
North Coast Regional Water Quality Control Board

**Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2024-0016
National Pollutant Discharge Elimination System (NPDES)
For the
City of Ukiah
Wastewater Treatment Plant
Regional Water Quality Control Board, North Coast Region
August 15, 2024**

Comments Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2024-0016, National Pollutant Discharge Elimination System Permit (Draft Permit) for the City of Ukiah (City or Permittee) Wastewater Treatment Plant (Facility) was June 10, 2024. Regional Water Board staff (Staff) only received written comments from the Permittee during the Draft Permit's notification period. Additionally, Larry Walker Associates, the City's consultant, provided a marked up copy of the proposed Order identifying non-substantive changes that the City felt were necessary to correct or clarify the Order.

Regional Water Board staff met virtually with the Permittee on May 31, 2024 to discuss the Draft Permit and proposed changes made in response to comments received. The Permittee did not identify any significant concerns with the proposed changes discussed during this meeting.

This Response to Comments document includes a summary of the comments received from the Permittee, followed by Regional Water Board staff response to each comment. Additionally, this Response to Comments document includes a summary of staff-initiated changes made to the Permit. Text added to the Proposed Permit is identified by underline and text to be deleted from the Proposed Permit 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 received and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

A. City of Ukiah Comment Letter

Comment No. A1: The City identified that they are enrolled under State Water Resources Control Board Order No. WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order) and that this allows the City to add new recycled water users and use sites as long as the recycled water is utilized for an approved purpose. The City suggests updating the language in Section 3.6 of the proposed Order to indicate that the discharge of recycled, filtered wastewater be restricted to approved uses and not use areas to better align with the allowances of the Recycled Water General Order.

Response to Comment No. A1: Regional Water Board staff agree with the City's assessment of Section 3.6 of the proposed Order. Section 3.6 of the proposed Order has been modified as follows:

- 3.6. The discharge of recycled, filtered wastewater ~~to any use area~~ for any use not addressed in a DDW-accepted title 22 Recycled Water Engineering Report and Notice of Applicability for Water Quality Order No. WQ 2016-0068-DWQ, or future revisions thereof, is prohibited.

Additionally, the proposed Order's Fact Sheet has been updated as follows:

- 4.1.6. Discharge Prohibition 3.6. The discharge of recycled, filtered wastewater ~~to any point for any use~~ not addressed in the current DDW-accepted Title 22 Recycled Water Engineering Report and Notice of Applicability for Water Quality Order No. WQ 2016-0068-DWQ, or future revisions thereof, is prohibited.

This prohibition is newly established by this Order and is necessary to ensure that the Permittee only discharges ~~waste~~ recycled water in accordance with WDRs and Water Reclamation Requirements (WRRs). It is based on sections ~~301 and 402 of the federal CWA and section 13263 and 13523~~ of the Water Code.

Comment No. A2: The City identifies that reasonable potential and effluent limits for 2,3,7,8 TCDD (dioxin) were established based on one DNQ result measured in March 2020. The City suggests that this sample result should not have been qualified by the laboratory and discarded because dioxin was detected in the Method Blank at a concentration higher than the sample result. The City requests that the reasonable potential and effluent limits resulting from this laboratory result be removed based on lack of confidence in the March 2020 sample result.

Response to Comment No. A2:

Regional Water Board staff (Staff) have reviewed the quality control data for the identified laboratory data and agree that the reported dioxin result is suspect because the reported concentration in the method blank is greater than the reported concentration in the effluent sample. With the omission of this sample result from the reasonable potential analysis, reasonable potential for dioxin is no longer present and the effluent limitations for dioxin may be removed. Dioxin monitoring in the facility's effluent remains required through an annual CTR Priority Pollutant monitoring requirement when discharges to the Russian River occur, and once per permit term if a discharge to the Russian River does not occur. The proposed Order has been modified to remove the 2,3,7,8-TCDD effluent limitation and monitoring requirements as follows:

The table row associated with 2,3,7,8-TCDD has been removed from Table 2, Effluent Limitations – Discharge Point 001, of the proposed Order.

The table row associated with 2,3,7,8-TCDD has been removed from Table E-4, Effluent Monitoring – Monitoring Location EFF-001B, of the proposed Order's Monitoring and Reporting Program.

The table row associated with 2,3,7,8-TCDD has been removed from Table F-2, Historic Effluent Limitations and Monitoring Data – Discharge Point 001, of the proposed Order's Fact Sheet.

The table row associated with 2,3,7,8-TCDD has been removed from Table F-5, Summary of Reasonable Potential Analysis Results for Priority Pollutants, Ammonia, and Title 22 Pollutants, of the proposed Order's Fact Sheet.

