



METRO TAC AGENDA
(Technical Advisory Committee to Metro JPA)

TO: Metro TAC Representatives and Metro Commissioners

DATE: Wednesday, June 15, 2011

TIME: 12:00 p.m. to 1:30 p.m.

LOCATION: MWWD, 9192 Topaz Way, (MOC II Auditorium) – Lunch will be provided

****PLEASE DISTRIBUTE THIS NOTICE TO METRO COMMISSIONERS AND METRO TAC REPRESENTATIVES****

1. Review and Approve MetroTAC Action Minutes for the Meeting of [May 18, 2011](#) (**Attachment**)
2. Metro Commission/JPA Board Meeting Recap (Standing Item)
3. Financial Update (Karyn Keese)
 - A. 2011 Year-End Projections (Edgar Patino)
 - B. 2012 Metro Operating and CIP (Edgar Patino)
4. Fourth Amendment to Metro JPA Treasurer's Services Agreement with Padre Dam Muni Water District (**Attachment**)
5. Metro Wastewater Update
6. MetroTAC Work Plan (Standing Item) (**Attachment**)
7. Point Loma Wastewater Treatment Plant, Future NPDES Permitting Strategies (**Attachment**)
8. Municipal Transportation Agreements (Standing Item) (Edgar Patino)
9. Review of Items to be Brought Forward to the Metro Commission/Metro JPA Meeting of [July 7, 2011](#)
10. Other Business of Metro TAC
11. Adjournment ([To the next Regular Meeting, July 20, 2011](#))

Metro TAC 2011 Meeting Schedule

January 19	May 18	September 21
February 16	June 15	October 19
March 16	July 20	November 16
April 20	August 17	December 21

AGENDA ITEM 1

Attachment

Metro TAC
(Technical Advisory Committee to Metro JPA)

ACTION MINUTES

DATE OF MEETING: May 18, 2011
TIME: 11 AM
LOCATION: MWWD, MOC II, Conference Room

MEETING ATTENDANCE:

Roberto Yano, Chula Vista
Scott Huth, Coronado
Dan Brogadir, County of San Diego
Dennis Davies, El Cajon
Kristen Crane, Poway
Greg Humora, La Mesa
Erin Bullers, La Mesa
Augie Caires, Padre Dam MWD
Augie Scalzitti, Padre Dam MWD
Al Lau, Padre Dam MWD
Karen Jassoy, Padre Dam MWD

Mark Niemiec, Padre Dam MWD
Rita Bell, Otay WD
Bob Kennedy, Otay WD
Eric Minicilli, City of Del Mar
Amer Barhoumi, City of San Diego
Lee Ann Jones-Santos, City of San Diego
Peggy Merino, City of San Diego
Edgar Patino, City of San Diego
Jamie Richards, City of San Diego
Ann Sasaki, City of San Diego
Karyn Keese, PBS&J/Atkins

- 1. Review and Approve MetroTAC Action Minutes for the Meeting of April 20, 2011**
 - Roberto Yano added a correction to the minutes that the San Diego Strategic Business Plan Group will be coming to June's Metro TAC meeting.
 - Minutes were approved with the correction.
- 2. Metro Commission/JPA Board Meeting Recap**
 - Metro TAC discussed the JPA strategic planning workshop and how TAC would follow-up on work items. A follow-up presentation to the Commission in June was recommended.
 - The JPA Strategic Planning Committee will be meeting to discuss follow-up and 2011/12 action plan.
- 3. Financial Update**
 - Metro 2012 budget is currently being developed and should be presented at the June 2011 Metro TAC meeting.
 - Scott Huth requested that the Metro 2012 CIP budget be presented at the same time.
 - Karyn Keese and Karen Jassoy discussed the JPA's 2011/12 operating budget. Karen Jassoy stated that it was still in preparation but it did not appear that the overall budget would increase from this year. Metro TAC agreed in concept and recommended moving it forward to the Finance Committee and the Metro JPA/Commission for approval.
- 4. Metro Wastewater Update**

- San Diego has agreed to take out the extra strength charges to Padre Dam. This will affect the overall year-end reconciliations of the PAs and San Diego. The City and Padre Dam staffs are still meeting to discuss the overcharges since 1997/98. It was requested that once the issue is resolved that it be brought back to Metro TAC along with a transition plan.
- The County of San Diego stated that they have hired a consultant to look at their strength issues associated with Spring Valley. Springs Valley's bill went up 30% due to increased strength.
- Scott Huth asked if anyone had portable flow meters. The City and Chula Vista indicated that they had ones available.

