

ITEM: 9

SUBJECT: City of Galt, Wastewater Treatment Plant and Reclamation Facility, Sacramento County

BOARD ACTION: *Consideration of NPDES Permit Renewal (NPDES Permit No. CA0081434), Adoption of Time Schedule Order, and Adoption of Separate Waste Discharge Requirements*

BACKGROUND: The City of Galt (Discharger) owns and operates the City of Galt Wastewater Treatment Plant and Reclamation Facility (Facility), a publicly owned treatment works (POTW) located at 10059 Twin Cities Road, Galt, California. The Facility provides sewerage service for the City of Galt and surrounding area, serving a population of approximately 24,000. The Facility provides tertiary treatment for up to 3.0 million gallons per day of tertiary treated wastewater to surface waters. Tertiary treated wastewater from the Facility is discharged to Laguna Creek, a water of the United States. Additionally, undisinfected secondary treated wastewater is applied to the Discharger's land application area during the growing season in order to irrigate non-food crops. The United States Environmental Protection Agency and the Central Valley Water Board (Board) have classified this discharge a major discharge.

Discharges from the Facility are currently regulated by Waste Discharge Requirements Order R5-2010-0099. The Discharger requested separate permits for the land application and discharges to surface water. Two new Orders are proposed to: 1) renew the NPDES permit for discharges to Laguna Creek, and 2) adopt separate Waste Discharge Requirements for reclamation activities. The proposed NPDES permit renewal allows for an increase in the discharge from 3.0 MGD, in the current permit, to 4.5 MGD should the Discharger complete Facility improvements, comply with all effluent and receiving water limitations, and formally request and receive approval for an increase in the permitted discharge. The proposed NPDES permit renewal includes new or revised effluent limitations for ammonia and zinc. In addition, the effluent limitations for aluminum, carbon tetrachloride, chlorodibromomethane, copper, cyanide, dichlorobromomethane, lead, iron, and manganese have been removed, because the discharge does not demonstrate reasonable potential to cause or contribute to an instream exceedance of the applicable water quality objectives. The proposed permit includes effluent limitations for arsenic, nitrate plus nitrite, and zinc that the Facility cannot immediately comply. Therefore, a Time Schedule Order is also proposed allowing a time schedule for the Discharger to comply with these effluent limitations.

The proposed Waste Discharge Requirements for reclamation activities are essentially the same as found in Order R5-2010-0099, except for minor changes to the monitoring requirements and updates related to recent upgrades to the Facility.

ISSUES: A Notice of Public Hearing was sent to the Discharger and interested parties on 16 September 2015 for a 30-day public comment period. Public comments on the tentative Orders were received on 19 October 2015 from the Discharger and the Central Valley Clean Water Association (CVCWA). Detailed comments and responses are included in the Staff Response to Comments document included in the agenda package. The following is a summary of the comments on the major permitting issues and Central Valley Water Board staff responses.

NPDES Permit Renewal

Annual Mass Based Limit for Mercury. The Discharger and CVCWA both requested that the total mercury mass limitation of 0.05 pounds/year be removed from the proposed NPDES Permit. The Discharger and CVCWA cited a finding of no reasonable potential reported in the Discharger's report of waste discharge, and no discussion in the Fact Sheet explaining why an effluent limitation for mercury is necessary.

Central Valley Water Board staff does not concur. Mercury bioaccumulates in fish tissue and Laguna Creek is tributary to the Sacramento – San Joaquin Delta, which is impaired for mercury. Therefore, the discharge of mercury to the receiving water may contribute to exceedances of the Basin Plan's narrative toxicity objective and impact beneficial uses. The proposed NPDES Permit carries forward a performance-based loading limit to control the discharge of mercury. The Fact Sheet has been updated to reflect these findings.

Separate Waste Discharge Requirements (WDR's)

Additional Time to Comply with Land Application Area Storm water Runoff Containment Requirements. The Discharger and CVCWA requested that Central Valley Water Board staff remove the prohibition of discharge of storm water runoff from the Reuse Area to off-site land or surface water, as contained in Section VI.C.3.d.viii of the Limitations and Discharge Requirements portion of the tentative WDR's, or allow an additional 5 years (1 January 2025) for the Discharger to comply with the prohibition and conduct a Pathogen Risk Study.

The Discharger land applies "Undisinfected Secondary" recycled water and biosolids to agricultural fields surrounding the Facility in accordance with Title 22 requirements. The discharge of storm water runoff may contain pathogens, therefore, the discharge prohibition is necessary to protect public health. Central Valley Water Board staff concurs with the request to extend the final compliance date to 1 January 2025.

Land Application Area Specifications. CVCWA has requested that the proposed WDR's remove specifications for warning sign spacing and setback requirements that are not consistent with California Code of Regulations Title 22. Central Valley Water Board staff concurs regarding the spacing requirements for perimeter signs. However, although some setback requirements are more stringent than required by Title 22, the requirements are included in the proposed WDR's based on engineering judgment to protect public health, assure nuisance conditions are not created, and to protect surface water quality. The Fact Sheet of the proposed WDR's has been updated to provide the appropriate rationale for these requirements.

Total Nitrogen Groundwater Limit. The Discharger and CVCWA have requested that the groundwater limitation for total nitrogen of 10 mg/L be removed from the proposed WDR's. The Discharger and CVCWA contend that there are no water quality objectives for total nitrogen and is not necessary, because a limit for nitrate is included. Central Valley Water Board staff concurs and has modified the proposed WDR's accordingly.

RECOMMENDATION: Adopt NPDES Permit Renewal, Separate Waste Discharge Requirements, and Time Schedule Order

Mgmt. Review __NM_____

Legal Review _____NJ_

10/11 December 2015

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