



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

MONTHLY UPDATE

A Message from the Executive Director...

February 2007

Life can really be cruel sometimes. I'm really not what you would call a sports fanatic but I do like my hometown teams. Whether it's college or pro, if it's the local guys, I am into it. Unfortunately, having been born and raised in San Diego (there aren't too many of us natives out there), I'm stuck with very inconsistent sports teams. [Editor's Note: But at least the weather's great.] Case in point, I just finished witnessing the New England Patriots beating my San Diego Chargers in the football playoffs. No Super Bowl for us this year, again! I now know how badly the Chicago Cubs fans must feel. Year after year, no matter how good our team is, it can never seem to win the big one. Nonetheless, good teams pick themselves back up and start all over again the next year. What's that old baseball saying? "Hope springs eternal."

Much in the same way we deal with our wastewater and air regulations. We do our best day after day fighting the good fight and, in the end, we win some and we lose some. I know, stop with the corny sports clichés, but it is the truth and it reminds me of how much admiration I have for our public agency folks who work tirelessly day-in and day-out at studying every new regulation figuring out if they are reasonable and achievable.

For those of you who may not be intimately involved in regulatory compliance at the legislative or state board level, the time and effort spent by agency staff (particularly the larger agencies) studying each new issue is astounding. Once a newly proposed regulation becomes open for public review, whether it's for air, biosolids, collections or water, staff begins the painstaking process of analyzing it to the nth degree. Internal meetings are held where agency staff compare notes and strategize. More meetings usually follow between agency staff and key regulatory staff. More times than not, additional meetings are held with state board members when allowed. [Editor's Note: In most cases, agency staff may not meet with members of the State Water Board on a specific issue if the issue is pending an adjudicative proceeding. This rule is called "Ex Parte" and is found in the State's Administrative Procedures Act.] Then comments are submitted to the regulatory agency during the public review process and, ultimately, a staff presentation is made at the public hearing.

This entire process may sometimes take months or years depending on the complexity of the issue. For example, the recently enacted statewide WDR-SSO process with the SWRCB took well over 3 years to formulate, receive input from the wastewater community and finally be enacted. Even then, like most complicated issues, the phased rollout of these regulations may take additional years to achieve full implementation.

Upcoming Meetings

Air Quality Committee Meeting –
Wednesday, February 15th, 10 am – 12 noon
at LACSD.

**SCAP One Day Specialty Conference
and Associate Members Expo –**
Wednesday, March 7th, 9 am – 3:30 pm, at the
Ontario Convention Center. **Reservations
are required.**

On March 7, 2007, SCAP will be sponsoring a one-day specialty conference that will address many of the new regulatory issues each of your agencies will be facing in the upcoming years. These are issues which will ultimately have a significant effect on all of us whether we like it or not. The idea of this event is to educate our members and introduce them to our committees' efforts in finding workable solutions. As they say, "Forewarned is forearmed." In the very near future, you will begin to receive more detailed information about this conference including registration material. I hope that you will attend and help make this first of a kind event for SCAP a success.

Chargerly yours,

John Pastore

Air Quality by Chair Daniel McGivney

SCAQMD Proposed Amendments to Rule 1110.2

On January 23, 2007, the SCAQMD released the latest draft of proposed amendments to SCAQMD Rule 1110.2. This rule regulates non-emergency internal combustion engines. The SCAQMD has scheduled a workshop for 10 a.m. on February 6, 2007 to take public comment on the proposed rule.

Some of the most onerous requirements include requiring all engines currently permitted with Best Available Retrofit Control Technology (BARCT) standards (36 ppm NOx, 250 ppm VOC and 2000 ppm CO) to meet more restrictive Best Available Control Technology (BACT) standards (11 ppm NOx, 30 ppm VOC and 70 ppm CO); adding new emission limits for engines driving distributed generation (which engines cannot currently attain even with emissions controls); lowering the threshold for requiring a continuous emissions monitoring system (CEMS) [NOx and CO CEMS] from a single engine threshold of 1000 bhp to an aggregated facility total of 1000 bhp, applicable to engines located within 75 feet of each other; increased source testing from every three years to every two years; conducting of testing at 3 load conditions rather than the current single load; self-reporting of emissions and other permit/rule related deviations. Finally, weekly emission monitoring with a portable analyzer of any engine not equipped with a CEMS.

