

**Aide Ortiz - Comments/questions on Planada WWTP permit**

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**From:** <Sablad.Elizabeth@epamail.epa.gov>  
**To:** Aide Ortiz <AOrtiz@waterboards.ca.gov>  
**Date:** 5/5/2011 12:41 PM  
**Subject:** Comments/questions on Planada WWTP permit  
**CC:** Matt Scroggins <msscroggins@waterboards.ca.gov>

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Hi Aide,

Overall, the Planada WWTP permit looks well-written; however I have a few comments/questions:

1. The WQBELs for ammonia are not the same throughout the permit/fact sheet. The fact sheet RP discussion (F-21) and the WQBEL calculation table (H-1) include one set of values; whereas the summary table of final effluent limits (F-38) and those in the permit (p.10) include another set of values. Please correct this error.
2. The justification for not including effluent limits for copper and lead, starting on page F-18, include a statement that "the laboratory reports show there are no QA/QC issues with the analytical results." This statement is contrary to the justification that the data is insufficient to perform a proper RPA. Data should not be rejected if there are no QA/QC flags.
3. The tertiary requirements for BOD and TSS are included in the TBEL discussion on page F-12; however, it was my understanding that the tertiary requirements are water quality-based requirements, based on the MUN beneficial use. The Regional Board needs to decide how the tertiary requirements will be discussed in fact sheets and make sure each permit is consistent with that decision.
4. Page F-8 states there are TMDLs for chlorpyrifos and diazinon. Do these TMDLs include WLAs for this facility? Please clarify.

Feel free to call me if you have any questions.

Sincerely,  
Elizabeth

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