



Central Marin Sanitation Agency

INFORMATIONAL ITEMS

For the Board of Commissioners Regular Meeting
of July 10, 2018

- I-1** Article from www.waterworld.com dated June, 2018
Re: "EPA to Begin New Rulemaking Process for Blending"

- I-2** Letter dated June 14, 2018 from Michele Mark Levine, Government Finance Officers Association
Re: PAFR Award for FY 2016-2017

- I-3** Letter dated June 14, 2018 from The Honorable Bill Shuster and The Honorable Peter DeFazio, U.S. Congress
Re: Support of NPDES permitting process amendment

- I-4** Letter dated June 27, 2018 to Vince Christian, California Regional Water Quality Control Board, San Francisco Bay Region
Re: Monthly Self-Monitoring Report (SMR) – May 2018

FYI
MK

EPA to Begin New Rulemaking Process for Blending

BY VANESSA M. LEIBY

In a move that took many in the water industry by surprise, the U.S. Environmental Protection Agency (EPA) announced on April 17, 2018, that it plans to begin a new rulemaking process to provide certainty and clarity surrounding the use of "blending" by wastewater treatment plants. The goal is to help facilities optimize wastewater treatment plants during wet weather events. As part of the process, the Agency will be reaching out to states, local communities, and stakeholders.

Blending is typically used by wastewater treatment plants to manage high flow events while still maintaining compliance. According to the EPA press release, "rain and snowmelt can take Publicly Owned Treatment Works (POTWs) offline when excess water enters the wastewater collection system and exceeds the POTW's capacity to treat all incoming wastewater. POTWs often manage excess wet weather flow by routing

June of that year. EPA assembled a group of public health experts to discuss the public health implications of blended effluent discharges from POTWs into waterways. These public health experts were enlisted to ensure that EPA had up-to-date information on the pollutant discharges that may be associated with the different engineering options available to address wet weather blending at POTWs in order to consider the potential public health implications of these different options.

The expert's forum did not include discussion of the application of the Agency's bypass regulation at 40 CFR §122.41(m) going forward (the bypass regulation prohibits the intentional diversion of waste streams from any portion of a treatment facility except where necessary for essential maintenance to assure efficient operation). Rather, the forum was solely concerned with the potential public health impacts of blended discharges from POTWs.

Additional background information regarding the Agency's past actions on blending⁴ as well as its current efforts⁵ can be found on the EPA website. This may have significant impacts on POTWs — make sure you are part of the discussion! **WW**

THE RULEMAKING

aims to help facilities optimize wastewater treatment plants during wet weather events. EPA plans to reach out to stakeholders for input.

some of the incoming water around the secondary (biological) treatment units and then 'blending' it back in with secondary treatment effluent for disinfection prior to discharge." This prevents damage to existing biological or advanced treatment units or other wastewater treatment processes.

The issue of blending is not new to the Agency. In fact, back on December 22, 2005, the Agency published a notice of availability and request for comment in the Federal Register (FR) on National Pollutant Discharge Elimination System (NPDES) Permit Requirements for Peak Wet Weather Discharges from Publicly Owned Treatment Works Treatment Plants Serving Separate Sanitary Sewer Collection Systems.¹ While EPA never finalized the rulemaking for blending, NPDES permit bypass procedures are codified in the 40 CFR §122.41(m).²

Fast-forward to 2014 when EPA published a FR notice on April 18 announcing an Experts Forum on Public Health Impacts of Blending at Publicly Owned Treat Plants³ that was held in

About the Author: Vanessa M. Leiby is the executive director of the Water and Wastewater Equipment Manufacturers Association (WWEMA), a non-profit trade association founded in 1908. WWEMA's vision is to be the "voice of water and wastewater technology providers" and its mission is to promote the advancement of technology solutions for clean water that ensure a future sustainable environment and to improve its members' economic viability. More information about WWEMA can be found at www.wwema.org.

