

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

STAFF REPORT FOR REGULAR MEETING OF SEPTEMBER 21-22, 2017

Prepared on June 15, 2017

ITEM NUMBER: 13

SUBJECT: Revision of Waste Discharge Requirements, Reissuance of National Pollutant Discharge Elimination System Permit No. CA0049964 for South County Regional Wastewater Authority, Santa Clara County, Order No. R3-2017-0028

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KEY INFORMATION

Location: 1500 Southside Drive, Gilroy, CA 95020
Place ID: 256039
Type of Discharge: Secondary-treated domestic wastewater and tertiary disinfected recycled water
Permitted Flow: 8.5 MGD Secondary-Treated Discharge, 9.0 MGD Recycled Water
Type of Treatment: Biologic treatment in oxidation ditches, secondary clarification. Recycled water is filtered and disinfected.
Disposal Method: Pipe to Pajaro River
Solid Wastes: Offsite disposal biosolids
Existing Orders: Waste Discharge Requirements (WDR) Order No. R3-2010-0009; Statewide General WDR for Sanitary Sewer Systems (State Water Board Order No. 2006-0003-DWQ); and Order WQ 2014-0057-DWQ/NPDES General Permit No. CAS000001, General Permit for Storm Water Discharges Associated with Industrial Activities

This Action: Adopt Order No. R3-2017-0028

SUMMARY

This agenda item considers the reissuance of an existing NPDES permit. The Fact Sheet, Attachment F of the proposed Order, includes the legal requirements and technical rationale that serve as the basis for the requirements of the permit. Water Board staff recommends adoption of the proposed Order.

DISCUSSION

South County Regional Wastewater Authority treats and disposes of wastewater from the cities of Gilroy and Morgan Hill. Most wastewater is disposed of into percolation ponds. In wet weather when the percolation ponds are at capacity, the NPDES permit allows effluent to be discharged to the Pajaro River. The Discharger has never discharged to the river. The facility

also supplies recycled water for irrigation of food crops and landscaping. The Fact Sheet attached to the draft permit provides details regarding operation of the facility.

Changes from the Existing Order

The proposed Order is structured in accordance with the statewide NPDES permit template. The proposed Order is consistent with the previous Order with the exception of the following changes and modifications:

- SCRWA is in the process of changing from chlorine disinfection to ultraviolet light (UV). The Division of Drinking Water has approved the new system to operate at flows up to 8.0 million gallons per day (MGD). SCRWA hopes to get approval soon for flows up to 9.0 MGD. The draft permit includes provisions to regulate both chlorine and UV disinfection.
- Staff added specifications and monitoring requirements to regulate production of recycled water. Currently, recycled water production is regulated by separate master water reclamation requirements. Including recycled water production specifications will allow the Water Board to terminate the master requirements and enroll the Discharger in the statewide general order for recycled water, which includes the most current standards for recycled water use.
- Updated flow schematic (Draft Order, Attachment C).
- Updated monitoring periods and reporting schedule to be consistent with the CIWQS reporting requirements entry system. No substantive changes result from this update; it is only to facilitate regulatory measure entry into CIWQS.
- The draft permit includes more recent toxicity reduction and monitoring requirements, consistent with USEPA's whole effluent toxicity methods.
- The draft monitoring requirements allow the Discharger to select new upstream and downstream Pajaro River monitoring locations. The locations specified in the previous permit were not safely accessible in wet weather.
- Added monitoring requirements for chlorohpyll, phosphorus, and orthophosphorus to comply with a TMDL adopted since the last permit. Added monitoring requirement for trihalomethanes, which are chlorination byproducts, as required by the reasonable potential analysis.
- Added a requirement to determine groundwater flow directions.

Compliance History

The SCRWA facility is generally well run and produces good effluent. SCRWA has reported occasional violations of receiving groundwater limitations for sodium, chloride, and manganese. SCRWA has also reported various other minor violations. During the wet 2017 winter, operators used percolation ponds before they were allowed to dry to field conditions as required by the permit and had occasional freeboard violations. The Discharger viewed these conditions as preferable to implementing the river discharge.

COMMENTS

The Water Board notified the Discharger and interested agencies and persons of its intent to prescribe WDRs for the discharge and provided an opportunity to submit written comments and recommendations. Notification was provided through publication in the San Jose Mercury News on July 28, 2017, posting on the Water Board's website, and posting at the facility.

The written comments were due at the Water Board office by 5:00 p.m. on July 26, 2017. Water Board staff received an email from the Discharger during the public comment period with two minor comments as follows:

1. In footnote 3 to Table E-8 in the MRP, page E-18, monitoring location GW-20 is unnecessarily listed twice; and
2. There is an inconsistency between the word "reportable" used on page 19 of the Permit (Section VII Compliance Determination, A. General, "...effluent limitations for reportable pollutants...") and the word "priority" used on page E-23 of the MRP (Section XI.B.5.a Compliance Determination, "...effluent limitations for priority pollutants...").

Response: Water Board staff removed the duplicate groundwater monitoring location from Table E-8. Water Board staff replaced the word "priority" on page E-23 with the word "reportable" to be consistent with the language in the permit on page 19.

RECOMMENDATION

Adopt Order No. R3-2017-0028, as proposed.

ATTACHMENT

For copies, please refer to the Central Coast Water Board's internet website at:

http://www.waterboards.ca.gov/centralcoast/board_info/agendas/2017/2017_agendas.shtml

1. Proposed Order No. R3-2017-0028, including the following associated attachments:

- Attachment A – Definitions
- Attachment B – Map
- Attachment C – Flow Schematic
- Attachment D – Standard Provisions
- Attachment E – Monitoring and Reporting Program (MRP)
- Attachment F – Fact Sheet