5. MetroTAC Work Plan (Standing Item)

- Roberto Yano will be joining the Power Tariff group
- Scott Huth and Paula de Sousa will be working on developing the Metro JPA Boards policy document.

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6. Recycled Water Master Plan – TM#8

- It was discussed that the preliminary comments from the PAs were that this TM is confusing and Metro TAC requested a technical briefing by the consultants at their June meeting. The City said they would try to arrange for a technical briefing in June to Metro TAC and a general briefing to the Metro Commission in July.
- It was discussed that the five alternatives presented in TM#8 did not reflect the PAs suggested alternatives.
- Al Lau asked for the backup data for the calculations of the five alternatives.
- The draft report is scheduled to be issued in June 2011.
- PA comments on TM#8 are due to Karyn Keese by May 20, 2011.

7. Recycled Water Revenue

- The City has concurred with the PAs request for recycled water revenue sharing from the South Bay Plant. The City is offering an estimated \$1,237,942 in revenue from sales, incentives, and interest as an income credit to the 2008/09 audit.
- Two issues are still open which City staff stated they will look into. The first is the charge for distribution system maintenance and the other is the sharing of revenue from the capacity reservation charge paid by Otay Water District. These items are to be referred to the JPA's legal counsel for review in light of the Regional Wastewater Disposal Agreement.

8. Atkins 2011/12 Contract

- Karyn Keese reviewed the proposed contract scope and fee. The total fee will essentially stay the same, however Atkins is requesting a \$5 an hour increase in their hourly billing rate.
- Metro TAC unanimously approved recommending the contract's scope and fee to the Finance Committee and the Metro JPA/Commission.

9. Review of Items to be Brought Forward to the Metro Commission/Metro JPA Meeting of June 2, 2011

- JPA operating budget for 2011/12
- Items 5 & 8

- Two CIP items approved by Metro TAC at their April 20, 2011 meeting
- Wrap up presentation on the JPA's Strategic Planning Workshop

10. Other Business of Metro TAC

- None.

11. Adjournment (To the Next Regular Meeting, June 15, 2011)

AGENDA ITEM 4

Attachment

**FOURTH AMENDMENT TO THE AGREEMENT
FOR TREASURER SERVICES BETWEEN METRO
WASTEWATER JOINT POWERS AUTHORITY
AND PADRE DAM MUNICIPAL WATER
DISTRICT**

THIS FOURTH AMENDMENT is made and entered into this ____ day of July, 2011, by and between the Metro Wastewater Joint Powers Authority (herein referred to as "Metro JPA"), a joint powers authority organized and operating pursuant to California Government Code section 6500 *et seq.*, and the Padre Dam Municipal Water District (herein referred to as the "District"), collectively referred to herein as the "Parties."

RECITALS

A. WHEREAS, the Parties did enter into an agreement for treasurer services (hereinafter referred to as the "Agreement") on May 29, 2008 for the District to provide treasurer services to Metro JPA until June 30, 2009; and

B. WHEREAS, the Parties entered into a First Amendment to the Agreement on July 1, 2009 to extend the treasurer's service until June 30, 2010; and

C. WHEREAS, the Parties entered into a Second Amendment to the Agreement on June 3, 2010 to extend the treasurer's service until June 30, 2011; and

D. WHEREAS, the Parties entered into a Third Amendment to the Agreement on December __, 2010 to assign Karen Jassoy, Padre Dam Chief Financial Officer/Director of Finance, to provide the treasurer services referenced in the Agreement; and

E. WHEREAS, the Parties seek to continue the treasurer contract.

NOW THEREFORE, in consideration of the mutual obligations of the Parties herein expressed, the Parties agree as follows:

1. Section 4 of the original Agreement is amended as necessary to extend the end date of treasurer services until June 30, 2012.

2. All other terms and conditions of the original Agreement shall remain in full force and effect.

IN WITNESS WHEREOF, this Fourth Amendment to the Agreement is executed by Metro JPA and by the District on the day and year first written above.

