

The logo for SCAP (Southern California Alliance of Publicly Owned Treatment Works) features the letters 'SCAP' in a bold, sans-serif font. The letters are filled with a gradient from light blue at the top to dark blue at the bottom. A thin, wavy blue line is positioned below the letters.

SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

**2014 SCAP
ANNUAL REPORT**

www.scap1.org

2014 SCAP Annual Report

ADMINISTRATION

JOHN PASTORE
Executive Director

PAMELA MERRIAM
Executive Administrator

OVERVIEW

The Executive Director provides day-to-day oversight and management to the SCAP office and the general operation of SCAP. This individual provides guidance and general oversight to the Air Quality, Biosolids, Collection Systems, Energy Management, Water Issues, and Wastewater Pretreatment Committees. The Executive Director interacts with the Board of Directors and the Committee Chairs, as well as various members of any given committee or member agency on pertinent issues. He is responsible for providing pertinent information to the Finance Committee for scheduling Board meetings on a regular and as-needed basis.

The Executive Administrator (EA) is responsible for the clerical support that the office provides to the Executive Director, the Board of Directors and the SCAP committees, which includes preparation of meeting notices, agendas and correspondence, as well as compiling the *SCAP Monthly Update*. The EA is also responsible for the day-to-day office operations including all accounting activities, accounts receivable and accounts payable, compiling of the monthly and yearly financial reports, handling of the federal and state reports, preparation of the reports and paperwork for SCAP's CPA at fiscal year end and for compiling the draft fiscal year budget. The EA also assists with the administration of the SCAP website, as well as finalizing all reports, *Monthly Updates*, Alerts, etc. that are to be posted on SCAP's website.

YEAR IN REVIEW

We are now into our 23rd year serving the southern California wastewater community. The Alliance remains strong with 106 members, 82 of which are public agencies. Based upon the excellent membership renewal response we have received this year, it appears that our members continue to be satisfied with the value that SCAP provides them both in regulatory representation and guidance. In 2014, SCAP added 3 new public members and 3 new associate members.

It has now been 8 years since the SCAP committees were restructured in an effort to make them more effective and accessible to the membership. Each of our six committees has a chair and vice-chair and meetings are held on a regular basis. As an added benefit to our members, SCAP has been issuing CWEA-approved contact hours to attendees of qualifying collection system committee meetings and workshops. Our continuing

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outreach effort to the membership has resulted in remarkable committee participation, as documented by approximately 1,755 hours of agency staff commitment in 2014.

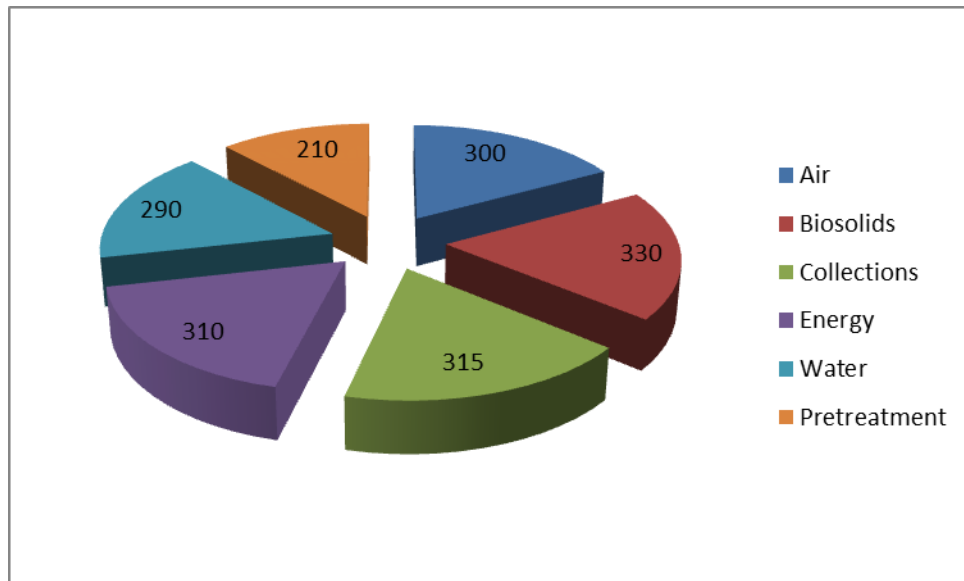


Chart showing agency staff hours associated with each SCAP committee

As a result of the SCAP Strategic Planning Session, the Board also determined that technical and legal committee assistance may be needed from time to time and authorized funding to assist the Executive Director and the committees with their workload. We continue to maintain the SCAP website and to preserve our valuable resource documents that have been posted over the last 23 years, which remain available for use by our members.

The monthly newsletter continues to provide up-to-date regulatory and industry information to both members and non-members alike. SCAP has utilized digital teleconferencing at several meetings this year to assist members in attending committee meetings remotely. Our committees have evaluated other alternatives, such as video conferencing and webcasting, but have yet to fully agree on the feasibility of utilizing these technologies in the future.

SCAP continues to participate in the “Clean Water Summit Partners Group,” made up of the CASA, BACWA, CVCWA, CWEA and SCAP organizations. The Summit Partners meet quarterly in Sacramento to discuss critical issues that are common to our industry. The focus of these meetings centers around regulatory issues that we are all faced with. At each meeting a guest board member of one of the state regulatory boards or its executive officer are invited to participate. The result of these informal meetings is a better understanding of the issues, on both sides of the table, as well as to provide a continuing relationship, association to regulator, and association to association. Hosting of this meeting is on a rotational basis, with SCAP hosting the second meeting of 2014. Further interaction with public agencies statewide is achieved by the Executive Director’s attendance at the monthly CASA Regulatory Workgroup (formerly Tri-TAC) meetings.

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These meetings are held on a rotational basis between northern and southern California, where technical issues of importance are discussed and strategized on.

Over the past several years, SCAP also sponsored various special projects and events that were intended to promote SCAP's new mission and goals. A few of the most significant projects completed by SCAP in the past were: 1) participation in a Cross Media Workshop conducted for the Cal-EPA agencies in Sacramento that resulted in the creation of a Cross-Media Checklist, which was submitted to Cal-EPA and incorporated into many agency work plans; 2) preparation of a White Paper detailing a proposed protocol for measurement of GHGs from POTWs in conjunction with the CWCCG committee; 3) contribution to the Columbia University/WERF Nitrogen Study for testing at selected wastewater treatment plants; 4) preparation of a Wastewater Utility Branding Manual; and 5) sponsorship of legislation aimed at regulating the disposal of "flushable products"; and 6) preparation of a Layperson's Guide to Wastewater. Other sponsored events included, a Water/Wastewater Energy Nexus Forum in conjunction with the Governor's Office held at IEUA; participation in a SONGS workgroup meeting sponsored by the Governor's Office and held at the Santa Margarita WD; an Organics Marketing workshop co-sponsored by NWRI and the Utility Branding Network, which was held at the Irvine Ranch Water District and two Energy Management workshops, co-sponsored by USEPA, CWEA and ICLEI, which were held in Sacramento and Irwindale. SCAP also participated in a statewide workgroup promoting the "No Drugs Down the Drain" program that ended up being extremely successful and was instrumental in working with CASA to hire a climate change coordinator for the California Wastewater Climate Change Group (CWCCG).

Membership Outreach

One of the many benefits to belonging to SCAP is the availability of instant access to information related to wastewater. An increasingly popular method of getting questions answered is the use of SCAP surveys and questionnaires that provide members with relevant information from other agencies. Over the past 12 months SCAP members have responded to the following inquires:

- Biogas flare survey-SCAQMD Rule4311
- Title 5 permit survey
- Annual Air Emissions Reporting Program questionnaire
- Experiences with AQMD waiver for new engine purchases for vacuum trucks questionnaire
- Vacuum truck operations questionnaire—SCAQMD Rule 1188
- SCAQMD Permit Streamlining questionnaire
- Drought impact on air related issues questionnaire
- Fleet Emission Rule impacts to SCAP agencies questionnaire
- Biosolids trends survey
- SSMP responsibilities survey
- Sewer spill disinfection usage survey
- SSMP performance indicators survey

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- Use of peaking factors in determining sewer flow volumes survey
- Insecticide usage survey
- Energy usage rates survey
- Demand response survey
- SCAP name change survey

In addition, a summary of each set of responses is routinely sent out to the membership in a timely manner.

2014 Deliverables

- 2014 Annual Report
- 2014 Annual Biosolids Trends Update

Legal

- SCAP has filed an amicus brief in support of SCAQMD Rule 317 on behalf of the membership and at the request of the Air Quality committee.
- Last year SCAP filed two separate amicus briefs to support SCAQMD and USEPA on Rule 1315 and USEPA and the San Joaquin Valley APCD in regard to Rule 3170.
- SCAP filed a lawsuit in federal court challenging the legality of USEPA's Alternative Testing Procedure (ATP) for the two-concentration test for toxicity.
- SCAP filed a petition in April 2014 for Review with the SWRCB concerning the issuance of a new NPDES permit by the Los Angeles RWQCB to the Calleguas MWD for their Regional Salinity Management Pipeline discharge

Funding is always dependent on the specific situation, with funding coming from either SCAP contingency funds or voluntary contribution from affected parties.

Regulatory

To assist the committees and members, SCAP has prepared and submitted or assisted on comment letters regarding the following issues:

- 1-28-14 SCAP letter to Assemblyman Gatto opposing AB371.2.
- 5-07-14 Summit Partners letter to USEPA recommending Ben Hornstein as the POTW community's designated representative on EPA's expert panel.
- 6-02-14 SCAP letter to Dr. John Faust, OEHHA commenting on Environmental Health Screening Tool.
- 6-06-14 SCAP letter to Senate EQ Committee opposing AB371.

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- 6-09-14 SCAP letter to CARB regarding Portable Diesel Fueled Engines ATCM.
- 7-18-14 SCAP letter to AQMD regarding comments on the Annual Emissions Reporting Portal.
- 9-15-14 SCAP comment letter to Dr. John Faust, OEHHA commenting on Environmental Health Screening Tool.
- 9-17-14 SCAP comment letter to Senate Appropriations Committee supporting FY 15 spending package funding.
- 10-10-14 SCAP letter to LA RWQCB commenting on NPDES Permits for Whittier Narrows and Pomona WRPs.
- 11-17-14 Summit Partners letter to USEPA requesting time extension for public comment period.

