

**LATE-LATE REVISIONS  
CITY OF LIVE OAK  
WASTEWATER TREATMENT PLANT  
SUTTER COUNTY  
Proposed NPDES Permit Renewal  
Regional Water Quality Control Board, Central Valley Region  
Board Meeting – 9/10 June 2011  
(Tabled from Board Meeting - 3 February 2011)  
ITEM # XX**

**Late-Late Revisions Proposed to NPDES Permit at 3 February 2001 Board Hearing:**

1. **NPDES Permit, Limitations and Discharge Requirements.** Modify Table 6 – Effluent Limitations, as shown in underline/strikeout format below:

**Table 6. Effluent Limitations**

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Total Trihalomethanes	µg/L	80	--	<del>162</del> --	--	--

2. **NPDES Permit, Fact Sheet (Attachment F), Section IV.C.3.d.viii. Total Trihalomethanes (THM).** Modify the Fact Sheet as shown in underline/strikeout format below:

**viii. Total Trihalomethanes (THM)**

- (a) **WQO.** DPH has adopted a primary MCL for total THM of 80 µg/L, which is protective of the Basin Plan's chemical constituent objective. Total Trihalomethanes is a primary MCL and a sum of four CTR constituents: bromoform, chloroform, dibromochloromethane, and dichlorobromomethane.
- (b) **RPA Results.** The Discharger did not sample for total THM, however, monitoring results of the four CTR constituents that typically comprise total THMs are shown in Table F-9. Chloroform concentration is often used as an indication of total THM concentration. The MEC for chloroform was 150 µg/L. Additionally, three of the four CTR constituents (chloroform, dibromochloromethane, and dichlorobormomethane) had MECs greater than the individual criterion, and the MEC sum of the four CTR constituents was 182.4 µg/L, which is greater than the primary MCL for total THMs of 80 µg/L. Therefore, total THM in the discharge has a reasonable potential to cause or contribute to an in-stream excursion above the primary MCL.

**Table F-910. Total THMs**

Parameter	Units	Criterion Basis	Criterion Standard	MEC
Bromoform	µg/L	CTR	4.3	<0.5
Chloroform	µg/L	CTR	80	150
Dibromochloromethane	µg/L	CTR	0.41	4.2
Dichlorobromomethane	µg/L	CTR	0.56	28.2
Total THMs <sup>1</sup>	µg/L	Primary MCL	80	182.4 <sup>1</sup>

<sup>1</sup> Total THMs is the additive total of bromoform, chloroform, dibromochloromethane, and dichlorobromomethane.

- (c) **WQBELs.** Title 40 CFR 122.45 (d) requires, in part, average monthly discharge limitations for publicly owned treatment works (POTWs) unless impracticable. Total THMs is a primary MCL and is a sum of four CTR constituents. The SIP governs establishment of effluent limitations for CTR priority pollutants, but Total THMs is not a CTR priority pollutant. However, for protection of human health, priority pollutants are regulated as a monthly average, and therefore, the Central Valley Water Board has determined that a similar averaging period is appropriate. ~~the total THMs effluent limitation was established in accordance with section 1.4 of the SIP, which requires CTR constituent limitations as an average monthly effluent limitation and a maximum daily effluent limitation.~~ Thus, this Order contains new WQBELs for total THMs as a monthly average effluent limitation of 80 µg/L ~~and a maximum daily effluent limitation of 162 µg/L.~~
- (d) **Plant Performance and Attainability.** Summation of the four constituents equals a combined MEC of 182.4 µg/L for total THMs, which is greater than the applicable WQBELs. Therefore, the Discharger appears to be in immediate non-compliance with the total THMs final effluent limitation. New or modified control measures may be necessary in order to comply with the effluent limitation, and the new or modified control measures cannot be designed, installed and put into operation within 30 calendar days. Therefore, a time schedule for compliance with the effluent limit is established in ~~amended CDO R5-2009-0012-02 in accordance with CWC section 13304~~ this Order. ~~The CDO~~ This Order also requires preparation and implementation of a pollution prevention plan in compliance with CWC section 13263.3. The Discharger began construction of major Facility upgrades in September 2009. The new Facility will use UV disinfection of the effluent which replaces the use of chlorine for disinfection. The Central Valley Water Board concludes that compliance with the effluent limit will be feasible as soon as the new Facility is operational.

3. **NPDES Permit, Fact Sheet (Attachment F), Section IV.C.4.e.** Delete Table F-16 shown below:

~~Table F-16. WQBEL Calculations For Total Trihalomethanes~~

	Human Health
Criteria (µg/L)	80
Dilution Credit	No-Dilution
ECA	80
<del>AMEL (µg/L)<sup>(1)</sup></del>	<del>80</del>
MDEL/AMEL Multiplier <sup>(2)</sup>	2.01
<del>MDEL (µg/L)</del>	<del>161</del>

<sup>(1)</sup>AMEL = ECA per section 1.4.B, Step 6 of SIP

<sup>(2)</sup> Assumes sampling frequency n <= 4. Uses MDEL/AMEL multiplier from Table 2 of SIP.

4. **NPDES Permit, Fact Sheet (Attachment F).** Modify Table F-19 Summary of Water Quality-Based Effluent Limitations as follows:

**Table F-19. Summary of Water Quality-Based Effluent Limitations**

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Total THM	µg/L	80	--	162--	--	--

5. **NPDES Permit, Fact Sheet (Attachment F).** Modify Table F-20 Summary of Final Effluent Limitations as follows:

**Table F-20. Summary of Final Effluent Limitations**

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Total THM	µg/L	80	--	162--	--	--