METRO WASTEWATER JOINT
POWERS AUTHORITY

PADRE DAM MUNICIPAL WATER
DISTRICT

By: _____
Ernest Ewin
Chair

By: _____
Allen Carlisle
General Manager

APPROVED AS TO FORM:

BEST BEST & KRIEGER LLP

By: _____
Paula C. P. de Sousa
General Counsel
Metro Wastewater Joint Powers Authority

AGENDA ITEM 6

Attachment

**MetroTAC
2010/2011 Work Plan**

MetroTAC Items	Description	Subcommittee Member(s)
Advanced Water Purification Demonstration Project	San Diego engaged CDM to design/build/operate the project for the water repurification pilot program. <i>2/8/11: Equipment arrived 3/2011; tours will be held when operational (June/July 2011 timeframe)</i>	Al Lau
Fiscal Items	The Finance committee will continue to monitor and report on the financial issues affecting the Metro System and the charges to the PAs. The debt finance and reserve coverage issues have been resolved. Refunds totaling \$12.3 million were sent to most of the PA's.	Greg Humora Scott Huth Karen Jassoy Karyn Keese
Recycled Water Revenue Issue	Per our Regional wastewater Agreement revenues from SBWTP are to be shared with PA's. 4/11: City has agreed to pay out revenue to Wastewater Section and PA's credit will be on the Exhibit E adjustments at year end Open issues: Capacity reservation lease payments and North City Optimized System Debt service status.	Scott Huth Scott Tulloch Karyn Keese
Water Reduction - Impacts on Sewer Rates	The MetroTAC wants to evaluate the possible impact to sewer rates and options as water use goes down, and consequently the sewer flows go down, reducing sewer revenues. Sewer strengths are also increasing because of less water to dilute the waste. We are currently monitoring the effects of this. <i>2/2011:wastewater revenues are declining due to conservation and flow reductions and agencies are re-prioritizing projects to be able to cover annual operations costs</i>	Eric Minicilli Manny Magaña Karyn Keese
"No Drugs Down the Drain"	The state has initiated a program to reduce pharmaceuticals entering the wastewater flows. There have been a number of collection events within the region. The MetroTAC, working in association with the Southern California Alliance of Publicly-owned Treatment Works (SCAP), will continue to monitor proposed legislation and develop educational tools to be used to further reduce the amount of drugs disposed of into the sanitary sewer system. 8/2010: County Sheriff and Chula Vista have set up locations for people to drop off unwanted medications and drugs.4/11: <i>Local law enforcement has taken a proactive role and is sponsoring drug take back events. 3/11: TAC to prepare a position for the board to adopt; look for a regional solution; watch requirements to test/control drugs in wastewater</i>	Greg Humora
Flushable Items that do not Degrade	Several PAs have problems with flushable products, such as personal wipes, that do not degrade and cause blockages. MetroTAC is investigating solutions by other agencies, and a public affairs campaign to raise awareness of the problems caused by flushable products. We are also working with SCAP in their efforts to help formulate state legislation to require manufacturers of products to meet certain criteria prior to labeling them as "flushable." Follow AB2256 and offer support.	Eric Minicilli
Grease Recycling	To reduce fats, oils, and grease (FOG) in the sewer systems, more and more restaurants are being required to collect and dispose of cooking grease. Companies exist that will collect the grease and turn it into energy. MetroTAC is exploring if a regional facility offers cost savings for the PAs. The PAs are also sharing information amongst each other for use in our individual programs. <i>3/11: get update on local progress and status of grease rendering plant near Coronado bridge</i>	Eric Minicilli

