

# Attachment 1

## Update to the City of Roseville Dry Creek Wastewater Treatment Plant (DCWWTP) Infeasibility Analyses

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### Introduction

This update to the DCWWTP Infeasibility Analyses (submitted to the Central Valley Regional Water Quality Control Board on March 17, 2008) provides revised compliance schedules for the constituents for which the City cannot immediately comply with final effluent limitations. These revised schedules are consistent with current regulatory guidance and reflect the earliest possible time frames for the City of Roseville (City) to meet the final limits.

This update includes only the summary section of the original DCWWTP Infeasibility Analyses that addresses compliance schedule needs for the City. All other technical documentation in the original report, including the infeasibility justification remains valid.

### Summary

The evaluations contained in the DCWWTP Infeasibility Analyses (dated March 17, 2008) indicate that immediate compliance with proposed final effluent limits for the constituents listed in Table 3 are not feasible for the City. In accordance with the requirements of the State's *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California* (State Implementation Plan or SIP), the City requests that the Regional Board adopt appropriate interim effluent limitations and compliance schedules for these constituents.

The City will continue monitoring and/or implement the source control actions listed in Table 3 for the listed constituents as appropriate. The schedules in Table 3 are as short as practicable.

**Table 3. Proposed Source Control Actions**

Pollutant	Proposed Action	Estimated Time to Complete
Cadmium	Conduct Source Identification Study	1 year after permit effective date
	Implement source control program based on source identification and evaluate effectiveness in achieving compliance	2 years after permit effective date
	Prepare workplan for translator study	If compliance not achieved by source control, 2.5 years after permit effective date
	Conduct translator study and submit study report to Regional Board	2 years after submittal of workplan
	Prepare workplan for WER study	If compliance not achieved by source control, 2.5 years after permit effective date
	Conduct WER study and submit study report to Regional Board	2 years after submittal of workplan

<b>Pollutant</b>	<b>Proposed Action</b>	<b>Estimated Time to Complete</b>
Mercury	Follow-up source identification study	1 year after permit effective date
	Survey dental offices about mercury amalgam disposal techniques	2 year after permit effective date
	Develop educational program for dentists regarding amalgam disposal techniques	3 years after permit effective date
	Develop mercury thermometer drop-off or exchange program	3 years after permit effective date
	Fully implement dental source control and mercury thermometer programs	5 years after permit effective date
Zinc	Conduct Source Identification Study	1 year after permit effective date
	Implement source control program based on source identification and evaluate effectiveness in achieving compliance	2 years after permit effective date
	Prepare workplan for translator study	If compliance not achieved by source control, 2.5 years after permit effective date
	Conduct translator study and submit study report to Regional Board	2 years after submittal of workplan
	Prepare workplan for WER study	If compliance not achieved by source control, 2.5 years after permit effective date
Cyanide	Conduct WER study and submit study report to Regional Board	2 years after submittal of workplan
	Switch to UV disinfection	May 18, 2010
	UV system fully evaluated	May 31, 2011
	Get laboratory certification to analyze using new, improved method for low cyanide levels	Application process currently in progress
	Conduct a source identification study	1 year from full evaluation of UV disinfection and new analytical methods will not result in compliance
Carbon Tetrachloride	Implement source control program for identified sources	1 years after completion of source identification study
	Switch to UV disinfection	May 18, 2010
Dibromochloromethane	UV system fully evaluated	May 31, 2011
	Switch to UV disinfection	May 18, 2010
Dichlorobromomethane	UV system fully evaluated	May 31, 2011
	Switch to UV disinfection	May 18, 2010

## Compliance Schedules Requested

The City requests compliance schedules for the constituents discussed above as follows:

- **Cadmium and zinc.** The City requests a 5-year compliance schedule for these constituents based on the justifications presented in the DCWWTP Infeasibility Analyses (March 17, 2008). The City requests the approximate initial 2 years (i.e., through May 18, 2010) in the permit. Because the in-permit compliance schedule will not provide adequate to time to ensure compliance with the final effluent limits for these constituents, the City also requests that the Regional Board adopt a Time Schedule Order now that would run concurrently with the permit. The Time Schedule Order should be effective upon permit adoption and provide the City protection from mandatory minimum penalties through May 31, 2013. In essence, this will provide for 3 additional years beyond the time allowed in the permit for compliance with CTR constituents. As described in Table 3, the City is requesting this time schedule order to evaluate source control options and to conduct studies to develop a site-specific translator and/or a WER as needed.
- **Carbon tetrachloride, dibromochloromethane, and dichlorobromomethane.** The City requests that the Regional Board include a compliance schedule for these constituents in the permit through May 18, 2010 based on the justifications presented in the DCWWTP Infeasibility Analyses (March 17, 2008). Because the in-permit compliance schedule will not provide adequate to time to ensure compliance with the final effluent limits for these constituents, the City also requests that the Regional Board adopt a Time Schedule Order now that would run concurrently with the permit. The Time Schedule Order should be effective upon permit adoption and provide the City protection from mandatory minimum penalties through May 31, 2011. In essence, this will provide for 1 additional year beyond the time allowed in the permit for compliance with CTR constituents.
- **Mercury and cyanide.** The City requests a 5-year compliance schedule for these constituent based on the justifications presented in the DCWWTP Infeasibility Analyses (March 17, 2008). The City requests that the Regional Board include a compliance schedule in the permit through May 18, 2010. Because the in-permit compliance schedule may not provide adequate to time to ensure compliance with the final effluent limits for these constituents, the City also requests that the Regional Board adopt a Time Schedule Order now that would run concurrently with the permit. The Time Schedule Order should be effective upon adoption of this permit and provide the City protection from mandatory minimum penalties through May 31, 2013. In essence, this will provide for 3 additional years beyond the time allowed in the permit for compliance with CTR constituents.