Response to Comments
Waste Discharge Requirements
Order No. R1-2024-0006
for
Keysight Technologies
Industrial Manufacturing Wastewater Treatment Facility
WDID No. 1B82005OSON
Sonoma County
April 4, 2024

This Response to Comments document includes the comments received from the commenters, followed by the North Coast Regional Water Quality Control Board (Regional Water Board) staff responses to each comment. Additionally, this Response to Comments document includes a summary of staff-initiated changes made to the Draft Permit. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments received and is being presented to the Regional Water Board for consideration.

The deadline for submittal of public comments regarding draft waste discharge requirements for proposed Order No. R1-2024-0006 (Draft Permit) for Keysight Technologies Fountain Grove Site (Facility) was February 7, 2024. Regional Water Board staff received written comments from the Permittee, Keysight Technologies, during the Draft Permit's notification period.

Regional Water Board staff met virtually and on the phone with the Permittee on January 29, 2024, February 2, 2024, February 7, 2024, and February 22, 2024, to discuss the Draft Permit and proposed changes made in response to comments received. The Permittee did not identify any significant concerns with the Draft Permit's proposed changes discussed during the meetings.

Comments Received from Permitee

Comment No. 1:

Page 4, Sec. II.B. Background and Facility Description, Paragraph 5:

Modify the process wastewater pretreatment description to: “Wastewater from the manufacturing processes is treated to remove contaminants and neutralize the pH prior discharge to either the irrigation system or the sanitary sewer.”

Response to Comment No. 1:

Change No. 4 was made to the Draft Permit in response to this comment.

Comment No. 2:

Page 4, Sec. II.B. Background and Facility Description, Paragraph 6 (Also Page 2, Footnote 1 and Page D-4, Footnote 8):

Add the notation that drip irrigation is being used in addition to spray irrigation.

Response to Comment No. 2:

Changes No. 2, 3, 5, and 11 were made to the Draft Permit in response to this comment.

Comment No. 3:

Page 13, Sec. III.G. Discharge Prohibitions (Also Page D-4, Table G-1 and Sec. III.A. Monitoring Requirements):

For Influent Monitoring Location INF-001, we propose to use the sum of the Metal Finishing Category Effluent (40 CFR Part 433) and the Electrical and Electronic Components Category Effluent (40 CFR Part 469) for the continuous monitoring of the influent to the wastewater pretreatment. There are existing continuous flow meters for the 469 wastewater and for the pretreatment system effluent from the final pH adjustment tank (which is the sum of the 469 and 433 waste streams). We propose to add a new flow meter for the combined 433 waste stream, which is generated in eight separate production processes. This new flow meter would be installed as part of our current wastewater treatment tank replacement project; this installation would be by March 1, 2025. In the meantime the INF-001 would be reported as the pretreatment system effluent, which is continuously monitored; this flow rate is the sum of the 469 and 433 wastewater streams, with the addition of a small amount of pH-neutralizing chemical. A flow diagram is attached that illustrates this proposal.

Response to Comment No. 3:

Change No. 1 was made to the Draft Permit in response to this comment. Regional Water Board staff acknowledge that influent monitoring will be performed as described by the Discharger until March 1, 2025.

Comment No. 4:

Page 13, Sec. III.H. Discharge Prohibitions (Also Page D-4, Sec. III.B. Monitoring Requirements and Page D-5, Table G-3):

Although our historical flow from the Reclaim Storage Tank to the Irrigation System (EFF-001) has been less than the new limit of 0.07 mgd, we plan to install a control system that would automatically divert the reclaimed process wastewater away from the Reclaim Storage Tank to the sanitary sewer when we approach the 0.07 mgd irrigation limit. Due to the logistics of this control system we propose an implementation target date of June 1, 2024.

Response to Comment No. 4:

Change No. 1 was made to the Draft Permit in response to this comment.

Comment No. 5:

Page 14, Sec. IV.A. Effluent Limitations (Also Page D-5, Table G-3):

In order to ensure that the reclaimed water that is sent to the Reclaim Storage Tank meets the pH requirement we need to incorporate the diversion capability noted above for pH as well as for total daily flow. This capability would be in addition to the monitoring and control system already in place for the pH. Due to the logistics of this control system we propose an implementation target date of June 1, 2024.

Response to Comment No. 5:

Change No. 1 was made to the Draft Permit in response to this comment.

Comment No. 6:

Page 22, Sec. V.D. Storage Tanks:

The freeboard requirement is practical for the Reclaim Storage Tank; the level of that tank is currently monitored. The treatment and effluent tanks are primarily operated in a gravity-flow mode with tank levels set by the piping from one to the next; they are also located in secondary containment. The treatment and effluent tanks do not need a freeboard requirement.

Response to Comment No. 6:

Change No. 8 was made to the Draft Permit in response to this comment.

Comment No. 7:

Page 30, Sec. VIII. N. General Provisions:

This industrial pretreatment facility does not meet the definition of Division 7, Chapter 9 of the California Water Code; we have previously received an exemption from the

personnel qualification requirements from the Water Board (2016 confirmation letter is attached). The personnel operating the Keysight industrial wastewater pretreatment plant receive training in the site-specific operating procedures.

Response to Comment No. 7:

Change No. 9 was made to the Draft Permit in response to this comment.