RESOURCES

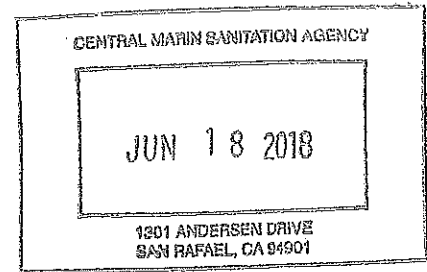
1. Draft policy outlining possible approaches to managing peak weather discharges as published in the FR notice can be found at <https://tinyurl.com/npdes-draft>.
2. Codification of NPDES permit bypass procedures can be found at <https://tinyurl.com/40cfr122>.
3. A copy of the April 18, 2014, FR Notice can be found at <https://tinyurl.com/fr-notice>.
4. Additional background information can be found at <https://tinyurl.com/npdes-experts-forum>.
5. For more information on current efforts, visit <https://tinyurl.com/municipal-wastewater>.

Circle No. 240 on Reader Service Card



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I-2



June 14, 2018

*Great job
Kate & Heidi!*

Jason Dow & Kenneth Spray
General Manager and Administrative Services Manager
Central Marin Sanitation Agency
1301 Anderson Drive
San Rafael, CA 94901

Dear Mr. Dow and Mr. Spray:

A panel of independent reviewers has completed its examination of your Popular Annual Financial Report (PAFR) submitted to Government Finance Officers Association (GFOA). We are pleased to notify you that your PAFR for the fiscal year ended June 30, 2017, has substantially met the requirements of the PAFR Program. In the absence of authoritative standards governing the presentation, these requirements are based on an evaluation of information presented, reader appeal, understandability, distribution, and other elements (such as whether the PAFR is a notable achievement for the government given the government's type and size, and the PAFR's creativity and usefulness). The report received a weighted average score of 75.00 percent or above from three of the four highest individual reviews.

Each entity submitting a report to the PAFR Program is provided with confidential comments and suggestions for possible improvements in the subsequent year's presentation. Your comments and suggestions, as well as a "Summary of Grading" form, are enclosed. We urge you to carefully consider the suggestions offered by our reviewers as you prepare your next PAFR.

Continuing participants will find a Certificate and brass medallion enclosed with these results. The brass medallion may be mounted on your ten-year plaque. First-time recipients will find a Certificate enclosed with these results and will receive a plaque in approximately 10 weeks. The Award commemorates your achievement and may be used for formal presentations.

A current holder of a PAFR Award may include a reproduction of the Certificate in its immediately subsequent PAFR. A camera-ready copy of your Certificate is enclosed for that purpose. If you reproduce your Certificate in your next report, please refer to the enclosed instructions.

Jason Dow & Kenneth Spray
June 14, 2018
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The PAFR Award is valid for one year. To continue your participation in the program, it will be necessary for you to submit your next PAFR to GFOA within six months of the end of your entity's fiscal year. Enclosed is an application to facilitate a timely submission. If submitting electronically, the completed application can be scanned and e-mailed along with a link to the electronic version of the PAFR. If hard copies are submitted, four copies of the completed application should be enclosed with four copies of the PAFR. The appropriate fee may be paid by credit card or check.

We appreciate your participation in this program, and we sincerely hope that your example will encourage others in their efforts to achieve and maintain a well-presented PAFR. If we can be of further assistance, please do not hesitate to contact the PAFR Program staff in the Technical Services Center at (312) 977-9700.

Sincerely,

A handwritten signature in cursive script that reads "Michele Mark Levine".

Michele Mark Levine
Director, Technical Services Center

Enclosures

Congress of the United States
Washington, DC 20515

June 14, 2018

The Honorable Bill Shuster
Chairman, Committee on Transportation &
Infrastructure
2165 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Peter DeFazio
Ranking Member, Committee on
Transportation & Infrastructure
2164 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Shuster and Ranking Member DeFazio,

We write to request that the Transportation and Infrastructure Committee follow-up on its hearing into the need to modernize the National Pollutant Discharge Elimination System (NPDES) permitting process and approve legislation to allow states with delegated authority to administer the NPDES permitting program to issue permits for periods of up to ten years.