MetroTAC Items	Description	Subcommittee Member(s)
"Power Tariff"	Power companies are moving to a peak demand pricing scheme which negatively impacts PAs with pump stations and other high energy uses. MetroTAC wants to evaluate the new legislation and regulations, and to identify and implement cost savings efforts for the PAs. (8/2010): John Helminski at the City of San Diego is working on a sustainability project for CoSD 3/11: <i>Prepare a position paper for the JPA board to consider 4/11: John Helminski no longer works for the City. Request update from Paula.</i> 5/31/11: <i>Roberto Yano met with SCAP representatives. Each agency should meet with their SDG&E representative to determine if there are special programs or incentives they can qualify for .Per SCAP there is no new legislation.</i>	Tom Howard Paula de Sousa Roberto Yano
Recycled Water Study	As part of the secondary waiver process, San Diego agreed to perform a recycled water study within the Metro service area. That study is currently underway, and MetroTAC has representatives participating in the working groups. <i>TM #8 Costs estimates are out and PAs provided comments on TM#8 and have asked for a technical briefing.</i> Draft report due out mid-summer.	Scott Huth Al Lau Karyn Keese Jennifer Duffy
Recycled Water Rate Study	San Diego is working on a rate study for pricing recycled water from the South Bay plant and the North City plant. MetroTAC, in addition to individual PAs, have been engaged in this process and have provided comments on drafts San Diego has produced. We are currently waiting for San Diego to promulgate a new draft which addresses the changes we have requested. <i>draft study still not issued</i>	Karyn Keese Scott Huth Rita Bell
Metro JPA Strategic Initiatives	MetroTAC to develop success measures for the JPA strategic initiatives and suggest a schedule to complete certain items.	Scott Huth Dan Brogadir Karyn Keese
Salt Creek Diversion	9/2010: OWD, Chula Vista and San Diego met to discuss options and who will pay for project; Chula Vista and OWD are reviewing options. 2/2011: OWD and PBS&J reviewed calculations with CoSD staff; San Diego to provide backup data for TAC to review. This option is also covered in the Recycle Water Study.	Roberto Yano Manny Magaña Karyn Keese Rita Bell
Recycled Water Study Cost Allocation	<i>A small working group was formed to discuss options to allocate PLWTP offset project costs among the water and wastewater rate payers; Concepts will be discussed at TAC and JPA Board in near future.</i>	Scott Huth Roberto Yano Al Lau Karyn Keese
Board Members' Items		
Metro JPA Strategic Plan	2/2011: committee to meet 2/28/11 to plan for retreat to be held on 5/5/11 <i>Retreat held and wrap up presented to the Commission at their June Meeting. JPA strategic planning committee to meet to update JPA Strategic Plan and prepare action items.</i>	Augie Caires Ernie Ewin Mark Robak
Rate Case Items	San Diego is starting the process for their next five-year rate case. As part of that process, MetroTAC and the Finance Committee will be monitoring the City's proposals as we move forward.	Karyn Keese
Schedule E	MetroTAC and the Finance Committee are active and will monitor this process. Individual items related to Schedule E will come directly to the Board as they develop.	Karen Jassoy Karyn Keese
Future bonding	MetroTAC and the Finance Committee are active and will monitor this process. Individual items related to bonding efforts will come directly to the Board as they develop.	Karen Jassoy Karyn Keese
Changes in water legislation	MetroTAC and the Board should monitor and report on proposed and new legislation or changes in existing legislation that impact wastewater conveyance, treatment, and disposal, including recycled water issues	Paula de Sousa

MetroTAC Items	Description	Subcommittee Member(s)
Role of Metro JPA regarding Recycled Water	As plans for water reuse unfold and projects are identified, Metro JPA's role must be defined with respect to water reuse and impacts to the various regional sewer treatment and conveyance facilities	Scott Huth Karyn Keese
Border Region	Impacts of sewer treatment and disposal along the international border should be monitored and reported to the Board. These issues would directly affect the South Bay plants on both sides of the border.	
IROC Performance Audits	Work with IROC to identify areas to be audited; participate in audit process. 8/2010: provide the top 5 areas to audit by September IROC meeting.	Augie Caires

Completed Items	Description	Subcommittee Member(s)
Debt Reserve and Operating Reserve Discussion	<p>In March 2010, the JPA approved recommendations developed by Metro JPA Finance Committee, MetroTAC, and the City of San Diego regarding how the PA's will fund the operating reserve and debt financing. MetroTAC has prepared a policy document to memorialize this agreement.</p> <p>Project complete: 4/10</p>	<p>Scott Huth Karyn Keese Doug Wilson</p>
State WDRs & WDR Communications Plan	<p>The Waste Discharge Requirements (WDRs), a statewide requirement that became effective on May 2, 2006, requires all owners of a sewer collection system to prepare a Sewer System Management Plan (SSMP). Agencies' plans have been created. We will continue to work to meet state requirements, taking the opportunity to work together to create efficiencies in producing public outreach literature and implementing public programs.</p> <p>Project complete: 5/10</p>	<p>Dennis Davies Patrick Lund</p>
Ocean Maps from Scripps	<p>Schedule a presentation on the Sea Level Rise research by either Dr. Emily Young, San Diego Foundation, or Karen Goodrich, Tijuana River National Estuarine Research Reserve</p> <p>Project complete: 5/10</p>	<p>Board Member Item</p>
Secondary Waiver	<p>The City of San Diego received approval from the Coastal Commission and now the Waiver is being processed by the EPA. The new 5 year waiver to operate the Point Loma Wastewater Treatment Plant at advanced primary went into effect August 1, 2010.</p> <p>Project complete 7/10</p>	<p>Scott Huth</p>
Lateral Issues	<p>Sewer laterals are owned by the property owners they serve, yet laterals often allow infiltration and roots to the main lines causing maintenance issues. As this is a common problem among PAs, the MetroTAC will gather statistics from national studies and develop solutions.</p> <p>4/11: There has been no change to the issue. We will continue to track this item through SCAP and report back when the issue is active again.. Efforts closed 3/11</p>	<p>Tom Howard Joe Smith</p>