Staff Initiated Changes to Permit

Changes to the Draft Permit were made by Regional Water Board staff in response to the comments received by the Permitee to provide a more concise description of the treatment processes and to ensure consistency in the required provisions of the Proposed Order. Text added to the Draft Permit is identified by underline and text deleted from the Draft Permit is identified by strike-through in this document. Page numbers in parentheses reflect page numbers in the Proposed Order in the Agenda Package. The following are the changes made to the Draft Permit:

Change No. 1: Pg. 2 first paragraph (page 2) has been updated to specify that the effective date of the Order shall be June 1, 2024, as follows:

IT IS HEREBY ORDERED, that Order No. 89-140 is rescinded upon the effective date of this Order except for enforcement purposes, and, in order to meet the provisions contained in division 7 of the Water Code (commencing with section 13000) and regulations adopted thereunder, the Discharger shall comply with the requirements in this Order.

This Order was adopted on: April 4, 2024.
This Order shall become effective on: June 1, 2024.

Change No. 2: Footnote 1 of section I (page 1) has been updated to specify that the existing irrigation facilities include drip irrigation in the distribution system as follows:

[1] Existing permanent spray and drip irrigation distribution system prior to adoption of this Order, as described in Order section II.B.

Change No. 3: Section II.B (page 4) has been updated to specify that the irrigation facilities include drip irrigation in the distribution system as follows:

The irrigation facilities consist of two 75,000 gallon storage tanks and a permanent spray and drip irrigation distribution system.

Change No. 4: Section II.B (page 4) has been updated to include a more concise description of the treatment processes as follows:

The Discharger diverts and stores up to 150,000 gallons per day of treated industrial wastewater for irrigation of approximately 26 acres of landscaped land (irrigation areas) owned by the Discharger and located in the NE 1/4 of Section 2, T7N, R9W,

MDB&M, as identified ~~i~~on Attachment A incorporated herein and made a part of this Order.

Wastewater from the manufacturing processes is treated to remove contaminants and neutralize the pH prior to discharge to either the irrigation system or the sanitary sewer.~~Wastewater is neutralized and then processed through an ion exchange unit to remove the metals. Wastewater streams with higher metals content are processed to precipitate out metals. Supernatant is then neutralized. Rinsewaters with low levels of cyanide are oxidized to cyanate with hypochlorite, then neutralized. The combined waste stream goes through a final neutralization process prior to discharge.~~

Change No. 5: Footnote 6 of section IV.A (page 14) has been updated to specify that the existing irrigation facilities include drip irrigation in the distribution system as follows:

[6] Existing permanent spray and drip irrigation distribution system prior to adoption of this Order, as described in Order section II.B.

Change No. 6: Section V.B.8 (page 20) has been amended as follows:

Kc = Crop growth coefficient ~~for pasture grasses at the North Site~~

Change No. 7: Section V.B.9 (page 20) has been updated to clarify the saturated soils provision as follows:

9. Reclaimed water shall not be applied during periods when soils are saturated. Specifically, reclaimed water application to land is prohibited during the following times:

a. Within 24 hours ~~of~~prior to a forecasted precipitation event with a greater than 50-percent probability of occurring. The dDischarger must obtain the precipitation forecast information from the National Weather Service Forecast Office;

b. During a precipitation event;

c. Within 24 hours after a precipitation event of ½ inch or more precipitation (as measured within a 24 hour period) that results in a storm water discharge of precipitation from the irrigation areas~~; and~~.

~~d. When the land application area surface soil is saturated.~~

Change No. 8: Section V.D.3 (page 23) has been updated to clarify the provision for Storage Tank Freeboard as follows:

Storage Tank Freeboard. The Discharger shall always maintain at least 10 percent of capacity, or 2 feet, whichever is greater, of freeboard in all ~~treatment, effluent, and~~ reclaimed water storage tanks.

Change No. 9: Section VIII.N (page 31) has been updated to amend the general provision as follows:

~~2.~~ The Discharger must always provide a sufficient number of qualified personnel to operate the Facility effectively to achieve the required level of treatment.~~Qualified personnel must be those meeting requirements of Division 7, Chapter 9 (commencing with Section 13625) of the California Water Code.~~

Change No. 10: Section VIII.O (page 32) has been updated to amend the general provision as follows:

If the ~~Discharger's wastewater treatment~~ Facility ~~plant~~ will reach capacity within 4 years, the Discharger shall notify the Regional Water Board. ~~A copy of such notification shall be sent to appropriate local elected officials, local permitting agencies, and the press. Factors to be evaluated in assessing reserve capacity shall include, at a minimum, (1) comparison of the wet weather design flow with the highest daily flow, and (2) comparison of the average dry weather design flow with the lowest 30-day flow.~~ The Discharger shall demonstrate that adequate steps are being taken to address the capacity problem. The Discharger shall submit a technical report to the Regional Water Board showing how flow volumes will be prevented from exceeding capacity, or how capacity will be increased, within 120 days after providing notification to the Regional Water Board, or within 120 days after receipt of Regional Water Board notification, that the Facility will reach capacity within 4 years. ~~The time for filing the required technical report may be extended by the Regional Water Board. An extension of 30 days may be granted by the Executive Officer, and longer extensions may be granted by the Regional Water Board itself (title 23, Cal. Code of Regs., section 2232)~~

Change No. 11: Footnote 8 of Attachment D, section II, Table G-1 (page D-3) has been updated to specify that the existing irrigation facilities include drip irrigation in the distribution system as follows:

[8] Existing permanent spray and drip irrigation distribution system prior to adoption of this Order, as described in Order section II.B.

Change No. 12: Attachment D, section II, Table G-3, Table Note No. 3 (page D-5) has been updated as follows:

3. The first sampling event must take place in May 2025. After the third annual sample, the frequency and requirements for subsequent monitoring events maybe be modified by the Executive Officer. ~~based on the results of the special study required in MRP section IV.D of this Order.~~

Change No. 13: Attachment D, section II, Table G-3, Minimum Sampling Frequency for Total Dissolved Solids (page D-5) has been updated as follows:

Quarterly~~[4][5]~~