

Central Marin Sanitation Agency

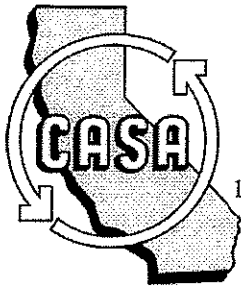
INFORMATIONAL ITEMS

January 11, 2009

- I-1 Letter date 12/11/09 from CASA Re: Request to Remove Biosolids Policy Language from Conservation and Open Space Element
- I-2 Letter dated 12/28/09 to the California Regional Water Quality Control Board Re: Monthly Self-Monitoring Report (SMR)—Month of November 2009

JD - 12/17/09

I-1



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CALIFORNIA ASSOCIATION of SANITATION AGENCIES

December 11, 2009

Chair Sarah Christie and Commissioners
San Luis Obispo County Planning Commission
c/o Ramona Hedges
976 Osos Street, Room 300
San Luis Obispo, CA 93408

Dear Chair Christie and Commissioners:

REQUEST TO REMOVE BIOSOLIDS POLICY LANGUAGE FROM CONSERVATION AND OPEN SPACE ELEMENT

I appreciate the opportunity to provide comments on this issue and do so on behalf of the California Association of Sanitation Agencies (CASA). CASA represents more than ninety percent of the sewered population of California and has long advocated for proactive and sustainable solutions for wastewater treatment, reclaimed water, and biosolids management. I am the Biosolids Program Manager for CASA and a civil and environmental engineer by training. I served on the National Academy of Sciences Committee that evaluated the federal biosolids regulations, releasing a report in 2002.

In the draft Conservation and Open Space Element (COSE) that you are considering on December 17 the following language is included, "The County should prohibit disposal of biosolids on open space lands." Your staff recently proposed this policy change in response to one commenter, but it is important to point out that no scientific evidence was provided to support the commenter's allegations. Scientific research at universities across the nation and around the world has documented for decades the safety and benefits of applying biosolids to land. Biosolids application should not be prohibited, but recognized as an example of an environmentally sound and economically prudent recycling program. Each year 750,000 dry metric tons of biosolids are produced in California and approximately 65% percent is beneficially applied to land. Not only is soil quality enhanced and crop production improved, but carbon is sequestered in the soil and fossil fuel is conserved by not producing as much inorganic fertilizer. San Luis Obispo County cities could also greatly reduce truck trips and fuel consumption by not exporting biosolids to neighboring counties, along with preserving scarce landfill capacity. In general, local application provides net benefits for climate change mitigation and helps to achieve the green house gas emission reduction mandates of the Global Warming Reduction Act of 2006 (AB 32).

Most San Luis Obispo County cities and wastewater agencies already currently truck biosolids out of the County for management. As the population increases, the amount of biosolids generated in San Luis Obispo County will also increase, and CASA is concerned that a prohibition such as the one under consideration would be short-sighted with respect to your county's ability to meet its future environmental and financial needs. Biosolids application within the county would provide a local governance solution with long-term viability. In response to any

Ensuring Clean Water For California

To: Chair Christie and Commissioners

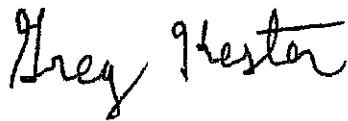
Date: December 11, 2009

Page 2

public health concerns, it should be noted that Biosolids treatment and application is closely regulated by the U.S. Environmental Protection Agency and State Water Resources Control Board.

CASA believes that prohibiting biosolids application on open space lands would not be good environmental policy, and requests you remove this policy language (Policy OS 2.4) from the COSE prior to submittal to the Board of Supervisors. CASA would be pleased to work with you and provide further information if desired.

Sincerely,



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CENTRAL MARIN SANITATION AGENCY

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December 28, 2009

California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Attention: Vince Christian

RE: Monthly Self-Monitoring Report (SMR) - Month of November 2009

Enclosed please find the monthly report for the Central Marin Sanitation Agency (CMSA) treatment plant for November 2009. There were no NPDES Permit violations in November.

Effluent results for Cadmium, Lead and Selenium have been "J-flagged" by Caltest Analytical Laboratory. This means these constituents were detected and the concentrations that were reported are Estimated Concentrations. Note that in the electronic reporting, numerical J-flagged values will be reported and commented as DNQ (Do Not Quantitate). The Final Effluent results for Silver was reported as "ND" by Caltest Analytical Laboratory. This means that silver was not detected at or above the listed Method Detection Limit (MDL). Note that in the electronic reporting, constituents reported as ND will be reported as less than (<) the value listed as the MDL.

The upper control limit for precision was exceeded for our Biosolids Cake Total Solids sample on November 3. This exceedance was due to tight control limits (as a result of good laboratory procedures) for this analysis. The sample was re-analyzed and the result was within the control limits. A Laboratory Corrective Action Plan is on file for this incident.

We had four events in November during which we temporarily stopped flow to our outfall. On November 10 (0950-1700), November 13 (0846-1710), November 19 (1003-1735), and November 30 (1030-1718) our disinfected effluent was diverted to our effluent storage pond in order to perform field strategy testing of our final effluent pump station. The testing included programming of the computerized control system, operation of the gates, flow measurement and final effluent pump operation.

Once the work had been completed on the above mentioned events, the final effluent was pumped back to the chlorine mixing chamber where it was chlorinated a second time before passing into the chlorine contact tanks.

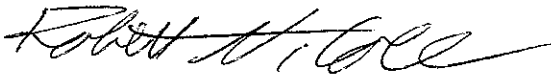


EPA Forms 3320-1 that reflect CMSA's NPDES Permit, Order #R2-2007-007 that went into effect on April 1, 2007 have been completed. As of the October 2004 monitoring period, EPA Forms 3320-1 have been submitted to the State Water Resources Control Board as requested in the letter sent out by USEPA Region 9, Alexis Strauss, dated October 7, 2004. The 3320-1 forms have been sent since the June 2006 reporting period to the new address that was emailed on July 7, 2006 from the DMR Processing Center. We received notification from the DMR processing center in January 2009 that forms will now be emailed in electronic format. The 2009 forms were emailed on February 18 and will be used for reporting for calendar year 2009. There is an error on the 3320-1 forms for Chromium and the only two choices available are Hexavalent and Trivalent Chromium. I have spoken to the DMR Processing center and they are aware of the error. We will continue to manually cross out Trivalent and hand write "Total Chromium" in the box on the forms until the error is corrected and new forms are sent. Total Chromium is specified as a monitoring requirement in our NPDES permit.

CMSA also plans to submit this report electronically.

If there are any questions please contact me at (415) 459-1455, ext. 142. Quality assurance data are available for all test results cited in this report. Values reported are measured values and are each subject to analytical variability. CMSA reserves the right to question data in an enforcement proceeding.

I certify under penalty of law that this document and all attachments are prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who managed the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for known violations (40 CFR 122.22(d)).



Robert N. Cole
Environmental Services Manager

enclosures:

Caltest data
Routine DMR data (map, spreadsheets, forms, graphs)

cc: EPA Forms 3320-1
Division of Water Quality
c/o DMR Processing Center
1001 I Street, 15th Floor
Sacramento, CA 95814