AGENDA ITEM 7

Attachment

Metropolitan Wastewater System - Point Loma Wastewater Treatment Plant

- Future NPDES
Permitting Strategies
- *Preserving Options* •

Point Loma Wastewater Treatment Plant



King-pin of the Metro System



Today's Roadmap

- Purpose : Strategy for Future Permits
- 301(h) "Waiver"
 - Timelines
 - History & Context
- Concerns, Issues and Opportunities
- Options
- Keeping Options Open
- Summary

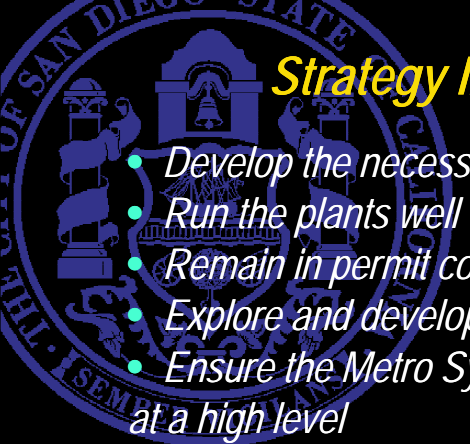
3



Purpose : Strategy for Future Permits

Do what is necessary to ensure that we preserve options for meeting long-term regulatory requirements for wastewater discharges.


4



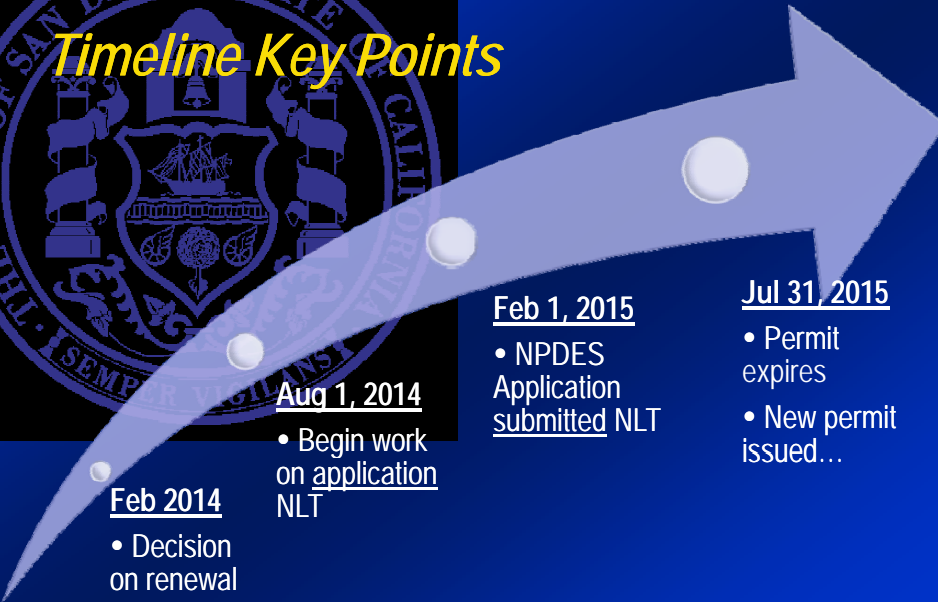
Strategy Includes ...

- *Develop the necessary supporting information*
- *Run the plants well*
- *Remain in permit compliance*
- *Explore and develop appropriate improvements*
- *Ensure the Metro System continues to operate at a high level*
- *Ensure that SSOs continue to be controlled*

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Timeline Key Points



- Feb 2014
 - Decision on renewal strategy
 - Begin App.
- Aug 1, 2014
 - Begin work on application NLT
- Feb 1, 2015
 - NPDES Application submitted NLT
- Jul 31, 2015
 - Permit expires
 - New permit issued...

