



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

MONTHLY UPDATE

April 2008

A Message from the Executive Director...

Last year at this time, you may recall I wrote an article on the threat posed to our treatment plant operators by the reported migration of the California moray eel through the various ocean outfalls. Most of you easily discovered that was simply my attempt at some April fools humor. I was considering writing something similar this year when I came to the realization that I didn't have to make anything up this time. In reality, there are so many actual threats to our facilities and operations these days that any fabrication on my part would be redundant. For example, a recent news article detailed how giant pythons large enough to swallow an alligator are migrating from Florida to the San Francisco Bay area at the rate of 20 miles per month. It's estimated that they will be arriving in the Golden State sometime in the year 2020. You are all aware I'm sure of the quagga mussel invasion that is worrying water officials all over the state. I just read where scientists are reporting that they are thriving in the desert and reproducing at a rate three times faster than when they infested the Great Lakes years ago. But what happens when they get into our wastewater systems? I'm certain it won't be long before we start seeing SSOs caused by these pesky mussels attaching themselves to the roots in our sewer systems and gorging themselves on all of those ever-present fats, oils and greases. In fact, I have it on good authority that some of our most prestigious consulting firms are already designing manholes with ten foot covers, in preparation of having to extract these menacing bivalves.

On a more serious note is a February 17, 2008 *Los Angeles Times* article headlined, "Study finds human medicines altering marine biology." It goes on to say that sewage treatment plants in Southern California are failing to remove hormones and hormone-altering chemicals from water that gets flushed into coastal ocean waters. The State Water Board is proposing to impose stringent monitoring requirements and salinity management plans in conjunction with the use of recycled water as part of its draft Recycled Water Policy. They are also contemplating limiting SEP (supplemental environmental project) funding to a maximum of 25% of any assessed penalty amount under the provisions of their proposed Enforcement Policy. Not to mention the state's proposed Compliance Schedule Policy that imposes a strict schedule limiting the duration for compliance of remedial measures to five years or the life of the permit, whichever is less. And the list goes on.

In order to stay abreast of these possible threats (excluding pythons and mussels) as well as new emerging issues, the SCAP Board of Directors and committee chairs/vice-chairs recently

Upcoming Meetings

Air Quality Committee Meeting –
Wednesday, April 2nd, 10 am – 12
noon, at LACSD.

Biosolids Committee Meeting –
Tuesday, April 8th, 9 am – 11 am. –
City of Riverside.

**Collection Systems Committee
Meeting** – Thursday, April 10th,
10am – 2pm, at Goleta Sanitary
District.

spent an entire day together strategizing on the future direction of our organization. Believe me when I say that it was quite a sacrifice on their parts to donate a full day's work away from the office and for some, the long drive meant coming in the night before. To make it even more of a hardship, that afternoon the news broke concerning the SWRCB staff's decision to go forward with requesting Board adoption of the recycled water policy without any further stakeholder input. This resulted in many of the participants having to fight late afternoon traffic and return to work in order to meet the impending comment period deadline. I have to admit I was in awe and humbled by the depth of knowledge and experience brought to the table by these individuals. What a unique opportunity it was to spend time brainstorming ideas with arguably some of the brightest minds in the wastewater industry. What evolved from this planning session was a clear, concise focus on what SCAP's mission is to be in the coming years. Our new Mission Statement, once it's adopted by the Board this June, will be: **"The mission of the Southern California Alliance of Publicly Owned Treatment Works (SCAP) is to provide leadership, technical assistance, and timely information to promote regulations that focus on the sustainable protection of the environment and public health."**

Legislative advocacy and specialized training will be left to the various statewide organizations whose mission it is to provide these types of member services. SCAP will continue to provide regular committee meetings, workshops and conferences featuring regulatory, technical, and operational issues of importance. SCAP will use its resources, i.e., website, newsletter, alerts, etc., to provide a clearinghouse for wastewater related information of value to our members and the public. A renewed emphasis will be placed on growing our web-based resource libraries in order to develop a collection of air, biosolids, collection systems, and water related documents, as well as sharing of public relations and educational materials that have been developed by some of our members.

