



Sacramento Regional County Sanitation District Sacramento Regional Wastewater Treatment Plant

Progress Report Method of Compliance Work Plan and Schedule for Ammonia Effluent Limitations and Title 22 or Equivalent Disinfection Requirements

Submitted: July 9, 2016

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1.0 Introduction

On June 9, 2011, the Sacramento Regional County Sanitation District (Regional San) submitted a Method of Compliance Work Plan and Schedule for Ammonia Effluent Limitations and Title 22 or Equivalent Treatment Requirements (Work Plan). This submittal was required by the compliance schedule contained in the waste discharge requirements Order No. R5-2010-0114 (2010 NPDES Permit¹) adopted by the Central Valley Regional Water Quality Control Board (Regional Board) on December 9, 2010 for the Sacramento Regional Wastewater Treatment Plant (SRWTP). The 2010 NPDES Permit imposed new final effluent limitations for ammonia and nitrate (requiring nutrient reduction facilities) and new requirements for Title 22 or equivalent disinfection requirements (requiring tertiary treatment facilities). The 2010 NPDES Permit required the submittal of annual progress reports following approval of the Work Plan. The Regional Board approved the Work Plan on July 8, 2011.

As a component of a Partial Settlement Agreement, Regional San stated that it will post on its website a second progress report on or before February 1 of each year until completion of the nutrient reduction facilities. Previous progress reports posted on Regional San’s website on or before February 1 provided a status of only the nutrient reduction facilities. At Regional San’s discretion, all future progress reports will also include an update on the tertiary treatment facilities in addition to the nutrient reduction facilities.

On April 21, 2016, Regional Board adopted Order R5-2016-0020 (2016 NPDES Permit) for the SRWTP which rescinds and replaces the 2010 NPDES Permit. The 2016 Permit also requires compliance with final effluent limitations for ammonia and nitrate and Title 22 or equivalent disinfection. The applicable requirements and schedules are reflected in the 2016 Permit and Tables 1 and 2 below.

2.0 Overall Compliance Schedule

The following compliance schedules for Ammonia Effluent Limitations and Title 22 or Equivalent treatment requirements are listed below in Table 1 and Table 2, respectively:

Table 1. Compliance Schedule for Ammonia Final Effluent Limitations

Task	Relevant Dates
i. Submit Method of Compliance Workplan/Schedule	Due Date: 9 June 2011 Date Submitted: 9 June 2011 Date Approved: 8 July 2011 Status: Complete
ii. Submit and Implement PPP for Ammonia ¹	Due Date: 9 December 2011 Date Submitted: 8 December 2011 Revised Plan Submitted: 15 November 2012 Date Approved: 17 May 2013 Status: Complete
iii. Progress Reports ²	Progress report required by permit due 9 July, annually ³

¹ The 2010 NPDES Permit was amended several times. All the amendments were incorporated into Regional Board Order No. R5-2010-0114-04.

Method of Compliance Workplan For Ammonia

Task	Relevant Dates
iv. Begin CEQA process for Compliance Project	Due Date: 19 May 2015 Process Initiated: 22 August 2012 Date EIR Approved: 24 September 2014 Status: Complete
v. Begin Construction of Compliance Project	Due Date: 19 May 2018 Status: Complete
vi. Full Compliance	Due Date: 11 May 2021

¹The Discharger shall continue to implement the PPP.

²The progress reports shall detail the steps implemented towards achieving compliance with waste discharge requirements, including studies, construction progress, evaluation of measures implemented, and recommendations for additional measures as necessary to achieve full compliance by the final compliance date.

³Regional San will prepare an additional report annually, to be posted on the Regional San's website on or before February 1 of each year, beginning in 2014. This additional report is not required by the 2016 NPDES Permit, but is a report the Partial Settlement Agreement states that Regional San will prepare. Both reports will be posted on Regional San's website but only the report required by July 9 will be transmitted directly to the Regional Board.

