRE is inconsistent. The City requests the following sentence be added to the first paragraph. "The Executive Officer (EO) will determine when to implement a TRE."

Pg. 28, VI. C.5.b.: The City requests that the due date for the Pretreatment Annual Report be changed from January 31 to March 31<sup>st</sup> as it is currently stated

in the existing Order. Requiring a report to be submitted January 31 does not allow sufficient time to finalize data for samples collected in December.

## **Attachment D – Standard Provisions**

### I. Central Coast General Permit Conditions

Pg. D-15, I. D.8.: The City requests that the due date for the Annual Report be changed from January 30<sup>th</sup> of each year to March 31<sup>st</sup> as it is currently stated in the existing discharge permit. The later date is requested because data from the quarterly sampling event in December isn't generally available until February.

## **Attachment E – Monitoring and Reporting Program**

### Table of Contents

The Table of Contents is not consistent with the headings of the document. The table of contents lists Receiving Water Requirements – Surface Water and Groundwater on Pg. E-11. This heading does not appear in the MRP but a heading of Receiving Water Requirements – Surface Water appears on Pg. E-12. The title in the table of contents should be changed to match the document and the corresponding page number.

### II. Monitoring Locations

Table E-1 gives monitoring location descriptions for EFF-001A and EFF-001B. Due to the general confusion of where these locations are, the City requests the following be added to location EFF-001A description: (Only when the desalination plant is operating.)

### III. Influent Monitoring Requirements

Table E-2 describes the parameters for Influent Monitoring. As stated previously, the plant was designed without an influent sampling point and thus the City has been allowed to monitor plant influent using the confluent. The City requests that a footnote be added to the parameters Flow and pH stating "Due to the design of the plant, pH and flow are monitored at the confluent location. Confluent is set up after the headworks and is primarily composed of influent but also includes plant return flows."

Table E-2 requires Flow to be monitored on influent location INF-001. As it states in the existing permit the discharger reports daily average flow, daily maximum flow, mean daily flow for the month and maximum daily flow for the month. The City requests the footnote be reworded as follows: "The Discharger shall report the daily average and the daily maximum flow for each day. In addition, the Discharger shall report the mean daily flow for each month and the maximum daily flow for each month."

### IV. Effluent Monitoring Requirements

Pg. E-5, IV. A.1.: This paragraph discusses when and where the effluent monitoring should occur when the desalination plant is in operation. The City suggests this section should also include a discussion about what to do if the desalination plant is not operating, which would make the monitoring location EFF-001A obsolete. The City suggests the following paragraph should be added

and labeled as IV. A.2.: If the Dischargers desalination plant is not in operation, monitoring location EFF-001B may be used to satisfy the parameters stated in Table E-3. Consequently, if parameters are duplicated as a result of this, but with differing monitoring frequencies, the more frequent sampling schedule shall be used. Thus monitoring location EFF-001B would be used to satisfy all effluent monitoring requirements when the desalination plant is not in operation.

Table E-3 requires Daily Flow to be monitored at effluent location EFF-001A, however it doesn't have any indication of the type of flow as is stated in the existing permit. The City requests that an additional footnote be added to the Daily Flow parameter stating the following: "The Discharger shall report the daily average and the daily maximum flow for each day. In addition, the Discharger shall report the mean daily flow for each month and the maximum daily flow for each month."

Table E-4 requires Daily Flow to be monitored at effluent location EFF-001B, however it doesn't have any indication of the type of flow as is stated in the existing permit. The City requests that an additional footnote be added to the Daily Flow parameter stating the following: "The Discharger shall report the daily average and the daily maximum flow for each day. In addition, the Discharger shall report the mean daily flow for each month and the maximum daily flow for each month."

#### V. Whole Effluent Toxicity Testing Requirements

Pg. E-9, V. B. ¶6.: The language regarding reduction of monitoring to most sensitive species is a bit confusing. The City proposes the following change: After a screening period of no fewer than three sampling events, monitoring can be reduced to the most sensitive species.

