**Response to Written Comments**
**Draft Waste Discharge Requirements**
**Order No. R1-2020-0010**
**National Pollutant Discharge Elimination System (NPDES)**
**for the**
**Windsor Water District Wastewater Treatment, Reclamation and Disposal Facility**
**Regional Water Quality Control Board, North Coast Region**
**August 20, 2020**

## Comment Letter Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2020-0010, National Pollutant Discharge Elimination System Permit (Draft Permit) for the Windsor Water District (Permittee) Wastewater Treatment, Reclamation and Disposal Facility (Facility) was originally March 30, 2020, but was extended to April 29, 2020 due to the Covid-19 shelter in place order. The Permittee provided timely comments. The Division of Drinking Water (DDW) submitted a Title 22 Engineering Report acceptance letter on April 16, 2020. The DDW letter included conditions for the Draft Permit and are included after the Permittee's comments.

Regional Water Board staff (Staff) met with the Permittee on July 9, 2020 to discuss the Permittee's comments. Responses to comments contained in this document are consistent with the discussion that occurred during the July 9, 2020 meeting.

In this document, the Permittee's comments are summarized, followed by the Staff response. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. 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 and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

## Permittee Comments

### Comment 1: Page 7, Section III.H

Section III.H of the proposed order includes peak wet weather flow limits, and sections VII.L and VII.M specify how compliance with peak wet weather flow limits shall be determined. The District has never experienced an incident in which peak wet weather flows resulted in bypass or overflow at the treatment facility. This is the result of collection system maintenance and influent equalization storage at the treatment plant. Furthermore, the current permit has no such limit and imposition of wet weather flow limits is not supported with any justification or technical analysis in the Fact Sheet of the proposed Order. Therefore, the District considers imposition of the wet weather flow limits unsupported, unwarranted, and unnecessary, and requests that they be removed from the permit.

Should the Regional Water Board provide sufficient justification and explanation, and choose to retain the limit, the District requests that the limit be modified to allow for the

possibility of an unprecedented rainfall event resulting in flow greater than the proposed peak weekly and peak monthly limits of 7.2 mgd and 3.75 mgd, respectively. The District requests the following revisions:

"III.H. The average daily dry weather flow of waste through the Facility in excess of 1.9 mgd is prohibited until such time as additional storage and/or total recycled water capacity has been added to accommodate a higher average dry weather flow, not to exceed 2.25 mgd. The peak weekly wet weather flow of waste through the Facility shall not exceed 7.2 mgd and the peak monthly wet weather flow of waste through the Facility shall not exceed 3.75 mgd unless resulting from a 25-year or less frequent storm event. Compliance with this prohibition shall be determined as defined in sections VII.K, VII.L and VII.M of this Order."

"VII.L. The peak weekly wet weather flow in section III.H of this Order will be determined by evaluating flow through the Facility at Monitoring Location INF-001, measured daily and averaged weekly. No average weekly flow shall exceed 7.2 mgd except as permitted in section III.H."

"VII.M. The peak monthly wet weather flow is the highest average monthly influent flow that is allowed. Compliance with the peak monthly wet weather flow prohibition in section III.H of this Order will be determined by averaging all of the average daily flows at Monitoring Location INF-001 each calendar month. If the calculated average monthly flow exceeds 3.75 mgd in any calendar month except as permitted in section III.H, the discharge does not comply with Prohibition III.H of this Order."

***Response 1:*** *Staff recognizes the efforts of the Permittee in preventing bypass and overflow of the Facility as well as the ongoing maintenance of the collection system.*

*The 7.2 MGD peak weekly wet weather flow was submitted by the Permittee as part of the January 2019 Title 22 Engineering report. Specifically, section 2.3.1 (Flowrates) of the Report states that "the current treatment plant capacity is 2.25 million gallons per day (MGD) average dry weather flow (ADWF) and 7.2 MGD peak weekly wet weather flow (PWWWF).*

*The 3.75 MGD and 7.2 MGD values for the peak monthly wet weather flow (PMWWF) and PWWWF were retained from the previous permit in Table 1 and Table F-1 of the Draft Permit. As stated on page F-19 of the Draft Permit, "This Order establishes a new peak weekly wet weather flow prohibition based on the design treatment capacity of the Facility." The PWWWF of 7.2 MGD was established in order to ensure that the Facility's design treatment capacity is not exceeded which has the potential to cause bypass in the Facility's treatment processes. Influent data collected during the previous permit term had a maximum weekly flow of 4.8 MGD, well under the 7.2 MGD prohibition.*

*The 3.75 MGD peak monthly wet weather flow was incorrectly inserted into in prohibition III.H. in the Draft Permit and has been removed from section III.H of the Proposed Permit. The following revisions have been made to the Proposed Permit.*

***Table 1. Permittee Information***

| | |
|---|---|
| ***Permittee*** | *Windsor Water District* |
| ***Name of Facility*** | *Windsor Wastewater Treatment, Reclamation, and Disposal Facility* |
| ***Facility Address*** | *8400 Windsor Road*<br>*Windsor, CA 95492*<br>*Sonoma County* |
| ***Type of Facility*** | *Publicly Owned Treatment Works (POTW)* |
| ***Facility Design Flow*** | *2.25 million gallons per day (mgd) (average dry weather design flow)*<br>*7.2 mgd (peak weekly wet weather design flow)*<br>~~*3.75 mgd (peak monthly wet weather design flow)*~~ |

***Discharge Prohibition III.H.***

*The average daily dry weather flow of waste through the Facility in excess of 1.9 mgd is prohibited until such time as additional storage and/or total recycled water capacity has been added to accommodate a higher average dry weather flow, not to exceed 2.25 mgd. The peak weekly wet weather flow of waste through the Facility shall not exceed 7.2 mgd* ~~*and the peak monthly wet weather flow of waste through the Facility shall not exceed 3.75 mgd*~~*. Compliance with this prohibition shall be determined as defined in sections VII.K*~~*,*~~ *and VII.L* ~~*and VII.M*~~ *of this Order.*

***Compliance Determination Section VII.M.***

~~***M. Peak Monthly Wet Weather Flow***~~

~~*The peak monthly wet weather flow is the highest average monthly influent flow that is allowed. Compliance with the peak monthly wet weather flow prohibition in section III.H of this Order will be determined by averaging all of the average daily flows at Monitoring Location INF-001 each calendar month. If the calculated average monthly flow exceeds 3.75 mgd in any calendar month, the discharge does not comply with Prohibition III.H of this Order.*~~

***Table F-1. Facility Information***

| | |
|---|---|
| ***WDID*** | *1B82037OSON* |
| ***Permittee*** | *Windsor Water District* |
| ***Name of Facility*** | *Windsor Wastewater Treatment, Reclamation, and Disposal Facility* |
| ***Facility Address*** | *8400 Windsor Road*<br>*Windsor, CA 95492*<br>*Sonoma County* |
| ***Facility Contact, Title and Phone*** | *Dave Ernst, Wastewater Treatment Superintendent, (707) 838-5328*<br>*Veronica Siwy, Environmental Program Manager, (707) 838-1218* |
| ***Authorized Person to Sign and Submit Reports*** | *Dave Ernst, Wastewater Treatment Superintendent, (707) 838-5328*<br>*Veronica Siwy, Environmental Program Manager, (707) 838-1218* |
| ***Mailing Address*** | *P.O. Box 100, Windsor, CA 95492* |
| ***Billing Address*** | *Same as Mailing Address* |
| ***Type of Facility*** | *Publicly Owned Treatment Works (POTW)* |
| ***Major or Minor Facility*** | *Major* |
| ***Threat to Water Quality*** | *1* |
| ***Complexity*** | *A* |
| ***Pretreatment Program*** | *Not Applicable* |
| ***Recycling Requirements*** | *Producer* |
| ***Facility Permitted Flow*** | *1.9 million gallons per day (mgd) (average daily dry weather flow)*[1] |
| ***Facility Design Flow*** | *2.25 mgd (average dry weather design flow)*<br>*7.2 mgd (peak weekly wet weather design flow)*<br>~~*3.75 mgd (peak monthly wet weather design flow)*~~ |
| ***Watershed*** | *Russian River Hydrologic Unit, Mark West Hydrologic Subarea* |
| ***Receiving Water*** | *Mark West Creek* |
| ***Receiving Water Type*** | *Inland surface water* |

*Table Notes:*

1. *The permitted flow may be increased up to 2.25 mgd during the permit term if the Permittee demonstrates that additional water recycling capacity has been added in accordance with sections IV.C.3 and 4 of this Order.*

***Section II.A.2. of the Fact Sheet***

***2. Wastewater Treatment Facility***

*The current Facility provides advanced wastewater treatment (AWT) and has design capacities of 2.25 mgd as an average dry weather flow (ADWF)~~, 3.75 mgd as a peak monthly wet weather flow,~~ and 7.2 mgd as a peak weekly wet weather flow. The wastewater treatment facilities include biological secondary treatment utilizing extended air activated sludge aeration basins and secondary clarifiers; AWT that includes chemical addition facilities, flocculation tanks, AWT clarifiers, and sand filters; ultraviolet (UV) disinfection; and storage prior to water recycling, discharge to the Geysers recharge pipeline, and/or discharge to Mark West Creek. A portion of the treated and UV disinfected effluent is chlorinated and transferred to Windsor High School for toilet flushing and landscape irrigation.*

***Section IV.A.8. of the Fact Sheet***

***Discharge Prohibition III.H.*** *The average daily dry weather flow of waste through the Facility in excess of 1.9 mgd is prohibited until such time as additional storage and/or total recycled water capacity has been added to accommodate a higher average dry weather flow, not to exceed 2.25 mgd. The peak weekly wet weather flow of waste through the Facility shall not exceed 7.2 mgd. ~~The peak monthly wet weather flow of waste through the Facility shall not exceed 3.75 mgd.~~ Compliance with this prohibition shall be determined as defined in sections VII.K~~,~~ and VII. L ~~and VII.M~~ of this Order.*

*The average dry weather flow prohibition is retained from Order No. R1-2013-0042 and is based on the average dry weather treatment and disposal capacity of the Facility. Consistent with Order No. R1-2013-0042, the average dry weather flow may be increased from 1.9 mgd to 2.25 mgd if the Permittee demonstrates that additional storage and/or disposal capacity has been added to accommodate a higher average dry weather flow.*

*The 7.2 MGD peak weekly wet weather flow was submitted by the Permittee as part of the January 2019 Title 22 Engineering report. Specifically, section 2.3.1 (Flowrates) of the Report states that "the current treatment plant capacity is 2.25 million gallons per day (MGD) average dry weather flow (ADWF) and 7.2 MGD peak weekly wet weather flow (PWWWF)."*

*This Order establishes a new peak weekly wet weather flow prohibition based on the design treatment capacity of the Facility. Exceedance of this capacity on a weekly basis may result in effluent violations and/or the need to by-pass untreated effluent blended with treated effluent, which is prohibited.*

**Comment 2: Page 10, Section IV.C.1.a**

Section IV.C.1.a - Location for Discharge Point 003B has been removed from the permit but is listed in several sections throughout. Discharge Point 003B should be removed from the permit. Revise IV.C.1.a. to read:

C. Water Recycling Specifications and Requirements – Discharge Points 001, 003A, ~~003B~~, 004, and 005

1. Water Recycling Specifications

a. When discharging to the recycled water system at Discharge Points 003A, ~~003B,~~ the Geysers Recharge Project at Discharge Point 004, and the Joint Use Program at Discharge Point 005, the Permittee shall maintain compliance with the following specifications at Discharge Point 001, with compliance measured at Monitoring Location ~~REC-001~~ EFF-001, as described in the attached MRP (Attachment E). All tertiary recycled water shall be adequately oxidized, filtered, and disinfected as defined in title 22, division 4, chapter 3 of the CCR.

