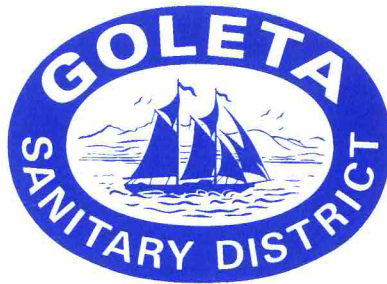


GOVERNING BOARD

JOHN S. CARTER, PRESIDENT
STEVEN T. MAJOEWSKY
GEORGE W. EMERSON
JERRY D. SMITH
JOHN R. FOX



A PUBLIC AGENCY
www.goletasanitary.org

GENERAL MANAGER/
DISTRICT ENGINEER

KAMIL S. AZOURY, P.E.

March 22, 2010

Via E-mail and U.S. Mail

Elizabeth Sablad
U.S. Environmental Protection Agency, Region IX
NPDES Permits Office (WTR-5)
75 Hawthorne Street
San Francisco, CA 94105

Executive Officer
California Regional Water Quality Control Board,
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Subject: Comments to Goleta Sanitary District's Draft Waste Discharge Requirements Order No. R3-2010-0012, NPDES Permit No. CA0048160, Monitoring and Reporting Program and USEPA's 301(h) Tentative Decision Document

Dear Ms. Sablad and Mr. Briggs:

The Goleta Sanitary District (GSD) has reviewed and submits the following comments to the draft Waste Discharge Requirements (WDR) Order No. R3-2010-0012, NPDES Permit No. CA0048160, the associated Monitoring and Reporting Program (MRP) and the USEPA's TDD for the discharge from GSD's wastewater treatment plant.

These comments consist of two parts. Part 1 contains comments on the RWQCB draft order and waste discharge requirements. Part 2 are the comments on the USEPA's tentative decision document.

PART 1

Findings

1. **Page 6. A. Background.** Order No. should be corrected from: R3-2004-00129 to: R3-2004-0129
2. **Page 14. AA. Facility Upgrade.** Update the description of the facility upgrade to reflect changes that have been incorporated into the design. The corrected description should read: *"The proposed upgraded facility will utilize the existing biofilter, and will include construction of a new biofilter identical to the existing, new activated sludge aeration basin and two new secondary clarifiers..."*

Effluent Limitations and Discharge Specifications

3. **Page 22. C. Reclamations Specifications** This section states that the "The Discharger shall comply with Waste Discharge Requirements Order No. 91-03 for reclaimed water production. The Discharger shall comply with applicable state and local requirements regarding the *production and use of reclaimed wastewater* including requirements of California Water Code (CWC) ..."

● Page PAGE 1

Request reference to the use of reclaimed water be removed from the second sentence.

The Goleta Sanitary District, as the producer of reclaimed water, is responsible for the production of reclaimed water under WDR Order No. 91-03. The Goleta Water District, as the primary user of reclaimed water, is responsible for the distribution and use of reclaimed water under Order No 91-04.

Receiving Water Limitations

4. **Page 22. A.1.a.i. 30-Day Geometric Mean** This section requires that “The following standards are based on the geometric mean of the five most recent samples from each receiving water monitoring location.”

Request reference to the five most recent samples be removed from the 30-Day geometric mean limitation.

The monitoring program requires weekly sampling of the surf zone. For most months of the year there would be a maximum of four samples taken during a 30 day period. The 30-day geometric mean in this case would be calculated on the four samples taken during the 30 days.

5. **Page 23. A.1.b.** This section describes the bacteriological standards established by the California Department of Public Health (CDPH).

Request removal of this section.

It is not clear to the Discharger the reason for this section to be included in the discharge specifications. The CDPH has no regulatory authority over the Goleta Sanitary District. All Goleta Sanitary District receiving water limitations and requirements are regulated by the USEPA and the RWQCB.

Provisions – Biosolids Requirements

6. **Page 33. Paragraph ix.** This paragraph states, “There shall be adequate screening at the plant headworks and/or at the biosolids treatment units to ensure that all pieces of metal, plastic, glass, and other inter objects with a *diameter greater than 3/8 inches are removed.*”

Request that the wording be changed to clarify intent of this requirement. The existing headworks bar screens are 3/4 inches which potentially could allow an inert object *greater than 3/8 inches* through the screen. However, please note that as part of the plant upgrade project the existing 3/4 inch headworks bar screens will be replaced with 1/4 inch opening mechanically cleaned screens.

