



March 7, 2016

**Main Office**

10060 Goethe Road  
Sacramento, CA 95827-3553  
Tel: 916.876.6000  
Fax: 916.876.6160

James D. Marshall  
Senior Engineer  
Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

**Treatment Plant**

8521 Laguna Station Road  
Elk Grove, CA 95758-9550  
Tel: 916.875.9000  
Fax: 916.875.9068

[RB5S-NPDES-Comments@waterboards.ca.gov](mailto:RB5S-NPDES-Comments@waterboards.ca.gov)

Re: Tentative WDRs for Sacramento Regional Wastewater Treatment Plant; NPDES permit renewal

**Board of Directors**

Representing:  
County of Sacramento  
County of Yolo  
City of Citrus Heights  
City of Elk Grove  
City of Folsom  
City of Rancho Cordova  
City of Sacramento  
City of West Sacramento

Dear Mr. Marshall:

Sacramento Regional County Sanitation District (Regional San) appreciates the opportunity to provide comments and further evidence related to the tentative waste discharge requirements for renewal of the NPDES permit for the Sacramento Regional Wastewater Treatment Plant (SRWTP). This letter provides comments on certain issues for the Regional Water Quality Control Board's (Regional Water Board) consideration. In addition, we enclose a spreadsheet with detailed comments (accompanied by explanation where necessary). While we have concerns with some aspects of the tentative permit, Regional San appreciates Regional Water Board staff's work and the consideration of our comments.

Prabhakar Somavarapu

*District Engineer*

Ruben Robles

*Director of Operations*

Christoph Dobson

*Director of Policy & Planning*

Karen Stoyanowski

*Director of Internal Services*

Joseph Maestretti

*Chief Financial Officer*

Claudia Goss

*Public Affairs Manager*

**Thermal Issues**

As you know, there have been evaluations of thermal effects of the SRWTP discharge for decades. Most recently, this work involved the comprehensive evaluations conducted in close collaboration with fishery agencies, and the 2013 Temperature Study to Assess the Thermal Impacts of the Sacramento Regional Wastewater Treatment Plant Discharge on Aquatic Life of the Lower Sacramento River; the 2015 Delta Smelt Addendum; and the 2015 Synthesis, Supplemental Analysis, and Findings Report. The thermal requirements proposed, including alternative limitations based on exceptions during part of the year, are supported by the evidence and meet the requirements of state and federal law. Arguments to the contrary are not based on a technical foundation or applicable law.

It is Regional San's understanding that, as proposed, the effluent and receiving water limits for the SRWTP would, upon adoption of the permit, be based on the Thermal Plan without exceptions, and that if the State Water Resources Control Board (State Water Board) concurs with the exceptions, the exceptions

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and alternative limitations would come into effect without further action by the Regional Water Board. Under all the circumstances, including that we expect the SRWTP to comply with Thermal Plan-based limitations over the next few months after permit adoption, this is an acceptable approach. We note, however, that it is important that the concurrence decision occur promptly, and hope to work with Regional Water Board staff to advance that action.<sup>1</sup>

We also offer the following comments and recommendations with respect to the tentative order, which follow the sequence of the tentative order itself.

- **Page F-13, section III.A.i; also Attachment I, page I-2:** In these locations, the findings refer to the Code of Federal Regulations with respect to exceptions and alternative effluent limitations, and there is a finding that the “alternative limitations” will assure the protection of aquatic life (per the language of the regulations). It is thus implicit that limitations based only on the Thermal Plan are “more stringent than necessary . . .” However, we suggest that the Regional Water Board should make two findings: one to the effect that limitations based on the Thermal Plan are more stringent than necessary; and one to the effect that the alternative limitations are sufficient (each finding, of course, would track the language of the regulations).
- **Attachment I, page I-2:** Regional San recommends that the first paragraph under “Consideration of Thermal Plan Exceptions” clarify that the findings and conclusions relating to Code of Federal Regulations, title 40, section 125.73(a) are based on consideration of the entire thermal effect of the discharge, and that to the extent information is presented on the incremental difference between Thermal Plan-based limitations and exception-based limitations, this is for information and context only.