***Response 2:*** *003B is a Distribution Location and not a Discharge Point. With the Permittee enrolling in the Recycled Water General Order (RWGO), the monitoring for the distribution locations will be handled under the RWGO MRP. Distribution Point 003B identifies when disinfected tertiary recycled water is sent to the Windsor High School for landscape irrigation and toilet flushing. It was inadvertently left out of Table 3 of the Draft Permit.*

*Staff agree that it is appropriate to remove language that addresses the recycled water distribution locations from regulatory sections of the Draft Permit and MRP, including complete removal of Table 3, "Recycled Water Distribution Locations". Staff opted not to remove the Distribution Locations from Table E-1 entirely, as Discharge Location EFF-001 serves as both a Distribution Monitoring Location (REC-001) and Effluent Monitoring Location (EFF-001) when effluent is directed to recycled water storage where it could be discharged to surface waters or sent into the recycled water distribution system for irrigation or Geysers reuse.*

*Table E-1 has been modified to distinguish between distribution and discharge points and to include the following table note: "1. Monitoring Locations EFF-001 and REC-001 are the same location, the sampling point immediately following the UV disinfection system. Different monitoring location names have been assigned due to differences in monitoring requirements at Monitoring Location EFF-001 and Monitoring Location REC-001 (during periods of discharge to the recycled water system). The Permittee has the ability to discharge directly to the recycled water distribution system and bypass the storage ponds."*

***~~Table 3. Recycled Water Distribution Locations~~***

| ***~~Distribution Point~~*** | ***~~Effluent Description~~*** | ***~~Distribution Point Latitude (North)~~*** | ***~~Distribution Point Longitude (West)~~*** | ***~~Use Location~~*** |
|---|---|---|---|---|
| *~~003A~~* | *~~Disinfected Tertiary Treated Municipal Wastewater~~* | *~~--~~* | *~~--~~* | *~~Various irrigation discharges~~* |
| *~~004~~* | *~~Disinfected Tertiary Treated Municipal Wastewater~~* | *~~--~~* | *~~--~~* | *~~Geysers Recharge Project~~* |
| *~~005~~* | *~~Disinfected Tertiary Treated Municipal Wastewater~~* | *~~--~~* | *~~--~~* | *~~Recycled water storage and use associated with a Joint Use Program with the Airport-Larkfield-Wikiup Sanitation Zone, Sonoma County Water Agency, and the City of Santa Rosa~~* |

*~~Table Note:~~*

*~~1. This Order prescribes requirements for the production of recycled water. Requirements that apply to recycled water use are addressed in the Permittee's enrollments under State Water Resources Control Board Order No. WQ-2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order.~~*

***Table E-1. Monitoring Station Locations***

| Discharge Point Name | Monitoring Location Name | Monitoring Location Description |
|---|---|---|
| 001 | EFF-001[1] | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds or Mark West Creek. |
| 002 | EFF-002 | Tertiary treated, disinfected wastewater before effluent contacts the receiving water. |
| 001 | REC-001[1] | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds, from which discharges occur to the recycled water system at distribution locations 003A, 003B, 004 and 005. |
| -- | RSW-001 | Mark West Creek surface water upstream beyond the influence of the discharge. |

Table Notes:

1. Monitoring Locations EFF-001 and REC-001 are the same location, the sampling point immediately following the UV disinfection system. Different monitoring location names have been assigned due to differences in monitoring requirements at Monitoring Location EFF-001 and Monitoring Location REC-001 (during periods of discharge to the recycled water system). The Permittee has the ability to discharge directly to the recycled water distribution system and bypass the storage ponds.

**Comment 3: Page 14, Section IV.D.3**

Section IV.D.3 is unclear and could be construed to require storage pond construction. The District therefore requests the following change:

**3. Storage Ponds.** Any new storage ponds constructed by the ~~The~~ Permittee shall be constructed ponds in a manner that protects groundwater. Prior to construction or use of any new storage ponds, or repurposing of existing ponds for recycled water storage, the Permittee shall submit to the Regional Water Board Executive Officer for review and approval, a technical report that includes design proposals and a technical evaluation that demonstrates that the pond design complies with the Water Code and Basin Plan. ~~title 27 of the California Code of Regulations~~. Pond design and operation plans must include features and best management practices (BMPs) to protect groundwater and prevent exceedances of groundwater quality objectives."

***Response3:*** *The Proposed Permit has been modified as requested in Comment 3.*

**Comment 4: Page 15: Section V.A.1**

Section V.A.1: District requests a compliance schedule and interim limits for dissolved oxygen (DO) in the reissued NPDES permit. The District requests an in-permit compliance schedule in accordance with the State Water Resources Control Board (State Water Board) Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits (State Water Board Resolution No. 2008-0025, Compliance Schedule Policy). The compliance schedule will give the District time to conduct studies and identify a preferred method to achieve compliance with the final DO receiving water limit. Information to support the request for an interim limit and an in-permit compliance schedule is provided in Attachment A.

As detailed in Attachment A, the District requests that the permit be modified as follows:

a. Amend the DO limit in section VI.A.1 as follows:

"The discharge shall not cause the dissolved oxygen (DO) concentration of the receiving water to be depressed below 9.0 mg/L.

In those waterbodies for which the aquatic life-based DO requirements are unachievable due to natural conditions[8], the lesser of the 9.0 mg/L value and a site-specific background DO requirements can be applied[9] as water quality objectives by calculating the daily minimum DO necessary to maintain 85% DO saturation during the dry season and 90% DO saturation during the wet season under site salinity, site atmospheric pressure, and natural receiving water temperature[10]. In no event may controllable factors reduce the daily minimum DO below 6.0 mg/L."

b. Retain the existing DO limit as an interim limit. Attachment A, Figure 4 shows the District cannot reliably comply with a limit greater than 7 mg/L.

c. Add an in-permit compliance schedule in accordance with the State Water Resources Control Board (State Water Board) Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits (State Water Board Resolution No. 2008-0025, Compliance Schedule Policy). The compliance schedule will give the District time to evaluate and identify the most appropriate alternative to achieve compliance with the final receiving water limits for DO in the proposed 2020 NPDES permit. The requested compliance schedule is as follows:

**Proposed Actions and Timeline to Achieve Compliance with Dissolved Oxygen Receiving Water Limitation**

| Task | Proposed Action | Estimated Dates(1) |
|---|---|---|
| 1 | Develop study plan | Sept 2020 – Dec 2020 |
| 2 | Contract with experts (fisheries, aquatic ecosystems, wastewater engineers) and implement study plan | Jan 2021 – Dec 2021 |
| 3 | Prepare study report, identify feasible compliance options, select preferred solution | Jan 2022 – March 2023 |
| 4 | Submit study report with preferred solution identified to Regional Water Board for review | April 2023 |
| 5 | Start implementing preferred solution (with concurrence from Regional Water Board) | June 2023 |
| 6 | Secure project funding (if new infrastructure is required) | June 2023 – May 2024 |
| 7 | Design project | June 2024 – May 2025 |
| 8 | Conduct CEQA and project permitting | Nov 2024 – April 2025 |
| 9 | Advertise, award project | June 2025 – Aug 2025 |
| 10 | Construct project | June 2026 – Aug 2027 |
| 11 | Project commissioning and testing | Sept 2027 – Oct 2027 |
| 12 | Submit progress reports to Regional Water Board | March 1, annually |
| 13 | Achieve full compliance with DO receiving water limitation | Nov 2027 |
| (1) Based on anticipated delays due to the COVID-19 pandemic and municipal bond financing, the District will revisit the schedule prior to NPDES permit adoption and every year during implementation and make adjustments if needed. | | |

***Response 4:*** *Section 3.3.5 of the Basin Plan includes the daily minimum objective of 9.0 mg/L dissolved oxygen for the spawning, reproduction, and/or early development (SPWN) beneficial use. This section also includes a 7-day moving average objective of 11.0 mg/L that was not included in the Draft Permit. To ensure that the 7-day moving average of 11.0 mg/L is maintained, Section V.A.1. of the Proposed Permit has been modified as follows.*

*"The discharge shall not cause the dissolved oxygen (DO) concentration of the receiving water to be depressed below 9.0 mg/L daily and 11.0 mg/L as a rolling 7-day average."*

*It is important to recognize that the objective states that the discharge does not cause DO concentration of the receiving water to be depressed below the specified concentrations. Staff recognize the concern of the Permittee in meeting the dissolved oxygen (DO) surface water limitation from the North Coast Basin Plan (Basin Plan). Staff has pulled the DO data for the effluent, upstream and downstream receiving water monitoring locations from CIWQS for 2012-2020 to analyze the Permittee's potential impact on DO concentrations in Mark West Creek.*

*The average difference in DO concentration from 107 receiving water samples resulted in a 0.004 mg/L increase at the downstream monitoring location. Two of the 107 receiving water samples had a concentration above 9 mg/L upstream (9.79 mg/L and 9.3 mg/L) and lower than 9 mg/L downstream (8.87 mg/L and 8.25 mg/L respectively). Therefore, 1.8% of the receiving water samples show a possibility of the DO concentration of the receiving water being depressed below 9.0 mg/L. Multiple factors apart from the Permittee's discharge could have decreased the downstream receiving water concentration such as photosynthesis, respiration, decomposition and sediment oxygen demand. Analysis of the upstream receiving water monitoring data shows that DO concentrations in Mark West Creek never met the rolling 7-day average of 11.0 mg/L. Therefore, the Permittee is likely not the cause of the receiving water being depressed below the 11.0 mg/L.*

*From that analysis, Staff has concluded that the Permittee's discharge does not cause the receiving water DO concentration to be depressed below either 9.0 mg/L or the 11.0 mg/L rolling average. Therefore, no changes have been made to the Proposed Permit in response to Comment 4. Continuous DO data collected during the life of the Proposed Permit will continue to inform Staff and allow for a deeper understanding between the Permittee's DO concentration in their effluent and the impact on the receiving water DO concentrations. If Staff determines, during the life of the Proposed Permit, that the Permittee is causing the DO to be depressed below these levels then the Regional Water Board may require an investigation to determine cause and culpability prior to asserting that a violation has occurred. Staff recognize that many factors must be considered when assessing compliance with receiving water limitations. Section V (Receiving Water Limitations) of the Proposed Permit has been modified to read, "…The Regional Water Board may require an investigation <u>and/or may consider other available information</u> to determine cause and culpability prior to asserting that a violation has occurred."*

*Additionally, in the case that it's determined that the dissolved oxygen limitations are unachievable due to natural conditions, the Fact Sheet section V.A has been modified to include the following sentence: <u>"The dissolved oxygen receiving water limitation provides for consideration of a modified limit for waterbodies for which the aquatic life-based dissolved oxygen requirements are unachievable due to natural conditions. The</u>*

*intent of this language is to provide a means to adjust the dissolved oxygen limit to a concentration less than the 9.0 mg/L daily limit and 11.0 mg/L 7-day moving average limit established in section V.A of the Order and not to increase the limits."*

**Comment 5: Page 20, Section VI.C.2.a**

Section V.C.2.a: Pathogen Special Study – A special study is required to evaluate whether the discharge of recycled water to Mark West Creek complies with the bacteria water quality objective and the Russian River Watershed Pathogen TMDL Action Plan. The draft permit includes a requirement of weekly *E. coli* monitoring at EFF-001 when discharge is occurring directly from the UV channel. Weekly monitoring of *E. coli* is also required at EFF-002 when discharge is occurring from storage ponds. Since the permit includes a requirement to submit a work plan to conduct a study of the District's ability to comply with the bacteria water quality objective, imposition of a weekly monitoring frequency seems premature and presupposes the outcome of a deliberate study plan development process. The District requests that Tables E-3 and E-4 be modified as follows:

**Excerpt of Table E-3. Effluent Monitoring – Monitoring Location EFF-001**

| Parameter | Units | Sample Type | Minimum Sampling Frequency | Required Analytical Test Method[1] |
|---|---|---|---|---|
| Total Coliform Bacteria[8] | MPN/100 mL | Grab | Daily[4,5] | Part 136[3] |
| ~~*E. coli*[8]~~ | ~~cfu/100mL~~ | ~~Grab~~ | ~~Weekly[5]~~ | ~~Part 136[3]~~ |
| Radioactivity[6] | pCi/L[7] | Grab | Once per Permit Term | Part 136[3] |

Table Notes:
1. The Permittee shall report the daily average and monthly average flows.
2. Accelerated monitoring (weekly monitoring frequency). If two consecutive weekly test results exceed an effluent limitation, the Permittee shall take two samples each of the 2 weeks following receipt of the second sample result. During the intervening period, the Permittee shall take steps to identify the cause of the exceedance and take steps needed to return to compliance.
3. Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Regional Water Board or State Water Board, such as with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration).
4. Accelerated Monitoring (daily and five times per week monitoring frequencies). If a test result exceeds an effluent limitation, the Permittee shall increase the monitoring frequency to a minimum of twice a day for a week to evaluate whether an exceedance is persisting. If two or more samples in a week exceed an effluent limitation, the Permittee shall take steps to identify the cause of the exceedance and take steps needed to return to compliance.

5. The Permittee shall collect and analyze samples from each operational UV disinfection channel for total coliform bacteria and E. coli. MPN and CFU are comparable units. The Permittee may use any E. coli method specified in 40 CFR 135 for compliance monitoring for E. coli.
6. Radionuclides measured shall include combined radium-226 and radium-228, gross alpha, gross beta, tritium, strontium-90, and uranium.
7. Results for gross beta shall be reported in units of millirem/year in accordance with EPA's Implementation Guidance for Radionuclides [EPA 816-F-00-002, March 2002].
~~8. Monitoring for E. coli at EFF-001 shall occur when the Permittee is discharging to Mark West Creek directly from the UV channels. Monitoring for total coliform at EFF-001 shall occur when the Permittee discharges to their recycled water storage ponds from the UV channels.~~

**Excerpt of Table E-4. Effluent Monitoring – Monitoring Location EFF-002**

| Parameter | Units | Sample Type | Minimum Sampling Frequency | Required Analytical Test Method[1] |
|---|---|---|---|---|
| Total Coliform Bacteria[8] | MPN/100 mL | Grab | Daily[4,5] | Part 136[3] |
| ~~*E. coli*[8]~~ | ~~cfu/100mL~~ | ~~Grab~~ | ~~Weekly[5]~~ | ~~Part 136[3]~~ |
| Radioactivity[6] | pCi/L[7] | Grab | Once per Permit Term | Part 136[3] |

If *E. coli* monitoring is not deleted as requested, the District requests clarification of the geometric mean calculation requirement. Section V.A.18 describes the receiving water limit for *E. coli* as a six-week rolling geometric mean. Section VII.H.2 states that the "rolling geometric mean shall be calculated using at least 5 sample results over a six-week period." The District's discharge is intermittent and, since sample collection would occur only when discharge is occurring, the number of samples may not meet the five sample over six-week basis for geometric mean calculation. The District requests that a provision be added to the permit specifying that the median value be used in the event that less than five samples are available during a period of discharge by modifying Section V.A.18 as follows.

