



# Just Cause / Interim Variance Request due to Coastal/Aliso Canyon Fire

Betty Burnett, South Orange County  
Wastewater Authority General Manager

Fire began ~2:39pm May 11, 2022

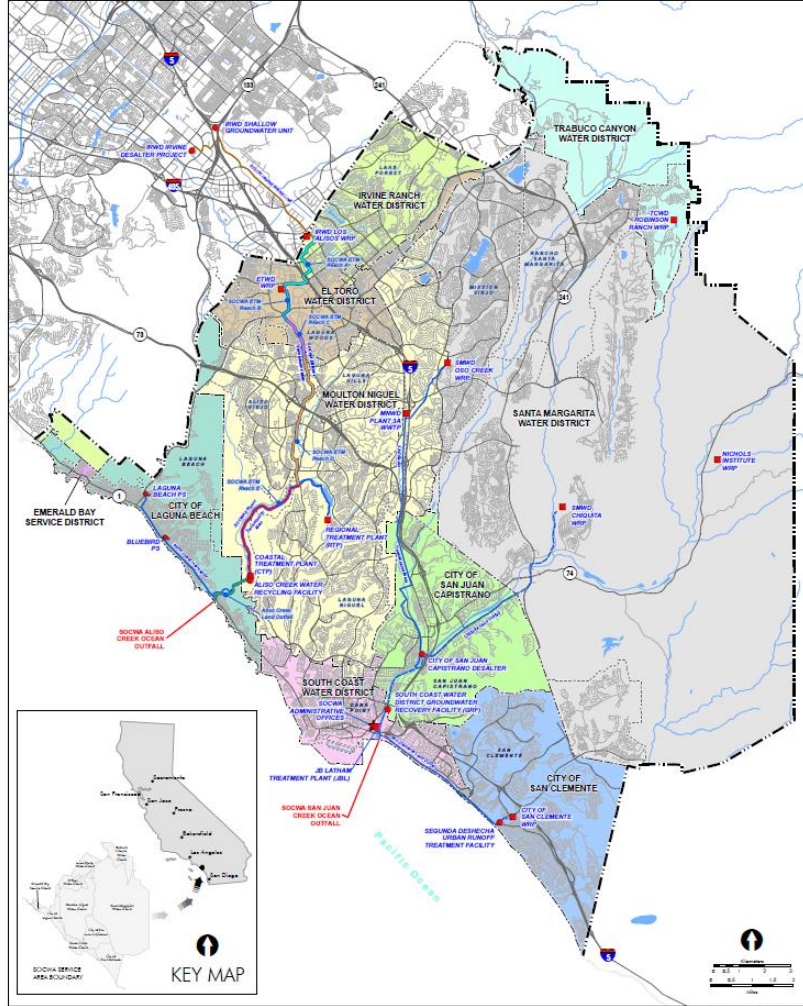


## SOCWA's Mission

- **South Orange County Wastewater Authority's mission is to collect, treat, beneficially reuse and dispose of wastewater in a manner that protects and respects the environment, maintains the public's health, and meets local, state and federal regulations.**



## SOCWA SERVICE AREA MAP



**Member Agencies**

- City of Laguna Beach
- City of San Clemente
- City of San Juan Capistrano
- El Toro Water District
- Emerald Bay Service District
- Irvine Ranch Water District
- Moulton Niguel Water District
- Santa Margarita Water District
- South Coast Water District
- Trabuco Canyon Water District

**Facilities**

- SOCWA Administrative Offices
- Desalter/Treatment Facility
- Pump Station
- Treatment Facility
- Transmission Line
- South Irvine Brine Line
- Land Outfall
- Ocean Outfall

**SOCWA Effluent Transmission Line**

- ETL - Reach A
- ETL - Reach B
- ETL - Reach C
- ETL - Reach D
- ETL - Reach E
- Aliso Creek Land Outfall

