

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 Redding
Clear Creek Wastewater Treatment Plant
Shasta 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. CA0079731) for the City of Redding's Clear Creek Wastewater Treatment 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 1 May 2022 in order to receive full consideration. Comments were received prior to the deadline from:

1. City of Redding (Discharger) (received 8 April 2022)

Written comments from the above party are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER (CITY OF REDDING) COMMENTS

DISCHARGER COMMENT #1 – Incomplete reference to a table within Attachment E

The Discharger identified an incomplete reference to a table within Attachment E. On page E-31 of the tentative order it states, “the Recycled Water Policy Annual Report shall be uploaded into CIWQS annually as a technical report per Table E-XX”.

RESPONSE:

Central Valley Water Board staff agrees and has amended the tentative order to state, “the Recycled Water Policy Annual Report shall be uploaded into CIWQS annually as a technical report per Table E-12”.

DISCHARGER COMMENT #2 – Unable to located Table F-6

After reviewing the tentative order, the Discharger was unable to locate Table F-6 within the Attachment F.

RESPONSE:

Central Valley Water Board staff were able to locate Table F-6 on page F-26 of Attachment F. Therefore, no changes will be made to the tentative order.

DISCHARGER COMMENT #3 – Incorrect Chronic Toxicity Monitoring frequency

The Discharger identified a chronic toxicity monitoring inconsistency within the tentative order. Page F-91 of Attachment states, “Monthly chronic whole effluent toxicity testing is required in order to demonstrate compliance with the Basin Plan’s narrative toxicity objective” while page E-9 of attachment E states, “The Discharger shall perform routine twice per year chronic toxicity testing”.

RESPONSE:

Central Valley Water Board staff agrees and has amended the tentative order to state, “Twice per year chronic whole effluent toxicity testing is required in order to demonstrate compliance with the Basin Plan’s narrative toxicity objective”.

DISCHARGER COMMENT #4 –Questions regarding the Recycled Water Policy

The Discharger stated, “Recycled water is used within the plant to mix with disinfection chemical prior to injection, for foam and odor control, and washing down equipment; does this water qualify as discharge or distributed recycled water as outlined in sections 3.2.3 or 3.2.4 of the Recycled Water Policy?”

RESPONSE:

Section 3.2.3. of the Recycled Water Policy states,

“*Discharge*. Monthly volume of treated wastewater discharged to each of the following, specifying level of treatment:

- Inland surface waters, specifying volume required to maintain minimum instream flow.
- Enclosed bays, estuaries and coastal lagoons, and ocean waters.
- Natural systems, such as wetlands, wildlife habitats, and duck clubs, where augmentation or restoration has occurred, and that are not part of a wastewater treatment plant or water recycling water treatment plant.
- Underground injection wells, such as those classified by U.S. EPA’s Underground Injection Control Program, excluding groundwater recharge via subsurface application intended to reduce seawater intrusion into a coastal aquifer with a seawater interface.
- Land, where beneficial use is not taking place, including evaporation or percolation ponds, overland flow, or spray irrigation disposal, excluding pasture or fields with harvested crops.”

Since the Discharger does not discharge recycled water in any of the ways mentioned above, section 3.2.3 does not apply to them.

Section 3.2.4.2 of the Recycled Water Policy states,

“Annual volume of treated wastewater distributed for beneficial use in compliance with California Code of Regulations, title 22 in each of the use categories listed below.”

The recycled water used at the Facility to mix with disinfection chemical prior to injection, for foam and odor control, and washing down equipment is not subject to title 22 standards; section 3.2.4 does not apply to them.