



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

State-Mandated Chloride (Salt) Requirements in Santa Clarita Valley

About the Santa Clarita Valley Sanitation District

1. Who is the Santa Clarita Valley Sanitation District?

The Santa Clarita Valley Sanitation District (SCV Sanitation District) is a special district responsible for collecting, treating, and disposing of wastewater (sewage) and industrial waste from the City of Santa Clarita and unincorporated areas of the Santa Clarita Valley. The SCV Sanitation District is governed by a three-person board consisting of two members of the City of Santa Clarita Council and one member of the Los Angeles County Board of Supervisors.

2. What services does the SCV Sanitation District provide?

The SCV Sanitation District provides an essential service that protects public health throughout the Santa Clarita Valley. The District operates and maintains the Valley's regional sewer system, including two wastewater (sewage) treatment facilities. The Valley's wastewater (sewage) is collected from residential and business properties and transported through the local sewer system, owned and maintained by the City of Santa Clarita or Los Angeles County, to the District's two treatment facilities, where the wastewater is treated. The recycled water produced is either discharged to the Santa Clara River or is used for landscape irrigation in the Valley. The SCV District is responsible for making sure that the content and quality of the treated wastewater meets strict federal and state limits.

The Chloride (Salt) Problem in the Santa Clarita Valley

3. What is the Chloride (Salt) Problem?

The amount of salt in the Valley's treated wastewater is above the legal limit set by the State, and the existing treatment facilities need to be upgraded to remove salt to meet the State-mandated limit. If the Santa Clarita Valley does not meet the State's strict salt limits, the State can issue steep fines, which all property owners would have to pay, in addition to the costs of building the new facilities. The State can also take away local control of the SCV Sanitation District.

4. Where does the chloride (salt) in Santa Clarita Valley's wastewater come from?

It comes from 1) the Valley's water supply consisting of local groundwater and water imported from Northern California; 2) soaps, shampoos and cleaning agents from normal daily residential, commercial and industrial uses in the Valley; and 3) treatment processes at the Valley's wastewater treatment plants. Chloride (salt) occurs naturally in the Valley's water supplies, and levels vary

Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

depending on rainfall. When people use water in their homes and businesses, the chloride (salt) levels in the Valley’s wastewater/sewage increases significantly.

Sources of Chloride (Salt) in Santa Clarita Valley Water
in milligrams per liter (mg/L)

Source of Chloride (Salt)	Source of Chloride (Salt)	% of Total Chloride (Salt) Added
Salt content of fresh water supply piped to homes and businesses (groundwater and imported water)	45-85 mg/L	45% - 60%
Salt added by homes and businesses through everyday uses to water before entering sewer system	45 mg/L	45% - 32%
Salt added by wastewater (sewage) treatment processes.	10 mg/L	10% - 8 %
Total	100-140 mg/L	100%

5. What is the scientific basis for the State’s chloride (salt) limit for the SC Valley? Who conducted the studies and who paid for them?

As part of a settlement agreement with the California Regional Water Quality Control Board - Los Angeles Region (Water Quality Board), the SCV Sanitation District was required to fund the scientific studies conducted to re-assess the salt limit. All of the scientific studies were conducted in a collaborative public process structured by the Water Quality Board, which involved a number of stakeholders in Los Angeles and Ventura Counties. The studies were conducted by expert consultants selected jointly by the SCV Sanitation District and the Water Quality Board. The results of the studies were reviewed by an independent technical advisory panel made up of experts in each study’s respective field. To view the scientific studies conducted between 2004 and 2008, please go to the Sanitation District’s website at http://www.lacsd.org/wastewater/chloridefacplannop/background_documents.asp.



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

6. Why didn't the removal of Automatic Water Softeners in Santa Clarita reduce chloride (salt) levels enough to meet the State limit?

Santa Clarita Valley residents who have removed their Automatic Water Softeners are to be commended for their role in keeping sewer service charge rates as low as possible. The removal of Automatic Water Softeners significantly reduced the chloride (salt) levels in the Valley's wastewater, which will save over \$100 million in capital and operating costs to upgrade the wastewater (sewage) treatment plants. Although the removal of Automatic Water Softeners made major strides in lowering chloride (salt) levels, it was not enough to bring the plants into full compliance with the State-mandated limit, especially in dry years.

7. Is the Valley's chloride (salt) problem the result of increases in the use of imported water from new development?

No. New development did not cause the State's limit on salt to be exceeded. The Valley's two wastewater (sewage) treatment plants have consistently been above the State chloride (salt) limit since before 1975. The Valley's wastewater (sewage) is above the State's salt limit because of the amount of salt that homes and businesses add every day through normal daily activities, the levels in imported water and local groundwater, and the existing treatment processes that add chloride.