"The bacteria water quality objective for all waters where the salinity is equal to or less than 1 part per thousand (ppt) 95 percent or more of the time during the calendar year is: a six week rolling geometric mean of *Escherichia coli* (*E. coli*) not to exceed 100 colony forming units (cfu) per 100 milliliter (mL), calculated weekly, and a statistical threshold value (STF) of 320 cfu/100 mL not to be exceeded by more than 10 percent of the samples collected in a calendar month, calculated in a static manner. <u>If sufficient samples cannot be collected to support calculation of a geometric mean due to discharge intermittency, a median value shall be calculated and used in place of the geometric mean to determine compliance.</u>"

***Response 5:*** *The Clean Water Act requires NPDES permits to meet water quality standards for the protection of aquatic life and human health. E. coli Bacteria Objectives (Standards) were adopted by the Environmental Protection Agency on March 22, 2019, as part of an update to State Water Boards Inland Surface Waters, Enclosed Bays and Estuaries policy. E. coli objectives are for the protection of recreation activities in surface waters. The Permittee discharges to surface waters with the REC-1 beneficial use and must comply with the E. coli water quality objectives.*

*Regular monitoring for E.coli is appropriate under the Proposed Permit, although the Regional Water Board may allow the E. coli monitoring required by Tables E-3 and E-4 to be superseded by the monitoring plan presented in the approved Pathogen Special Study. To consider a modification to the E. coli Minimum Sampling Frequency, the proposed sampling plan must be sufficient to allow Regional Water Board staff to perform a reasonable potential analysis and receive approval by the Executive Officer.*

*Tables E-3 and E-4 have been modified to include the following new Table Note: "With approval by the Executive Officer, the minimum sampling frequency may be modified or superseded to conform to the monitoring frequency within the approved Pathogen Special Study Work Plan required by section VI.C.2.a of this Order."*

*The Regional Water Board recognizes the intermittent nature of the Permittee's discharge and that a geometric mean requires a statistically sufficient number of samples that is generally not less than five samples distributed over a six-week period but a minimum of three samples can be used. Section VII.H.2 of the Proposed Permit has been modified to include Footnote 12 to read: "A minimum of three samples over a six-week period is necessary to calculate the geometric mean. When less than three samples are taken in a six-week period, compliance with the E. coli receiving water objective shall be determined using the Statistical Threshold Value (STV). If the Permittee samples less than three times during a six-week period, compliance shall be assessed by comparing the single sample results to the STV." In addition, the following table note has been added to Tables E-3 (Table Note 8) and E-4 (Table Note 14): "A minimum of three samples over a six-week period is necessary to calculate the geometric mean. See also Order section VII.H.2, Footnote 12."*

*It should be noted that Section V of the Proposed Permit states that receiving water conditions not in conformance with the limitations are not necessarily a violation of the Order. The Regional Water Board may require an investigation to determine cause and culpability prior to asserting that a violation has occurred.*

**Comment 6: Page 20, Section VI.C.2.b**

Section VI.C.2.b: Request a later due date for the Engineering Evaluation of Recycled Water and Wastewater Storage Ponds and Discharge Outfall work plan and schedule to 8/2021, with final report deadline remaining the same. Revise Section VI.C.2.b to read as follows:

**b. Engineering Evaluation of Recycled Water and Wastewater Storage Ponds and Discharge Outfall.** The Permittee shall submit for Regional Water Board Executive Officer approval, a work plan and schedule by ~~February 1, 2021~~ August 1, 2021, for conducting an engineering evaluation of all recycled water and wastewater storage ponds and infrastructure to assess the condition of each storage pond and discharge outfall and associated infrastructure (e.g., piping, pumps, valves, etc.). Upon completion of the engineering evaluation, a final report shall be submitted to the Regional Water Board in conjunction with the ROWD on July 31, 2024. The final report shall describe the condition of each recycled water and wastewater storage pond, outfall, and associated infrastructure, identify a plan for addressing any deficiencies identified and to ensure proper on-going maintenance, and provide an updated map of discharge outfalls and associated infrastructure.

***Response 6:*** *The Proposed Permit has been amended as requested in Comment 6.*

**Comment 7: Page 23, Section VI.C.4.c**

Section VI.C.4.c: Request that the requirement to file monthly operating records be stricken from the permit and propose to keep updated operating records on file and available for North Coast RWQCB review. Revise section VI.C.4.c to read as follows:

c. Operating Records. Operating records shall be maintained at the reclamation plant or a central depository within the operating agency and be available for review upon request, following records retention requirements. These shall include: all analyses specified in the reclamation criteria; records of operational problems, plant and equipment breakdowns, and diversions to emergency storage or disposal; all corrective or preventive action taken. ~~File monthly with the North Coast RWQCB.~~

***Response 7:*** *Page 23, section VI.C.4.c of the Proposed Permit has been modified as requested in Comment 7.*

**Comment 8: Page 23, Section VI.C.5.b.ii.c.(1) & (2)**

Section VI.C.5.b.ii.c.(1) & (2): Request for priority pollutant sampling conducted during first discharge season following permit adoption. This schedule would align with monitoring requirements as set forth by Table.E-2 in Appendix E, “Influent monitoring shall consist of a full CTR priority pollutant scan during the first year of the permit term with quarterly annual samples analyzed for those pollutants detected in the scan.” Also request to submit results of the Industrial Waste Survey (IWS) and priority pollutant monitoring report along with the ROWD due on July 30, 2024. Revise section V.C.5.b.ii.c.(1) & (2) to read as follows:

**c. Industrial Waste Survey (IWS)**

(1) The Permittee shall conduct an IWS of all the industrial users (IUs) in the service area of the Facility to determine whether any IUs are subject to pretreatment standards

specified in 40 C.F.R. part 403. The Permittee shall also perform a priority pollutant scan of the influent to the Facility. At a minimum, the IWS must identify the following for each industrial user and zero-discharging categorical industrial user: whether it qualifies as a significant user; the average and peak flow rates; the SIC code; any pretreatment being implemented by each industrial user; and whether or not the Permittee has issued a permit to any of the identified industrial users. The IWS and priority pollutant monitoring is required during the ~~12-month period that begins on January 1, 2022~~ first discharge season of the permit term.

(2) The results of the IWS and priority pollutant monitoring shall be submitted to the Regional Water Board in a written report no later than **~~August 1, 2023~~ July 30, 2024**. The written report shall include a certification report indicating whether the Facility receives pollutants from any IU that would require the Permittee to establish a pretreatment program in accordance with 40 C.F.R. part 403.

***Response 8:*** *Page 23, sections VI.C.5.b.i.c.(1) and (2) of the Proposed Permit has been modified as requested in Comment 8.*

**Comment 9: Page 27, Table 8**

Section VI.7.a (Table 8): Revise Task 3 date included in Task Description from 2020/2021 to 2021/2022 to match stated due dates.

**Table 7 Schedule for Compliance with Final Effluent Limitation for Total Phosphorus[1]**

| Task | Task Description | Due Date |
|---|---|---|
| 1 | The Permittee shall submit an annual report that identifies the specific activities, programs, and/or approved projects that the Permittee plans to implement to reduce and/or offset discharges of total phosphorus into Mark West Creek for the following discharge season. The report shall also contain the following information regarding the previous discharge season: report on activities, programs, and/or approved projects implemented or completed, documentation that demonstrates that the required reduction/offset was achieved, including an accounting of the total amount of phosphorus discharged (measurements and/or calculations) and the total amount of the phosphorus reduced and/or offset.[2,3] | October 1, annually |
| 2 | The Permittee shall have completed all activities, programs, and/or approved projects resulting in the reduction and/or offset of at least 50 percent of the Permittee's estimated mass discharge of total phosphorus for the 2020/2021 discharge season. | October 1, 2020 |

| Task | Task Description | Due Date |
|---|---|---|
| 3 | The Permittee shall have completed all activities, programs, and/or approved projects resulting in the reduction and/or offset of at least 66 percent of the Permittee's estimated mass discharge of total phosphorus for the ~~2020/2021~~ 2021/2022 discharge season. | October 1, 2021 |
| 4 | The Permittee shall have completed all activities, programs, and/or approved projects resulting in the reduction and/or offset of at least 100 percent of the Permittee's estimated mass discharge of total phosphorus for the ~~impending~~ 2022/2023 discharge season, and annually thereafter. | October 1, 2022, and annually thereafter |

Table Notes:

1. The Permittee shall notify the Regional Water Board, in writing, no later than 14 days following each interim date of compliance or noncompliance with the interim requirements. Each task in this table requires submittal of a written report. To comply with this requirement, each report should identify whether the Permittee is in compliance or noncompliance with the task being reported on.
2. Each year, the Permittee must offset the required percentage of total phosphorus. Projects and activities that reduce the amount of total phosphorus that is discharged will result in a smaller amount of phosphorus to be offset.
3. In accordance with this annual report requirement, the Permittee will be completing reduction and offset activities in advance of the discharge season during which those reductions/offsets will be claimed. The first annual report, due on October 1, 2020, must describe the Permittee's plan to reduce and offset discharges of phosphorus during the period of October 2020 through September 2021, so that reduction/offset projects have been completed in advance of the discharge season that begins on October 1, 2021. Subsequent annual reports must describe the Permittee's reduction/offset plan for the next year and provide a report of activities that were completed in the previous year.

***Response 9:*** *Table 7 on page 27 of the Proposed Permit has been modified as requested in Comment 9.*

***Excerpt from Table 7 Schedule for Compliance with Final Effluent Limitation for Total Phosphorus[1]***

| | | |
|---|---|---|
| 3 | The Permittee shall have completed all activities, programs, and/or approved projects resulting in the reduction and/or offset of at least 66 percent of the Permittee's estimated mass discharge of total phosphorus for the ~~2020/2021~~ 2021/2022 discharge season. | October 1, 2021 |
| 4 | The Permittee shall have completed all activities, programs, and/or approved projects resulting in the reduction and/or offset of at least 100 percent of the Permittee's estimated mass discharge of total phosphorus for the ~~impending~~ 2022/2023 discharge season, and annually thereafter. | October 1, 2022, and annually thereafter |

**Comment 10: Pages 28 and 29, Sections VII.B, VII.C and VII.D**

Section VII.B, C and D: Request that arithmetic mean calculations be allowed regardless of ND or DNQ results in the data set. We propose to use the MDL for the ND value and the DNQ value to calculate arithmetic means for monthly averages. This approach would allow for our data management system, Hach WIMS, to streamline reporting. Revise Section VII.B, C and D to read as follows:

B. Multiple Sample Data

When determining compliance with an AMEL for priority pollutants, and more than one sample result is available, the Permittee shall compute the arithmetic mean. ~~unless~~ In the cases where the data set contains one or more reported determinations of DNQ or ND. ~~In those cases~~, the Permittee shall use the MDL for the ND value and the DNQ value to compute the median in place of the arithmetic mean. ~~in accordance with the following procedure.~~

~~1. The data set shall be ranked from low to high, ranking the reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant.~~

~~2. The median value of the data set shall be determined. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two middle values unless one or both of the points are ND or DNQ, in which case the median value shall be the lower of the two data points where DNQ is lower than a value and ND is lower than DNQ and a value of zero shall be used for the ND or DNQ value in the median calculation for compliance purposes only.~~

C. Average Monthly Effluent Limitation (AMEL)

If the average (or when applicable, the median determined by subsection B, above, for multiple sample data) of daily discharges over a calendar month exceeds the AMEL for

a given parameter, this will represent a single violation, though the Permittee will be considered out of compliance for each day of that month for that parameter (e.g., resulting in 31 days of non-compliance in a 31-day month). If only a single sample is taken during the calendar month and the analytical result for that sample exceeds the AMEL, the Permittee will be considered out of compliance for that calendar month. The Permittee will only be considered out of compliance for days when the discharge occurs. If there are ND or DNQ results for a specific constituent in a calendar month, the Permittee shall ~~calculate the median of all sample results within that month for compliance determination with~~ determine the AMEL as described in section VII.B, above.

