

ITEM: 13

SUBJECT: City of Williams (Discharger) Wastewater Treatment Plant, Colusa County

BOARD ACTION: *Consideration of Order Amending Waste Discharge Requirements Order No. R5-2008-0185*

BACKGROUND: The Central Valley Regional Water Quality Control Board (Central Valley Water Board) adopted Waste Discharge Requirements Order No. R5-2008-0185 (NPDES Permit) on 5 December 2008 for the City of Williams Wastewater Treatment Plant (Facility) in Colusa County. The existing Facility currently discharges secondary treated effluent to Salt Creek, a tributary to Freshwater Creek, which is tributary to the Colusa Basin Drain within the Sacramento River Watershed. The NPDES Permit requires the Discharger to upgrade its Facility to provide tertiary and Title 22-level treatment.

The proposed Order amends the NPDES Permit. The proposed Order provides a time schedule for continuous chlorine effluent monitoring by changing the Total Residual Chlorine monitoring sampling requirement to daily grab sampling on an interim basis, until the Discharger completes its current compliance project. In addition to providing tertiary treatment, the compliance project will replace the chlorine disinfection system with an ultraviolet light (UV) disinfection system. (The project is scheduled to be completed by 1 October 2010.) The Facility does not currently contain the equipment necessary to perform continuous total residual chlorine monitoring. Therefore, since the chlorine disinfection system is to be replaced, it is not prudent to require construction of a new continuous chlorine monitoring system for the short period while the compliance project is underway.

ISSUES: The California Sportfishing Protection Alliance (CSPA) submitted public comments regarding the proposed Order amending the NPDES Permit. The issues discussed in the public comments are summarized below followed by Central Valley Water Board staff responses.

CSPA Comments

Designated Party Status: CSPA requested designated party status for the Central Valley Water Board hearing scheduled for 12/13/14 August 2009 with regard to the proposed Order amending the NPDES Permit for the Facility. The commenter will be granted designated party status for the subject hearing.

Chlorine Sampling During Use of Chlorine for Non-Disinfection Purposes: The Discharger has a long history of using chlorine at the wastewater treatment plant headworks for odor control. Chlorine is frequently utilized at tertiary plants for filter backwash. Chlorine is also routinely used for washdown and collection system odor control. Before eliminating the requirements to conduct sampling for chlorine; the Central Valley Water

Board should require discontinuation of all chlorine uses throughout the treatment and collection system.

The Central Valley Regional Board staff agrees that, even after discontinuation of the chlorine disinfection system, chlorine residual monitoring should be required because chlorine may be used for non-disinfection purposes. The proposed Order does not eliminate the requirement for the Discharger to conduct sampling for chlorine. Grab sampling for chlorine is proposed to be required during events in which chlorine is used, such as for odor control, filter backwashing, and washdowns, before and after the UV system is operational.

The Discharger must be ELAP certified: The holding time for chlorine samples is extremely short, which prohibits using a commercial laboratory. Therefore, the Discharger must be ELAP certified according to California Water Code Section 13176 (CWC).

CWC Section 13176 states:

- (a) The analysis of any material required by this division shall be performed by a laboratory that has accreditation or certification pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code [Environmental Laboratory Accreditation Program, or ELAP].
- (b) No person or public entity of the state shall contract with a laboratory for environmental analyses for which the State Department of Health Services requires accreditation or certification pursuant to this chapter, unless the laboratory holds a valid certification or accreditation.

Grab sampling involves taking field measurements using a hand-held meter. Staff is not proposing to amend the provisions of the MRP regarding laboratory requirements, and does not agree that the change from continuous chlorine monitoring to grab sampling affects section 13176 compliance. This comment is outside the scope of the permit reopener. Staff may provide additional information about section 13176 at the hearing.

Mgmt. Review _____
Legal Review LTO

13 August 2009
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