In the same vein, the first bullet on page I-2 appears to relate to the difference between Thermal Plan-based limitations and the alternative limitations. We recommend that this bullet be moved to after the current fourth bullet (which discusses cumulative effects), and that clarifications be added as necessary to explain that the current first bullet’s statements pertain to the incremental difference (which again, would be for context and information only). Also, the second paragraph under the current first bullet refers to a 100-foot area of thermal impacts. Overall, we believe that this paragraph may be misread, and we have not confirmed the technical conclusions that are stated. This statement is not necessary to the ultimate findings, and thus we recommend it be removed, here and from text on page I-8.

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<sup>1</sup> If exceptions and alternative limitations were not approved, the Regional Water Board could appropriately, under Water Code section 13263, include a compliance schedule in the permit, based on the conclusion that the provisions of section 310(b)(1)(C) of the Clean Water Act should not preclude such schedules, because the Thermal Plan objectives in issue do not meet the definition of water quality “standards” under the Clean Water Act. However, this issue should be academic because the exceptions and alternative limitations are appropriate.

- **Attachment I, page I-3:** Regional San believes that the finding related to carbon footprint is important information. However, we recommend that this information be relocated in the document since it is not, in this instance, necessary to the findings on exceptions and the sufficiency of alternative limitations. This description of carbon footprint and related issues could be moved to the very end of the first paragraph of the Introduction section; i.e., immediately preceding Table I-1.
- **Attachment I, page I-4, second-to-last paragraph:** Note that the final sentence states that “The Court agreed . . .,” but the text has not, prior to this point, identified the court or the litigation in which thermal exceptions have been considered.
- **Attachment I, page I-7:** The bullet beginning at the bottom of page I-7 appears to relate to the difference between Thermal Plan-based limitations and the exceptions. We recommend that it be moved, to after the bullet that discusses cumulative effects, and that clarifications be added as necessary to explain that the current first bullet’s statements pertain to the incremental difference (and again, are for context and information only). Also, the second paragraph under the current first bullet refers to a 100-foot area of thermal impacts. Overall, we believe that this paragraph may be misread, and we have not confirmed the technical conclusions. This statement is not necessary to the ultimate findings, and thus we recommend it be removed.
- **Attachment I, pages I-10 to I-13:** The 2010 model results presented on these pages, and conclusions based on those results, are based on an assumed 218 mgd of discharge, which is substantially greater than the volume being permitted. (As of the time of the 2010 study, Regional San was seeking increased permitted capacity, but subsequently concluded that such an increase is not necessary.) Accordingly, the text could appropriately be modified to reflect that the model results overstate the thermal effects of the permitted discharge, but even with this conservative approach, zones of passage exist.<sup>2</sup>
- **Attachment I, pages I-13 to I-14:** The paragraph starting on the bottom of page I-13 and beginning with “Under fully mixed conditions . . .” contains somewhat detailed statements regarding the incremental analysis. Regional San does not necessarily believe this is needed, or at minimum it should be clarified that the conclusions related to the Code of Federal Regulations standard for exceptions and alternative limitations pertain to the entire thermal load from the SRWTP.
- **Attachment I, pages I-15 to I-16:** Regional San believes that the finding related to carbon footprint is important information. However, we recommend that this information be relocated in the document since it is not, in this instance, necessary to the ultimate findings on the exceptions. This description of carbon footprint and costs could be moved, to become an informational item “5” at the very end of the attachment.
- **Attachment I, pages I-21 to I-22:** The chronological order of sections iii and v could be slightly modified. As written, the tentative order states “In July 2015 the Central Valley Water

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<sup>2</sup> Regional San also notes that the attachments or appendices to the 2013 Study and the Delta Smelt Addendum include results for discharge at lower flows, including 181 mgd.

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Board adopted the above findings and Thermal Plan exceptions based on the current evidence in the record . . .” The tense and use of “current” is somewhat awkward and implies that nothing is different in the record supporting the tentative order from the record that existed and supported the July 2015 order. The summary of the letters from the fisheries agencies could also be moved to after section v, which summarizes the synthesis report. Some reorganization can result in an improved chronology to illustrate that there are items that have become available after October 2015 and are being included in the record.

### **Denial of Mixing Zones for Copper and Cyanide**

A chronic mixing zone has been approved in the tentative order. Regional San believes that it would be appropriate for the Regional Water Board to grant an acute mixing zone also; a limited 60-foot zone would be sufficient and meet all requirements of the State Implementation Policy and any other applicable policy or regulation.

