

Administrative Civil Liability Complaint (ACL) # R1-2014-0035 City of Fort Bragg

A summary of the City of Fort Bragg's proposal utilizing Mandatory Minimum Penalties to correct the underlying causes of effluent violations (Biochemical Oxygen Demand, 5 day demand- BOD₅ and Total Suspended Solids- TSS) of the Waste Discharge Requirements (WDRs) for the Fort Bragg Municipal Improvement District No. 1 Waste Water Treatment Facility as described in Administrative Civil Liability Complaint No. R1-2014-0035.

One of the major difficulties with our current WWTF is the ongoing operation of the old trickling filters. Retiring these process units and replacing them with an activated sludge system will resolve the Total Suspended Solids (TSS) and Biochemical Oxygen Demand (BOD₅) exceedances.

The City of Fort Bragg is preparing to implement a major upgrade of its Waste Water Treatment Facility (WWTF). The current two-stage trickling filter treatment process will be replaced by one utilizing activated sludge. The existing plant was constructed in 1970 and regularly improved. However after over 40 years of operation, much of the plant has exceeded its normal operating life. Consequently, a new activated sludge treatment train will replace major portions of the existing WWTF. Remaining operating units will be similarly renewed or upgraded.

The City proposes to apply the Mandatory Minimum Penalty (MMP) of \$63,000 imposed by ACL #R1-2014-0035 toward the cost of designing the WWTF upgrade to help expedite this task. This design work is estimated to be about \$750,000. At this time, no grant or other disallowed funding has been allocated to this work.

- 1) The facility must be a Publicly Owned Treatment Works serving a small community (defined as serving 10,000 or fewer persons or a rural county, with a financial hardship);

The City of Fort Bragg has a population of 7,350 (January 1, 2014; California Department of Finance estimate). The City is designated as a Severely Economically Disadvantaged Community by the American Community Survey.

- 2) CP is designed to correct the violations within 5 years;

An extensive pre-design investigation was completed in September 2013, the "Fort Bragg Improvement District No. 1 Predesign Study for Fort Bragg Wastewater Treatment Plant Upgrade Project – Predesign Summary Report". Design is ready to be undertaken during the 2014-15 fiscal year. Construction is anticipated to begin by 2016 and take approximately 2 years to complete. This would put the new WWTF on-line in 2018. Consequently, the work should be completed in approximately four years.

The next step is to issue a Request for Proposals (RFP) for the WWTF upgrade design contract. This will build off the recent predesign study. The study developed design criteria and recommendations for the major elements of the upgrade project.

A key project element being upgraded is the switch to a two-step activated sludge treatment process. The existing primary and secondary clarifiers will be retired. In addition, the aging trickling filters will be abandoned and removed. The new treatment train will reliably meet effluent limits in a more cost effective manner. A similar system in Rio Dell, California has been performing well.

The following is a more detailed time table for accomplishing the design phase of the project:

<i>Complete</i>	Prepare RFP
<i>Complete</i>	Issue RFP
<i>Complete</i>	Close RFP
June 15, 2016	Select designer, begin design work
April 30, 2016	Plans, Specifications and Estimate (PSE) complete

The MMP would be expended in the course of the design phase, during the first half of 2015.

Environmental review and permitting will proceed on a parallel track. Given the extra effort to secure approvals in the coastal zone, additional time has been set aside for these tasks. Construction is tentatively scheduled for summer 2016.

3) A financing plan has been prepared to complete the CP;

In its current budget, the City has allocated funds in the amount of \$750,000 for the design of the new WWTF improvements and to also prepare bid documents. Construction will be funded by a combination of local funds and Clean Water State Revolving Funds (CWSRF).

4) CP meets the criteria in the Enforcement Policy.

Upon reviewing the enforcement policy for Compliance Projects (CPs), the City believes the criteria will be met. The key provisions have been discussed in the paragraphs above. The City wishes to pursue a CP as this would most effectively use the ACL MMP. It appears that the proposed project would also meet the criteria for a Supplemental Environmental Projects (SEPs); however the City does not wish to pursue this option at this time.