MONITORING AND REPORTING PROGRAM

Whole Effluent Toxicity and Testing Requirements

7. **Page E-9. A. Acute Toxicity Testing** This section discusses the acute toxicity testing program.

Request to have the option of using Topsmelt as the marine test species instead of Silversides (*Menidia beryllina*), as described in paragraph 2 of this section.

Menidia is an east coast species, whereas the Topsmelt was developed by the State of California for testing on California effluents. The Topsmelt is discussed in the EPA manual, see page 239. Menidia may need to be used in some analyses due to the lack of availability of the Topsmelt.

8. **Page E-11 and E-12. B. Chronic Toxicity Testing** This section discusses the chronic toxicity testing program.

Request clarification within this section, due to conflicting requirements.

For example, page E-11 second paragraph requires a minimum of two test species to be used to measure toxicity for a screening period of no fewer than two tests. This same requirement is discussed on page E-12 , second paragraph but requires an initial screening period of no less than three tests.

Reclamation Monitoring Requirements

9. **Page E-14. See comments # 3 above.**

Receiving Water Monitoring Requirements

10. **Page E-15. Surf-Zone Monitoring** The District requested removal of the weekly surf zone sampling requirements. The elimination of this monitoring requirement is based on data collected over the past 15 years which has shown that disinfection of the effluent to kill bacteria and other pathogens is extremely effective. Effluent bacteria data collected after chlorination and dechlorination continue to show low concentrations of coliform and enterococcus bacteria leaving the treatment plant regardless of the season.

On the other hand, bacteria concentrations at surf-zone receiving water stations have been shown to be higher than in the final effluent. This trend is observed year after year. The higher bacteria concentrations are not associated with the treatment plant discharge but typically occur during the rainy winter months and are due to stormwater runoff containing large amounts of bacteria that enter the ocean via the Goleta Slough and flood control channels. No surf zone or ocean exceedences have been attributed to the Goleta Sanitary District's discharge.

Final effluent monitoring has clearly demonstrated the effectiveness of the disinfection process used by GSD. Samples taken from Goleta Slough show consistently high bacteria concentrations throughout the rainy winter months and indicate the true source of the high surf zone bacteria concentrations.

In addition, surf zone bacteria sampling is conducted on a weekly basis at Goleta Beach by the County of Santa Barbara Environmental Health Department. Results of this sampling is reported to the public in the local newspaper and on the Santa Barbara County Public Health Department website. The Environmental Health Department has the authority to close beaches and warn of public of any potential health hazard associated with ocean water contact. The requirement for Goleta Sanitary District to conduct weekly surf zone testing is a duplication of effort and is not required to protect the public health as this is already done by the Environmental Health Department.

The Discharger requests the opportunity to meet with staff to discuss surf zone

sampling results in comparison to the work done by Santa Barbara County and to review the requirements which follows the protocol already adopted by the RWQCB for other local POTWs where shoreline sampling has been tied to the actual effluent total coliform concentrations discharged by the treatment plant.

Request to remove requirement for weekly surf zone monitoring and include a requirement for surf zone sampling based on the concentration of coliform in the final effluent. Suggested wording:

“If three consecutive effluent total coliform bacteria tests exceed 16,000 MPN/100mL, samples shall be collected at surf zone stations A, A1, A2, B, C, D, and E and analyzed for total and fecal coliform and enterococcus organisms once a week. Sampling will continue until the effluent bacteria total coliform concentrations returns to compliance.”

Bioaccumulation Monitoring

11. **Page E-24. C. Chemical Analysis** Table E-11. Bioaccumulation Chemical Analysis has no description of the meaning of superscript #30 on shell Cavity Weight, Condition Factor and Gonadal Index.

Request renumbering and addition of footnote for superscript #30 in Table E-11.

Biosolids Monitoring

12. **Page E-29. Paragraph 7.** This section references Table E-8. Table E-8 deals with nearshore monitoring not biosolids monitoring.

Request clarification to correct testing frequency for biosolids.

Pretreatment Requirements

13. **Page E-33.** No paragraph # 5 is included.

Request this section be reviewed and updated / correct to include all numbered paragraphs.

14. **Page E-34. B. Quarterly reports.** This section is titled quarterly reports, but discussion within the section refers to semi-annual reports.

Request clarification of requirements for report submittal; quarterly or semi-annual. If semi-annual is the second semi-annual report included as part of the annual report?

Attachment F – Fact Sheet

II. Facility Description

15. **Page F-4 A. Description of Wastewater and Biosolids Treatment.** Initial design of upgraded facilities were slightly modified to address CEQA issues.