Section 4.3.3.3. of the proposed Order's Fact Sheet was modified to remove the reference to 2,3,7,8-TCDD as follows:

4.3.3.3. Reasonable Potential Determination

The RPA demonstrated reasonable potential for discharges of copper, ~~2,3,7,8-TCDD~~, and dichlorobromomethane from the Facility to cause or contribute to exceedances of applicable water quality criteria. Reasonable potential could not be determined for all pollutants, as there are not applicable water quality criteria for all pollutants. The RPA determined that there is either no reasonable potential or there was insufficient information to conclude affirmative reasonable potential for ~~422~~ 123 of the 126 priority pollutants.

and

~~**2,3,7,8-TCDD.** The CTR establishes a water quality criterion for the protection of human health for 2,3,7,8-TCDD of 1.3×10^{-8} $\mu\text{g/L}$. 2,3,7,8-TCDD was detected in the effluent in one of two samples collected between March 2020 and January 2023, with a DNQ result of 3.27×10^{-6} $\mu\text{g/L}$. No receiving water samples were collected for 2,3,7,8-TCDD. A determination of reasonable potential has been made based on the MEC of 3.27×10^{-6} $\mu\text{g/L}$, exceeding the most stringent water quality objective of 1.3×10^{-8} $\mu\text{g/L}$.~~

Section 4.3.4 and Table F-8 of the proposed Order's Fact Sheet were modified to remove the reference to 2,3,7,8-TCDD as follows:

Step 4: When the most stringent water quality criterion/objective is a human health criterion/objective (as for ~~2,3,7,8-TCDD~~ and dichlorobromomethane), the AMEL is set equal to the ECA. From ~~Table 2 of the SIP~~, when $CV = 0.60$ and $n = 4$, the MDEL multiplier at the 99th percentile occurrence probability equals 3.1, and the AMEL multiplier at the 95th percentile occurrence probability equals 1.6 (~~2,3,7,8-TCDD~~). From Table 2 of the SIP, when $CV = 1.02$ and $n = 4$, the MDEL multiplier at the 99th percentile occurrence probability equals 5.0, and the AMEL multiplier at the 95th percentile occurrence probability equals 2.0 (dichlorobromomethane). The MDEL for protection of human health is calculated by multiplying the ECA by the ratio of the MDEL multiplier to the AMEL multiplier. Final WQBELs for ~~2,3,7,8-TCDD~~ and dichlorobromomethane are determined as follows.

Table F-8. Determination of Final WQBELs Based on Human Health Criteria

Pollutant	Units	MDEL Multiplier	AMEL Multiplier	MDEL	AMEL
2,3,7,8-TCDD	$\mu\text{g/L}$	2.0	1.6	2.6E-8	1.3E-8
Dichlorobromomethane	$\mu\text{g/L}$	5.0	2.0	1.42	0.5

Section 7.2.2.3 of the proposed Order's Fact Sheet has been removed as follows:

~~7.2.2.3. Monitoring data collected over the term of Order No. R1-2018-0035 demonstrated that the discharge exhibits reasonable potential to cause or contribute to an exceedance of water quality criteria for 2,3,7,8-TCDD (Dioxin) and this Order establishes new effluent limitations for dioxin at Discharge Point 001. Therefore, this Order establishes a monthly monitoring requirement for dioxin at Monitoring Location EFF-001B to determine compliance with the applicable effluent limitation.~~

The table row for 2,3,7,8-TCDD within Attachment F-1, Wastewater Treatment Facility RPA Summary has been modified as follows:

Pollutant	Units	MEC ¹	B	C	CMC	CC	Wate & Org ²	Org Only ³	MCL	RP ⁴
2,3,7,8 TCDD	µg/L	<3.27E-06 <1.0E-05	--	1.3E-08	--	--	1.3E-08	--	3.0E-05 1.0E-05	Yes No

Comment No. A3: The City identifies that there are occasional, instantaneous exceedances of the 5 gpm/ft² effluent filter loading rate that occur during filter maintenance. They are requesting to modify the compliance determination of this limit to use the average of the filter loading rate over a period of time.

Response to Comment No. A3:

The 5 gpm/ft² effluent filter loading rate is specified in the Water Recycling Criteria, section 60301.320 of the CCR and as such, cannot be modified. However, the City may use its discretion to identify specific data points that are not representative of the filtration system operation, such as during a maintenance process, when reporting data for compliance determination. Regional Water Board staff further encourage the City to provide a narrative description within their Self-Monitoring Reports of all data corrections or omissions that occur during each reporting period to provide transparency. No changes have been made to the proposed Order in response to this comment.

Comment No. A4: The City identifies that the Modal Contact Time (CT) is only applicable to Discharge Point 003 (recycled water production), but that the proposed Order is inconsistent as it requires filtration and turbidity requirements for Discharge Point 001 and 003. The City suggested changes in the language to clarify that the CT requirement is only applicable to recycled water production.

Response to Comment No. A4:

Staff agrees that the CT requirement is based on recycled water production requirements and is not a requirement of effluent discharges to the Russian River. The application of the CT requirement to the Facility's surface water discharge was previously included by Regional Water Board staff through Best Professional Judgement, as the CT requirement can demonstrate that discharges to the river are of advanced treated wastewater and ensure disinfection requirements are met.

