



## SOUTH SAN LUIS OBISPO COUNTY SANITATION DISTRICT

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August 21, 2009

Central Coast Regional Water Quality Control Board  
Attn: Ms. Sorrel Marks  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

Re: NPDES No. CA0048003, Order No. R3-2009-0046

Dear Ms. Marks,

Enclosed are South San Luis Obispo County Sanitation District's (District) comments regarding the draft Waste Discharge Requirements (WDRs) for the District's Wastewater Treatment Facility, Order No. R3-2009-0046, NPDES No. CA0048003. The District's comments are organized by page number and section.

### Order Notification, Page 1, Table 3:

The District request that the date on which the Order shall become effective be changed from the date that the Order is adopted to give the District time to implement the new monitoring and reporting requirements. The District requests an implementation date of January 1, 2010.

### Section II: Findings

- ✓ II.A, Page 4: "City's Wastewater Treatment Facility" should read "District's Wastewater Treatment Facility."
- ✓ V.A.10, Page 16: "The concentration of substances set forth in Chapter IV, Table B of the Ocean Plan..." should be changed to reflect the correct chapter "The concentration of substances set forth in Chapter II, Table B of the Ocean Plan..."

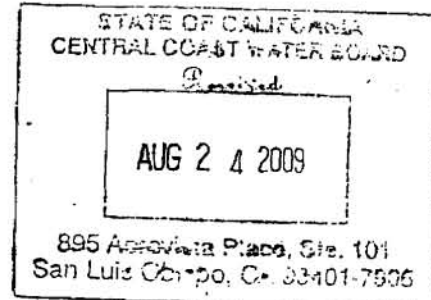
### Section III: Discharge Prohibitions

- ✓ III.G, Page 9: The District requests that this prohibition be re-worded to clarify that the discharge of brine waste is an exception from this prohibition.

### Section IV: Effluent Limitations and Discharge Specifications

- ✓ IV.A.1 Table 7, Page 9: Effluent Limitations for Conventional Pollutants, in the row describing the effluent limit for Fecal Coliform Bacteria, the average weekly limit of 200 MPN/100 ml should have a footnote of [1] not [2].
- ✓ IV.A.2 Table 8, Page 10: Effluent Limitations for Toxic Pollutants, the District requests for clarification that the pollutant Chlorine be identified as Total Chlorine Residual.

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Item No. 16  
October 23, 2009 Meeting  
So. SLO Co. Sanitation District  
Attachment 2

✓ IV.A.2 Table 8, Footnote [7], Page 11: LC 50 shall be determined by static or continuous flow bioassay techniques using standard marine test species as specified in Appendix III, Chapter II. The reference to Chapter II should be deleted, as Chapter II, Appendix III does not exist in the 2005 California Ocean Plan. The reference to Chapter II is also deleted in the draft version of the 2009 California Ocean Plan currently out for public comment.

✓ IV.A.2 Table 8, Footnote [8], Page 11: The reference to Appendix II of the 2005 California Ocean Plan is incorrect and should be changed to Appendix III.

✓ IV.A.2 Table 10, Footnote [6], Page 15: TCDD equivalent calculations table, the first isomer listed should be 2, 3, 7, 8- tetra CDD (not 3,7,8 -tetra CDD): [Note: the TCDD listing of isomers is correct on Page A-5]

#### **Section V: Receiving Water Limitations**

✓ V.A.10, Page 16: The reference to Chapter IV, Table B of the 2005 California Ocean Plan is incorrect and should be changed to Chapter II, Table B.

#### **Section VI: Provisions**

(2) ✓ VI.C.2.a, Page 18: In the first sentence concerning "Toxicity Reduction Requirements," the statement is made "If the discharge consistently exceeds an effluent limitation for toxicity...." The District requests that this requirement be clarified by stating how many toxicity results exceed limitations before a Toxicity Reduction Evaluation is required to be implemented.

✓ VI.C.5.b.(3), Page 22: The reference to 40 CFR 403.9<sup>B</sup> should be cited as 40 CFR 403.9(b).

#### **Attachment A – Definitions**

✓ Page A-2: For the definition of Chronic Toxicity, the reference to Appendix II should be changed to Appendix III of the 2005 California Ocean Plan.

#### **Attachment D-1 – Central Coast Water Board Standard Provisions (January 1985)**

(3) ✓ I.A.5, Page D-10: The District requests that a statement clarifying that the business discharging brine at the WWTP outfall are not considered to be "indirect dischargers" subject to these prohibitions.

✓ I.E.8, Page D-15 and Attachment E, IX.B.5.d: These sections contain the requirement to submit an Annual Report and an Annual Self Monitoring Report respectively. The District requests that these reports be combined into one Annual Report.

