Central Valley Regional Water Quality Control Board
9/10 June 2022 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
City of Chico
Chico Water Pollution Control Plant
Butte County

At a public hearing scheduled for 9/10 June 2022, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0079081) (tentative Order) for the City of Chico's Water Pollution Plant. This document contains responses to written comments received from interested persons and parties in response to the tentative Order. Written comments from interested persons and parties were required to be received by the Central Valley Water Board by 9 May 2022 in order to receive full consideration. Comments were received prior to the deadline from:

1. City of Chico (Discharger) (received 6 May 2022)
2. Jo Anne Kipps (Private Citizen) (received 9 May 2022)

Written comments from the above interested person and party are summarized below, followed by the response of Central Valley Water Board staff (Staff).

DISCHARGER (CITY OF CHICO) COMMENTS

DISCHARGER COMMENT #1 – Attachment D-Standard Provisions (Page D-9, D-10)

The Discharger requests removing the second and third paragraphs included with this provision, which summarizes reporting requirements for noncompliance events related to the sanitary sewer system. The City has coverage under General Order 2006-0003-DWQ, and thus, is subject to compliance and reporting requirements of that Order for the City's sanitary system. The tentative Order references the requirement to comply with General Order 2006-0003- DWQ on Page F-11 (Provision III.C.10), which should provide adequate compliance coverage without overlapping reporting requirements. In addition, the discharger request removing language from Page D-10 (Provision V.H).

RESPONSE:
The subject language is standard provision language under 40 C.F.R. section 122.41. No changes proposed.

DISCHARGER COMMENT #2 – Attachment E-Monitoring and Reporting Program (MRP)

a. Effluent Monitoring Requirements:
i. Page E-6 (Table E-3): Please consider modifying the sample type for electrical conductivity monitoring from "24-hour composite" to "grab", consistent with Order R5-2016-0023 (current Order).

RESPONSE:
Grab samples for effluent electrical conductivity monitoring is acceptable for this Facility. Therefore, the tentative Order has been revised and the sample type for effluent electrical conductivity monitoring has been changed from a 24-hour composite sample to a grab sample. The change is reflected in Table E-3 and Table E-11.

b. Receiving Water Monitoring Requirements:
i. Page E-14 (Provision VII.A.2.b): Please consider allowing hand-held analysis of turbidity, dissolved oxygen, and electrical conductivity in lieu of just pH and temperature.

RESPONSE:
A conditional allowance of hand-held meter analysis of turbidity, dissolved oxygen, and electrical conductivity has been added to the Receiving Water Monitoring Requirements in Attachment E, Section VII.A.2.b.

c. Groundwater Monitoring Requirements:
i. Page E-16 (Table E-8): Please consider reducing sampling frequency for groundwater monitoring from "1/Quarter" to "semi-annually", consistent with current monitoring requirements.

RESPONSE:
Quarterly monitoring requirements are necessary to adequately characterize groundwater quality, assess compliance with groundwater limitations, and evaluate potential impacts to groundwater from the Facility. Quarterly monitoring will also allow for evaluation of seasonal

changes in the groundwater. No changes proposed.

d. Effluent and Receiving Water Characterization:
i. Page E-25 (Table E-11/Non-Conventional Parameters): Please consider modifying the sample type for electrical conductivity monitoring from “24-hour composite” to “grab”.

RESPONSE:
The tentative Order has been revised and the sample type for effluent electrical conductivity monitoring has been changed from a 24-hour composite sample to a grab sample (as discussed in the response to Discharger Comment 2.a.). Table E-11 has been updated to reflect the change, accordingly. In addition, please note that Table E-11 Testing Requirements specify that the receiving water sample type is a grab sample, not a 24-hour composite.

DISCHARGER COMMENT #3 – Best Management Practices and Pollution Prevention Specifications

On Page 19 (Provision VI.C.3.a), the discharger requests removal of “sample results reported as DNQ when the effluent limitation is less than MDL” from the first sentence (it is repeated as Provision VI.C.3.a.i).

