

ITEM: 8

SUBJECT: Strathmore Public Utility District, Wastewater Treatment Facility, Waste Discharge Requirements, Tulare County

BOARD ACTION: *Consideration of Waste Discharge Requirements*

BACKGROUND: The Strathmore Public Utility District (District) currently operates a wastewater treatment facility (Facility) regulated under Waste Discharge Requirements Order No. 85-024. The Facility consists of a wet well with grinder, two lift pumps, a clarigester, two oxidation ponds, six evaporation/percolation ponds, and two unlined sludge drying beds. The Facility was built in 1950, and cannot consistently meet applicable regulatory requirements.

The proposed WDRs limit the discharge to a monthly dry weather flow of 0.4 million gallons, and require compliance with all applicable provisions of the Tulare Lake Basin Plan. The District will be required to conduct an engineering evaluation of the Facility, and will need to propose upgrades or repairs to meet all applicable regulatory requirements. The proposed WDRs also require the District to prepare and implement a Salinity Management Plan, a Recycled Water Project Study, a nitrogen reduction study, and a groundwater monitoring network installation report.

Because the District is a severely disadvantaged community with a median household income of approximately \$18,650, the proposed WDRs provide the District up to ten years to come into compliance with the EC limit and to develop and implement the necessary upgrades/repairs to the Facility.

ISSUES: Comments were received from the District. Board staff made several revisions to the proposed WDRs in response to these comments. A summary of the issues and responses follow:

1. The District expressed concern related to the increased cost of monitoring requirements. As a result, Board staff made the following changes to the proposed WDRs:
 - a. Increased time for submittal of a Work Plan addendum for a groundwater monitoring well network;
 - b. Increased time for submittal of a Groundwater Monitoring Network Installation Report;
 - c. Reduced Influent TSS and BOD monitoring from weekly to quarterly, and EC and pH from weekly to monthly;
 - d. Reduced Effluent TSS and BOD monitoring from weekly to quarterly, EC and pH from weekly to monthly, and general minerals from biannually to annually; and
 - e. Clarified that groundwater monitoring is to be conducted from monitoring wells that represent first encountered groundwater (to prevent cost of analysis of numerous nested wells, if groundwater levels rebound).
2. The District expressed concern that the proposed WDRs may ultimately require the District to undertake a significant upgrade of the Facility, which would require additional capital costs as well as an operator of a

higher grade. The District contends that this is not economically feasible.

Board staff has attempted to minimize all potential costs associated with the proposed WDRs, and the proposed WDRs provide the District with 10 years to implement any required upgrades, thus allowing the District time to seek funding for the needed improvements. The proposed WDRs also acknowledge that the CV-SALTs initiative may result in changes to applicable regulatory requirements, and include a reopener to revise the WDRs in accordance with any such regulatory changes.

RECOMMENDATION: Staff recommends the Board adopt the Waste Discharge Requirements.

Mgmt. Review _____

Legal Review PEP

18/19 August 2016

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