
CMSA Newsletter

Central Marin Sanitation Agency

March 2005

GENERAL

Plant Tour for the Regional Water Quality Control Board

On March 21, CMSA conducted a tour of the Lab and Plant for our Regional Board staff: Section Leader Gina Kathuria (who wrote our NPDES permit in 2001 and has been temporarily covering as our Board contact) and Gayleen Perreira who recently became the CMSA Case Handler. Rob Cole explained the Lab facilities and sampling procedures and processes and Al Fiore led the Plant tour. It was a nice opportunity to introduce the facility to Gayleen and a chance for Gina to see that we are still well operated and in compliance. They were both impressed with the operation and cleanliness of the facility and mentioned it is one of the nicer facilities in the Bay Region. To complete the visit our General Manager made a presentation on our Capacity Study including various alternatives to be considered for keeping the plant in compliance in wet weather. The Board appreciated being kept informed. Thanks to all staff efforts we had a good looking plant and a smooth tour (even the rain "cooperated" and held off until Tuesday).

Regulatory Consultant

CMSA is soliciting proposals from consulting firms that

understand the Bay Area regulatory environment, are knowledgeable in the current regulatory trends, and have positive experiences negotiating with the RWQCB. Thus begins our Request for Qualifications to assist CMSA in review of documents; keeping us updated on changes to regulatory issues (including legislative, executive and by legal challenges as well as new regulations) and the possible impacts on CMSA; and in negotiations with the Regional Board (the CMSA NPDES permit is up for renewal in 2006). We envision a regulatory consultant advising us on these issues, advocating for CMSA, sitting at the negotiating table on our behalf and reporting to the CMSA Board as necessary. CMSA will accept submittals through April 6 and after rating the proposals and a consultant presentation, will have a selection recommendation for the Board for the May Meeting.

Outfall Easement

The Dutra Group, owner of the San Rafael Quarry, has requested that we consider allowing them to place temporary buildings (trailers) within our land outfall easement. The specific location is on a vacant parcel adjacent to the San Rafael Public Works building on Morphew Street. The term would be for about 18 months after which they would move into a new office building near the site.

Our Board has approved of the request and draft agreement. We have been working with our legal counsel to put the finishing touches on the Agreement, which will be between the property owner, the San Rafael Land Company, and CMSA. Provisions in the agreement include a processing fee, a monthly encroachment fee, 24-hour emergency vacating requirements, outfall damage clauses, and a penalty for not removing the temporary buildings at the end of the agreement term. We have sent the draft to Dutra and the San Rafael Land Company for review and comment.

MMWD Desalination

The pilot facility at the Marin Rod and Gun Club is under construction. The site fence is up, the job trailer has been delivered and the electrical/telephone line poles have been set. The piping to the pier has been constructed. The pilot plant site construction will continue for the next month or two as tanks, pumps, and pilot equipment are delivered and the piping and electrical connections are made.

The San Rafael Sanitation District has authorized MMWD to continuously discharge the pilot plant wastewater to the collection system. MMWD has agreed to shutdown the plant during wet weather if the collection

system is nearing conveyance capacity.

We have issued a groundwater discharge permit to MMWD for treatment and disposal of the pilot plant wastewater. The wastewater will be analyzed monthly to ensure it meets our sewer use ordinance requirements, and we will invoice MMWD monthly for these analytical costs and the groundwater permit treatment fee.

The Regional Board issued the NPDES permit for the pilot plant at their March Board meeting, which MMWD thought was the major obstacle to overcome. Unfortunately for them, the Department of Fish and Game and NOAA have not approved their respective permits.. MMWD staff has worked with both organization's staff to draft permits the appeared to be acceptable by meeting intake screen, fish entrainment, and other technical requirements. However, when the permits went to the management level for review, they were not approved. This is a set back as it will delay the start-up of the pilot plant.

Strategic Business Plan

Since the adoption of the strategic business plan (SBP) at the December 2004 Board meeting, the Agency executive team has been developing a five-year implementation schedule. The major challenge we faced was how to reasonable

schedule each strategic action while considering the requirements of our regular work activities and the possible conflicting or limited resource needs for simultaneously scheduled actions items.

To facilitate the scheduling process, we agreed to some basic ground rules. First we decided that the first year of the schedule will be relatively firm while the outer years are tentative; Second, we agreed to formally review and modify the schedule annually; Third, the planning committee will meet quarterly to report progress on the year's strategic actions and notify the team if schedules have changed and why. Lastly we went through a process to establish action priorities with their level of difficulty, identified action dependencies, and determined resource needs. With this information the 5-year schedule has been developed and will be shared with the Board at their April meeting.