Major water related issues under study or currently being addressed by SCAP are:

- Amendments to the Water Quality Control Plan for Enclosed Bays and Estuaries, Part 1 Sediment Quality Objectives
- SWRCB Biological Objectives Implementation for Freshwater Streams and Rivers
- Pesticide regulation by USEPA
- Dental Amalgam Rule
- Revisions to the Waters of the United States Definition
- SWRCB Toxicity Plan
- SWRCB Mercury Objectives Policy
- SWRCB Cadmium Objective
- SWRCB Nutrient Policy
- Various South Coast AQMD rules and policies (see Air Quality Committee report)
- CalRecycle FOG/Food Waste Digestion-solid waste transfer station permitting issue
- CARB revision of AB 32 (2006) Scoping Plan Update
- Volumetric Pricing Initiative
- US EPA Ammonia Criteria for Inland Surface Water dischargers

A more detailed summary of these and other issues facing our wastewater community this year that are being addressed by our SCAP committees is presented in the individual committee reports section.

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THE FUTURE

In the process of addressing the adopted strategic planning priority issues, I foresee a renewed effort by SCAP's committees to stay on top of new wastewater technologies and to promote awareness of best management practices in the various wastewater fields of focus. SCAP's monthly newsletter, website and six working committees continue to provide the best venues for achieving these goals. Our newsletter is read statewide and in some cases has become mandatory reading for certain agencies. Furthermore, SCAP will continue to search for new ways to improve committee effectiveness, like scheduling more presentations and involvement from regulatory officials, centralizing meeting locations, and increasing associate members involvement at the meetings. Strategically, SCAP will be putting forth a renewed effort to enlist new agencies for membership with the assistance of our Board members

SCAP will also look for opportunities to conduct informative workshops and co-sponsor events that compliment committee goals. SCAP will continue to monitor legal/legislative solutions to the disposable/flushable wipes problem and will be reviewing the recent testing and certification protocol developed by the NSF International to certify flushables.

In 2015 SCAP's Executive Director will remain involved with the Summit Partners, NWRI, the Utility Branding Network, the California Wastewater Climate Change Group (CWCCG) and NACWA. The Executive Director will continue to work towards strengthening personal and professional relationships with regional board staff and State Water Board members in Sacramento.

AIR QUALITY COMMITTEE

David Rothbart
Los Angeles County Sanitation Districts
Chair

Vacant

OVERVIEW

The membership of the Air Quality Committee is comprised of SCAP member agency engineering, operations and environmental staff responsible for implementation and monitoring of their respective agency's air quality compliance programs. Participation on the Committee is open to all SCAP member agencies and is strongly encouraged by the Committee membership. The Committee is led by a chair and vice chair and further supported by SCAP staff that provide additional support in the way of performing research, crafting SCAP Alerts, surveys and notices, and maintaining a record of action items for each meeting. The Air Quality Committee meets regularly on a monthly basis. Additional meetings or conference calls are held as deemed necessary.

The mission of the Air Quality Committee is to monitor federal, state and local legislative and regulatory actions related to air quality, determine the potential financial and operational impacts upon our membership and provide proactive advocacy with the goal to both lessen identified impacts as well as to maintain operational flexibility for the essential services our member agencies provide. This is accomplished through personal contact with both elected and/or appointed officials and management staff of regulatory agencies, by providing testimony at public workshops and hearings, by submitting written comments and by performing scientific research, data collection and analysis that support the aforementioned strategies. Additionally, we provide a forum for communicating issues and recommended actions to our member agencies as well as providing a venue for member agencies to vocalize issues of concern that can then be researched by the Committee.

Our appreciation is extended to former SCAP Air Committee chair, Kris Flaig, who is stepping down as air committee chair after 4 ½ years of serving in this capacity. Kris's contributions and leadership will be greatly missed. An appointment to the chair position has now been made and the position is in the capable hands of LACSD's David Rothbart. David has been a long time contributor to the air committee and we are fortunate to have him representing SCAP. Filling of the vice chair position is currently under consideration.

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YEAR IN REVIEW

2014 Monthly Committee Meetings

The Air Quality Committee meets monthly at the offices of the Los Angeles County Sanitation Districts. A formal agenda is prepared and circulated ahead of the meeting, which includes items for discussion and a list of action items from the previous month's meeting with follow-up action. This past year has been a busy year for many issues related to air emissions both regionally and statewide. The AQ Committee conducted 11 meetings this year, in addition to numerous meetings with South Coast AQMD on specific issues of concern.

2014 Regulatory Issues

Major Issues Addressed:

- 2016 Ozone Air Quality Management Plan (AQMP)
- New OEHHA Risk Assessment Guidance Manual
- SCAQMD Proposed Rule 1188 - Vacuum Truck Operations
- SCAQMD New Annual Emissions Reporting Program
- OEHHA's California Communities Environmental Health Screening Tool (CalEnviroScreen)
- SCAQMD Rule 1110.2
- SCAQMD Permit Streamlining

Other Issues Addressed:

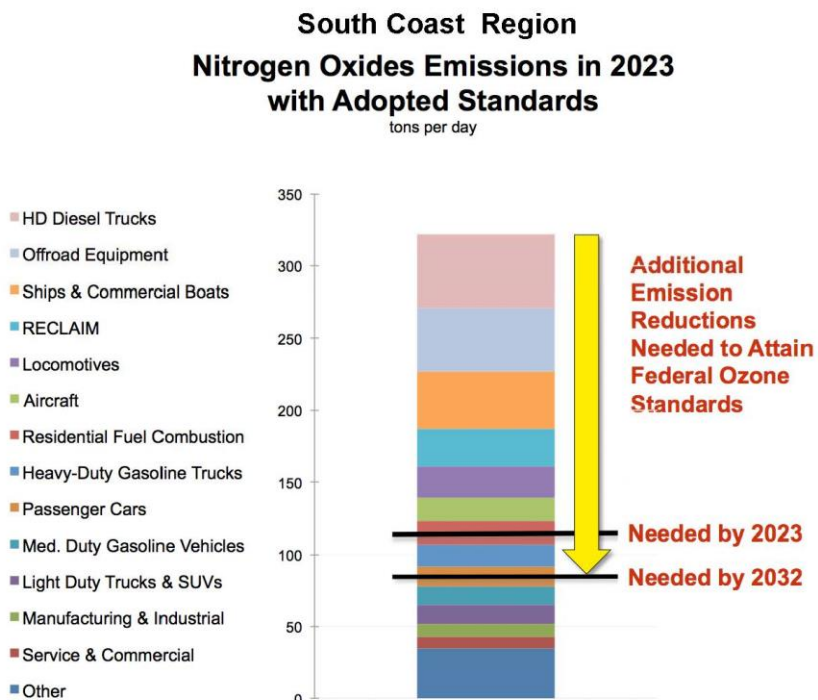
- SCAQMD Rule 317 Litigation – amicus brief
- SCAQMD Rule 1304.1 – use of priority reserve credits for repowering of EGFs
- CARB Portable Diesel Engine ATCM – 2017/2020 compliance deadlines
- Supreme Court Decision - Federal PSD Tailoring Rule
- Distribution of Cap and Trade funds
- CARB's Scoping Plan Update
- Miscellaneous environmental justice issues
- Review and action on miscellaneous state energy legislation

The following topics in which SCAP members were heavily engaged are worthy of more discussion:

1. 2016 Ozone Air Quality Management Plan (AQMP)
In 2014, SCAQMD commenced work on the 2016 AQMP, which will include policies and source control measures needed to achieve the 1997 and 2008 federal 8-hour Ozone National Ambient Air Quality Standards (0.08 and 0.075 ppm,

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respectively). SCAQMD estimates that existing nitrogen oxides (NO_x) emissions need be reduced by two-thirds just to achieve the 1997 standard. In accordance with the federal Clean Air Act, the air basin must attain these stringent standards by 2023 and 2032, respectively. The magnitude of this monumental task is illustrated in the following chart.



Source: Ambient ozone modeling conducted for 2012 AQMP by SCAQMD, final data

SCAQMD has expressed that attainment will require broad deployment of zero- and near-zero emission technologies prior to 2023. Specifically, transportation sources such as trucks, cars, locomotives and cargo handling equipment will need to drastically reduce their emissions. While mobile sources should be the primary focus of the 2016 Ozone AQMP, further emission reductions from stationary sources should also be anticipated.

In April 2014, SCAQMD established an advisory group to review the overall aspects of the AQMP and to make recommendations concerning emission inventories, modeling, control measures and socioeconomic impacts. Technical and policy issues associated with the AQMP will be assessed by SCAQMD advisory subgroups via a series of white papers. Draft white papers are tentatively scheduled to be released in December 2014. The draft AQMP is scheduled to be released for public review in late 2015.

While the 2016 AQMP will require drastic reductions in combustion emissions, EPA is scheduled to revise the National Ambient Air Quality Standard for ozone by December 1, 2014. EPA staff is recommending the standard be lowered again,

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which may approach background levels in the South Coast Air Basin. Due to the economic impact of such a standard, elected officials in Washington, D.C. may attempt to block EPA's efforts.

2. New OEHHA Risk Assessment Guidance Manual

Facility cancer risks are anticipated to triple overnight once OEHHA's draft health risk assessment guidance document is approved. Although orders of magnitude smaller than other more dominant risks like smoking and diet, the risks calculated under OEHHA's new guidance can trigger public notices of a perceived increased risk to the community and mandated risk reduction plans, if "action-level" thresholds are exceeded.

In response to OEHHA's new risk calculation methodology, local air districts throughout California may elect to revise their risk management thresholds (i.e., potentially increase "action-level" thresholds). At this time, SCAQMD Governing Board members have suggested that public notification and mandatory risk reduction thresholds will not be revised (e.g., if facility risk is greater than 25 in a million, risk reduction measures will still be required). In response, stakeholders have expressed concerns that many facilities with Best Available Control Technology (BACT) will be unable to reduce risk below this threshold. SCAQMD staff concurred and suggested that a sector by sector assessment might be required to address facilities already at BACT.

It is anticipated that SCAQMD will adopt the new risk calculation methodology by mid-2015. Subsequently, facilities with the greatest potential risk will be required to prepare a health risk assessment.