D. Average Weekly Effluent Limitation (AWEL)

If the average (or when applicable, the median determined by subsection B, above, for multiple sample data) of daily discharges over a calendar week exceeds the AWEL for a given parameter, this will represent a single violation, though the Permittee will be considered out of compliance for each day of that week for that parameter, resulting in 7 days of non-compliance. If only a single sample is taken during the calendar week and the analytical result for that sample exceeds the AWEL, the Permittee will be considered out of compliance for that calendar week. The Permittee will only be considered out of compliance for days when the discharge occurs If there are ND or DNQ results for a specific constituent in a calendar week, the Permittee shall ~~calculate the median of all sample results within that week for compliance determination with~~ determine the AWEL as described in section VII.B, above.

***Response 10:*** *Section 2.4.5 of the Policy for Implementations of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SIP) contains compliance determination language for effluent limitations. Specifically, this section includes compliance determination language for Average Monthly Effluent Limitations when more than one sample result is available in a month.*

*The specific language states:*

*"When determining compliance with an AMEL and more than one sample result is available in a month, the discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of DNQ or ND. In those cases, the discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:"*

*"1. The data set shall be ranked from low to high, reported ND determinations lowest, DNQ determinations next, followed by quantified values (if any). The order of the individual ND or DNQ determinations is unimportant."*

*"2. The median value of the data set shall be determined. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the*

*middle unless one or both of the points are ND or DNQ, in which case the median value shall be the lower of the two data points where DNQ is lower than a value and ND is lower than DNQ."*

*The compliance determination listed above is required for all priority pollutant samples per the SIP. Therefore, no changes have been to the Proposed Permit in response to Comment 10.*

**Comment 11: Page 32, Section VII.O.**

Section VII.O: Request to extend deadline to select method in which phosphorus effluent limitation may be demonstrated to February 1, 2022. Per Table 8, the permit establishes deadline for 100 percent reduction in total phosphorus starting in October 2022. Revise Section VII.O to read as follows:

O. Final Effluent Limitation for Total Phosphorus

Effective for the discharge season following the completion of the interim effluent limit compliance schedule included as Table 9 in section VI.C.7, above, the Permittee shall comply with the WQBEL for total phosphorus (Effluent Limitation IV.A.2.b. of this Order). Compliance with the total phosphorus effluent limitation may be demonstrated in one of two ways as described in 1 and 2, below. Selection of either Option 1 or 2 must be made in writing and submitted to the Regional Water Board by ~~**February 1, 2021**~~ **February 1, 2022.**

***Response 11:*** *Table 7 of the Proposed Permit establishes a 100 percent compliance date of October 2022. The Permittee has been proactive in developing projects under the WQTF and has reduced the phosphorus concentration in their discharge below 1 mg/L through process changes at the Facility. Page 32, section VII.N of the Proposed Permit has been amended as requested in Comment 11. The revised date for selecting the option for phosphorus compliance is February 1, 2022 to align with the final date in the Compliance Schedule.*

**Comment 12: Page 32, Section VII.O**

In reference to the updated WQT Framework included in Attachment I, the District is grateful for the improvements; however, the WQT Framework is a standalone document. It is the opinion of the District that any changes should be made and adopted outside of this permit so as to avoid different adopted Framework versions and make all versions available to credit generators and purchasers consistently.

***Response 12:*** *The Water Quality Trading Framework (WQTF) has been designed to replace the existing Santa Rosa Nutrient Offset Program and to be available to both the City of Santa Rosa and the Town of Windsor as an approved method for complying with the "no net loading" effluent limitation for total phosphorus established in each of their respective NPDES permits. The WQTF was initially adopted separately from the permit*

*renewals in order to have the WQTF in place in time for the permit renewals as the WQTF is a compliance option provided for both NPDES permittees to meet the no net loading effluent limitation.*

*Both Draft Orders went through a 30-day public comment period that also included the amended WQTF language.* Adoption of the modified WQTF within the Proposed Permit will replace the WQTF that was adopted in July 2018; therefore, only one version will be available thereafter to credit generators and purchasers for consistent application.

*No changes have been made to the Proposed Permit in response to Comment 12.*

**Comment 13: Page E-3, Table E-1**

Attachment E, Section II Table E-1: The discharge point for REC-001 new label for monitoring location is not consistent with the locations listed in Table 2 as well as locations listed in IV.C.1.a. The District requests that the monitoring location REC-001 be removed from the permit since recycled water will be under the statewide general order.

**Excerpt from Table E-1. Monitoring Station Locations**

| Discharge Point Name | Monitoring Location Name | Monitoring Location Description |
|---|---|---|
| 001 | EFF-001[1] | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds or Mark West Creek. |
| 002 | EFF-002 | Tertiary treated, disinfected wastewater before effluent contacts the receiving water. |
| 001 | ~~REC-001[1]~~ EFF-001 | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds, from which discharges occur to the recycled water system. |
| -- | RSW-001 | Mark West Creek surface water upstream beyond the influence of the discharge. |

| Discharge Point Name | Monitoring Location Name | Monitoring Location Description |
|---|---|---|
| ~~Table Notes:~~<br><br>1. ~~Monitoring Locations EFF-001 and REC-001 are the same location, the sampling point immediately following the UV disinfection system. Different monitoring location names have been assigned due to differences in monitoring requirements at Monitoring Location EFF-001 and Monitoring Location REC-001 (during periods of discharge to the recycled water system).~~ | | |

***Response 13:*** *REC-001 was not removed from the Proposed Permit because it is necessary to determine when the Permittee is discharging to the recycled water distribution system. REC-001 is the monitoring location used to identify when the Permittee is discharging to recycled water use sites. The Proposed Permit will regulate the production and storage side of the Permittee's recycled water system while the Recycled Water General Order will regulate the distribution and use side of the recycled water system.*

*Discharge Point 001 includes monitoring locations EFF-001 (discharge to storage ponds) and REC-001 (discharge to recycled water distribution system). Table E-1 in the Proposed Permit has been modified as follows to maintain consistency with Table 2.*

***Excerpt from Table E-1 Monitoring Station Locations***

| Discharge Point Name | Monitoring Location Name | Monitoring Location Description |
|---|---|---|
| 001 | EFF-001[1] | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds or Mark West Creek. |
| 002 | EFF-002 | Tertiary treated, disinfected wastewater before effluent contacts the receiving water. |
| 001 | REC-001[1] | Tertiary treated, disinfected wastewater immediately following the UV disinfection process before discharge to the Permittee's effluent storage ponds, from which discharges occur to the recycled water system <u>at distribution locations 003a, 003B, 004 and 005</u>. |
| -- | RSW-001 | Mark West Creek surface water upstream beyond the influence of the discharge. |

Table Notes:

1. Monitoring Locations EFF-001 and REC-001 are the same location, the sampling point immediately following the UV disinfection system. Different monitoring location names have been assigned due to differences in monitoring requirements at Monitoring Location EFF-001 and Monitoring Location REC-001 (during periods of discharge to the recycled water system). The Permittee has the ability to discharge directly to the recycled water distribution system and bypass the storage ponds.

**Comment 14: Page E-4, Table E-2**

Attachment E, Section III (Table E-2): Change Footnote 6 on Table E-2. Influent Monitoring – Monitoring Location INF-001. The required sampling frequency for CTR priority pollutants is listed as "annually" in the table but is referenced as quarterly in the footnote. Revise Attachment E.III, Table E-2, Footnote 6 to read as follows:

Influent monitoring shall consist of a full CTR priority pollutant scan during the first year of the permit term with ~~quarterly~~ annual samples analyzed for those pollutants detected in the scan.

***Response 14:*** *Table note 6 in Table E-2 on page E-4 of the Proposed Permit has modified as follows.*

*6. Influent monitoring shall consist of a full CTR priority pollutant scan during the first year of the permit term with ~~quarterly~~ annual samples analyzed for those pollutants detected in the scan.*

**Comment 15: Page E-4, Table E-3**

Attachment E, Section IV.A (Table E-3): Change Footnote 5 on Table E-3. Effluent Monitoring – Monitoring Location EFF-001. Footnote regarding analytical methods should reference 40 CFR 136 instead of 40 CFR 135. Revise Attachment E.IV.A Table E-3, Footnote 5 to read as follows:

The Permittee shall collect and analyze samples from each operational UV disinfection channel for total coliform bacteria and E. coli. MPN and CFU are comparable units. The Permittee may use any E. coli method specified in ~~40 CFR 135~~ 40 CFR 136 for compliance monitoring for E. coli.

***Response 15:*** *Footnote 5 in Table E-3 of the Proposed Permit has been modified as follows.*

*The Permittee shall collect and analyze samples from each operational UV disinfection channel for total coliform bacteria and E. coli. MPN and CFU are comparable units. The*

*Permittee may use any E. coli method specified in ~~40 CFR 135~~ 40 CFR 136 for compliance monitoring for E. coli.*

**Comment 16: Page E-6, Table E-4**

Attachment E, Section IV.B (Table E-4): Table E-4. Effluent Monitoring – Monitoring location EFF-002: Change chronic toxicity sample type from 24-hour composite sample to grab sample. The District has historically collected grab samples at EFF-002 and does not currently have the capability of collecting a composite sample at this location.

**Excerpt from Table E-4. Effluent Monitoring – Monitoring location EFF-002**

| Parameter | Units | Sample Type | Minimum Sampling Frequency | Required Analytical Test Method |
|---|---|---|---|---|
| Acute Toxicity[12] | % Survival, Pass or Fail, and % Effect | Grab | Once per Discharge Season | See Section V.A Below |
| Chronic Toxicity[12] | Pass or Fail, and % Effect | ~~24-hr Composite~~ Grab | Once per Discharge Season | See Section V.B Below |

***Response 16:*** *Staff agrees that grab samples would be representative of the treated wastewater held in the storage ponds because the storage ponds essentially composite the wastewater before sampling. However, if the Permittee is discharging directly from the UV channel, then a 24-hour composite sample is required.*

*Page E-6, Table E-4 of the Proposed Permit has been modified as follows.*

| ***Parameter*** | ***Units*** | ***Sample Type*** | ***Minimum Sampling Frequency*** | ***Required Analytical Test Method*** |
|---|---|---|---|---|
| *Acute Toxicity[12]* | *% Survival, Pass or Fail, and % Effect* | *Grab* | *Once per Discharge Season* | *See Section V.A Below* |
| *Chronic Toxicity[12]* | *Pass or Fail, and % Effect* | *~~24-hr Composite~~ Grab* | *Once per Discharge Season* | *See Section V.B Below* |

*Table Notes:*

*13. If the Permittee is discharging directly from the UV channel, a 24-hour composite sample is required to be collected. If the Permittee is discharging strictly from the storage ponds, a grab sample may be collected.*

**Comment 17: Page E-5, Table E-4**

Attachment E, Section IV.B (Table E-4): Table E-4. Effluent Monitoring – Monitoring Location EFF-002: Change dissolved oxygen and temperature sample type from continuous to grab since this is taken as grab sample under the existing permit, and the sample location is not currently set-up for continuous monitoring.

**Excerpt from Table E-4. Effluent Monitoring – Monitoring location EFF-002**

| Parameter | Units | Sample Type | Minimum Sampling Frequency | Required Analytical Test Method |
|---|---|---|---|---|
| pH | standard units | Grab | Five Times per Week[2,3] | Part 136[4] |
| Dissolved Oxygen | mg/L | ~~Continuous~~ Grab | Five Times per Week | Part 136[4] |
| Temperature | °F | ~~Continuous~~ Grab | Five Times per Week[3] | Part 136[4] |
| Cyanide, Total (as CN) | µg/L | Grab | Monthly[5] | Part 136[4,6] |

***Response 17:*** *To assure quality DO data is collected during the life of the Proposed Permit and to determine compliance with the Basin Plan DO objective (Response 4), the Permittee will need to monitor temperature and DO continuously. No changes have been made to the Proposed Permit in response to Comment 17.*

**Comment 18: Page E-9, Section V.B.6.a. of the MRP**

Attachment E, Section V.B.6.a: The second sentence of the Section states the null hypothesis for the TST, but the definition is missing a colon and the less-than-or-equal-to character. The statement should read:

"The null hypothesis ($H_0$) for the TST approach is: Mean discharge IWC response ≤ 0.75 x Mean control response.

***Response 18:*** *Section V.B.6.a. on page E-10 of the Proposed Permit has been modified as follows.*

*The discharge is subject to determination of "Pass" or "Fail" and "Percent (%) Effect" for chronic toxicity tests using the TST approach described in National Pollutant Discharge Elimination System Test of Significant Toxicity Implementation Document (EPA 833-R10-003, 2010), Appendix A, Figure A-1, and Table A-1. The null hypothesis (Ho) for the TST approach is Mean discharge IWC response ≦ 0.75 × Mean control response. A test result that rejects this null hypothesis is reported as "Pass". A test result that does not reject this null hypothesis is reported as "Fail". The relative "Percent (%) Effect" at the discharge IWC is defined and reported as: ((Mean control response – Mean discharge IWC response) ÷ Mean control response)) × 100.*

**Comment 19: Page E-11, Section V.B.8. of the MRP**

Attachment E, Section V.B.8: Accelerated monitoring requirements.

a. Add the following sentence at the end of Section V B. as follows:

"If the discharge stops before additional samples can be collected, the Permittee shall contact the Executive Officer within 21 days with a plan to demonstrate compliance with the effluent limitation."

