

ITEM: 26

SUBJECT: City of Escalon, Escalon Wastewater Treatment Plant,
San Joaquin County

BOARD ACTION: *Consideration of a Cease and Desist Order (CDO)*

FACILITY
BACKGROUND:

The City of Escalon wastewater treatment plant (WWTP) treats domestic wastewater as well as industrial wastewater generated seasonally by two vegetable processors. Domestic and industrial wastewater flows are delivered to the plant in separate pipelines. The two waste streams remain separate and are treated, stored and disposed of in separate percolation and evaporation ponds. The treatment and discharge of waste is regulated by Waste Discharge Requirements (WDRs) Order 5-00-142, adopted by the Board on 16 June 2000.

Objectionable odor complaints related to the Escalon wastewater facility were documented during the food processing seasons in the years 2000, 2001, and 2003. The Board subsequently adopted Cease and Desist Order R5-2003-0124, which required the Discharger to evaluate and upgrade its treatment processes, as well as implement a pre-treatment program for the food processor. Improvements were made, the CDO was rescinded, and no odor complaints were received until this year.

In August 2014, Regional Board staff began receiving numerous complaints from residents in a subdivision adjacent to the Escalon WWTP. The San Joaquin Valley Unified Air Pollution Control District (Air District) has also received complaints from the individuals in the subdivision and has also conducted inspections. The Air District inspections resulted in a Notice of Violation being issued to the City of Escalon.

Regional Board staff inspected the WWTP on 17 September 2014. During the inspection staff observed several violations of the WDRs, the most serious of which was the lack of freeboard in all seven of the industrial percolation ponds and in all five of the domestic percolation ponds. Freeboard was generally between 2" and 6", in violation of the 24" limit in the WDRs. In addition, the failure to report the lack of freeboard is a violation of the WDRs. Influent flows into the WWTP are well below the permitted limit, and it is unknown what caused the City to have such a serious lack of capacity.

A review of monitoring reports shows that Escalon has failed to report freeboard levels for any of its 20 ponds since at least May 2013. The City also failed to monitor and report other required

constituents.

On 17 September 2014, the WWTP operator reported a discharge from an industrial wastewater treatment pond to the Stanislaus River. The discharge of wastewater to the Stanislaus River is a violation of the WDRs.

In response to staff's inspection, the City asked the food processors to discharge less waste, hauled some wastewater to the City of Manteca, implemented daily inspections of all ponds, and fixed many of the broken aerators. The City is also submitting daily freeboard measurement reports.

The proposed CDO addresses the violations of WDRs 5-00-142, and requires, among other items, that Escalon submit complete monitoring reports, install real-time odor monitors, implement actions to properly treat the industrial waste, determine why the industrial flows overwhelmed the capacity of the percolation ponds, and make upgrades prior to the 2015 food processing season. In addition, the City shall implement a contingency plan for managing influent flows, identify whether any of the pond berms need repairs, and complete a water balance.

RECOMMENDATION: The Prosecution Team recommends that the CDO be adopted as proposed.

Mgmt. Review WSW
Legal Review DB

4/5 December 2014 Meeting
Central Valley Regional Water Quality Control Board meeting
11020 Sun Center Dr. #200
Rancho Cordova, CA 95670