After discussions with the City, staff recognize that utilizing the CT requirement during periods of high flows through the Facility, the only time discharges from the Facility are expected to occur, results in the high amounts of disinfection and dechlorination

chemicals being used, and that the high amount of these chemicals necessary to ensure compliance with the CT requirement may negatively impact the quality of the discharge. With this understanding, Staff agree that the CT Requirement should no longer be required, but that daily monitoring of total coliform will be required during periods of discharge to the Russian River to demonstrate that adequate disinfection is occurring. The proposed Order's language has been modified as follows:

- 4.1.1.1. The discharge of advanced treated wastewater shall maintain compliance with the following effluent limitations at Discharge Point 001, with compliance measured at Monitoring Location EFF-001B as described in the MRP (Attachment E). ~~The advanced treated wastewater shall be adequately oxidized, filtered, and disinfected as defined in title 22, division 4, chapter 3, of the CCR.~~

Additionally, the proposed Order's Monitoring and Reporting Program has been modified as follows:

- 9.2.1.1. **Monitoring.** When discharging to Discharge Points 001 and 003, the chlorine residual of the effluent from the advanced wastewater treatment chlorine contact basin shall be monitored continuously at a point prior to dechlorination and recorded, ~~and the modal contact time shall be determined at the same point.~~

When discharging to Discharge Point 003, the chlorine residual of the effluent from the advanced wastewater treatment chlorine contact basin shall be monitored continuously and the modal contact time shall be determined at the same point.

Furthermore, Table E-3 of the proposed Order's Monitoring and Reporting Program has been modified as follows:

Table E-3. Effluent Monitoring – Monitoring Location EFF-001A

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ⁽¹⁾
Total Coliform Organisms	MPN/100 ml	Grab	Weekly Daily	Standard Methods
Chlorine, Total Residual ⁽²⁾	mg/L	Grab	Continuous	Standard Methods
<u>Table Notes</u>				
1. In accordance with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136.				

2. See additional chlorine residual monitoring and reporting requirements in Order section 7.13 and MRP section 9.2.

Comment No. A5: The City requests that Monitoring Location RSW-003 should be used for upstream monitoring requirements because Monitoring Location RSW-001 is unsafe to access. RSW-003 is slightly farther upstream of Discharge Point 001 and was approved for upstream receiving water monitoring during the current permit term.

Response to Comment No. A5:

Staff are agreeable to allowing the use of monitoring location RSW-003 for upstream receiving water monitoring of the Russian River. The proposed Order's Monitoring and Reporting Program and Fact Sheet have been modified to indicate the use of RSW-003 in place of Monitoring Location RSW-001. Table E-1 has been modified to remove Monitoring Location RSW-001. Additionally, Table E-1 has been modified to remove Monitoring Locations RSW-004 and RSW-005 as these Monitoring Locations are no longer used. Table E-1 has been modified as follows:

Table E-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
--	INF-001	Untreated influent wastewater collected at the plant headworks at a representative point preceding primary treatment.
001	INT-001A	Location for monitoring the flow and surface loading rate through the advanced wastewater treatment process filters.
001	INT-001B	Treated wastewater immediately following the advanced wastewater treatment process and prior to the chlorine contact basin.
001	EFF-001A ⁽¹⁾	A representative point immediately following advanced wastewater treatment disinfection but prior to dechlorination.
001	EFF-001B	Treated wastewater after advanced wastewater treatment disinfection but prior to discharge to the Russian River. Latitude: 39°07'07" Longitude: 123°11'28"
002	EFF-002	Treated wastewater after secondary disinfection but prior to discharge to the percolation ponds.
003	REC-001 ⁽¹⁾	Treated wastewater following advanced wastewater treatment disinfection but prior to discharge to the recycled water storage pond.

--	BIO-001	A representative sample of the sludge or biosolids generated when removed for disposal.
--	RSW-001	Upstream receiving water monitoring location in the Russian River, approximately 50 feet upstream of Discharge Point 001 and at a location that is not influenced by the discharge.
--	RSW-002	Downstream receiving water monitoring location in the Russian River, in an area influenced by Discharge Point 001. This monitoring location ranges between 50 and 200 feet downstream of the discharge outfall and depends on the river stage.
--	RSW-003	Russian River monitoring location, upstream of any potential influence of the percolation ponds <u>and Discharge Point 001</u> .
--	RSW-004	Russian River monitoring location in the vicinity of the southern end of the Middle Percolation Pond and upstream of RSW-005.
--	RSW-005	Russian River monitoring location, immediately downstream of the percolation ponds.
--	GW-001	Up-gradient shallow groundwater monitoring well (approximately 27 feet deep) located 600 feet southwest of the percolation ponds.
--	GW-002	Down-gradient shallow monitoring well (approximately 25 feet deep) located 150 feet south of the percolation ponds.
--	GW-003	Up-gradient monitoring well currently located 150 feet north of the percolation ponds and to be relocated to new east of Percolation Pond 3.
--	GW-004	Shallow well (approximately 33 feet deep) at eastern berm of Percolation Pond 1 (between pond and the Russian River).
--	GW-005	Deeper well (approximately 140 feet deep) at eastern berm of Percolation Pond 1 (between pond and the Russian River).
--	SEEP-XXX	Monitoring location for seeps located along the bank of the Russian River. Seeps are to be numbered SEEP-001, SEEP-002, etc.