In an effort to provide assurance that SCAP's new mission is being met, the Board established the following goals for the next two years:

- Promote integration of recycled water into the region's water resources
- Review SCAP's overall administrative operations
- Increase membership to 100 members
- Assist in developing long-term beneficial use of biosolids
- Compile on the SCAP website, a resource library of public relations materials that assist members in communicating with their public

Meeting these goals will certainly be challenging but not impossible with all of your help. I sincerely hope that the services SCAP offers and the fulfillment of these goals will provide a definite benefit to your agency and that you would keep this in mind when considering the renewal of your annual membership. I would like to again thank the Board and the committees for their assistance in developing a blueprint for the future that ensures SCAP will remain focused on providing tangible benefits to our members.

Strategically yours,

John Pastore

Air Quality by Chair Daniel McGivney**SCAQMD Amended Rule 1110.2**

The new requirements of SCAQMD Rule 1110.2 have been on the books for almost 2 months now and many issues regarding implementation of these new requirements have arisen. Most of them regard how quick some of the deadlines come up, others regard how to design and implement solutions. The new rule contains many requirements that have early compliance deadlines:

- the operator of any engine with an existing CEMS shall begin the reporting required by SCAQMD Rule 218 subdivision (f) beginning January 1, 2008 (first report due June 30, 2008);
- applications to request an adjustment to the 90% biogas monthly fuel throughput requirement must be submitted by April 1, 2008;
- any engine that will exceed the every 2 years or 8760 hours threshold for performing a formal emissions source test (the old requirement was every 3 years) must get the engine tested (per the new source testing requirements in the rule) by August 1, 2008;
- applications to utilize efficiency corrected emissions limits must be submitted by April 1, 2008 (possibly August 1, 2008, there appears to be conflicting requirements);
- applications to add operating restrictions to engine permits as required by the rule must be submitted by August 1, 2008 (operators must review rule requirements to determine when this requirement affects their engine permits);
- for any engine that is required to have an air to fuel ratio controller (AFRC) and either does not have one or does not have it listed in the existing SCAQMD Permit to Operate an application must be submitted by May 1, 2008; and
- for any engine requiring an Inspection and Maintenance plan, the plan application package must be submitted to the SCAQMD by August 1, 2008.

The above requirements are only a few of the many new requirements incorporated into the recently amended rule. If you are an engine owner and/or operator, it is imperative that you review this rule carefully to ensure that you do not miss a compliance deadline. If you are an operator of more than a few engines, these requirements will likely put a significant strain on your operations and engineering staff to react quickly to the many compliance requirements and compliance time frames included in this rule. If there are any questions regarding any of these new requirements, please contact the SCAP office and you will be directed to one of the Air Quality Committee members for assistance.

Many of these requirements require an operator to review more than one section of the rule to completely understand what is being required. Additionally, some of these requirements will require an operator to invest in capital to meet compliance with the rule. These particular requirements will require engineering and construction activities, which require time. So again, it is extremely important that an operator look at this rule as soon as possible.

SCAQMD Rules 1146 and 1146.1 (by Tom C. Fang)

South Coast AQMD is amending Rules 1146 and 1146.1 to implement the 2007 AQMP Control Measure MCS-01 (Facility Modernization) as well as Cal. Clean Air Act (SB 656) provision for all feasible control measures. R1146 applies to boilers, steam generators, and process heaters with heat input ratings of 5 MMBtu/hr and above, while R1146.1 applies to units rated between 2 and 5 MMBtu/hr. For both rules, SCAQMD proposed a 15 ppm NOx limit for digester gas boilers and 25 ppm for landfill gas, effective 1/1/2015. For natural gas units subject to R1146, three size categories apply. For 5-20 MMBtu/hr boilers, 12 ppm NOx is proposed by 2013; for 20-75, 9 ppm NOx by 2012; for 75 MMBtu/hr or more, 5 ppm NOx is proposed by 2011. The 12 and 9 ppm limits are essentially existing BACT for new boilers, with SCR intended for boilers greater than 75 MMBtu/hr. Options include two extra years in exchange for lower NOx limits. The widening of applicability to include multiple boilers above 8 MMBtu/hr combined heat input is being reconsidered.

For PAR 1146.1, AQMD unveiled new proposals on 3/19/08. Previously proposed NOx limits for existing natural gas boilers of 20, 15, and 12 ppm are now replaced with a 9 ppm limit, effective 1/1/2012. This is lower than existing BACT of 12 ppm for boilers under 20 MMBtu/hr; public comment at the meeting centered on whether 9 ppm is continuously achievable on retrofitted units. The applicability change for multiple units with 3 MMBtu/hr or more is now removed.

