

STAFF REPORT

TO: SASM Commissioners

FROM: Liz Falejczyk/Laboratory Analyst/Chemist

Jill Barnes, P.E., Director of Public Works

SUBJECT: National Pollution Discharge Elimination System Program

(NPDES) Permit Renewal

DATE: December 20, 2012

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Presentation of the NPDES Permit renewal.

RECOMMENDATION:

Receive presentation.

BACKGROUND:

Every 5 years the SASM NPDES Permit (Permit) goes through an extensive renewal process, starting with a utility analysis which is a complete review of all analytical data, violations, plant upgrades, standard operating procedures and contingency plans developed or reported since the implementation of the previous permit. Based on the review of that information, permit limits, monitoring requirements and actions required by the agency may change, be removed or added to the permit.

DISCUSSION:

The most significant change in the new permit is an approval to blend partially treated wastewater with fully treated wastewater during significant wet-weather events with influent flow greater than 24.7 MGD. In order to include this allowance into the permit, SASM must comply with the Specific Tasks to Improve Wet Weather Management and Reduce Blending described in Table 8, Page 19 of the Permit). These tasks are similar to many other wastewater treatment plant permits recently adopted.

ITEM 4

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The most significant items in the reissued permit are Tasks 1, 6 and 9 listed in Table 8:

Task 1 requires SASM to consolidate several programs, EPA actions, including revisiting the External Audit Report from 2008 into one, comprehensive Wet Weather Improvement Plan (Plan). Task 1 also requires staff to report on the Plan annually.

Task 6 requires SASM to develop a method of quantifying or *estimating* inflows from member agencies and to then *consider* a flow-based rate structure.

Task 9 requires SASM to report the activities of each member agency regarding existing and future capital improvements intended to reduce inflow and infiltration and, based on this information, make a conclusion of whether the member agency is making adequate improvements.

The limits and monitoring requirements have not changed significantly in this permit, although additional reporting must be noted. Many aspects of monitoring also have pollution prevention or public education pieces added, and the annual report is now very comprehensive.

During the meeting of the San Francisco Bay Regional Water Quality Control Board in which the permit was adopted, the Board expressed appreciation for SASM's efforts to improve since the unfortunate events of 2008 and also for the way in which we worked with Board staff during the renewal process.

Denise Conners from Larry Walker and Associates has been invaluable in the process. Her expertise in the permitting language and knowledge of San Francisco Bay permits made this renewal go smoothly and also made it an enjoyable and enlightening experience.

FISCAL IMPACT:

The reissued Permit will require additional resources to implement the Wet Weather Implementation Plan and meet increased reporting requirements. However, with the addition of blending to the permit, SASM will decrease its exposure to fines which, in the past, could accrue against SASM when blended flows were discharged to the bay. Staff will provide more information to the Board regarding fiscal impacts of the Permit at a future meeting.

- Attachment:
- 1. <u>Revised Tentative Order</u>