

Central Valley Regional Water Quality Control Board
4/5 December 2014 Board Meeting

Response to Comments
for the
University of California, Davis
Main Wastewater Treatment Plant
Tentative NPDES Permit Renewal

The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements for NPDES Permit No. CA0077895 (NPDES Permit) renewal for the University of California, Davis (Discharger), Main Wastewater Treatment Plant (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 25 September 2014 and comments were due 27 October 2014. The Central Valley Water Board received public comments regarding the tentative document by the due date from the following:

- Central Valley Clean Water Association (CVCWA)

Changes were made to the tentative NPDES Permit based on public comments received. The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

CVCWA COMMENTS

CVCWA Comment I. Salinity Plan Requirement

CVCWA states that the proposed Order should not require the Discharger to prepare a salinity evaluation and minimization plan to identify and address sources of salinity from the Facility. CVCWA cites several studies and projects the Discharger has pursued that demonstrate the Discharger's efforts to examine salinity and implement source control. CVCWA requests that the salinity plan requirement be removed from the tentative NPDES Permit, or at a minimum, the tentative NPDES Permit should require an update to existing plans rather than require a new plan.

RESPONSE: We agree that the proposed Order should not require the Discharger to prepare a new salinity evaluation and minimization plan because the Discharger has conducted studies to identify source control measures and proposed projects to reduce salinity. The proposed Order was modified, as shown in underline/strikethrough format below (and as appropriate throughout to maintain consistency), to require the Discharger to submit an updated summary of the efforts to reduce salinity and to require annual updates of the efforts to reduce the salinity levels in the Facility effluent discharge.

Section VI.C.3 Best Management Practices and Pollution Prevention

- a. **Salinity Evaluation and Minimization Plan.** The Discharger shall ~~prepare a salinity evaluation and minimization plan to identify and address sources of salinity from the Facility, submit an updated summary of the efforts to reduce salinity in the Facility's discharge.~~ The plan update shall be completed and submitted to the Central Valley Water Board <within 9 months of the adoption date of this Order>. The Discharger shall provide an annual reports demonstrating reasonable progress in the reduction of update discussing the efforts to reduce salinity in its discharge to the South Fork of Putah Creek and the Arboretum Waterway. The annual reports update shall be submitted in accordance with the MRP (Attachment E, section IX.D.1).

CVCWA Comment II. Effluent Limitation for Boron

CVCWA requests that the effluent limitation for boron be removed because there is no reasonable potential and no basis for imposing water quality based effluent limitations.

RESPONSE: We concur, and the proposed Order does not contain a final boron effluent limitation. The receiving water, Putah Creek, is 303 (d) listed as an impaired water body for boron and the discharge must not cause or contribute to increased boron levels within the receiving water. A study to determine, in part, boron levels protective of agricultural beneficial uses within the area indicated that 1.5 mg/L is protective (Grattan, S.R., and Isidoro-Ramirez, D, May 2006, *An Approach to Develop Site-Specific Criteria for Electrical Conductivity, Boron, and Fluoride to Protect Agricultural Beneficial Uses*). The maximum annual average effluent concentration of 0.78 mg/L is below the recommended site-specific objective of 1.5 mg/L, and therefore, the discharge does not exhibit reasonable potential to cause Putah Creek to exceed boron levels. Thus, a boron effluent limitation is not necessary to protect the agricultural beneficial use.