Although we remained concerned with the risk of non-compliance, Regional San understands that Regional Water Board staff has concluded that Regional San will be able to comply with the effluent limitations without allowance of an acute mixing zone. Subject to our later comments regarding past and potential future changes in wastewater characteristics (see below), Regional San agrees to move forward with the limitations as proposed. However, respectfully, we strongly recommend that the basis for denial be the Regional Water Board’s anticipation of compliance based on performance rather than the existence of unknown toxicity in the Delta and the pelagic organism decline. (Tentative Order, p. F-31.) The latter stated reasons, we believe, are not a logic that supports denial of all acute mixing zones, and further Regional San is concerned with any potential implications of those statements for future permitting actions.<sup>3</sup>

### **POTENTIAL CHANGES IN WASTEWATER CHARACTERISTICS**

As Regional Water Board staff is aware, Regional San has experienced significant changes in wastewater influent (and effluent) characteristics due to water conservation and drought. In general, reduced total household water use results in increased concentrations of certain pollutants, without change in total load. These changes are beyond Regional San’s control. However, because effluent concentration is regulated in the NPDES permit, Regional San may be at risk of permit violations as wastewater flow conditions continue to change, and particularly if there are still further increases in conservation. Regional San thus requests acknowledgement of the potential future need to adjust final or interim limits as may be justified by future circumstances. In addition, Regional San may wish to pursue adjustments in criteria based on translators or a water effects ratio, or other actions that can

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<sup>3</sup> We also request that the following language be deleted from section F.IV.C.2.c.iv:

*U.S. EPA Region VIII, in its “EPA Region VIII Mixing Zones and Dilution Policy”, recommends no dilution for acute aquatic life criteria, stating the following, “In incomplete mix situations, discharge limitations to implement acute chemical-specific aquatic life criteria and narrative (no acute toxicity) criteria shall be based on achieving such acute criteria at the end-of-pipe (i.e., without an allowance for dilution). This approach is intended to implement the narrative requirement prohibiting acutely toxic conditions in the mixing zone.”*

While this may be the practice in Region VIII, it is not the universal practice in Region IX or in the Central Valley Region where acute mixing zones have been approved.

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ensure both protection of beneficial uses and compliance with applicable effluent limitations. Regional San will work with Regional Water Board staff cooperatively on any such future activities.

### **MONITORING AND REPORTING ISSUES**

As stated in the introduction of this letter, the enclosed table includes comments and requested changes that require limited or no explanation. Generally, however, we note that several comments and requested changes relate to proposed monitoring or reporting information where the burden seems excessive or disproportionate to the need. Regional San does, of course, conduct a tremendous amount of monitoring, both under the specific requirements of its permit and under programs, and will continue to do so under this permit. Our recommended modifications reflect our good-faith belief that some proposed requirements go beyond what is reasonably necessary, and we request these comments be considered favorably.

Thank you for considering Regional San's comments and information.

