



Change in Local Limits to Reduce Total Dissolved Solid Levels from Regulated Industries

Public Works Department

City Council

March 20, 2018

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BACKGROUND

1. The Regional Water Quality Control Plant (RWQCP) National Pollutant Discharge Elimination System Permit (NPDES Permit) requires the City to implement an Industrial Waste Pretreatment Program.
2. RMC Section 14.12.350 Local Limits regulates the discharge of pollutants from industrial users to the wastewater system.
3. Local Limits are established for priority pollutants to keep levels below that which could impair RWQCP treatment processes or cause pass-through to the Santa Ana River.



2

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BACKGROUND

4. Total Dissolved Solids (TDS) is a pollutant that is regulated by Local Limits - TDS is essential salts.
5. The RWQCP treatment process is not designed to remove TDS and is considered a pass-through pollutant.
6. The current local limit of TDS is 2,500 mg/L and was implemented in 2002.
7. To change a limit requires a special project. A TDS Sampling Plan was developed to characterize the loading in the collection system.



3

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DISCUSSION – TDS SAMPLE PLAN

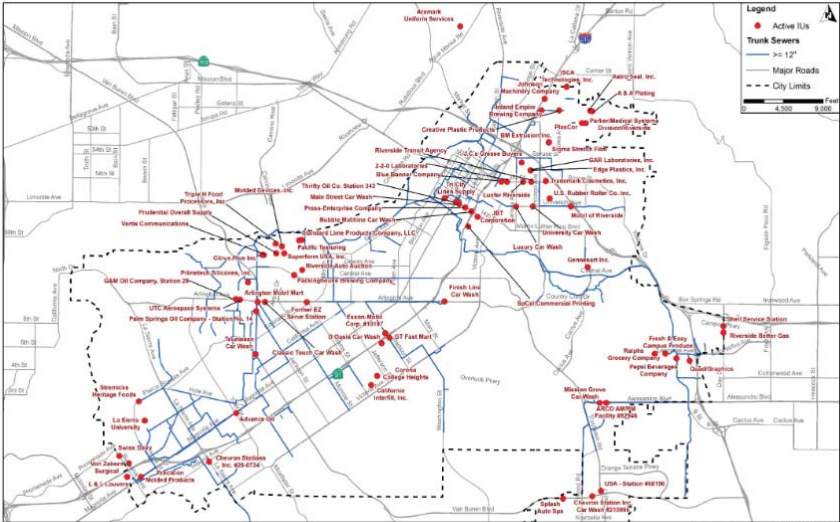
1. In total, 69 separate samples from sewer manholes were collected.
2. RWQCP Environmental Compliance Staff collected the samples.
3. RWQCP Laboratory staff conducted the analysis.
4. Utilizing in-house staff saved the City approximately \$75,000.



4

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DISCUSSION – TDS SAMPLE PLAN



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DISCUSSION – STAFF SAMPLE COLLECTION



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DISCUSSION – STAFF SAMPLE COLLECTION



7



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DISCUSSION – TDS DEVELOPMENT REPORT

1. Krieger & Stewart Inc., of Riverside CA, was retained to:
 - a. Prepare the Sampling Plan
 - b. Evaluate the TDS Loading to RWQCP
 - c. Develop a proposed TDS Limit
 - d. Prepare a TDS Development Report
2. The Project concluded that the TDS Local Limit should be reduced from 2,500 mg/L to 1,210 mg/L.
3. Existing Industrial Users should be capped at their current TDS loading discharge level. The new Local Limit would apply to future business expansion.
4. Local Limit will apply to all new businesses and sources who discharge into the collection system.

8



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DISCUSSION – BUSINESS OUTREACH

1. A review of all available TDS data from over 700 permitted dischargers, about 2% of industrial business, or sixteen (16), will be impacted by the new TDS local limit.
2. Over 700 informational letters were sent to all permitted business.
3. Contacted the Riverside Chamber of Commerce to provide information on the change and business outreach conducted.
4. Sewer Public Benefit Program (Commercial) – The City's Sewer Public Benefit Program was approved in 2010 and is available to assist new and existing businesses. The program offers reimbursements for up to fifty percent of the cost of City approved wastewater treatment equipment that reduces pollutant levels. The reimbursement is capped at \$150,000 per customer.



9

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DISCUSSION – BUSINESS OUTREACH

Met with sixteen (16) Impacted Industrial Business

Date of Meeting	Riverside Permitted Business	Date of Meeting	Riverside Permitted Business
9/20/17	Carbonlite	10/3/17	Corona College Heights
9/21/17	Pepsi	10/3/17	Molded Devices Inc.
9/22/17	Garden Horizon Foods	10/4/17	Stremicks
9/25/17	Jimenez Distr.	10/4/17	Trademark
9/26/17	Kroger	10/11/17	Blue Banner
9/26/17	OSI	10/11/17	J.C. Grease
9/28/17	Prudential	10/11/17	2-2-0 Labs
9/28/17	Triple H	10/19/17	Von Z



10

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DISCUSSION – COMMUNITY SERVICE DISTRICT'S

1. Under our wastewater service agreements, the Rubidoux, Jurupa and Edgemont Community Service Districts are required:
 - a. Adopt and implement the proposed Local Limits within their service area jurisdictions.
 - a. Continue to deliver a quality of wastewater to the Regional Water Quality Control Plant which independently complies with the City NPDES permit.



11

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DISCUSSION – COMMUNITY SERVICE DISTRICT'S

2. Staff provide updates on the Local Limit study to CSD's at the Technical Advisor Committee on December 6, 2016.
3. February 8, 2018 staff mailed letters to CSD's announcing the TDS local limit study will be considered by the City Council on March 20, 2018.
4. Staff will be available to assist CSD's on adoption and implementation.



12

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RECOMMENDATIONS

That City Council adopt the attached Resolution to update Riverside Municipal Code Title 14.12.350, Discharge of Wastes into the Public Sewer and Pollutants into the Storm Drain Systems, Industrial Waste, Local Limits.