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Points

- NPDES Permits are renewed every five years, so the waiver must be re-justified every five years.
- If waiver is needed, start work on application 1-year prior (i.e. August 2014)



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PLWWTP – Some Facts



Secondary Treatment Cost Estimates @ 240 MGD

\$2.3 Billion Capital with financing
\$38 Million per year in additional O&M

- **Began operation 1963**
 - Original discharge 2.5 miles offshore at 220 feet deep.
 - Effective 1993 discharge moved to 4.5 miles and 320 feet deep.
 - Originally a primary plant, converted to chemically assisted in 1986.
- **Removals for current advanced primary treatment:**
 - 88% Total Suspended Solids (TSS)
 - Permit limit: 80%
 - 66% Biochemical Oxygen Demand (BOD)
 - Permit limit: 58%
- **King-pin of Metro System**
 - 240 mgd permitted capacity equates to over 80% of the total system capacity. (current flow: 160 mgd)
- **Currently operates with a modified NPDES Permit**

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Where we are

- Pt Loma Wastewater Treatment Plant operates under a unique modified NPDES Permit that allows advanced primary instead of secondary treatment.
- Requirements are unique and fully in compliance with CWA and California Standards.
- At permitted capacity (240 MGD), implementation of Secondary treatment costs \$2.3B in capital and financing; plus another \$38M per/yr O&M.

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NPDES Permits - Historical Context

- | | |
|------|--------------------------------------|
| 1963 | • Pt Loma WWTP startup |
| 1972 | • CWA |
| 1977 | • 301h added to CWA |
| 1979 | • 1 st Waiver application |
| 1986 | • Application Denied |
| 1994 | • OPRA |
| 1995 | • 1 st Waiver Approved |
| 2002 | • Renewed Permit |
| 2010 | • Current Permit Approved |

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Historical Context – Waivers

- Recognition by Congress that secondary standards may not be appropriate everywhere.
- The CWA was changed (section 301h added) allowing a modification to NPDES permit
 - only for three constituents: pH, TSS and BOD
 - had to apply by 7/1/88
- 301h Modified NPDES permits became known as “Waivers”; and are...
 - in full compliance with the CWA
 - protective of the receiving water
- All other requirements are the same or more stringent
- Must comply with all local and state requirements

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Historical Context – San Diego's Permit

- First Waiver application filed in 1979. Denied by EPA in 1986.
 - San Diego declined to address reasons for denial and advised EPA it would not seek further waivers.
 - San Diego negotiated a Consent Decree with EPA for conversion to secondary.
- Judge Brewster rejected the Consent Decree in federal court due to the costs of secondary treatment, and the lack of harm to the environment; found no benefit to secondary at Pt Loma.
- Local delegation proposed the Ocean Pollution Reduction Act (OPRA) to again allow for a waiver application.
 - First Waiver approved November 1995.

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More than just Pt Loma... it's the Metro System

- Control of Industrial and household hazardous wastes (keep them out of the sewers)
 - Urban Area Pretreatment Program
 - Household hazardous waste collection and public education
 - Food Establishment Waste Discharge Program (FEWD)
- Highly effective chemically assisted advanced primary treatment at Pt Loma.
- A long & deep ocean outfall with a high degree of initial dilution.
- Comprehensive monitoring.

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Basis of Recent Decisions to Seek Modified Permit Renewals

- Science
 - Extensive monitoring shows no negative impacts
 - National Research Council recommendations
 - Reviewed by independent science panel
 - Federal Court Decision
 - EPA and RWQCB provide the ultimate independent review
- Provides ability to cost effectively implement critical water reclamation programs.
- Avoids unnecessary burden to environment and ratepayers.
- Continue to monitor and move to appropriate treatment if indicated.

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Concerns, Issues & Challenges

- Only large discharge waiver remaining.
- Subjective interpretation could result in denial.
- Approval process burdensome for EPA.
- Changing regulations.
- EPA sees no “plan” in place for San Diego.
- NGO opposition could result in EPA denial.
- Coastal Commission and Resource Agency concurrence becoming more difficult.
- EPA may be willing to negotiate a favorable consent decree that would be aligned with future facilities planning.