RESPONSE:
The referenced language is explanatory. No changes proposed.

DISCHARGER COMMENT #4 –Construction, Operation and Maintenance Specifications, Provision VI.C.4.a.v and Provision VI.C.4.a.ix

The Discharger stated, “Provisions are redundant. Please consider removing Provision VI.C.4.a.v or editing it to match Provision VI.C.4.a.ix, consistent with the current Order.

RESPONSE:
To address the redundancy, Provision VI.C.4.a.ix has been removed while Provision VI.C.4.a.v remains.

DISCHARGER COMMENT #5

a. Page D-10 (Provision V.F.2): Paragraphs are redundant. Please consider deleting first paragraph and including standard provisions that are consistent with current Order.

RESPONSE:
Attachment D includes the Federal Standard Provisions from the Statewide NPDES Permit. The language in Attachment D, Standard Provisions, Section V.F.2 is applicable to the Discharger. However, the tentative Order has been revised by removing Provision V.F.3, as it is not necessary for the discharge.

b. Chronic WET Reporting:
ii. Pages E-10 and E-11: Please modify chronic WET reporting schedule to read "annual" in replacement of the current "quarterly" listing, consistent with annual chronic WET testing requirements included on Page E-8.

RESPONSE:
WET testing reporting requirements have been updated accordingly: Attachment E, Provision V.D.1 and V.D.2 have been updated.

c. Effluent and Receiving Water Characterization:
iii. Page E-23 (Table E-11/Inorganics): Delete "asbestos" sampling, consistent with statements on pages E-17 and E-34 that indicate that asbestos sampling is not required.

RESPONSE:
Asbestos effluent monitoring is required as part of the effluent waste characterization study. The Discharger's referenced statements located on page E-17 and E-34 pertain to biosolids and pretreatment monitoring requirements, respectively, and not the effluent waste characterization study. No changes proposed.

d. Technical Report Submittals:
iv. Page E-37 (Table E-13): Table E-13 includes a column header "CIWQS Report Name;" however, the CIWQS report name is presented for Report #1 only and the permit references are presented for the other reports. Please consider revising the column header name or adding a new column for permit references.

RESPONSE:
The column header "CIWQS Report Name" is a standard presentation format in Central Valley NPDES permits. No changes proposed.

v. Page E-37 (Table E-13): Revise reference for Analytical Methods Report from MRP X.D.1 to MRP IX.D.1.

RESPONSE:
Staff has revised the tentative Order for Analytical Methods Report from MRP X.D.1 to MRP IX.D.1.

vi. Page E-37 (Table E-13): Revise reference to "MRP VIII.D.2" for Analytical Methods Report Certification if renumbered per previous comment.

RESPONSE:
The revision is not necessary; no changes proposed.

vii. Pages E-37 and E-38 (Table E-13): Delete all references for "Recycled Water Annual Report Submittal Confirmation" reporting (not applicable).

RESPONSE:
The Facility is subject to the Recycled Water Policy Annual Reporting requirements. Therefore, the references are appropriate. However, The CIWQS Report Name in Table E-13 for the Recycled Water Policy Annual Report Submittal Confirmation has been updated from X.D.3 to IX.D.3.

DISCHARGER COMMENT #6 Attachment F-Fact Sheet

a. Page F-3 (top of page): Revise reference from "section II.B" to "section II.C".

RESPONSE:
The tentative Order has been revised; reference to "Section II.B" has changed to "Section II.C."

b. Page F-17 (Table F-5 Note 1): Revise reference from "section IV.C.3.c" to "section IV.C.3.d".

RESPONSE:
The tentative Order has been revised; reference to "section IV.C.3.c" has changed to "section IV.C.3.d."

c. Page F-82 (Provision VI.B.2.e): Revise reference for Antidegradation Re-evaluation from section VI.C.2.c to section VI.C.2.e.

