

**STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR SPECIAL MEETING OF NOVEMBER 19, 2004

Prepared on October 28, 2004

ITEM NUMBER: 5

SUBJECT: Issuance of Waste Discharge Requirements for Wastewater Collection Agencies Tributary to the Goleta Sanitary District Wastewater Treatment Facility, Santa Barbara County – Order No. R3-2004-0130

KEY INFORMATION

Permittees: Goleta West Sanitary District
University of California at Santa Barbara
Santa Barbara Municipal Airport
County of Santa Barbara

Location: Various locations in the vicinity of Goleta, Santa Barbara County

Discharge Type: Municipal Wastewater

Type of Waste: Municipal Wastewater

Discharge Capacity: Variable

Treatment: None

Disposal: Permittee-owned wastewater collection systems discharge to Goleta Sanitary District Wastewater Treatment Facility

Reclamation: N/A

Existing Order: National Pollutant Discharge Elimination System Permit CA0048160 - Waste Discharge Requirements Order No. 96-21

SUMMARY

Historically, throughout the Central Coast Region, requirements pertaining to wastewater collection systems have been incorporated into Waste Discharge Requirements (WDR) for the treatment facility to which those collection systems are tributary. However, in recognition of the different discharge specifications, monitoring requirements, and responsible agencies involved in the tributary wastewater collection systems and the treatment facility, staff proposes to regulate the wastewater collection agencies using WDRs separate from the treatment facility permit.

Proposed WDR Order No. R3-2004-0130 is intended to regulate local wastewater collection agencies with collection systems tributary to the Goleta Sanitary District Wastewater Treatment Facility (Treatment Facility). Currently, those tributary collection agencies include Goleta West

Sanitary District, the University of California at Santa Barbara, the Santa Barbara Municipal Airport, and the County of Santa Barbara (jointly referred to as Permittees). The Treatment Facility is owned and operated by the Goleta Sanitary District (District). The Permittee and the District have been regulated by National Pollutant Discharge Elimination System (NPDES) Permit CA0048160 (WDR Order No. 96-21) since July 1996.

DISCUSSION

On November 1, 2002, the Regional Board adopted *WDR Order No. R3-2002-0078 for Local Sewage Collection Agencies Tributary to Monterey Regional Wastewater Treatment Plant, Monterey County*, per staff's recommendation. Staff also indicated its intent to prepare separate WDR Orders for other sewerage agencies tributary to wastewater

treatment facilities. Staff's recommendation to regulate sewerage agencies tributary to the City's Treatment Facility under the proposed WDR Order is consistent with staff's previous recommendation, the Regional Board's subsequent action, and recent waste discharge orders issued by other Regional Boards.

To date, collection system WDR Orders have been adopted for the following sewerage entities: Salinas, Marina Coast Water District, Monterey County DPW (Boronda, Castroville, and Moss Landing), Monterey, Pacific Grove, Seaside CSD (Seaside, Sand City, and Del Rey Oaks), Freedom CSD, Salsipuedes CSD, Pajaro CSD, Arroyo Grande, Grover Beach, Oceano, and Santa Barbara County. The proposed Order is consistent with requirements adopted for these sewerage entities.

Additional reasons for separating requirements for the collection systems from the District's NPDES Permit include expectation that such action will result in:

- Increased awareness and responsibility of the Permittee to facilitate proactive wastewater collection system management.
- The Permittee having a clear set of requirements applicable to its system, as opposed to having collection system requirements incorporated with other requirements in the NPDES Permit.
- Regional Board's improved ability to regulate each system independently. If compliance issues arise, the Order allows the Regional Board to work with the particular system to return it to compliance independently from the other system.
- The proposed Order will allow for more clear tracking through both electronic and hard copy files. This will enable greater efficiency in the evaluation of the collection systems' compliance with applicable requirements.

It is essential that the District's proposed NPDES Permit No. R3-2004-0129 and the proposed Waste Discharge Requirements Order No. R3-2004-0130 be adopted concurrently. Since the NPDES Permit

will no longer directly regulate the collection system agencies, these Waste Discharge Requirements are necessary to ensure consistent Permittee regulation.

The Permittees own and/or operate wastewater collection systems in Santa Barbara County tributary to the Treatment Facility. Properly designed, operated, and maintained wastewater collection systems are meant to collect and transport all of the wastewater that flows into them to a publicly owned treatment works. However, occasional unintentional discharges of wastewater from municipal sewers occur in every system. Unintentional discharges are commonly referred to as wastewater collection system overflows (or simply overflows). These overflows have a variety of causes, including but not limited to severe weather, improper system operation and maintenance, and vandalism. Nationwide, the United States Environmental Protection Agency (USEPA) estimates that there are at least 40,000 sewage overflows each year. Untreated sewage overflows can contaminate State waters, causing serious water quality problems. Sewage system blockages can back-up into basements, causing property damage and threatening public health.

Many avoidable overflows are caused by inadequate or negligent operation or maintenance, inadequate system capacity, and improper system design and construction. Overflows can be reduced or eliminated by:

- Regular sewer system cleaning and maintenance, including video surveys.
- Reducing infiltration and inflow through system rehabilitation and repairing broken or leaking service lines.
- Enlarging or upgrading sewer, pump station, or sewage treatment facility capacity and/or reliability.
- Constructing wet weather storage and treatment facilities to treat excess flows.
- Proper and ongoing employee training.

Communities need to address overflows during sewer system master planning and facilities

planning, or while extending the sewer system into previously unsewered areas.