These requirements will add significant capital and O&M costs to any engine operation. Additionally, the increased monitoring will highlight emissions and other permit related deviations, thereby increasing the chances of enforcement by the SCAQMD. The SCAP Air Quality Committee advises any agency that operates engines to review the draft rule (available from the SCAP office) and staff report and to attend the February 6 workshop. Any questions regarding this draft rule may be forwarded to the SCAP Air Committee via the SCAP office.

Committee Chair Contact Info

Air Quality Chair:

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Biosolids Chair:

Karen Soares –
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Collection Systems Chair:

Ralph Palomares –
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Water Issues Chair:

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Latest News on SCAQMD Proposed Amended Rule 1309.1 – Priority Reserve

The latest proposal dealing with the Priority Reserve (from where essential public services and small businesses receive emission reduction credits for fee) would prevent power plants from being constructed in the eastern counties of the air basin in areas of environmental justice concern. Staff has divided the air basin into three zones depending on the level of PM 2.5 (particulate matter with aerodynamic diameters of 2.5 micron or less). Projects in the highest zones would be precluded from using Priority Reserve credits; effectively stopping construction of power plants as there is no other credit alternative. The Air Quality Committee is very concerned that similar constraints could be placed on any credits given out from the Priority Reserve for any type of project, i.e., credits would be distributed depending upon how well your project comported with SCAQMD environmental justice policies.

WERF Study Status

CH2M Hill and King County in Washington State have been Co-Principal Investigators for a WERF project focusing on minimization of odors and corrosion in wastewater collection systems. The project will transfer state-of-the-art technology and information from a literature survey and recent field experiences to collection system owners, designers, and operators on odor and corrosion assessment, measurement, characterization, monitoring, and prevention.

The project will be conducted through a five-step approach.

1. Assembling published and unpublished information in a database of prior research, literature, and gray literature (utility studies).
2. Evaluating the database for quality, accuracy and completeness and identifying potential knowledge gap areas where follow-up research or field studies are needed.
3. Classifying items in the database for information searching purposes and use by collection system owners and designers.
4. Preparing design and operational guidance from the available information. An initial "Plain English" summary guidance manual will be developed as part of Phase 1. This summary manual will highlight available knowledge on collection system odor and corrosion technologies.
5. Developing a collection system assessment tool in Phases 2 and 3 to assist agencies in evaluating their collection system odor and corrosion issues.

The first two steps of the approach were recently completed. WERF identified 13 research gap areas as a result of the literature search. These 13 research gaps were prioritized to a short-list of four research areas that WERF will pursue.

- Improved definition of sewer ventilation to better understand air movement and displacement in collection systems.
- Better definition of the odorous and corrosive compounds found in collection systems.
- Better definition of the treatment effectiveness of liquid and gas phase treatment methods for compounds other than hydrogen sulfide.

- Improved understanding of hydrogen sulfide gas concentration and relation to corrosion rates.

WERF Biosolids Odor Reduction Research

On January 11th, at the meeting of the TRI-TAC Air Committee, chaired by Stephanie Chang of CH2M Hill, at the Ontario Airport Marriott, Ron Hargreaves of LACSD presented a brief summary of the status of the LACSD-CH2M Hill research project on biosolids odor reduction. This project is the third phase in a series of WWTP odor studies funded by the Water Environment Research Foundation (WERF), which began in April 2000 and is in the process of preparing the Final Report for the current Phase 3. The research team has found that the main source of odors in anaerobically digested biosolids are volatile organic sulfur compounds (VOSCs), which are produced by biodegradation of proteins in the dewatered biosolids cake. Approaches to reduce the bioavailable protein that have been studied by the team include better or enhanced digestion, chemical addition, and reduction of shear to the sludge during dewatering and handling. The Final Report will present an Options Summary Chart, which lists all the potential reduction measures for reducing biosolids odors that the research team has assembled for WWTP facilities in both operation and design. Ron handed out copies of a recent December 7, 2006 slide presentation summarizing the project research results at a WERF Program Area Meeting to the nine (9) attendees of the TRI-TAC Air Committee Meeting.