Records Storage Facility

In late October 2004, we began discussion on cleaning up and organizing the long term storage area located upstairs in the solids handling building. A table of Actions was created and work began on the project.

Debris has been removed, shelves have been ordered and installed, boxes have been designated and labeled for easy accessibility, a phone installed, a copier has been placed in the room, the PA system horn has been relocated of out of the room, electrical rewiring

completed for lighting and power, and a lock was installed on the door for added security.

Each Agency department now has a clearly designated spot for their records (Finance, Administration, Grant Related, Engineering, Lab, and Operations and Maintenance). Once a Records Retention Policy is developed, records will rotate out of the room as new boxes are added. Staff will do a monthly check on the area to make sure it is well maintained and organized.

Security

Ahlborn Fence & Steel is scheduled to start construction of the security fence extension and front gate automation project the week of April 10. The work will be completed by June 10, and will largely complete the second phase of security improvements.

Safety

CMSA's Safety Committee conducted a bi-monthly meeting on March 31, 2005. The safety committee welcomed the new safety committee chair - Devina Douglas. The committee also performed the annual review of the confined space policy, developed the next semi annual safety quiz, reviewed a new annual safety inspection procedure, coordinated the annual pump station safety inspection, discussed an incident report, reviewed the on-going ergonomic program, and discussed the two year cycle of committee members

outlined in the committee bylaws. The *Injury Illness Prevention Plan* was distributed to members for review, and comment at the next scheduled committee meeting.

CAPITAL/ ENGINEERING

Capacity Management Study

Carollo engineers is nearing completion of the study work. The treatment plant hydraulic and process evaluations have been completed as has the prediction of wet weather flows for various design flow events. The results indicate that the wet weather process capacity is 90 MGD and the hydraulic capacity is 95 MGD at high tide with flow backed up to the secondary clarifier RAS box elevation. Design flows and volumes for 2, 5, 10, and 25 year events have been calculated for 110MGD, 125 MGD, and 155 MGD collection system transport limits. At 110 MGD, a flow we have measured, the extra volume of wastewater we would need to manage for a 5-year event is about 30 million gallons. Bigger events and higher collection system limits results in more water to manage.

We have hired Dodson engineers to Peer Review the study findings to either validate them or identify areas potentially needing some additional study or clarification before we continue with our

planning. Jeff Lewandowski, a civil engineer with a PhD in hydraulics/hydrology, has conducted the review. He agrees with the process and hydraulic findings and with the volumes calculated for the design events. He understands how Carollo calibrated their design event model, but would use a more conservative approach. We are currently discussing the approach differences with Carollo and Dodson.

Our project team has met with Carollo to brainstorm collection system and treatment plant solutions, and have reviewed the subsequent fatal flaw and feasibility screening analyses performed by Carollo. The alternative solutions that passed through both analyses have been used to develop combinations of solutions to manage flows for the different design event and collection system combination. In all, there are 65 solution combination. Solutions include storage only, I/I reduction and storage, I/I reduction and WWTP improvements, and lastly storage, I/I reduction, and WWTP improvements.

Storage is the most expensive alternative and has the highest unit cost for each gallon of water handled. I/I reduction was limited to 10% in the future. The most economical solution is to expand the plant while the member agencies attempt to reduce I/I. Expansion alternative include effluent pumping, new clarifiers and contact tanks, and secondary

process improvements. The cost to bring capacity to the 110 MGD level is about \$21 million. Since this involves adding tanks of similar size to existing, the expansion is capable of processing flows for the 2,5, and 10 year events.

A couple of near future next steps will to meet with the member agency managers to present the findings to date, and to discuss the conceptual solutions and costs with the Board at the April meeting. Carollo will make the final presentation at either the May or June Board meeting.

Outfall Corrosion Survey and Paving Repair

Conceco/Matcor is wrapping up its close-interval corrosion survey of the land portion of CMSA's 84-inch outfall pipeline. As the name implies, this involved taking shallow-depth electrical potential measurements every ten feet along the land pipeline. Where streets or other paved areas overlay the pipeline, shallow holes were drilled into the pavement to allow good readings. There was some unforeseen chipping of the paved surface surrounding the holes, and Ken Katen has worked closely with the City and Conceco/Matcor to get them repaired to the City's satisfaction. The repairs will be complete by April 8, with the corrosion survey report to follow.