8. How will the temporary treatment of wastewater (sewage) from Newhall Ranch development impact the costs for compliance with the State's salt (chloride) limits for the Santa Clarita Valley?

There will be no impact on the cost for compliance with the State's chloride limit for the Valley as a result of the Newhall Ranch development. Newhall Ranch can temporarily connect the first 6,000 units to the existing Sanitation District system provided it pays the same connection fee and annual service charge that any new users would pay. Newhall Ranch must also construct and operate, at no cost to the SCV District, a chloride removal process for the wastewater generated by the 6,000 units. Lastly, Newhall Ranch is required to build a new wastewater treatment plant for their entire development at no cost to the SCV District.

State-Mandated Chloride (Salt) Limits in the Santa Clarita Valley

9. Why are there Federal and State-mandated chloride (salt) limits for the Santa Clarita Valley?

The U.S. Environmental Protection Agency (EPA) enforces the U.S. Clean Water Act and has delegated their authority to the California State Water Resources Control Board.



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

The State enforces the State Clean Water Act as well as the State's Porter Cologne Act, by setting strict limits on the contents of treated wastewater, and establishing timelines for local districts to comply with those limits. The limits are set to protect the most sensitive beneficial uses of water bodies. In the case of the Santa Clara River, chloride limits were set to protect both existing water quality and the designated salt-sensitive agriculture beneficial use.

What is the State limit on chloride (salt) for the Santa Clarita Valley?

The State limit is 100 milligrams per liter (mg/L) chloride (salt) for treated wastewater leaving the two treatment plants.

10. Is the Santa Clarita Valley meeting the State's legal limit on chloride (salt)?

No. The chloride (salt) levels in the Sanitation District's wastewater treatment plant discharges do not meet the state legal limit of 100 mg/L. As stated above the chloride levels have consistently exceeded the state limit of 100 mg/L since before 1975.

In 2004, the Water Quality Board approved higher temporary chloride limits to allow the SCV Sanitation District to construct new treatment facilities. The temporary limits expire July 1, 2019.

11. Is the Santa Clarita Valley the only place facing strict State limits on chloride (salt)? How are other communities complying with State chloride (salt) limits?

No, other communities along the Santa Clara River are facing problems with chlorides (salt) and salinity management.

The communities of Piru, Fillmore, and Santa Paula have recently upgraded their wastewater treatment facilities and eliminated their discharge to the Santa Clara River due to State limits for salt. The Piru Wastewater Treatment Plant, which discharges only 0.5 million gallons per day (2.5% of the SCV Sanitation District's discharge), now discharges to percolation ponds instead of the river. The Piru Wastewater Treatment Plant has a discharge limit of 100 mg/L unless they can demonstrate any exceedance is due to uncontrollable sources. The City of Fillmore has also eliminated discharge from the Fillmore Wastewater Treatment Plant to the Santa Clara River through recycling and/or subsurface disposal and passed an ordinance banning automatic water softeners to reduce chloride levels. The Fillmore Wastewater Treatment Plant has a groundwater receiving water limit of 100 mg/L. The City of Santa Paula has also constructed a new treatment plant to eliminate discharges to the river through water recycling, percolation, and/or evaporation ponds and have passed an ordinance banning automatic water softeners. The Santa Paula Wastewater Recycling Facility has a discharge limit of 110 mg/L.



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

This approach of diverting treated wastewater flows from the Santa Clara River is not feasible in the Santa Clarita Valley. Unlike the SCV Sanitation District, these communities have much smaller treatment plant effluent flows that could be diverted from the river without having a significant effect on riparian habitat.

In the Calleguas Creek Watershed of Ventura County, the State requires that water and wastewater agencies build facilities to export excess salts from the watershed and maintain an overall salt balance, reduce salt loading to surface waters and groundwater, and meet State limits for salts in the watershed. Water and wastewater agencies propose to construct desalination facilities and a regional brine line and ocean outfall to dispose of the waste brine.

12. What is the History of the U.S. Clean Water Act?

The Federal Water Pollution Control Act of 1948 was the first major U.S. law to address water pollution. Growing public awareness of significant water pollution problems and widespread public support for strong new measures to address water pollution led to sweeping amendments of the Act in 1972 and 1977, whereby the law became commonly known as the Clean Water Act. The Clean Water Act requires States to establish beneficial uses and water quality standards to protect all uses for waters of the United States.

State Enforcement of Chloride (Salt) Limit and Fines

13. Has the State issued fines in the Santa Clarita Valley for failing to meet the State's chloride (salt) requirements?

Yes. On May 27, 2011, the Water Quality Board issued two enforcement orders (Notices of Violation) to the SCV Sanitation District for failure to comply with the State mandated schedule for compliance with the salt limit. On November 26, 2012, the Water Quality Board issued a Complaint for Administrative Civil Liability (fine) for more than \$280,000 against the Sanitation District for these violations, which was settled for \$225,000.