RESPONSE:
The tentative Order has been revised; reference to section VI.C.2.c has changed to section VI.C.2.e.

d. Page F-90 (Provision VIII.A): Please fill in notification process missing in brackets.

RESPONSE:
The tentative Order has been revised and the notification process has been updated to state, “Notification was provided through internet posting to the Central Valley Water Board’s Website, and direct email to identified interested parties, and posting at the Facility and Chico City Hall.”

DISCHARGER COMMENT #7 Attachment I- Requirements for monitoring Well Installation Workplans and Monitoring Well Installation Reports

a. Pages I-3 and I-4 (Section 2): Requirements are missing for Water Sampling, Soil Sampling (if applicable), Well Completion Report(s), and Appendix. Please consider whether any of these requirements should be restored, consistent with the current permit Order.

RESPONSE:
The tentative Order has been revised and the following language has been added to Attachment I:

F. Water Sampling

- Date(s) of sampling
- Sample identification
- How well was purged
- Analytical methods used
- How many well Volumes purged
- Laboratory analytical data sheets
- Levels of temperature, EC, and pH at stabilization
- Water level elevation(s)
- Sample collection, handling, and preservation methods
- Groundwater contour map

G. H. Soil Sampling (if applicable):

- Date(s) of sampling
- Sample collection, handling and preservation models
- Sample identification
- Analytical methods used
- Laboratory analytical data sheets
- Present soil sampling data in a table

H. Well Completion Report(s) (as defined in California Water Code §13751). Blank forms are available from California Department of Water Resources website www.water.ca.gov. Submit this section under separate cover.

I. Appendix-include, at minimum, copies of the following:

- County-issued well construction permits
- Registered engineer or licensed surveyor's report and field notes
- Field notes from well developer

b. Pages I-3 and I-4 (Section 2.E-F): Revise subsection numbering to 2.D-E.

RESPONSE:
The tentative Order has been revised accordingly; Attachment I, Section 2.E was corrected to Section 2.D. Section 2.F was corrected to Section 2.E.

JO ANNE KIPPS (PRIVATE CITIZEN) COMMENTS

J. KIPPS COMMENT #1
Revise the tentative Order to adequately address the City's land discharges in a manner similar to WDRs for land discharges. This includes characterizing the discharges and their impacts on groundwater, as well as evaluating them on a constituent-by-constituent basis for consistency with the Basin Plan and Antidegradation Policy. Re-circulate the revised tentative permit for public review and comment.

RESPONSE:
The current Order required the Discharger to characterize the groundwater and perform an antidegradation reevaluation. The Discharger's *Final Technical Report – Groundwater Quality Characterization and Antidegradation Reevaluation, April 2020* (Technical Report) provides a summary of two years of quarterly groundwater monitoring data. The Technical Report identified constituents where concentrations demonstrated a potential degradation of groundwater quality as a result of Facility operations or due to other land uses (such as agriculture) surrounding the Facility site or due to legacy impacts associated with historic biosolids drying practices at the Facility. The primary constituents of concern include nitrate (as Nitrogen), total coliform organisms, dissolved iron, and dissolved manganese. The Technical Report also identified deficiencies in the monitoring well network and limited sample sets for analysis.

Although the Technical Report identified groundwater quality impacts, sources of the impacts were inconclusive, monitoring data was limited, and deficiencies in the monitoring well network were identified. Additional data, analysis, and monitoring points are needed to better understand and evaluate the impact the Facility may have on groundwater quality. The tentative Order requires this information to be collected and for the groundwater quality to be reevaluated within 3 years from the effective date of the Order. At this time, it would be inappropriate to make conclusions that would require costly improvements at the Facility based on insufficient and/or inconclusive data. However, due to the existing elevated nitrate conditions in the groundwater, both at the Facility and in the Chico regional area, a land discharge specification for total nitrogen is appropriate for the Facility.