#### **Attachment E – Monitoring and Reporting Program**

#### **Section IV: Effluent Monitoring Requirements**

(4) ✓ IV.A.1, Table E-3 "Effluent Monitoring at EFF-001," Page E-5: The District requests that the sampling frequency for Cyanide, Bis(2-ethylhexyl)phthalate, and TCDD Equivalents remain an annual analysis.

The District verified the RPA analysis for these pollutants resulted in an Endpoint 1 and that "reasonable potential" is demonstrated for these Table B pollutants. However, the requirement for effluent monitoring, as stated in the definition of Endpoint 1 is, "to be consistent with the monitoring frequency contained in Appendix III of the 2005 Ocean Plan."

Appendix III of the 2005 Ocean Plan states under the section headed "Compliance with Table B Objectives" that "For discharges between 1 and 10 MGD, the monitoring frequency shall be at least one complete scan of the Table B substances annually."

The District believes that the value of compliance assessment data will be maintained by monitoring for these pollutants on an annual basis, particularly as these pollutants did not violate effluent limitations during the past five years.

- ✓ V.B, Page E-7: As the District determined during the last NPDES permit cycle that the most sensitive species in the determination of Chronic Toxicity is Giant Kelp – germ tube length, the District requests that the screening period to measure Chronic Toxicity against a fish and an invertebrate for three tests be eliminated.

#### **Section VII: Receiving Water Monitoring Requirements – Surface Water and Groundwater**

A, Page E-9: The District requests that in this description regarding Receiving Water Monitoring that the following statement, which is made later in the permit on page F-22 under VI.D.1, of Attachment F, be made for clarification: "The following shoreline monitoring water and shellfish bacterial monitoring has been conditionally waived by the Executive Officer."

⑤ Additionally, the District would like to request additional guidance regarding the statement that "The following receiving water monitoring shall be performed if operational changes, plant upsets, or effluent violations occur."

#### **Section VIII: Other Monitoring Requirements**

- ✓ VIII.A, Table E-8 "Biosolids Monitoring Requirements," Page E-12: Sampling frequency for documenting and reporting "Quantity" and "Location of Disposal" states "During Renewal." This appears to be a typographical error. The District believes this should read "During Removal"
- ✓ VIII.B, Page E-13: The District requests that the last two sentences in this paragraph be changed to reflect the biosolids collection and drying process at the WWTP. The two sentences to be replaced are:

"Biosolids shall be sampled during the same 24-hour period and analyzed for the same pollutants as the influent and effluent sampling and analysis. Biosolids analyzed shall be a composite sample of a minimum of twelve discrete samples taken at equal time intervals over the 24-hour period."

As the second paragraph in this section is reflective of the sampling process used (samples shall be composited from twelve discrete locations) the District requests that the above two sentences be replaced with the statement:

"Biosolids shall be sampled and analyzed for the same pollutants as the influent and effluent samples."

**Attachment F – Facts**

**Section II: Facility Description**

- ✓II.A, Page F-4: The District requests that the sentence in the third paragraph describing the operation of the fixed film reactor be changed to read: "This situation has been addressed by altering (slowing) the speed of the wastewater distributor arm above the reactor media as needed."
- ✓II.E, Page F-6: This section, entitled "Planned Changes" states that "There are no significant operational or physical changes anticipated during the term of the Order for the wastewater treatment plant." The District requests that the following information be included in the Permit:

**E. Planned Changes:**

*Addition of a second Secondary Clarifier (87-foot diameter, 10-feet below grade) and an Aeration Tank (124-foot by 40-foot dual basin, 18 feet deep) is planned during the timeframe of this permit. These additions to the secondary treatment process will improve the WWTP's ability to handle the anticipated increased strength (Biochemical Oxygen Demand and Total Suspended Solids) of wastewater due water conservation efforts by the Member Agencies. These changes will also provide redundancy in the secondary equivalent biological treatment process in the event of an emergency shutdown, mechanical failure, or routine maintenance.*

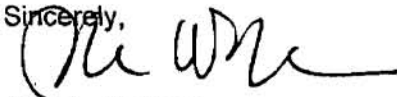
- ✓II.C.3, Page F-13: The internet link to the Reasonable Potential Analysis (RPA) Calculator is incorrect. The District recommends that this statement be re-worded to state that the RPA calculator is available on the State Water Resources Control website.

**Section IV: Rationale for Discharge Limitations and Discharge Specifications**

- ✓IV.C.5, Page F-19: There appears to be a typographical error in the sentence, "When monitoring measures WET in the effluent above the limitations established by the Order, the Discharger must resample, of the discharge is continuing, and retest." The District believes this is meant to read "if the discharge is continuing, and retest."

Thank you for your consideration of the above comments. If you have any questions, please contact Heather Billing on my staff at (805) 544-4011 or e-mail her at [HeatherB@WallaceGroup.us](mailto:HeatherB@WallaceGroup.us).

Sincerely,



John L. Wallace  
District Administrator