***Response 19:*** *Section V.B.8. on page E-11 of the Proposed Permit has been modified as follows.*

***Accelerated Monitoring Requirements.*** *Accelerated monitoring for chronic toxicity is triggered when a chronic toxicity test, analyzed using the TST approach, results in "Fail" and the "Percent Effect" is ≥0.50. Within 24 hours of the time the Permittee becomes aware of a summary result of "Fail", the Permittee shall implement an accelerated monitoring schedule consisting of four toxicity tests—consisting of 5-effluent concentrations (including the discharge IWC) and a control—conducted at approximately 2-week intervals, over an 8-week period. If each of the accelerated toxicity tests results is "Pass," the Permittee shall return to routine monitoring for the next monitoring period. If one of the accelerated toxicity tests results is "Fail", the Permittee shall immediately implement the TRE Process conditions set forth in section V.C, below. <u>If the discharge stops before additional samples can be collected, the Permittee shall contact the Executive Officer within 21 days with a plan to demonstrate compliance with the effluent limitation.</u>*

**Comment 20: Pages E-7 and E-9, Sections V.A.5 and V.B.5 of the MRP**

Attachment E, Section V.A.5 and V.B.5: The Tentative Order directs the District to perform a round of species sensitivity tests with all acute freshwater test species (Ceriodaphnia dubia and Pimephales promelas) and all chronic freshwater test species (C. dubia, P. promelas, and Selenastrum capricornutum) during the first round of routine

compliance testing. The District contests that conducting a round of species sensitivity testing is unnecessary because the data needed to identify the sensitive test species are already available and they are recent. The District currently conducts all of the testing required for the species sensitivity testing annually. Since the data needed to make the sensitive species determination is currently available, the District requests that the Tentative Order be amended to allow for use of historical data for this purpose.

Proposed edits to Footnote 2 on p. E-7 are as follows:

[2] If the Discharger conducted the testing required to make a sensitive species determination during the previous permit term, the most recent test results may be used in lieu of conducting a new round of species sensitive testing. If the percent effect is equal to zero percent effect for each species, or all percent effect are the same value, in the species sensitivity test, the Permittee shall either use the species that was most sensitive during the previous permit term for routine monitoring or repeat the species sensitivity screening for all species to confirm the results of the first screening before selecting the most sensitive species to use for routine monitoring. If two consecutive species sensitivity screening tests demonstrate that the percent effect for all species exhibit less than or equal to zero percent, the Permittee may select the species to be used for routine monitoring during the permit term.

Proposed edits to Footnote 4 on p. E-10 are as follows:

[4] If the Discharger conducted the testing required to make a sensitive species determination during the previous permit term, the most recent test results may be used in lieu of conducting a new round of species sensitive testing. If the percent effect is less than or equal to zero percent effect for each species, or all percent effect are the same value, in the species sensitivity screening test, the Permittee shall either use the species that was most sensitive during the previous permit term for routine monitoring or repeat the species sensitivity screening for all species to confirm the results of the first screening before selecting the most sensitive species to use for routine monitoring. If two consecutive species sensitivity screening tests demonstrate that the percent effect for all species exhibit less than or equal to zero percent, the Permittee may select the species to be used for routine monitoring during the permit term.

***Response 20:*** *Footnote 2 on page E-8 and Footnote 4 on page E-11 of the Proposed Permit has been modified as follows.*

*Species sensitivity screening generated within five years prior to issuance of this Order may be used when the data is representative of the effluent and the species sensitivity screening is conducted in accordance with section V.B.4 of the MRP in this Order.*

**Comment 21: Page E-13, Section V.C.2 of the MRP**

Attachment E, Section V.C.2: Section requires that if a TRE is initiated, that it initially be done so in compliance with guidance that is applicable to industrial facilities, not

POTWs. Thereafter, the District is to submit a Detailed TRE Work Plan. It is not appropriate for POTWs to follow TRE guidance prepared by USEPA specifically for industrial facilities, and it is not necessary since the TO has the District prepare in advance of triggering a TRE. That is, the Permit requires that the District maintain a current Generic TRE Work Plan (p. E-13, Item C.1), regardless of whether the facility is in a TRE. It is appropriate for initial TRE activities to be guided by the Generic TRE Work Plan, rather than USEPA industrial TRE guidance, until a Detailed TRE Work Plan is prepared. We request the following changes to the above referenced section.

2. **Preparation and Implementation of a Detailed TRE Work Plan.** If one of the accelerated toxicity tests described in section V.A.8 (above) does not comply with the three sample median minimum limitation (90 percent survival) or in section V.B.8 (above) results in "Fail", the Permittee shall immediately initiate a TRE using the District's generic TRE Work Plan (prepared under section V.C.1 of Attachment E) ~~EPA manual Generalized Methodology for Conducting Industrial Toxicity Reduction Evaluations (EPA/600/2-88/070, 1989)~~ and within 30 days of receipt submit the accelerated monitoring result to the Regional Water Board Executive Officer. The Permittee shall also submit a Detailed TRE Work Plan, which shall follow the generic TRE Work Plan revised as appropriate for the toxicity event described in section V.A.8 or V.B.8 of this MRP. The Detailed TRE Work Plan shall include the following information, and comply with additional conditions set by the Regional Water Board Executive Officer:

If the changes requested above are not accepted, then the District requests that the reference to USEPA's industrial TRE manual be removed and replaced with a reference to the USEPA (1999) Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants (EPA/833B-99/002).

***Response 21:*** *Page E-14, section V.C.2 of the Monitoring and Reporting Program (MRP) in the Proposed Permit has been modified as follows.*

2. ***Preparation and Implementation of a Detailed TRE Work Plan.*** *If one of the accelerated toxicity tests described in section V.A.8 (above) does not comply with the three sample median minimum limitation (90 percent survival) or in section V.B.8 (above) results in "Fail", the Permittee shall immediately initiate a TRE using USEPA (1999) Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants (EPA/833B-99/002) ~~EPA manual Generalized Methodology for Conducting Industrial Toxicity Reduction Evaluations (EPA/600/2-88/070, 1989)~~ and within 30 days of receipt submit the accelerated monitoring result to the Regional Water Board Executive Officer. The Permittee shall also submit a Detailed TRE Work Plan, which shall follow the generic TRE Work Plan revised as appropriate for the toxicity event described in section V.A.8 or V.B.8 of this MRP. The Detailed TRE Work Plan shall include the following information, and comply with additional conditions set by the Regional Water Board Executive Officer:*

**Comment 22: Page E-14, Section VII of the MRP**

Attachment E Section VII: The District is in the process of moving recycled water to the general statewide order. We would like to request that Attachment E, Section VII be stricken from the permit as the general order would take precedence over these requirements. If the North Coast RWQCB elects to not remove Attachment E, Section VII from the permit, we would like to request that monitoring data for this sample point be reported from the results of monitoring location EFF-001 to avoid duplication of sampling efforts from the same stream.

***Response 22:*** *Attachment E, Section VII includes Recycling Monitoring Requirements. Staff does not intend to establish dual requirements for recycled water. Enrollment under the State Water Resources Control Board Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order) includes coverage and monitoring requirements for recycled water distribution and use. The Recycled Water General Order does not cover monitoring requirements for the producer of recycled water. Monitoring requirements for the production and storage of recycled water is included in Attachment E, Section VII.*

*No changes to the Proposed Permit were made in response to Comment 22.*

**Comment 23: Page E-15, Section VIII.B of the MRP**

Attachment E Section VIII.B requires the District to submit a Salt and Nutrient Management Plan (SNMP) Groundwater Monitoring Work Plan by September 21, 2021. Section VIII.B states that the SNMP Groundwater Monitoring Work Plan "must include the specific components" identified in the Regional Water Board's written response to the City's SNMP dated September 1, 2015, which is included in the draft permit as Attachment J.

The Windsor Water District is part of a group of agencies that submitted an SNMP under the leadership of the City of Santa Rosa (City). The SNMP was approved by North Coast RWQCB staff as described in the Attachment J. City staff met with North Coast RWQCB staff on December 15, 2017 to review Attachment J and provide additional basis for preparation of a SNMP Monitoring and Reporting Plan (MRP). At the 2017 meeting, North Coast RWQCB staff revised the written input in Attachment J, including that related to monitoring frequency, well location, and water quality constituents to be monitored, in light of information presented at the meeting. The City has recently submitted SNMP MRP dated December 2019 that reflects this revised North Coast RWQCB input. The City-submitted SNMP MRP represents the District's submittal in fulfillment of the SNMP Groundwater Monitoring Work Plan submittal requirement as stated in the draft permit. The District therefore requests the following changes to the permit:

• Delete Attachment J from the permit; and

• Modify Attachment E Section VIII.B as follows:

"By August 1, 2021, the Permittee shall submit a Salt and Nutrient Management Plan (SNMP) Groundwater Monitoring and Reporting Work Plan to the Regional Water Board for Executive Officer approval that describes the Permittee's plan and schedule for developing a monitoring and reporting program to assess the impacts of storage ponds and recycled water use on the water quality of the underlying groundwater basin. ~~The Work Plan must include the specific components identified in the September 1, 2015 Regional Water Board letter to the City of Santa Rosa (Subject line: Santa Rosa Plain Salt and Nutrient Management Plan) describing the Necessary Components of a Basin-Specific Monitoring and Reporting Program, including the following components: Basin/Watershed Characterization and Baseline, Monitoring Well Installation Work Plan, Sampling Design Plan, Primary Constituents of Concern, Sampling Frequency, Quality Assurance Project Plan, and Reporting. This letter is included as Attachment J to this Order.~~"

***Response 23:*** *Staff acknowledges that the Permittee submitted a Santa Rosa Sub-basin [Groundwater] Monitoring and Reporting Plan on April 24, 2020. The City's submittal of this Plan satisfies the work plan requirement identified in MRP section VIII.B, therefore the proposed underline/strikeout revisions to the Draft Permit are appropriate. Staff will provide comments on the Plan to the Permittee upon completion of that review. Staff does not see the need to delete the last sentence of MRP section VIII.B as that sentence describes important information that Staff is looking for in the SNMP Groundwater Monitoring and Reporting Plan. All issues raised in 2015 are still applicable and were not modified following the December 2017 meeting mentioned in the Permittee's comment.*

*MRP section VIII.B. has been modified to read as follows:*

*"By August 1, 2021, the Permittee shall submit a Salt and Nutrient Management Plan (SNMP) Groundwater Monitoring <u>and Reporting</u> ~~Work~~ Plan to the Regional Water Board for Executive Officer approval that describes the Permittee's plan and schedule for developing a monitoring and reporting program to assess the impacts of storage ponds and recycled water use on the water quality of the underlying groundwater basin. The Plan must include specific components identified in the September 1, 2015 Regional Water Board letter to the Permittee (Subject line: Santa Rosa Plain Salt and Nutrient Management Plan) describing the necessary components of a basin-specific Monitoring and Reporting Program, including the following components: . . . Quality Assurance Project Plan, and Reporting. This letter is included as Attachment J to this Order."*

*"<u>Upon approval of the SNMP Groundwater Monitoring and Reporting Plan by the Regional Water Board Executive Officer, the Permittee shall implement the Plan per the approved schedule of implementation."</u>*

*Attachment J has been retained in the Proposed Permit.*

**Comment 24: Page E-18, Section IX.B of the MRP**

Attachment E., Section IX.B: The actual approved flow rate per UV channel is 5.1 MGD and 10.1 MGD for 2 channels based on the UV Disinfection Engineering Report (Brelje & Race, 2002). We would like to request that Section E.IX.B.1.b be revised to read:

b. Compliance. The UV transmittance shall not fall below 55 percent of maximum at any time, unless otherwise approved by DDW. The operational UV dose shall not fall below 100 millijoules per square centimeter (mJ/cm2) at any time, unless otherwise approved by DDW. Any inadequately treated and disinfected wastewater shall be diverted to a storage basin or an upstream process for adequate treatment. Flow through the UV disinfection system shall not exceed 2.25 mgd as a daily average and ~~3.75~~ 5.1 mgd as a monthly maximum per UV channel, unless otherwise approved by DDW.

***Response 24:*** *Page E-17, section IX.B. of the MRP in the Proposed Permit has been modified as requested in Comment 24.*

**Comment 25: Page E-18, Section IX.D. of the MRP**

Attachment E, Section IX.D: Requires a Biosolids log that is not appropriate for the reclamation facility's short-term processing (6-8 weeks per year). The reclamation facility maintains sampling and hauling records for biosolids processed during this time period, which are submitted with the annual biosolids report, and requests that this requirement for a log be removed.