Consistent with this comment and J. Kipps Comment # 10, discussed below, the tentative Order has been revised to include a land discharge specification for total nitrogen of 10 mg/L, as an average monthly limitation. The Discharger cannot immediately comply with the new specification; therefore, a compliance schedule has also been added to the tentative Order to allow time for the Discharger to design and implement needed upgrades. The new compliance schedule is in Section VI.C.7. and discussed in Fact Sheet, Section VI.B.6. In addition, language has been added to the tentative Order under the rationale to support the need for a Groundwater Monitoring Well Network Evaluation (Fact Sheet, Section VI.2.b.) and the Groundwater Quality Characterization and BPTC Analysis (Fact Sheet, Section VI.2.d.). The new language provides background information on the previous groundwater characterization that was presented in the Technical Report.

Consistent with State Water Board Resolution No. 68-16 (State Antidegradation Policy) and then-available information, the current Order included antidegradation findings authorizing limited degradation from wastewater containing constituents such as total dissolved solids, specific conductivity, pathogens, nitrates, organics, metals, and oxygen demanding substances, consistent with the maximum benefit to the people of the state. Additionally, the current Order noted the Facility is designed and constructed to provide secondary level treatment and disinfection and established land discharge specifications consistent with treatment capabilities at the Facility for the protection of designated and anticipated beneficial uses. The current Order found these measures to constitute best practicable treatment or control, consistent with the factors detailed in *Questions and Answers, State Water Resources Control Board Resolution No. 68-16* (Feb. 16, 1995).

The tentative Order does not authorize additional degradation, and as noted above,

includes additional land discharge specifications for total nitrogen to further control the discharge. While the tentative Order continues to require a level of treatment to ensure limited groundwater degradation is not exceeding water quality objectives, the tentative Order further requires the Discharger to submit additional groundwater monitoring and characterization to confirm that Facility operations have not resulted in exceedances of groundwater water quality objectives and to identify additional treatment or control measures where necessary. Section IV.D.4.b of the Fact Sheet has been revised to further clarify this information.

Finally, the revisions detailed in this Response to Comments do not require recirculation. The tentative Order was released for a 30-day public comment period pursuant to 40 C.F.R. section 124.10 and Water Code section 13167.5. The proposed revisions detailed herein are a logical outgrowth of comments received—they are within the scope of the noticed draft and responsive to comments and information received. (State Water Board Order WQ-2013-0101, pp. 10-11; State Water Board Order WQ-2012-0013, pp. 39-40.) Accordingly, recirculation is not required.

J. KIPPS COMMENT #2 – Permitted Discharge Flow.
Identify Plant 2's design treatment capacity, expressed in terms of MGD at ADWF, and revise Discharge Prohibition III.E to prohibit discharges exceeding this flow.

RESPONSE:
In order to acknowledge the temporary reduced capacity of the WWTP, the tentative Order has been revised to prohibit discharges exceeding an average dry weather flow of 8.4 MGD. The Facility description in Attachment F, Fact Sheet, Section II has been updated to reflect the limitation in flow capacity as a result of Plant 1 requiring extensive rehabilitation. Fact Sheet, Table F-1, Facility Permitted Flow and Facility Design Flow have been changed from 12 MGD to 8.4 MGD. A Reopener Provision (Section VI.B.1.j) has been added to the tentative Order to allow for the Order to be reopened to revise the average dry weather flow discharge prohibition from 8.4 MGD upward to the original 12 MGD Facility design if new information demonstrating the Facility is designed and operational to adequately treat average dry weather flows greater than 8.4 MGD. A rationale for the reopener has also been added to the Fact Sheet (Fact Sheet, VI.B.1.h.).

J. KIPPS COMMENT #3 – Land Discharges.
Review the Facility's flow schematic for storm water flows and confer with the City to confirm its current Facility storm water collection, treatment, and disposal practices. As necessary, revise the tentative Order to reflect the Facility's current storm water management operations.