3. SCAQMD Proposed Rule 1188 - Vacuum Truck Operations

In accordance with the 2012 AQMP, SCAQMD is required to develop a rule to reduce VOC emissions from vacuum trucks through the use of traditional control devices and technologies, including carbon adsorption. Although vacuum trucks used by the petroleum industry have been identified as the primary source of emissions from this sector, SCAQMD staff also expressed an interest in regulating wastewater vacuum truck operations.

The Air Quality Committee has been working with SCAQMD staff to develop a wastewater vacuum truck operations questionnaire for proposed Rule 1188. The purpose of this survey is to help estimate potential VOC emissions from the wastewater vacuum truck sector. SCAQMD staff recently confirmed that source tests will be performed on wastewater vacuum trucks, which will provide a unit emission rate. Based upon SCAP member source test results, the wastewater sector should be deemed an insignificant source of VOC emissions and exempted from this rule.

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The Air Quality Committee encourages SCAP members to support SCAQMD's source testing efforts. If your agency has any concerns regarding SCAQMD's source testing, you may want to obtain duplicate samples and collect additional samples to validate SCAQMD's results.

4. SCAQMD New Annual Emissions Reporting (AER) Program

The SCAQMD has implemented a new online annual emissions reporting system. This new system requires information not only for each permit, but "devices and processes" within a single permit. For some SCAP members, this detailed reporting could triple the work needed to complete an AER.

The Air Quality Committee and other stakeholders have encouraged SCAQMD to expand its outreach efforts and address technical and administrative concerns associated with the new system. Based upon our feedback, SCAQMD provided clarification that should help reduce some of the data reporting requirements.

Despite our efforts to minimize the reporting burden, we anticipate that preparing your 2014 AER will require a significant amount of effort. In response to these concerns, SCAQMD management agreed to extend the reporting deadline by 30-days. SCAP members who report their air emissions should begin populating SCAQMD's online AER system with their specific emissions sources, and evaluate labor requirements needed for this task.

The SCAQMD offers training sessions to introduce the new reporting system. If you need to obtain training, please click [HERE](#) for more information.

5. California Communities Environmental Health Screening Tool (CalEnviroScreen)

Last year the Office of Environmental Health Hazard Assessment (OEHHA) released a tool for evaluating multiple pollutants and stressors in communities, called the California Communities Environmental Health Screening Tool (CalEnviroScreen). Although this screening tool was intended to identify disadvantaged communities to receive proceeds from the State's cap-and-trade program pursuant to SB 535, environmental groups would like to eventually develop a tool that would assess cumulative impacts upon communities.

While CalEnviroScreen does a valiant job consolidating various sources of available data, this model was never intended to quantify actual impacts to a community. As described above, OEHHA's risk assessment methodology is used to estimate actual risks posed by an emission source. In contrast, CalEnviroScreen only identifies areas of potential exposure that must be subsequently validated. Unfortunately, this message has not been clearly communicated to the public.

Not to be outdone, the EPA has recently announced a similar environmental justice tool called "EJSCREEN". As described [HERE](#), the EPA intends to screen areas that may be candidates for additional consideration, analysis, or outreach as

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the agency develops programs, policies and activities that may affect communities.

6. SCAQMD Rule 1110.2

On July 25th, SCAQMD staff provided an annual Rule 1110.2 status report to the Stationary Source Committee. At this meeting, several SCAP members summarized research and construction difficulties posed by Rule 1110.2 and requested additional time to complete their respective retrofit projects. In response, SCAQMD Board members concurred that these agencies should be provided additional time to retrofit their biogas engines. SCAQMD staff committed to holding another biogas technology meeting in January 2015 to discuss the status of the demonstrations and determine how much additional time might be required to achieve compliance.

On October 29th, a Rule 1110.2 Biogas Technology Advisory Committee meeting was held to discuss: (1) the status of ongoing demonstrations and (2) extending the compliance deadline beyond January 1, 2016. At this meeting SCAQMD staff seemed hesitant to formally extend the retrofit deadline. Another Biogas Technical Advisory Committee meeting is tentatively scheduled for January 2015, where this subject will be discussed again. In the meantime, the Air Quality Committee will request a meeting with SCAQMD executive management to secure relief for members that have worked in good-faith to comply with this rule.

7. SCAQMD Permit Streamlining

A SCAQMD Permit Streamlining Task Force meeting was held in early September to obtain feedback from stakeholders regarding potential measures to improve SCAQMD's permitting process. The Air Quality Committee provided constructive feedback regarding SCAQMD's permitting process, which was appreciated by SCAQMD management. A subsequent meeting with SCAQMD staff was held on September 30th to discuss how to implement specific permit streamlining measures for our membership. These measures could potentially include the development of consistent boilerplate permit conditions and more flexible permit conditions for non-emitting process equipment. The Air Quality Committee formed a subcommittee to draft boilerplate permits for common wastewater treatment units and will compile a listing of non-emitting equipment. Upon completion of these tasks, the Air Quality Committee will schedule a follow-up meeting with SCAQMD staff to discuss our proposed streamlining measures.

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THE FUTURE

Big Issues for 2015:

- In 2015, the Ninth Circuit Court should provide a ruling on Section 185 Clean Air Act Non-Attainment Fees (SJVAPCD Rule 3170 and SCAQMD Rule 317). If a negative ruling is received, SCAP members and other stakeholders might want to lobby for a revision of Section 185 of the Clean Air Act
- Monitor and participate in the implementation of SCAQMD's 2016 Ozone Air Quality Management Plan
- Actively participate in the stakeholder commenting process regarding SCAQMD's implementation of OEHHA's health risk assessment guidance
- Continue working with SCAQMD on Rule 1110.2 to extend the compliance deadline beyond January 1, 2016 for those that have already commenced retrofit projects
- Continue working with SCAQMD to exclude wastewater vacuum trucks from Rule 1188
- Monitor GHG and energy legislation

BIOSOLIDS COMMITTEE

Tom Meregillano
Orange County Sanitation District
Co-Chair

Diane Gilbert Jones
City of Los Angeles
Co-Chair

OVERVIEW

The Biosolids Committee continues to track, disseminate, and provide technical support on regulatory initiatives, emerging biosolids issues and the development of local biosolids facilities that are of concern to SCAP members. The Biosolids Committee meets quarterly, generally at one of the SCAP member agency's facilities, except for meetings that are held in conjunction with the CASA Regulatory Workgroup, formerly Tri-TAC. Meetings may be focused on a particular topic of interest, feature a biosolids facility tour or may be more generally focused on a broad range of topics related to biosolids management. The Biosolids Committee has a standing list of agenda items related to regulatory issues, reuse options, Class A and B biosolids alternatives, and current or future biosolids management practices. The main focus of the Biosolids Committee is to provide information to the member agencies concerning new or proposed federal, state and local regulations, which may potentially affect how each agency manages its biosolids. Monthly updates are provided along with e-mail notifications, and SCAP Alerts are used to address important issues that need immediate attention.

Our appreciation is extended to former SCAP Biosolids Committee chair, Matt Bao-LACSD, who is stepping down as air committee chair after 3 ½ years of serving in this capacity. Matt's contributions and leadership to the committee is greatly appreciated. An appointment to the chair position has now been made and the position is in the capable hands of OCSO's Tom Meregillano and City of LA's Diane Gilbert Jones. Both Tom and Diane have spent many years on the committee as former chairs and vice chairs and we are fortunate to have them continuing to lead the committee.

The Biosolids Committee meets quarterly, or on an as-needed basis. This year the Biosolids Committee has held 5 meetings throughout Southern California.

On March 11th the Biosolids committee held its **first meeting** of the year, which was hosted by the City of Los Angeles Bureau of Sanitation, and was held at the Environmental Learning Center (ELC) located at the Hyperion



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Treatment Plant. The first half of our meeting included a guided tour of the ELC and its exhibits and interactive games.

The second half of the meeting included updates from the committee chairs, Matt, Tom and Diane and a presentation by Anaergia's Dave Schneider regarding their services and featured projects, including the EnerTech Site Redevelopment "Rialto Bioenergy Facility" and a food waste demonstration project scheduled for the Encina Wastewater Authority in Carlsbad.



The **second Biosolids Committee meeting** was held on May 8th at Orange County Sanitation District in conjunction with the SCAP Water Issues Committee and the CASA Regulatory Workgroup. At the General Session, Claudio Ternieden, Director of Regulatory Affairs from the Water Environment Federation, presented on some key legislative and regulatory initiatives WEF is tracking this year. He made a commitment to support CASA and SCAP.

At the first half of the Biosolids Committee meeting, biosolids and renewable energy representatives from KORE Infrastructure, Gate5, and Holloway Mines, presented on their innovative biosolids to energy technologies and biosolids management options. The second half of the meeting included updates on San Luis Obispo's biosolids ordinance, Kern County's Measure E, and AB 371 Kern County Sludge Ban. Furthermore, state policies that could affect biosolids management, such as the FOG and food waste digestion regulations and 75% organic diversion plan by CalRecycle were also discussed. The remainder of the meeting consisted of updates to regional facilities in northern and southern California, reports on several regional biosolids associations, and updates to biosolids research, including research on emerging contaminants.



The **third Biosolids Committee meeting** was held on May 13th jointly with the Energy Management Committee at the Victor Valley Wastewater Reclamation Authority's (VWVRA) treatment plant in Victorville. The meeting included committee updates from the Biosolids Committee vice chairs, Tom Meregillano and Diane Gilbert-Jones, and Energy chair, Steven Hernandez. The updates were followed by presentations from VWVRA's Alton



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Anderson and Logan Olds in addition to Anaergia's Juan Jesse. A tour of VVWRA's new omnivore digestion system followed the presentations.

The **fourth Biosolids Committee** meeting was held jointly with the SCAP Energy Management Committee on August 12th at the Irvine Ranch Water District Michelson WRP. The meeting began with committee updates by Biosolids Committee Vice Chair, Tom Meregillano and Energy Committee Chair, Steven Hernandez and included a presentation on our host's Embedded Energy Management Plan, as it relates to wastewater/recycled water, by Paul Weghorst, IRWD's Executive Director of Water Policy; a presentation on IRWD's



Biosolids & Energy Recovery Facility by IRWD's Principal Engineer, Steve Malloy, which included a virtual tour of the planned facilities; and a lively roundtable discussion by utility representatives and POTW representatives on electricity rates, programs and charges, as they relate to water/wastewater facilities.