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Possible Future Options

- Reapply for renewal of the current Waiver.
- Reapply for a renewal of the waiver, and (as part of the application) commit to additional water reclamation.
- Commit to converting to secondary, and also include the implementation of additional water reclamation.
- Commit to converting to secondary only.

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Options ... Timelines

- Most advantageous if the option is selected by: February 1, 2014. (*but not mandatory*)
 - Time to work with regulatory agencies and others,
 - Prepare NPDES renewal application,
 - Negotiate terms and conditions if necessary etc. etc.
- Regardless of the option selected an NPDES renewal application must be submitted by February 1, 2015.
- *Right Now*, not enough information is available to make a decision. It's still a work in progress.
- Until a decision is made actions should be taken to keep all options viable.

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Actions to Allow Flexibility in Options

- OPRA/CWA issues
 - Legal determination of the applicability of OPRA
 - Legislative fix to OPRA
 - Secondary Equivalency Legislation
- State Ocean Plan
 - Monitor potential changes, stay engaged
 - Work on compliance with Recreational Water Standards
 - Look at compliance with the CWA 30 mg/l TSS Std.

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Actions to Allow Flexibility in Options

Local Basin Plan

- Continue to fine tune partial disinfection
- Complete outfall plume study
- Continue efforts to modify Basin Plan relating to the application of recreational water standards

California Coastal Commission

- Early on Legal and administrative work to eliminate CCC issues
- Provide report on reclamation study per permit condition
- Insure implementation of Ocean Monitoring modifications (plume work) to address previous concerns

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Actions to Allow Flexibility in Options

Resource Agencies (Fish & Wildlife, National Marine Fisheries)

- Past consultations not a problem
- Cannot guarantee this will continue
- Early on work with staff (begin Feb 2015) necessary

EPA & RWQCB

- New administrations, new managers
- Past success does not guarantee the future
- Early on work with both agencies essential
- EPA expects San Diego to produce a "plan"
- EPA expects discussions on the "plan" before this permit expires

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Actions to Allow Flexibility in Options

- **NGOs**

- EPA may be hesitant to approve waiver without local NGO support.
- Every past waiver had some sort of an agreement with NGOs
- Early on strategy to deal with NGOs essential.

- **Public**

- Outreach and education as soon as possible. Get out ahead of the curve.

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Actions to Allow Flexibility in Options

- **Plant Performance**

- Continue high level of performance. 100% compliance and immediate response to problems.
- Complete anti-degradation report for phenol as detailed in current permit. Complete all other special requirements.
- Investigate what is necessary to comply with CWA 30 mg/l TSS Std
- **Remember:** For a waiver, a plant must be in compliance with all requirements at the time of the permit hearing.
- Although Emerging Contaminants of concern are not yet regulated, continue to proactively address control strategies and studies of effects.

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Actions to Allow Flexibility in Options

Ocean Monitoring

- Perform all required monitoring with the highest level of technical competence
- Maintain enhancements per SIO report
- Complete special studies in accordance with permit and in consultation with EPA, RWQCG, SCCWRP, SIO and NGOs.
- Address recreational water REC-1 issue

- **Industrial Pretreatment**

- Continue the Urban Area Pretreatment Program
- Maintain SIU compliance at 90% or better

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Actions to Allow Flexibility in Options

- **Facility Planning**

- Complete water reclamation planning study
- Investigate compliance with CWA 30 mg/l TSS STD
- Maintain planning studies to assess compliance with OPRA for mass emissions.
- Maintain planning studies to ensure compliance at Pt Loma in view of potential increases in loads.
- Maintain planning studies to demonstrate cost estimates for the implementation of various options

- **Funding**

- Investigate the potential for federal and state funding.
- Investigate (again) the availability of Navy land north of the plant .

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Summary

Strategy at this point...

- No option be excluded
- Pt. Loma comply with permit and all standards
- System-wide management and performance
- Decision makers will have the required information to make an informed decision
 - Monitoring programs to ensure high-quality information
 - Some efforts are beyond the scope of this department

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Key Dates

- Present permit expires: July 31, 2015
- Renewal application due NLT: February 1, 2015
- Decision on renewal strategy by: February 2014

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Point Loma WWTP



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Going Forward

- Metro System situation & PLOO are unique
- All evidence shows no harm to ocean from discharge at Advance Primary
- Too early to make definitive decisions
- Future challenges whatever the course
- Keeping options & flexibility will be challenging

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