RESPONSE:
Stormwater collected at the Facility headworks area and the sludge storage pad (northern most side of the Facility) is collected through a series of storm drains to Plant Drain Pump Station No. 2, where collected flow is sent to the influent flow junction box and then to the headworks for treatment and disposal under this Order.

Stormwater from the remainder of the Facility is collected through a series of storm drains and catch basins into a gravity collection system and is routed to the Stormwater Pump Station (which originally served as the plant effluent pump station but is now dedicated solely to stormwater). Three pumps are used to lift stormwater to Effluent Box No. 1, where it then flows by gravity to Effluent Junction Box No. 1 and is directed to the southern storage ponds for disposal under this Order. Key infrastructure is in place for collecting/routing any overflow from the digesters, dissolved air flotation thickeners (DAFTs), and the centrifuge all housed on this side of the Facility. All overflows from the solids process area are routed to a main line that sends flow to the sludge drying beds (which ultimately directs leachate back to the treatment process).

The tentative Order has been changed to include the stormwater management system, the additional language has been added to Fact Sheet Section III.C.9. In addition, an updated Liquid Flow Schematic has been added to the Order.

J. KIPPS COMMENT #4 – Sludge Discharges.
Describe the Facility's sludge drying bed containment and confirm whether the beds are equipped with leachate collection. Confirm that the Facility's flow schematic reflects its current and complete operation with respect to sludge and supernatant process flows. Confirm that all sludge digester supernatant is routed back to the primary treatment works. Revise the tentative Order accordingly or at least include this information in the response to comments.

RESPONSE:
The City has provided the following description sludge and supernatant process flow operation:

"*The sludge drying area (approximately 7 acres) includes 38 concrete, self-contained sludge drying beds. Leachate is collected from each bed and is routed to a Sludge Bed Underdrain line that sends flow to Plant Drain Pump Station No. 1 (which is pumped to the primary treatment process).*

Sludge digester supernatant (centrate) is routed back to the secondary treatment works

(see process flow labeled "CENT" on the attached Liquid Flow Schematic). The City completed a project to store centrate flow from the daytime solids dewatering operations in existing Aeration Basin No. 1. This allows the City to bleed the centrate into the secondary system at a slower pace (and during times of reduced energy costs and non-peak influent ammonia loading) overnight. These improvements restrict the plug flow of high ammonia centrate concentrations that previously fed into the aeration basins during the hours set aside for solids dewatering, thus reducing the likelihood of process upset due to overloading. This project was completed in 2017."

The tentative Order has been revised to clarify that sludge digester supernatant is routed back to the secondary treatment works (Fact Sheet, Section II.A.), and a new Flow Schematic that identifies sludge digester supernatant (centrate) process flow has been added to the Order.

J. KIPPS COMMENT #5 – Sludge Discharges.
Revise the tentative Order to prohibit onsite storage of biosolids and other waste solids (e.g., grit) until the City submits certification that its Facility's biosolids and waste solids storage operations comply with section IV.B.1.c,"No waste constituent shall be released, discharged, or placed where it will cause a violation of the Groundwater Limitations of this Order." Include a special provision to identify the work and work products required by this certification.

RESPONSE:
Since October 2018, the Discharger no longer stores or dries sludge or biosolids on-site at the Facility. The drying beds are only used for a short duration during certain Facility maintenance activities.

The tentative Order includes Sludge/Biosolids Treatment or Discharge Specifications that specify the following: "*The treatment of sludge generated at the Facility shall be confined to the Facility property and conducted in a manner that precludes infiltration of waste constituents into soils in a mass or concentration that will violate groundwater limitations in section V.B. of this Order. In addition, the storage of residual sludge, solid waste, and biosolids on Facility property shall be temporary and controlled, and contained in a manner that minimizes leachate formation and precludes infiltration of waste constituents into soils in a mass or concentration that will violate groundwater limitations included in section V.B. of this Order*."