Dewatering Phase IV (Polymer)

The Board of Commissioners approved engaging Kenney/Jenks Consultants to assist us with the improvement project for our polymer storage and handling facility and vector unloading station. Using the same consultant for both projects will produce efficiencies and associated savings in both consultant services and in CMSA's project management. We met with Kennedy/Jenks on March 18 to tour our existing facilities and to scope the improvement projects. Kennedy/Jenks' first milestone for the polymer handling facility is conceptual development and evaluation of design alternatives, due to us by June. Once we've evaluated them and selected the best approach, the design process will move forward. We expect this to be about a 16-month project, with the construction phase's beginning dovetailing with our new liquid polymer supply contract next fall, and construction being complete next summer.

Vector Station Improvement

As noted above, Kennedy/Jenks Consultants is assisting us with the vector station improvement project. We expect to have their proposal for the improvements by April 5. We anticipate this being about a 16-month project, with construction being complete by summer 2006. As described above, using a

single consultant for both the polymer facility and vector station improvement projects will produce efficiencies and savings in both consultant costs and CMSA project management tasks.

Cogeneration

Now that the Cogeneration project is winding down, Tom Rose has handed off the project management responsibilities to a CMSA Cogen Team, including the General Manager, the Project Engineer, the Treatment Plant Manager, and the Process Control Coordinator, with other staff rotating in as needed. It's a telling point that it will take a team to replace Tom's guiding hand, and we thank him for all his good work to date.

Our first priority is to get the engine running on natural gas for full-scale load and operational testing. Toward that end, we have identified "startup critical" items on the construction punch list and will have them completed by the time the training and remaining control issues have been completed. We are putting all remaining punch list items on short-interval schedules, which means we will stay in close contact with the appropriate parties until they are completed. In some cases, we may use CMSA resources to complete tasks that are supposed to be a vendor's or contractor's responsibility, usually due to inadequate responsiveness on their parts. We will revisit the cost structure associated with any items CMSA completes as

part of the contract closeouts.

Training will be completed on Thursday, April 7, and this will allow us to move forward with natural gas operation without being dependant on third parties' availability. We also expect to have the remaining control/alarm issues sorted out by Friday, April 8. We hope to start natural gas operation soon after that.

Regarding biogas operations, we have issued a change order directive to McKenna Engineering, our gas compressor vendor, to order the equipment needed to address the problems with the compressor set. As noted in earlier updates, the retrofit involves both replacing regulators and increasing the compressor bypass capacity to 100% for engine startup. We should note that, although McKenna took longer than we expected to initiate the equipment order, they used the time to redesign the solution, producing over \$10,000 savings per compressor.

SR Hamilton, the general contractor, and Mike Brown Electric, the electrical subcontractor, submitted an approximately \$158,800 claim notice. We have rejected the notice, based on lack of supporting evidence and untimeliness of the request – most of the work was done in August 2004 and the contract clearly states 30 – and 60 – day claim notice requirements. We wish to compliment CMSA's operations and maintenance

staff who are both providing very useful monitoring of actual construction conditions and promptly – and agreeably - performing the critical tasks we need to do ourselves to get the engine running.

BUSINESS SERVICES

Budget Planning:

The fiscal year 2005/2006 budget development continues to move ahead. In early March, the first draft of the Agency's 5-year Capital Improvement Plan was completed and we are now focusing on the operating budget. Prior to fiscal year 2004/2005, the Agency had an enterprise wide operating budget. In FY05, the Agency produced its first operating budget broken down by department. The purpose of breaking down the operating budget by department is to have a better understanding of our expenditures which enables us to better forecast expenses and therefore develop more accurate budgets. The 1st draft Environmental Services budget has been completed and we are in the process of developing the Business & Administrative Services, Operations and Maintenance departmental budgets. Key budget development project plan milestones and target completion dates are as follows: 1) 1st detail draft budget developed and drafted - 4/21/05, 2) internal publication and review of draft budget - 4/28/05, 3) draft budget presented to CMSA Board -

5/9/05, 4) final budget presented to CMSA Board - 6/14/05.

Hydrogen Peroxide Contract

CMSA has a hydrogen peroxide supply contract with UNIVAR USA, which will expire April 28, 2005. The contract has a provision that allows the contract to be extended for an additional year if agreed to by both parties. UNIVAR USA was not agreeable to an extension.