Respectfully,



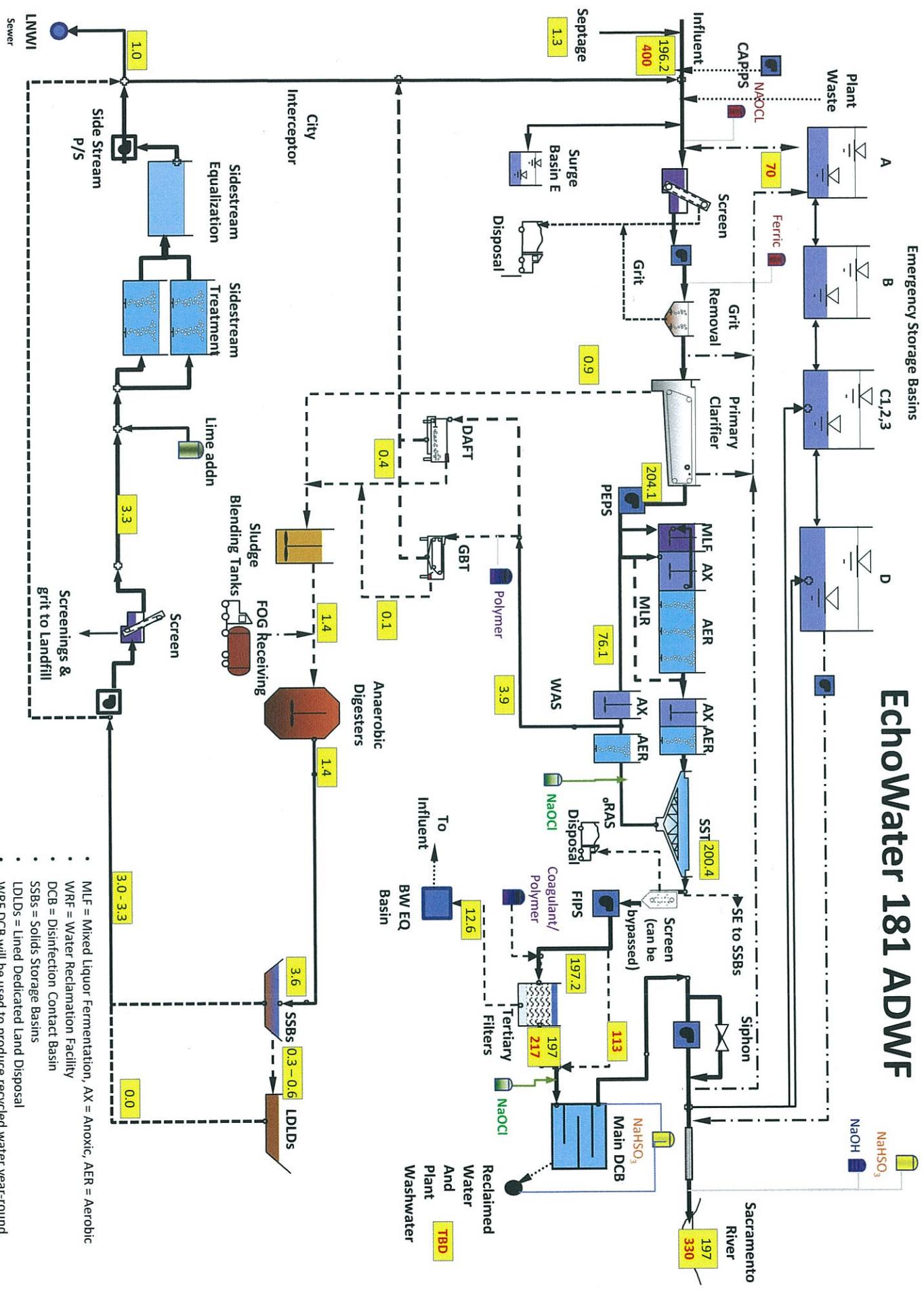
Christoph Dobson

Director of Policy & Planning

cc: Prabhakar Somavarapu  
Ruben Robles  
Dave Ocenosak  
Robert Seyfried  
Vyomini Upadhyay  
Vicki Fry  
Tom Grovhoug, LWA  
Betsy Elzufon, LWA  
Paul Simmons, SSD  
Theresa Dunham, SSD  
Brittany Lewis-Roberts, SSD

Attachments: EchoWater 181 ADWF  
Comments Table

# EchoWater 181 ADWF



- MLE = Mixed Liquor Fermentation, AX = Anoxic, AER = Aerobic
- WRF = Water Reclamation Facility
- DCB = Disinfection Contact Basin
- SSBS = Solids Storage Basins
- LDLDs = Lined Dedicated Land Disposal
- WRF DCB will be used to produce recycled water year-round.
- Biosolids Recycling facility (BRF) is not in service

# COMMENTS ON SRWTP TENTATIVE PERMIT

NO.	PERMIT SECTION	PAGE NO.	REVIEW COMMENTS
<b>Edits</b>			
1	VI.C.2.e	18	Temperature Receiving Water Limitations Compliance Methodology Second to last line in this paragraph, delete the word "be." "....shall <b>be</b> become..."
2	Att. D	D-2	Spelling error : "The Discharger submitted notice to the Central Valley Water Board as required
3	Att. E	E-23	Spelling error: In the <del>event</del> <b>event</b> that the Discharger
4	Att. F, II.A.2	F-6	Duplicate sentence needs to be removed  The Central Valley Water Board will work with the Discharger to identify the appropriate steps and actions to be taken to minimize the potential for Mandatory Minimum Penalties. <del>The Central Valley Water Board will work with the Discharger to identify the appropriate steps and actions to be taken to minimize the potential for Mandatory Minimum Penalties.</del>
5	Att. F, II.A.3 Att. F, II.A.4	F-7	Order R5-2015-0133 was adopted on 12/11/15. Make global change to correct Order number.
6	Att. F	F-48	Spelling error (e.g. death, immobilization, or serious <del>incapitation</del> <b>incapacitation</b> )
7	Att. F	F-67	The upstream receiving water concentration of 0.005 µg/L for <del>benzo(k)fluoranthene</del> <b>benzo(k)fluoranthene</b> does exceed the CTR chronic criterion.
8	Att. F	F-78	Spelling error: <del>petenat</del> <b>potential</b> to exceed or threaten
9	Att. I	I-5	Bottom box in the flowchart – "consideration" is misspelled
<b>Requested Changes and Clarifications</b>			
10	II.C	3	This section of the tentative permit refers to provisions and requirements that implement only state law. The references should also include: the last two sentences of section III.A. (pertaining to recycled water use); and section VI.C.5.b. (WDRs pertaining to collection systems), particularly since the second sentence of the section states that the Discharger shall be subject to the WDRs.