The drying beds are equipment with a liquid underdrain and piping that routes sludge leachate, if any, to the primary treatment works. The tentative Order's Sludge/Biosolids Treatment or Discharge Specifications implement the California Water Code to ensure

sludge/biosolids are properly handled onsite to prevent nuisance, protect public health, and protect groundwater quality. Further, transportation and disposal and reuse of the biosolids is regulated by U.S. EPA under 40 C.F.R. part 503, the tentative Order does not propose to regulate the offsite use or disposal of biosolids.

No changes are proposed to the tentative Order.

J. KIPPS COMMENT #6 – Sludge Discharges.
Revise the tentative Order to prohibit discharges of sludge and other solids (e.g., grit) to the sludge drying beds until the City certifies it has rehabilitated the sludge drying bed area in a manner that assures future sludge discharges will comply with section IV.B.1.c. Include a special provision to identify the work and work products required by this certification.

RESPONSE:
The Discharger does not store or dry any sludge or biosolids on-site at the Facility. The drying beds are only used, as necessary, during Facility maintenance. As discussed in Response to J. Kipps Comment #5, the tentative Order contains Sludge/Biosolids Treatment or Discharge Specifications that implement the California Water Code to ensure sludge/biosolids are properly handled onsite to prevent nuisance, protect public health, and protect groundwater quality. A prohibition to prohibit the discharge of sludge and other solids to the sludge drying beds is not necessary for this Facility, as the discharge specification limits the Facility to only temporary storage and the Facility description does not describe sludge handling practices that result in long-term storage of solids onsite. Further, the sludge drying beds are equipped with a liquid underdrain and piping that routes sludge leachate, if any, to the primary treatment works. The underdrain system provides an added layer of protection of seepage to groundwater.

No changes are proposed to the tentative Order.

J. KIPPS COMMENT #7 – M&T Pond and Wetlands Discharges.
Confirm the City's apparent chronic failure to report D-002 flows during the permit period and update, as appropriate, the tentative permit's Compliance Summary (Fact Sheet D) to reflect this violation of monitoring and reporting requirements.

RESPONSE:
The Discharger monitored daily effluent flow to the M&T Pond (LND-001) during the term of the current Order. The Discharger reported flow through the electronic Self-Monitoring Reports (eSMR) module of the California Integrated Water Quality System (CIWQS). However, the flow data may have not been formatted in the CIWQS Data

Format properly. As a result, the monitoring data for daily discharges to the pond is not clearly identifiable in the CIWQS database. To remedy the situation, the Discharger has supplied Staff with daily land discharge flow data from 2019, 2020, 2021, and 2022 in a readable format. The files have been uploaded to the Central Valley Water Board's Electronic Content Management (ECM) system, which is accessible to the public. Review of land discharge flow data from January 2021 through February 2022 indicates there was approximately 285 million gallons of effluent discharged to the pond. The Discharger discharged to the pond, on average, seven days per month during this period, with a maximum of 18 days in July 2021 and a minimum of zero during February 2021 and April 2021. The formatting issue related to LND-001 flow data in eSMR uploads to CIWQS will also be addressed upon adoption of the new Order so that the data is viewable to the public in the eSMR module in CIWQS. No changes are proposed to the tentative Order.

J. KIPPS COMMENT #8 – M&T Pond and Wetlands Discharges.
Confirm that the City has installed permanent pond staff gauges as specified in section VI.C.4.a.x. If necessary, request the City to install these gauges and submit certification that it has completed the work.

RESPONSE:
The Discharger has completed the installation of permanent staff gauges in each pond. The staff gauges have calibration marks that show the water level at design capacity and enable determination of available freeboard.

