



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

Monthly Update

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May 2009

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Upcoming Meetings

Air Quality

Tuesday, May 12, 2009
10:00-12:00 noon, at LACSD.

Biosolids

Thursday, July 21, 2009
9:00-12:00 noon, at LACSD

Collection Systems

Wednesday, May 13, 2009
9:00-1:00pm, at City of Riverside
WQCP.

Energy Management

Tuesday, July 28, 2009
9:00-1:00pm, at LACSD.

Water Issues

Tuesday, May 26, 2009
9:00-12:00 noon, at City of San
Diego's MWWD EMTS Lab Bldg.

POTW Energy Management Workshop

Tuesday, June 23, 2009
8:00-5:00pm, at SCE's CTAC in
Irwindale, CA.

SCAP Staff

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A Message from the Executive Director...

I am writing this column in honor of Earth Day 2009, which caused me to reflect on the many different avenues one can take to effect a change in the environment through one's personal lifestyle. But the first question that comes to mind is, "at what cost"? I've often thought how great it would be to install solar panels on my roof to provide both electricity and solar heating. I surmised that the money saved each month on my utility bill, plus the rebates and tax incentives would probably pay for my purchase of a new Prius in no time. I would then parlay the fuel savings and tax credits from driving the Prius into my beleaguered 401K savings account in the hopes that someday I might be able to retire. Not only that, but I would be the envy of all my neighbors. Was I ever in for a surprise! Have you ever heard the expression, "things aren't always as they seem"? The first thing I found out was that the "experts" say if your roof is older than 7 years, it is suggested you replace your roof before you begin. Yikes! That just added at least \$15,000 to the cost. Then it was disclosed to me that thermal solar systems for heating have a much shorter life than those designed for electrical use. Okay, scratch the thermal heating system concept. Going forward with a solar photovoltaic system I found that it would cost around \$8 to \$10 per watt, and since I needed approximately 4000 watts for my home, that translated into a \$40,000 cost. No problem I thought, I'll just subtract the government sponsored incentives that I've been hearing so much about, which I'm told amount to roughly a 50% savings. As it turns out, those incentives are actually tax credits from the state and federal government, which means I need to fork over the cash out of pocket first. Wait, I just found out that the cost so far does not include installation, and oh, by the way, clay tile roofs require special installation procedures at additional cost. Now I'm really starting to worry. I do a quick calculation as to the expected payback interval based on my monthly utility bill and find that I can expect to break even in about thirty years. That's just about the time I will need to replace my roof again.

Well, there goes the new Prius. Actually I found out that many of the hybrid vehicles carry a \$5,000 - \$7,000 surcharge that is added on to the vehicle's purchase price and the tax incentives only apply to a very few models, which achieve extraordinarily high fuel mileage. The lesson learned from all of this is that it's not always easy or cheap to "GO GREEN": I guess I'll just have to rely on an upturn in the economy to build up the ol' 401K account. But that my friends, is another story.

Fortunately for our wastewater facilities, there are actually programs available for energy management and renewable energy opportunities, which can result in tangible savings. A fantastic opportunity to learn what programs are available through your local utility provider, and "how does your facility rate

when it comes to energy usage and efficiency?”, is being offered free of charge, this June 23rd at the Southern California Edison, Customer Technology Application Center in Irwindale, CA. The Workshop is titled, **Innovative Energy Management Workshop**, and is being sponsored by USEPA with co-sponsorship from SCAP. If your agency has not already benchmarked your treatment facilities’ electrical performance, then I strongly urge you to attend. Apart from the obvious benefits of obtaining an Energy Star Rating, we will have utility representatives from Southern California Edison and San Diego Gas & Electric available during breakout sessions to discuss incentive programs and sign ups for free energy audits. EPA staff will also be available to provide interactive instruction on applying energy management system (EMS) approaches to reducing energy usage. Registration is limited to a first come basis, so be sure and sign up early if you are interested. Further information can be found on the USEPA website at <http://www.epa.gov/region09/waterinfrastructure/training/energy-workshop/>.

Disappointedlly Yours,

John Pastore, Executive Director

Committee Reports



Air Quality

By Chair Kris Flaig
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My hat is off for Dan McGivney and his several years of faithful service as Chair of this committee. Although I’ve seen Dan in action only since July of last year, he has become a role model for me as I take on the responsibilities of this position. Looking back at his columns and his ability to be on top of so many issues at every meeting, I can see that his shoes are far larger than previously disclosed. A few things that may have enabled Dan to be on top of things are the incredible assistance of John Pastore, SCAP Executive Director, and Greg Adams, Air Quality Committee Vice Chair, as well as the faithful followership of this committee.

During my first few months as Chair, it has occurred to me that, in addition to the increasing load that we all feel at our paying jobs, this position also requires a certain amount of attention and organization. It also became apparent that most of the Air Districts pursue, from time to time, many of the same objectives, whether these be increasing or establishing fees, fugitive dust or PM permitting, VOCs, diesel engines, ICEs, portable sources, testing methods, etc. As only one person, I can be on top of only so much. But, hopefully, as your Chair, I can continue to propose an agenda each month that prompts helpful discussion. As each attendee to the SCAP Air Quality Committee has a stake in the progress of this Committee, I hope

that I can ask for small contributions for the SCAP newsletter or follow-ups for future meetings. These opportunities for collaborative efforts will, I hope, continue with the purpose of informing SCAP members who cannot attend every meeting, as well as develop the esprit de corps of those who take the time to pen a few words or to develop a greater understanding on a specific issue or task. Several such volunteers have graciously stepped forward for the current month.

Air quality issues surround us. And, the technical and logistical challenges are geometrically compounded by the AB 32, other climate change challenges, and the economy. The normal Air quality issues that SCAP is following include those from all the AQMD’s and APCD’s. Most active, of course, is the SCAQMD, whose current issues include PR 317, which will be heard in June, Regulation XIII Priority Reserve lawsuits, the continuing saga of Rule 1110.2, and the 10% Bio-gas Permit Rule.