Table 2. Compliance Schedule for Title 22 or Equivalent Treatment Requirements

Task	Relevant Dates
i. Submit Method of Compliance Workplan/Schedule	Due Date: 9 June 2011 Date Submitted: 9 June 2011 Date Approved: 8 July 2011 Status: Complete
ii. Progress Reports ¹	Progress report required by permit due 9 July, annually
iii. Begin CEQA process for Compliance Project	Due Date: 16 May, 2017 Process Initiated: 22 August 2012 Date EIR Approved: 24 September 2014 Status: Complete
iv. Begin Construction of Compliance Project	Due Date: 16 May 2020
v. Submit Seasonal Operations Plan ²	No later than 30 days prior to full compliance
vi. Full Compliance	Due Date: 9 May 2023

¹The progress reports shall detail the steps implemented towards achieving compliance with waste discharge requirements, including studies, construction progress, evaluation of measures implemented, and recommendations for additional measures as necessary to achieve full compliance by the final compliance date.

²The plan shall incorporate as a goal to reasonably limit the amount of unfiltered discharge and describe anticipated operations of the Facility when flows in excess of filter design capacity occur considering influent flows to the entire Facility, available storage, river flows, impending meteorological conditions, and any other relevant operational considerations. This plan will be periodically updated, as necessary, based on accumulated operating data experience.

Installation of advanced treatment technologies is needed to meet the new discharge permit requirements. To construct the required treatment facilities, Regional San identified other major activities needed to achieve compliance with the NPDES Permit requirements, including:

- Treatment Technology Identification - Completed
- Pilot Study Implementation
 - ❖ Phase 1 - Treatment Technology Selection - Completed
 - ❖ Phase 2 - Design Criteria Optimization - Completed
 - ❖ Phase 3 - Process optimization and operator training - In planning
- Establishment of the Program Management Office (PMO) - Completed

- Select treatment technologies for environmental review, design, and implementation - Completed
- Design full-scale treatment systems - In progress
- Environmental Analysis - Completed
- Construction Phase – In progress
- Startup and Commissioning - In planning

3.0 Progress towards Compliance

The following is a summary of the various activities associated with complying with the Ammonia Effluent Limitations and Title 22 or Equivalent requirements. The summary provided here is the information required as part of the permit requirements.

3.1 Pilot Study Implementation

The Phase 2 pilot system was completed in December 2014. A final report was completed in December 2015.

The goal of Phase 3 Pilot Study is to further optimize the biological process and provide training to operators. This phase is not required to successfully commission the new facilities.

3.2 Design of Treatment Systems

Design consultants have been procured to provide pre-designs and final designs of various individual treatment systems and project features. Table 3 lists the major projects required to meet nutrient related (i.e., final ammonia and nitrate) limitations and Title 22 or Equivalent treatment requirements. Major design projects, as defined in the Partial Settlement Agreement, are those with a design contract in excess of \$1 million. Dates in bold are actual dates of accomplishment. Other dates are planned dates. Regional San has determined that construction completion will be designated as when nutrient reduction facilities and the Title 22 or Equivalent treatment facilities are commissioned respectively as systems. Additional project information is included in Appendix A.

Table 3. Major EchoWater Projects

Major Project	Design Contract Award	Construction Contract Award	Construction Completion
Biological Nutrient Removal	22 Feb 2013	27 Apr 2016	14 Jan 2021
Flow Equalization	28 Aug 2013	25 Feb 2015	11 Apr 2018
Primary Effluent Pumping Station	23 Oct 2013	Combined with BNR	-
RAS Pumping System	13 Nov 2013	25 May 2016	31 May 2019
Building Relocations	25 Sep 2013	19 Mar 2015	29 Feb 2016
Site Preparation	11 Dec 2013	25 Feb 2015	15 Sep 2016
Main Electrical Substation Expansion	In House Design	01 Jan 2016	30 Sep 2016
Disinfection Chemical Storage	11 Dec 2013	22 Jul 2015	25 Jan 2017
Nitrifying Sidestream Treatment	26 Mar 2014	13 Jan 2016	31 Oct 2018
Tertiary Treatment Facilities	27 May 2015	20 Jun 2018	09 Nov 2022

3.3 Environmental Analysis

The CEQA process was initiated on August 22, 2012 and the Final Environmental Impact Report (EIR) was certified by the Regional San Board of Directors on September 24, 2014.

3.4 Construction Phase

Construction of treatment facilities was initiated in March 2015 for three of the major projects required for the ammonia and nitrate and Title 22 or Equivalent treatment facilities. One major project was completed in February 2016. There are currently seven major projects under construction.

