

# 2024 Regional Water Reuse System Compliance Update

May 15, 2025

**Board of Public Utilities Meeting**

Presented by Heather Johnson  
Environmental Services Officer

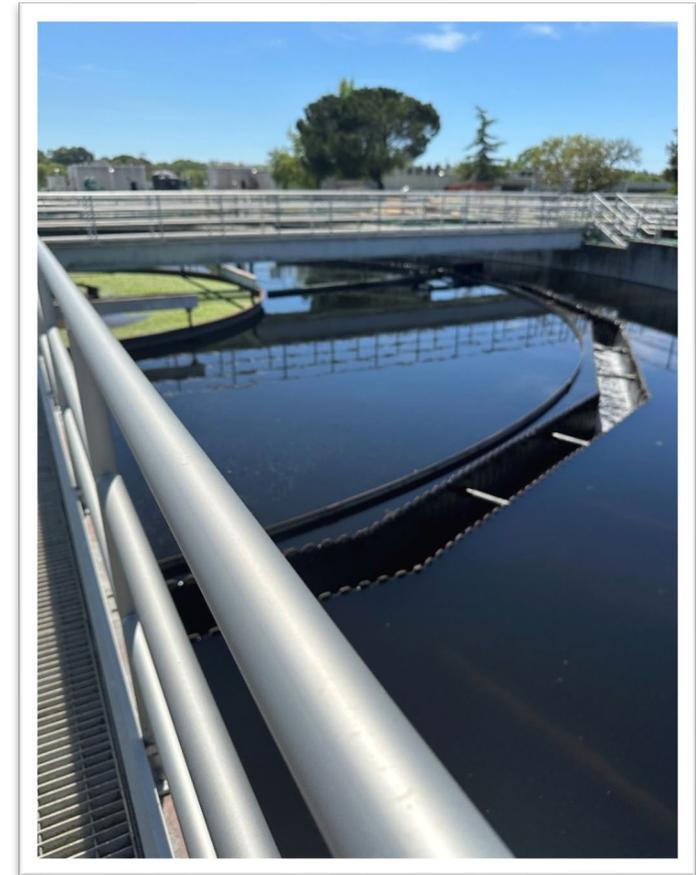


# Overview

- Applicable Rules, Regulations, Permit Requirements and any Non-Compliance Events:
  - Wastewater Treatment
  - Biosolids
  - Recycled Water
  - Air Quality and Emissions
- Discharge Season Phosphorus Compliance
- UV System Compliance Schedule
- LTP NPDES Permit Renewal

# Wastewater Treatment, Recycled Water, and Biosolids

- NPDES Discharge Permit
- Recycled Water – Notice of Applicability
- Biosolids – Notice of Applicability



# Wastewater Treatment & Monitoring

Non-compliant Events	Description	Cause
<b>Monitoring</b>	Missed monitoring for Total Coliform.	Analytical error in the Laboratory
<b>Treatment System Bypass</b>	1.03 million gallons of wastewater bypassed a portion of the treatment system	Operator error
<b>10 Periods of under disinfection:</b> UV Dosage <100 mJ/cm <sup>2</sup> UVT Below 50%	Duration from 3 seconds to 57 hrs. 19 minutes Total Duration ~70 hours	High turbidity, process control equipment failure, power loss, UV channel repair work, flow surge after shutdown, high flows caused by rainfall
<b>Total Coliform</b> 7-day median exceedance – total of 13 days	7-day median exceedance (greater than 2.2 MPN/100mL) and exceeded 23 MPN/100mL more than once in a 30-day period	Exact reasons are unknown, theoretically possible that algae caused particle shielding in the UV channels

# Recycled Water & Discharge

Non-compliant Events	Description	Cause
<b>Recycled Water leaks &amp; spill</b>	Total of 8 events in 2024 ranging from <50 gallons to 16,000 gallons	Line breaks, damaged equipment, broken sprinklers, overwatering
<b>Discharge to Santa Rosa Creek co-mingled with off-spec water</b>	Discharge in December 2024 included a nominal amount of off-spec water	Check valve failed causing water from a pond storing off-spec water to enter the distribution system and 1.7 million gallons reached Delta Pond

# Title V Air Quality Permit and Permit to Operate

- Federal Clean Air Act Title V Air Permit for Major Sources
- Permit to Operate



# Air Quality and Emissions Compliance Summary

Non-compliant Events	Description	Cause
<b>Exceeded permitted natural gas usage on Engines 1 &amp; 2</b>	Engines 1 & 2 are subject to natural gas usage limitations of 15.55 MMscf/year	Due to failed oxidation catalysts on Engines 3 & 4 the City was unable to operate the Combined Heat and Power as intended, causing excess natural gas usage on Engines 1 & 2
<b>Low use boiler exemption</b>	City exceeded the low use boiler threshold	Operational error when equipment was placed from “auto” to “hand” causing excessive boiler usage
<b>Settlement of past Notice of Violation</b>	The Air District provided a civil penalty settlement offer of \$25,000 for permit exceedances that occurred in 2023	High Strength Waste throughput limit of 46,000 gallons per day was exceeded 4 times in early 2023

# 24/25 Discharge Season Phosphorus Compliance

## SUMMARY OF DISCHARGE SEASON 2024-2025

Phosphorus Credits Available At Start of Discharge Season	2023-2024 Phosphorus Credits Generated				Credits Retired	Credits Used	Total Credits Available
	Beretta	Pepperwood	Laguna 1 & 2	Purchased			
17,286	412*	337.5*	92*	0	0	5,555*	12,572*

\*Credits are estimated until all projects have been validated, and credits have been entered into the City's tracking database

# Laguna Treatment Plant UV System Compliance Schedule

- Submitted a Request for Extension in September 2024
  - One-year extension requested for UV system Compliance Schedule
  - Permit was reopened and an Amendment Order went out for public comment
  - On December 5, 2024, the North Coast Regional Water Quality Control Board adopted the Amendment Order with the proposed compliance schedule dates

Task	Proposed Action	Compliance Date
1	Submit Progress reports to the Regional Water Board Executive Officer.	March 1, Annually
2	Complete construction of on-site diversion system and UV disinfection system upgrade project.	December 31, <u>2025</u>
3	Achieve full compliance with UV system operational requirements and effluent limitations. <sup>1</sup>	September 30, <u>2026</u>

# Laguna Treatment Plant NPDES Permit Renewal

- **Report of Waste Discharge (ROWD) submitted to Regional Board in September 2024**
  - Application forms, site layout maps, updated schematics
  - Reasonable Potential Analysis data set
  - Submittal of required Discharge Model Validation Reports
  - Updated Trucked Waste Management Plan
  - Discharge Management Plan
  - Radioactivity and Acute Toxicity Monitoring Reports

**Questions?**

**Thank you.**