

CAMARILLO SANITARY DISTRICT

P O Box 248, Camarillo, CA 93011-0248

*Department of Public Works
Sanitation District Office
(805) 383-5665*

October 17, 2019

Regional Water Quality Control Board – Los Angeles Region
320 West 4th Street, Suite 200
Los Angeles, CA 90013

Attn: Jeong-Hee Lim, PhD P.E., Chief
Municipal Permitting Unit (NPDES)

SUBJECT: COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS (WDRs) AND NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT FOR CAMARILLO SANITARY DISTRICT, CAMARILLO WATER RECLAMATION PLANT (NPDES NO. CA0053597, CI NO. 1278)

The Camarillo Sanitary District (District) has reviewed the above referenced document and supporting materials, and appreciates the opportunity to comment. Our comments are provided in the following order:

1. Wet weather effluent limits for salts
2. Effluent limits for MBAS
3. Effluent limits for boron
4. Effluent limits for chlorinated pesticides and PCBs
5. Effluent limits for selenium
6. Effluent limit for TTHM
7. Effluent limits for iron
8. Compliance with effluent limit for bis(2-ethylhexyl) phthalate
9. Temperature limit for effluent and characterization of surface water limitation for temperature
10. Toxicity effluent limits and provisions
11. Recycled water studies
12. Climate change plan
13. Wetlands requirements

14. Monitoring program modifications and corrections

15. Additional corrections and modifications

Plus, Attachment 1: Corrections to Tables in the Fact Sheet.

1. Wet weather limits for salts

The wet weather effluent limitations for TDS, sulfate and chloride in Table 4 should be deleted because there is no reasonable potential for the effluent to cause or contribute to a water quality exceedance during wet weather. Section F.IV.C.2.b.vi. on pg. F-34 of the Tentative Order states that, during wet weather, the limits for TDS sulfate and boron are based on the water quality objectives found in Basin Plan Table 3-8. However, as noted in the dry weather definition found in Section VII.O. on page 33, “During wet weather, the loading capacity of the stream is significantly increased by storm water flows with very low salt concentrations. Any discharges from the Facility during wet weather would be assimilated by these large storm flows and would not cause exceedances of water quality objectives.” Therefore, no reasonable potential exists during wet weather for a water quality objective to be exceeded and no effluent limitation is required for wet weather. 40 C.F.R. §122.44(d)(1)(i) and (iii).

In addition, The CCW Salts TMDL specifically identified that only dry weather allocations were needed to address any identified impairments. Therefore, only dry weather effluent limitations are needed to implement the CCW Salts TMDL WLAs.