This change would allow for enhanced planning and efficient permitting of local wastewater facilities, and is grounded in a commonsense approach articulated in testimony presented on September 26, 2017 before the Subcommittee on Water Resources and Environment.

To accomplish this, we request the Committee consider the following language:

Section 402(b)(1)(B) of the Federal Water Pollution Control Act (as amended) is amended by striking all that follows "terms" and inserting in lieu thereof "not exceeding ten years; and"

This modification would allow a state regulatory agency to consider a permit term beyond the existing five year maximum, but not establish a mandatory term of ten years. We hope that this amendment would allow a state regulatory agency to consider the facts and circumstances of individual permit applications, including construction schedules and past compliance, to determine whether a permit term between five years and ten years is appropriate.

Longer NPDES permit terms for these applicants with a history of compliance would reduce administrative costs associated with shorter permit renewals and allow states to direct more resources to nonpoint and watershed-based solutions.

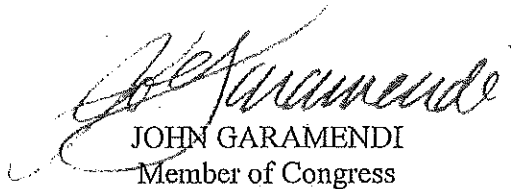
At the same time, standard permit reopener provisions in statute and regulation would allow permits to be reopened and new conditions inserted if necessary prior to permit expiration.

Enclosed is a copy of testimony that the Subcommittee received in September of 2017 that details the need for this amendment. Also enclosed is a detailed response to concerns raised during the hearing over extended permit terms.


Each of these statements clearly identify the need for the proposed amendment as well as the manner in which the public's ability to provide input on a permittee's performance are safeguarded.

We look forward to working with you to address our nation's overall water infrastructure needs in the coming months.

Sincerely,



JOHN GARAMENDI
Member of Congress



ALAN S. LOWENTHAL
Member of Congress

*CC: The Honorable Garrett Graves, Chairman, Subcommittee on Water Resources and Environment
The Honorable Grace P. Napolitano, Ranking Member, Subcommittee on Water Resources and Environment*



CENTRAL MARIN SANITATION AGENCY

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June 27, 2018

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

Attention: Vince Christian

Subject: **Monthly Self-Monitoring Report (SMR) – May 2018**

The May 2018 monthly self-monitoring report for the Central Marin Sanitation Agency (CMSA) treatment plant has been submitted using the eSMR /California Integrated Water Quality System (CIWQS). This SMR conforms to CMSA's NPDES Permit, Order #R2-2018-003.

Violations

There are no reportable NPDES Permit violations for this reporting period.

Blending Events

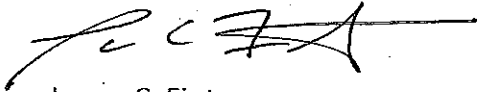
The CMSA treatment facility did not exceed the maximum secondary capacity of 30 MGD. No blend events occurred during this monitoring period.

Data Validation

All regulatory daily, weekly, and monthly quality control calibrations/checks conducted during the month of May met established quality assurance acceptance criteria. During this monitoring period, semiannual, quarterly and permit sampling was conducted for influent, effluent and biosolids sampling locations. Reports for these sampling events have been included for influent and effluent sampling locations. CMSA is currently waiting on analytical results for biosolids which have not been included within this report. Analytical results for biosolids will be provided in next monthly self-monitoring report.

If there are any questions please contact me at (415) 459-1455, extension 101. Quality assurance data are available for all test results cited in this report. Values reported are measured values and each are 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)).



Loren C. Finton
Treatment Plant Manager