**SOCWA Boundary Line**

- City Boundary
- Member Agency Boundary
- Waterbody
- Creek/Stream



## South Orange County Wastewater Authority (SOCWA)

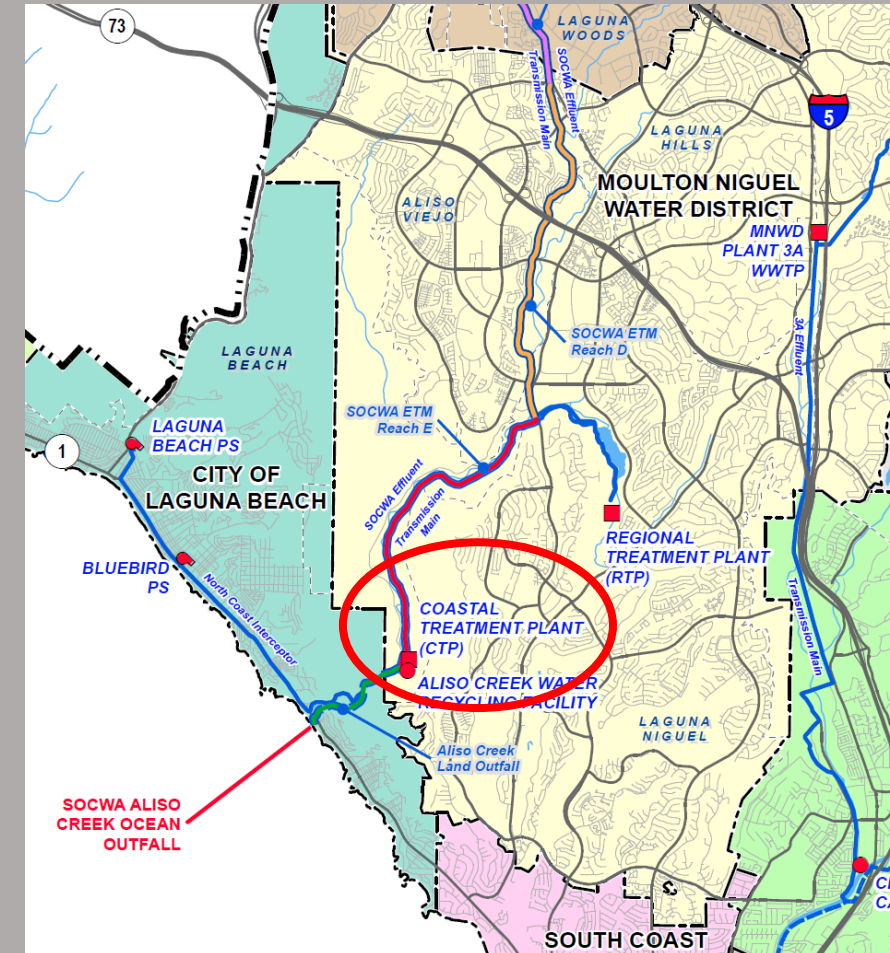
### 10 Member Joint Powers Authority

SOCWA operates 3 wastewater  
treatment facilities and 2  
Ocean Outfalls.

The Coastal Treatment Plant  
(CTP) is one of the three  
wastewater treatment facilities  
circled to the right.

CTP is located at the southwest  
edge adjacent to Aliso Woods  
Canyon Wilderness Park.

CTP has been fire hardened  
through consultant and  
regulatory oversight.



# CTP Facts

- Plant is an essential public service.
- Provides wastewater treatment within State and Federal Standards.
- Plant produces recycled water to offset imported potable demand.
- Site fire-hardened 2018-2022 following recommendations of consultant and Orange County Fire Authority.

## Coastal Treatment Plant



- Location: Laguna Beach
- Total Capacity: 6.7 million gallons per day
- Average Capacity Used Today: 2.9 million gallons per day
- Year Built: 1983
- Recycled Water Production: Up to 1.5 million gallons per day

*Interesting Fact:* The Coastal Treatment Plant shares a boundary with the County of Orange Aliso & Wood Canyon Wilderness Park. SOCWA has a responsibility to guard this natural environment and is taking steps to ensure SOCWA's co-existence near the park is protective of the natural environment.

### *Treatment Processes*

- Screening
- Grit removal
- Primary clarification
- Secondary treatment
- Secondary clarification
- Anaerobic digestion
- Thickening

# Cause for ExParte Emergency Variance

- Essential Public Service - Wastewater Treatment Plant serving City of Laguna Beach, City of Dana Point, within South Coast Water District Service Area and Community of Emerald Bay.
- Coastal Treatment Plant, AQMD Facility ID14833, Permit M27820 emergency generator with 200-hour run limit including 20 maintenance hours.
- Emergency Generator triggered by SCE power outage at approx. 2:39 p.m. on May 11, 2022, automatic start called the attention of the Plant staff to fire in the area on hills nearby to the plant.
- Emergency Generator ran continuously until May 14, 2022, when SCE delivered and started their truck mounted generator. Permanent power not yet restored. SCE truck mounted generator requires frequent fuel delivery.
- Run time on SOCWA Emergency Generator total is 67.9 hours YTD with 3 of 20 maintenance hours utilized.
- SOCWA not out of compliance with Permit M27820 at this time.