***Response 25:*** *Section IX.D.2. on page E-18 of the MRP in the Proposed Permit states the following:*

*"Sampling records shall be retained for a minimum of 5 years. A log shall be maintained for sludge quantities generated and of handling and disposal activities. The frequency of entries is discretionary; however, the log must be complete enough to serve as a basis for developing the Sludge Handling and Disposal report that is required as part of the Annual Report."*

*In addition, the Sludge Handling and Disposal Activity Reporting requirement on Page E-24 of the MRP in the Proposed Permit requires the Permittee to submit, as part of its annual report to the Regional Water Board, a description of the Permittee's solids handling, disposal and reuse activities over the previous 12 months.*

*Since the Permittee is required to submit, as part of their annual report, the annual sludge production and the methods of final sludge disposal, then the creation of a log to document these activities is a necessary requirement to ensure accurate information is submitted as part of the annual report. The requirement to log sludge quantities generated and of the handling and disposal activities is retained in the Proposed Permit.*

*No changes were made in response to Comment 25.*

**Comment 26: Page E-24, Section X.D.2.i. of the MRP**

Attachment E, Section X.D.2.i: Remove the requirement to include Sanitary System Reporting as part of the annual report to the Regional Water Board. The Permittee currently submits biennial updates to SSMP that include this information. Delete Section X.D.2.i from Attachment E in its entirety:

~~i. **Sanitary System Reporting.** The Permittee shall submit as part of the annual report to the Regional Water Board, a description of the Permittee's activities to correct deficiencies and reduce infiltration and inflow (I&I) into the collection system. The report shall include, but not be limited to the following:~~

~~i. A description of any assessment work to characterize the collection system and identify deficiencies;~~

~~ii. A description of replacement and rehabilitation of the collection system, including details about replaced/rehabilitated infrastructure, including pipeline, manholes, lift stations, etc.~~

~~iii. A description of any changes in the Permittee's ordinances and programs to address I&I.~~

~~iv. The financial resources spent on collection system assessment, rehabilitation, and repair work during the calendar year, and the amount of financial resources budgeted for the upcoming calendar year.~~

***Response 26:*** *The information provided as part of the Sanitary Sewer Management Plan (SSMP) can be submitted as part of the annual report to satisfy section X.D.2.i of the Proposed Permit.*

*No changes were made in response to Comment 26.*

**Comment 27: Page E-25, Section X.D.3. of the MRP**

Attachment E, Section X.D.3: Remove the requirement to provide demonstration of Vector Attraction Reduction for biosolids as this data is captured and included in existing Class B biosolids reporting procedures. Revise Section X.D.3 to read as follows:

3. **Annual Biosolids Reporting.** ~~The permittee shall include with their report the following demonstration of Vector Attraction Reduction: either a) certification from the person who land applied the biosolids that it was incorporated within 6 hours of arriving at the application site, or b) calculations demonstrating at least a 38% reduction in volatile solids during the treatment process.~~

The Permittee shall electronically certify and submit an annual biosolids report to U.S. EPA by February 19 each year using U.S EPA's Central Data Exchange (CDX) Web Site (https://cdx.epa.gov/). Information regarding registration and use of U.S. EPA's CDX system is also available at the Web Site.

***Response 27:*** *40 CFR part 503.33 includes requirements for vector attraction reduction. Specifically, 40 CFR part 503.33(b)(1) states "The mass of volatile solids in the sewage sludge shall be reduced by a minimum of 38 percent (see calculation procedures in "Environmental Regulations and Technology—Control of Pathogens and Vector Attraction in Sewage Sludge", EPA-625/R-92/013, 1992, U.S. Environmental Protection Agency, Cincinnati, Ohio 45268)."*

*Additionally, 40 CFR part 503.33(b)(10) states "Sewage sludge applied to the land surface or placed on an active sewage sludge unit shall be incorporated into the soil within six hours after application to or placement on the land, unless otherwise specified by the permitting authority."*

*The language is retained to ensure that vector attraction reduction is accomplished either by applying biosolids quickly enough to reduce the attraction of vectors or by demonstrating that the volatile solids has been reduced enough through treatment to reduce the spread of pollutants by vectors.*

*No changes have been made to the Proposed Permit as a result of Comment 27.*

**Comment 28: Page E-25, Section X.D.4 of the MRP**

Attachment E, Section X.D.4: If requirement to submit Annual Volumetric Reports is maintained, request that report due date be changed to April 30 in order to be aligned with guidance documents and GeoTracker. If proposed date change is accepted, the new due date should also be reflected in Table E-8. Revise Section X.D.4 from Attachment E to read as follows:

**4. Annual Volumetric Reporting.** The Permittee shall electronically certify and submit an annual volumetric report, containing monthly data in electronic format, to State Water Board's GeoTracker system by ~~March 1~~ April 30 of the following year. Required data shall be submitted to the GeoTracker database under a site-specific global identification number. The Permittee shall report in accordance with each of the items in Section 3 of the Recycled Water Policy as described below:

**Excerpt of Table E-8. Reporting Requirements for Special Provisions Reports**

| Order Section | Special Provision Requirement | Reporting Requirements |
|---|---|---|
| MRP Reporting Requirement X.D.3 | Annual Biosolids Report to EPA | **February 19, annually** |
| MRP Reporting Requirement X.D.4 | Annual Volumetric Reporting to Geotracker | **~~March 1~~ April 30, annually** |
| MRP Reporting Requirement X.D.5 | Discharge Season Annual Report | **July 1 annually** |

***Response 28:*** *Section X.D.4 on page E-26 of the Proposed Permit has been modified as follows:*

***4. Annual Volumetric Reporting.*** *The Permittee shall electronically certify and submit an annual volumetric report, containing monthly data in electronic format, to State Water Board's GeoTracker system by ~~March 1~~ April 30 of the following year. Required data shall be submitted to the GeoTracker database under a site-specific global identification number.*

*Table E-8 on page E-21 of the Proposed Permit has been modified as follows:*

| ***Order Section*** | ***Special Provision Requirement*** | ***Reporting Requirements*** |
|---|---|---|
| *MRP Reporting Requirement X.D.3* | *Annual Biosolids Report to EPA* | ***February 19, annually*** |
| *MRP Reporting Requirement X.D.4* | *Annual Volumetric Reporting to Geotracker* | ***~~March 1~~ April 30, annually*** |
| *MRP Reporting Requirement X.D.5* | *Discharge Season Annual Report* | ***July 1 annually*** |

**Comment 29: Page E-26, Section X.D.5.b. of the MRP**

Attachment E, Section X.D: Request to remove the requirement to provide annual phosphorus effluent limitation report as part of the annual report to the North Coast RWQCB. The Permittee currently submits an annual phosphorus compliance report due on October 1. Delete E.X.D.5.b in its entirety.

5. Discharge Season Annual Report. By July 1 of each year, the Permittee shall submit an annual report to the Regional Water Board for the prior discharge season through the CIWQS Program Web site and certify the report as required by Standard Provisions of this Order (Attachment D, section V.B). In the event that an alternate method for submittal of the annual report is required, the Permittee shall submit the report electronically via the email address in section X.B.6.c., above. The report shall, at a minimum, include the following:

a. Discharge Management Reporting. The Permittee shall submit a report documenting that storage and discharges were managed pursuant to the most current Regional Water Board Executive Officer approved Discharge Management Plan to demonstrate that the Permittee maximized reclamation and minimized discharges to surface waters.

~~b. Phosphorus Effluent Limitation Compliance Reporting. The Permittee shall submit a report documenting compliance with phosphorus effluent limitations as follows:~~

~~i. If the Permittee opts to utilize the Laguna WQTF identified in section VII.O.1 of the Order, as a means of compliance, the annual reports must include sufficient documentation to demonstrate that the water quality credits used were appropriately certified under the Laguna WQTF and were sufficient to meet effluent limitations. In addition, the Permittee must include total gallons discharged, phosphorous concentration, discharge location, and days of discharge. All phosphorus discharged and any credits generated used shall be tracked in the WQTF Accounting Ledger which is available on the Regional Water Board's Nutrient Offset Program Website.~~

~~ii. If the Permittee opts to utilize the ACO identified in section VII.O.2 of the Order, as a means of compliance, the annual reports must show compliance with all compliance dates in Order section VII.O.2, the submitted ACO Workplan, and all deadlines specified therein. In addition, the Permittee must include total gallons discharged, phosphorous concentration, discharge location, and days of discharge. All phosphorus discharged and any credits generated used shall be tracked in the WQTF Accounting Ledger which is available on the Regional Water Board's Nutrient Offset Program Website noted in 6.b, immediately above.~~

***Response 29:*** *Staff recognize that this dual reporting language would require the Permittee to submit a report annually on July 1 and October 1. Therefore, page E-26, section X.D.5.b of the MRP in the Proposed Permit has been removed as requested, eliminating the requirement to submit a report documenting phosphorus compliance on July 1 of each year.*

**Comment 30: Page E-27, Section X.E.2. of the MRP**

Attachment E, Section X.E.2: Request to remove the requirement to provide a Public Spill Notification Plan by 12/2020. The Permittee maintains a SSMP and requests that this document be used in its place. Delete E.X.E.2 in its entirety.

~~**2. Public Spill Notification Plan.** By December 1, 2020, the Permittee shall submit a public spill notification plan for Executive Officer approval, describing the Permittee's plans and procedures for timely notification of community members that are or may be impacted by spills, Category 1 sanitary sewer overflows in excess of 50,000 gallons, and unauthorized discharges that may occur. The public spill notification plan must demonstrate that adequate plans and procedures are in place to ensure that the immediate community members (i.e., residents in the immediate area of the spill) and any downstream community members that may be affected by spills that reach surface waters are properly notified. The public spill notification plan must demonstrate that methods of communication with the public are appropriate for the type and conditions of the spill.~~

***Response 30:*** *Regional Water Board staff have considered the Permittee's comment carefully and have determined that it is appropriate to remove the public spill notification plan requirement from the permit at this time. Staff recognize that this is a region wide issue and that additional examination of the regulatory authority to impose these requirements is appropriate. Regional Water Board staff are committed to continued work toward developing a mechanism to require public spill notification.*

*Staff agree that spill notification related to sanitary sewer overflows is addressed through the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems, WQ Order No. 2006-0003 (SSS WDRs). The SSS WDRs allows spill notification requirements to be consistently applied to all collection systems enrolled under the statewide order. The State Water Board is in the process of revising the SSS WDRs for future State Board adoption. Staff have requested that the revision of the SSS WDRs address public notification of spills more explicitly than it currently does. If this requirement is not included in the State Water Board's current effort to revise the SSS WDRs, a Region 1 specific mechanism may need to be developed.*

*The current SSS WDR requires each enrolled collection system to have a Sewer System Management Plan (SSMP). The Permittee's SSMP includes section 6.9 Public Notification. Section 6.9 of the Permittee's SSMP states:*

*"Post signs and place barricades to keep vehicles and pedestrians away from contact with spilled sewage. Do not remove the signs until directed by the Utility Systems Superintendent."*

*"Creeks and streams that have been contaminated as a result of an SSO should have signs posted at visible access locations until the risk of exposure has subsided to acceptable background levels. The warning signs should be checked every day to ensure that they are still in place."*

*"In the event that an overflow occurs at night, the location should also be inspected the following day. The Maintenance Worker should look for any signs of sewage solids and sewage-related material that may warrant additional cleanup activities."*

*"Major spills may warrant broader public notice. The Public Works Director/Town Engineer will obtain authorization from the Town Manager to contact or communicate with local media when significant areas may have been contaminated by sewage."*

*"Reporting requirements stipulate that for any discharge of sewage greater than 1,000 gallons that results in a discharge to a drainage channel or surface water that was not fully captured, the Town shall notify the State Office of Emergency Services as soon as possible, but not later than 2 hours after becoming aware of the discharge. In addition, the Town must confirm this notification within 24 hours after becoming aware of the discharge. The confirmation must be made to the Regional Water Quality Control Board."*

*Staff re-iterate the desire to continue working with the Permittee and local health agencies on enhanced public notification procedures to better inform the public in the event of wastewater spills and unauthorized discharges that pose an immediate threat to public health.*

*The SSMP is required to be updated regularly. Staff has reviewed the Permittee's Public Notification section in their SSMP and concluded that it meets the requirement set for in the Public Spill Notification Plan. The Permittee's current SSMP addresses the public notification procedures that were addressed in the MRP section X.E.2 of the Draft Permit. Therefore, section X.E.2. of the MRP has been removed from the Proposed Permit.*

*The public spill notification plan requirement that was included in section X.E.2 of the Draft Permit has been removed from the Proposed Permit. In addition, section X.E.3 of the Draft Permit (now section X.E.2 of the Proposed Permit) has been modified to remove the reference to the Public Spill Notification Plan and reads: "Sanitary Sewer Overflows. Notification and reporting of sanitary sewer overflows are conducted in accordance with the requirements of Order No. 2006-0003-DWQ (Statewide General WDRs for Sanitary Sewer Systems), which is not incorporated herein by reference, and any revisions thereto, except as provided for in an approved Public Spill Notification Plan.*

**Comment 31: Page F-6, Section II.A.4 of the Fact Sheet**

Attachment F, Section II.A.4: Request to revise language removing Keiser Park toilet flushing facilities from consideration. The toilets at Keiser Park do not use recycled water. Also, request to update equivalent acreage to 501 acres from 552 acres based on findings from the most recent engineering report update. Revise Attachment F.II.A.4 to read as follows:

**4. Recycled Water**

During the discharge prohibition season from May 15 through September 30, advanced treated wastewater is recycled. Recycled water is supplied for irrigation of rural pasture,

crops, and vineyards and for landscaping at the Windsor Golf Course and in-town parks, playgrounds, commercial facilities, and residential properties. Recycled water is also supplied for toilet flushing at several locations, including Windsor High School, ~~Keiser Park~~, and Fire Station No. 2. In addition, recycled water is delivered to the City of Santa Rosa Geysers Recharge project pipeline where it is used for recharge of the Geysers steamfields to enhance steam production for electrical energy generation.

