STATE OF CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL COAST REGION

STAFF REPORT FOR REGULAR MEETING OF NOVEMBER 19-20, 2015 Prepared on October 14, 2015

ITEM NUMBER: 9

SUBJECT: Revision of Waste Discharge Requirements, Reissuance of National Pollutant Discharge Elimination System Permit No. CA0048151 for City of Pismo Beach, San Luis Obispo County, Order No. R3-2015-0016

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KEY INFORMATION

Location:	570 Frady Lane, Pismo Beach, CA 93449
Place ID:	248519
Type of Discharge:	Secondary-treated municipal wastewater
Permitted Flow:	1.9 million gallons per day (MGD; dry weather flow design capacity)
Average Flow:	1.08 MGD
Type of Treatment:	Treatment train unit processes consist of one bar screen in the headworks, two oxidation ditches, two secondary clarifiers, one dissolved air flotation thickener, one chlorine contact basin and dechlorination unit
Disposal Method: Solid Wastes: Existing Orders:	Pacific Ocean discharge through a 4,400-foot long outfall/diffuser system Offsite disposal of biosolids to composting facility Waste Discharge Requirements Order No. R3-2009-0047
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This Action: Adopt Order No. R3-2015-0016

DISCUSSION

City of Pismo Beach (Discharger) owns and operates a wastewater collection and treatment system. The Discharger disposes of its secondary-treated wastewater to the Pacific Ocean through an outfall-diffuser system transporting effluent from both the City of Pismo Beach and the South San Luis Obispo County Sanitation District. This agenda item considers the reissuance of the existing NPDES permit. The Fact Sheet, Attachment F of the proposed Order, includes the legal requirements and technical rationale that serve as the basis for the requirements of the permit.

Proposed Recycling

Since the time of the Discharger's application for NPDES permit renewal, the Discharger has completed a recycled water facilities planning study. The April 2015 study recommends an upgraded treatment process to produce recycled water meeting standards for recharge directly into an inland groundwater aquifer. Preliminary schedule estimates indicate the project could move forward during the term of this proposed permit. If the Discharger will materially change

its discharge's characteristics as a result of this project, it will apply for revision of this permit as needed. The draft permit includes this discussion on page F-6 (Planned Changes).

Changes from the Existing Order

The proposed Order is structured in accordance with the statewide NPDES permit template. The proposed Order is consistent with the previous Order with the exception of the following changes/modifications:

Substantive changes

- The reasonable potential analysis (RPA) concluded no "reasonable potential" (i.e., endpoint 2) to exceed water quality objectives for arsenic, zinc, ammonia, and chloroform. Therefore, effluent limitations for those pollutants have been removed from the permit. This is discussed in the Fact Sheet section IV.D (page F-25) and reflected in Tables 5 and 7.
- The Discharger's pretreatment requirements (page 14) have been clarified based on the application information indicating no significant or categorical industrial dischargers within the service area. In the event the Discharger begins accepting industrial waste (different than currently described by their application information), the permit will need to be reopened and amended.
- Sampling frequency is increased from annual to semiannual for chlorodibromomethane, dichlorobromomethane, copper, and nickel based on the results of the RPA endpoint 1 (table E-3, page E-4). This change is discussed in Fact Sheet Page F-29 Section VII.B.
- Clarification regarding resampling frequency in the event of bacteriological single sample maximum exceedances has been added (page E-10 footnote to Table E-7, Page 8 footnote 1). This added language is consistent with other ocean discharge permits within the region.
- Effluent limitations have been updated to be consistent with significant figures used in the calculations from water quality objectives from the California Ocean Plan. The previous permit contained inconsistent significant figures. The correction of the issue has resulted in some changes to effluent limitations. These changes are discussed in the Fact Sheet section IV.D.1 (page F-25).
- The detailed review of significant figures discussed in the previous bullet revealed mathematical errors in the mass loading effluent limitation calculations for carbon tetrachloride and toxaphene. For carbon tetrachloride, the effluent limitation was increased by a factor of 10. For toxaphene, the effluent limitation was decreased by approximately a factor of 10. These changes are discussed in the Fact Sheet section IV.D.1 (page F-25).
- Language requiring surf-zone bacteriological sampling for a minimum of seven days following operational upsets or effluent violations likely to increase surf-zone bacteriological concentrations has been updated (page E-10). Sampling will continue until compliance is demonstrated. The previous language was unclear as to the duration of sampling in these situations.