Both rules also propose weighted NOx formulas for dual fuel units (biogas plus natural gas), and possible fuel efficiency allowances, as well as additional monitoring requirements. Low-use boilers will no longer be exempt but must meet 30 ppm NOx. Both rules are targeted for the 6/6/08 Board Hearing. A joint Public Workshop for 1146/1146.1 is scheduled for 4/2/08, 1 pm. Questions may be directed to SCAP Air Quality Committee via the SCAP office.

SCAQMD Board Climate Change Committee (by Greg Adams)

The first meeting of the new SCAQMD Board Climate Change Committee was held on March 20, 2008. Slated members are Dr. Burke (Chair), Gary Ovitt (Vice Chair) and Ron Loveridge,

Committee Chair Contact Info

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 Dan McGivney –
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Biosolids Chair:
 Mike Sullivan –
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Water Issues Chair:
 Gus Dembegiotes –
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Miguel Pulido and Tonia Reyes Uranga. Only Mayor Loveridge and Tonia Reyes Uranga were present (at remote locations) for the first meeting. Barry Wallerstein, the Executive Officer, gave the opening remarks and framed some of the issues. He said that climate change will touch every facet of SCAQMD programs, existing and new. Jill Whynot discussed the formation of the Technical Advisory Group, which included about twelve members including major business and local government representatives. The voluntary SoCal Climate Solutions Exchange was discussed, including key program design elements and how the Exchange might function, using the Chicago Climate Exchange as an example. Barry made a point of saying how the Exchange could help with local CEQA issues especially mitigation of GHG emissions. He cited the \$1MM that Chevron would give to the SCAQMD to use to offset GHGs as part of the El Segundo Refinery Modernization project.

Biosolids by Chair Mike Sullivan

Next Biosolids Committee meeting – April 8, 2008

The next Biosolids Committee meeting will be held on Tuesday, April 8th, at the City of Riverside, from 9:00 AM to 11:00 AM. The topics for the meeting will be land application capacity issues, regulatory and operational updates, and a roundtable discussion. As in the past, we have invited representatives from all the biosolids management companies to participate. Please send your RSVP to the SCAP office by Monday, March 31st.

Associated Press Story on the Land Application of Biosolids

On March 6, 2008, the Associated Press (AP) released an article prompted by a recent court decision involving a farmer's allegations that land application of biosolids during the 1980s had caused cattle death and soil contamination. The farmer, from Augusta, Georgia, has filed lawsuits dating back to the 1990s against the city of Augusta, USEPA, and other entities. The recent court decision, by U.S. District Judge Anthony Alaimo, ordered the USDA to compensate the farmer for loss of crop production. It should be noted that the case concerned the eligibility for USDA benefits and not the safety of biosolids land application.

The AP also reported that in 1999, there were allegations that Georgia dairy regulators and USEPA were informed that an analysis of dairy milk indicated high levels of contaminants, such as thallium, but the milk was never removed from distribution.

Water Environment Federation (WEF) staff indicated that over the past year, the AP has been developing an article, or series of articles, on the topic of land application of biosolids. Both WEF and CASA have been proactively following the development of the AP's interest in biosolids. It is expected that USEPA is developing a statement regarding Alaimo's ruling, and CASA is considering sending a letter to the USDA urging them to appeal.

For the original AP story, please visit

http://ap.google.com/article/ALeqM5gbbCMPX9_kRtYkL1Yv9-OzuVxFiQD8V86OUG0

Senator Boxer Letter

As a follow-up to this issue, CASA's Greg Kester met with Senator Boxer's staff in Washington D.C. during the CASA D.C. conference in March. Senator Boxer's aides indicated that they are interested in hearing a balanced perspective on biosolids and will schedule a conference call with CASA staff. Senator Boxer will be sending a follow-up letter to EPA, presumably asking for more information or clarification. Also, Senator Boxer plans on holding a hearing on biosolids this spring. The focus of that hearing was not disclosed in the meeting.

