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STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

In the Matter of Review of Order)
No. 79-35, Waste Discharge)
Requirements for the Leucadia)
County Water District Issued by) Order No. WQ 79-28
the California Regional Water)
Quality Control Board, San)
Diego Region. Our File No. A-244.)
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BY THE BOARD:

On May 21, 1979, the California Regional Water Quality Control Board, San Diego Region (Regional Board) adopted Order No. 79-35. The Order prescribes waste discharge requirements for the Leucadia County Water District's (Leucadia CWD) Forrest R. Gafner Water Reclamation Plant. On June 28, 1979, the Rancho La Costa Residents' Association (Association) submitted a petition for review of the Regional Board's Order. This petition was not filed in a timely manner in accordance with the Board's regulations. However, because of the obviously controversial nature of the Regional Board action, the State Board agreed to review the matter on its own motion on June 19, 1979.

I. BACKGROUND

The Leucadia CWD was formed in 1959 for the purpose of providing public sewerage facilities for the community of Leucadia. In 1961, the Leucadia CWD entered into agreement with Rancho La Costa, Inc., for reclamation and reuse of 0.75 mgd of effluent on the La Costa Golf Course. The basic sewerage system consisting

of trunk sewers, pump stations, force mains, and the Forrest R. Gafner treatment facility were placed into operation in 1962. During the years 1962 through 1975, the treatment facility was operated and provided water for irrigation of the golf course.

On August 18, 1967, the Regional Board issued Resolution 67-E21, a cease and desist order against the Leucadia CWD and Rancho La Costa, Inc., for violation of waste discharge requirements. The cease and desist order was issued for instances of bypassing inadequately treated wastewater and for failure to keep reclaimed water confined to the reuse site.

The cease and desist order remained in effect until June 14, 1976, when it was rescinded because the Leucadia CWD had arranged for a connection to the Encina Water Pollution Control Facility. At the same time the Regional Board rescinded the waste discharge requirements (Order 61-R7) for the Gafner Treatment Plant. The Encina Water Pollution Control Facility is a regional sewerage facility which provides primary treatment with discharge through an offshore outfall to the Pacific Ocean.

The Gafner Treatment Plant was temporarily taken out of service in March 1975, after completion of transmission facilities to the Encina Plant. Since 1977, the Gafner plant has been used for storage to provide flow equalization for the Leucadia pumping station. Connection to the Encina Plant provided service for approximately 22,500 persons within the Leucadia CWD boundary.

The Leucadia CWD area is a prime residential area which has experienced a considerable demand for additional residential development. The demand for development has exceeded the available sewerage capacity. The District estimated that approximately 21,000 persons were served by the District facilities in

November, 1978. The Leucadia CWD recognizing that the growth was rapidly exceeding available service capacity placed a moratorium on the issue of new service agreements. However, existing services and commitments prior to the moratorium amount to approximately 39,000 persons.

In 1977, the Leucadia CWD expressed interest in utilizing the inactive 0.75 mgd Gafner Treatment Plant. The proposal was to start the secondary treatment facility and produce reclaimed water which would be utilized as it had in the past on the La Costa Golf Course. In March, 1979, the Leucadia CWD produced a final Environmental Impact Report (EIR) for the proposed project and submitted a report of waste discharge to the Regional Board.

The proposal was to:

1. Reactivate the 0.75 mgd secondary treatment plant.
2. Bypass all sludge to the Encina Facility for treatment and eventual disposal.
3. Provide the water thus reclaimed to the La Costa Golf Course for irrigation.
4. Provide a back-up system for utilizing the treatment and disposal facilities at the Encina Plant.

As a result of public comment on the draft EIR, the Leucadia District further committed themselves to covering the head-works, primary clarifier, and trickling filters. Air would be drawn from these units and the presently operating pump station and treated using a soil filter bed and back-up activated carbon filter to remove any offensive odors.

Reactivation of the Gafner plant would provide 270 acre-feet per year of irrigation water and sewerage capacity for approximately an additional 7,500 persons.

II. FINDINGS

The petition submitted by the Association alleges that the Regional Board failed to address the problem of the reactivated plant producing offensive odors which would adversely affect nearby residential areas. They asserted that the Leucadia District has had a poor record and that there have been offensive odors in the past from the Gafner plant or pump station.

A review of the record indicates that the nearest residence to the Gafner plant is at a distance of approximately 1200 feet. The Leucadia CWD has proposed an odor control program consisting of covered units with air scrubber facilities.