Table Notes

1. EFF-001A and REC-001 are the same location, the sampling point immediately following the chlorine disinfection system. Different discharge point and monitoring location names have been assigned due to differences in monitoring requirements at Discharge Point 001 (for discharges to the Russian River) and 003 (for discharge to the recycled water system).

Additionally, all references to Monitoring Location RSW-001 have been updated to reference Monitoring location RSW-003.

Section 8 of the proposed Order's Monitoring and Reporting Program has been modified as follows:

8. RECEIVING WATER MONITORING REQUIREMENTS

8.1. Monitoring Location ~~RSW-001~~ RSW-003

8.1.1. The Permittee shall monitor the Russian River at Monitoring Location ~~RSW-001~~ RSW-003 during periods of discharge to the Russian River follows:

Table E 7. Receiving Water Monitoring – Monitoring Location ~~RSW-001~~ RSW-003

Sections 7.5.1.1, 7.5.1.1.2, 7.5.1.1.4, and 7.6.3 of the proposed Order's Fact Sheet has been modified as follows:

7.5.1.1. **Monitoring Locations ~~RSW-001~~ RSW-003 and RSW-002**

7.5.1.1.2. Monitoring requirements at Monitoring Location ~~RSW-001~~ RSW-003 for flow, pH, copper, ammonia, dissolved oxygen, specific conductance, hardness, nitrate, phosphorus, total dissolved solids, temperature, and turbidity have been retained from Order No. R1-2018-0035.

7.5.1.1.4. Receiving water monitoring at monitoring location ~~RSW-001~~ RSW-003 for aluminum, manganese, dissolved organic carbon, and CTR Priority Pollutants have been established in this Order to inform Regional Water Board staff of the reasonable potential for the Permittee to cause or contribute to an exceedance of the water quality objective for these constituents.

7.6.3. Visual Monitoring. Visual Monitoring requirements for the effluent (Monitoring Locations EFF-001B) and receiving water (Monitoring Locations ~~RSW-001~~ and RSW-002) are retained from Order No. R1-2018-0035 and are necessary to ensure compliance with receiving water limitations in section 5 of the Order. Visual Monitoring requirements previously conducted at Monitoring Location RSW-001 are now required at Monitoring Location RSW-003.

Comment No. A6: The City requests that Total Coliform and *E. Coli* monitoring should be conducted at EFF-001A only. Effluent limitations are established at EFF-001A and samples at this location are representative of disinfection process effectiveness. EFF-

001B is unsafe to access and prone to contamination by wildlife. Approval to only collect total coliform samples at EFF-001A was provided during the current permit term.

Response to Comment No. A6:

Staff agree that Total Coliform monitoring may be removed from Monitoring Location EFF-001B as the monitoring conducted at Monitoring Location EFF-001A ensures that the City is meeting its applicable disinfection requirements. It remains necessary to retain *E. coli* monitoring at Monitoring Location EFF-001B so that this data are representative of the discharge as it occurs to surface waters. The City may elect to conduct additional *E. coli* monitoring at Monitoring Location EFF-001A if they wish to demonstrate that any identified *E. coli* bacteria results are not due to inadequate disinfection from the Facility, but this is not required as part of the proposed Order.

Under circumstances where Monitoring Location EFF-001B becomes unsafe to access, the City should prioritize the safety of its employees over sample collection and make efforts to collect representative samples from this location when it becomes safe to do so. The table row associated with Total Coliform within Table E-4 of the proposed Order's Monitoring and Reporting Program has been removed.

Additionally, Section 7.2.2.1 of the proposed Order's Fact Sheet has been modified as follows:

- 7.2.2.1. Effluent monitoring frequencies and sample types for flow, BOD₅, TSS, pH, ~~total coliform bacteria~~, copper, dichlorobromomethane, chlorine residual, dissolved oxygen, specific conductance, hardness, nitrate, nitrite, ammonia, phosphorus, aluminum, temperature, and total dissolved solids at Monitoring Location EFF-001B have been retained from Order No. R1-2018-0035 to determine compliance with the applicable effluent limitation or other permit conditions.

Comment No. A7: The City identified that the AMEL and MDEL Ammonia Standards included in Tables G-1 and G-2 of Attachment G were calculated with a number of samples per month factor (n) of 30 instead of 4. The City requests that Tables G-1 and G-2 be updated to reflect the correct number of samples per month factor.

