

CITY OF SANTA ROSA
BOARD OF PUBLIC UTILITIES

TO: BOARD OF PUBLIC UTILITIES
FROM: PATRICK PULIS, ENVIRONMENTAL COMPLIANCE INSPECTOR,
WATER DEPARTMENT
SUBJECT: APPROVAL OF UPDATES TO THE WATER DEPARTMENT'S
ENFORCEMENT RESPONSE PLAN AND THE SIGNIFICANT
INDUSTRIAL USER ENFORCEMENT RESPONSE POLICY

AGENDA ACTION: MOTION

RECOMMENDATION

It is recommended by the Water Department that the Board of Public Utilities, by motion, approve updates to the Water Department's Enforcement Response Plan and the Significant Industrial User Enforcement Response Policy.

EXECUTIVE SUMMARY

Approval of the updates to the Water Department's Enforcement Response Plan and the Significant Industrial User Enforcement Response Policy will meet the required revisions noted in the United States Environmental Protection Agency's Pretreatment Program 2019 audit findings. Proposed updates to the Enforcement Response Plan will also reflect structural changes that have occurred in the Water Department since it was last updated in 2010.

BACKGROUND

Compliance with the United States Environmental Protection Agency' (USEPA) Pretreatment Program for Significant Industrial Users and Categorical Users is monitored by the Water Department's Environmental Compliance Section (ECS). The Water Department has an Enforcement Response Plan (ERP) that outlines operational procedures and enforcement mechanisms intended to ensure all discharges to the sanitary sewer system are in compliance with Santa Rosa City Code, Title 15 - Sewers and USEPA Pretreatment Regulations (see Title 40 Code of Federal Regulations Part 403). The ERP was initially adopted in 1993 and the current ERP was adopted in 2010 along with the Significant Industrial User Enforcement Response Policy (SIU Policy).

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PRIOR BOARD OF PUBLIC UTILITIES REVIEW

On January 21, 2010, the Board of Public Utilities (BPU) approved updates to the ERP and adopted the SIU Policy.

ANALYSIS

In November 2019, the USEPA audited the Water Department's Pretreatment Program (2019 Audit) and found that the SIU Policy needed to be updated to reflect the 2019 BPU adoption of Local Limits changes that had been made to Santa Rosa City Code Title 15-Sewers, specifically the pH limit. The 2019 Audit also found the language in the SIU Policy that addresses evaluation of whether an SIU is in significant non-compliance is not consistent with the relevant Federal Regulations (40 C.F.R. Part 403).

To satisfy the findings made in the 2019 Audit, the SIU Policy has been updated. Staff has also updated the ERP to accurately reflect structural changes within the Water Department since the ERP was last updated. Most of these changes involve department name and job titles.

FISCAL IMPACT

None.

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 Guidelines Section 15378.

BOARD/COMMISSION/COMMITTEE REVIEW AND RECOMMENDATIONS

None.

ATTACHMENTS

- Attachment 1 – Redline Enforcement Response Plan
- Attachment 2 – Proposed Enforcement Response Plan
- Attachment 3 – Redline Significant Industrial User Policy
- Attachment 4 - Proposed Significant Industrial User Policy

CONTACT

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