3.5 Startup and Commissioning

Startup and commissioning for each project will occur as major treatment processes are completed and existing processes are cut over as required. Additional time is required to start up and commission the new facilities to ensure stable process operation. Regional San is defining full compliance as completion of this phase of the last project (the Tertiary Treatment Facilities). This phase is anticipated to be accomplished before May 2023.

3.6 Regional San Project Acceptance

This milestone of the project is a contractual step to formally close out the construction project and is subject to Regional San Board action. Treatment facilities will have already been commissioned and will be fully operational. This date is subject to the nearest Board meeting after all contractual issues have been resolved and is not the measure of full compliance.

3.7 Ammonia Pollution Prevention

As stated in the November 2012 revised Ammonia PPP, domestic waste contributes the majority of ammonia in the treatment plant influent. Most of the ammonia found in domestic waste is derived from urea, which breaks down rapidly to ammonia in the wastewater conveyance system. Therefore, the primary source of ammonia to the sewer system is considered uncontrollable.

The measured average influent concentration was 35 milligrams per liter (mg/L) for the period January 1 to May 31, 2016, which is slightly down from 38 mg/L reported in the last progress report. Flows were slightly higher than last period due to rain.

Regional San continues to monitor industrial ammonia and total Kjeldahl nitrogen contributions from permitted users through its pretreatment program pollutant accounting activities. Industrial point sources remain a relatively insignificant source of ammonia. Also, no new point source discharges have been identified in the last year. Regional San will continue to monitor existing point source dischargers of ammonia and will screen potential new point source dischargers for the presence of ammonia in their discharge.

Further, Regional San has continued the implementation of interim operational changes, namely the cessation of solids storage basin (SSB) flushing since May 2009, which has resulted in reductions in effluent ammonia discharged to the river by approximately 10 percent.

Regional San is committed to continuing those interim operational changes as long as feasible, pending any process concerns that may develop due to algal blooms, odor generation or struvite accumulation. Short-term sporadic flushing may be implemented during winter to mitigate any process concerns noted above or to reduce the potential of any wet weather induced slug loads from the SSBs.

4.0 Schedule

Regional San has been making progress and is on schedule to meet the compliance dates for ammonia and nitrate and Title 22 or Equivalent permit requirements. Designs have been completed for all of the projects required to construct the necessary treatment facilities to meet the ammonia and nitrate reduction requirements. The current schedule indicates that full system commissioning of the nutrient reduction facilities is on schedule to be accomplished before May 2021. Design is underway for the treatment facilities needed to meet the Title 22 or equivalent requirements. Regional San staff continues to identify and evaluate means by which compliance can be accelerated without unacceptable risks or costs.

A detailed Program schedule (updated in June 2016) is included in Appendix B showing the major projects as well as other projects and work efforts required to comply with the final effluent limitations for ammonia and nitrate limitations and for Title 22 or Equivalent requirements. The high level schedule shown in Table 3 reflects more recent updates to key project milestones.

Appendices

- A. Status of Ammonia and Nitrate Reduction and Title 22 or Equivalent Projects
- B. Workplan Schedule for Compliance

Appendix A

Status of Ammonia and Nitrate Reduction and Title 22 or Equivalent Projects

Status of Ammonia and Nitrate Reduction and Title 22 or Equivalent Projects

Biological Nutrient Removal

The project advertised for bids on October 28, 2015. A construction contract was awarded on April 27, 2016 and Notice to Proceed was issued on May 27, 2016. Construction is scheduled to be completed by January 2021. The project is on schedule to meet this date.

Flow Equalization

A construction contract was awarded on February 25, 2015 and Notice to Proceed was issued on March 4, 2015. Construction is underway and is scheduled to be completed by April 11, 2018. The project is on schedule to meet this date.

Primary Effluent Pumping Station

Construction of this project has been combined with the Biological Nutrient Removal project and future updates will be included with the Biological Nutrient Removal project.

RAS Pumping System

The project advertised for bids on January 13, 2016 and a contract was awarded on May 25, 2016. Notice to Proceed was issued on June 15, 2016. Construction is expected to be completed by May 31, 2019. The project is on schedule to meet this date.

Building Relocations

A construction contract was awarded on March 19, 2015, Notice to Proceed was issued on April 7, 2015, and construction was completed on February 29, 2016.