Biosolids by Chair Karen Soares**SAN JOAQUIN VALLEY APCD PROPOSED RULE 4565**

The SJVAPCD held a public workshop on January 11th to discuss Proposed Rule 4565 Biosolids, Animal Manure, and Poultry Litter. The rule impacts facilities in the San Joaquin Valley (including Kern and Kings Counties), where biosolids are land applied, composted, landfilled, or used as Alternative Daily Landfill Cover (ADC). Some of the concerns raised include the fact that the rule would essentially preclude the use of biosolids as ADC within the air basin, and that the timeframe allowed for biosolids incorporation was inadequate. Comments on the proposed rule were due by January 25th. The rule and supporting documents can be found at http://www.valleyair.org/Workshops/public_workshops_idx.htm#r4565.

FLOREZ LEGISLATION – SB 55

State Senator Dean Florez introduced Senate Bill 55, which, if it were passed, would require POTWs to monitor priority pollutants, certify sludge quality, and be liable for any remediation costs associated with reuse or disposal of their biosolids. The bill would also require the State Water Resources Control Board, Integrated Waste Management Board, and the Department of Food and Agriculture to investigate whether the state should adopt standards for pollutants not covered by the EPA 503s, such as Prop 65 chemicals, priority pollutants, pharmaceuticals, personal care products, and endocrine disruptors.

Collection Systems by Chair Ralph Palomares

As my first official act as the new Collection Systems Chair, I would like to personally thank our past Chair, Nick Arhontes, for all of his hard work and support over the past few years. As many of you may know, Nick was the driving force behind the formation of SCAP's Collection Systems Committee and was instrumental in obtaining board approval for including collection system agencies in SCAP's membership. I also want to thank Sam Espinoza of LACSD for accepting the Vice Chair responsibilities and I look forward to collaborating with him on future collections issues this year.

CWEA/SCAP Training

January 4, 2007 was the latest in the series of scheduled training for the statewide electronic spill reporting for Regions 4, 8 & 9. The two sessions were held at the Rancho Cucamonga offices of CDM and were attended by approximately 25 attendees. The next scheduled training will be in Region 3 at Santa Barbara on Monday, February 12, and Tuesday, February 20, at San Luis Obispo. Each of these training days will consist of a morning and afternoon session. Regions 1, 2 & 3 will be required to begin electronic reporting of all SSOs as of May 2, 2007.

In addition to the electronic spill reporting training, CWEA along with its partners, SCAP, CASA, BACWA and CVCWA are in the process of developing additional training for the development of an SSMP. A training manual and program are currently under development with workshops to be held throughout the state as the project is completed. The goal is to offer hands-on training on how to assess your agency's level of compliance with the statewide General Waste Discharge Requirements (GWDR) and how to develop the necessary programs or procedures to attain full compliance. More information will follow as this process nears completion.

SARBS Workshop

On January 18, the Santa Ana River Basin Section (SARBS) of CWEA held its very successful Winter Training Seminar at the Phoenix Club in Anaheim. As part of this seminar, two SCAP Collection Systems Committee members, Nick Arhontes from OCSD and Bob Kreg from Dudek, provided a two session presentation on the what and the how of the new statewide required Sewer System Management Plan (SSMP). This presentation explained what the requirements are of the eleven basic elements of the SSMP and how to determine compliance with those elements.

WDR-SSO Region 9 Hearing

The public hearing regarding adoption of San Diego Region 9's more restrictive WDR Order was postponed from January 24th to February 14th. Many SCAP members were in attendance at the January 24, 2007 hearing and requested that the tentative order action be removed from the consent agenda. Time constraints required that the item be placed on the February 14, 2007 calendar, where it will be heard on the non-consent agenda. We will be contacting SCAP members in Region 9 to request their attendance at the hearing in order to voice their concerns over the proposed WDR, as well as lend support to a joint presentation to be made by SCAP and CASA.

Agency Profile

Vallecitos Water District

When Bill Rucker, general manager, and Dennis O. Lamb, engineering and operations director, joined Vallecitos Water District in 1973 and 1982, respectively, 80% of the water served agricultural demand and, occasionally, the Land Outfall sewage line would dry up at night because there was so little effluent.