The roundtable panel, moderated by **Carollo's** Tom Mossinger, included POTW representatives: **Encina WA's** Octavio Navarrete; **LACSD's** Mark McDannel; **Eastern MWD's** Dan Howell; **IRWD's** Randy Lee; as well as Utility representatives, **SDG&E** Associate Account Executive, Kazeem B. Omidiji; and **SCE** Account Manager, James Pasmore Jr., who also provided a detailed presentation on SCE's rate structure and charges.

The **fifth Biosolids Committee meeting** was held jointly with the SCAP Water Issues Committee and the CASA Regulatory Workgroup at OCSD on October 9th. The meeting included updates from all of the state's regional associations as well as legislative and regulatory updates from CASA's Greg Kester.

2014 Regulatory Issues

Throughout the year, the Biosolids Committee has monitored various regulatory issues related to Biosolids. The following are a few of the more significant issues that the committee tracked during 2014 (many of which have been carried over from 2013).

Major Issues Addressed

- Kern County Measure E
- CalRecycle Regulation on co-digestion of FOG/Food Waste Digestion at POTWs
- California Food and Drug Administration Proposed Rendering Regulations
CalRecycle 75% Waste Diversion Plan
- Statewide General WDR for Compost Management Units
- FDA's Food and Safety proposed regulations

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- NPDES Proposed Electronic Reporting Rule
- Arsenic Cancer Slope Factor
- Pyrethroids/Pesticides

- Trace organics Studies

Kern County Measure E-Lawsuit Update

On June 26, 2013, the California Supreme Court granted Kern County's Petition for Review of the decision issued by the Fifth Appellate District in *City of Los Angeles v. County of Kern*. That opinion, published earlier this year, was very favorable to CASA and its co-Plaintiffs, and upheld the preliminary injunction preventing Kern County from enforcing the initiative ordinance banning the land application of biosolids in the county, Measure E.

The scope of the Supreme Court's review does not extend to the underlying merits of the appellate court decision. The Supreme Court granted review only on a narrow procedural issue pertaining to tolling of a statute of limitations period when state law claims are pending in federal court. This issue is limited to the following: "Does 28 U.S.C. section 1367(d) require a party to re-file its state law claims within 30 days of their dismissal from a federal action in which they had been presented, or does it instead suspend the running of the limitations period during the pendency of the claims in federal court and for 30 days after their dismissal."

The Supreme Court declined to consider the more substantive issues in the litigation, meaning the core of the Appellate Court's favorable decision holding that Measure E is preempted by the IWMA and that Measure E conflicts with the regional welfare doctrine remains intact.

On July 7, 2014 the Supreme Court reversed the Appellate Court ruling on the statute of limitation grounds. The case was remanded to the California Superior Court, presiding Judge Hicks. The ruling was a technical ruling regarding only the timing of the lawsuit against the Kern Biosolids Ban. There are other grounds for upholding the timeliness of the lawsuit that will now be reviewed by the trial court. One of these grounds is that California law provides that a new lawsuit can be brought anytime within a year following an appeals court ruling dismissing the case on a non-merits basis.

On September 26, 2014, the City of L.A. filed a motion in Tulare County Superior Court supporting a summary judgment to issue a permanent injunction against Kern County Measure E. Hearing scheduled on January 15, 2015. SCAP will continue to track.

Update AB 371 – Kern County Sludge Bill

Since the introduction of AB 371 in April 2013, SCAP had taken a firm opposition on the bill along with its member agencies. SCAP members were urged to send letters against this bill to their local Assembly and Senate representatives. The proposed bill would have allowed additional testing of biosolids and groundwater twice a year for two years beginning January 1, 2015. However, on August 21, 2014, a late amendment stipulated

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that the bill would only apply to those entities land applying more than 10,000 tons per year in the County. This essentially narrowed it to only apply to the City of Los Angeles' Green Acres Farm, making it a discriminatory bill. On September 1, 2014, the bill was officially pulled out of the legislative process. This was attributed to the successful advocacy of the wastewater community.

CalRecycle and FOG and Food Waste Receipt at POTWs

SCAP has been monitoring and supporting CASA's long efforts to encourage CalRecycle to adopt an exemption for POTWs from transfer station, processing, and in-vessel digestion permitting requirements associated with receiving FOG and food wastes intended for co-digestion.

In September 2013, Tom Howard, Executive Director of the State Water Resources Control Board (SWRCB), sent a letter to every POTW that holds an NPDES permit or WDR permit holder in the state that treats more than 1 MGD, regarding the receipt of hauled in organic waste for anaerobic digestion at POTWs. The letter culminated a multi-year effort by CASA in working with the SWRCB, CalRecycle, and the California Department of Food and Agriculture (CDFA) to streamline the permitting process and to ensure that this activity is regulated by only a single agency rather than all of them.

The SWRCB's position offers an option for POTWs that are engaged or planning to engage in co-digestion activities to develop a Standard Operating Procedures (SOPs). As permits are issued or reissued, a Standard Provision will be inserted in the permit, requiring development of a SOP.

In conjunction of the SWRCB's efforts, CalRecycle, after a series our multiple of workshops, announced in October 2014 the beginning of the formal rulemaking process for the exclusion for POTWs accepting hauled in organic waste for co-digestion. A 45-day public comment was initiated. The regulations must be adopted within 12 months of the date on which the formal rulemaking begins. SCAP will continue to support and track.

Revised food safety regulations to be released by FDA

U.S. Food and Drug Administration had announced that they will be issuing revisions to their regulations initially proposed in January 2013 for which the public comment period ended on November 22, 2013. SCAP, along with CASA, supported the regulation, because it allows the use of biosolids for growing produce (under 40 CFR 503) and included pragmatic requirements for the use of recycled water for irrigation. Recently FDA made revisions to the proposed regulation, but has not yet released them. SCAP will continue to track.

Statewide General Waste Discharge Requirements for the Discharge of Waste at Compost Management Unit

The Draft SWRCB General Order for Compost facilities may impact POTWs. If you are composting at a wastewater treatment facility covered under an NPDES permit, or if you operate an in-vessel or enclosed facility, you are exempt. However if you are covered

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under an existing WDR you may or may not be exempt based on the following: “Dischargers of CMU’s (Compost management units) subject to individual WDRs issued by the Regional Water Boards are not required to enroll under this Order if the requirements of the individual WDRs are more protective than those prescribed in this Order.”

The SWRCB held a number of public hearings on this issue and is in the process of preparing a Draft Environmental Impact Report (EIR) for the Proposed General Waste Discharge Requirements for Composting Operations (Order), which was revised on May 2014. SWCB has not yet released the Draft Environmental Impact Report for review. SCAP will continue to track.

1. The City of Los Angeles received a new U. S. EPA Underground Injection Control (UIC) Permit in December 2013. The new UIC permit allows the City to continue demonstrating deep well placement on wastewater residuals, including biosolids for another five years. The conditions of the new permit are: Construction of a 4th well at the existing project site. This well will be drilled to 7,500 feet as opposed to current wells drilled to 5,300 feet. At this new depth the injection operation will facilitate further analysis of its productivity.
2. Deepening the existing monitoring and injection wells from 5,300 feet to 7,500 feet.
3. Construction of project replacement wells as deemed necessary during the demonstration phase, allowing for operational well problems and unforeseen conditions (i.e. natural disasters, mechanical failure, etc.)
4. Alternating or simultaneous injection into two wells to facilitate the previously approved injection capacity.

Terminal Island Renewable Energy Project (TIRE)

The Terminal Island Renewable Energy Project (TIRE) is completing its sixth year of successful operation injecting biosolids into deep, depleted subsurface geological formations. The earth’s high temperature biodegrades the organic compounds to generate methane gas, which can ultimately be used to produce an environmentally safe renewable energy, while carbon dioxide is sequestered. The project currently has one injection well and 3 monitoring wells in operation. The first injections started in 2008 and to date the City of Los Angeles has placed over 320 million gallons of bio-slurry material 5,200 feet below the subsurface.

Some environmental benefits seen to date are:

- Eliminated over 1.4 million miles of heavy truck traffic and associated exhaust emissions, pollutants, odors and dust
- Sequestered more than 19,000 tons of Carbon Dioxide (CO₂)
- Eliminated more than 16 tons of Nitrogen Oxide (NO_x) and 15 tons of Carbon Monoxide (CO)

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Pyrethroid Pesticide

With growing statewide concerns from POTWs of the development of pyrethroid TMDLs, representatives from SCAP, CASA, Bay Area Clean Water Agencies, and Central Valley Clean Water Association, formed a pesticides steering committee on behalf of Tri-TAC/CASA Regulatory Workgroup, to work in proactive partnership with the Department of Pesticide Regulation (DPR), SWRCB, and the manufacturers known as the Pyrethroid Working Group (PWG). For many years, the Committee has been working on the front end of pesticide regulations to reasonably mitigate requirements to the wastewater community.

In 2013, thirty-two volunteer wastewater treatment plants participated in a survey, which determined concentrations of eight pyrethroids in influent, effluent, and biosolids. This was a first step effort to obtain a snapshot of concentration data for these constituents. No determination of impact or assignment of meaning has yet been attributed to the concentration levels found but follow up work is anticipated. The survey was published on January 2014 and distributed to SCAP member.

For fiscal year 2014-2015, the Committee will focus on the following areas:

- Comment, and advocate on federal and state actions and research on pesticides:
- Plan on a source identification study:
- Work with the DPR, the State Water Boards, manufacturers, and wastewater community on a source identification study.
- Investigate the bioavailability of pesticides in effluent and biosolids and
- Continue to work with key stakeholders.

SCAP will continue to be an active participant.

CalRecycle 75% Recycling Goal

SCAP continues to work closely with CASA Regulatory Workgroup to seek clarity on the status of the CalRecycle's plan to achieve 75% recycling goal of AB 341. In particular, the interest has been on the possibility that CalRecycle may eliminate biosolids as an alternative daily cover (ADC) at municipal solid waste landfills along with its associated recycling credits. Last year, CalRecycle solicited comments on their preliminary plan, which many POTWs and sanitary associations responded. On June 18, 2013, CalRecycle hosted a workshop to seek public input on a draft Waste Sector Management Plan that discusses activities to achieve the 75% recycling goal of AB 341. It is still unclear the fate of biosolids at municipal solid waste landfills. With the lack of infrastructure and markets in place for alternative options for biosolids, the possibility of prohibiting biosolids as an ADC is a concern.

