

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

STAFF SUMMARY REPORT (Vincent Christian)
MEETING DATE: June 13, 2012

ITEM: 6

SUBJECT: **Central Marin Sanitation Agency, Wastewater Treatment Plant and Collection System, San Rafael, Marin County** – Reissuance of NPDES Permit

CHRONOLOGY: January 2007 – NPDES Permit Reissued

DISCUSSION: The Revised Tentative Order (Appendix A) would reissue the NPDES permit for Central Marin Sanitation Agency, which owns and operates a 10 million-gallon-per-day wastewater treatment plant serving San Rafael and nearby areas. The Sanitation Agency, U.S. EPA, and the San Francisco Baykeeper submitted comments (Appendix B) on a tentative order distributed for public review. We prepared responses (Appendix C) to the comments and revised the tentative order as appropriate.

Perhaps the most challenging issue raised relates to wet weather blending. Blending occurs when a portion of primary-treated effluent is routed around secondary treatment units during peak wet weather flows and is “blended” with secondary-treated effluent prior to disinfection and discharge. Blended discharges must meet all discharge limits. Historically, the Sanitation Agency routes about 4 percent of its primary-treated effluent around secondary treatment. Because spikes in collection system inflow and infiltration during wet weather cause the blending, U.S. EPA and Baykeeper would like more focus on improving satellite collection system performance.

We agree in principle; however, the Revised Tentative Order is specific to the Sanitation Agency’s discharge, not those of the satellite collection agencies it does not control. We think the Revised Tentative Order goes as far as it legally can under these circumstances. Provisions in the Revised Tentative Order would require the Sanitation Agency to request operation and maintenance information from its satellites, report and evaluate that information, and work with the satellites to improve their performance. As a parallel effort, we will continue to seek inflow and infiltration reductions from the satellites as we oversee collection system agency compliance with the State Water Board’s *General Waste Discharge Requirements for Collection System Agencies*.

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Appendices: A. Revised Tentative Order
B. Comments
C. Response to Comments