Collection Systems by Chair Ralph Palomares

Well, it's already April and next week we will be holding our second SCAP Collection Systems Committee meeting for 2008 in Goleta, Ca. If you have never been up there, you need to come to this meeting just to see how beautiful the area is. With the wildflowers blooming on the hillsides, it's just a spectacular view, so bring your camera for some awesome pictures to be taken of the flowers and the surrounding area. My hobby is photography, so I always have a Canon camera and a few different lenses in my bag of tricks for that special picture that one day I might sell to you. If you ever need a special sewer picture, just give me a call and I will look to see if I have it my photo library and, if I do, I will e-mail it to you.

We just finished a sewer force main bypass at El Toro Water District's Water Reclamation Plant in the City of Laguna Woods. Construction went smoothly with no major obstacles. The pipe itself looked very good after 40 plus years in service with, who knows, maybe another 20 years left after inspecting it with a sewer video camera. Without this technology, it would be only a guess at the condition of the pipe. The new WDR Order makes it mandatory that we look at all the types of pipe that we have currently in the ground. We did do some upgrades to the plant during the bypassing which lasted about 5 days.

On another note, our industry was slammed again with the drugs in the drinking water. It seems that the pills we are taking are making their way back into the drinking water ground basin, which is then pumped out to drink or bottle it. Either way, this issue is not going away soon. Does anyone know what happened to the drought???

I hope to see all of you at the SCAP Collection Systems Committee meeting on April 10th up in Goleta. I will be spending Friday up there also, so bring your fishing poles and let's have some fun after the meeting and socialize with each and talk dirty "about sewers and those good things".....Happy Spring.

Collection Systems Committee Meeting – April 10, 2008

The next Collection Systems Committee meeting will be held on Thursday, April 10th, at the Goleta Sanitary District from 10 a.m. until 2 p.m. A working lunch is provided. Please RSVP to the SCAP office no later than April 2nd if you are planning to attend this meeting.

Notification Requirements Update

As reported in last month's Monthly Update, the state has made an amendment to the Statewide General Waste Discharge Requirements (GWDR) Program No. 2006-003-DWQ for all public agencies under the Order to notify the State Office of Emergency Services (OES), the local health care agency and the appropriate Regional Water Quality Control Board (RWQCB) of any discharges of sewage that result in a discharge to a drainage channel or surface water. This notification must be done as soon as possible but not later than two (2) hours after the agency becomes aware of the discharge. The new amendment (Order WQ 2008-0002-EXEC) also requires that the discharger certify to the appropriate Regional Board that the notifications have been completed within twenty-four (24) hours of the discharger becoming aware of the discharge. The effective date for this new amendment was February 20, 2008.

Since the amendment was released, questions have arisen about the certification process and the procedures that need to be followed to be compliant with the amendment. The State Water Resources Control Board staff has stated that they will be sending out a clarification about the new notification requirement. For additional information on the new amendment, see the SWRCB's Sanitary Sewer Overflow Program website at <http://www.waterboards.ca.gov/sso/> or the SCAP website.

GWDR Reminder

The clock keeps moving ahead toward the next milestones of the General Waste Discharge Requirements (GWDR). On November 2, 2008, those agencies with populations served of 100,000 or greater are required to certify their compliance with the Legal Authority, Operations and Maintenance, Overflow Emergency Response Program and the FOG Control Program. Of this group of Sewer System Management Plan (SSMP) elements, the state requires that the Legal Authority be in place, meaning that any ordinances or resolutions that an agency needs for compliance with the Legal Authority must be adopted and implemented by the November 2nd deadline. If the other elements are not completed, an agency will be in compliance by providing a plan for their development and implementation.

On the SCAP website in the Members Only Reference section under Collections, you will find, in addition to the GWDR, the GWDR Factsheet and the new notification amendment, multiple files to assist in the preparation of the required Sewer System Management Plan (SSMP). Complete SSMPs for the Region 8 GWDR are available for use as models. The Region 8 GWDR is almost identical to the statewide GWDR and the available SSMPs make an excellent resource for SSMP structure and development. You will also find model FOG ordinances, model FOG programs, emergency response plans and other valuable information to assist with the development of each of the elements of an SSMP. In fact, there is even an SSMP evaluation and development template available that will guide you through step-by-step for each of the SSMP elements. An SSMP is essentially documentation on how an agency conducts its day-to-day business with an emphasis on specific aspects on its management, operation and maintenance. The template poses questions that are focused on these specific areas to assist in the development of the required documentation. There are also checklists, factsheets and development guides from throughout the state of California, as well as other states and the federal government available for use. To access this material go to the SCAP website at <http://www.scap1.org>.