J. KIPPS COMMENT #9 – M&T Pond and Wetlands Discharges.
Revise the tentative Order to include a numerical groundwater limitation of 0.5 mg/L for ammonium (NH4). Support this limitation by applying the translation methods contained in internal and external technical guidance documents.

RESPONSE:
Establishing a numerical groundwater limitation of 0.5 mg/L for ammonium (NH4) is not warranted at this time. Additional groundwater data is needed to better understand background groundwater conditions and to assess the Facility's impact on groundwater. The tentative Order prescribes Groundwater Limitations that protect the beneficial uses of the underlying groundwater. In addition, as discussed in response to J. Kipps Comment # 1, a land discharge specification for total nitrogen has been added to the tentative Order. The specification has been added for the protection of designated and anticipated beneficial uses of groundwater.

J. KIPPS COMMENT #10 – M&T Pond and Wetlands Discharges.

Revise the tentative Order as follows:

a) Revise the tentative permit's Fact Sheet to identify the pond invert elevations of all ponds.
b) Restrict effluent discharges to PND-001 for wetlands maintenance when there is less than five vertical feet distance separating the invert of PND-001 and first encountered groundwater in GW-4.
c) Include a requirement and compliance schedule for equipping PND-001 with a liner that meets a hydraulic conductivity standard comparable to the State's General Winery Order (1x10-6 cm/sec).
d) Prescribe for D-002 a new effluent limitation of 10 mg/L total nitrogen to reduce the discharge's organic and nitrogen loading to soil and groundwater. Include special provision describing the work and work products associated with this requirement, along with a compliance schedule.

RESPONSE:

Lining the pond is not necessary because the tentative Order includes Land Discharge Specifications and Construction, Operation, and Maintenance Specifications for the disposal ponds that address groundwater protection.

Additionally, staff has amended section IV.B.1.a of the tentative Order to include a Land Discharge Specification at Discharge Point D-002 (LND-001) of 10 mg/L total nitrogen (average monthly limit) to reduce the discharge's organic and nitrogen loading to soil and groundwater. The Discharger cannot immediately meet this new discharge specification; therefore, a compliance schedule has been included in Section VI.C.7 of the tentative Order to require the Discharger to come into compliance with the new requirement and provide time for necessary upgrades. The compliance schedule is consistent with the Discharger's projected timeframe for implementing nitrogen reducing measures at the Facility. A rationale for the compliance schedule has been added to the Fact Sheet (Section VI.B.6.) and Finding II.D of the tentative Order has been updated to reflect state law provisions applicable to land discharge and related groundwater protection requirements.

The tentative Order has been updated with language to support the total nitrogen specification. Updated language is provided in Attachment F, Fact Sheet, Section IV.F, Land Discharge Specifications.

In addition, the tentative Order has been updated to specify that the required Groundwater Quality Characterization study include an evaluation of the

unsaturated soil thickness between the bottom of the ponds and highest groundwater.

J. KIPPS COMMENT #11 – M&T Pond and Wetlands Discharges.

To adequately characterize the discharge to the M&T Pond and wetlands and its impact on groundwater, as well as to assess the effectiveness of the City's salinity control measures, revise the MRP as follows:

a) Add to Land Discharge Monitoring Requirements for D-002:
   i) Weekly monitoring for EC and nitrogen compounds (nitrate-nitrogen, ammonia, Total Kjeldahl Nitrogen).
   ii) Monthly monitoring for TDS and FDS.
   iii) Monthly monitoring for Trihalomethanes (THMs) because the City uses chlorine for disinfection and therefore there is reasonable potential for disinfected effluent to contain THMs in concentrations exceeding the MCLs.
   iv) Semi-annual monitoring for Standard Minerals.