Then the San Marcos area, where the district is headquartered, went through the classic Southern California growth spurt. Master planned communities added 7,000 residential units, a new California State University campus was built and large commercial developments with national big-box retailers went up along several miles of the main business thoroughfare.



Keeping pace has kept Rucker, Lamb and the 100-person district staff busy.

The world's largest pre-stressed reservoir (40 million gallons) is under construction. Design is underway on an 8,000 foot interceptor that will run 36-inch and 42-inch diameter pipe through the city center. The reclamation facility is being upgraded to 5 mgd with more cost-effective activated sludge replacing chemical-hungry rotating contactors. (The district has agreements to sell 4.5 mgd of the reclaimed water at cost to the neighboring city of Carlsbad and to Olivenhain Municipal Water District).

Construction and annexation fees have helped fund these new facilities and relatively new, well maintained systems have helped contribute to the second lowest combined water and wastewater monthly service charge in San Diego County.

"It's a real badge of honor on one hand," Rucker said about the district's low fees. "But on the other hand, people ask us when we're going to start playing catch-up. It's pleasing to have the money from growth to fund the projects, yet the growth represents a fixed long-term, on-going service commitment."

Rucker and Lamb said flexibility has been the key to successful managing past growth and being prepared for projects now on the drawing board.

"We've grown into a reasonably state-of-the-art facility by understanding that flexibility is essential for survival," Rucker said. "It's a delicate balance of 'just enough, just in time' without getting ahead of the curve."

An example of operational flexibility is the computerized maintenance management system (CMMS) the district is now installing (the district selected Maximo as its CMMS tool). "It's a very powerful tool," Lamb said. "But it's similar to when districts started to go to GIS years ago. A CMMS represents a significant investment upfront in software and training, but it will save us money down the road."

The district is also flexible in the role it plays in managing its service levels, particularly when developers and the city start to discuss significant density increases over what the master plan has identified.

"If you go down the path of not being willing to re-look at what you've master-planned, you'll get killed in a growing community like this," Lamb said.

One key is to push development costs onto developers rather than to existing ratepayers, Rucker said. "The district plays an essential function of government by keeping land use agencies a little more honest. The services and demands we have to anticipate are sometimes forgotten during the planning process," he said.

Recruiting operations staff is another successful area for the district. While many districts have concerns about replacing retiring operating staff, Rucker and Lamb have successfully filled vacant slots. They attribute the recruiting success to the district's competitive compensation, recruiting programs from Len Caudle, the human resources director, and the district's location that is more central in the County and sometimes nearer operators' homes.

Water Issues Committee by Chair Gus Dembegiotes**CEQA Scoping Meetings for Proposed Methylmercury Objectives**

On January 5, 2007, the State Water Resources Control Board (State Board) announced it will hold a California Environmental Quality Act (CEQA) scoping meeting to seek input on the scope and content of the environmental information that should be considered in proposed methylmercury objectives for all inland surface waters, enclosed bays, and estuaries in California. The scoping meeting will be held at the Cal/EPA Headquarters Building in Sacramento on Wednesday, February 7, 2007 at 1:30 pm. The purpose of this meeting is to provide a forum for public consultation on the development of proposed methylmercury objectives (fish tissue and/or water column). The State Board will use the scoping meetings to identify actions, alternatives, mitigation measures, and environmental effects to be analyzed. Informational scoping documents on the proposed methylmercury objectives can be found on the State Board's website at <http://www.waterboards.ca.gov>. Written comments on the CEQA documents are due to the State Board on or before February 15, 2007. Based on the U.S. Environmental Protection Agency's (USEPA's) revised methylmercury (MeHg) fish tissue-based criteria guidance (USEPA, 2001), elements of the proposed policy may include a methylmercury fish tissue objective, a total mercury water quality objective, a methylmercury water quality objective, or some combination of these objectives. The proposed policy may also include implementation procedures related to the National Pollutant Discharge Elimination System (NPDES) permitting process.

