

Central Valley Regional Water Quality Control Board
12/13 June 2008 Board Meeting

Response to Comments for the City of Roseville
Pleasant Grove Wastewater Treatment Plant
Tentative Waste Discharge Requirements and Time Schedule Order

The following are Regional Water Quality Control Board, Central Valley Region (Regional Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit renewal) and Time Schedule Order (TSO) for the City of Roseville, Pleasant Grove Wastewater Treatment Plant. Public comments regarding the proposed Orders were required to be submitted to the Regional Water Board by 5:00 p.m. on 5 May 2008 in order to receive full consideration.

The Regional Water Board received comments regarding the proposed NPDES Permit renewal and TSO by the due date from the City of Roseville (Discharger). The submitted comments were accepted into the record, and are summarized below, followed by Regional Water Board staff responses.

CITY OF ROSEVILLE (DISCHARGER) COMMENTS

Discharger Comment No. 1. Compliance Schedules - The Discharger requested in-permit compliance schedules through 18 May 2010 for the following California Toxic Rule (CTR) constituents: cadmium, zinc, cyanide, dibromochloromethane, and dichlorobromomethane. Because the in-permit compliance schedules are unable to provide adequate time to ensure compliance with the final effluent limits for these constituents, the Discharger also requests that the Regional Water Board adopt a TSO for these constituents that provide concurrent, yet longer, time schedules. The TSO should be effective upon permit adoption and provide the Discharger protection from mandatory minimum penalties for the additional time necessary, beyond the 18 May 2010 CTR compliance date, to comply with final effluent limits for the CTR constituents. The Discharger has provided appropriate justification for the in-permit compliance schedules and the additional time schedules in the TSO that will protect the Discharger from mandatory minimum penalties. The Discharger requests the following additional time schedules in the TSO:

- Compliance with the final effluent limits for cadmium and zinc by 31 May 2013;
- Compliance with the final effluent limits for cyanide by 31 May 2013; and
- Compliance with final effluent limits for dibromochloromethane and dichlorobromomethane by 31 December 2012.

In all cases, the request for protection from mandatory minimum penalties will not cause the TSO to exceed five (5) years, and all time schedules in the TSO are as short as possible.

The Discharger also finds that it will take five (5) years to comply with the final effluent limitation for fluoride. The Discharger has identified the main source of fluoride to be from the industrial discharger, NEC Electronics Company (NEC). Fluoride found in NEC's discharge to the collection system comes from hydrofluoric acid, which is an essential compound used in the chip manufacturing process. The Discharger is currently working with NEC regarding the need to reduce fluoride concentrations in NEC's discharge to the Pleasant Grove Wastewater Treatment Plant. While NEC and the Discharger both realize that the reduction of fluoride is necessary, it will take some time for the Discharger and NEC to resolve the issue. For example, the Discharger will need to locally enforce a fluoride limit in NEC's next industrial discharge permit. Additionally, NEC will need to research and explore options related to changes in the manufacturing process or identify appropriate pretreatment processes for removing fluoride from the industrial discharge. To allow the Discharger and NEC time to address the issue, the Discharger requests that the Regional Board adopt a TSO that includes a five year compliance schedule. The TSO proposes to provide the Discharger protection from mandatory minimum penalties through May 31, 2013.

Additionally, the following items need to be addressed in the tentative documents:

1. In Section IV.A.3 (page 15) of the proposed NPDES Permit, the tables and compliance dates should be consistent with the Update to the Infeasibility Analysis (Attachment 1) and interim effluent limits should also be consistent with those listed in the Revised Time Schedule Order (including the Discharger's comments on the TSO).
2. Section VI.C.7.a (page 35), Compliance Schedules, of the proposed NPDES Permit, needs to be consistent with other sections (e.g., IV.A.3) and the TSO that incorporates the Discharger's comments. Therefore, in addition to interim limits for cadmium and zinc, the proposed NPDES Permit should contain interim effluent limits for cyanide, dibromochloromethane, and dichlorobromomethane.
3. In Attachment F, Sections IV.C.3.i (page F-22 for cadmium) and IV.C.3.cc (page F-34 for zinc) should be revised to reflect the need for a five year compliance schedule that would be included in the TSO and that would be effective upon permit adoption. The Discharger's recommended revisions for both of the referenced sections of the Fact Sheet are:

~~Based on the Discharger's performance in implementing their correctly action plan to comply by 18 May 2010, the Regional Water Board may consider at a future date issuance of a Time Schedule Order to provide additional time to comply with the final effluent limits for [zinc/cadmium].~~
The Discharger has indicated that additional time may be necessary to comply with final effluent limitations for [cadmium/zinc] beyond 18 May 2010. To allow for additional time beyond 18 May 2010, a time schedule

order for compliance with [cadmium/zinc] final effluent limitations is established in Order No. R5-2008-xxxx in accordance with CWC sections 13300 and 13385. Order No. R5-2008-xxxx also requires preparation and implementation of a pollution prevention plan in compliance with CWC section 13263.3.

4. In Attachment F, Section IV.E (page F-47), the Interim Effluent Limitations needs to be changed commensurate with the Update to the Infeasibility Analyses and the corrected TSO.
5. In Attachment F, Section VII.B.7.a (page F-63) should include all constituents for which compliance schedules have been requested. Specifically, cyanide, dibromochloromethane, and dichlorobromomethane should be added to this section. Additionally, the time requested for compliance should be consistent with the Update to the Infeasibility Analyses.
6. The TSO should include compliance schedules and interim effluent limits for cadmium and zinc as requested in the updated Infeasibility Analyses.
7. On page 5 of the TSO, the date for achieving full compliance with dibromochloromethane and dichlorobromomethane is 1 January 2012. The Discharger requests that this date be 1 January 2013 to be consistent with the schedule in the Update to the Infeasibility Analyses.
8. In Provision No. 2. (page 6) of the TSO, the date through which the interim limits for dibromochloromethane and dichlorobromomethane are effective is incorrectly shown as 31 December 2011. The Discharger requests that this date be 31 December 2012 to be consistent with the schedule in the Update to the Infeasibility Analyses.
9. The interim effluent limit for fluoride on page 6 of the TSO is listed as 11,200 ug/L as a maximum daily effluent limitation. The final effluent limit in the proposed NPDES Permit is a calendar year concentration. The Discharger requests that the interim limit be on a calendar year basis to be consistent with the final effluent limit in the proposed NPDES Permit.
10. All dates shown in Order No. 1 on page 5 of the TSO should be consistent with the dates in the Update to Infeasibility Analyses and the applicable sections of the proposed NPDES Permit.

RESPONSE: Regional Water Board staff concludes that compliance schedules are to be either in the permit or in an enforcement order, but not in both due to conflicting requirements associated with the California Toxic Rule compliance date of May 2010 for in-permit compliance schedules. Based on the anticipated

compliance dates included in the Discharger's Infeasibility Study (dated 19 March 2008 and amended on 2 May 2008), staff concludes that it is appropriate to include time schedules in the TSO only, for the Discharger to achieve compliance with final effluent limitations for cadmium, cyanide, dibromochloromethane, dichlorobromomethane, fluoride, and zinc. Time schedules for compliance with final limitations for these constituents are therefore not included in the proposed NPDES Permit.

Through staff discussion with the Discharger regarding measures necessary to comply with the final effluent limitations for cyanide, the cyanide compliance date has been modified from 31 May 2013 to 1 January 2013. This modification is based on staff's conclusion that monitoring and analysis procedures for cyanide, as well as planned source identification efforts, should be initiated concurrently with, not subsequent to, the implementation of the ultraviolet light (UV) light disinfection system.

Regional Water Board staff do not concur with the request that the interim limit for fluoride be on a calendar year basis to be consistent with the final effluent limit in the proposed NPDES Permit. The statistical methodology used to derive the interim limitations assumes that the resulting limitations would be applied as a maximum daily effluent limitation, and therefore the interim effluent limitation will be applied as a maximum daily.

Discharger Comment No. 2. Total Residual Chlorine - The Discharger commented that the final effluent limitations for Total Residual Chlorine in Sections IV.A.1.d (page 13) and IV.A.2.d (page 14) of the proposed NPDES Permit indicate a need to measure total residual chlorine to the one-thousandth (1/1000th) mg/L (e.g. 0.01 $\underline{1}$ mg/L, as a 4-day average; and 0.01 $\underline{9}$ mg/L, as a 1-hour average). The Discharger understands that these limits are derived from a draft State Water Resources Control Board (State Water Board) policy for statewide chlorine limitations. However, there has been much concern regarding the ability of continuous monitoring equipment (e.g. on-line chlorine analyzers) to measure, in the field, to this level of accuracy. These concerns have been expressed by on-line chlorine analyzer manufacturers, consulting engineers and the Instrumentation Testing Association (ITA) and presented as formal public comments to the State Water Board. The comments are summarized below:

- On-line (i.e. amperometric) chlorine analyzers are susceptible to inaccuracy from a variety of common interferents. Depending on the residual concentration being measured, the following interferents can create inaccuracies:
 - (1) Dissolved Oxygen
 - (2) Bromine
 - (3) Iodine

- (4) Sulfites
- (5) Sulfides

- Published on-line chlorine analyzer accuracies can vary from 1% to 5% of the reading, or 0.002 mg/L to 0.010 mg/L, whichever value is greater, for a typical analyzer spanned to 10 mg/L range. Manufacturer-stated sensitivity is 0.001 mg/L; however the accuracy is, at a minimum, two times greater than the stated sensitivity. These stated sensitivities apply during bench-top studies, not during field applications. Field applications have significantly lower sensitivities as discussed below.

The Discharger additionally comments that although a chlorine analyzer provides a reading with digits to the one-thousandth mg/L, there is little significance to the value indicated in the one-thousandth column. Based on our 15 years of optimizing online chlorine analyzers for process control and compliance reporting, it is the Discharger's experience that the field application of these online analyzers, considering the calibrations and maintenance, can only be relied upon to accurately measure to the one-hundredth mg/L in wastewater effluent. Therefore, the Discharger requests that the total chlorine residual effluent limitations be revised to:

- i. 0.01 mg/L, as a 4-day average; and*
- ii. 0.02 mg/L, as a 1-hour average*

These limits are as protective of the receiving water aquatic life as the more stringent limitations in the proposed NPDES Permit and will allow real in-field measurements of chlorine residual and dechlorination agent. The Discharger cannot provide any measurement device that reliably, in the field, measures to the one-thousandth mg/L. Commensurate changes should be made in Attachment F, Section IV.C.3 .j, in the first full paragraph on p. F-23 of the proposed NPDES permit.

Additionally, in Section IV.A.2.d, top of page 15. the sentence: '*This limitation applies...is used at the facility.*' should be replaced with the language from Section IV.A.1.d: '*The total residual chlorine effluent limitation are effective until the Discharger submits written certification that a chlorine-based disinfection system is not longer in use and chlorine-containing chemicals are not added to the treatment process for wastewater discharged to the receiving water.*'

RESPONSE: Page 111 of USEPA's *Technical Support Document for Water Quality-based Toxics Control* (EPA/505/2-90-001) or TSD suggests that, in situations where the expression of calculated limitations for specific chemicals where the concentration of the limitation is below the analytical detection level for the pollutant of concern, the permitting authority should include the appropriate permit limitation, regardless of the proximity of the limit to the analytical detection level. The TSD suggests that the compliance level be defined in the permit as

the minimum level (ML). Additionally, section 2.4.5 of the SIP states, in part, that “*Dischargers shall be deemed out of compliance with an effluent limitation, if the concentration of the priority pollutant in the monitoring sample is greater than the effluent limitation and greater than or equal to the RL.*” (Although the SIP applies directly to the control of California Toxics Rule (CTR) priority pollutants, the State Water Board has held that the Regional Water Board may use the SIP as guidance for water quality-based toxics control.¹) On this basis, Regional Water Board staff disagrees that the total chlorine residual effluent limitations in the proposed NPDES Permit be adjusted to accommodate the sensitivity of analytical methods.

Staff does, however, acknowledge the issues associated with determining compliance with the total residual chlorine effluent limitations due to analytical limitations, and has therefore included compliance determination language in section VII.E of the proposed NPDES Permit. The compliance determination language at section VII.E of the proposed permit specifies that, for dischargers that dechlorinate, monitoring showing a positive dechlorination agent residual is sufficient to show compliance with the total residual chlorine effluent limitations. Additionally, footnote 2 in Table E-3 of Attachment E, Monitoring and Reporting Program (MRP) has been revised to acknowledge the analytical method detection level that must be achieved when monitoring for total residual chlorine (0.01 µg/L; representing the most sensitive analytical method approved by EPA).