Response to Comment No. A7: Regional Water Board Staff agree that the AMEL Ammonia Standards provided for in Table G-1 used the wrong number of samples factor (n) in its calculations. The Ammonia Standards provided for in Table G-2 are not dependent on the number of samples factor (n) and remain correct. Staff have replaced Table G-1 with the correct AMEL Ammonia Standards as shown below:

ATTACHMENT G - AMEL AND MDEL AMMONIA STANDARDS BASED ON 2013 FRESHWATER ACUTE CRITERIA

Table G-1. pH and Temperature Dependent AMEL Ammonia Criteria

pH	Temp (°C)																	
	0	14.0	15.0	16.0	17.0	18.0	19.0	20.0	21.0	22.0	23.0	24.0	25.0	26.0	27.0	28.0	29.0	30.0
6.5	3.82	2.43	2.28	2.14	2.01	1.88	1.76	1.65	1.55	1.45	1.36	1.28	1.20	1.12	1.05	0.99	0.93	0.87
6.6	3.77	2.40	2.25	2.11	1.98	1.85	1.74	1.63	1.53	1.43	1.34	1.26	1.18	1.11	1.04	0.97	0.91	0.85
6.7	3.70	2.35	2.21	2.07	1.94	1.82	1.70	1.60	1.50	1.40	1.32	1.23	1.16	1.09	1.02	0.95	0.89	0.84
6.8	3.61	2.30	2.16	2.02	1.89	1.78	1.67	1.56	1.46	1.37	1.29	1.21	1.13	1.06	0.99	0.93	0.87	0.82
6.9	3.51	2.23	2.10	1.96	1.84	1.73	1.62	1.52	1.42	1.33	1.25	1.17	1.10	1.03	0.97	0.91	0.85	0.80
7.0	3.39	2.16	2.02	1.90	1.78	1.67	1.56	1.47	1.37	1.29	1.21	1.13	1.06	1.00	0.93	0.88	0.82	0.77
7.1	3.25	2.07	1.94	1.82	1.71	1.60	1.50	1.41	1.32	1.24	1.16	1.09	1.02	0.95	0.90	0.84	0.79	0.74
7.2	3.09	1.97	1.85	1.73	1.62	1.52	1.43	1.34	1.25	1.18	1.10	1.03	0.97	0.91	0.85	0.80	0.75	0.70
7.3	2.91	1.85	1.74	1.63	1.53	1.43	1.34	1.26	1.18	1.11	1.04	0.97	0.91	0.86	0.80	0.75	0.71	0.66
7.4	2.72	1.73	1.62	1.52	1.42	1.34	1.25	1.17	1.10	1.03	0.97	0.91	0.85	0.80	0.75	0.70	0.66	0.62
7.5	2.50	1.59	1.49	1.40	1.31	1.23	1.15	1.08	1.01	0.95	0.89	0.84	0.78	0.74	0.69	0.65	0.61	0.57
7.6	2.28	1.45	1.36	1.28	1.20	1.12	1.05	0.99	0.92	0.87	0.81	0.76	0.71	0.67	0.63	0.59	0.55	0.52
7.7	2.05	1.31	1.23	1.15	1.08	1.01	0.95	0.89	0.83	0.78	0.73	0.69	0.64	0.60	0.57	0.53	0.50	0.47
7.8	1.83	1.16	1.09	1.02	0.96	0.90	0.84	0.79	0.74	0.69	0.65	0.61	0.57	0.54	0.50	0.47	0.44	0.41
7.9	1.60	1.02	0.96	0.90	0.84	0.79	0.74	0.69	0.65	0.61	0.57	0.54	0.50	0.47	0.44	0.41	0.39	0.36
8.0	1.40	0.89	0.83	0.78	0.73	0.69	0.64	0.60	0.57	0.53	0.50	0.47	0.44	0.41	0.38	0.36	0.34	0.32
8.1	1.20	0.77	0.72	0.67	0.63	0.59	0.55	0.52	0.49	0.46	0.43	0.40	0.38	0.35	0.33	0.31	0.29	0.27
8.2	1.03	0.65	0.61	0.58	0.54	0.51	0.47	0.44	0.42	0.39	0.37	0.34	0.32	0.30	0.28	0.27	0.25	0.23
8.3	0.87	0.56	0.52	0.49	0.46	0.43	0.40	0.38	0.35	0.33	0.31	0.29	0.27	0.26	0.24	0.23	0.21	0.20
8.4	0.74	0.47	0.44	0.41	0.39	0.36	0.34	0.32	0.30	0.28	0.26	0.25	0.23	0.22	0.20	0.19	0.18	0.17
8.5	0.62	0.40	0.37	0.35	0.33	0.31	0.29	0.27	0.25	0.24	0.22	0.21	0.20	0.18	0.17	0.16	0.15	0.14
8.6	0.53	0.34	0.31	0.30	0.28	0.26	0.24	0.23	0.21	0.20	0.19	0.18	0.17	0.15	0.15	0.14	0.13	0.12
8.7	0.45	0.28	0.27	0.25	0.23	0.22	0.21	0.19	0.18	0.17	0.16	0.15	0.14	0.13	0.12	0.12	0.11	0.10
8.8	0.38	0.24	0.23	0.21	0.20	0.19	0.17	0.16	0.15	0.14	0.14	0.13	0.12	0.11	0.10	0.10	0.09	0.09
8.9	0.32	0.21	0.19	0.18	0.17	0.16	0.15	0.14	0.13	0.12	0.12	0.11	0.10	0.10	0.09	0.08	0.08	0.07
9.0	0.28	0.18	0.17	0.16	0.15	0.14	0.13	0.12	0.11	0.11	0.10	0.09	0.09	0.08	0.08	0.07	0.07	0.06

Comment No. A8: The City is planning to install a septage receiving station at the wastewater treatment plant during the upcoming permit term and requests that any necessary permit provisions that are necessary to allow the City to implement this change be included in the Order.

