

CITY OF SANTA ROSA  
BOARD OF PUBLIC UTILITIES

TO: BOARD OF PUBLIC UTILITIES

FROM: HEATHER JOHNSON, ENVIRONMENTAL SERVICES OFFICER  
WATER DEPARTMENT

SUBJECT: SANTA ROSA REGIONAL WATER REUSE SYSTEM NATIONAL  
POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)  
PERMIT RENEWAL

AGENDA ACTION: MOTION

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RECOMMENDATION

It is recommended by the Water Department that the Board of Public Utilities (BPU), by motion, approve the proposed Santa Rosa Regional Water Reuse System (Reuse System) Report of Waste Discharge, application for renewal of the Reuse System's National Pollutant Discharge Elimination System (NPDES) Permit.

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EXECUTIVE SUMMARY

The City of Santa Rosa is required to file a Report of Waste Discharge (ROWD) as application for the issuance of a new waste discharge permit for the Santa Rosa Regional Water Reuse System, Laguna Treatment Plant in accordance with Title 23, California Code of Regulations, no later than August 3, 2018. Staff recommends approval from the BPU of the proposed application.

BACKGROUND

The City of Santa Rosa Regional Water Reuse System, Laguna Treatment Plant (Reuse System) was issued Order No. R1-2013-0001 (NPDES No. CA0022764) on November 21, 2013, effective February 1, 2014 and expiring on January 31, 2019. This Order serves as the NPDES permit for the Reuse System discharge requirements to the Laguna de Santa Rosa, and as the Master reclamation permit for Santa Rosa's Recycled Water Program.

PRIOR BOARD OF PUBLIC UTILITIES REVIEW

On January 18, 2018, the Board received a staff briefing which provided an overview of

permit renewal planning for the Reuse System NPDES permit including permit conditions under evaluation and pending development of an alternative compliance option for the No Net Loading of Phosphorus permit limitation.

On May 3, 2018 Board conducted a study session to discuss the Phosphorus Blue-Ribbon Panel process including potential alternative compliance approaches to the No Net Loading of Phosphorus requirement in the Reuse System's NPDES permit.

On June 21, 2018, the Board conducted a study session to provide feedback on the permit renewal process and proposed permit modifications and to receive an update on the Blue-Ribbon Panel meetings and proposed alternative compliance approach.

## ANALYSIS

The City of Santa Rosa will be submitting the ROWD for the reissuance of the Reuse System NPDES permit. The ROWD package contains all required California and U.S. EPA forms which describe the City of Santa Rosa Regional Water Reuse System in addition to supplemental information. Supplemental Information of note is as follows:

Recycled Water Program – the City will be requesting recycled water program approval under the Statewide General Order for Recycled Water Use. As a result, the requirements for recycled water distribution and use would be removed from the NPDES permit and implemented under the Statewide General Order. Requirements for recycled water production are anticipated to remain within the Reuse System NPDES Permit.

Phosphorus Blue Ribbon Panel Recommendations – The Phosphorus Blue Ribbon Panel was convened to explore alternate regulatory approaches that would provide reliable ongoing water quality benefits to the Laguna de Santa Rosa watershed while concurrently providing NPDES permit compliance certainty for the Reuse System. The Panel came up with a set of guidelines to guide discussion of the way phosphorus is regulated. Most significantly, a joint proposal was created by The Russian River Keeper, The Laguna de Santa Rosa Foundation, and the City of Santa Rosa that would allow the City to provide funding towards large scale, long term restoration projects as part of an alternative compliance approach that would provide regulatory certainty in contrast to the current “no net loading” limit for phosphorus which relies on estimating seasonal discharges and phosphorus offset credit needs. The joint proposal was supported by the Blue Ribbon Panel and will be presented to the Regional Board during the NPDES permit renewal process.

Monitoring Program Provisions and Frequency – The Reuse System's NPDES permit contains a robust Monitoring and Reporting Program (MRP). Based on the high quality of recycled water (effluent) produced at the Laguna Treatment Plant and results consistently below water quality objectives, the City is requesting reduced recycled water (effluent) monitoring requirements in the new NPDES permit. For the most part, these changes recommend less frequent monitoring where data trends analyses deem

appropriate.

### FISCAL IMPACT

Not Applicable. Fiscal implications cannot be estimated until the new Reuse System NPDES Permit is adopted.

### ENVIRONMENTAL IMPACT

This action is exempt from the California Environmental Quality Act (CEQA) because it is not a project which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, pursuant to CEQA Guideline section 15378.

### BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

Not Applicable

### ATTACHMENTS

- Attachment 1 - Report of Waste Discharge (ROWD) for reissuance of Santa Rosa Regional Water Reuse System NPDES Permit No. CA0022764.

### CONTACT

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