In early 2014, there were continued discussions with CalRecycle on the fate of biosolids as an ADC. They mentioned that they were not proposing a "ban" on biosolids at landfills nor on its use as ADC. However, they do not expect to allow its use as ADC to count toward the 75% recycling goal. As for the Waste Sector Management Plan, there is no word on the schedule of the release of this document. SCAP will continue to track.

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THE FUTURE

The Biosolids Committee will continue to focus on developments related to new regulations affecting biosolids management and monitor the development of several biosolids management facilities. The following are specific issues for the upcoming year:

- Chemicals of Emerging Concern (CECs) in biosolids;
- Cross Media regulations and conflicts;
- Federal regulations of biosolids incineration;
- Biosolids management options and technologies;
- Local measures and ordinances prohibiting biosolids management (e.g, Kern, Imperial, and San Luis Obispo).

The Biosolids Committee will continue to meet regularly at one of the member agencies' locations, or jointly with other biosolids industry associations. Since there has been positive feedback and an increase in participation when meetings are focused on a specific relevant topic or on local biosolids projects, the Biosolids Committee will likely continue this meeting format. The Biosolids Committee will continue to communicate issues through SCAP Alerts or e-mail distribution of news articles and draft regulations, along with a summary included in the *SCAP Monthly Update*.

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YEAR IN REVIEW

COLLECTION SYSTEMS COMMITTEE

Ralph Palomares
El Toro Water District
Chair

Dindo Carrillo
Orange County Sanitation District
Vice Chair

OVERVIEW

The committee was organized and began operations in November 2003.

Mission: The SCAP Collection Systems Committee (CSC) will serve as a resource group to assist SCAP members in achieving compliance with regulations affecting collection systems.

Goals: Provide education, training, regulatory and legislative advocacy in coordination with CASA, CWEA and the League of California Cities and others. Develop strategies, annual work plans, and a long-range growth plan for the SCAP Board.

Customers/Market: Current SCAP members, and new members such as special districts, cities, and agencies that independently own and operate sanitary sewer systems.

Services Provided: Workshops, outreach efforts, committee developed value added products, guidelines, model programs, training (with partner associations as needed), presentations to the public and at regulatory hearings and other associations where approved by the SCAP Executive Director.

YEAR IN REVIEW

2014 Committee Meetings and Locations

The Collection Systems Committee strives to meet quarterly but has conducted only 2 meetings in 2014, due to the absence of the committee chair due to surgery. A third committee meeting/workshop on asset management by WERF was scheduled but cancelled at the last minute due to a speaker conflict.

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The **first SCAP Collection Systems Committee meeting** of the year was held on February 25th and hosted by the Los Angeles County Department of Public Work in Alhambra. The meeting was very well attended and presentations were made by: Fernando Villaluna from the LADPW concerning lessons learned from condition assessment of their agencies sewer lines; LACSD's Mark Petit regarding a new and innovative method of mitigating ragging in sewer pumps of all sizes; Dindo Carrillo from OCS, Bob Craig from Dudek and John Pastore - SCAP regarding updates on the Statewide WDR and SSO Monitoring & Reporting Program; and an update by John Pastore on a WERF proposal he is working on to study the effects of pulp loading on downstream sewers.



The **second meeting of SCAP Collection Systems Committee** for 2014 was held on May 22nd at the Victor Valley Wastewater Reclamation Authority's treatment plant in Victorville. The meeting included presentations by General Manager Logan Olds and Construction Manager Alton Anderson on VVWRA's "Upper Narrows Pipeline Replacement Project" and was followed by an extensive tour of the project.



Collection System Committee Issues in 2014

Regulatory Issues

- Revisions to the statewide SSO-WDR Permit.
- Revisions and updates to SWRCB-CIWQS SSO reporting program.
- SWRCB WDR SSMP Audits.
- South Coast AQMD Rule 1188-Vacuum Truck Emissions
- Violations and Enforcement Actions

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Non-Regulatory Issues

- Flushable wipes.
- Development of an accepted spill volume calculation model.
- Odor and corrosion control measures.
- Study of spill incident cases and enforcement.
- Ebola guidelines and safety practices.

Sewer System Management Plan (SSMP) Guidance Document

The State Water Board (SWRCB) and the SWRCB Data Review Committee, consisting of SSS WDR Order stakeholders, have taken on the task to write an SSMP Guidance Document. According to the SSS WDR Order, all public agencies that own or operate a sanitary sewer system of more than one mile of pipes that convey wastewater to a publicly owned treatment facility must apply for coverage under the SSS WDR and its enrollees have to complete an SSMP.

The SSMP has to be certified and approved by the agency's governing board as required in provision D.15 of the SSS WDR. In addition, provision D.14 states that the SSMP must be updated every five (5) years, and must include any significant program changes. Re-certification of the SSMP by the governing board of the Enrollee is required.

The SSMP Guidance Document will provide direction on how to create an SSMP for those new WDR Order enrollees and help current WDR Order enrollees update their existing SSMP so that it meets or exceeds what the WDR Order requires.

According to the Data Review Committee the final product will be ready for publication and circulation by December 2014. In addition, the SWRCB will also host an SSO Library online. Some documents that will be stored there is the SSMP Guidance Document, Regional Water Board Field Inspection Questionnaires, EPA Inspection Questionnaires, SWRCB presentations, samples of audit reports, technical reports, water quality monitoring plans, and other SSO related documents.

SCAQMD Proposed Rule 1188 - Vacuum Truck Operations

In accordance with the 2012 AQMP, SCAQMD is required to develop a rule to reduce VOC emissions from vacuum trucks through the use of traditional control devices and technologies, including carbon adsorption. Although vacuum trucks used by the petroleum industry have been identified as the primary source of emissions from this sector, SCAQMD staff also expressed an interest in regulating wastewater vacuum truck operations.



The Air Quality Committee has been working with SCAQMD staff to develop a wastewater vacuum truck operations questionnaire for proposed Rule 1188. The purpose

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of this survey is to help estimate potential VOC emissions from the wastewater vacuum truck sector. SCAQMD staff recently confirmed that source tests will be performed on wastewater vacuum trucks, which will provide a unit emission rate. Based upon SCAP member source test results, the wastewater sector should be deemed an insignificant source of VOC emissions and exempted from this rule.

The Air Quality Committee encourages SCAP members to support SCAQMD's source testing efforts. If your agency has any concerns regarding SCAQMD's source testing, you may want to obtain duplicate samples and collect additional samples to validate SCAQMD's results.

Interim Guidance for Managers and Workers Handling Untreated Sewage from Individuals with Ebola in the United States---November 20, 2014

Who this is for: Workers who handle untreated sewage that comes from hospitals, medical facilities, and other facilities with confirmed individuals with Ebola.

What this is for: To provide recommendations for workers on the types of personal protective equipment (PPE) to be used and proper hygiene for the safe handling of untreated sewage that may contain Ebola virus.

How to use: Use this document to reduce the workers' risk of exposure to infectious agents including Ebola virus when working with untreated sewage.

Key Points:

- Ebola virus is more fragile than many enteric viruses that cause diarrheal disease or hepatitis.
- The envelope that covers Ebola makes it more susceptible to environmental stresses and to chemical germicides than non-enveloped viruses, such as hepatitis A, poliovirus, and norovirus.
- To protect workers against Ebola
 - Educate them on
 - What PPE to use to protect broken skin and mucous membranes and
 - How to properly use the PPE, including how to put it on and take it off.
 - Develop and fully implement routine protocols that ensure workers are protected against potential exposures (i.e., prevent contact with broken skin, eyes, nose or mouth) when handling untreated sewage.
 - Ensure all workers always practice good personal hygiene, including frequent hand washing to reduce potential exposures to any of the pathogens in sewage.

This guidance is based on current knowledge of Ebola virus, including detailed information on Ebola virus transmission, recommendations from the World Health Organization (WHO), and scientific studies of wastewater treatment and workers who

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handle wastewater.^{1,2,3} Updates will be posted as needed on the CDC Ebola webpage at <http://www.cdc.gov/vhf/ebola/>.

Some workers come in contact with untreated sewage before it enters the wastewater treatment plant and could be at very low risk of exposure to Ebola virus. These workers include:

- Plumbers in hospitals that are currently treating an Ebola patient
- Sewer maintenance workers working on the active sewer lines serving the hospital with an Ebola patient
- Construction workers who repair or replace active sewer lines serving the hospital with an Ebola patient

Transmission

Ebola virus is transmitted through:

- Direct, unprotected contact (i.e., with broken skin, eyes, nose or mouth) with blood or other body fluids (e.g., , feces, vomit, urine, saliva, sweat, breast milk, tears, vaginal fluid, and semen) of an infected patient who is actively ill
- Needle stick injuries from needles and syringes that have been contaminated with infected blood or other body fluids and tissue from an infected patient who is actively ill
- Unprotected contact with medical equipment contaminated with blood or body fluids from an infected patient who is actively ill
- Direct, unprotected contact with the body of someone who has died from Ebola

The World Health Organization recommends that human wastes, including waste from Ebola patients such as vomitus and feces, be either disposed of through a sanitary sewer or be buried in a pit toilet or latrine with no additional contact or treatment.^{4,5,6} There has been no evidence to date that Ebola can be transmitted via exposure to sewage.⁷ The WHO has established guidelines for hygiene and PPE to prevent exposure to potential pathogens when working with untreated sewage.^{4,5} In the United States, human waste (i.e., excreta), blood, and other potentially infectious materials are routinely released into sanitary sewers. Wastewater handling processes in the United States are designed to inactivate and remove pathogens, such as Ebola. Workers should follow the guidelines below to prevent exposure to human pathogens, including Ebola virus, when working with untreated wastewater.