# SOCWA Communication to SCAQMD

- May 12, 2022, email to Kristina Gonzales, AQMD Inspector III re: fire in the area of plant and operational reliance on emergency generator was reported
- May 13, 2022, filed ExParte Emergency Variance to comply with SCAQMD Rules 1470 and 203(b)
- May 13, 2022, ExParte Emergency Conditions Received
- May 17, 2022, ExParte Minute Order Received
- June 8, 2022, Response to ExParte Emerg. Conditions
- June 9, 2022 Interim Variance Hearing
- June 30, 2022 Regular Variance Hearing is set

# SOCWA Communication with SCE

- SCE has not yet provided a date for return to permanent power. Initial estimate 7-60+ days.
- SCE has said it is working with State Representatives, the County and PUC to restore pole power to the area.
- SCE has said installation will be first a temporary pole with a later permanent pole install. Pole installation may require need for SOCWA generator to run.
- SCE discussed replacing current truck mounted generator that has frequent refueling requirements with a larger unit, but did withdraw that offer, see Brian Falconer email of June 3, 2022.
- SOCWA emergency generator remains line of defense to a loss of SCE temporary power going out or not refueling on time, see City of Laguna Beach email to SCE of June 8, 2022, re: concern to restore permanent power and “redundancy of paramount importance.”



# Interim Variance Request (up to 90 days)

- **Lack of Reliable Grid Power – SOCWA likely to violate Permit by Using Generator beyond 200 hours:**
  - Fire fighting crews occupied plant site from May 11 through May 19. Concerns with high fire danger area throughout the summer and fall.
  - Without power, CTP plant will spill raw sewage to Aliso Creek within two hours. Therefore, emergency generator would be utilized.
  - SCE has indicated it will not restore power without visual line inspections and that lengthens time needed to return to grid power even once it is restored, See emails Oct 2020 and Oct 2021.
  - Prior power outages take up to 15 hours to restore power. Power will not be restored during high wind events. Each year greater number of events. Example, 2020 experienced 61 hours of power outages.
  - CTP Generator is necessary back-up to SCE generator until grid restored.
  - Once grid power is restored SOCWA will need 60 days to validate that plant/grid will regain normal condition due to uncertainty of supply.
  - SOCWA will need annual maintenance on CTP emergency generator within 30 days after normalize SCE service.



# Interim Variance Request (up to 90 days)

- **Immediate Compliance – an unreasonable burden for essential service:**
  - Community and Regulatory Agencies expect SOCWA to take steps to ensure uninterrupted essential public services 24/7/365.
  - Lack of reliable source of permanent power creates an unreasonable burden due to likely events of more SCE down time (see prior slide).
  - SOCWA took immediate steps to inform and work with AQMD.
- **Lack of Corresponding benefit from reduction in contaminants:**
  - Plant air pollution control equipment (scrubber relies on power and functions to reduce hydrogen sulfides, volatile organics, polycyclic aromatic hydrocarbons, etc.)
- **Consideration to curtail operations / reduce emissions:**
  - Operation of the Emergency Generator will supply power to major plant equipment, but Advanced Water Treatment and Salt Removal would not operate thereby reducing power usage.

# Interim Variance Request (up to 90 days)

- **Data Compliance:**

- SOCWA utilizes hours of operations information from daily logs.
- SOCWA has available data to quantify emissions.
- Annual maintenance will provide confirming tests to quantify emissions.
- Will be completed during period of variance.

- **Additional Information:**

- Previous use of generator within permit limits (for maintenance of emergency back-up power).
- 67.9 hours of operations to date equates to 576 pounds of NO<sub>x</sub>, out of currently permitted total NO<sub>x</sub> of 4,240 pounds. Consumption of fuel 1363 gallons @\$4.92 per gallon of diesel equaling \$6,700.
- Generator is Caterpillar D399 750 kW. Normal plant load is 262 kW; 35% generator load. At full load emissions are approx. 16 pounds per hour with normal kW producing 6 pounds of NO<sub>x</sub> per hour. Peak kW use is 300 kW.
- Cost of grid service to Plant is \$828 per day; Cost of generator use at plant is \$2,370 per day.

**THANK YOU!**

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