Although there seems to be a dearth in activity outside the SCAQMD this month, there are plenty of notes to be made. The Antelope Valley AQMD considered the Rule 1133, Composting and Related Operations, Staff Report at their March meeting. Air emissions related to composting seems to be a growing concern in Southern California. The Mohave Desert AQMD Board is touring several facilities in lieu of taking Board Action: High Desert Power Project, TXI, Riverside Cement, Fort Irwin National Training Center, Stirling Solar Plant, Pacific Gas & Electric, and MWD Gene Pumping Plant. The Imperial County APCD has scheduled workshops on PR 310, Operational Development Schedule Fee, and an Amendment to the Imperial County CEQA Air Quality Handbook for

August. The San Diego APCD will be conducting a workshop on PR 66, Miscellaneous Surface Coating Operations and other Processes emitting Volatile Organic Compounds, on May 6.

The Santa Barbara APCD is working on three proposed rules, one of which may be interesting to POTWs: Rule 345 Fugitive Dust – Construction and Demolition. The Ventura County APCD plans to review several fees during 2009, including PR 42, Permit Fees, and PR 47, Source Test, Emission Monitor, and Call-Back Fees.

In addition to the several continuing air quality issues in each district, the AB 32 and climate control issues continue to mount with not one but several State agencies proposing various regulations. To address these many issues, the CWCCG is beginning to meet monthly, immediately following Tri-TAC, hopefully with conference call capability. As the next such meeting is May 14 at OCSA, chairing this meeting lies with SCAP, and an agenda will be forthcoming. The most pressing issue has been to solicit funds and put out an RFP for a highly experienced and expert consultant in air quality, who can easily engage State and Regional regulators and decision makers on the various components of AB 32 and climate change related proposals. The next most crucial task will be to establish and continue a meaningful agenda.

Meanwhile, the BACWA, CVCWA, and SCAP Air Chairs and Executive Directors, will be working together to ensure the AB 32 and climate change work continues, because, if we don't, no one will. Not even the few largest POTWs in California possess the necessary resources to appropriately address AB 32 and climate change issues. This effort is perhaps akin to nothing we have seen since implementation of the CAA or CWA. The regulatory and legislative proposals adopted during the next two years will surely play a major role in guiding our agencies' budgets and work plans for the coming decade.

Whether an agency wants to participate (or not!) in a Cap & Trade program, or would like to have some input on how greenhouse gases are monitored and reported, this is the time for each agency to step up and donate a few shillings to support the CWCCG. An ounce of gold spent now will certainly be more prudent and cost effective than a pound of the lustrous metal spent three years from now.

If you have any comments, questions, criticisms, observations, or miscellaneous notions, please address them to me at: kris.flraig@lacity.org.

Imperial County APCD

www.co.imperial.ca.us

Imperial County APCD is currently in the process of developing two State Implementation Plans (SIPs) dealing with the formation of ozone and particulate matter of 10 microns (PM10). Both plans have been submitted to USEPA and were required due to Imperial County's non-attainment status for these constituents. ICAPCD has posted timeline schedules for both Ozone and PM10 implementation on its website.

Also required is the submittal of a Monitoring Network Plan, which is currently in the draft stage and will be available for public review shortly. Anyone interested in obtaining an advance copy can contact the ICAPCD office at (760) 482-4606.

The ICAPCD Board of Directors voted unanimously on November 6, 2007 to adopt the Imperial County CEQA Air Quality Handbook, which is available on the County of Imperial's website.

The most recent meeting of the SIP Working Group was held on March 25, 2009.

There are currently no public workshops or hearings posted on the District's website for May.

Mohave Desert AQMD

www.mdaqmd.ca.gov

For those interested in solar power, the MDAQMD website includes a real time display of daily and yearly solar power information from within the district, as well as the amount of carbon dioxide saved.

MDAQMD is advising that an Enhanced Phase II vapor recovery (EVR Phase II) system must have been installed by April 1, 2009 for **all** Gasoline Dispensing Facilities with underground tanks, as required by State Law.

Individual presentations from the recently held 2008 CDAWG conference are available for viewing on the MDAQMD website.

There are currently no public workshops or hearings posted on the District's website for May. The meeting of the MDAQMD scheduled for May 25, 2009 has been cancelled. The next meeting is scheduled for June 22, 2009.

San Diego APCD

www.sdapcd.org

San Diego APCD reports it has completed and submitted its Ambient Air Monitoring Network Plan (AMNP) for 2007 and a copy can be obtained from their website. SDAPCD will be required to submit an Air Quality Plan to EPA in 2013 outlining the emission control regulations necessary to bring the entire region into attainment.

SDAPCD has added a custom Google search engine exclusively for their website and also offers an interactive air pollution simulator program called **Smog City 2**. This program will allow the user to make decisions that affect the air quality and can then view the resulting changes that occur.

SDAPCD has recently revised the vapor recovery notification and test results forms which are used by Gasoline Dispensing Facility (GDF) operators and their contractors to record test results for engineering startup/annual compliance testing. Forms are available on the SDAPCD website.

SDAPCD has announced that it is sponsoring its 10th **Annual Lawn Mower Trade-In Event** on Saturday, May 16th at 8:00am in the north parking lot of the County Administration Center, 1600 Pacific Highway.

On March 25, 2009, SDAPCD adopted Rule 69.2.1 SMALL BOILERS, PROCESS HEATERS, AND STEAM GENERATORS, which becomes effective on March 25, 2010.

Santa Barbara APCD

www.sbacpd.org

The Santa Barbara APCD reports that they have a new fee schedule in effect as of 7/01/08, which can be viewed on their website. SBAPCD also reports that they are working with CAPCOA planning managers to develop GHG emission thresholds for CEQA reviews of new projects.

