

ITEM: 20

SUBJECT: Sacramento Regional County Sanitation District, Sacramento Regional Wastewater Treatment Plant, Sacramento County

BOARD ACTION: *Consideration of Order Amending Waste Discharge Requirements Order R5-2010-0114-01 and Time Schedule Order R5-2010-0115-01 (NPDES Permit No. CA0077682)*

BACKGROUND: Sacramento Regional County Sanitation District (Discharger) owns and operates the Sacramento Regional Wastewater Treatment Plant (Facility). The Discharger provides wastewater treatment service to the Cities of Sacramento, Folsom, West Sacramento, and the Sacramento Area Sewer District. The Sacramento Area Sewer District service area includes the Cities of Elk Grove, Rancho Cordova, Citrus Heights, and portions of the unincorporated areas of Sacramento County. The population served is approximately 1.3 million people. The Facility is permitted to discharge 181 million gallons per day of treated wastewater to the Sacramento River within the Sacramento-San Joaquin Delta.

On 9 December 2010, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) adopted Waste Discharge Requirements Order R5-2010-0114 and Time Schedule Order (TSO) R5-2010-0115 which were subsequently amended on 1 December 2011, prescribing waste discharge requirements for the Facility. An order is proposed, in part, to modify the Monitoring and Reporting Program, modify the effluent limitations for dichlorobromomethane (DCBM) and chlorodibromomethane (CDBM), and remove the effluent limitations for N-nitrosodimethylamine (NDMA) in the NPDES Permit. The proposed Order also removes the compliance schedule and interim effluent limits for NDMA in the TSO.

ISSUES: Public comments on the proposed amendment were received from the Discharger, California Sportfishing Protection Alliance (CSPA), USEPA, California Urban Water Agencies (CUWA), and the Water Agencies. All public comments and Central Valley Water Board staff responses are included in the Staff Response to Comments document included in the agenda package. The following are the major issues and Central Valley Water Board staff responses.

Minor comments were submitted by all agencies except CSPA. CSPA contends (1) the proposed amendment contains compliance schedules that are beyond those allowed by the Basin Plan and contrary to the California Water Code; (2) removal of the effluent limit for N-nitrodimethylamine (NDMA) is contrary to antibacksliding requirements, and (3) relaxing effluent limits for chlorodibromomethane (CDBM) and dichlorobromomethane (DCBM) are contrary to the antidegradation policy and Basin Plan requirements for mixing zones.

(1) **Compliance Schedules.** The compliance schedules for the ammonia effluent limits and tertiary treatment (i.e., effluent limits for biochemical oxygen demand and total suspended solids, and provisions for turbidity and filtration) were extended due to stays approved by the State Water Resource Control Board and the Sacramento County Superior Court. These stays are not subject to public comment but were added to the amendment for clarification.

(2) **NDMA.** Removal of the NDMA effluent limit meets the antibacksliding exception of the Clean Water Act (CWA), which allows a less stringent limit if information is newly available which was not available at the time of the permit issuance (CWA

Section 402(o)(2)(B)(i)). The original NDMA data used for the reasonable potential analysis (RPA) was based on ultra-low reporting levels and were found to be too variable and unreliable for consideration in the RPA. New NDMA data shows no reasonable potential therefore the NDMA effluent limit and time schedule are removed.

(3) **CDBM and DCBM.** Effluent limits for CDBM and DCBM, which are disinfection byproducts when chlorine is used, were based on current Facility performance and a human health mixing zone. An advanced treatment pilot plant was constructed to evaluate how best to meet new ammonia and nitrate limits, as well as, to evaluate tertiary treatment and disinfection processes. The Discharger found that liquid chlorine disinfection was the least cost alternative and resulted in the least environmental impacts. The continued use of chlorine and the removal of ammonia will result in higher concentrations of disinfection byproducts, including CDBM and DCBM. Therefore, the proposed amendment modifies the performance-based effluent limits for CDBM and DCBM based on the proposed future treatment system. The proposed increased effluent limits for CDBM and DCBM are more stringent than the limits allowable with the approved human health mixing zone, meets the antibacksliding exceptions of the CWA, and complies with the State Water Board's Antidegradation Policy (Resolution 68-16).

RECOMMENDATION Adopt Order amending NPDES permit and TSO

Mgmt. Review AWL

Legal Review \_\_\_\_\_

3/4 October 2013

11020 Sun Center Dr. #200

Rancho Cordova, CA 95670