Request paragraph 2 and 3 be modified to reflect the design changes:

The Discharger has submitted initial design documents for the facility upgrade. The Discharger will upgrade the plant to a full secondary treatment plant by the end of 2014. The proposed upgraded facility will utilize the existing biofilter ~~as a roughing filter~~ and will include a new biofilter, activated sludge aeration basin and two new secondary clarifiers. The facility will be designed to treat all wastewater to secondary effluent standards.

Biosolids are treated in three heated anaerobic digesters. Biosolids from the digesters are discharged into stabilization basins for settling. Once stabilized the biosolids are either sent to drying beds or dewatered through a belt filter press. As part of facility upgrades the Discharger will install one additional anaerobic digester and two dissolved air floatation thickeners construct a new solids handling building to house mechanical thickeners, polymer storage and a screw press to process waste activated sludge.

III. Applicable Plans, Policies, and Regulations

16. Page F-10 Table F-6 Secondary Standards. No values are entered for TSS 30-Day Average and 7-Day average.

Request Table F-6 be completed.

17. Page F-14. Section 7. Paragraph discussion of sediment monitoring states BOD is one of the parameters measured . No BOD is measured on sediment samples.

Request removal of reference to BOD testing.

IV. Rationale for Effluent Limitations and Discharge Specifications

18. Page F-15. A. Discharge Prohibitions Paragraph 3. Discharge Prohibition IIIC. States that "(The average dry weather monthly rate of discharge to the Pacific Ocean shall not exceed 7.64 MGD.) This flow limitation is retained from the previous permit and *reflects the design treatment capacity of the Goleta Sanitary District Wastewater Treatment Facility. The prohibition ensures that the influent flow will not exceed the treatment plant's design capacity.*"

This flow limitation is retained from the previous permit, **but, does not reflect the design treatment capacity of the facility.** The treatment plant design capacity is 9.0 MGD as shown in Table 4. on page 5. The flow limitation of 7.64 MGD was imposed on the Goleta Sanitary District by the Regional Water Quality Control Board when the first 301(h) waiver was granted. It does not reflect the design capacity of the plant.

Request the wording in paragraph 3 on Page F-15 reflect the actual design capacity of the plant and the reason for the 7.64 MGD limitation.

19. Page F-29. Table F-12. Effluent Limitations for the Protection of Marine Aquatic Life. The effluent limitations in this table do not agree with the effluent limitations in Table 10 on Page 17. For example, the 6-month median Arsenic limitation in Table 10 = 618 ug/L while the 6-month median Arsenic limitation in Table F-12 = 0.62 ug/L.

Request that each table be reviewed and correct limitation specified.

PART 2 Technical Decision Document Comments

20. Page 10. Paragraph 3. For completeness, please note that along with the Class A biosolids the Goleta Sanitary District also produces a Class B biosolids. This material is transported off site, further treated by lime stabilization, and land applied.
21. Page 10. Paragraph 4. For completeness, please note that the reclaimed water is distributed by the Goleta Water District for landscape irrigation and dust control. The Goleta Sanitary District produces the water but does not distribute the reclaimed water to the community.
22. Page 17. Paragraph 2. States that, "The applicant met both the monthly average and weekly average requirements or turbidity 100% of the time, *and the instantaneous requirement 99.9% of the time, the difference is due to one exceedence out of more than 1,000 samples.*

The one exceedence of the instantaneous requirement for turbidity is not correct. The Goleta Sanitary District met all of the turbidity requirements 100% of the time.

23. Page 19. Paragraph 1. States that for the biochemical oxygen demand limitation, "The applicant met the *instantaneous maximum requirement 99.9% of the time, the difference is due to one exceedence out of more than 1,000 samples.*

The one exceedence of the instantaneous requirement for biochemical oxygen demand is not correct. The Goleta Sanitary District met all of the biochemical oxygen demand requirements 100% of the time.

24. **Page 24.** The first paragraph under Table 11. States that "Dissolved oxygen concentrations at station WC-ZID are not depressed more than 10% from offshore station concentrations, with the single exception of April 2006."

Please note that the April 2006 receiving water survey was conducted on April 7, 2006 and rainfall records show that a storm passed over the Goleta area beginning on March 31, 2006 and continuing through April 5, 2006. Over four inches of rain fell during this time and indicates the potential effect stormwater run off has on the receiving water environment.

If you have any questions, please do not hesitate to call Jeff Salt of this office or myself.

Very truly yours,

GOLETA SANITARY DISTRICT



Kamil S. Azoury, P.E.
General Manager/District Engineer