Currently, the Permittee's reclamation system includes 701 irrigated acres (1,429 total acres) that yields ~~552~~ 501 equivalent acres. In addition, the Permittee currently discharges 0.53 mgd to the Geyser's Recharge project pipeline but has the capability of increasing to 0.75 mgd under its contract with the City of Santa Rosa.

***Response 31:*** *Page F-5, section II.A.4. of the Fact Sheet in the Proposed Permit has been modified as follows:*

*During the discharge prohibition season from May 15 through September 30, advanced treated wastewater is recycled. Recycled water is supplied for irrigation of rural pasture, crops, and vineyards and for landscaping at the Windsor Golf Course and in-town parks, playgrounds, commercial facilities, and residential properties. Recycled water is also supplied for toilet flushing at several locations, including Windsor High School, ~~Keiser Park~~, and Fire Station No. 2. In addition, recycled water is delivered to the City of Santa Rosa Geysers Recharge project pipeline where it is used for recharge of the Geysers steamfields to enhance steam production for electrical energy generation.*

*Currently, the Permittee's reclamation system includes 701 irrigated acres (1,429 total acres) that yields ~~552~~ 501 equivalent acres. In addition, the Permittee currently discharges 0.53 mgd to the Geyser's Recharge project pipeline but has the capability of increasing to 0.75 mgd under its contract with the City of Santa Rosa.*

**Comment 32: Page F-7, Section II.B.3. of the Fact Sheet**

Attachment F, Section II: Remove references to specific locations that have been removed as locations by this permit. Revise Attachment F.II.B.3 to read as follows:

3. During the dry weather season (May 15 to September 30), and other periods as allowed under this Order, advanced treated wastewater from effluent storage may be recycled for irrigation on authorized use sites at Discharge Point 003A, ~~for landscape irrigation and toilet flushing at Windsor High School at Discharge Point 003B~~, and for recharge at the Geysers Recharge Project at Discharge Point 004, and for distribution as part of the planned Joint Use Program at Discharge Point 005. This Order includes requirements that apply to the production of recycled water at the Facility.

***Response 32:*** *See Response 2. No changes were made to the Proposed Permit in response to Comment 32.*

**Comment 33: Page F-8, Section II.E.2. of the Fact Sheet**

Attachment F, Section II.E.2: The Permittee only plans to pursue power for aeration blowers. Delete Section II.E.2 from Attachment F in its entirety:

~~2. Increase standby power in 2019 to provide sufficient power for the aeration blowers and effluent pumps during power outages.~~

***Response 33:*** *Section II.E.2 on page F-8 of the Fact Sheet has been removed from the Proposed Permit as requested.*

**Comment 34: Page F-11, Table F-4**

Revise Attachment F, Table F-4 to read as follows:Table F-2. Basin Plan Beneficial Uses

| Discharge Point | Receiving Water Name | Beneficial Use(s) |
|---|---|---|
| 002 | Mark West Creek within the Mark West Hydrologic Subarea of the Middle Russian River Hydrologic Area | <u>Existing:</u><br>Municipal and domestic supply (MUN);<br>Agricultural supply (AGR);<br>Industrial service supply (IND);<br>Groundwater recharge (GWR);<br>Freshwater replenishment (FRSH);<br>Navigation (NAV);<br>Water contact recreation (REC-1);<br>Non-contact water recreation (REC-2);<br>Commercial and sport fishing (COMM);<br>Warm Freshwater Habitat (WARM);<br>Cold freshwater habitat (COLD);<br>Wildlife habitat (WILD);<br>Rare, threatened, or endangered species (RARE);<br>Migration of aquatic organisms (MIGR);<br>Spawning, reproduction, and/or early development (SPWN);<br>Water Quality Enhancement (WQE);<br>Wetland Habitat (WET);<br>Flood Attenuation (FLD); and<br>Subsistence Fishing (FISH).<br><u>Potential:</u><br>Industrial process supply (PRO);<br>Hydropower generation (POW);<br>Shellfish Harvesting (SHELL), and<br>Aquaculture (AQUA). |

| Discharge Point | Receiving Water Name | Beneficial Use(s) |
|---|---|---|
| 001, 003A, ~~003B,~~ 004 and 005 | Groundwater | Existing:<br>Municipal and domestic supply (MUN);<br>Agricultural supply (AGR);<br>Industrial service supply (IND); and<br>Native American Culture (CUL).<br><br>Potential<br>Industrial Process Supply (PRO); and<br>Aquaculture (AQUA). |

***Response 34:*** *Table F-2 in the Draft Permit links Discharge Points to the Beneficial Uses listed in the Basin Plan. Distribution Locations 003A, 003B, 004 and 005 are included in the Proposed Permit for informational purposes only. The Permittee has two Discharge Points (Discharge Point 001 and Discharge Point 002) as listed in Table E-1 of the Proposed Permit. Discharge Point 001 includes Monitoring locations EFF-001 and REC-001 to differentiate when the Permittee is discharging to the recycled water storage ponds and when water is being sent to the recycled water distribution system.*

*Since the Distribution Locations listed above will be covered under the Permittee's enrollment under the RWGO, Table F-2 has been modified to remove distribution locations 003A, 003B, 004 and 005 from the Proposed Permit.*

**Comment 35: Page F-37, Section IV.C.3.c. of the Fact Sheet**

Attachment F, Section IV.C.3.c: District requests that the North Coast RWQCB remove the effluent limitation for cyanide and require additional monitoring and a provisional study to investigate interferences in cyanide measurements and identify a reliable analytical method. The basis for this request is that cyanide measurements are prone to interference and thus the sample results are likely not representative of effluent or ambient receiving water quality. Moreover, the North Coast RWQCB has the authority to require monitoring before issuing an effluent limitation when the available data are insufficient to determine that an effluent limitation is warranted. An example of this type of requirement was included in the 2017 NPDES Permit issued to the Linda County Water District by the Central Valley Regional Board.

Section 1.2 of the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (State Implementation Plan or SIP) states: "The RWQCB shall have discretion to consider if any data are inappropriate or insufficient for use in implementing this Policy. Instances where such consideration is warranted include, but are not limited to, the following: evidence that a sample has been erroneously reported or is not representative of effluent or ambient receiving water quality; questionable quality control/quality assurance practices; and varying seasonal conditions."

Step 8, Section 1.3 of the SIP states: “If data are unavailable or insufficient, as described in section 1.2, to conduct the above analysis for the pollutant, or if all reported detection limits of the pollutant in the effluent are greater than or equal to the C value, the RWQCB shall require additional monitoring for the pollutant in place of a water quality-based effluent limitation. Upon completion of the required monitoring, the RWQCB shall use the gathered data to conduct the analysis in Steps 1 through 7 above and determine if a water quality-based effluent limitation is required. If, upon completion of the monitoring required by Step 8 and the subsequent analysis in Steps 1 through 7, a specific pollutant was not detected in any effluent or if ambient background sample and applicable detection limits are greater than or equal to the C value, the RWQCB may require periodic monitoring of the pollutant.”

The District would like to request the following:

Remove the effluent limitation for cyanide and require additional monitoring and a provisional study to investigate interferences in cyanide measurements and identify a reliable analytical method. The basis for this request is that there is evidence that cyanide measurements are prone to interference and thus the sample results are likely not representative of effluent or ambient receiving water quality. Moreover, the Regional Water Board has the authority to require monitoring before issuing an effluent limitation when the available data are insufficient to determine that an effluent limitation is warranted, such as in Yuba City’s 2017 NPDES permit.

A white paper drafted describing interferences of cyanide preservation in wastewater is provided in Attachment B of the Permittee’s comment letter.

***Response: 35:*** *The CTR establishes a water quality objective for the protection of freshwater aquatic life of 5.2 µg/L for cyanide. The Permittee collected five samples of the effluent and five samples of the receiving water and had each sample analyzed for cyanide during the term of Order No. R1-2013-0042. Cyanide was detected in the effluent in one of the five effluent samples, with four results of non-detect and one sample of 5.6 µg/L. Cyanide was also detected in two of the five receiving water samples, with three results of non-detect and two samples of 3.5 µg/L and 6.7 µg/L.*

*A determination of reasonable potential has been made based on the MEC of 5.6 µg/L and background concentration of 6.7 µg/L exceeding the most stringent water quality objective of 5.2 µg/L. This Order gives the Permittee the option to analyze for cyanide as total or weak acid dissociable cyanide using protocols specified in 40 C.F.R. Part 136, or an equivalent method in the latest Standard Method edition.*

*Neither the cover letter submitted with the cyanide data nor the lab sheets submitted for the 5.6 µg/L and 6.7 µg/L samples contained a mention interference of sodium hydroxide as brought up in the Permittee’s white paper. The 2017 NPDES Permit issued to the Linda County Water District by the Central Valley Regional Board cited in Comment 35 above includes a Cyanide Study to “study whether the chlorination/dechlorination of effluent produces compounds that interfere with the*

*cyanide laboratory analysis that create false positives and/or whether cyanides are released in the treatment process." The Permittee uses UV for disinfection and does not use chlorination/dechlorination for disinfection.*

*Staff maintain that the reasonable potential analysis was sound and based on the available data. Staff must assume that the data submitted to CIWQS as part of the Permittee's monthly reporting is representative of the discharge unless otherwise noted by the Permittee or the Permittee's lab of choice. The Proposed Permit gives the Permittee the option to analyze for cyanide as total or weak acid dissociable cyanide using protocols specified in 40 C.F.R. Part 136, or an equivalent method in the latest Standard Method edition. The Proposed Permit includes monthly monitoring for cyanide for compliance determination with the cyanide effluent limitation. Cyanide effluent limitations have been retained in the Proposed Permit to ensure that freshwater aquatic life is protected. No changes were made in response to Comment 35.*

**Comment 36: Page F-38, Section IV.C.3.c. of the Fact Sheet**

Attachment F, Section IV.C.3.c: The District would like to request that reasonable potential for lead be revisited. The CTR for lead includes hardness depend criteria. The hardness value that results in a reasonable potential was during an extreme wet weather event on February 13, 2019 where Creek flows during sampling event were approximately 2010 MGD and effluent discharge was 3.4 MGD. The receiving water hardness value on this day was 43 mg/L. At creek flows this high, the hardness will inevitably drop to levels lower than normal; however, the dilution factor is great enough such that the District's effluent would not have an impact on the lead concentration in the receiving water at that time because of the huge flow disparity. On February 13th, 2019, lead in effluent was 0.19 ug/L but would have needed to be greater than 63 ug/L for the discharge to have caused a 0.1 ug/L increase in the downstream lead concentration. The highest lead value reported in effluent during the period of record is 0.23 ug/L, which is 0.3 percent of the needed 63 ug/L. Such a value in effluent is not reasonably expected and so a finding of reasonable potential for lead is not appropriate.

***Response 36:*** *The CTR includes hardness-dependent criteria for the protection of freshwater aquatic life for lead. The criteria for lead are expressed in dissolved concentrations. U.S. EPA recommends conversion factors to translate dissolved concentrations to total concentrations. Using the worst-case measured hardness from the receiving water (43 mg/L) and the U.S. EPA recommended dissolved-total translator, the applicable chronic criterion (maximum 4-day average concentration) is 1.1 µg/L and the applicable acute criterion (maximum 1-hour average concentration) is 28 µg/L.*

*Lead was detected in four of the five receiving water samples during the term of Order No. R1-2013-0042, with results ranging from non-detect to 4.0 µg/L. Consistent with the Policy for Implementations of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (SIP), a determination of reasonable potential has*

*been made based on the background concentration of 4.0 µg/L exceeding the most stringent water quality objective of 1.1 µg/L and lead being detected in the effluent.*

*Dilution was not taken into account when determining reasonable potential for pollutants under the Permittee's previous permit because a mixing zone study was not completed. The Proposed Permit does include a mixing zone study reopener in the event that the Permittee submits a dilution/mixing zone study. The Proposed Permit also includes a Lead Impact Ratio to allow the Permittee to incorporate the hardness level at the time of the actual lead sample was taken.*

*Lead effluent limitations were retained in the Proposed Permit to ensure the protection of freshwater aquatic life. No changes have been made to the Proposed Permit based on Comment 36.*

**Comment 37: Page F-44, Section IV.C.5.c of the Fact Sheet**

Attachment F, Section IV.C.5.c: This section identifies the Instream Waste Concentration (IWC) of the discharge. It incorrectly states that the IWC applies to Discharge Point No. 001. Since the Whole Effluent Toxicity testing provisions apply to Discharge Point No. 002, it is appropriate to modify, as shown, the following sentences of this section:

"The chronic IWC (in % effluent) for Discharge Point 00~~1~~2 is 100%. The chronic toxicity trigger for Discharge Point 00~~1~~2 is expressed as a null hypothesis (H0)…"

***Response 37:*** *The Proposed Permit has been modified as requested in Comment 37 to properly reflect Discharge Point 002 as the compliance point.*

**Division of Drinking Water Comments**

The Division of Drinking Water (DDW) submitted comments on the Permittee's Title 22 Engineering Report acceptance letter on April 16, 2020. The Permittee submitted a response letter to the Regional Water Board on May 12, 2020. DDW's comments can be found below, with the Permittee's response to DDW Comment 2, 4 and 6 included directly after DDW's comment. Regional Water Board (RWB) Staff response follows DDW's comments where applicable.