Response to Comment No. A8:

Regional Water Board Staff are supportive of providing all the necessary requirements within the City's NPDES Permit to allow the future inclusion of a septage receiving station. The following sections have been added to the proposed Order to accommodate the City's request:

6.3.3.4. Septage Handling Requirements. Upon approval of a Septage Management Program, the Permittee shall comply the following provisions:

6.3.3.4.1. The Permittee shall implement any necessary legal authorities to monitor and enforce septage handling requirements, including restriction of discharges of toxic materials to the collection system and wastewater treatment facility and inspection facilities connected to the system.

6.3.3.4.2. The Permittee shall maintain a waste hauler manifest that identifies the names of the hauler, county identification number, the date and time the waste load was transferred, and the volume and source of the waste.

6.3.3.4.3. The Permittee shall accept the discharge of septage only during business hours and when the Permittee's operations staff is on site.

6.3.3.4.4. The Permittee shall accept septage only at an approved septage receiving station/location.

6.3.3.4.5. The Permittee shall collect representative grab samples of septage loads in accordance with the MRP (Attachment E).

Septage requirements have not been included in the proposed Order's Monitoring and Reporting Program at this time. The Order's Monitoring and Reporting Program will be revised under Executive Officer's signature to address all necessary septage monitoring and reporting requirements upon approval of the City's Septage Management Program.

Additionally, section 2.5, Planned Changes, of the proposed Order's Fact Sheet has been modified to indicate that the City is proposing to accept septage during the term of this Order, as follows:

2.5. Planned Changes

During the term of this Order, the Permittee anticipates completing constructing of the Phase 4 projects related to their recycled water system. This project will include the installation of online analyzers and automatic actuation valves and expand the recycled water distribution system for users west of Highway 101 and further reduce effluent discharges to the Russian River. Additionally, this project will add a Production Augmentation Unit to the treatment system that will allow the Permittee to increase production flows during periods of low influent flow to provide recycled water for landscape irrigation, agricultural irrigation, and frost protection.

Other planned changes to the Facility include SCADA/PLC upgrades to improve communication and reliability of the Facility's control system. This upgrade will also allow for remote viewing of WWTP data and better protection against cyber threats. Additional planned changes include the replacement of the belt filter press with a FKC Screw Press, and installation of a new Suspended Air Floatation (SAF) system for solids treatment, and installation of a septage receiving station.

B. Larry Walker Associates Suggested Changes

The City's Consultant, Larry Walker Associates, provided a marked up copy of the proposed Order with non-substantive changes proposed to provide editorial correction or clarification to areas of the permit. These changes are as follows:

Section 2.3 of the proposed Order has been modified as follows:

2.3. Provisions and Requirements Implementing State Law

The provisions/requirements in subsections 3.5, 3.6, 4.2, 4.3, 5.2, 6.3.1.10, and ~~6.3.6.2~~ 6.3.5.2 and section 6, 7, and 10.5 of the MRP are included to implement state law only. These provisions/requirements are not required or authorized under the federal CWA; consequently, violations of these provisions/requirements are not subject to the enforcement remedies that are available for NPDES violations.

Section 3.3 of the proposed Order has been modified as follows:

2.3. The discharge of sludge or digester supernatant is prohibited, except as authorized under section ~~6.3.5.2~~ 6.3.4.2 of this Order (Sludge Disposal and Handling Requirements).

Section 4.4.2.1.2 of the proposed Order has been modified as follows:

4.4.2.1.2. Effluent not meeting the CT criteria shall be 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 disinfection process requirements as required by section ~~9.1.2.3~~ 9.2.1.3 of the MRP (Attachment E).

Section 6.3.5.1 of the proposed Order has been modified as follows:

6.3.5.1. Storm Water

~~For the control of storm water discharges from the Facility, the Permittee shall seek separate authorization to discharge under the requirements of the The Permittee has coverage under, and is separately subject to, the requirements of State Water Board's Water Quality Order No. 2014-0057-DWQ, NPDES General Permit No. CAS000001, General Permit for Storm Water Discharges Associated with Industrial Activities (or subsequent revisions of the Storm Water General Permit), which is not incorporated by reference in this Order.~~

Sections 7.10 and 7.11 of the proposed Order have been modified as follows:

7.10. Average Dry Weather Flow

Compliance with the average dry weather flow prohibition in section ~~3.7~~ 3.8 of this Order will be determined once each calendar year by evaluating all flow data collected in a calendar year. The flow through the Facility, measured daily and averaged monthly, must be 3.01 mgd or less for the month with the lowest average monthly flow.