The SBAPCD has announced it will be conducting meetings in the future to discuss the following Rules:

- Rule 321 (Solvent Cleaning Machines and Solvent Cleaning)
- Rule 345 (Reserved)
- Rule 334 (Control of Hexavalent Chromium Emissions from Chrome Plating and Chromic Acid Anodizing)

The SBAPCD Board will be conducting a public hearing on May 21, 2009 to consider the proposed FY09/10 Budget, which is scheduled for adoption at the June 18, 2009 Board meeting.

Ventura County APCD

www.vcapcd.org

VCAPCD currently has application forms available for the Carl Moyer Program. The program will provide approximately \$2 million of grant funds for projects within Ventura County. The grant funds are available to qualifying owners of heavy-duty diesel powered equipment that want to reduce air pollution by upgrading or replacing their present equipment.

The VCAPCD has a link on their website to a large screen format film entitled, "**AIR-The Search for One Clean Breath**", which was funded by the USEPA and produced by the VCAPCD. Information about the film can be obtained at www.AirTheFilm.org.

The VCAPCD held an Advisory Committee meeting on April 28, 2009 to consider input on proposed Rule 55.1 Paved Roads and Public Unpaved Roads, and proposed Rule 55.2 Certified PM-10 Street Sweeping Equipment. The VCAPCD also conducted a public hearing on April 14, 2009 to consider Rule 42 Permit Fees. The proposed 3.5% increase to permit renewal fees is expected to become effective July 1, 2009.

South Coast AQMD

www.aqmd.gov

Priority Reserve Lawsuits and Related Matters by Greg Adams

On May 5, 2009, Judge George Wu of the United States Central District Court is scheduled to deliver his decision on whether or not to grant the SCAQMD's motion to dismiss the NRDC challenge on the validity of the credits contained in the SCAQMD emissions banks. If the judge does not dismiss the action, then the judge will entertain motions from a variety of interested parties to intervene in the ensuing court deliberations, including merchant power plants and investor-owned utilities, several SCAP member agencies and SCAP itself, if agreed to by the other parties.

As to the California trial court CEQA actions, staff hosted a public scoping meeting on April 8, 2009 to review the scope of the CEQA work envisioned by staff for Proposed Rule 1315 and Proposed Amended Rule 1309.2. The proposed CEQA re-work is in direct response to Judge Ann Jones' order issued on November 3, 2008. The proposed scope of work does not address Rule 1309.1 (Priority Reserve) at all. PAR 1309.2 (Offset Budget) is being modified to be consistent with the SCAQMD's position that thermal power plants should not have access to any credit banks including the offset budget bank which has yet to kick in. At least two commenters at the workshop thought that the CEQA documents should be addressing the thermal power plants as alternative projects. Staff was taking this suggestion under advisement. Staff was of the opinion that renewable energy power projects of any size could debit the Offset Budget account as well as thermal plants less than 50 MW. With the SCAQMD CEQA GHG threshold in effect, the proposed CEQA analysis must include an evaluation of the greenhouse gas aspects of the project.

An appeal of the Judge Ann Jones' action has been filed for a while with the California Court of Appeals but no briefing schedule has been established. A new motion to re-consider and the many declarations from impacted agencies and businesses that the SCAQMD has collected are awaiting further, possibly quicker, actions on proposed legislation by the SCAQMD.

On an independent track to get around the current permitting moratorium at the SCAQMD, on April 3, 2009, the SCAQMD Board approved introducing SB 696 (sponsored by Senator Rod Wright). The bill would remove the redundant CEQA requirement on certain, date-specific versions of SCAQMD rules and thereby allow permits to be issued to essential public services and small businesses. Another component of the bill would allow thermal power plants (electric generating facilities or EGFs) to debit the Priority Reserve, after complying with several significant requirements including paying substantial fees, having signed power contracts in place, and after the California Energy Commission performs a "needs assessment" similar to the analysis they did pre-deregulation era. The EGFs would also be required to service only native load and to demonstrate that they did not interfere with ambient air quality standards.

On April 21, 2009, the LA County Board of Supervisors, after delaying the issue for one week, considered a motion not to support SB 696, which passed 3-2. There was much testimony on the subject marked by misstatements and misunderstandings. SCAP sent a letter to the individual members of the

Board of Supervisors in support of SB 696. The SCAQMD has launched a major lobbying effort to get the bill through and SCAP has been asked to participate.

SCAQMD Proposed Rule 317 (Clean Air Act Non-Attainment Fees) by Greg Adams

After a significant lobbying effort and extensive testimony at the April 3, 2009 SCAQMD Board meeting, Supervisor Bill Campbell introduced a motion that directed the staff to a) return to the June 5 Board meeting with a revised proposal that included an analysis of the legality of the BACT exemption b) include BACT language similar to that implemented by the San Joaquin Valley APCD [their "clean unit" exemption] and c) exclude the student "T" analysis and instead use the EPA guideline for looking back at the [average of] the two highest in past ten years. The last part of the Supervisor's motion dealt with how the funds that were collected from PR 317 fees would be allocated. First, they would be spent for additional controls at the respective facility; secondly, they should be used to improve the environment around a permitted facility; thirdly, if any funds were left over after that, they could be used by the permittee to improve other permitted operations under their control in the District and fourthly, they could be utilized in the fashions proposed by the staff to improve air quality. Staff clarified during the Board action that BACT was that which would exist in 2010 thus greatly confounding the issue for those facilities "near" BACT.

