

ITEM: 20

SUBJECT: City of Dixon, Dixon Wastewater Treatment Facility, Solano County

BOARD ACTION: *Consideration of Revised Waste Discharge Requirements and Cease and Desist Order*

BACKGROUND: The City of Dixon's Wastewater Treatment Facility (WWTF) treats domestic and industrial wastewater from a community with 18,500 residents and approximately 5,000 sewer connections. Wastewater is currently treated using nine stabilization treatment ponds and four polishing ponds. The ponds are unlined and have a total surface area of 122 acres. Treated wastewater is disposed using percolation basins that have a total surface area of 160 acres. The WWTF also has 120 acres of land application area, but those fields have not been used for disposal since 2009.

In 2008, the Board adopted Cease and Desist Order (CDO) R5-2008-0136 because of longstanding concerns about groundwater pollution due to salinity constituents. The City instituted a water softener ban and buy-back program to reduce effluent salinity to comply with the CDO. The City also completed extensive studies to determine background groundwater quality, the level of groundwater degradation caused by the City's discharge, and site-specific numeric water quality objectives to protect local agricultural beneficial uses of groundwater. The development of site-specific water quality objectives for salinity was completed in cooperation with CVSALTS.

In order to ensure that future discharges do not cause exceedance of the site-specific water quality objectives, the City plans to construct an activated sludge treatment system and decommission the 122 acres of unlined treatment ponds to improve treatment and minimize evapoconcentration of salts. The new system will consist of two treatment trains operated in parallel. Each treatment train will consist of a concrete oxidation ditch and a secondary clarifier. The new WWTF will minimize evapoconcentration during treatment and effluent disposal.

A new CDO is proposed as a companion order to the revised WDRs to set a compliance schedule for completion of the new WWTF.

ISSUES: **Comments on the tentative WDRs and draft CDO were received from the City of Dixon, the Central Valley Clean Water Association (CVCWA) and the Dixon Chapter of the Solano County Taxpayers Association (SCTA). Several relatively minor changes were made to address the comments. Key issues are summarized below and discussed in detail in the attached Response to Comments.**

A. Discharger Comments

The City of Dixon submitted comments on the proposed WDRs and CDO requesting certain editorial changes to the tentative WDRs. Revisions were incorporated as appropriate.

The City requested that the final effluent limits for boron and total nitrogen be increased based on information that was provided during the public comment period. These changes were made based on the supporting data. The Discharger also requested that the interim effluent limits be increased to accommodate potential issues associated with construction of the new WWTF. This change was not made because the City did not explain why the change was necessary.

B. Solano County Taxpayers Association (SCTA) Comments

The SCTA submitted a letter on April 18th and comments on the proposed Orders on June 9th stating that the proposed WDRs and CDO do not adequately address project alternatives and that the proposed WWTF will not remove constituents of concern from the waste stream and is unnecessarily costly.

SCTA also states that the proposed WDRs do not account for current data in establishing effluent limits and that removing the sludge from the decommissioned wastewater ponds is not necessary.

C. Central Valley Water Association (CVCWA) Comments

The CVCWA submitted comments on the proposed Order. Minor revisions were made to address those comments. CVCWA expressed concern about the proposed approach for determining compliance with the groundwater limitations of the WDRs. No revisions were made to address this comment, as explained in the Response to Comments.

RECOMMENDATION: Staff recommends adoption of the Revised WDRs and new Cease and Desist Order.

Mgmt. Review RDB
Legal Review PEP

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