In addition, in December 2008 and March 2007, the Water Quality Board issued fines in the amount of \$168,000 each to the Sanitation District for the Saugus and Valencia WRPs for violations, including violations of the salt limits between the years 2002 and 2003 at the Saugus WRP and between 2001 and 2004 at the Valencia WRP.

14. Would Santa Clarita Valley property owners have to pay State fines?

Yes. All users of the SCV Sanitation District's sewerage system (Santa Clarita Valley property owners) would pay any fines the State imposes for failing to meet the State's chloride (salt) standards.



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

15. Who appoints the State Water Quality Control Board - Los Angeles Region and the State Water Resources Control Board?

The Los Angeles Regional Water Quality Control Board is one of nine Water Quality Boards within the state. Each Water Quality Board is made up of seven part-time Members appointed by the Governor and confirmed by the Senate. The State Water Resources Control Board is made up of five full-time Members appointed to four-year terms by the Governor and confirmed by the Senate.

Additional information on the Water Quality Board is available online at <http://www.waterboards.ca.gov/losangeles> (Regional Water Quality Board), and <http://www.waterboards.ca.gov/> (State Water Resources Control Board).

16. When can the State impose fines?

The State can levy fines any time the SCV Sanitation District violates its permit conditions. Fines can be issued for failure to meet schedule milestones contained in the permit. When the temporary chloride limits expire in July 2019, the State can levy fines on a monthly basis and on a discretionary per gallon basis for failure to meet the 100 mg/L chloride limit.

17. Has the SCV Sanitation District fought the State's Chloride (Salt) limits?

The Sanitation District has challenged the State's chloride (salt) limits at every opportunity for more than a decade. In 2000, the Sanitation District sought permanent relaxation of the salt limits from 100 mg/L to 143 mg/L but the Water Quality Board rejected the changes sought by the Sanitation District. In 2002, the Water Quality Board adopted the Total Maximum Daily Load (TMDL) 100 mg/L standard for chloride. The Sanitation District appealed these requirements to the State Water Resources Control Board. In 2004 a settlement agreement with the state allowed a longer compliance schedule until 2018. In 2006 the Water Quality Board shortened the compliance schedule to 2016. The Sanitation District appealed this decision to the State Water Resources Control Board, but the State Water Resources Control Board approved the shortened schedule, and admonished all parties to work together for a solution. Subsequently, the Sanitation District began working with all stakeholders, including Ventura County interests, on an alternative compliance plan. In 2008, the Water Quality Board approved the alternative compliance plan and established a compliance schedule with temporary chloride limits that expire in May 4, 2015. The temporary chloride limits were later extended to July 2019.

**18. Has the State fined other communities for not complying with State limits or timelines?
Has the State taken away local control?**

Yes.



Santa Clarita Valley Sanitation District
STATE-MANDATED CHLORIDE (SALT) LIMITS
in THE SANTA CLARITA VALLEY
FREQUENTLY ASKED QUESTIONS

In Lancaster and Palmdale, property owners ended up paying both the costs of upgrading their sewage treatment plants and \$4.5 million dollars in state fines, because they did not act in time to comply with the State's orders.

In the community of Los Osos in San Luis Obispo County, the State took control away from local authorities when property owners and local authorities refused to build a new community sewer system and treatment plant necessary to meet the State's requirements for nitrogen and bacteria. The local Community Services District was fined \$6.6 million, went into bankruptcy and state legislation was passed that took authority for the project away from the local district.

19. How will the compliance project be funded?

All costs for construction and operation of new facilities will be paid by the SCV Sanitation District. The capital costs will require a long-term financing program using a combination of bond funds and/or low-interest State loans. Revenue will be collected by SCV Sanitation District through its service charge program. The service charge is collected annually on the property tax bill as the simplest and most cost effective means of collection. The service charge is based on the type and size of improvement on a parcel; for example, single family homes, apartments, and commercial establishments. Properties that produce a larger amount of wastewater, such as restaurants or Laundromats, are charged more per square foot than are low use properties such as warehouses or office buildings.

A separate Connection Fee is charged to new users or existing users that increase their use of the sewer system. This fee is paid as part of the process to get a building permit. The Connection Fee is based on the cost of the existing SCV Sanitation District facilities used by the new users. Essentially new users must "buy in" to use the existing system paid for by the existing users. Connection Fee revenue is held in a separate account and can only be used to pay for the expansions of existing facilities. The Connection Fee is designed so that existing users do not have to pay to provide facilities for new users.