The Clean Air Act Advisory Committee (CAAAC) Section 185 Task Force is meeting in Washington D.C. on April 30 to refine a package of flexibility options that they will then bring to the full CAAAC who hopefully will forward them on to EPA for action. One of the goals of the Southern California contingent of the workgroup is to make sure sufficient flexibility exists to embrace the SCAQMD Rule 317 program as articulated by Supervisor Campbell. The full CAAAC meets on May 14.

MISCELLANEOUS GHGs by Greg Adams

The California Air Resources adopted the Low Carbon Fuel Standard on Thursday April 23, 2009 which mandates a 10% reduction in "carbon intensity" of California transportation fuels by 2020. The rule offers significant potential opportunities for the wastewater industry to create waste-derived alternative fuels to be used as additives in the transportation fuel markets because of their very low carbon footprints, in general. Compliance with the underlying fuel quality standards for the additives remains an issue however.

California Wastewater Climate Change Group (CWCCG) by John Pastore

Approximately 2 years ago, SCAP, BACWA (Bay Area Clean Water Agencies) and CVCWA (Central Valley Clean Water Association) formed a statewide working group known as the California Wastewater Climate Change Group (CWCCG) for the purpose of:

1. Developing wastewater specific emissions protocols for wastewater treatment plant processes.
2. Developing priorities and implementation plans to respond to reporting and emissions reduction requirements that CARB will develop for the WWTP industry.
3. Developing strategies to address other utilities and sectors connected to the WWTP industry.
4. Positioning the WWTP industry for carbon trading.

Membership to CWCCG is currently made up of 42 public member agencies (12-Tier 1 and 30-Tier 2) from the 3 regional wastewater organizations. A tiered membership fee structure was put in place consisting of voluntary contributions of \$10,000 for Tier 1 participants and \$500 each for Tier 2 participants. Tier 1 status entitles the participating agency to be a voting member of the Steering Committee and be involved in the decision making process. Tier 2 status allows the participating agencies access to all meetings, conference calls and documents produced by the group, but no voting rights. Approximately \$137,000 was originally raised to fund the first phase of work, which resulted in a Discussion Paper for a Wastewater Treatment Plant Sector GHG Emissions Reporting Protocol prepared by CH2MHill. The remaining funds were spent towards consultant assistance in coordinating and attending meetings, conference calls, formulating correspondence, and advocating policy and regulatory direction between CWCCG members, CARB, the CA Climate Registry (CCAR), and the SWRCB.

Through the diligent effort of its members, the CWCCG has now become a recognized advisory group to the state regulatory agencies on all climate change issues. The CWCCG Steering Committee is now meeting monthly due to all of the activity brought upon our industry because of the AB32 regulations and CARB's Scoping Plan implementation and does not want to lose the momentum gained by its previous work. The Steering Committee now finds it necessary to again approach the members of the 3 regional wastewater organizations for additional funding to continue the next phase of work. The CWCCG funding request

letter can be viewed at: <http://www.scap1.org/default.aspx>, which describes the necessity for the next phase of funding.

SCAP is assisting by sending this request for funding out to all of our members for their consideration. For both those agencies that are CWCCG members and would like to continue, as well as those agencies that did not participate in the first go around but would now like to get involved--the new Tier 1 funding level is \$10,000 and the Tier 2 funding level is \$1,000 per agency. The CWCCG's goal is to raise \$151,000 to continue this necessary and important work. For those agencies that wish to be involved with the group but are not able to participate financially, the CWCCG is accepting commitments for **in-kind** staff services to assist with administrative type duties.

If your agency would like to participate and make a voluntary contribution or provide in-kind services, please let me know and I will follow up with an invoice form SCAP. Also, please indicate if your contribution would be coming from current fiscal year funds or next fiscal year funds.



Biosolids

By Chair Mike Sullivan
msullivan@lacs.org

Cross Media Issues by Matt Bao

For over a year now, members of SCAP, CASA, and others have made efforts to mitigate the cross media issues that arise from regulatory rulemaking. Several meetings have been held with representatives from Cal EPA and various Air Districts, Regional Water Quality Control Boards, CalTrans, and USEPA to address cross media issues, discuss examples of what regulations are currently causing these issues, and develop processes that can be implemented to avoid them. It has been noted that communication within, and among, the various regulatory Boards has greatly improved since the enactment of The Global Warming Solutions Act (AB 32, 2006). Capitalizing on this timing, an initial questionnaire to be completed by a regulatory authority at the onset of rulemaking efforts, and a checklist to be consulted as the rulemaking proceeds have been developed. It has been recommended that these documents be adopted by

CARB, CIWMB, and SWRCB and incorporated into regulatory training and guiding principle documents.

On April 24, 2009, a letter to the Cal EPA Boards was sent on behalf of the Clean Water Summit Partners recommending the early identification and early mitigation of cross media issues, and the incorporation of the cross media documents that were developed.

San Luis Obispo Ordinance to Establish Regulations for the Land Application of Biosolids by Matt Bao

San Luis Obispo County released a draft ordinance in 2008 that would replace the County's interim biosolids rule that nearly eliminated the use of biosolids for land application. This draft ordinance would limit the land application of biosolids to exceptional quality (EQ) biosolids only, and limit the total land application of EQ biosolids in the county to 1,608 cubic yards in the first year (with provisions to allow increases in subsequent years based on in-county population levels).

In mid-April, San Luis Obispo County Supervisors voted to extend the county's interim biosolids ordinance by 4 years beyond the upcoming date of the interim ordinance's expiration, which was February 2010. The interim ordinance allows the land application of biosolids within the county to be limited to 1,500 cubic yards per year. County Supervisors directed staff to continue efforts in developing a permanent ordinance, but to also search for funding to develop an EIR that would implement such an ordinance. It is anticipated that an EIR may cost between \$150,000 and \$250,000, and may take at least a year to develop, but the county faces challenges in funding the EIR due to a multi-million dollar budget deficit.