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11	IV.A.2.b	8	<p>Table 6. Interim Effluent Limitations – Ammonia Mass loads are incorrect. Change to mass loads in current permit. Remove footnote 1 from mass units.</p>
12	VI.C.7.c	22	<p>December data is not available until January and document preparation and review requires a month.</p>
13	IV.A.1.a, Table 4; IV.A.1.g; VI.C.2.d; Att. 3, IV.A.1, Table E-4	5; 6; 18; E-6, n.2	<p>Methylmercury Annual Progress Reports due date <del>30 January, annually</del> <b>1 March, annually</b></p> <p>The references to the constituents to be monitored at the new location TER-001 are not consistent. Page 5, footnote 3 refers to compliance with final effluent limitations for BOD<sub>5</sub> and TSS, page 6, section IV.A.1.g does not include a footnote for total coliform at location TER-001; page E-7, footnote 2 only lists total coliform. Changes should be made for consistency.</p>
14	Figure C-2	C-2	<p>This figure is not the map showing Echowater improvements that Regional San has most recently provided. We are submitting the correct map again with these Tentative permit comments.</p>
15	Att. E, I,B	E-2	<p>See attachment figure c2 tentative permit comment 20160218.xlsx</p> <p>“Final” should be inserted before “effluent samples,” or another change should be made to this paragraph, to reflect that turbidity monitoring of tertiary effluent will be measured after filtration but before disinfection.</p>
14	Att. E, Table E-4	E-6	<p>Historically mercury has been reported as total. Change Mercury, Total Recoverable to Mercury, Total.</p>
15	Att. E, IV. B	E-7	<p>Please clarify that Regional San will be able to stop monitoring for these parameters at EFF-01 once this location, TER-001, is approved.</p>
16	Att. E IV.A.1 Table E-4, footnote 13	E-7	<p>There is no monitoring required for chloryrifos and diazinon. Delete footnote 13 regarding the method for analysis and renumber footnotes 14-17 here and their references in Table E-4.</p> <p><del>“13 Chloryrifos and diazinon shall be sampled using U.S. EPA Method 625M, Method 8141, or equivalent GC/MS method.”</del></p> <p><sup>14-13</sup> <i>Cryptosporidium</i> shall be analyzed using U.S. EPA Method 1622/23.</p> <p><sup>15-14</sup> <i>Giardia</i> shall be analyzed using U.S. EPA Method 1623.</p> <p><sup>16-15</sup> Hardness samples shall be collected concurrently with metals samples.</p>

