

Attachment 1

Update to the City of Roseville Pleasant Grove Wastewater Treatment Plant (PGWWTP) Infeasibility Analyses

Introduction

This update to the PGWWTP Infeasibility Analyses (submitted to the Central Valley Regional Water Quality Control Board on March 19, 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 PGWWTP 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 PGWWTP Infeasibility Analyses (dated March 19, 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 implementing 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

Pollutant	Proposed Action	Estimated Time to Complete
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
	Conduct WER study and submit study report to Regional Board	2 years after submittal of workplan
Cyanide	Switch to UV disinfection	December 31, 2011
	UV system fully evaluated	December 31, 2012
	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
	Implement source control program for identified sources	1 years after completion of source identification study
Dibromochloromethane	Switch to UV disinfection	December 31, 2011
	UV system fully evaluated	December 31, 2012
Dichlorobromomethane	Switch to UV disinfection	December 31, 2011
	UV system fully evaluated	December 31, 2012
Fluoride	Develop fluoride local limit according to EPA guidance and issue amended industrial waste permit to NEC	5 years after permit effective date

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 PGWWTP Infeasibility Analyses (March 19, 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.

- **Cyanide.** The City requests a 5-year compliance schedule for cyanide based on the justifications presented in the PGWWTP Infeasibility Analyses (March 19, 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 will not provide adequate to time to ensure compliance with the final effluent limits for this constituent, 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.
- **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 PGWWTP Infeasibility Analyses (March 19, 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 December 31, 2012. In essence, this will provide for 2.5 additional years beyond the time allowed in the permit for compliance with CTR constituents.
- **Fluoride.** The City requests a 5-year compliance schedule for this constituent based on the justifications presented in the PGWWTP Infeasibility Analyses (March 19, 2008). NEC is in the process of modifying its wafer production process. Because the modification may impact its waste streams, this needs to be completed before NEC evaluates and modifies its pretreatment processes. At the same time, the City needs to develop and adopt a new local limit for fluoride and reissue NEC's permit. To allow NEC time to modify its production and treatment processes and to allow the City time to develop and adopt a local limit and reissue NEC's Pretreatment Permit, the City requests that the Regional Board adopt a Time Schedule Order containing a 5 year compliance schedule. The Time Schedule Order would be effective upon permit adoption and provide the City protection from mandatory minimum penalties through May 31, 2013.