Update on Local Biosolids Projects by Matt Bao

The City of Los Angeles' Terminal Island Renewable Energy Project (TIRE) has been named as a semi-finalist for the 2009 Award for Innovations in American Government. The Ash Institute for Democratic Governance and Innovation presents the award every year at the John F. Kennedy School of Government at Harvard University. As a semi-finalist, TIRE is recognized as one of the top 50 programs representing the best practices in government innovation on City, county, tribal, state and federal levels.

April Biosolids Committee Meeting by John Pastore

The April 16th Biosolids meeting was held at the Inland Empire Regional Composting Facility in Rancho

Cucamonga. The meeting featured a tour of the state of the art composting facility, which is jointly owned and operated by the Inland Empire Utilities Agency and the Sanitation Districts of Los Angeles County. This facility features an aerated static pile composting process within a fully enclosed building. It also incorporates a subsurface aeration system (up to 800,000 cfm), 3 acres of biofilters, and solar panels that can generate up to 1 megawatt of power. The IERC facility is currently running at full capacity and is processing 150,000 tons of biosolids annually. The process requires approximately 21 days of active composting screening and approximately 30 days of curing time. The finished product that we observed was of excellent quality and sold in bulk to landscapers, farms, and in bags for home use. Our thanks to our tour guide, Jeff Ziegenbein from IEUA, and Mike Sullivan from LACSD for arranging this amazing facility tour.



Collection Systems

By Chair Ralph Palomares
rpalomares@etwd.com

SCAP Collection Systems Committee Report by Ralph Palomares

It's April and that means the Water and Sanitation Oscars will be given out at the Annual CWEA Conference held during the last week in April in Palm Springs, CA. I will be giving out the Collections Awards at the Collections Breakfast meeting, where we are expecting to have about 90 in attendance, many of whom are also SCAP members. Should you win an award for your agency, I would very much like you to consider making a presentation at a future SCAP Collections meeting in order to show what your city or agency did to win one of these prestigious awards, especially if you plan on going to WEF later on for further award.

This is my 23rd annual CWEA Conference that I have attended since 1986, with the first one being held at Hotel Circle in San Diego, CA. Although, the attendance and conference agenda would be a drop in the bucket compared to today's events, but nonetheless, I was asked to get involved and at first I was a little "shy"—yes, I know it's hard to believe, but even I was a little shy when I started off attending meetings and being on committees. Back then, I just listened and now, 23 years later, the rest is history. As

I finish my CWEA Collections Committee and SARBS Board, WDR, and SCAP obligations, I plan to still be around to help out those groups that may need my expertise during the first part of 2010. I have spoken at Tri State, CWEA and at local sections on topics from FOG to Source Control, from calcium deposits to safety rules, as well as regulations that affect each and every one of us in this industry. I can still recall the early days when we would just take off our shirts and jump in the hole to fix what ever needed to be repaired, but given today's rules and regulations that would never happen.

As you know, we have a great number of rules and regulations for our industry, including the new SSO/WDR rules, and we continually try to cover as many of these as we can at our quarterly SCAP meetings. As I have mentioned numerous times before, there are a lot of collections oriented committee meetings being held throughout Southern California and none of us have the time to attend all of them, but if you can afford the time, I strongly urge you to attend our next SCAP Collections meeting. The next meeting is scheduled for May 13th at the City Of Riverside' Water Quality Control Plant and will feature an update on the WDR Update from Russell Norman of the SWRCB, a demonstration of a quick curing technique using ultraviolet light on cured in-place pipe liner, a presentation on sewer hazards, and a chance to learn about some of the City of Riverside's top notch collection system programs like the CADME database, IW Database and SSO-299 Response Plan. I will also be discussing the CWEA Annual Conference award presentations and will be looking for any feedback from those of you who also attended.

Our Industry is the one of the safest in the country, due primarily to all of the training we have and now with the new threat of the Swine Flu pandemic, let's continue to be conscientious about always washing our hands during the work day with warm water and soap. As a matter of fact, today I just learned that there is two new cases reported in Palm Springs, so I guess I won't be shaking any hands at this year's conference! Be safe and I will see you all next month.

Voluntary Sewer Spill Prevention Program by Sam Espinoza

On April 1, 2009, representatives from the Los Angeles County Board of Supervisors, the Los Angeles County Department of Public Health, the City of Los Angeles County Bureau of Sanitation, and the Sanitation Districts of Los Angeles County met to discuss the ongoing development of a workshop to be held at the Los Angeles County Department of Public Works' central office in the City of Alhambra in June or July

2009. The exact date of the workshop has yet to be determined. The workshop will include opening remarks by one of the Los Angeles County Board of Supervisors. A presentation by the Los Angeles County Auditor Controller's Office will focus on their findings with regard to sewage spill notifications in Los Angeles County. They will also discuss the Board motion that was intended to ensure cooperation among local jurisdictions in an effort to further reduce the number and volume of sewage spills originating in Los Angeles County. The Los Angeles County Department of Public Health will offer a presentation on the health risks associated with sewer spills, on how a decision is made to close a beach, the importance of timely notifications and what happens to the spill data after it is reported. The Santa Monica Bay Keepers and Heal the Bay will also be invited to present on their views with regard to the regional impacts of sewer spills and beach closures. The Los Angeles County Regional Water Quality Control Board will present on sewer spill reporting requirements as well as on enforcement actions and penalties for noncompliance. Finally, the Los Angeles County Department of Public Works, the City of Los Angeles Bureau of Sanitation, and the Sanitation Districts of Los Angeles County will be involved in a panel discussion on lessons learned with regard to sewer spill response, notification and reporting.

This particular workshop will be tailored specifically for those collection system operators within Los Angeles County but will be open to all interested parties and should offer a unique opportunity to hear from various organizations regarding the topic of sewage spills.