Site Preparation

A construction contract was awarded on February 25, 2015 and Notice to Proceed was issued on March 11, 2015. Construction is underway, projected to be complete by September 15, 2016 and is on schedule to meet this date.

Main Electrical Substation Expansion

A construction contract was awarded on January 7, 2016. Notice to Proceed was issued on January 8, 2016. Construction is expected to be completed by September 30, 2016. The project is on schedule to meet this date.

Disinfection Chemical Storage

A construction contract was awarded on July 22, 2015 and Notice to Proceed was issued on August 20, 2015. The project is expected to be completed by January 25, 2017. The project is on schedule to meet this date.

Nitrifying Sidestream Treatment

The contract was awarded on January 13, 2016 and Notice to Proceed was issued on February 19, 2016. Construction is expected to be completed by October 31, 2018. The project is on schedule to meet this date.

Tertiary Treatment Facilities

The Filtration and Filter Influent Pumping Station and the Disinfection Contact Basin projects have been combined into a single project called the Tertiary Treatment Facilities. A design contract was awarded on May 27, 2015 and preliminary design was completed in April 2016. Final design efforts are underway and design is expected to be completed by May 2018. The project is on schedule to meet this milestone.

Appendix B

Workplan Schedule for Compliance

Activity ID	Activity Name	Original Duration	Remaining Duration	Start	Finish	Total Float	Gantt Chart (2012-2023)																							
Sacramento Regional County Sanitation District							[Gantt Chart]																							
ECHO WATER PROJECT							[Gantt Chart]																							
Program Summary							[Gantt Chart]																							
Pilot Plant							[Gantt Chart]																							
CEQA Clearance (CEQA)							[Gantt Chart]																							
Design & Construction of Projects							[Gantt Chart]																							
Dwight Road Extension (DRE)							[Gantt Chart]																							
Bldg Relocation-PMO/CMID Building (PMO)							[Gantt Chart]																							
Bldg Relocation-Harvest Crew, Bufferlands Bldgs (BHC)							[Gantt Chart]																							
Bldg Relocation-Heavy Equip Maintenance (HEMB)							[Gantt Chart]																							
SM-Grit Landfill Clean Closure (GLC) (Plan & Design Only)							[Gantt Chart]																							
SM-Main Electrical Substation Expansion Project (MESE)							[Gantt Chart]																							
SM-Site Preparation (SP)							[Gantt Chart]																							

■ Remaining Level of Effort ■ Remaining Work ◆ Milestone
■ Actual Level of Effort ■ Critical Remaining Work ◆ Gates
■ Actual Work ■ Summary