7.11. Peak Daily Wet Weather Flow

The peak daily wet weather flow is the maximum flow rate that occurs over a 24-hour period. Compliance with the peak daily wet weather flow prohibition for the Facility in section ~~3.7~~ 3.8 of this Order will be determined daily by measuring the daily average flow at Monitoring Location INF-001. Compliance with the peak daily wet weather flow prohibition for the advanced wastewater treatment system in section ~~3.7~~ 3.8 of this Order will be determined daily by measuring the daily average flow at Monitoring Location INT-001A. If the measured daily average flow exceeds 24.5 mgd at Monitoring Location INF-001 or 7.0 mgd at Monitoring Location INT-001A, the discharge is not in compliance with Prohibition ~~3.7~~ 3.8 of this Order.

Section 1.6 of the proposed Order's Monitoring and Reporting Program has been modified as follows:

1.6. Discharge Monitoring Report Quality Assurance (DMR-QA) Study.

All Discharge Monitoring Report Quality Assurance (DMR-QA) Study. The Permittee shall participate in the DMR-QA program and ensure that the results of the DMR-QA Study or the most recent Water Pollution Performance Evaluation Study from each laboratory providing testing services for the permit are submitted annually to the State Water Board at qualityassurance@waterboards.ca.gov. For more information on the DMR-QA Program, contact the State DMR-QA Coordinator at the aforementioned email address.

Table E-2 of the proposed Order's Monitoring and Reporting Program has been modified as follows:

Table E-2. Influent Monitoring – Monitoring Location INF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ⁽¹⁾
Influent Flow ⁽²⁾	mgd	Meter	Continuous	--
Biochemical Oxygen Demand 5-day @ 20°C (BOD ₅)	mg/L	24-hr Composite	Weekly	Standard Methods
Total Suspended Solids (TSS)	mg/L	24-hr Composite	Weekly	Standard Methods
CTR and Title 22 Pollutants ⁽³⁾	mg/L µg/L	24-hr Composite ⁽⁴⁾	Once per permit term ⁽⁵⁾	Standard Methods
<p>Table Notes</p> <ol style="list-style-type: none"> In accordance with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136. The Permittee shall report the daily average and monthly average flows. Those pollutants identified by the California Toxics Rule at 40 C.F.R. section 131.38 and for which DDW has established MCLs at title 22, division 4, chapter 15, sections 64431 (Inorganic Chemicals) and 64444 (Organic Chemicals) of the CCR. Duplicate analyses are not required for pollutants that are identified as CTR and title 22 pollutants. CTR priority pollutant samples shall be collected using 24-hour composite sampling, except for pollutants that are volatile. Samples for volatile pollutants may be collected as a grab sample. <u>CTR priority pollutant sampling shall be completed between January 1 and December 31, 2027.</u> CTR priority pollutant sampling shall be completed no later than December 31, 2027. 				

Table E-9 of the proposed Order's Monitoring and Reporting Program has been modified as follows:

Table E-6 E-9. Groundwater Monitoring – Monitoring Locations GW-001 through GW-005

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method ⁽¹⁾
Surveyed Groundwater Level ⁽²⁾	feet	--	Quarterly ^(2,3)	--
pH	standard units	Grab	Quarterly ^(2,3)	Standard Methods
Sodium	mg/L	Grab	Quarterly ^(2,3)	Standard Methods
Nitrate Nitrogen, Total (as N)	mg/L	Grab	Quarterly ^(2,3)	Standard Methods
Nitrite Nitrogen, Total (as N)	mg/L	Grab	Quarterly ^(2,3)	Standard Methods
Specific Conductance @ 77°F	µmhos/cm	Grab	Quarterly ^(2,3)	Standard Methods
Total Dissolved Solids	mg/L	Grab	Quarterly ^(2,3)	Standard Methods
Oxidation Reduction Potential (ORP)	millivolts	Grab	Quarterly ^(2,3)	Standard Methods
Dissolved Oxygen	mg/L	Grab	Quarterly ^(2,3)	Standard Methods
Temperature	°C or °F	Grab	Quarterly ^(2,3)	Standard Methods

Table Notes

- In accordance with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136.
- ~~Monthly sampling shall occur during periods that the Permittee is discharging to the Russian River at Discharge Point 001. The sampling shall occur concurrently with receiving water monitoring at RSW-001 and RSW-002.~~
- Quarterly sampling shall occur in February, mid-May, July, and October. The mid-May sampling shall coincide with the annual sampling identified in Footnote 4 of this table.
- Each year between May 15 and May 21, the Permittee shall sample the receiving water for these parameters concurrently with effluent monitoring at Monitoring Location EFF-002 and groundwater monitoring.

Section 4.1.3 of the proposed Order's Fact Sheet has been modified as follows:

- 4.1.3. **Discharge Prohibition 3.3.** The discharge of sludge or digester supernatant is prohibited, except as authorized under section 6.3.4.2 of this Order (Sludge Disposal and Handling Requirements).

This prohibition has been retained from Order No. ~~R1-2012-0068~~ R1-2018-0035 and is based on restrictions on the disposal of sewage sludge found in federal regulations [40 C.F.R. part 503 (Biosolids), part 527, and part 258] and title 27 of the CCR.