**DDW Comment 1: Section IV.c.2.b**

Revise section IV.C.2.b to read "The Permittee shall comply with … Division of Drinking Water (DDW) regulations at title 22, sections 60301 – ~~60357~~60355 of the CCR (Water Recycling Criteria)."

***RWB Response DDW1:*** *Page 11, section IV.C.2.b. of the Proposed Permit has been modified as follows.*

*The Permittee shall comply with applicable state and local requirements regarding the production of recycled water, including requirements of Water Code sections 13500-13577 (Water Reclamation) and State Water Board, Division of Drinking Water (DDW) regulations at title 22, sections 60301 – 603557 of the CCR (Water Recycling Criteria).*

**DDW Comment 2:**

Revise section IV.D.2.b to read "Provide continuous, reliable monitoring of flow, UV transmittance, UV intensity, UV dose, and UV power at Monitoring Location INT-002, and turbidity at Monitoring Location INT-001B at all times. The Permittee must demonstrate compliance with the turbidity and UV dose requirement.

**Permittee Response DDW2:** The Town currently operates under continuous monitoring for flow, UV transmittance, UV intensity, UV dose and UV power at Monitoring Location INT-002, and monitors for turbidity at Monitoring Location INT-001B. The proposed language, however, could potentially be interpreted to mean continuous monitoring is required at these locations, even during conditions where recycled water is not being produced due to maintenance activities, unusual circumstances, etc. The Town would like to propose the following clarifying language to the proposed revisions in section IV.D.2.b: "Provide continuous, reliable monitoring of flow, UV transmittance, UV intensity, UV dose, and UV power at Monitoring Location INT-002, and turbidity at Monitoring Location INT-001B at all times of effluent production. The Permittee must demonstrate compliance with the turbidity and UV dose requirement**.**

***RWB Response DDW2:*** *Page 13, section IV.D.2.b of the Proposed Permit has been modified as follows.*

*Provide continuous, reliable monitoring of flow, UV transmittance, UV intensity, UV dose, and UV power at Monitoring Location INT-002, and turbidity at Monitoring Location INT-001B at all times of effluent production. The Permittee must demonstrate compliance with the turbidity and UV dose requirement.*

**DDW Comment 3: Section IV.D.2.g.iii**

Revise section IV.D.2.g.iii to read "The values of high daily and 7-day rolling median total coliform when an operational response must be taken."

***RWB Response DDW3:*** *Page 14, section IV.D.2.g.iii. of the Proposed Permit has been modified as follows.*

*The values of high daily and ~~weekly~~ 7-day rolling median total coliform when an operational response must be taken.*

**DDW Comment 4: Section IV.D.2.l.**

Revise section IV.D.2.l to read "Operate the UV disinfection system with a built-in automatic reliability feature that triggers the following critical alarm setpoints:

a. Conditions that should trigger an alarm and startup the next available row of UV bank or UV channel shall include the following:

i. Ballast failure

ii. Multiple lamp failure

iii. Low UV transmittance below 69.1%

iv. UVT signal failure

b. Conditions that should divert effluent to waste shall include the following:

i. Power failure

ii. UV channel(s) water level higher than 62 inches

iii. UV channel(s) water level lower than 57.5 inches

iv. UV dose below 100 mJ/cm2

v. UV transmittance below 55%

**Permittee Response 4:** The Town already operates under the proposed critical alarm setpoints and diversion settings. The Town would like to suggest that "Ballast failure" be changed to "Electronic lamp controller failure". Electronic lamp controller failure is a more general term and current alarms under this failure condition includes ballast failures.

***RWB Response DDW4:*** *Page 14, section IV.D.2.l. of the Proposed Permit has been modified as follows.*

*l. Operate the UV disinfection system with a built-in automatic reliability feature that ~~must be~~ triggers~~ed~~ the following critical alarm set points:*

**i.** Conditions that should trigger an alarm and startup the next available row of UV banks or UV channel shall include the following:

**(a)** Electronic lamp controller failure

**(b)** Multiple lamp failure

**(c)** Low UV transmittance below 69.1%

**(d)** UVT signal failure

**ii.** Conditions that should divert effluent to waste shall include the following:

**(a)** Power failure

**(b)** UV channel(s) water level higher than 62 inches

**(c)** UV channel(s) water level lower than 57.5 inches

**(d)** UV dose below 100 $mJ/cm^2$

**(e)** UVT below 55%

~~*when the system is below the target UV dose. If the measured UV dose goes below the minimum UV dose, the UV reactor in question must alarm and startup the next available row of UV lamps or UV lamp bank.*~~

**DDW Comment 5:**

The Town's supplemental information provided on January 17, 2020, identified a bypass line from the filters to the recycled water clearwell. Title 22 section 60331 prohibits bypassing of partially treated wastewater from the reclamation plant or any intermediate unit processes to the point of use. The bypass pipeline must be abandoned and decommissioned. The Town must submit a plan to DDW and the Regional Board describing the Town's plan and timeline for completing this work. Provide the plan within three (3) months of the date of this letter.

***RWB Response DDW5:*** *The Permittee submitted a decommissioning plan to DDW on June 11, 2020. DDW accepted the decommissioning plan on June 11, 2020. The Permittee will update both DDW and the Regional Water Board when the work is complete.*

**DDW Comment 6:**

The Town must add high and high-high turbidity alarms to the list of conditions that would require an immediate diversion to take place, triggering the two fail-closed emergency shut-off valves (V7 and V8). The Town must make this change in the treatment plant's SCADA programming and provide documentation of its completion to DDW and the Regional Board within 30 days of the date of this letter.

**Permittee Response DDW6:** Under the current high setpoint (1.5 NTU) is audible only, while the high-high turbidity alarm (2.0 NTU), triggers water to be diverted before the sand filter structure, which will result in a low UV channel flow alarm and a subsequent closing of emergency shut-off valves (V7 and V8). Although the Town is amenable to updating these alarm settings to trigger the closing of V7 and V8 directly when a high-

high turbidity set point is reached, the Town would like to request an extension of the 30-day deadline proposed by DDW. These changes will require additional budget to acquire the assistance of a SCADA contractor. The Town did not anticipate this expense and will not have funds available until July 1. Additionally, Task Orders authorizing contractor work can take up to 30 days to be initiated during normal conditions. With Town staffing being limited due to COVID-19 social distancing, these timelines can possibly be extended even further. As a result, the Town would like to request that the deadline for the SCADA alarm work be extended to 90 days after July 1.

***RWB Response DDW6:*** *Section IV.D.1.c on Page 13 of the Proposed Permit has been modified as follows.*

*c. Filtered effluent in excess of the turbidity specifications shall not enter the recycled water distribution system. The Permittee's SCADA programming must be updated, by* ***October 1, 2020,*** *to include high and high-high turbidity alarms that trigger emergency shut off valves (V7 and V8). Filtered effluent in excess of turbidity specifications shall be automatically diverted to an upstream treatment process unit or to emergency storage as soon as the Permittee is aware of the exceedance. The Permittee shall provide notification of non-compliance with the filtration process requirements as required in section IX.A.2.c of the MRP (Attachment E).*

**DDW Comment 7:**

Any proposed plans and specifications for new dual plumbed recycled water use areas must be submitted for DDW approval prior to the delivery of recycled water to the facility. As required by Title 22 section 60314, report, plans, and specifications must include the following:

a. A report containing a detailed description of the intended use area identifying the following:

i. The number, location, and type of facilities within the use area proposing to use dual plumbed systems,
ii. The average number of persons estimated to be served by each facility on a daily basis,
iii. The specific boundaries of the proposed use area including a map showing the location of each facility to be served,
iv. The person or persons responsible for operation of the dual plumbed system at each facility, and
v. The specific use to be made of the recycled water at each facility.

b. Plans and specifications describing the following:

i. Proposed piping system to be used,
ii. Pipe locations of both the recycled and potable systems,
iii. Type and location of the outlets and plumbing fixtures that will be accessible to the public, and

iv. The methods and devices to be used to prevent backflow of recycled water into the public water system.

c. Include a description of method to be used by the Town to assure that the installation and operation of the dual plumbed system will not result in cross connections between the recycled water piping system and the potable water piping system (separation test). This shall include a description of pressure, dye or other test methods to be used for initial cross connection test and subsequent cross connection test every four years.

d. The inspections and the testing shall be performed by a cross connection control specialist certified by the California-Nevada section of the American Water Works Association or an organization with equivalent certification requirements. Please identify that person.

e. Annually after the initial separation test, the Town shall ensure that the dual plumbed recycled water system (indoor and outdoor) is inspected for possible cross connection with potable water system.

f. The Town shall notify DDW prior to conducting the cross-connection control test. DDW staff may witness the test.

***RWB Response DDW7:*** *The language included in DDW Comment 7 will be included in sections 5.3.2, 5.3.3, 5.3.4, and 6.6.1 of the Recycled Water General Order MRP.*

**DDW Comment 8:**

Cross connection test for existing dual plumbed use area must be conducted every four years. The Town must maintain documentation of the successful completion of the test. An annual inspection or cross connection survey must be performed for each site.

***RWB Response DDW8:*** *The language included in DDW Comment 8 will be included in Table E-5 of the Recycled Water General Order MRP.*

**DDW Comment 9:**

Provide a copy of the revised Agricultural Recycled Water User Agreement, and updates to the Town's Recycle Water Design and Construction Standard to DDW and North Coast RWQCB upon completion.

***RWB Response DDW9:*** *The language included in DDW Comment 9 will be included in section 6.5.1 of the Recycled Water General Order MRP.*

**DDW Comment 10:**

New types of recycled water use must be addressed by submittal of a revision or update to the Engineering Report.

***RWB Response DDW10:*** *The language included in DDW Comment 10 will be included in section 6.6.2 of the Recycled Water General Order MRP.*

**DDW Comment 11:**

Submit revisions and updates to the Engineering Report and appendices (including any updates to the Recycled Water Users' Guide) to DDW and the Regional Water Quality Control Board to reflect changes in the Town's water reclamation system, operations, and recycled water program management.

***RWB Response DDW11:*** *Section IV.C.2.c. of the Proposed Permit contains the following language. "The Permittee shall submit revisions and updates to the title 22 Recycled Water Engineering Report to reflect any changes in operations and recycled water management or new use types."*

*No changes have been made to the Proposed Permit due to DDW Comment 11.*

**DDW Comment 12:**

Any updates or changes to the Engineering Report must also be made in any application or documents submitted to the Regional Water Quality Control Board.

***RWB Response DDW12:*** *Section IV.C.2.c. of the Proposed Permit contains the following language. "The Permittee shall submit revisions and updates to the title 22 Recycled Water Engineering Report to reflect any changes in operations and recycled water management or new use types." No changes have been made to the Proposed Permit due to DDW Comment 12.*

**Staff Initiated Changes**

As discussed in Comment 3 above, the Permittee is enrolling in the RWGO. Since the distribution of recycled water will be permitted under the RWGO and the associated MRP, the Water Recycling Requirements have been removed from the Title and the first sentence of the Proposed Permit.

***SIC 1:*** *Pursuant to Water Code section 13523, the Regional Water Board, after consulting with and receiving the recommendation of the State Water Board, may prescribe water reclamation requirements for water that is used or proposed to be used as recycled water. Since the Permittee is enrolling under the Recycled Water General Order (RWGO), and consistent with the Proposed Permit only including recycled water requirements for the production side of recycled water, the words Water Recycling Requirements has been removed from the Title of the Proposed Permit and the first sentence of the Proposed Permit."*

***ORDER NO. R1-2020-0010***
***NPDES NO. CA0023345***
***WDID NO. 1B82037OSON***

***WASTE DISCHARGE REQUIREMENTS***
***~~AND WATER RECYCLING REQUIREMENTS~~***

***FOR THE***

***WINDSOR WATER DISTRICT***
***WASTEWATER TREATMENT, RECLAMATION, AND DISPOSAL FACILITY***
***SONOMA COUNTY***

*The following Permittee is subject to waste discharge requirements (WDRs) ~~and water recycling requirements~~ set forth in this Order:*