Through its comment above, the Discharger also requested that the total residual chlorine effluent limitations become ineffective upon certification that chlorine and/or chlorine-containing agents are no longer in use at the treatment plant due to installation of the UV light disinfection system. Staff does not concur with this request and believes that the total chlorine residual effluent limitations must remain effective throughout the term of this permit or until the permit is modified accordingly. However, to address the Discharger’s comment, in place of making the effluent limitations ineffective upon certification of no use of chlorine in the treatment process, the proposed MRP has been modified to remove the required compliance monitoring for chlorine upon Discharger certification of non-use. This approach negates the need for the Regional Water Board to reopen the NPDES permit should the Discharger, during the life of the permit, decide to initiate the use of chlorination in the treatment process.

Discharger Comment No. 3. Compliance Determination Language - The Discharger comments that the compliance determination language in Section VII (page 36) of the proposed NPDES Permit should be revised to include a provision for Effluent Mass Limitations. The Discharger recommends that the proposed NPDES Permit includes

¹ See Order WQO 2001-16 (Napa) and Order WQO 2004-0013 (Yuba City).

language similar to other Central Valley Regional Water Board NPDES permits (e.g., City of Tracy – Order No. R5-2007-0036 and City of Vacaville –Order No. R5 -2008-0055). The following language should be added to Section VII on p. 37:

Effluent Mass Limitations. The effluent mass limitations contained in Final Effluent Limitations IV.A.1.a. and Interim Effluent Limitations IV.A.2.a. are based on the permitted average dry weather flow calculated as follows:

Mass (lbs/day) = Flow (mgd) x Concentration (mg/L) x 8.34 (conversion factor)

If the effluent flow exceeds the permitted average dry weather flow due to wet weather storm events, or is outside the three consecutive dry weather months or when groundwater is above normal and runoff is occurring, the effluent mass limitations contained in Final Effluent Limitations IV.A.1.a. and Interim Effluent Limitations IV.A.2.a shall not apply.

RESPONSE: Regional Water Board staff concurs that compliance determination language regarding mass limitations should be added to Section VII of the proposed NPDES Permit, staff disagrees with the exact language proposed by the Discharger. A new subsection in Section VII has been added to the NPDES Permit specifying that compliance with mass-based limitations will be determined during average dry weather flow periods only.

Discharger Comment No. 4. Use of Inhibition Concentration – 25 Percent (IC25)

Evaluation of Chronic Toxicity - The Discharger requests that the following statement be added after the first sentence in Section VI.C.2.a. iii. (page 25) of the proposed NPDES Permit,:

IC25 may be substituted for NOEC at the discretion of the Executive Officer.

The Discharger requests the option of substituting the IC25 for the No Observed Effects Concentration (NOEC) when measuring toxicity in the effluent. The Discharger currently reports toxicity as TU = 100/IC25. The Discharger believes that the IC25 method is a more dependable approximation of the no effect level and provides a better indication of the ability to see an effect in the toxicity test. This perspective is supported by USEPA. USEPA has consistently recommended the use of point estimates (e.g., IC25) rather than hypothesis tests to analyze whole effluent toxicity data since the issuance of the *Technical Support Document for Water Quality-based Toxics Control* in 1991. (TSD, EPA/505/2-90/001, page 6). In the TSD, the USEPA discusses the relative merits and limitations of both techniques, and concludes, “comparisons of both types of data indicate that an IC25 is approximately the analogue of an NOEC derived using hypothesis testing. For the above reasons, if possible, the IC25 is the preferred statistical method.”

RESPONSE: The No Observed Effect Concentration (NOEC) method is required in NPDES permits to calculate chronic toxic units because the NOEC endpoint represents no toxicity. This is consistent with the Regional Water Board Basin Plan's narrative toxicity objective and toxicity testing required in the other Regional Water Board's regulatory programs.

The point estimate, IC25, assumes that some level of toxicity is acceptable. The selection of an acceptable level of toxicity to ensure compliance with the narrative toxicity objective is not consistent with the Basin Plan narrative toxicity objective. Staff believes that approval of a future use of the IC25 chronic toxicity assessment in an NPDES permit is an amendment that should have Regional Water Board approval. If the IC25 chronic toxicity assessment method becomes acceptable to the Regional Water Board prior to the next renewal of the NPDES permit, the permit may be modified accordingly through the adoption of a Regional Water Board resolution.