**COMMENTS ON SRWTP TENTATIVE PERMIT**

			<sup>4716</sup> Samples for total coliform organisms shall be collected after chlorination and prior to dechlorination. The sample must be dechlorinated immediately after sample collection.”
17	Att. E, IV.A.1 Table E-4, footnote 8 and Att. E, IX.B.2 Table E-10 Footnote 3	E-7	Remove footnote 8 on Table E-4 and footnote 3 on Table E-10. The sample type was changed from composite to grab sample for the EMP and ECS in the current permit to reduce contamination. Quality assurance procedures, including equipment and method blanks, are conducted for all semi-volatile analyses. <del>“In order to verify if bis(2-ethylhexyl)phthalate is truly present in the effluent discharge, the discharger shall take steps to assure that sample containers, sampling apparatus, and analytical equipment are not sources of the detected contaminant.”</del>
18	Att. E, IV	E-7 to E-8	Monitoring Location FIL-1 should be added to reflect the location for filter effluent monitoring, consistent with the current permit.
19	Att. E, IX.B	E-13	Since our treatment process will radically change in the next permit cycle, this permit cycle’s Effluent Characterization data is not valuable for future permit use. We have 2 years of data from the current permit, and theoretically would have 3 more years this cycle if kept the same. One year will demonstrate that the plant does not experience radical changes in this permit cycle.  Request that the effluent characterization study be reduced to one year, such as the third year, of the permit cycle. As other dischargers (Tracy, Stockton, Davis, Woodland, Redding) only have one year of effluent characterization. Year 3 will ensure that data gets into the ROWD.  Request every other month instead of monthly sampling.
20	Table E-10	E-14, E-15	“B Effluent and Receiving Water Characterization <del>1—Monthly Monitoring Every Other Year One Monitoring Event Every Other Month</del> Beginning 1 January <del>2017</del> 2019, the Discharger shall conduct <del>monthly</del> monitoring for one calendar year every other month and repeat the monitoring every other calendar year thereafter, beginning 1 January of that year.”
21	Table E-10	E-15	A compound is listed twice with different names: 3-methyl-4-chlorophenol (page E-14) and 4-chloro-3-methylphenol (page E-15). Delete one or the other. Page E-24 (Section X.D.5.a) says “The Discharger is not required to sample and analyze for asbestos.” Remove Asbestos from Table E-10.

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22	Table E-10	E-16	Remove Chromium (VI) from Table E-10. Total chromium has been less than 5 ug/L for the last 15 years. If total chromium follows historic trends, chromium (VI) will always be below the specified Maximum Reporting Level of 10 ug/L.
23	Table E-10	E-16	Change cyanide sample type to a grab sample. This will make characterization testing consistent with monthly monitoring (Table E-4). Historically, cyanide sampling has been a grab sample.
24	Att. E, IX.B, Table E-10	E-17	<p>Priority Pollutants, which make up a large portion of the list, are sampled quarterly each year under Pretreatment requirements. Priority Pollutant Data points will be submitted electronically now as part of the pretreatment program to CIWQS (new requirement this cycle. (P. E-24(b)). Delete all priority pollutants from Table E-10. If all priority pollutants cannot be removed, consider removing 2,3,7,8-TCDD because it has not been detected in the influent or effluent in 15 monitoring events, and is already included with the other priority pollutants sampled under pretreatment requirements.</p> <p>Table E-10. Strikeout all priority pollutants</p> <p>Or</p> <p>Remove 2,3,7,8-TCDD</p> <p>Or</p> <p>Change 2,3,7, 8-TCDD (Dioxin) sample type to a grab sample. Historically dioxins have been a grab sample.</p>
25	Att. E, IX.B, Table E-10	E-17	<p>Request pyrethroid analysis be removed from the Effluent Characterization list. The pyrethroid test method is not an approved or certified method and does not provide accurate data at a reporting level of acceptable confidence.</p> <p>Strikeout [all Pyrethroids] <del>Bifenthrin</del> <del>Cyfluthrin</del> <del>Cypermethrin</del> <del>Esfenvalerate</del> <del>Lambda-cyhalothrin</del> <del>Permethrin</del></p>