Activity ID	Activity Name	Original Duration	Remaining Duration	Start	Finish	Total Float	2012 2013 2014 2015 2016 2017 2018 2019 2020 2021 2022 2023																																															
	Disinfection Planning - Ph1 Chemical Storage	412	0	09-Jul-12 A	07-Feb-14 A		[Gantt bar: 09-Jul-12 to 07-Feb-14]																																															
	Disinfection Design - Ph1 Chemical Storage	443	0	12-Dec-13 A	30-Jun-15 A		[Gantt bar: 12-Dec-13 to 30-Jun-15]																																															
	Disinfection Bid and Award - Ph1 Chemical Storage	95	0	14-May-15 A	20-Aug-15 A		[Gantt bar: 14-May-15 to 20-Aug-15]																																															
	Disinfection Construction - Ph1 Chemical Storage	536	150	20-Aug-15 A	23-Dec-16	1586	[Gantt bar: 20-Aug-15 to 23-Dec-16]																																															
	Disinfection Commissioning - Ph1 Chemical Storage	121	101	18-Apr-16 A	23-Oct-16	1377	[Gantt bar: 18-Apr-16 to 23-Oct-16]																																															
	Disinfection Closeout - Ph1 Chemical Storage	123	123	28-Jun-16	23-Dec-16	1340	[Gantt bar: 28-Jun-16 to 23-Dec-16]																																															
	Nitrifying Sidestream Treatment (NST)	1416	797	06-May-13 A	15-Jan-19	1075	[Summary bar: 06-May-13 to 15-Jan-19]																																															
	Nitrifying Sidestream Planning	332	0	06-May-13 A	14-May-14 A		[Gantt bar: 06-May-13 to 14-May-14]																																															
	Nitrifying Sidestream Design	445	124	26-Mar-14 A	02-May-16	202	[Gantt bar: 26-Mar-14 to 02-May-16]																																															
	Nitrifying Sidestream Bid and Award	131	0	16-Sep-15 A	02-May-16	1749	[Gantt bar: 16-Sep-15 to 02-May-16]																																															
	Nitrifying Sidestream Construction	755	677	19-Feb-16 A	02-Jan-19	0	[Gantt bar: 19-Feb-16 to 02-Jan-19]																																															
	Nitrifying Sidestream Commissioning	314	314	16-Aug-17	20-Nov-18	1111	[Gantt bar: 16-Aug-17 to 20-Nov-18]																																															
	Nitrifying Sidestream Closeout	36	36	20-Nov-18	15-Jan-19	829	[Gantt bar: 20-Nov-18 to 15-Jan-19]																																															
	Reliability Centered Design Analysis (RCD)	2284	1734	04-Feb-13 A	20-Oct-22	144	[Summary bar: 04-Feb-13 to 20-Oct-22]																																															
	RCD Project Initiation	18	0	04-Feb-13 A	28-Feb-13 A		[Gantt bar: 04-Feb-13 to 28-Feb-13]																																															
	RCD Project Definition and Planning	33	0	18-Feb-13 A	04-Apr-13 A		[Gantt bar: 18-Feb-13 to 04-Apr-13]																																															
	RCD Consultant Selection	98	0	01-Apr-13 A	16-Aug-13 A		[Gantt bar: 01-Apr-13 to 16-Aug-13]																																															
	RCD Project Plan Development	712	52	19-Aug-13 A	10-May-16	1626	[Gantt bar: 19-Aug-13 to 10-May-16]																																															
	RCD Project Support	1925	1734	23-Jun-14 A	20-Oct-22	144	[Gantt bar: 23-Jun-14 to 20-Oct-22]																																															
	Plant Computer Control System (PCCS)	1950	1625	02-Jun-14 A	25-May-22	253	[Summary bar: 02-Jun-14 to 25-May-22]																																															
	PCCS Project Management	60	1565	02-Jun-14 A	25-Feb-22	313	[Gantt bar: 02-Jun-14 to 25-Feb-22]																																															
	PCCS Programming Standards & Guidelines	260	0	31-Jul-14 A	04-Jan-16 A		[Gantt bar: 31-Jul-14 to 04-Jan-16]																																															
	PCCS Training for Programmers	155	23	31-Aug-15 A	01-Jul-16	1788	[Gantt bar: 31-Aug-15 to 01-Jul-16]																																															
	PCCS Design Review	399	40	10-Oct-14 A	09-Jun-16	1626	[Gantt bar: 10-Oct-14 to 09-Jun-16]																																															
	PCCS Project Meetings	1720	1620	19-Aug-15 A	13-May-22	253	[Gantt bar: 19-Aug-15 to 13-May-22]																																															
	PCCS Programming	1586	1535	01-Oct-15 A	14-Jun-22	343	[Gantt bar: 01-Oct-15 to 14-Jun-22]																																															
	PCCS Bench Test Programs	1166	1166	13-May-16	30-Oct-20	572	[Gantt bar: 13-May-16 to 30-Oct-20]																																															
	PCCS Field Test Programs	1521	1521	23-Jul-16	20-May-22	253	[Gantt bar: 23-Jul-16 to 20-May-22]																																															
	PCCS Training & Documentation	1890	1441	02-Jun-14 A	25-Feb-22	313	[Gantt bar: 02-Jun-14 to 25-Feb-22]																																															
	Program Float	110	110	08-Dec-22	10-May-23	0	[Summary bar: 08-Dec-22 to 10-May-23]																																															
	Discharge Permit Compliance Ammonia (5/11/21)	0	0	06-Nov-20	06-Nov-20	138	[Summary bar: 06-Nov-20 to 06-Nov-20]																																															
	Discharge Permit Compliance Title 22 Equiv (5/11/23)	0	0	11-May-23	11-May-23	0	[Summary bar: 11-May-23 to 11-May-23]																																															

■ Remaining Level of Effort
 ■ Remaining Work
 ◆ Milestone
■ Actual Level of Effort
 ■ Critical Remaining Work
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