Minor changes

- Selected findings moved to Fact Sheet Section III. This is described in Finding B on page 3 of the permit.
- Clarified Table E-10 identifying sampling frequency and Section X.B electronic selfmonitoring reporting requirements.
- Monitoring and Reporting Section IX.A biosolids language updated (page E-13) to be consistent with the State Board template and other Central Coast Water Board ocean discharge permits.
- Added a note to the description of monitoring locations RSW-001 through RSW-004 to indicate they are historical monitoring locations (Table E-1, page E4). The locations are retained to help with references to previous monitoring reports, as needed.
- Updated Ocean Plan references to the 2012 edition.
- Updated the Central Coast Water Board standard provisions to the 2013 edition.
- Benthic sediment monitoring locations added (Table E-1, page E-4) to aid in data reporting.
- Changed U.S. EPA discharger monitoring report (DMR) submittal requirements to electronic through the CIWQS database. Paper reports had already been discontinued through upgrades in the CIWQS database. (Standard Provisions page D-12 and MRP page E-19).
- Added Special Provision language (page 15) for water-contact and shellfishing beneficial use areas. The Ocean Plan requires reliable disinfection for areas where separation alone is inadequate to protect water-contact and shellfishing beneficial uses. The added language clarifies the Discharger is required to maintain reliable disinfection to meet bacterial effluent and receiving water limitations.

COMMENTS

 Central Coast Water Board staff received one comment letter during the public comment period, which closed September 18, 2015. The Oceano Dunes District of California State Parks expressed concern "that the [California State Parks North Beach Campground Recreational Vehicle Dump Station] continue to be allowed to operate and expand as necessary to address the needs of park users."

The State Parks letter was "seeking assurance that the City's permit renewal will not preclude our ability to continue to operate the North Beach Campground recreational vehicle dump station as planned."

Based on Water Board staff's review of available historical records, the State Parks RV dump station is a known historical contributor to the Discharger's collection system. Water Board staff found reference to the dump station in a letter dated December 1991 describing suspected illegal dumping of chemical toilet or industrial operations into the State Park RV dump station, as it was unfenced and unsecured at the time of the letter. While not specifically described in the Discharger's current permit application, the State Parks RV dump station does reasonably appear to be a currently expected sewer collection system discharger.

The Discharger owns the lift station, sewer collection system, and wastewater treatment plant providing service for the State Parks campground. Any State Parks expansion or operation issues should be addressed and discussed between State Parks and the Discharger. The Discharger has the right to refuse or expand service in its collection system area, provided it complies with the provisions of its NPDES and other applicable permits. If the Discharger wishes to work with the State Parks to increase flow contribution from the campground area, it may do so at its discretion, provided it does not result in a violation of the NPDES permit (e.g., unanticipated wastewater contaminants or treatment capacity problems).

RECOMMENDATION

Adopt Order No. R3-2015-0016, as proposed.

ATTACHMENT

For copies, please refer to the Central Coast Water Board's internet website at:

http://www.waterboards.ca.gov/centralcoast/board_info/agendas/2015/2015_agendas.shtml

- 1. Proposed Order No. R3-2015-0016, including the following associated attachments:
 - Attachment A Definitions Attachment B – Map Attachment C – Flow Schematic Attachment D – Standard Provisions Attachment E – Monitoring and Reporting Program (MRP) Attachment F – Fact Sheet

CW-248519

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