

ITEM: 19

SUBJECT: Cutler-Orosi Joint Powers Wastewater Authority, Wastewater Treatment Facility, Tulare County

BOARD ACTION: *Consideration of renewal of Waste Discharge Requirements (WDRs)/National Pollutant Discharge Elimination System (NPDES) Permit (NPDES No. CA0081485) and Time Schedule Order.*

BACKGROUND: The Cutler-Orosi Joint Powers Wastewater Authority (Authority) owns and operates a wastewater treatment facility (WWTF) serving the communities of Cutler, Orosi, East Orosi, Yettem, Seville, and Sultana. The WWTF consist of raw wastewater screening units, trickling filters, clarifiers, an oxidation ditch, and and an ultraviolet light disinfection system. The WWTF has a design treatment capacity of 2.0 million gallons per day (mgd) and the proposed WDRs/NPDES permit allows for discharge up to 2.0 mgd to Sand Creek consistent with the Authority's current permit. However, for the Authority's discharge to land, the proposed WDRs/NPDES permit includes an effluent flow limitation of 1.5 mgd because the Authority submitted a water and nitrogen balance in 2009 indicating sufficient land was only available for discharge up to 1.5 mgd (while also accounting for a 100-year, annual rainfall event). The proposed WDRs/NPDES permit does allow the Authority to discharge up to 2.0 mgd to land if it demonstrates it has sufficient disposal capacity.

The WWTF primarily discharges undisinfected secondary treated domestic wastewater to cropland. The Authority is required to disinfect the secondary treated domestic wastewater with ultraviolet light when: (1) discharge occurs to the unlined treated wastewater storage ponds and groundwater is within five feet of the bottom of the ponds; (2) discharge occurs to cropland and groundwater is within five feet of ground surface of that cropland; and (3) anytime discharge occurs to Sand Creek. Cropland where wastewater is applied is owned by the Authority and the Authority is responsible for wastewater application; however, planting and harvest of the crops is contracted to a local farmer. Discharge to Sand Creek is only permitted between 1 November and 30 April of each year. However, discharge to Sand Creek has not occurred since March 2001.

WDRs Order R5-2006-0092 (NPDES No. CA0081485) currently regulates the discharge from the WWTF. The proposed WDRs/NPDES permit includes final effluent limitations similar to the existing permit and a new final effluent limitation for total recoverable copper. A Time Schedule Order is also proposed to allow the Authority time to come into compliance with the new copper effluent limitation.

**ISSUES:** Comments on the proposed WDRs/NPDES permit were received from the Central Valley Clean Water Association (CVCWA) and on behalf of the Authority, Keller-Wegley Consulting Engineers.

CVCWA's comments were with respect to: (1) prohibiting the discharge of "designated" waste was redundant; (2) effluent limitations and recycled water specifications for chloride and boron should not be applied as maximum daily limitations, but should instead be applied as long term averages; (3) the receiving water limitation identified as "other" was too broad and not appropriate. Keller-Wegley's main comments were that the buffer zones required by the recycled water specifications are too stringent and not in accordance with Title 22 of the California Code of Regulations.

The tentative WDRs/NPDES permit has been revised to address many of the comments; however, for reasons specific to this discharge and permit circumstances, Central Valley Water Board staff does not concur with applying the chloride and boron effluent limitations and recycled water specifications as long term averages. In addition, the buffer zones in the tentative WDRs/NPDES permit have been revised to be consistent with what is listed in the Authority's Title 22 Engineering Report. Upon (1) a request by the Discharger to modify the buffer zones and (2) approval by the California Department of Public Health, this Order may be reopened and modified at a future Central Valley Water Board meeting.

**RECOMMENDATION:** Adopt the proposed WDRs/NPDES permit and Time Schedule Order.

30/31 May 2013 Meeting  
Central Valley Regional Water Quality Control Board meeting  
11020 Sun Center Dr. #200  
Rancho Cordova, CA 95670