## COMMENTS ON SRWTP TENTATIVE PERMIT

26	Att. E, IX.B, Table E-10	E-17	Remove obsolete pesticides. All were removed from Order R5-2011-0083, because they were no longer available, used under restricted conditions, or historically not detected in the effluent or receiving water.
27	Table E-10		Strikeout <b>Dalapon, Dinoseb, Methoxychlor, Molinate, Picloram, 2,4,5-TP (Silvex), Alachlor, Bentazon, Oxamyl, 2,4-D, and Endothal</b>
28	Table E-10		Remove Diquat, Atrazine, Simazine, Thiobencarb, NEMA, NDEA, Tributyltin from Table E-10. These compounds were not detected in effluent sampled 24 times in 2013, and 2015.
29	Table E-10		Remove Ethylene Dibromide from Table E-10. This compound was not detected 120 times since 2003. Remove Dibromochloropropane, Carbofuran from Table E-10. These compounds were not detected in effluent sampled 24 times in 2013, and 2015. These compounds have no active registration in California.
30	Table E-10		Remove Organochlorine Pesticides 4,4'-DDD through Toxaphene from Table E-10. These compounds were not detected in effluent sampled 200 times from 2000 to 2015. These compounds were removed from most recent WDR permit.
31	Table E-10	E-17	Separate entries for Nitrate (as N) and Nitrite (as N) should be removed and a single entry for Nitrate Plus Nitrite (as N) should be added. This will make characterization testing consistent with weekly monitoring (Table E-4).
32	Table E-10	E-17	Temperature and pH sample type should be meter to be consistent with Table E-4.
33	Table E-11	E-19	December data is not available until January and document review requires one month. Change all SMR due date of 1 February to 1 March.
34	Att. E, X.B.7.f	E-21	CVRWQCB enforcement staff previously agreed that compliance determination is best made based on an instantaneous river grab temperature sample and the effluent temperature taken at the same time the river grab sample is collected.
35	Att. E, X.D.1, Table E-12	E-22	<b>Temperature Effluent Limitation.</b> For every day receiving water temperature samples are collected at Monitoring Location RSWU-001, the Discharger shall calculate and report the difference between the effluent and upstream receiving water based on the difference in the <del>daily-average</del> <b>effluent</b> temperature at Monitoring Location EFF-001 <b>(at the same time the RSWU-001 grab samples are collected)</b> and temperature of grab samples collected at Monitoring Location RSWU-001.
36	Att. E, X.D.1, Table E-12	E-22	Change Compliance Schedules for final effluent limitation for ammonia, progress reports due date to July 9. Request due date change for Annual Progress Report for Methylmercury from 30 January to 1 March. December data is not available until January and document review requires one month.

**COMMENTS ON SRWTP TENTATIVE PERMIT**

			<p>“Compliance Schedules for Final Effluent Limitations for Methylmercury, Progress Reports (Special Provision VI.C.7.c)</p> <p><del>30-January</del> 1 March, annually, until final compliance”</p>
37	Att. E, X.D.5.f	E-24	<p>Request change from quarterly pretreatment reports to submittal of July semi-annual pretreatment report. This request was approved in the last permit cycle. Submitting a quarterly report is a large admin burden with little to no changes anticipated to be reported for a limited number of significant industrial users.</p> <p>“ A semi-annual report, covering the period of 1 January through 30 June, describing the compliance status of each SIU characterized by the descriptions in items iii through vii above shall be submitted by 31 July. <del>for each calendar quarter by the first day of the second month following the end of the quarter.</del> The report shall identify the specific compliance status of each such SIU and shall also identify the compliance status of the POTW with regards to audit/pretreatment compliance inspection requirements. If none of the aforementioned conditions exist, at a minimum, a letter indicating that all industries are in compliance and no violations or changes to the pretreatment program have occurred during the covered period must be submitted. <del>The information required in the fourth quarter report shall be included as part of the annual report due every 25 March. This quarterly reporting requirement shall commence upon issuance of this Order.”</del></p>
38	Att. F, II.A.2	F-4	<p>There are many non-potable uses beyond irrigation that are clearly and specifically outlined in Regional San regulatory documents and recycled water user documents.</p>
39	Att. F, II.A.2.b	F-6	<p>“The WRF is regulated under Master Reclamation Permit No. 97-146 and provides recycled water for <del>landseape-irrigation</del> specific non-potable uses and wastewater treatment plant process water.”</p>
40	Att. F, II.A.4	F-7	<p>Recommend relocating the paragraph that begins with “In all...” to the end of section F.II.E (Planned Changes).</p>
41	Table F-2	F-9	<p>Suggest the following text change for clarification: The Discharger conveys the extracted groundwater from the CAP extraction wells, <u>at an average pumping rate of estimated at approximately 1.0 0.4 MGD</u>, to the Facility effluent channel downstream of the secondary clarifiers and upstream of the plant chlorination station or onsite constructed wetlands.</p>
42	Att. F, III.E.1.a	F-17	<p>In “Maximum Daily” column of table, permit shows “20<sup>8</sup>”. This should either be just the footnote in this cell of table (like Tables F-16 and F-17, p. F-87 and F-97, respectively), or it should be “20/25<sup>8</sup>”</p> <p>We were not able to find this reference in the Echo Water EIR or in any previous EIR.</p> <p>Delete this sentence:</p>