RESPONSE:

The following additional monitoring requirements have been added to the Land Discharge Monitoring (D-002): Electrical Conductivity (weekly) and Total Nitrogen (weekly), Total Dissolved Solids (monthly), and Standard Minerals (once per year). The rationale for the land discharge monitoring requirements have been updated to reflect the additional monitoring parameters (Fact Sheet, page 92, Section VII.E.4.).

b) Add to the suite of constituents monitoring quarterly in compliance and background wells:
   i) Total Organic Carbon
   ii) Dissolved iron, dissolved manganese, and dissolved arsenic
   iii) Hardness and alkalinity
   iv) THMs

RESPONSE:

The following additional parameters have been added to the Groundwater Monitoring Requirements in Table E-8: Total organic carbon, dissolved iron, dissolved manganese, dissolved arsenic, hardness, alkalinity, and trihalomethanes. These parameters are to be monitored at a quarterly frequency. The rationale for the groundwater monitoring requirements has been updated to reflect the additional monitoring parameters (Fact Sheet, Section VII.D.2.).

c) Reinstate the current Order's monitoring of the City's supply water. The current permit justified this as required "to evaluate the source of constituents in the wastewater." This data is essential for assessing the City's salinity control efforts.

RESPONSE:
Municipal water supply monitoring is no longer necessary for the Facility based on data collected during the term of the current Order. Further, the Discharger submitted a Notice of Intent for the Salt Control Program indicating its intent to meet the Alternative Salinity Permitting Approach. Under the Alternative Permitting Approach, the Basin Plan requires dischargers to implement salinity minimization measures to maintain existing salinity levels and participate in the Prioritization and Optimization (P&O) Study to provide information for subsequent phases of the Salt Control Program. No changes proposed.

J. KIPPS COMMENT #12 – General Comments.
Revise the tentative permit further as follows:

a) For consistency between permits, arrange groundwater limitations in the same order as the current Order.

RESPONSE:
The proposed change is not necessary; therefore, no changes proposed.

b) Provide context in the Fact Sheet for section VI.C.1.i. regarding the City's past discharge to the M&T Irrigation Canal, in a manner similar to the current Order.

RESPONSE:
The following language has been added to the rationale for the M&T Irrigation Canal Outfall Reopener Provision (Fact Sheet, Section VI.B.1.f.): "*The M&T Irrigation Canal Outfall has served as a historic, but inactive, discharge location for the Facility. Discharges to this outfall have not occurred in the past 35 years and information necessary to establish appropriate waste discharge requirements is not available*."

c) Revise Table F-2, Historic Effluent Limitations, to

i) Identify the time period associated with the "representative data," similar to the current Order.

RESPONSE:
The Fact Sheet, page 8, Section II.C. has been updated to provide the following date range for the data provided in Table F-2: 1 January 2018 – 1 January 2021. Further, a reference to "Discharge Point 003," has been corrected to "Discharge Point 001," in Fact Sheet Section II.C.

ii) Delete MDEL 90 for BOD and TSS as the current permit does prescribe these.

RESPONSE:
The current Order prescribes a maximum daily effluent limitation of 90 mg/L for both BOD and TSS. Table F-2 in the tentative Order includes the MDEL limit for BOD and TSS because the table provides the historic effluent limitations (limitations prescribed by the current Order). Therefore, it is appropriate that the MDEL of 90 mg/L for BOD and TSS remain in Table F-2. No changes are proposed to the tentative Order.

d) Correct the units for nitrate plus nitrite in the Fact Sheet, Page 7, section (c).

RESPONSE:
The units for nitrate plus nitrite in the Fact Sheet, Page 7, section (c) are correct. However, incorrect units for nitrate plus nitrite were identified in Fact Sheet, page F-64, Section IV.C.3.d.vii (c). As a result, the tentative Order has been revised to have the correct units.

e) Combine sections B.2.a-b of the MRP for pond monitoring, as they are similar.

RESPONSE:
Attachment E, Monitoring and Reporting Program, Section VI.B.2 remains unchanged; Section VI.B.2.a. pertains to odor control and Section VI.B.2.b. pertains to weed control. No changes are proposed to the tentative Order.