CWEA Training Update

CWEA is currently developing its next training module to assist with the development of the SSMP. This next module is tentatively titled **SSMP Map, Measure, Maintain and Modify** and will offer instruction in developing elements 4, 5 and 9 of the GWDR/SSMP. The beta test for this new instructional module is tentatively scheduled for April 8th at East Bay Municipal Utilities District. Following the beta test, CWEA is anticipating holding up to 6 one-day workshops on this topic in the May-June time period. These training workshops will be held throughout the state with locations to be announced. This is CWEA's third SSMP training module since the state adopted the statewide GWDR. The first module was half day sessions on the GWDR reporting requirements with the second module being an all day workshop on the general development of an SSMP.

Water Issues Committee by Chair Gus Dembegiotes**Water Issues Committee Meeting**

The Water Issues Committee held its regular quarterly meeting on March 20th at the Inland Empire Utilities Agency. Susan Paulsen of Flow Science gave a presentation on the recently adopted State Policy regarding Sediment Quality Objectives, Part 1, For Enclosed Bays and Estuaries. She discussed the requirements of the new policy and how they would be implemented. Mary Jane Foley provided an update on the Statewide Water Recycling Policy that was considered by the State Water Resources Control Board (State Water Board) at its hearing on March 18th. The State Water Board granted the request of a stakeholder group to work on drafting an alternative policy and return within 90 days. This stakeholder group will be made up of CASA, ACWA, WaterReuse, California Coastkeeper, Heal the Bay, and the Planning and Conservation League. The first meeting of the group will be on April 4th. Sharon Green of LACSD updated the committee attendees on the status of the Water Quality Enforcement Policy. Several of the State Water Board members questioned the Policy's new requirements on Supplemental Environmental Projects. A new draft of the policy will be considered in April. Sharon also provided an update on the Statewide Compliance Schedule Policy, which was considered at the March 18th hearing. The State Water Board did not adopt the draft policy and instructed staff to consider extending the length of the proposed schedule from 5 to 10 years. Sharon also provided updates on several legislative bills at the State Legislature. AB 2986 (Leno) would provide letter grades to every collection system and treatment plant in California as well as posting of key documents. AB 2270 (Leno) would deal with salinity management and water softeners. SB 1391 sponsored by MWD is a spot bill that will deal with water recycling.

Proposed Statewide Policy to Protect Wetlands and Riparian Areas

The State Water Board was to consider the adoption of a proposed resolution supporting the development of a statewide policy to protect wetlands and riparian areas at its meeting on March 18, 2008 in Sacramento. Due to the number of items under consideration that day, the State Water Board deferred consideration of the item to its next meeting. The proposed

resolution would direct State Water Board staff to develop a policy in three phases. Phase 1 would establish a policy to protect wetlands from dredge and fill activities and to develop a definition of wetlands and a regulatory mechanism. Phase 2 would expand the scope of the policy to protect wetlands from all other activities affecting water quality. Phase 3 would extend the policy to riparian areas. The proposed resolution to develop the Policy is posted at:

<http://www.waterboards.ca.gov/cwa401/index.html#new>

NPDES Proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities

The State Water Board is providing notification that it is accepting comments on its NPDES Draft General Permit for Discharges of Storm Water Associated with Construction Activities. The proposed notice can be viewed at:

http://www.swrcb.ca.gov/stormwtr/docs/constpermits/draft/draftconst_notice.pdf

The proposed Draft Construction Permit can be viewed at:

<http://www.waterboards.ca.gov/stormwtr/index.html>

On August 19, 2004, the existing Construction General Permit expired. However, it still remains in effect until a new General Permit is adopted. On March 2, 2007, the State Water Board staff issued a preliminary Draft Construction Permit and received public comments. The preliminary Draft Construction Permit was revised in response to input received. The State Water Board will now hold two staff workshops, one on May 7th in Los Angeles and one on May 21st in Sacramento. The formal hearing on the draft construction permit will be held on June 4th in Sacramento. The Notice states that written comments on the draft construction permit are due to the State Water Board by noon on June 4th.