New hydrogen peroxide bid packages were prepared and mailed to five potential hydrogen peroxide suppliers on March 14 and advertised in the Marin Independent Journal the week of March 18. A pre bid tour was conducted on March 30, with two attendees, and the bid opening is scheduled for April 5, 2005.

Polymer Contract

To improve the efficiency of our dewatering equipment, CMSA has initiated an emulsion polymer project that will replace our current mannich polymer system with an emulsion system. Prior bench testing of emulsion polymers has demonstrated improvements in our cake solids of 2 to 5%. This is significant because CMSA could process the same volume of digested sludge but with shorter equipment run times and a reduction in the number of loads off hauled.

Taking a proactive approach, we are developing the contract language and provisions for an emulsion polymer contract before the project schedule is completed. The goal is to have a bid package ready to go on a

short notice to ensure the delivery of product coincides with the need for it.

Asset Management

CMSA's Computerized Maintenance Management System (CMMS) component of the developing Asset Management program continues to progress on schedule. Currently two phases have been developed to implement the CMMS module. *Phase One* has three milestones that address; 1) Corrective Maintenance Rollout, 2) Asset Management - Tracking Procedures and Documentation, 3) Asset Tree & Operations Preventative Maintenance data-base population. Milestones one and two have been completed and implemented. The data collection task of milestone three is 96% complete and the data entry function is 43% completed.

Phase Two has six milestones defined into specific areas within the plant, and at pump stations. The general task descriptions are the collecting, collating & defining of tasks, population of the preventive maintenance (PM) databases, implementation of the PM schedule, and collection and population into the new CMMS, the historically relevant data from the obsolete MP2 and Paradox software databases. With the completion of *Phase Two* milestones and tasks, target completion date is the next data point to be inserted into the plan. Initial estimates

put the number of PM's requiring conversion at approximately 1570.

CMSA's current Asset Management Program (AMP) has focused primarily on the implementation of the Computerized Maintenance Management System (CMMS) component. This focus was deliberate and appropriate due to the inherent importance of a CMMS within an AMP. The CMMS is the backbone that supports and ties the other components of an AMP together. With the implementation of the CMMS progressing as scheduled, and being a tangible component of the AMP, it is time for CMSA to start developing the other conceptual components. To do this we must create a comprehensive plan that provides a road map for achieving these goals. All components of the AMP will be prioritized, and scheduled for implementation over multiple years. To facilitate the development of a high quality plan, we have requested a proposal from Brown & Caldwell to provide their technical and practical expertise in the field of asset management during the development of our AMP.

OPERATIONS & MAINTENANCE

Roof Beam Repair

Staff had a follow-up meeting with the structural engineer, the restoration contractor, and the inventor of the in-place

epoxy repair technology, to reinspect the Administration roof beams and develop a conceptual solution. The follow-up meeting was prompted by the discovery of more extensive damage to the front entry roof beam than was originally estimated. The consensus was that the two main beam-ends can be repaired in place using the in-place epoxy technique, and that the front entry beam needs more detailed investigation. The next step will be removing as much rotted wood as possible from all three beam-ends to facilitate drying, followed by inspection and load calculations by a structural engineer for the front entry beam. Depending on the extent of remaining sound wood, that beam could be repaired or, if the rot is too extensive, it might need replacement. We expect to have a repair estimate in time for inclusion in the FY 2006 budget and, if all goes well, we expect to have the repairs completed by late summer.

Proposed Biosolids Legislation

Senator Florez has introduced a bill in the State Senate, SB 926, that if passed, will prohibit the exporting of biosolids out of the county in which they are generated. This bill has the potential to significantly impact many cities and sanitary organizations that exclusively rely on out of county biosolids management practices because there isn't any available space within their counties. Examples include San Francisco, Los Angeles County Sanitation, and East Bay MUD. Currently, 15%

of biosolids have to be trucked out of state for disposal due to the lack of land application sites.

CMSA would be impacted since we land apply about 40% of our biosolids in southern Sonoma County. Our only option we be disposal at the Redwood Landfill as Marin County does not have land application sites. We would lose our diversification and our disposal costs would increase. Additionally, Sonoma county farmers would lose revenue and an excellent fertilizer for their crops.

CASA has taken an "Oppose" position on the bill and is lobbying members of the Senate Environmental Quality Committee to oppose the bill also. CASA has requested its membership to send letters to the committee members stating how the bill could detrimentally impact their organizations. We sent a letter to the Senate Committee members early this week.