What's the character of your FOG? by Robert Kreg

One of the elements of the Sewer System Management Plan (SSMP) required by the State Water Resources Control Board's General Waste Discharge Requirements for all publically owned sanitary collection systems comprised of one or more miles of pipeline is a fats, oils and grease (FOG) reduction program. This element is unique in that it is the only element that has two parts. The first part is to determine if an agency has a problem with FOG and, if so, the second part is to develop and implement a FOG reduction program or include a statement that the agency does not have a problem with FOG within its collection system.

FOG is normally discharged into the collection system as a by product of food preparation. Restaurants and other facilities commonly referred to as food service establishments (FSEs), that prepare food for groups of people are the biggest single source of FOG discharge. But FSEs are not the only source of FOG.

Some level of FOG is generated from each household connected to the collection system.

Numerical limits on FOG discharge were not incorporated into the WDR's development as each collection system is unique in the amount of FOG that can be handled without causing SSOs. An easy way to determine the effect of FOG on the system is to conduct a FOG Characterization Study. Properly conducted, a FOG Characterization Study will show which areas of the collection system are subject to FOG problems and from where the FOG is being generated. A FOG Characterization Study can be conducted in-house or out sourced to a consultant. Several of SCAP's associate members are capable of conducting such a study. A FOG Characterization Study can be conducted incorporating a sophisticated GIS system or a simple Excel spreadsheet and paper maps. What ever method that is used, the study can be utilized to create and justify a new or revised FOG ordinance and/or FOG reduction program. The FOG Characterization Study is also a useful tool in measuring the ongoing effectiveness of a FOG reduction program indicating areas that are being effectively controlled as well as areas where additional control is needed.

An easy starting point for conducting a FOG Characterization Study is a careful review of passed spill and line cleaning reports paying particular attention to the occurrence of FOG in these reports. Also review hot spot or enhanced maintenance areas for FOG related problems. If CCTV inspection videos are available, review the areas where FOG related problems or buildups have occurred. Incorporate the findings into the GIS or in an Excel spreadsheet. This will give an indication of what areas within the collection system are subject to FOG buildups or SSOs. The FOG prone areas can then be displayed on a GIS layer or color coded on a paper map to give a visual representation of sections of the collection system that are subject to FOG problems.

The next step is to determine the source of the FOG discharges. A list of establishments that sell or prepare food can be requested from the local health care agency. Many times such lists will already be in an Excel format and will contain current information about the establishment's business practices including location and contact information. Establishments that only sell pre-prepared food such as mini marts and do not engage in any other activities that generate FOG can be excluded as de minimus FOG dischargers. The remaining establishments will be those FSEs that could be a FOG generating source. Plot these establishments on the GIS layer or color coded on a paper map. Many times FSEs tend to be clustered in

particular areas of the collection system. To precisely determine who is discharging FOG into the system utilize CCTV. When using CCTV to inspect those areas where FOG is suspected of being discharged pay particular attention to the FSE's service lateral. When laterals are found that contain evidence of FOG discharge, the video or still photographs can be useful in demonstrating to the property owner that a grease removal device needs to be install or if one is already installed it is not functioning properly. When FOG prone areas are in residential portions of the collection system and not related to the activities of FSEs, CCTV can be used to determine which households are the greatest offenders. It is not uncommon for densely populated areas or areas with a number of multi-family residential units to have FOG discharges similar to FSEs. The FOG Characterization Study will identify these areas so they may be targeted for public outreach on proper household FOG disposal practices.

As the collection system ages, FSEs relocate or new areas are developed, periodically updating the original study will provide information for gauging the continued effectiveness of the FOG reduction program. It can also target areas for program improvement and help keep the sewers fat free.



Energy Management

By Chair Andre Schmidt
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April Energy Management Committee Meeting by John Pastore

SCAP's Energy Management Committee held its Spring 2009 meeting on April 14th at the City of Thousand Oaks WWTP in Camarillo, CA. The meeting was hosted by fellow SCAP Director, Chuck Rogers, who not only provided an outstanding lunch for everyone but presented an informative overview of their 14 mgd wastewater treatment plant's Energy Management Plan. The plan included a variety of ways in which the City has minimized energy usage and maximized operational efficiency, by such means as, cogeneration, solar power, high efficiency blowers, lighting, and restaurant grease disposal. The one thing that resonated throughout Chuck's presentation was that he and the City are continuing to look for innovative ways to pull the facility completely off of the power Grid. The facility currently produces more than

1 megawatt of electricity, which accounts for approximately 60% of the facility's daily electrical needs.

Other presentations were made by Jeff Bartel, from U.S. Energy Services, Inc. concerning insights into how purchase power agreements between private companies and public agencies work and the benefits derived from these types of contracts. He also provided a detailed analysis of the projected savings that the recent agreement with the City of Thousand Oaks will result in.

Lastly, Mr. Pramod Kulkarni from the California Energy Commission, who came down from Sacramento for this meeting, discussed his work with recent legislation, AB1613 and AB 2791, that encourages cogeneration at wastewater treatment plants and requires California utilities to provide a feed-in tariff for any new system under 20MW that meets eligibility requirements. During the presentation it became clear that the present legislation is too restrictive and does not capture the needs of our POTWs. For example, program eligibility requires that the POTW deliver its excess power to the Grid. It was subsequently explained to Mr. Kulkarni that only a very few POTWs are large enough to produce sufficient electricity from cogeneration to sell to the Grid, and that in-fact, most POTWs are not able to generate enough electricity to run their entire plant.

Mr. Kulkarni was extremely grateful for this type of information and vowed to work through SCAP and its members to present this information at future legislative meetings with the hope of effecting legislative changes that will make future programs more useful to our POTWs.