Regulatory Affairs by Regulatory Affairs Consultant Mary Jane Foley

“AP Probe Finds Drugs In Drinking Water.” I don’t know how many of the SCAP members got calls on this, but I got plenty. Anyone who knows me knows that I have spent my career in water resources both on the Safe Drinking Water Act issues as a member of the National Drinking Water Advisory Committee and also as a regulator of the Clean Water Act. The news article states that members of the AP National Investigative Team reviewed hundreds of scientific reports, analyzed federal drinking water databases, visited environmental study sites and treatment plants, and interviewed hundreds of officials, scientists, etc. The article is very lengthy and it covers cities around the nation. The bottom line is that pharmaceuticals are being found in drinking water in trace amounts, and no one knows what the impact is. Ben Grumbles, head of water for EPA says it all, “we are going to be able to learn a lot more.” When I served on the Drinking Water Advisory Council for EPA, one of the debates always circled around where to spend the dollars: wastewater or drinking water treatment. Some members wanted to combine the Safe Drinking Water Act with the Clean Water Act. It never got traction. The conundrum is how to get a handle on the best technology available and where to use it where it causes the best public health benefit. I suspected that some research entity would review this press release and pick up the challenge to assemble a group of scientists who understand the

water and wastewater industry to work on this ever-increasing controversial issue. In late March, the Urban Water Research Center (UWRC), located at the University of California, Irvine, sent out a mass e-mail seeking interest in creating a scientific panel of the topic of pharmaceuticals. I have been watching the response, and experts who I know are agreeing to convene with UWRC. I know there are national research efforts on the topic; the more we know the better to deal with all this.

Other news: The State Waterboard met on March 18, 2008. The two items on the agenda were the Recycled Water Policy and the Compliance Policy. SCAP has been active with all the other leaders in the industry in addressing these policies and the Enforcement Policy, which was heard several weeks ago. After much advocating with both Waterboard Members and staff, we are happy that both the Recycling Water Policy and the Compliance Policy were given more time, allowing for much needed improvements. I am sure that the SCAP Water Issues Chair, Gus Dembegiotes, has reported on the current status of the Recycled Water Policy, so I won't be redundant. John Pastore spoke on the Compliance Policy and got in critical points. He stated that there was very little public involvement on the Compliance Policy and little to no time to respond to the staff comments that came three days before the Board meeting. He emphasized that this is one of the most important issues to the wastewater municipal agencies, and more time was needed to work on revisions. We all continue to be involved on these very critical policies and are striving for something that is reasonable for our industry. I was ill and had to watch the meeting on webcast. The POTW community did a fantastic job giving real examples of why a 5-year compliance schedule is unrealistic, putting public agencies in jeopardy for minimum mandatory penalties and citizen law suits.

The Enforcement Policy is scheduled to come back to the Board in April. One of the SCAP members, Sharon Green, LACSD, has been on an Enforcement Policy Working Group. Some of the items that were suggested from our industry have been incorporated into the policy, such as classification of highest threats to water quality, etc. Sharon Green gave an update at the March SCAP Water Issues Committee meeting and shared that the theme of this policy is to create a significant detrimental effect for violations, probably through much higher penalties. Besides a belief that the penalties may be raised, the use of Supplemental Environmental Projects (SEPS) that keeps penalties local may be vastly revised. The next draft will out in April, and once SCAP receives it, we will send it on to our membership.

One piece of interesting Legislation is AB 2986 (Leno), the California Clean Water Act. The sponsors are the Friends of the Earth and the San Francisco Baykeeper. The motivation of this bill is the sewer spills in January into Richardson Bay in the Marin area. According to the fact sheet that was forwarded to all the SCAP members, AB2986 seeks to inform every community in California about the health of their sewer systems and ensures that problem systems will be clearly identified to voters and rate payers. The proposed bill requires the State or Regional Water Quality Control Board to give a report card (A, B, C, or D) to every collection system and every sewage treatment plant in California based on objective methodologies for measuring system performance. The bill's public information provisions require state permits, monitoring data, inspection reports, enforcement orders, violation, etc. to be made available for public viewing and downloading on the State and Regional Water Board websites. This bill also authorizes the State Board to charge fees to waste dischargers to cover the cost on implementing these provisions.

Help Desk

Remember, the HELP DESK is open 24/7 for members who need to discuss permitting issues and strategies to assist agencies in resolving problems with regulatory agencies. Please contact Mary Jane Foley at mfoley@scap1.org

Non Sequitur

"The first of April is the day we remember what we are the other 364 days of the year."

Mark Twain