CLEAR CREEK SYSTEMS, INC. OVERVIEW OF ADVANCED TREATMENT FOR CONSTRUCTION STORMWATER IN CALIFORNIA

October 21, 2004



Presentation Overview

I. Brief HistoryII. Where We Were Last SeasonIII. Where We Are This SeasonIV. Where Are We Going?

Definitions

• Polymer

- "Any of numerous natural and synthetic compounds of usually high molecular weight consisting of up to millions of repeated linked units, each a relatively light and simple molecule."
- Coagulate
 - "To cause transformation of (a liquid or sol, for example) into or as if into a soft, semisolid, or solid mass."
- Flocculate
 - "To cause (soil) to form lumps or masses.
 - To cause (clouds) to form fluffy masses."

As defined in Webster's Dictionary

Brief Background

- Technology adapted from industrial sector
- Polymer treatment & EC started in WA
 - Very tightly regulated
 - Case by case basis until confident in reliability
- CA much more incremental route to AT
 - Not as much political commitment
 - Reasonable cost more of an issue
 - Different regulatory structure
- Lack of regulation led to spills

CCS & UC Berkeley Polymer Evaluation for Fish & Game



The Results: Highly Effective



Where We Were Last Season

- Major increase in regulatory enforcement
- Brought about major change in operations
 Just implementing SWPPP no longer enough
- Paradigm shift—End result matters
 - Effluent water quality in line with background
 - Need to handle entire storm volume
- About 15-20 projects in Sac. area
- Adaptations to construction operating env.

What This Meant

- Improvements developed in
 - Operations
 - Costs
 - Reliability
- Still two sites with unauthorized discharges
- Not good odds

Where We Are This Season

- Value of AT to provide clear water is proven
- Incorporation as BMP and BAT
- Use is greatly expanding
- Concerns about reliability & env. safety

What This Means

- Maybe 30-50 sites using AT
- New technologies and service providers
- Continued improvements in
 - Operations
 - Costs
 - Reliability
- New testing and monitoring requirements

Operational Issues

- Educating Contractors on site needs for AT
- Contractors planning ahead
- Equipment availability
- Improving existing system designs
- Trained personnel—only needed when it rains

Cost Issues

- Higher cost than in the past—doing nothing
- Cost continuing to decline
 - Better equipment designs
 - Contractors planning ahead
 - Economies of scale
- Temptations to cut corners

Reliability Issues

- High volume flow through systems are new
- Better conceptual designs for SW operations
 - Equipment from other sectors needs adaptations
 - Contractors originally used materials they knew
- Temptations to cut corners
- Very dynamic operations
- Practice of 100% compliance is relatively new

New Testing & Monitoring

- Must be able to test for any materials used and all known by-products
- Test must be quantitative & "scientifically defensible"!
- Detectable limit must be below chronic toxicity level
- Field tests not required, but at risk if results are delayed due to lab turnaround time
- "Qualified personnel" must monitor "frequently"
- Results of monitoring must be kept with the SWPPP

Testing & Monitoring (Continued)

- Limits the products due to available data
- Chronic toxicity data not common (understatement)
- Residual testing capability not common
- When forced, manufacturers are more helpful
- Main issue here is when used improperly
- Various level of security for different polymers
- By-products testing rule opens doors
 - "no exposure/no test"
- For what species is chronic toxicity data required?

Where Are We Going

- Much more widespread use
- Revision of regulatory language
- Tighter regulations of other contaminants?

What This Means

- Much greater number of sites
- Greater regulatory scrutiny?
- Continued improvements in
 - Operations
 - Costs
 - Reliability

Operational Issues

- Adaptations for a wide range of conditions
- New technologies and materials
- Organized training for operators?

Cost Issues

- Price will continue to go down
 Volume
 - More cost effective technologies and designs

Reliability Issues

- Bugs worked out
- More environmentally safe designs
- Real time testing

A HIGHLY EFFECTIVE TOOL



TO ENSURE STORMWATER QUALITY

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