Personal Protective Equipment (PPE)

Workers handling human waste or sewage should be provided hand washing facilities at the worksite, PPE (described below), and training on how to use this PPE. The training should specifically address methods for the correct and safe removal of PPE to prevent workers from contaminating themselves or others during its removal. Trained workers should demonstrate both knowledge of the appropriate PPE they will be expected to wear and proficiency in its use. If using a respirator, the worker should be part of a respiratory protection program that includes medical clearance and fit-testing under OSHA's PPE standard (29 CFR 1910.132). Workers should wash hands with soap and water immediately after removing PPE. Leak-proof infectious waste containers should be

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provided for discarding used PPE. Guidelines for dealing with potentially infectious waste can be found at <http://www.cdc.gov/vhf/ebola/hcp/medical-waste-management.html> and https://www.osha.gov/Publications/OSHA_FS-3756.pdf

The following PPE is recommended for workers handling untreated sewage:

- Goggles or face shield: to protect eyes from splashes of untreated sewage
- Face mask (e.g., surgical mask): to protect nose and mouth from splashes of human waste. If undertaking cleaning processes that generate aerosols, a NIOSH-approved N-95 respirator should be used.
- Impermeable or fluid-resistant coveralls: to keep untreated sewage off clothing
- Waterproof gloves (such as heavy-duty rubber outer gloves with nitrile inner gloves) to prevent exposure of hands to untreated sewage
- Rubber boots: to prevent exposure of feet to untreated sewage.

Basic Hygiene Practices

- Wash skin with soap and water immediately after handling sewage, or any materials that have been in contact with sewage.
- Avoid touching face, mouth, eyes, nose, or open sores and cuts while handling sewage, or any materials that have been in contact with sewage.
- Wash hands with soap and water before eating or drinking after handling sewage.
- Remove soiled work clothes and do not take home to launder. Launder clothing at work or use a uniform service.
- Eat in designated areas away from untreated sewage.
- Do not smoke or chew tobacco or gum while handling human waste or sewage, or any materials that have been in contact with human waste or sewage.
- Cover open sores, cuts, and wounds with clean, dry bandages.

References

¹ McCunney RJ [1986]. Health effects of work at waste water treatment plants: a review of the literature with guidelines for medical surveillance. *Am J Ind Med* 9(3):271–279.

² Khuder SA, Arthur T, Bisesi MS, Schaub EA [1998]. Prevalence of infectious diseases and associated symptoms in wastewater treatment workers. *Am J Ind Med* 33(6):571–577.

³ CDC (Centers for Disease Control and Prevention) [2011]. Guidance for reducing health risks to workers handling human waste or sewage. http://www.cdc.gov/haiticholera/workers_handlingwaste.htm. Date accessed: November 2014.

⁴ WHO (World Health Organization) [2014a]. [Infection prevention and control guidance for care of patients in health-care settings, with focus on Ebola](#). Date accessed: November 2014.

⁵ WHO [2014b]. Safe management of wastes from health-care activities. 2nd ed. Chartier Y, Emmanuel J, Piper U, Prüss A, Rushbrook P, Stringer R, Townend W, Wilburn S, Zghondi R, eds. http://apps.who.int/iris/bitstream/10665/85349/1/9789241548564_eng.pdf?ua=1. Date accessed: November 2014.

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⁶ WHO [2014c]. Ebola virus disease (EVD): key questions and answers concerning water, sanitation and hygiene. http://www.who.int/water_sanitation_health/WASH_and_Ebola.pdf?ua=1 Date accessed: November 2014.

⁷ Weber DJ, Rutala WA [2001]. Risks and prevention of nosocomial transmission of rare zoonotic diseases. Clin Infect Dis 32(3):446-456

THE FUTURE

SWRCB: The CSC will continue to actively participate with the SWRCB to ensure that stakeholder concerns regarding the proposed changes to the WDR and MRP are appropriately addressed and to refine the statewide reporting database to provide the best possible medium for the reporting of SSOs. Make available sample Sewer System Management Plans, sample WDR Audit Plans and sample WDR Enforcement documents for the exclusive use of SCAP members.

Regional Boards: Meet with RWQCB staff in an attempt to identify how best the SCAP CSC can assist in all Regions when it comes to WDR implementation.

CASA Regulatory Workgroup (formerly Tri-TAC): Collaborate on projects such as the CalFOG effort. OCSO, ETWD and LACSOS are represented at this time and serve on the Steering Committee. See <http://www.calfog.org> for background info.

Other CSCs: Continue outreach, define deal points and needed collaboration with the Central Valley CSC, Bay Area CWA, CWEA Collections Committee, and OC WDR Steering Committee.

CWEA: Continue to participate in CWEA's SSO-WDR Task Force which serves to identify and conduct regional training needs. Work more closely with the CWEA local sections that have CSCs. Be supportive of CWEA's Collection System Certification Program. See <http://www.cwea.org> for info on CWEA, its training and certification programs for collection systems technicians, supervisors and managers, certification prep materials, local section info and upcoming events. CWEA does allow contact hours for all those who attend selected SCAP training seminars and the committee is also interested in working with CWEA in the development of training outreach to assist the wastewater community in complying with all new statewide rules and regulations regarding the wastewater industry.

Committee Meetings and Office Support: Hold meetings quarterly at a convenient location alternating between northern and southern locales. Continue to provide SCAP members with the opportunity to actively participate at the quarterly meetings by presenting information relevant to collection systems and their implementation and compliance with the SSO-WDR. SCAP office staff will maintain an active membership contact list at all times.

ENERGY MANAGEMENT COMMITTEE

Steven Hernandez
Los Angeles County Sanitation Districts
Chair

Jesse Pompa
Inland Empire Utilities Agency
Vice Chair

OVERVIEW

The Energy Management Committee was formed as a new SCAP committee in the fall of 2008 to provide a forum for collaboration and exchange of information regarding energy production, energy efficiency, and energy markets. The Committee activities seek to contribute to efforts to control the cost and amount of energy utilized in the wastewater treatment process. The Committee also explores emerging technologies that may lead to further improvements in energy production and efficiency. Committee members present projects, case studies and facility tours that relate to energy issues at local treatment plants as well as research topics of common interest to the Committee. The Committee also tracks relevant energy legislation and funding opportunities on behalf of SCAP members.

YEAR IN REVIEW

2014 Committee Meetings and Locations

The Energy Management Committee strives to meet once each quarter or on an as-needed basis. The meetings alternate between tours at various facilities located throughout the SCAP territory and a central office location, where meetings focus on presentations and discussion. The Energy Management Committee conducted 3 meetings in 2014.

The SCAP **Energy Management committee met for the first time in 2014** on February 27th at [LACSD's Joint Water Pollution Control Plant \(JWPCP\)](#), located in the City of Carson. The meeting featured presentations: by Ken Weston from the LA City Bureau of Sanitation, who reported on the Los Angeles City's Hyperion Treatment Plant Digester Gas Utilization Project (DGUP); by LACSD's Jim LaRoche, who discussed the lessons learned during startup and commissioning of the JWPCP Steam System; and by LACSD's Dave Czerniak, who discussed the Food Waste Anaerobic Digestion Demonstration Program at the Joint Water Pollution Control Plant.

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A copy of all of the presentations can be found in the committee presentation folder on the SCAP website [here](#).

During the question and answer period, LACSD's Mark McDannel shared some information concerning the specifics of the food waste slurry feed, and since he was going strictly off of memory at the time, he wanted to make sure that the following information was shown here for accuracy.

20,000 gpd of food waste slurry is fed to the digester in addition to 205,000 of biosolids slurry fed to both the test digester and the control digester. The food waste feed rate is 9% of total flow on a liquids basis and 30% on a solids basis. Target feed rate information is presented below.

	Test Digester	Control Digester
Wastewater/sludge feed		
gal/day	205,000	205,000
% solids	3.20%	3.20%
tons per day solids	27.3	27.3
Food waste slurry feed		
gal/day	20,000	
% solids	14%	
tons per day solids	11.7	
% Food Waste		
liquid basis	9%	
solids basis	30%	
Digester total		
Gal/day	225,000	205,000
% Solids	4.2%	3.20%
Residence time, days	16.4	18.0

Following the presentations, the committee was treated to a tour of both the food waste demonstration and the steam system equipment.

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The **second meeting of 2014 for the Energy Management Committee** was held on May 13th jointly with the Biosolids Committee at the Victor Valley Wastewater Reclamation Authority's treatment plant in Victorville. The meeting included committee updates from Energy chair, Steven Hernandez and Biosolids vice chairs, Tom Meregillano and Diane Gilbert-Jones. The updates were followed by presentations from VVWRA's Alton Anderson and Anaergia's Juan Josse along with a tour of VVWRA's new omnivore digestion system.



A **special meeting of the Energy Management and Biosolids Committees** was held on August 12th at the Irvine Ranch Water District, Michelson Water Recycling Plant, in Irvine, CA. The meeting began with committee updates by Biosolids Committee Vice Chair, Tom Meregillano and Energy Committee Chair, Steven Hernandez and included a presentation on our host's Embedded Energy Management Plan, as it relates to wastewater/recycled water; by Paul Weghorst, IRWD's Executive Director of Water Policy; a presentation on IRWD's Biosolids & Energy Recovery Facility by IRWD's Principal Engineer, Steve Malloy, which included a virtual tour of the planned facilities; and a lively roundtable discussion by utility representatives and POTW representatives on electricity rates, programs and charges, as they relate to water/wastewater facilities.



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The roundtable panel, moderated by **Carollo's** Tom Mossinger, included POTW representatives: **Encina WA's** - Octavio Navarrete; **LACSD's** - Mark McDannel; **Eastern MWD's** - Dan Howell; **IRWD's** - Randy Lee; as well as Utility representatives: **SDG&E** Associate Account Executive - Kazeem B. Omidiji; and **SCE** Account Manager - James Pasmore Jr., who also provided a detailed presentation on SCE's rate structure and charges.

A copy of all presentations from this meeting can be found on the SCAP website [here](#).