Integrated Regional Water Management (IRWM)

The State Board and Department of Water Resources have approved funding for seven proposals under the IRWM Implementation Grant Program. In addition, staff will evaluate funding additional proposals from among those that competed in Step 2 of the Implementation Grants process. Scoping meetings are scheduled for January 23 in Sacramento and January 31 in Los Angeles to discuss the funding of additional projects under this program. The Integrated Regional Water Management (IRWM) Grant Program, funded by Proposition 50, provides approximately \$380 million for competitive grants for projects to protect communities from drought, protect and improve water quality, and improve local water security by reducing dependence on imported water. DWR and the State Board are accepting public comments until February 8, 2007 (Noon) on the recommended additional grant funding, and will discuss the issue at upcoming IRWM scoping meetings. More info on the public meetings is available at http://www.grantsloans.water.ca.gov/docs/IRWM_ScopingMeetingInfo.pdf.

Regulatory Affairs by Regulatory Affairs Consultant Mary Jane Foley

The first weeks of the Governor's new term has been busy with the release of sweeping new initiatives that are so broad ranging and diverse they are a challenge to follow. The focus for 2007 will be on more infrastructure bonds, investments in clean energy, deficit reduction, health care, prisons, and redistricting.

SCAP has been watching all this activity and developing strategies to ensure that wastewater funding and water reclamation funding are included in bond trailer bills that will be rolling out as a result of the November 2006 election. To date, we have developed a draft memo on the need for additional language to include wastewater and water reclamation in trailer bills. This memo will be circulated for comment to some of our agencies that employ lobbyists. The purpose of the memo is to develop key messages to include in Prop 84 trailer bills that define water pollution and water quality protection; specifically, we want these bills to include language about wastewater treatment and water reclamation. We have found areas in the Prop 84 bond where additional language would support our member's eligibility for grants. We will be working with several agencies to track any trailer bills that would create the opportunity to insert the language that benefits our industry.

On another front, as SCAP's regulatory affairs consultant, I have been working with the State Waterboard to initiate an MOU between the Waterboard and the Department of Water Resources to get a commitment from DWR to keep the guideline language of the Prop 50, Integrated Regional Water Management Plan, incorporated into Prop 84 guidelines. This secures the language *wastewater and water reclamation* that will assist our members for future grant opportunities. For those of you not in an IRWMP plan, there is a billion dollars in Prop 84 grants, and I encourage you to become aware of this IRWMP process. I continue to offer to help you understand how to get involved in an Integrated Regional Water Management Plan. All that is needed is a project your agency would like to submit for a grant and submitting it to the right party.

Congratulations this month go to:

Western Municipal Water District for receiving the highest honor from the Association of California Water Agencies (AWCA) for outstanding achievement in legislative outreach during 2006.

Western was recognized by ACWA for its leadership in successfully advocating legislative positions to elected officials potentially impacting Western's customers, ratepayers and tax payers.

Another opportunity for grants is Prop 1 E. In the campaign literature, it mentions fixing outdated water and sewer systems. A few bills have been initiated on 1E. We will closely watch and see if there is truth in campaign advertising and if grant dollars flow where the ads stated. So far, the new bills are related to flood control.

On another note, I watched the webcast for the California Air Resources Control Board (ARB) on AB32 – California Global Warming Solutions Act of 2006. This act establishes a statewide target for greenhouse gas reduction by 2020. The Act furthers requires the Air Resources Board to adopt a plan and individual measures to achieve the maximum technologically feasible, and cost effective reductions in greenhouse gas emissions, by various deadlines over the next four years. SCAP is initiating a coalition of POTWs looking into the impact to our industry. Executive Director John Pastore, SCAP President Rich Atwater, and I have a meeting set with CARB AB32 staff to discuss how we can participate to ensure sound science and fair and equitable treatment.

In summary, we are busy on all fronts, trying to get grant resources for our members, keeping an eye on all the critical path issues for water, biosolids, air and collection systems...2007 will be busy and productive. The March 7th SCAP Conference at the Ontario Convention Center is a "do not miss" event. All of the hot topics of the day will be presented. Each committee is working hard to ensure that the information presented will be in a format that helps you understand some of the important issues for the upcoming year.

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

I wanted a perfect ending. Now I've learned, the hard way, that some poems don't rhyme, and some stories don't have a clear beginning, middle and end.

Gilda Radner