Final Effluent Sampler

After much planning, preparation, investment and construction, O&M moved our Effluent sampler to the Final Effluent De-Chlor Vault this month. The chart recorder and sampler were moved, alarming is enabled and the points are being recorded in the process database. Testing showed that we needed to change the sampler 3W supply form the Plant to the Carrier water system to stop

spiking of the end analyzers by the 3W system residual (from hypo pump 217). This change has smoothed out the strip chart reading Cl2 residual on the effluent strip chart. Final steps will be to refine the HMI graphic and then Maintenance will remove the old code and alarms.

An original driver for this move is to conduct continuous monitoring of our effluent in the dechlorination mode and use this to feedback loop to fine tune our SBS dosing requirement. Having a tighter control of our SBS would reduce SBS use, giving us a cost savings. Also the State is looking into requiring continuous residual monitoring and reporting. To impose this requirement, the Board is looking into allowing discharge of very low positive residuals for some minutes without triggering a violation. The State is considering this grace period as an incentive to encourage permittees to switch to continuous residual monitoring of their final effluent.

O&M PERSONNEL

Here comes the first Saturday in April and another SWRCB Wastewater Operation Certification test. Virgil Sevilla will be taking the Grade IV exam, Sandi Batis will be taking the Grade II exam, and even a Grade V doesn't mean you are done, Nathan Brennan is being called in to assist in proctoring at the Chabot exam site.

Our recent OIT hire, Richard Jackson, was denied state

certification (even an OIT) so fails to meet the minimum qualifications of the position and his final day at CMSA was Friday March 25. Richard is still interested in the wastewater field and will be studying for the October 2005 certification test.

O&M personnel attended a variety of training classes: for our new cogen Waukesha unit, for trench safety, for certified forklift operation trainers, and for our annual Lock Out Tag Out.

O&M MONTHLY

March has been a wet month with recent storm flows reaching 80 MGD. Although our wet weather events resulted in blending for numerous days, Operations was able to keep the plant in permit compliant operation.

Cogen engine testing this month included the generator's load following control. It worked fine but was slow to respond. After turning a blower off (an immediate 100KW drop in load) the generator took over one minute to get back to the power margin setpoint. This would mean that the draw from PG&E would have to be set at a minimum of 100KW power margin. The other major test was of the heat recovery system. It did not work fast enough and the engine shut down on over temp. The engineer was given a report and is following up on these issues.

The newly installed power distribution panel in the Administration Building was used to supply power to the copy machine after it was moved. In parallel with this project UPS

power from the control room UPS was connected to the plant annunciator panel and to the PLC cabinet upstairs in the control room to improve reliability.

The Variable Frequency Drive for #4 RAS pump failed and a new VFD was purchased and installed. The new drive has been tested and the control circuits are being designed by I/E to interface the new equipment to the manual control panel and the process control system.

Fleet Week

In preparation for our FY06 budget and following up on input from the Executive Team, the O&M departments have analyzed our vehicle fleet. The vehicle fleet has expanded recently since CMSA did not sell a vehicle as we were acquiring two. After reviewing agency needs, we recommend disposing of two vehicles in the next three months. This will result in savings of maintenance and insurance costs.

A bicycle accident made us very aware of the deteriorating condition of our bike fleet. O&M investigated our bikes' condition, repair costs and maintenance options. Since it would be difficult and expensive to recondition all the existing bikes, CMSA is purchasing four new bikes with a 5-year annual service check. The unrepairable bikes will be donated to the non-profit Trips for Kids (that operates the

Recyclery store and training workshop in San Rafael).

We look forward to starting the new fiscal year with a safer more reliable vehicle and bike fleet.

ENVIRONMENTAL SERVICES

NPDES Testing

The NPDES testing we performed for March was in compliance with our permit requirements. Our March testing included Section 13267 of the California Water Code that requires CMSA to perform semi-annual sampling of all 126 priority pollutants and some additional sampling specific to sewage treatment plant effluent dischargers. Most of the results have been received and the few compounds that were detected were at a level that will be reportable by not quantifiable, because they were found at levels close to the estimated ability of the equipment to detect the compounds.

Influent flows have been elevated due to the consistently rainy weather, which has resulted in higher solids that both interfere with the low level testing methods as well as higher sample results.

Laboratory

We received the results from our laboratory certification

testing for solids analysis and we passed. Our values were extremely close to the true values, almost exact, which demonstrates the high quality of data that our laboratory produces.