Energy Management Committee Issues in 2014

Legislation and Regulations being followed

- Low Carbon Fuel Standard
- AB 1900 – CPUC implementation of policies for injection of biomethane into natural gas common carrier pipelines
- SB 1122 – CPUC implementation of the bioenergy feed-in tariff program
- Updates to the Renewables Portfolio Standard Guidebook
- Analysis and tracking of energy related bills
- Joining the newly formed Bioenergy Association of California
- Engaging with the CPUC on their water-energy nexus program development

Major Energy Issues in 2014

- CPUC establishment of a new Feed-In Tariff program
- CPUC establishment of policies for pipeline biomethane from POTWs
- Utility energy efficiency programs
- Power Purchase Agreements
- FOG and food waste digestion
- Changes to the Self-Generation Incentive Program (SGIP)
- Energy efficiency technologies
- Emissions control technologies
- Gas cleanup technologies
- CARB's Cap and Trade Program
- GHG Offsets
- Biogas generation technologies such as fuel cells and microturbines
- Wind and Solar Power
- Energy Storage
- Utility Interconnection Agreements

Other Issues

- Western Renewable Energy Informational System (WREGIS).
- NoxTech Technology
- CEC Funding opportunities
- Demand Response Programs
- Electric Program Investment Charge

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SGIP Program Extended

California's Self Generation Incentive Program (SGIP) was extended by SB 861. SB 861 authorizes collections for the SGIP through 2019 and authorizes administration of the SGIP through 2020. The CPUC is proposing to continue to collect \$89 million per year for the program. There may be additional changes to the SGIP funding levels over the next year as SB 861 also directs the CPUC to update the factor for avoided greenhouse gas emissions on or before July 1, 2015.

The SGIP provides incentives to support existing, new, and emerging distributed energy resources. The SGIP provides rebates for qualifying distributed energy systems installed on the customer's side of the utility meter. Qualifying technologies include wind turbines, waste heat to power technologies, pressure reduction turbines, internal combustion engines, microturbines, gas turbines, fuel cells, and advanced energy storage systems. Incentive levels vary for different technologies and applications. For example, a digester gas-fired CHP microturbine project would be eligible for \$2.08/kW.

Electric Program Investment Charge (EPIC) funding from the California Energy Commission (CEC)

The EPIC program is designed to assist in the development of non-commercialized new and emerging clean energy technologies in California, while providing assistance to commercially viable projects. It is essentially a replacement of the electricity portion of the PIER program, which was not renewed by the Legislature in 2011. The EPIC program administers an annual budget of \$162 million per year, which is awarded by the CEC and California's IOUs through competitive bidding processes. The EPIC funds are aimed at three areas: Applied Research, Technology Demonstration & Deployment, and Market Facilitation. Recently the CEC held two workshops to discuss the Second Triennial Investment Plan for 2015-2017, which discussed the objectives of the Investment Plan and the strategic initiatives to achieve those objectives.

Strategic initiatives in the Applied Research Area included co-digestion of organics, and developing and testing advanced water technologies and strategies to reduce energy use and costs in the water sector, such as advanced membrane filtration, water re-use, and demand response through operational changes. The CEC also discussed a strategic initiative under the Technology Demonstration and Deployment area to accelerate the demonstration and early deployment of emerging bio-digester and integrated clean generation for agricultural, municipal, and other organic wastes. The schedule calls for a CPUC decision on the second investment plan in December 2014.

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THE FUTURE

The Energy Management Committee will continue to conduct meetings quarterly or on an as-needed basis that will discuss: energy production as it relates to operation of existing facilities, new facilities and emerging technologies; energy efficiency as it relates to design and operation, and utility rebate incentive programs; and emerging markets as it relates to energy procurement and contracts, renewable energy credits and commodity prices.

Additionally, the Committee intends to schedule tours of various public facilities that incorporate both proven and new emerging technologies successfully used in energy recovery and production. Future meetings will seek to focus on a specific topic or facility tour that is relevant to a wide range of SCAP member agencies.

The Committee will continue to track new energy legislation and energy funding that is proposed and/or implemented. Committee members will be notified of relevant information at Committee meetings, through the *SCAP Monthly Update* or through email notifications.

The Committee will continue to work with CWCCG in advocating for wastewater industry energy issues, with the CPUC, and with other entities.

WATER ISSUES COMMITTEE

Al Javier
Eastern Municipal Water District
Chair

Rebecca Franklin
City of San Bernardino WD
Vice Chair

OVERVIEW

The Water Issues Committee continues to be actively engaged in significant and emerging issues on behalf of the Southern California Alliance of POTWs (SCAP). The Committee's mission is to represent its member agencies' views and interests to regulatory agencies, to develop position statements on regulatory issues, including commenting on emerging rules and policies, and to provide an informal forum for member agency dialogue between themselves and with regulatory agencies on emerging policy and regulations as they affect the POTW community.

Our appreciation is extended to former SCAP Water Issues Committee Chair, Jennifer Shepardson, who is stepping down as water committee vice chair after 3 years of serving in this capacity. Jennifer's time involvement contributions are much appreciated. Jennifer's role with the committee has been filled by her capable colleague, Rebecca Franklin, who has been involved with the water committee since 2011.

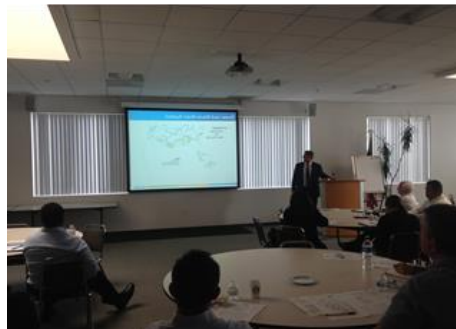
YEAR IN REVIEW

2014 Committee Meetings and Locations

The SCAP Water Issues Committee strives to meet quarterly or on an as-needed basis determined by the number and urgency of relevant regulatory issues. The Water Issues Committee has conducted 4 meetings this year.

The **first Water Issues Committee meeting** was held on March 30th at the offices of the Inland Empire Utilities Agency in Chino. The meeting included:

- An update by LACSD's Phil Markle regarding the Calleguas Creek NPDES permit and toxicity requirement; the SWRCB's Toxicity Plan; the statewide Freshwater Biological Objectives; and EPA's Ammonia Criteria;



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- An update by committee chair, Al Javier-EMWD, on the SWRCB's Industrial General Permit for stormwater;
- A presentation by Dudek's Bryn Evans entitled, "What does MS4 mean to you? A study of sewer and storm drain cross contamination";
- An update on the Unified Beach Water Quality Monitoring & Assessment Program for South Orange County by SOCWA's Brennon Flahive;
- Proposed changes to the statewide SSO-WDR by John Pastore; and
- A discussion of SSO WQ monitoring and testing costs by John Pastore.

The **second Water Issues Committee meeting** for 2014 was held on May 8th at OCSD in conjunction with the SCAP Biosolids Committee and the CASA regulatory workgroup (formerly Tri-TAC). At the General Session, Claudio Ternieden, Director of Regulatory Affairs from the Water Environment Federation, presented on some key legislative and regulatory initiatives WEF is tracking this year. He made a commitment to support CASA and SCAP.



The **third Water Issues Committee meeting** was held on September 23rd at the offices of the Irvine Ranch Water District's Michelson Water Recycling Plant in Irvine. A presentation was made by Assistant Director of Recycling Operations, Randy Lee, who provided a description of the Phase II Expansion components, including their new Membrane Reactor (MBR) and the Ultraviolet Light treatment facilities. A tour of the Plant and the Phase I Expansion facilities was also provide by IRWD Operations Manager, Gaspar Garza.

Also making a presentation at the meeting was Steve Delson, CEO of Gate 5 Energy Partners, Inc., who introduced the committee members to his company's Biosolids Management Alternative Process for producing renewable energy. Committee Chair, Al Javier, finished the meeting off with a regulatory update that included a significant contribution from LACSD's Phil Markle on pesticides and toxicity.



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The second half of the meeting included updates on the following topics:

- CEC pilot Study monitoring Plan.
- Biological Objectives.
- Nutrient Policy.
- REC1 Bacteria Objectives.
- SWRCB Regs on Petition for Review Process.
- Recycled Water WDR.
- Statewide Drinking Water NPDES Permit.
- Citizens Suit Reform.

The **fourth Water Issues Committee meeting** was held jointly with the SCAP Biosolids Committee and the CASA Regulatory Workgroup at OCSD on October 9th. The meeting included updates from all of the state's regional associations as well as legislative and regulatory updates from CASA's Adam Link. Issues discussed included:

- CECs Update
- Toxicity
- SWRCB CA Safe Drinking Water Plan
- Waters of the US Rule
- Federal Dental Amalgam Rule
- Ebola Update
- Central Valley Pyrethroid TMDL
- Resource Alignment/Cost of Compliance

Water Committee Issues in 2014

- SWRCB Draft Policy for Toxicity Assessment and Control (now re-designated as a Plan)
- Sediment Quality Objectives for Enclosed Bays and Estuaries.
- SWRCB Policy for Assessing Biological Integrity in Surface Waters.
- Advisory Panel for CECs in Coastal and Marine Ecosystems.
- General permit for Water Recycling.
- Regional MS4 Permit for Region 9
- Statewide Nutrient Policy.
- Statewide Mercury Program.
- Statewide Cadmium and Hardness Policy.
- Water Quality Standards Rule.
- Definition of Waters of the U.S.
- CIWQS Electronic Reporting Requirements.
- SWRCB Resource Realignment.
- Development of Model Water Softener Ordinance.
- Salt Management Studies.
- Mercury TMDL & Objective.

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SCAP files “Petition to Review” with SWRCB

On March 6th, 2014, the Los Angeles Regional Water Quality Control Board issued a new NPDES permit to the Calleguas Municipal Water District for the Regional Salinity Management Pipeline’s discharges to the ocean. According to SCAP attorney, Melissa Thorme – Downey Brand LLP, “instead of the 73 chronic toxicity unit (TUc) effluent limit included in the last permit, the new permit has “Pass/Fail” effluent limitations using USEPA’s Test of Significant Toxicity (TST) approach. Dischargers statewide are concerned about this new approach being mandated without any regulatory changes, and based solely on guidance documents. The Ocean Plan clearly sets the Chronic Toxicity objective as 1 TUc (pg. 7), and mandates that “[t]he Regional Water Board shall require the use of critical life stage toxicity tests specified in this Appendix to measure TUc” (pg. 50). Exceptions are only allowed after compliance with CEQA, and hearing and adoption by the State Water Board (Ocean Plan, pg. 27). Since the 2010 TST guidance was available when the Ocean Plan was reissued in 2012, this presents some evidence that the State Water Board did not intend to use the TST”.

On April 4th SCAP’s attorney, Melissa Thorme, filed a petition on behalf of SCAP for review of this permit with the State Water Resources Control Board. The petition focuses on the precedent being set by this permit, questions the legal authority for this new approach, and suggests that the TST approach be discretionary, instead of a mandate that is inconsistent with the approach set forth in the promulgated Ocean Plan. The cost for the appeal was funded by concerned SCAP members. The petition was immediately placed in abeyance until after the State Water Board has the broader conversation about how to regulate chronic toxicity in California.

