

Central Valley Regional Water Quality Control Board
4/5 December 2008 Board Meeting

Response to Comments for the City of Colusa Wastewater Treatment Plant
Tentative Waste Discharge Requirements
(National Pollutant Discharge Elimination System (NPDES) Permit Renewal)

At its July 2008 Board Meeting, the Central Valley Regional Water Quality Control Board (Regional Water Board) continued the public hearing for the tentative NPDES Permit renewal for the City of Colusa Wastewater Treatment Plant. The following are Regional Water Board staff responses to comments submitted by interested parties regarding the subsequent September 2008 tentative NPDES Permit. Public comments regarding the limited scope of issues pertaining to the continued public hearing were required to be submitted to the Regional Water Board office by 5:00 p.m. on 13 October 2008 in order to receive full consideration.

The Regional Water Board received comments regarding the September 2008 tentative NPDES Permit by the due date from the City of Colusa (Discharger) and the Central Valley Clean Water Association (CVCWA). The submitted comments were accepted into the record, and are summarized below, followed by Regional Water Board staff responses.

CITY OF COLUSA (DISCHARGER) COMMENTS

Discharger Comment No. 1: Turbidity Monitoring Location and Chlorine Residual Sample Type – The Discharger states that the permit currently requires continuous turbidity measurement at the EFF-001 location. The turbidimeter it has in place at the treatment facility is located after the filters. The filters are followed by ultraviolet light disinfection, re-aeration basin and effluent pump station that are not likely to affect turbidity. The Discharger requests a modification to Footnote 3 of the Table E-3 to indicate that turbidity may be monitored after the filters.

Additionally, the Discharger states that the tentative Permit requires continuous chlorine analyzers to be used until "use of its chlorine-based disinfection system and the use of other chlorine-containing agents in its treatment process has been ceased" (Footnote 2, Table E-3). The Discharger states that chlorine is only kept onsite for maintenance purposes and to reduce bulking in the secondary treatment process. A continuous chlorine analyzer is not included in the new plant design, nor was it used at the old plant. The analyzer is relatively expensive and requires frequent maintenance. Therefore, the Discharger requests that chlorine monitoring type be "grab" instead of "continuous"

RESPONSE: Regional Water Board concurs that the turbidity monitoring can be performed on the filter effluent prior to entering the UV disinfection system, rather than at EFF-001. The purpose of the turbidity monitoring is to monitor the effectiveness of the filtration system, therefore, the change in monitoring location is appropriate. With regard to chlorine residual sampling, a grab sample is the appropriate sample type for chlorine monitoring at this treatment facility. The

September 2008 tentative Permit requires grab sampling for chlorine residual, and therefore remains unchanged. The Fact Sheet has been corrected to eliminate reference to continuous chlorine monitoring.

DISCHARGER and CVCWA COMMENTS

Discharger and CVCWA Comment No. 1: Compliance Determination Language for New Narrative Chronic Toxicity Effluent Limitation – The Discharger and CVCWA request that the language in Section VII. Compliance Determination, be modified to be consistent with other recently adopted NPDES permits, and to read as follows:

H. Chronic Whole Effluent Toxicity Effluent Limitation. Compliance with the accelerated monitoring and TRE/TIE provisions of Provision VI.C.2.a shall constitute compliance with the effluent limitation IV.A.1.i for chronic whole effluent toxicity.

RESPONSE: Regional Water Board staff concurs and has modified the identified section of the tentative Permit accordingly for consistency with other recently adopted NPDES permits.