Discharger Comment No. 5. Monitoring and Reporting Program (MRP) General Provisions - The first sentence of Section I.C is repetitious with respect to I.B. on p. E-1, and the Discharger requests that it be deleted. Additionally, to simplify the reporting requirements, the Discharger requests that the requirement in the second sentence of I.C, to report all laboratories used, be changed to a requirement that only requires maintaining records of all laboratories used. The Discharger's justification is that, depending on the constituents, several laboratories may be used to perform the various analyses. In addition, the Discharger's laboratory services may change for other reasons including the Discharger purchasing guidelines and other City policies. The Discharger proposes maintaining records of all laboratories used as, in place of the reporting requirement described in Attachment E to the MRP. This change also necessitates a commensurate change in Section VI.A.2.n on p. 22.

RESPONSE: Although Regional Water Board staff concurs that language redundancy exists in the General Monitoring Provisions contained in Section I of the MRP, the proposed language remains unchanged since it is standard language NPDES permits adopted by the Regional Water Board. Change in this language will be considered when the standardized language in NPDES permits is revised. Regardless, the requirements remain unchanged.

Staff does not concur with the Discharger's request to maintain records of the laboratories that are used in lieu of reporting this information to the Regional Water board in the monthly self-monitoring reports (SMRs). Information regarding the laboratory used to gather monitoring data is part of the Regional Water Board's public monitoring record for this facility, and often used by staff in their review of monitoring reports.

Discharger Comment No. 6. Reporting Laboratories Used – The Discharger requests that in Provision VI.A.2.n on page 22 of the proposed NPDES Permit that ‘*and USEPA*’ be removed as EPA forms do not allow for entry of this information.

RESPONSE: Regional Water Board staff concurs with this comment and has made the suggested clarifications in the proposed permit.

Discharger Comment No. 7. Editorial Comments – The Discharger noted the following editorial comments:

1. Provision II.B. on page 5: 31.5 acres in the first full paragraph should be changed to 31.8 acres.
2. Provision II.B. on page 5: the phrase, “and addition of fine screens”, should be deleted from last sentence in the 3rd full paragraph to be consistent with Attachment F, Section II.E (page F-8).
3. Table 7 on page 14 contains an effluent limitation for 1,1-dichloroethylene. This limitation should be deleted to be consistent with Table 6 (page 12) and with Attachment F, Section IV.C.3.o. (page F-25).
4. In the first sentence of Section VI.C.4.b on page 30: “*to prevent*” is repeated. The sentence should be revised as follows:

The emergency storage basin shall be used only to prevent-to prevent discharge....

5. Provision VII.C.7 on page 37: ‘*e.g.*’ should be changed to ‘*i.e.*’.
6. In II.E. on page F-8: 31.5 acres should be changed to 31.8 acres and 49.5 million gallons should be changed to 65.1 million gallons to be consistent with Section II.B of the proposed NPDES Permit (page 5.).
7. Footnote 5 for Table F-5 on page F-15 should be revised as follows:

Based on permitted ADWF of 15 mgd. Effective ~~until~~ upon completion of upgrades to Facility.
8. The Discharger comments that the compliance date specified in Provision VI.C.2.c (page 28) of the proposed NPDES Permit should be corrected to read “*and/or 2 year*” instead of “*and/or ii years*”.

RESPONSE: Regional Water Board staff concurs and has made the suggested clarifications and corrections in the proposed NPDES Permit.

Discharger Comment No. 8. Influent Monitoring Location - The Discharger comments that the language in Table E-1 of Attachment E (page E-2): “prior to any treatment processes” should be deleted from the description of INF-001 to allow for sample collection at the most practical location. For example, influent samples are best collected downstream of the bar screens but, under certain interpretations, bar screens may be considered a treatment process.

RESPONSE: Regional Water Board staff concurs that influent samples may be taken downstream of the bar screen and has made the suggested edit.

Discharger Comment No. 9. Effluent Monitoring Location - The Discharger comments that the description of EFF-001 in Table E-1 of Attachment E (page E-2) should be revised to read “*Location(s) representative of...*” because it may be necessary to collect samples at more than one location downstream of the last treatment process to get representative effluent samples, depending on the constituent.

In footnote 3 of Table E-3 on p. E-4, the effluent monitoring locations are not at the outfall. The Discharger requests that this footnote be revised to read:

Effluent temperature monitoring shall be at EFF-001.

RESPONSE: Regional Water Board staff concurs and has made the suggested edits for clarification.