SCAP files a lawsuit with EPA over improper approval of the Alternative Test Procedure for the two-concentration test for determining toxicity

On February 12, 2014, the State Water Board asked for USEPA Region IX approval of “a two-concentration test design when using the Test of Significant Toxicity (TST) hypothesis testing approach” SCAP’s members first learned of this ATP on May 8, 2014, when the NPDES permits for three (3) of SCAP’s members were reissued by the Regional Water Quality Control Board for the Los Angeles Region. Unlike the previous permits for these entities, the new versions of the permits included numeric effluent limitations for chronic toxicity, and required WET testing to determine compliance with these limitations using the two-concentration TST. Other SCAP and CVCWA members have permits in the queue to be re-adopted in the near future, and based on the new mandate in USEPA’s March 17, 2014 ATP Approval Letter, these permits will have the same requirements.

On June 25, 2014, SCAP filed a formal complaint with the U. S. District Court for Declaratory Judgment and Injunctive Relief contending that USEPA improperly approved the Alternative Test Procedure (ATP) for the two-concentration test when using the TST method. SCAP believed that a Temporary Restraining Order and preliminary and permanent injunctive relief would be necessary to protect Plaintiffs’ members from

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adverse consequences of USEPA's actions until this case can be heard on the merits. SCAP subsequently filed for injunctive relief with the Courts but its petition was denied.

On November 12th, SCAP filed a motion for a summary judgment on the case and must await the Court's determination.

In October, the Los Angeles County Sanitation Districts were issued tentative NPDES permit requirements by the Los Angeles RWQCB for their Whittier Narrows and Pomona WRPs that included numeric limits for toxicity as well as the mandated usage of the two-concentration test method using the TST test approach. SCAP joined CASA and the LACSD staff in testifying before the LARWQCB at the November 6th hearing but were unsuccessful in the permit requirements modified by the Board.

Waters of the U.S. Fact Sheet (courtesy of NACWA)

The U.S. Environmental Protection Agency (EPA) and U.S. Army Corps of Engineers (Army Corps) jointly released a proposed rule in April seeking to clarify which water bodies are subject to the Clean Water Act (CWA). NACWA had urged EPA to pursue any changes to CWA jurisdiction via a formal rulemaking process instead of via a guidance document, as was the past approach. NACWA has also long advocated for maintaining the waste treatment system exemption in any new jurisdictional rule, and this proposal does just that.

EPA and the Army Corps contend that the rule does not expand the reach of the CWA to include any new types of waters that have not historically been covered under the Act and is consistent with the Supreme Court's more narrow reading of CWA jurisdiction. The draft rule has many components, but below are the key elements from the perspective of the municipal clean water community that NACWA has identified, that will guide our comment development. Other national municipal organizations have expressed concerns about the potential of the rule to have a limiting effect on economic development. We hope this information will also help inform those Member Agencies developing their own comments on the rule or who may be dealing with this issue with their own Boards or other local elected or appointed officials, while NACWA completes its official comments.

Key Elements for the Clean Water Community

The draft rule:

- Maintains and clearly articulates an exemption for waste treatment systems designed to meet the requirements of the CWA.
- Exempts groundwater from federal jurisdictional reach.
- Does not change the regulatory status of water transfers.
- Excludes certain ditches that are located in upland areas with less than perennial flow from jurisdiction. Other ditches would be evaluated on a case-by-case basis for jurisdiction. However, the draft rule is not clear on what would qualify as an "upland" area. The draft rule's general treatment of ditches has caused significant confusion and is in need of clarification (see below).

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- Exempts discharges incidental to stormwater runoff from lands that may be used for biosolids application under the agricultural stormwater discharge exemption.

Clarifications NACWA Will Seek

- The final rule must clarify that municipal separate storm sewer systems (MS4s) are covered by the waste treatment system exemption and will not be jurisdictional under the CWA above any existing point of permitted discharge, including any ditches that are part of an MS4.
- The draft rule is very confusing on its treatment of ditches, including which ditches will be specifically excluded from jurisdiction. Greater clarity on this point is needed, especially regarding how ditches could impact jurisdictional determinations for MS4s.
- EPA has verbally stated that the proposed rule is not intended to make green infrastructure (GI) installations jurisdictional, indicating that any GI installation or GI practice designed to meet CWA obligations or achieve water quality goals is not meant to be included. However, EPA and the Army Corps need to specifically clarify this in the final rule.
- The draft rule does not address the issue of recycled water projects, in particular those using wetlands to treat millions of gallons of water a day. EPA and the Army Corps must clarify the regulatory exemption of these recycled water projects.
- Differences in how states have implemented CWA jurisdiction in the past raise concerns about how the new rule will interface with existing state practice. This results in the perception that the rule is, contrary to EPA/Army Corps claims, expanding federal jurisdiction. EPA and the Army Corps will need to address this issue in the rule preamble.
- Concerns have been raised regarding a potential increase in federal enforcement over sanitary sewer overflows (SSOs) that previously would not be considered jurisdictional (for example, discharges into ditches that are not currently be considered a WOTUS). NACWA is exploring the implications of the rule on SSOs.

Comments for Docket ID No. EPA-HQ-OW-2011-0880 were originally due on July 21. However, interest groups filed requests for extension, to which EPA and the Army Corps responded with an extension, making the new comment deadline November 14, 2014.

THE FUTURE

The Water Issues Committee continues to actively monitor and work on water policy and regulatory issues affecting member agencies. The Water Issues Committee will continue to hold regular quarterly meetings to update its membership on regulatory issues.

During the next calendar year, the Water Issues Committee will continue to monitor any new developments associated with regulatory issues such as: the proposed Whole Effluent Toxicity Plan; Water Quality Improvement Initiatives, including Numeric

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Nutrient Endpoints for Ammonia; Constituents of Emerging Concern; Sediment Quality Objectives; and water softener restrictions.

The Water Issues Committee will also be monitoring developing state and federal legislation in the areas of water quality enforcement, water recycling, constituents of emerging concern, and bond programs and other funding sources.

WASTEWATER PRETREATMENT COMMITTEE

Jim Colston
Orange County Sanitation District
Chair

Barbara Sharatz
City of San Diego
Vice Chair

OVERVIEW

The Wastewater Pretreatment Committee was formed in January 2012 to provide a routine forum for members to exchange information about industrial and non-industrial pretreatment issues. To review developing federal regulations related to the pretreatment program and to discuss federal and local compliance activities for pretreatment programs, including Pretreatment Compliance Inspections.

YEAR IN REVIEW

2014 Committee Meetings and Locations

The Wastewater Pretreatment Committee meets quarterly or on an as-needed basis. There Pretreatment Committee conducted 2 meetings in 2014.

The first meeting of the Wastewater Pretreatment Committee was held on March 4th at the Inland Empire Utilities Agency. The meeting included: The meeting featured a presentation by Dennis Doherty from Doherty Tech, Inc., who provided information on maintenance and inspection of grease removal systems. He also showcased the GOSLYN GRD and discussed its features in comparison to other devices such as the Big Dipper.



Committee Chair Jim Colston and staff from OCSD updated the group on news items and regulatory issues, including the latest on the dental amalgam rule, OCSD's recent Pretreatment Compliance Inspection and highlights from the CWEA P3S Conference.

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Vice Committee Chair Barbara Sharatz from the City of San Diego led an open discussion about cost recovery of costs from pretreatment programs in light of Prop. 218 and Prop. 26 requirements.

The **second Wastewater Pretreatment Committee meeting** was held on September 30th at the offices of the Inland Empire Utilities Agency in Chino. The featured speaker was Julio Lara from the RWQCB-Santa Ana Region, who provided an overview of SWRCB's POTW Pretreatment Program Requirements. A copy of the presentation that was prepared by SWRCB's Russell Norman, can be found on the [SCAP website](#) along with the following handouts:



Wastewater Pretreatment Committee Issues in 2014

- Emerging pollutants/SWRCB Requirements for CECs
- Federal dental amalgam rule
- Nano technology
- Water Softeners/TDS local limits
- Local limits review/establishment
- Pretreatment software
- Compliance audits/inspections
- Outsourcing pretreatment program
- Green chemistry
- Salinity management
- Pretreatment inspection and monitoring (fieldwork)
- Medical industry/hospitals
- Groundwater recharge
- Home plating operations
- Fee/funding for pretreatment programs
- Other issues such as: infectious waste, pump stations/rag problems, Industrial Pretreatment Operator Training/Certification

Dental Amalgam Rule

EPA is proposing technology-based pretreatment standards under the Clean Water Act for discharges of pollutants into publicly owned treatment works (POTWs) from existing and new dental practices that involve the discharge of dental amalgam. The proposal would require dental practices to comply with requirements for controlling the discharge of dental amalgam pollutants into POTWs based on the best available technology or best available control technology and Best Management Practices.

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EPA is also proposing to amend selected parts of the General Pretreatment Regulations (40 CFR Part 403) to streamline oversight requirements for the dental sector. EPA expects compliance with this proposed rule would reduce the discharge of metals to POTWs by at least 8.8 tons per year, half of which is mercury. EPA estimates the annual cost of the proposed rule would be \$44 to \$49 million.

The proposed rule would require all affected dentists to control mercury discharges to POTWs by reducing their discharge of dental amalgam to a level achievable through the use of the best available technology (amalgam separators) and the use of Best Management Practices. In order to simplify compliance with, and enforcement of the numeric reduction requirements, the proposed rule would allow dentists to demonstrate compliance by installing, operating and maintaining amalgam separators.

The proposal also includes a provision by which dental offices that have already installed amalgam separators that do not meet the proposed amalgam removal efficiency would still be considered in compliance with the rule for the life of the amalgam separator. Removing concentrated sources of mercury to POTWs opportunistically, such as through low-cost amalgam separators at dental offices (average annual cost per dental office: \$700), is a common sense solution to managing mercury that would otherwise be released to air, land, and water. A hearing on this rule was scheduled for November 10, 2014, however, a 60-day extension was granted extending the comment period at the request of the Summit Partners and NACWA.

THE FUTURE

The Wastewater Pretreatment Committee will continue to hold regular meetings to update its membership on regulatory issues and to provide a forum for roundtable discussions of relevant and timely industrial and non-industrial pretreatment issues.