Our laboratory is currently scheduled for our biannual ELAP inspection on April 29th. We completed our comprehensive application that covers all of our equipment, the testing methods we perform, and the quality control measures we utilize to ensure our data is verifiable. They will review the completed application prior to the inspection and discuss areas where the regulations may have changed recently or requirements and suggestions for improvements. Our quality control manual has been updated with any recent changes and also submitted to ELAP. We are currently reviewing all of the standard operating procedures, quality control, chemicals, reagents, glassware, and monitoring and maintenance of equipment to ensure everything is ready for the inspection.

Bioassay Test

We had 95% survival of the fish in our March bioassay. Every month we are required to perform a 96 hour bioassay that runs continuously from Monday to Friday. The purpose of this test is to assess the effects of our effluent on the survival of young rainbow trout. Our permit requires that we have an 11 sample median limit of 90 percent or greater and a 90th

percent survival of at least 70 percent. This means no two samples over an 11 month period can fall below 70 percent survival to meet this limit.

SSO Testing

We have continued to run samples for our member agencies to assist them in determining the possible impacts of Sanitary Sewer Overflows (SSOs). The State Water Resources Control Board will soon be drafting the requirements for Sanitary Sewer Management Plans. They have discussed workshops to study what laboratory testing will be required when there is an overflow, and we will participate in the discussions when these requirements are being drafted. Currently the suggested guidelines are to collect samples as close to the source of the overflow as possible, and both upstream and downstream of any body of water that might be impacted by the overflow. The recommended testing is for ammonia and possibly testing for bacteria or detergent but the latter testing is more complicated or has increased sources of contamination.

Zero Discharge Inspections

We have begun our zero discharge inspections for automotive facilities. These are inspections of automotive facilities that are not allowed to discharge any process waste or car washing water to the sanitary sewer because

they do not have the required pretreatment equipment at their facilities. There are a total of 23 outside of San Rafael and about 140 in San Rafael. We will be inspecting facilities to ensure they are still zero discharge. Those with floor drains we will checked to ensure their drains are capped with a crimped CMSA seal. If there is not a plug in place, we will plug it and reinspect in the future to ensure the plug is not being removed. If we discover they are removing the installed plug, we will take further enforcement action that may include a permanent solution such as elimination of the floor drains.

Public Education Program

We are gearing up for the Marin County Fair, which is our largest public outreach effort. In the past we have had over 2,000 people take our environmental education quiz. We are required by the Regional Board to have a public outreach effort as part of our pollution prevention program and we jointly work with LGVSD to share resources and make the program a success.

Promotional items have been ordered with our new logo. We will be "Taking a Bite Out of Pollution" with a new friendly shark logo. The promotional items include T-shirts, shopping bags, magnets, pens, stuffed shark, and water bottles, and help entice both children and

adults to take our educational quiz.

We have also ordered a book called "Flush" that is designed to educate children about how a wastewater treatment plant works and how we help protect the environment. It has taken many years to find such a useful and applicable book to help school age children understand what we do and the benefits of our hard work. We organized many of the Bay Area Wastewater Treatment Plants to participate in the ordering of this book to have a special printing in paperback form to greatly reduced the costs.

Stormwater Agreements

CMSA has agreements with the City of San Rafael and the Town of San Anselmo to enforce stormwater management and discharge programs. We have recently updated the contracts to include the new project director, Robert Cole (formerly Tom Rose), and to confirm that the Agreement automatically renews annually unless terminated by either party. We already enforce provisions of the Health and Safety Code relative to sewer discharges and the stormwater agreement coordinates enforcement efforts between stormwater pollution prevention and illicit sewer discharges. It both benefits the City or Town and CMSA by reducing pollution and complying with requirements of the Federal Clean Water Act.

Letters were sent to the Town of Corte Madera and the City of Larkspur in December offering our services to enforce their storm water ordinances. Corte Madera has not responded, and Larkspur is planning to bring the request to their City council for consideration in the near future.

LGVSD Assistance

We have been providing assistance to LGVSD in setting up a Fats Oil and Grease (FOG) program in their service area, which is a requirement of the new Sewer System Management Plan (SSMP) that will be required of every collection system owner.

We are assisting LGVSD to recover expenses for a sewer line blockage that required district staff to remove congealed grease. The blockage occurred downstream from McInnis Park Golf Center Restaurant and the restrooms at McInnis Park. Al Petrie, LGVSD General Manager, and our staff collaborated on preparing a letter requesting reimbursement and additional grease pollution prevention efforts. The letter is requiring the restaurant to pay the districts expenses for removing the blockage and have their grease trap pumped and disposed of legally at a frequency to prevent further blockages.