Discharger Comment No. 10. Sample Type and Monitoring Frequencies - The Discharger provided several comments related to the proposed monitoring sample type and frequencies:

1. On page E-3 of the Monitoring and Reporting Program, the Discharger requests that the monitoring frequency for bis (2-ethylhexyl) phthalate in Table E-3 be reduced from monthly to quarterly due to lack of any detected data above the water quality objectives. This is also consistent with the monitoring requirements for this constituent in the Dry Creek Wastewater Treatment Plant proposed NPDES Permit.
2. In Table E-3 of Attachment E on pages E-3 and E-4: the sample type should be changed to “*Grab*” for bis (2-ethylhexyl) phthalate, cyanide, dibromochloromethane, dichlorobromomethane, 1,1-dichloroethylene, fluoride, and nitrate. The sample type for persistent chlorinated hydrocarbon pesticides in Table E-3 should be changed to “*Composite*”.

3. In Table E-3 of Attachment E on pages E-3 and E-4, the Minimum Sampling Frequency for 1,1-dichloroethylene should be change from monthly to quarterly to be consistent with Attachment F, Section IV.C.3.o on page F-25.

RESPONSE: Regional Water Board staff concurs with the request to change the monitoring frequency for bis (2-ethylhexyl) phthalate in Table E-3 from monthly to quarterly and sample type from composite to grab. The Discharger detected bis (2-ethylhexyl) phthalate only once out of eight samples, and therefore the quarterly monitoring should be sufficient to monitor for the presence of the pollutant. Order No. 5-00-075 included 24-hour composite sampling for bis (2-ethylhexyl) phthalate, which typically requires the use of plastic sampling equipment. Since bis (2-ethylhexyl) phthalate is a common contaminant of sample containers, sampling apparatus, and analytical equipment, and sources of the detected bis (2-ethylhexyl) phthalate may be from plastics used for sampling or analytical equipment, use of a grab sample would reduce the potential for sample contamination.

Regional Water Board staff also concurs with the request from the Discharger that the sample type should be changed to grab for cyanide, dibromochloromethane, dichlorobromomethane, 1,1-dichloroethylene, fluoride, and nitrate. Use of grab samples for the volatile organics dibromochloromethane, dichlorobromomethane, 1,1-dichloroethylene is consistent with the sample type required in the previous Order (Order No. 5-00-075). Due to the potential for oxidizing agents to reduce cyanides during storage, staff believes use of a grab sample is warranted. Staff also believes that fluoride and nitrate levels within the treatment plant will not vary much over time, such that use of grab samples would be acceptable.

Regional Water Board staff also concurs with the request to change the sample type from “grab” to “composite” for persistent chlorinated hydrocarbon pesticides since the acceptable analytical methods allows a 7-day holding time for these pesticides, and composite sampling will provide more thorough characterization of the pesticide concentration in the effluent.

Discharger Comment No. 11. Whole Effluent Toxicity (WET) Report Submissions

- The Discharger comments that the last sentence of Section V.D.1, and Section V.D.2. on page E-7 of Attachment E, should refer to “quarterly” discharger self-monitoring reports instead of “monthly” discharger self-monitoring reports, to be consistent with the first sentence in V.D.1 that states “*chronic toxicity monitoring results shall be reported to the Regional Water Board on the schedule for quarterly sampling...*”

RESPONSE: Regional Water Board concurs and has corrected the language in the MRP.

Discharger Comment No. 12. pH Limitations - The Discharger comments that the pH of 9.0 on Table F-5 (page F-15) should be revised 8.0 to be consistent with Tables 6 and 7 (on pages 12 and 14, respectively).

RESPONSE: Regional Water Board staff does not concur with the suggested edits. The pH values in Table F-5 are the federal technology-based pH limitations, which are different from the State water quality-based pH effluent limitations (which serve as the basis for the pH limitations in Tables 6 and 7 of the proposed NPDES Permit).

Discharger Comment No. 13. Editorial Comment – The Discharger noted that in Table F-1 (page F-3), the row for Waste Discharge Identification Number (WDID) should be removed to be consistent with the Dry Creek Wastewater Treatment Plant proposed NPDES Permit.

RESPONSE: The row for WDID in Table F-1 was inadvertently left off the proposed NPDES Permit. The WDID is required in all permits. The Regional Water Board staff has therefore included the WDID in Table F-1.