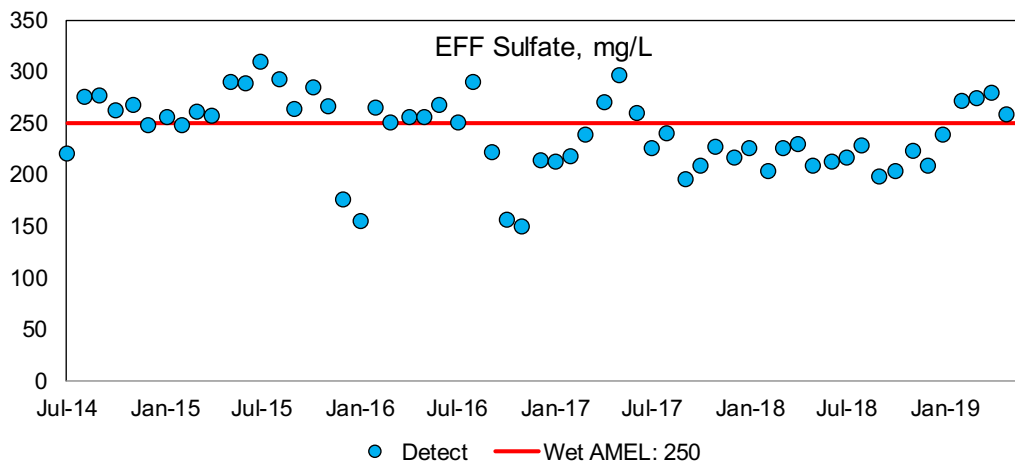
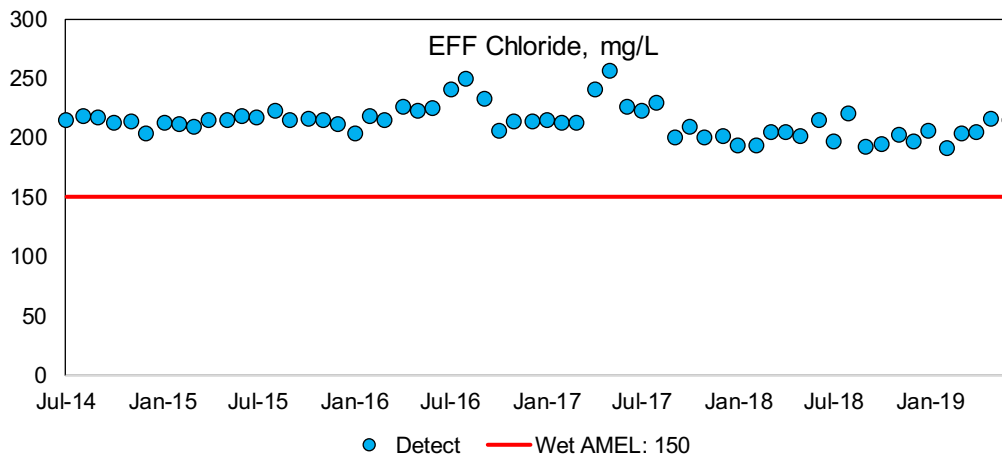
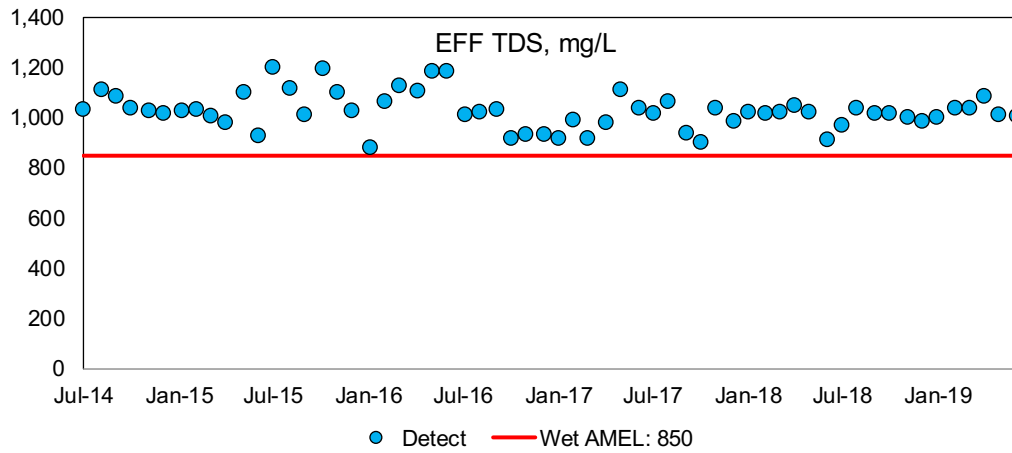
Inclusion of the wet weather limits in the Tentative Order will create a compliance issue for the District. As shown in the charts below, TDS, and chloride routinely exceed the concentrations used for wet weather effluent limits in the Tentative Order and sulfate has a probability of compliance of only 61.8% (considering all samples). Should effluent sampling coincide with the conditions defining wet weather conditions in the Salts TMDL (i.e., when mean daily discharge in Calleguas Creek at CSUCI >31 cfs), the District will likely not meet the wet weather limits for one or more salt constituents.

The District requests that the wet weather limits for TDS, chloride and sulfate be removed.

Comments on Tentative WDR from Camarillo Sanitary District

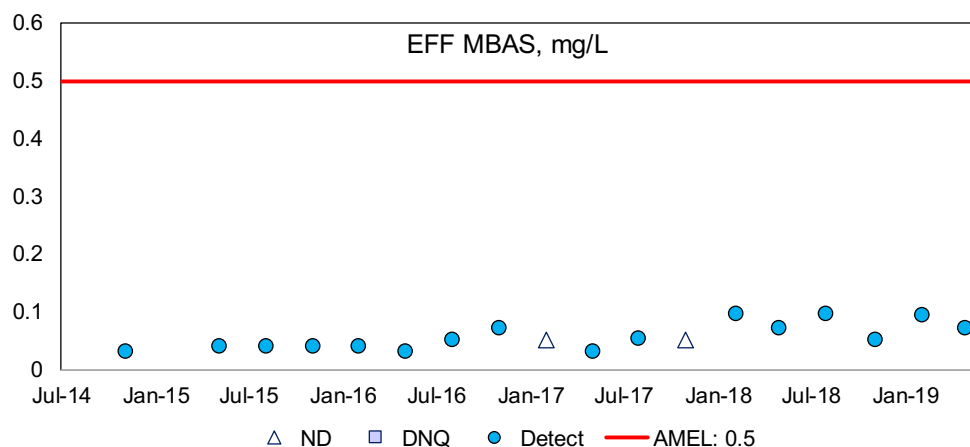
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2. Effluent limit for MBAS