Upcoming Innovative Energy Management Workshop by John Pastore

Is your agency doing everything it can to save energy and increase electrical efficiency at your wastewater treatment plant? If not, then SCAP's upcoming Innovative Energy Management Workshop is for you. SCAP's Energy Management Committee is jointly sponsoring an upcoming one-day, energy management workshop this summer in Los Angeles for the benefit of our POTW agencies. The workshop will be conducted by the USEPA and supported by the utility companies, particularly Southern CA Edison, Sempra Utilities, San Diego Gas and Electric, and the CA Energy Commission. The workshop is scheduled for June 23rd in Irwindale, CA and will be limited to a maximum of 2 people from each agency, up to a total attendance of 50 participants. The workshop will afford the participants the opportunity to benchmark their

POTW facility and obtain an Energy Star rating using EPA's model software. Computer workstations will be available to the participants, who will be guided through the benchmarking process by on-site EPA staff. The workshop will also include presentations by, and consultations with, the Utilities concerning energy auditing and energy savings recommendations. Pre-registration will be required due to the limited class room size and a prerequisite phone interview session with EPA staff will be required to collect the agency's electrical usage data ahead of time. The idea being to have each agency's information pre-loaded into the model prior to the workshop for better efficiency. SCAP will be sending out a formal notice of this workshop very shortly. For further information, please contact the SCAP office.



Presentation by Jeff Bartel, U.S. Energy Services, Inc. on purchase power agreements.



View of Hill Canyon WTP solar panel array.



Hill Canyon WTP's high efficiency blowers.



Water Issues

By Chair Gus Dembegiotes
Gus.dembegiotes@lacity.org

Statewide General Permit for Landscape Irrigation Uses of Municipal Recycled Water by Gus Dembegiotes

As mentioned in last month's column, on March 27th the State Water Resources Control Board (State Board) released a "Notice of Opportunity for Public Comment" regarding its proposed adoption of a resolution approving a Mitigated Negative Declaration covering General Waste Discharge Requirements for landscape irrigation uses of municipal recycled water and proposed adoption of the General Permit. The WaterReuse Association and other Stakeholders have been working with State Board staff in an attempt to have several provisions revised in the General Permit dealing prohibitions of use and monitoring and reporting. The State Board is requesting public comments on the General Permit by noon on April 27th. California Water Code section 13552.5 requires the State Board to adopt a Statewide General Permit for Landscape Irrigation Uses of Recycled Water by July 31, 2009. More information on the General Permit can be at:

http://www.swrcb.ca.gov/water_issues/programs/water_recycling_policy/docs/notice_landscape042708.pdf

California Clean Water State Revolving Fund (CWSRF) by Gus Dembegiotes

On April 17th, the State Board released its amended CWSRF Intended Use Plan (IUP). The State Board amended its CWSRF IUP to apply for 2009 American Recovery and Reinvestment Act (ARRA) funds. The State Board intends to distribute \$280 million of American Recovery and Reinvestment Act funds as follows: 25% as grants to small disadvantaged communities, 25% as grants to projects that lost previously approved State Board grant funding due to the State's budget constraints; and the balance to be competitively distributed as loans. Several agencies are still lobbying to have a greater amount of these ARRA funds distributed as grants instead of loans. The CWSRF Program provides financing for the construction of wastewater treatment and water recycling facilities, implementation of nonpoint source projects and programs, and development and

execution of estuary comprehensive conservation and management plans. The amended CWSRF IUP can be found at:

http://www.swrcb.ca.gov/water_issues/programs/grants_loans/srf/docs/finalamended_0809_arra_iup_040309.pdf

The State Board also announced that due to the limited amount of ARRA funds and the short time frame for processing applications, it would group and process applications received as of April 30th. Applications received after April 30th could still be inputted into their FFAST system but would be held for regular SRF processing after ARRA funds are depleted. Examples of Expanded Use Projects are implementation of nonpoint source (NPS) projects and programs, development and implementation of Estuary Comprehensive Conservation and Management Plans, and Storm water treatment. The State Board Notice can be found at:

http://www.swrcb.ca.gov/water_issues/programs/grants_loans/srf/docs/eup_app_deadline.pdf

California Ocean Plan by Gus Dembegiotes

The State Board provided notice of a public hearing on June 16th in Sacramento to receive public comments and to consider adopting proposed "non-substantive amendments" to the California Ocean Plan (Ocean Plan). The Ocean Plan establishes water quality standards for California's ocean waters and provides the basis for regulation of wastes discharged into the State's near-coastal ocean waters. On June 26, 2007, the State Board held a public scoping meeting to seek input on proposed amendments to the Ocean Plan. The State Board is proposing the following amendments to the 2005 Ocean Plan: 1. Clarify that metals are expressed as total recoverable metals; 2. Remove Section III (F)(1) on compliance schedules, which is "outdated and unnecessary"; 3. Correct toxicity definitions and references in Appendix 1; 4. Include maps of California's ocean waters, bays, and estuaries; and 5. Update the list of exceptions in Appendix VII in order to include: exceptions for discharges to Area(s) of Special Biological Significance, which were approved after the adoption of the 2005 Ocean Plan; the 1979 conditional exception for untreated wet weather discharges from the City and County of San Francisco's combined storm and wastewater collection system, which was omitted from the 2005 Ocean Plan; and the 1988 exceptions for total chlorine residual for nine coastal power plant discharges, which were also omitted. Written comments on the proposed amendments must be sent to the State Board by noon on June 1, 2009. More information can be found at:

http://www.swrcb.ca.gov/water_issues/programs/ocean/docs/oplans/amendments2009/oceanplan_notice2009.pdf

Draft NPDES General Permit for Discharges of Storm Water from Construction Activities by Gus Dembegiotes