#### VIII. Receiving Water Monitoring Requirements – Surface Water

Pg. E-12, VIII. A.: The draft Order requires that staff observe the water at the shoreline on a weekly and monthly basis. In the current permit, the requirement for shoreline monitoring is only required after three consecutive violations of the Coliform standard. The way the draft Order is worded, this requirement is not linked to discharge violation. The City does not believe that this requirement should be in place in the absence of any preceding water quality violation. There is little to no linkage in water quality appearance at the shoreline, and the wastewater outfall on a day to day basis. The outfall is located over a mile-and-a-half off-shore. Not only is this labor intensive and cost prohibitive, but it would remove plant staff from their assigned duties causing an unnecessary deficiency in personnel. The City does recognize the value of these observations in the event of effluent coliform violations as they may offer information about the source of potentially elevated coliform at the shoreline. Therefore, the City requests that the permit be revised to require shoreline observations only in the event of effluent violations. We propose the following: If three consecutive violations of the effluent total and/or fecal coliform bacteria tests, in any combination occurs, the weekly and monthly visual observations of the receiving water stations RSW-A thru RSW-H will be implemented at the time of the violation and continue until the coliform tests return to normal.

Pg. E-13, VIII. B. & C.: The City requests that the permit be revised to give the Executive Officer the ability to allow the City to participate in regional monitoring in conjunction with other agencies, such as the Southern California Coastal Water Research Project (SCCWRP), as an alternative to the Benthic Sediment and Biota Monitoring and Chemical Analysis of Biota. City staff believes that participation in a more regional program will provide better scientific information about the potential for impacts to the marine environment from wastewater discharges.

#### IX. Other Monitoring Requirements

Table E-9: The City requests that the parameter Moisture Content be changed to Percent Moisture as it is tested under the existing permit. Because moisture content and percent moisture are two different parameters, the City thinks it is unnecessary to change the parameter without justification of the change.

Table E-9, footnote 2 states that the Priority Pollutants are identified under section IX. B of this MRP. Under Section IX. B, the priority pollutants are said to be identified under section 307(a) of the Clean Water Act. The City requests that the footnote be changed to avoid this double reference. Footnote 2 should be worded as follows: "As identified under section 307(a) of the Clean Water Act."

### **Attachment F – Fact Sheet**

#### II. Facility Description

Pg. F-5, II. A.¶3.: Dewatered biosolids are transported and composted not directly land-applied.

Table F-3: The table states that historical data was monitored from October 2004 – April 2009. However the RWQCB staff only requested data for acute toxicity, chronic toxicity, phenolics compounds (non-chlorinated) and chlorinated phenolics for 2008, which is what was provided. Samples with higher values were collected during the 2004-2009 period. The City requests that a footnote be added to the table stating these four parameters had historical data obtained from 2008 only.

#### IV. Rationale for Effluent Limitations and Discharge Specifications

Pg. F-18, IV. C.3.: states that the procedures for performing an RPA are described in section III.C., however, there is no discussion of the RPA in section III.C. It is assumed the language refers to Attachment F section IV. C.1. The City requests at the reference be corrected.

Tables F-9 and F-10 have a notation footnote #4 attached to the Rationale heading of each table. However, there is no footnote # provided. The City requests that either the footnote 4 explanation be included in the table or the footnote notation be removed.

Pg. F-43, V. A.: This paragraph indicates that the receiving water limitations for bacteria have been modified from the previous Order. The limitations are in fact the same, however the sampling frequency has changed. The City suggests the wording be modified to reflect this.

Pg. F-44. V. D.1.: This section describes the reasoning for the requirements of surface water monitoring. It states that the visual observations of the receiving water have been carried over from the Order No. R3-2004-0122, we believe is the intent of the RWQCB, however as currently written, this monitoring would be an additional requirement. This paragraph also states that the shoreline bacteria tests are a new addition to the draft Order, however shoreline bacteria monitoring was conditionally required in the existing Order. As discussed above, the City requests that the shoreline observation requirements be required only when there have been preceding violations. This paragraph should then be reworded to correctly state how the draft Order has or has not changed from the existing Order. It is the City's recommendation that the requirement not change from the existing Order.

Thank you very much for considering these comments submitted by the City of Santa Barbara. Please feel free to contact me at (805) 564-5412, if you have any questions about these comments or if there are any sections that need further clarification.

Sincerely,



Christopher Toth  
Wastewater System Manager  
City of Santa Barbara

GF/gf

Attachments: 1. El Estero WWTP Draft w/ Suggested Revisions

cc: (w/o attachments)

Christine Anderson, Public Works Director  
Rebecca Bjork, Water Resources Manager  
Todd Heldoorn, Wastewater Treatment Plant Superintendent  
David McDermott, Assistant City Attorney