

**13/14 AUGUST 2020 BOARD MEETING
CONTESTED AGENDA ITEM**

AGENDA ITEM: 7

SUBJECT:

CITY OF SACRAMENTO, COMBINED WASTEWATER COLLECTION AND TREATMENT SYSTEM, SACRAMENTO COUNTY

BOARD ACTION:

Consideration of NPDES Permit Renewal (NPDES Permit CA0079111)

BACKGROUND:

The City of Sacramento (Discharger) owns and operates a combined sewer system (CSS) that conveys domestic and commercial wastewater and storm water runoff from downtown Sacramento, East Sacramento, and Land Park areas. The Discharger also owns and operates a separate sanitary sewer system that conveys domestic and commercial wastewater. A portion of the separated sanitary sewer system surrounding the CSS contributes flows to the CSS.

Collection and transport of the combined sewage in the CSS is managed by four main facilities: Sumps 1/1A, Sumps 2/2A, the Pioneer Reservoir Treatment Plant, and the Combined Wastewater Treatment Plant (CWTP). The majority of flows from the CSS service area are routed to the Sacramento Regional County Sanitation District's Sacramento Regional Wastewater Treatment Plant (SRWTP) for treatment prior to discharge to the Sacramento River, except during large storm events. When rainfall causes flows at Sump 2A to exceed 60 million gallons per day (MGD), the excess is diverted to the CWTP and Pioneer Reservoir Treatment Plant first for storage, and then when storage capacities are depleted, for primary treatment including disinfection and discharge to the Sacramento River. Several remote storage facilities within the CSS are also used to minimize the potential for localized flooding. The entire separated and combined sewer collection system serves approximately 276,000 people.

Discharges from the Facility are currently regulated by Waste Discharge Requirements Order R5-2015-0045, issued by the Central Valley Water Board on 17 April 2015. An Order is proposed to renew the NPDES permit. The proposed Waste Discharge Requirements (NPDES Permit) authorize combined sewer overflow (CSO) discharges to the Sacramento River in accordance with the U.S. Environmental Protection Agency's CSO Control Policy. The proposed NPDES Permit requires continued implementation of the CSO Control Policy's Nine Minimum Controls and the Discharger's

Long-Term Control Plan and requires an updated Water Quality Assessment.

ISSUES:

The tentative Order was issued for a 30-day public comment period on 23 April 2020 with comments due by 25 May 2020. Public comments were received from the Discharger and several concerned citizens. Central Valley Water Board staff have modified the proposed Order based on the comments received. Below is a summary of the significant comments and staff responses. Details are provided in the Staff Response to Comments document included in the agenda package.

Statewide Bacteria Objectives. The Discharger commented that Statewide Bacteria Objectives supersede the Central Valley Water Board's bacteria objectives based on fecal coliform, so the fecal coliform receiving water limits should be removed.

Central Valley Water Board staff concur and revised the proposed permit accordingly.

Separating Sewer Systems. Several concerned citizens commented that the Combined Sewer System should be replaced with separate sewer and storm water collection systems as a necessary step towards ensuring safe and well managed sewerage.

Central Valley Water Board staff do not concur. The Discharger has concluded that the separation alternative is not feasible. The Discharger has discretion to design and construct projects in accordance with Federal, State, and local regulations and policies, considering the costs and benefits of various approaches. The Central Valley Water Board cannot specify methods of compliance with waste discharge requirements to dischargers.

Increasing Flows Due to Growth. Several concerned citizens commented that new planned urban growth, such as the Railyards and River District, and lack of green infrastructure is increasing flows to the CSS at a rapid rate and will result in more overflows and outflows.

Central Valley Water Board staff concur that growth from new development and re-development has the possibility to increase flows within the CSS and is a concern. The Discharger implements measures to address growth and flows have been decreasing over time. However, the proposed permit has been modified to add a new provision that requires the Discharger implement measures to the maximum extent

practicable to ensure overflows and outflows do not increase, and the overall percentage of flow routed to the Sacramento Regional Wastewater Treatment Plant does not decrease due to growth within the CSS service area.

RECOMMENDATION:

Adoption of the proposed NPDES permit renewal.

REVIEWS:

Management Review:	James Marshall
Legal Review:	JMJ July 23, 2020

BOARD MEETING LOCATION:

Central Valley Regional Water Quality Control Board meeting
11020 Sun Center Dr. #200
Rancho Cordova, CA 95670

Internet Zoom Meeting