The State Board has provided notice that it will hold a public hearing to accept comments on its proposed Draft General Permit for Discharges of Storm Water Associated with Construction Activities (Draft Construction General Permit). On August 19, 1999, the State Water Board adopted the Construction General Permit ([Water Quality Order 99-08-DWQ](#)) for regulation of storm water discharges associated with construction activity which expired August 19, 2004 but remains in effect until a new General Permit is adopted. On June 19, 2006, a panel of storm water experts (Panel) submitted a report to the State Board titled: "The Feasibility of Numeric Effluent Limits Applicable to Discharges of Storm Water Associated with Municipal, Industrial and Construction Activities." The Panel's final report is posted on the State Board Web site at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/numeric.shtml

In March 2007, State Board staff issued a preliminary Draft Construction General Permit and received public comments. In March 2008, State Board staff issued a proposed Draft Construction General Permit and held workshops in Northern and Southern California to receive public comments. In response to comments, the proposed Draft Construction General Permit was again revised and includes some the following changes: Rainfall Erosivity Waiver; Technology-Based Numeric Action Levels; Technology-Based Numeric Effluent Limitations; Risk-Based Permitting Approach; Minimum Requirements Specified; Project Site Soil Characteristics Monitoring and Reporting; Effluent Monitoring and Reporting; Receiving Water Monitoring and Reporting; Post-Construction Storm Water Performance Standards; Rain Event Action Plan; Annual Reporting; Certification/Training Requirements for Key Project Personnel; and Linear Underground/Overhead Projects.

Written comments on the Draft Construction General Permit must be submitted by **5:00 p.m. on June 17, 2009**. More information on the Draft Construction General Permit can be found at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/draft_construction/notice_cgp.pdf

Economic Stimulus Funding -- CEQA Conditions by Shawn Shamlou

California public agencies applying for federal stimulus money available through California's State Revolving

Fund (SRF) loan program must complete extensive environmental documentation to meet the September 2009 application deadline. Known as CEQA-Plus, the requirements are intended to upgrade California Environmental Quality Act (CEQA) documents into documentation satisfying federal National Environmental Policy Act (NEPA) regulations. California's SRF program is partially funded by the U.S. Environmental Protection Agency (EPA) and is subject to federal environmental regulations.

CEQA-Plus documentation includes:

- California Environmental Quality Act (CEQA)
- Federal Endangered Species Act (ESA)
- Federal National Historic Preservation Act (NHPA)
- General conformity rule for the Clean Air Act (CAA)

There are complexities and timelines associated with each of CEQA-Plus' requirements. For example, federal conformity must be addressed for air quality. Also, the endangered species act requires that the applying agency provide species lists, biological assessments and other documentations, as well as confer with the appropriate federal regulatory agencies, such as Fish and Wildlife Service and National Marine Fisheries Services. For further information, I may be contacted at: sshamlou@dudek.com.



Regulatory Affairs

By Mary Jane Foley
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Regulatory Affairs Update by Mary Jane Foley

I have been asked to speak at a workshop on June 3, 2009 regarding streamlining the permit process for water and wastewater projects. I and another former State Waterboard Member will discuss a challenging question: how can streamlining be done while preserving environmental values? So for this May issue of SCAP's Monthly Update, I wish to streamline into this column some topics that I will bring up at the workshop.

First, let's revisit the Governor's State of Emergency Proclamation earlier this year as it relates to California's water supply. "To the extent allowed by

applicable law, state agencies within my administration shall prioritize and *streamline* permitting and regulatory compliance actions for desalination, water conservation and recycling projects that provide drought relief.”

In the past month, CASA, along with SCAP and other POTW Associations, submitted a final letter to all the CalEPA agencies on the Cross Media Checklist that has been a work in progress over the last year. The goal of this checklist is to require CalEPA agencies to talk to each other when they are crafting a new regulation. This might help alleviate the conflicting regulations from water to air to land that occur all too often. So I think the checklist definitely qualifies as an effort towards streamlining between environmental state agencies.

In contrast, the new proposed general permit for landscape irrigation uses of municipal recycled water has **not** made it into my streamline column yet. So far, one of the most burdensome sections of the draft general permit is the requirement for individualized management plans for each site, instead of what the recently finalized Recycled Water Policy specifies: that the plans could apply to multiple sites. The current draft would require monitoring and reporting on a daily basis, weekly site investigations, and an annual report for each use area. This is not streamlining. I live in an area with 3000 reclaimed water areas. The SWRCB staff needs to be reminded of the Governor’s directive.

On another topic, Pete Silva, a former State Waterboard Member and a recent Obama appointee as the EPA Director of Water in Washington is a good thing for California. I know he will be open to streamlining as long as the law is followed.

While on the topic of the EPA, the Center for Biological Diversity has asked EPA to list the ocean as impaired due to carbon dioxide in the atmosphere. EPA is soliciting information on a range of issues, including issues relating to the monitoring of PH. Several SCAP ocean discharge members are working on this. Staying on the topic of the ocean, and reflecting back on streamlining, SCAP was very visible and active in the Marine Life Protection Act process with written and verbal testimony to the Blue Ribbon Task Force Policy Committee for the MLPA. We are seeking a streamlining process, where all the SCAP ocean dischargers are exempt or grandfathered into any new marine life protection regulation, to allow for the continued level of treatment, operations, monitoring and maintenance. SCAP members have been wonderful about providing the necessary information, maps, detail, letters, etc. to help protect our industry. This effort takes about 5 formal days of meetings a

month. But if we are able to preserve our current operations, it is well worth the effort.

Regulatory Help Desk

Having a regulatory problem and want to talk to someone confidentially about what your options are? Helping individual members is one of my charges and a rewarding part of this job. Please feel free to call me at (949) 493-8466, or email at mjfconsulting@cox.net .

Non Sequitur

“I see skies of blue, and clouds of white; the bright blessed day, the dark sacred night. And I think to myself, what a wonderful world.”

- Louis Armstrong, “What a Wonderful World”

Some of our Supporting SCAP Associate Members

