

Non-substantive Comments on Tentative Order Issued for the Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment and Reclamation Facility (Order No. R1-2019-0007)

1. Agency’s Facility address is: 800 Aviation Boulevard, Santa Rosa, CA 95403. Therefore, following changes need to be made:

Table 1. Discharger Information [Page 1]

Facility Address	2025 800 Aviation Boulevard Santa Rosa, CA 95403
-------------------------	----------------------------------------------------------------

Table 3. Facility Information [Page 3]

Facility Address	2025 800 Aviation Boulevard Santa Rosa, CA 95403 Sonoma County
-------------------------	-------------------------------------------------------------------------------------

2. Tertiary treated municipal wastewater is utilized for recycled water use. Therefore, we propose the following changes to acknowledge this use:

Table 2. Discharger Locations [Page 1]

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Discharge Location
002	Tertiary Treated Wastewater	38°31’0.18” N	122°8’10.77” W	Tertiary Effluent <u>Recycled Water</u> Storage Pond at WWTF
003	Tertiary Treated Wastewater	38°30’19.08” N	122°51’3.07” W	Tertiary Effluent <u>Recycled Water</u> Storage Pond at Reservoir D

IV. Effluent Limitations B.1.

1. The Discharger shall maintain compliance with the following effluent limitations for disinfected tertiary recycled water prior to tertiary recycled water storage, with compliance measured at Monitoring Location EFF-002 as described in the Monitoring and Reporting Program. The tertiary treated recycled water shall, at a minimum, be adequately oxidized, microfiltered, and disinfected as defined in Title 22, Division 4, Chapter 3.

3. II. Findings B. Page 4

The Discharger currently has signed agreements with twelve individual recycled water users and currently provides disinfected tertiary recycled water for irrigation capacity of 500 acres of vineyards, ~~200~~ 10 acres of pasture, 5 acres of grass, and 20 acres of nut trees. In addition, the Discharger periodically applies secondary recycled water to 210 acres of grasslands at the Sonoma County Airport.

4. Footnote 4 indicated in Section IV. Effluent Limitations B. 2. a. (Page 10) is missing:

- a. The median concentration shall not exceed an MPN of 2.2 per 100 mL, using the bacteriological results of the last 7 days for which analysis have been completed⁴; and

5. In order to maintain consistency and readability, we propose the following changes:

Page 2; Last paragraph

I, Matthias St. John, Executive Officer, do hereby certify that this Order with all attachments is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, North Coast Region, on April 17 or 18, ~~2018~~ 2019.

III. Discharge Prohibitions K. (Page 8)

The discharge of sludge is prohibited, except as authorized under section VI.A (Solids Disposal and Handling Requirements) of this Order and/or the Discharger's enrollment under Statewide Biosolids Permit. ~~(identified in Provision VIII.B.2.b. of this Order).~~

IV. Effluent Limitations C. 3. a. (Page 11)

As measured ~~at following~~ the end of the secondary chlorine contact basin at Monitoring Location EFF-001, the total residual chlorine concentration shall be maintained at a level that ensures the discharge meets the total coliform effluent limitations at the end of the disinfection process when discharging to ~~the recycled water storage pond~~ discharge to the secondary recycled water storage pond at Discharge Point 001.

IV. Effluent Limitations C. 3. b. i. (Page 11) to be consistent with Title 22

The chlorine disinfection process shall at all times provide a CT value of not less than 450 milligram-minutes per liter (mg-min/L) with a modal contact time of at least 90 minutes, based on peak ~~daily~~ dry weather design flow.

VIII. General Provision (Page 13)

VIII. General Provision F. 1. (Page 15)

~~d. 2.~~ Perform public outreach at least once a year to educate industrial, commercial, and residential users about the importance of preventing discharges of industrial and toxic wastes to the collection system or Facility;

~~e. 3.~~ Perform ongoing inspections and monitoring, as necessary, to ensure adequate source control.

