

**From:** [Denise Conners](#)  
**To:** [VonLangen.Peter@Waterboards](mailto:VonLangen.Peter@Waterboards)  
**Subject:** Questions and Potential Changes to the M1W Revised T.O.  
**Date:** Thursday, November 29, 2018 12:11:46 PM

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Hi Peter,

I just left a phone message for you and am following up with this email. I reviewed the revised T.O. and talked with M1W. We have some questions and identified some minor corrections that should be addressed before the permit is adopted. Please give me a call to discuss in detail.

1. Page 2 – Why is the permit term only 4 years, 8 months (April 1, 2019 to November 30, 2023)? Can it be extended to cover the full 5 years (April 1, 2019 to March 31, 2024)?
2. Page 4 – Typo, wrong subsection referenced. The proposed change is shown below.  
*C. Provisions and Requirements Implementing State Law. The provisions/requirements in subsections IV.B, IV.C, V.B, ~~V.C.5.d~~, VI.C.5.d, and VI.C.5.c. of this Order and Sections VI and VII of the Monitoring and Reporting Program are included to implement state law only.*
3. Page E-6 – Table E-2 (Influent monitoring at INF-001) does not specify the monitoring frequency for Pretreatment Requirements. Footnote [3] points to the Order and the MRP for guidance, but the frequency isn't specified in these sections either. The current permit (Page E-17) states "At least once per year, influent, effluent, and biosolids shall be sampled in the analyzed for the priority pollutants..." Can you add this language to Table E-2 or in MRP Section IX.C?
4. Page E-8 – Footnote [17] to Table E-4 includes a requirement to report PCBs as congeners and Aroclors, and to conduct IHVWS sampling. The Ocean Plan includes a water quality objective for Total PCBs that is based on the total concentration of Aroclors. The approved method for PCBs compliance is EPA Method 608 which only provides results for Aroclors. M1W monitors effluent PCBs as congeners (for informational purposes) under the CCLEAN program as specified in Table E-15. The specification to use IHVWS sampling techniques remains in Footnote [17] even though it was deleted from the effluent monitoring requirements. The proposed change to address PCB monitoring and IVHWS sampling is shown below.

*[17] In order to collect representative samples, from each of the 4 Dms 24-hour composite samples may be collected to monitor Ocean Plan and Remaining Priority Pollutants. ~~All PCB congeners shall be reported in addition to Aroclors. The Discharger shall utilize the integrative high-volume water sampling (IHVWS) such as SPMD or those deployed by CCLEAN to meeting CCLEAN monitoring obligations.~~*

5. Page E-17 – Incorrect footnote number for chlorine residual reporting, should be [2].  
*Chlorine Residual* ~~[3]~~ [2]
6. Page F-5 – The SVRP plant is described incorrectly as an advanced treatment plant. SVRP

produces tertiary recycled water utilizing filtration and chlorine disinfection. There is not advanced treatment involved.

*The SVRP is an ~~advanced~~ tertiary treatment plant adjacent to the Regional WWTP that receives secondary effluent from the Regional WWTP and provides recycled water for irrigation of 12,000 acres of farmland in the northern Salinas Valley.*

7. Page F-37 – The heading identifier for the “Special Provisions” section should be changed from K. to B.

*B. ~~K.~~ Special Provisions*

Thank you!

-Denise

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