# COMMENTS ON SRWTP TENTATIVE PERMIT

			<p>：“The Environmental Impact Report (EIR) states that settled sludge has created a barrier to groundwater similar to being lined”.</p>
43	Att. F, III.E.1.a, b, c	F-17	<p>Add text for clarification in a.: The SSB’s are governed by Order R5-2015-0133, which classifies the SSB’s as unclassified and exempt them from Title 27 pursuant to CCR Title 27 section 20090(a). Also, the other references on this page to Order R5-2003-0076 should also be replaced with R5-2015-0133.</p>
44	Att. F, B.2(c)	F-21	<p>Last sentence under pH; correction to text needed as follows: This Order, however, requires a more stringent instantaneous <del>minimum</del> maximum effluent limitation for pH, as discussed further in section IV.C.3 of this Fact Sheet.</p>
45	Att. F, IV.C.2.iv(e) Att. F, IV.C.2.v(e)	F-30 F-32	<p>There is a sentence in each of these locations that refers to “a concern” regarding ammonia and nuisance aquatic life, which in turn refers to subsection vii. Subsection vii itself does not discuss such a concern; nor is there a reason to address this issue or revive prior discussions of this issue. Regional San did not request a mixing zone for the calculated ammonia effluent limits.</p>
46	Att. F, IV.C.3.c.i(b)	F-69	<p>Delete the following sentence from both locations: “There is concern that the high ammonia concentrations in the discharge create undesirable or nuisance aquatic life (see subsection vii for ammonia, below); therefore, an acute mixing zone for ammonia is not allowed.”</p>
47	Att. F, IV.C.3	F-71	<p>With respect to the RPA results for ammonia, revise the second sentence to read as follows: “Untreated domestic wastewater contains ammonia in concentrations that is harmful to aquatic life and exceeds the Basin Plan narrative toxicity objective.”</p> <p>The second sentence in RPA results for carbon tetrachloride appears to be referring to receiving water, not effluent.</p> <p>(b) RPA results:</p>
48	Att. F, IV.C.3	F-73	<p>The MEC for carbon tetrachloride was ... Carbon tetrachloride was not detected in the <del>effluent</del> upstream receiving water based on 12 samples collected between January 2012 and December 2014.</p> <p>The second sentence in RPA results for chlorodibromomethane appears to be referring to receiving water, not effluent.</p> <p>(b) RPA results:</p> <p>The MEC for chlorodibromomethane ... Chlorodibromomethane was not detected in the <del>effluent</del> upstream receiving water based on 12 samples collected between January 2012 and December 2014.</p>

COMMENTS ON SRWTP TENTATIVE PERMIT

49	Att. F, IV.C.3	F-75	The second sentence in RPA results for dichlorobromomethane appears to be referring to receiving water, not effluent.  (b) RPA results:
50	Att. F, Mercury ix(a)	F-76	The MEC for Dichlorobromomethane was.... Dichlorobromomethane was not detected in the <b>effluent upstream receiving water</b> based on 12 samples collected between January 2012 and December 2014. "The Facility is allocated 89 grams/year of methylmercury by 31 December 2030, as listed in Table IV-7B of the Basin Plan."
51	Att. F Mercury ix.(d)	F-76	Add clarification.  the "... Board finds the Discharger is unable to immediately comply with the final WQBEL's for methylmercury. Therefore, a compliance schedule in accordance with the State Water Board's Compliance Schedule Policy and the Delta Mercury Control Program has been established in this Order in <b>Section VI.C.7.c. page 22.</b> "
52	Att. F, IV.C.3.xi(b)	F-77	With respect to the RPA results for nitrate and nitrite, revise the second sentence to read as follows: "Untreated domestic wastewater contains ammonia in concentrations that is harmful to aquatic life and exceeds the Basin Plan narrative toxicity objective."
53	Att. F, IV.C.3.xiv(b)	F-84	This is not accurate and is copied and pasted from the prior permit. The MEC for settleable solids listed in table F-2 on page F-8 states that the highest average monthly discharge for settleable solids was <0.1 mL/L and the highest daily discharge was 0.1 mL/L. There is no reasonable potential, and the effluent limits for settleable solids should be removed.
54	Att. F, VIII.A	F-119	Last sentence of paragraph 1 in A is missing the ending. "Notification was provided through the following..." [ <b>Regional Board will finish sentence</b> ]
55	Att. I	I-14	Add text for clarification: At the 50 <sup>th</sup> percentile there was no change in downstream temperature whether complying with the 20°FΔT objective or with the 25°F ΔT exception. At the 99.91% the maximum differential was only 0.09°F ( <b>December</b> ).
56	Att. I	I-14	The word " <b>Instantaneous</b> " seems to be missing from the 20°F T column. Add the word <b>Instantaneous</b> to the 20°F T column.