



June 25, 2018

Matthias St. John
Executive Officer
Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403
By email: northcoast@waterboards.ca.gov

Subject: Comments on Tentative Order Issued for the City of Ukiah Wastewater Treatment Plant (Reissuance of NPDES Permit No. CA0022888)

Dear Mr. St. John:

The City of Ukiah (City) has reviewed the Tentative Order issued by the North Coast Regional Water Quality Control Board on May 25, 2018. The following comments are submitted prior to the June 25, 2018 deadline to be considered for inclusion in the final adopted NPDES permit. For requested revisions to the text of the T.O., underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

- 1. Monitoring Location INT-002 is referenced in multiple locations within the Tentative Order, but is not defined in Attachment E (Monitoring and Reporting Program). INT-002 may be the same sampling point as the locations defined for EFF-001A and REC-001. The City requests a description for Location INT-002 in Table E-1 (page E-4) or removal of the references to INT-001 and EFF-001 or REC-001 be substituted for INT-002 monitoring requirements.**
- 2. As specified in other permits adopted by the North Coast Regional Water Quality Control Board (e.g., City of Healdsburg, RRCSD), compliance with groundwater limitations should be based on “statistically significant” impacts to groundwater quality. The following change is requested to clarify the process that will be used to evaluate compliance with groundwater limitations.**

Groundwater Limitations V.B. [page 12]

- 1. The collection, treatment, storage, and disposal of wastewater or use of recycled water shall not cause statistically significant degradation of groundwater quality unless a technical evaluation is performed that demonstrates that any degradation that could reasonably be expected to occur, after implementation of all regulatory requirements ...**
- 3. Reasonable potential for Total Trihalomethanes (TTHMs) was determined by summing the maximum effluent concentrations (MEC) of bromoform, CDBM, DCBM, and chloroform measured in samples collected on different days during the permit term.**

As a result, the resulting MEC for TTHMs (80.5 µg/L, Table F-6) is a manufactured value and is not representative of actual effluent discharge conditions. The MEC should be calculated using results measured in samples collected on the same day to evaluate the risk of causing or contributing to exceedance of the water quality objective.

When TTHM concentrations are calculated correct, the maximum value was 77.08 µg/L (measured in a sample collected on 3/18/15) which is less than the water quality objective of 80 µg/L. The City requests modifications to the Tentative Order to remove the finding of reasonable potential, remove the effluent limit for TTHMs (Table 4, page 6), and eliminate monthly monitoring for chloroform and bromoform (Table E-4, page E-6).

4. The water quality objective for dibromochloromethane is mistakenly shown as 0.401 µg/L in the Tentative Order. The original publication of 40 CFR Part 131 Publication (5/18/00) included an incorrect objective of 0.401 µg/L for dibromochloromethane. The value was corrected to 0.41 µg/L in Federal Register Vol. 66, No. 30 (2/13/01). Corrections to the Tentative Order are required in Table F-5 (page F-29), Attachment F-1 (page F-63), and the following section.

Determining the Need for WQBELs IV.C.3.c. [page F-31]

Chlorodibromomethane. The CTR establishes a water quality objective for the protection of human health for chlorodibromomethane of ~~0.401~~ 0.41 µg/L. The Permittee sampled the effluent for chlorodibromomethane 35 times during the term of Order No. R1-2012-0068.

Chlorodibromomethane was detected in the effluent in five of these samples, with results ranging from non-detect to 4.3 µg/L. No receiving water samples were collected for chlorodibromomethane. A determination of reasonable potential has been made based on the MEC of 4.3 µg/L exceeding the most stringent water quality objective of ~~0.401~~ 0.41 µg/L.

5. The City requests permit reopener provisions to allow a possible alternative approach for meeting Salt and Nutrient Management Plan requirements (after adoption of the proposed Recycled Water Policy Amendment) and to conduct a mixing zone study to receive dilution credits or identify alternate downstream monitoring locations. The following changes to the Tentative Order are recommended.

Reopener Provisions VI.C.1 [page 14, 15]

- g. **Salt and Nutrient Management Plans (SNMPs).** The Recycled Water Policy adopted by the State Water Board on February 3, 2009, and effective May 14, 2009, recognizes the fact that some groundwater basins in the state contain salts and nutrients that exceed or threaten to exceed water quality objectives in the applicable Basin Plans, and that not all Basin Plans include adequate implementation procedures for achieving or ensuring compliance with the water quality objectives for salt or nutrients. The Recycled Water Policy finds that the appropriate way to address salt and nutrient issues is through the development of regional or sub-regional SNMPs rather than through imposing requirements solely on individual recycled water projects. This Order may be reopened to incorporate provisions consistent with any SNMP(s) adopted by the Regional Water Board or subsequent amendments to the Recycled Water Policy.
- i. **Mixing Zone Study.** This Order may be reopened for modifications to effluent limitations or receiving water monitoring locations if a mixing zone study provides a basis for determining a permit conditions should be modified.

6. **The City requests approval to collaborate with other POTWs to determine the presence of freshwater mussels or to establish site specific ammonia criteria in the receiving water. The collaborative studies would be conducted with other dischargers in the Russian River Watershed or in conjunction with California dischargers that identify the same mussel species in their receiving waters. The following revisions are suggested to provide authorization for an optional, collaborative approach.**

Special Studies, Technical Reports and Additional Monitoring Requirements VI.C.2. [page 15]

- b. **Ammonia Study.** The Permittee shall conduct a study on its own or in collaboration with other dischargers to determine the presence of freshwater mussels in the receiving water or to calculate site specific criteria to support implementation of the water quality criteria for ammonia in the April 2013 *Aquatic Life Ambient Water Quality for Ammonia – Freshwater 2013* (EPA-822-R-13-001).
7. **The new requirement to conduct water quality monitoring of groundwater seeps may be difficult to implement when seep flowrates are low or there is no flow. Contingency options should be provided in the permit to guide City and Regional Water Board decisions on whether or not a sample can be collected and which analyses will be conducted. The City is recommending the following contingency language for Regional Water Board consideration.**

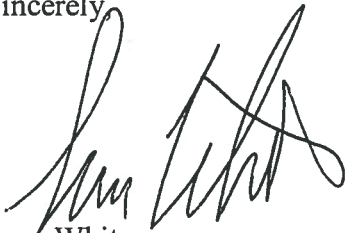
Seep Monitoring (SEEP-001) [page E-23]

2. The Permittee shall monitor any observed groundwater seeps at Monitoring Location SEEP-001, SEEP-002, etc. as follows:¹

¹ If the seep flow is lower than practicable for sample collection, only bottles that can be filled within one hour will be filled and analyzed. If the full volume for all analyses can't be collected, analyte priorities will be discussed with the Regional Water Board prior to analysis. A description of the sampling event, the flow limitations, and selected analytes will be described in the next quarterly self-monitoring report.

The City appreciated your assistance and communication during development of this Tentative Order. Please contact me at 707-467-5712 (or by email, swhite@cityofukiah.com) if you have any questions on the attached comments.

Sincerely,



Sean White

Director of Water Resources