Section 4.2.1.1.1 of the proposed Order's Fact Sheet has been corrected as follows:

4.2.1.1.1. **BOD₅ and TSS**

4.2.1.1.1.1. The 30-day average shall not exceed ~~40~~ 30 mg/L.

4.2.1.1.1.2. The 7-day average shall not exceed ~~45~~ 45 mg/L.

Section 4.2.1.1.2.2 of the proposed Order's Fact Sheet has been modified as follows:

4.2.1.1.2.2. ~~The effluent limitation for pH required to meet the water quality objective for hydrogen ion concentration (pH) is contained in the Basin Plan, Table 3-1. The pH effluent limitation for the Russian River upstream of Laguna de Santa Rosa is 6.5 to 8.5 as specified in the Basin Plan, Table 3-1.~~

Section 4.7 of the proposed Order's Fact Sheet has been modified as follows:

4.7. **Recycling Specifications**

Water Recycling Specifications and Requirements are contained in section 4.3 of the Order. The Permittee has submitted an NOI for coverage under the Recycled Water General Order and received a Notice of Applicability (NOA) to distribute recycled water to authorized use sites for approved recycled water uses; therefore, this Order does not include specifications or requirements for uses of recycled water. All of the water recycling specifications are based on the technical capabilities of the ~~proposed upgrades to the~~ wastewater treatment system and levels required by the Basin Plan and title 22.

Section 4.7.3 of the proposed Order's Fact Sheet has been modified as follows:

4.7.3. **Determining the Need for Requirements for Water Recycling**

Section 4.3 of this Order contains Water Recycling Specifications and Requirements to ensure that the recycled water produced by this Facility meets minimum requirements for the protection of groundwater and surface water. The Water Recycling Specifications are established in this Order to conform to requirements contained in title 22, division 4, chapter 3 of the CCR for the recycling use of disinfected tertiary-2.2 recycled water. The Permittee is required

to comply with applicable state and local requirements regarding the production and use of recycled wastewater, including requirements of Water Code sections 13500 – 13577 (Water Reuse) and DDW regulations at title 22, sections 60301 – 60357 of the CCR (Water Recycling Criteria). ~~The Permittee has submitted an NOI for coverage under the Recycled Water General Order and will obtain coverage prior to delivering recycled water.~~ The Permittee submitted an NOI for coverage under the Recycled Water General Order and obtained coverage prior to delivering recycled water. As such, this Order does not include use area requirements, but rather only contains requirements for the production of recycled water.

Section 4.7.4 of the proposed Order's Fact Sheet has been modified as follows:

4.7.4. Satisfaction of Antidegradation Policy

The permitted discharge is consistent with the antidegradation provisions of State Water Board Resolution No. 68-16. This Order does not provide for an increase in the volume and mass of pollutants discharged. The discharge will not have significant impacts on the beneficial uses of groundwater because the Order does not authorize the discharge of treated wastewater to groundwater.

In addition, the Recycled Water General Order addresses antidegradation for the storage and use of recycled water and the Permittee's enrollment under the Recycled Water General Order requires groundwater monitoring in a recycled water use area to verify that the use of recycled water does not adversely impact groundwater. ~~The recycled water storage pond has been designed with a synthetic liner to ensure that recycled water does not leak to groundwater.~~ The recycled water storage ponds were constructed with a synthetic liner to ensure that recycled water does not leak to groundwater.

Section 7.2.3.4 of the proposed Order's Fact Sheet has been modified as follows:

- 7.2.3.4. The Permittee discharges to the Russian River at Discharge Point 001 as necessary when influent flows exceed ~~the treatment and storage capacity~~ capacity of the recycled water distribution system, recycled water storage ponds, and percolation ponds of the Facility. To ensure adequate data is available to conduct an RPA for the next permit renewal, if discharge to the Russian River does not occur during the permit term, this Order requires sampling for priority pollutants at Monitoring Location EFF-002 in the fourth year of the permit term and during the discharge season (i.e., October 1 through May 14).

Select lines of Attachment F-1 of the proposed Order's Fact Sheet has been modified as follows:

Attachment F-1. Wastewater Treatment Facility RPA Summary

Pollutant	Units	MEC ¹	B	C	CMC	CC	Water & Org ²	Org Only ³	MCL	RP ⁴
Mercury	ng/L	1.84	--	12	--	--	50	--	2,000	Yes <u>No</u>
Selenium	µg/L	3.8 <2.0	--	5	--	5	--	--	50	No
Silver	µg/L	1.3 <0.8	--	2.0	2.0	--	--	--	--	No
Bromoform	µg/L	<3.0	--	4.3	--	--	4.3	--	--	No
2-Chloroethyl vinyl ether	µg/L	≤0.7	--	No Criteria	--	--	--	--	--	Uo ⁶

Staff Initiated Changes:

The following section describes changes made to the Draft Permit, initiated by Regional Water Board staff to provide clarification to the Proposed Permit.

Table Note 10 of Table E-4 of the proposed Order's Monitoring and Reporting Program has been removed because acute whole effluent toxicity monitoring is not required in the proposed Order, as shown below:

10. ~~Monitoring for ammonia shall be concurrent with acute whole effluent toxicity monitoring (section 5.1.1 of this MRP). Effluent and receiving water temperature and pH shall be recorded at the time of the ammonia sample.~~