VIII. General Provision J. (Page 17)

Monitoring and Reporting. The Discharger shall comply with the Monitoring and Reporting Program and any modifications to these documents as specified by the Regional Water Board Executive Officer. Chemical, bacteriological, and ~~bioassay~~ analyses shall be conducted at a laboratory certified for such analyses by State Water Board DDW and shall conform to DDW guidelines. The Discharger shall comply with the MRP in Attachment B D of this Order and any future revisions thereto.

VIII. General Provision L. 5. (Page 18)

Any person signing a document under ~~paragraph (a) or (b)~~ paragraphs 1, 2, 3, and 4 of this provision shall make the following certification:

Attachment D. V. Other Monitoring Requirements A. (Page D-3)

Filtration process monitoring shall demonstrate compliance with section IV.C.3.2 (Filtration Process Requirements for Tertiary Treatment System) of this Order and applies to all tertiary treated wastewater flows. The following filtration process monitoring shall be implemented:

Attachment D. V. Other Monitoring Requirements A.2.b (Page D-4)

Compliance. Compliance with the 95th percentile effluent turbidity limitation specified in title 22, as referenced in section IV.C.3.b.2.b.i of the Order, shall be determined using the levels of recorded turbidity taken at intervals of no more than 1.2 hours over a 24-hour period. Exceedances of the maximum turbidity requirement referenced in section IV.C.3.b.2.b.ii of this Order shall not be considered a violation of these waste discharge requirements if such exceedance does not exceed a duration of one minute.

Attachment D. V. Other Monitoring Requirements A.2.c (Page D-4)

Reporting. If the filtered effluent turbidity exceeds 0.2 NTU for more than 5 percent of the time in a 24-hour period or 0.5 NTU at any time, the incident shall be reported in the ~~quarterly~~ monthly SMR and to the Regional Water Board and DDW by telephone within 24 hours in accordance with Provision VIII.N of this Order. A written report describing the incident and the actions undertaken in response shall be included in the monthly SMR. Mitigation of the event shall consist of diverting all inadequately treated wastewater to temporary storage or an upstream process or automatically activated chemical addition to comply with title 22 requirements (Sections 60304 and 60307).

Attachment D. V. Other Monitoring Requirements B. (Page D-4)

Tertiary disinfection process monitoring shall demonstrate compliance with section ~~IV.C.4.b~~ IV.C.3.b (Disinfection Process Requirements for Chlorine Disinfection System – Discharge Point 002) of this Order and applies to all tertiary treated wastewater flows. The following disinfection process monitoring requirements must be implemented:

Attachment D. V. Other Monitoring Requirements B. 1. Disinfection Process Monitoring (Monitoring Location ~~EFF-001~~ 002)

Attachment D. V. Other Monitoring Requirements B. 1. c. (Page D-5)

Reporting. If the chlorine disinfection CT is less than 450 mg-min/L or if the chlorination equipment fails, the event shall be reported in the ~~quarterly~~ monthly SMR and the incident shall be reported to the Regional Water Board and DDW by telephone within 24 hours in accordance with Provision VIII.N of the Order. A written report describing the incident and the actions undertaken in response shall be included in the ~~quarterly~~ monthly SMR. The report shall describe the measures taken to bring the discharge into compliance. Upon discovery of any equipment failure or failure to achieve 450 mg-min/L after disinfection, inadequately treated and disinfected wastewater shall be diverted to a temporary storage basin or an upstream process for adequate treatment.

Attachment D. VI. Reporting Requirements C. 1. (Footnote 1; Page D-9)

The contact number of the Regional Water Board during normal business hours is (707) 576-2220. After normal business hours, spill reporting to ~~CalEMA~~ CalOES will satisfy the 24-hour spill reporting requirement for the Regional Water Board. The contact number for spill reporting for the ~~CalEMA~~ CalOES is (800) 852-7550.

6. Following paragraphs' fonts need to be made consistent:

VI. Reporting Requirements A. 3. Table D-5: Table's body text seems to be written in a different font.

VI. Reporting Requirements B. 2. f. i through iv: Font size seems to bigger than normal body text.