Some overflows are unavoidable. Unavoidable overflows include those occurring from unpreventable vandalism, some types of pipeline blockages, extreme rainfall, and acts of nature (e.g., earthquakes or floods).

Spill History: Since 1999, the Regional Board violation tracking system does not identify reports of overflows from the Permittees' collection systems.

The NPDES Permit that previously covered the sewerage agency required the Permittee's compliance with some sections of the Standard Provisions related to wastewater collection systems. The additional guidance included in the proposed Order requires regular reporting and will facilitate better Regional Board tracking and response.

The proposed Order requires the Permittees to develop a Wastewater Collection System Management Plan (Management Plan). The Management Plan is a more detailed and comprehensive approach to spill prevention with the goal of reducing overflow frequency and impacts. The Management Plan builds on the programs required by the previous NPDES Permit, and provides for their integration as the Management Plan is developed. Specific guidance regarding Management Plan contents is included as Monitoring and Reporting Program (MRP) Attachment 1 (to be adopted as part of the Order).

Beach Closure: In accordance with State statutes, the Santa Barbara County Health Department monitors ocean waters at public beaches and water contact recreation areas. Water samples are collected from sites that are: 1) visited by over 50,000 people annually; and 2) adjacent to storm drains (including rivers, creeks and streams). Collected samples are analyzed for bacteriological "indicator" organisms to determine the potential presence of pathogens known to threaten human health. Elevated indicator organism concentrations are suggestive of contamination by human sewage and other wastes, which may result in human disease. When bacterial indicator organisms exceed

the State guidelines for beaches, the presiding County Health Department takes appropriate actions to ensure that the public is safe, and that the causes of contamination are addressed. Raw sewage from collection systems is very high in bacteria (on the order of millions of bacteria per 100 milliliters), so any collection system overflows that discharge to beach waters threaten to violate public health standards for recreation.

The California Department of Health Services' minimum protective bacteriological standards for waters adjacent to public beaches and public water-contact sports areas are established in the California Code of Regulations, Title 17, Section 7958, and are as follows:

- (1) Based on a single sample, the density of bacteria in water from each sampling station or beach or public water contact sports area shall not exceed:
 - (A) 1,000 total coliform bacteria per 100 milliliters, if the ratio of fecal/total coliform bacteria exceeds 0.1; or
 - (B) 10,000 total coliform bacteria per 100 milliliters; or
 - (C) 400 fecal coliform bacteria per 100 milliliters; or
 - (D) 104 enterococcus bacteria per 100 milliliters.
- (2) Based on the mean of the logarithms of the results of at least five weekly samples during any 30-day sampling period, the density of bacteria in water from any sampling station at a public beach or public water contact sports area, shall not exceed:
 - (A) 1,000 total coliform bacteria per 100 milliliters; or
 - (B) 200 fecal coliform bacteria per 100 milliliters; or
 - (C) 35 enterococcus bacteria per 100 milliliters.

Ocean water quality standards for public beaches establish numeric limits for total coliform bacteria, fecal coliform bacteria, and enterococcus bacteria. These organisms do not necessarily cause disease in humans. They are indicators of microbiological contamination and are used as a substitute by health authorities for disease causing organisms (such as hepatitis, dysentery, cholera, etc) that are likely to be present in sewage, but are difficult to analyze for directly. Statewide standards establish levels of bacteria that should not be exceeded at public beaches or public water contact sports areas. Contact with contaminated ocean water may cause illness.

Enforcement: The Water Code provides for discretionary penalties for unauthorized discharges, which, with few exceptions, include sewage overflows. The proposed Order does not change Regional Board enforcement authority.

The proposed Order's overall goal is consistent with the Permittees' goal to minimize overflows through a consistent and proactive collection system management program. The proposed Order allows local sewerage agencies to document and expand established programs while continuing to improve on collection system maintenance and operations.

ENVIRONMENTAL SUMMARY

Waste discharge requirements for related discharges are exempt from the provisions of the California Environmental Quality Act (Public Resources Code, Section 21000, et. seq.) in accordance with Section 13389 of the California Water Code, and 14 California Code of Regulations Section 15301 (existing facilities).

CHANGES MADE TO DRAFT ORDER AFTER DRAFT MAILING

1. Staff recommends amending Prohibition A.2 as follows:

The discharge of chlorine or any other toxic substance used for disinfection and cleanup of sewage overflows to any surface water body is prohibited. (This prohibition does not apply to the chlorine already present in the potable

water used for final wash down and clean up of overflows.)”

This clarifies that chlorine added to potable water is not excepted from this provision. This recommendation is consistent with the Regional Board's adoption of Order No. R3-2004-0123 on October 22, 2004, which applies to collection systems tributary to the City of Santa Barbara's El Estero Wastewater Treatment Facility.

2. For clarification, staff recommends moving Provision C.2 to Implementation Requirement D.1, and renumbering subsequent paragraphs in each affected section.

This recommendation is consistent with the Regional Board's adoption of Order No. R3-2004-0123 on October 22, 2004, which applies to collection systems tributary to the City of Santa Barbara's El Estero Wastewater Treatment Facility.

COMMENTS AND RESPONSE

Drafts of Order No. R3-2004-0130 were mailed to all known interested parties and agencies. Written comments submitted to the Regional Board by November 4, 2004, will be addressed in this section, including staff responses to comments, and any subsequent staff actions.

ATTACHMENTS

1. Proposed Order No. R3-2004-0130 and Monitoring & Reporting Program No. R3-2004-0130

RECOMMENDATION

Pending

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Task: 126-01
File: To Be Established