La Costa Development Company, which owns adjacent lands and obviously has a great interest in assuring that there are no nuisances resulting from the proposed project, hired Lowry Associates Consulting Civil Engineers to evaluate the odor control proposals of Engineering Science, Inc., consultants to Leucadia CWD. Lowry Associates concluded:

"It is my opinion that the existing Leucadia CWD plant will not be a source of odors if the program proposed by Engineering Science is fully and properly implemented."

The covering of exposed units and collection and scrubbing of air exposed to these units represents the best technology for dealing with odor problems associated with wastewater treatment plants. It is technology which is generally only applied in the most severe cases and where demonstrated problems exist. It is also a technology which has proven to be effective.

However, as with any mechanical piece of equipment such a system is not immune to failure. The Leucadia CWD has proposed to provide for connection to the Encina treatment and disposal system. Thus, in the event of a breakdown either in the reclaimed water treatment plant or the plant's odor control system waste may be diverted to the Encina facility for treatment and disposal. This independent back-up means of treatment and disposal provides additional assurance that odors will not cause problems for residents in the La Costa area.

The reclaimed water will be a well oxidized secondarily treated effluent and a 2.0 mg/l dissolved oxygen level must be maintained in the proposed storage lake located on the golf course. Such treatment and dissolved oxygen requirements are sufficient to prevent odors.

The Leucadia CWD proposed and the Regional Board required that no sludge be treated or disposed of at the Gafner plant site. This absence of solids handling further eliminates the potential for any odor nuisance.

A review of the self monitoring program indicates that considerable monitoring is required of the 0.75 mgd flow. Twenty-four hour composite sampling of the flow is required three times per week. These samples will be analyzed for biochemical oxygen demand and total suspended solids, key operational parameters for a secondary type treatment facility. The self monitoring required is ample to indicate compliance with the waste discharge requirements. However, Leucadia CWD should be required to report in a qualitative way any instances of odors.

The Leucadia CWD should develop a routine procedure to qualitatively appraise the presence or absence of odor from the treatment facility. Because of the controversial nature of the project, the development of such a program should be done in cooperation with home owners in the area which would be most likely impacted if any unforeseen problem should arise. The program should be approved by the Regional Board Executive Officer and the results from such a program should be reported with self monitoring reports submitted by the Leucadia CWD.

There is nothing in the waste discharge requirements (NPDES permit) for the Encina Joint Facility which would prohibit the proposed intertie with the Gafner Treatment Plant. Thus, no modification of the Encina Permit is required.

The Association stated in their petition that the waste discharge requirements should not have been issued to Leucadia CWD until Leucadia CWD has entered a contract with the La Costa Land Company for the use of the reclaimed water. This argument presents a "chicken-egg" situation. The discharger must know the waste discharge requirements which will apply in order to conduct appropriate physical and financial planning. It would not be practical to enter into contractual arrangements prior to knowing the actual restrictions which would be imposed by regulatory agencies. Thus, this contention of the Association is without merit.

III. CONCLUSIONS

After review, we conclude the waste discharge requirements contained in Regional Board Order No. 79-35 are appropriate. The self monitoring program No. 79-35 is generally appropriate, but should be modified to require Leucadia CWD to report in a qualitative fashion any presence of odors at or beyond the treatment plant site.

IV. ORDER

IT IS HEREBY ORDERED that the Leucadia CWD prepare a qualitative program for monitoring the presence or absence of odor at the treatment plant site, the water reuse site, and surrounding residential and commercial areas. This program shall be developed by Leucadia CWD in cooperation with the home owners in the vicinity of the plant. Leucadia CWD shall select at least two home owners in the area of probable impact should an odor problem arise to directly participate with the District in development of the program. The program shall be submitted to the Executive Officer of the Regional Board for approval and inclusion in the self monitoring program. The results from the program shall be reported by the District in self monitoring reports submitted to the Regional Board.

Dated: AUG 16 1970



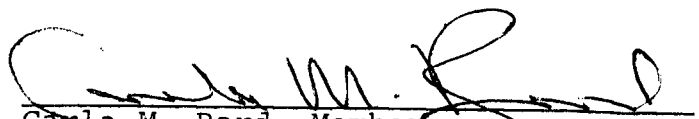
W. Don Maughan, Chairman

ABSENT

William J. Miller, Vice Chairman



L. L. Mitchell, Member



Carla M. Bard, Member

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