An effluent limit for MBAS is included in Table 4 that is set equal to the drinking water Maximum Contaminant Level (MCL) of 0.5 mg/L. The Regional Board did not conduct Reasonable Potential Analysis (RPA) for MBAS in the Tentative Order, however Table F-2 in the Fact Sheet (p. F-7) indicates that the highest daily discharge concentration and highest AMEL for MBAS during 2014-2019 data review period were 0.1 mg/L and 0.05 mg/L, respectively (see chart of AMEL values below). There is no evidence that effluent will cause or contribute to exceedances of the MCL in receiving waters.



In addition, the MCL for MBAS is not applicable to the receiving water based on its beneficial uses. Section IV.C.2.b.ix. of the Fact Sheet (p. F-36), states that this effluent limitation “was developed based on the Basin Plan incorporation of Title 22 Drinking Water Standards.” MBAS is discussed in Chapter 3 of the Basin Plan in the section covering Regional Objectives for Inland Surface waters, which clearly states that this objective only applies to [surface] waters designated MUN. However MUN is not applicable to the surface receiving waters downstream of the Camarillo WRP, as is stated in Section III.C.1. (p. F-18) and in footnote 1 of Table F-4 (pg. F-19) of the Tentative Order Fact Sheet, as follows:

“As described above, the receiving water was designated as Potential MUN consistent with State Water Board Resolution No. 88-63 and Regional Water Board Resolution No. 89-003. However, when designating the receiving water as Potential MUN, the Regional Water Board only conditionally designated rather than finally designated the water body as Potential MUN as indicated by the “*”. The Basin Plan states that until the Board undertakes a detailed review of the criteria in State Water Board Resolution No. 88-63, no new effluent limitations will be placed in Waste Discharge Requirements as a result of these designations.”*

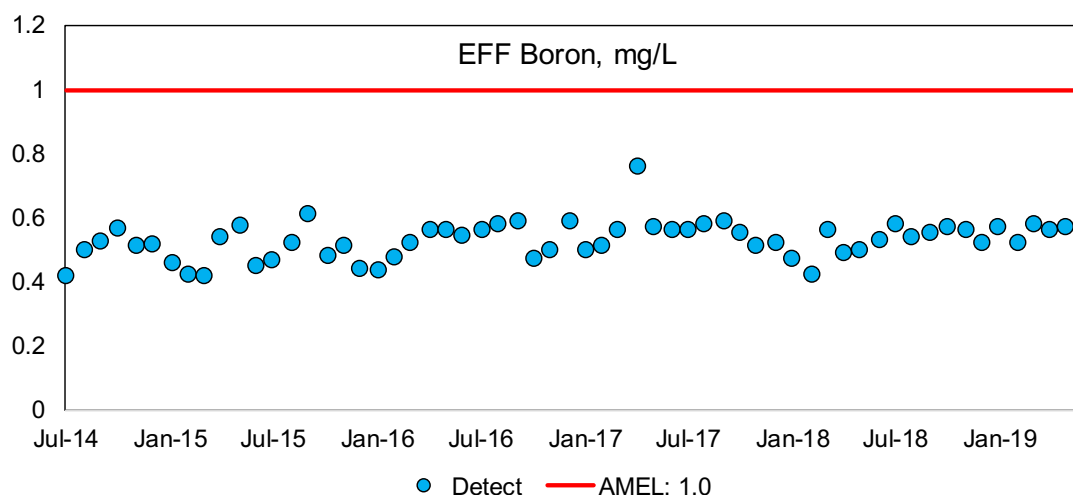
Title 22 MCLs are also referenced under the Groundwater objectives. However, even though groundwater recharge is not considered an acceptable justification to apply these objectives to the WRP discharge, MBAS is not specifically listed in the Tables referenced from Title 22 in Chapter 3 of the Basin Plan in the section under Groundwater – Chemical Constituents and Radioactivity (Basin Plan, pg. 3-18). Furthermore, Groundwater Recharge (GWR) is not a recognized or mandatory Clean Water Act use, so protection of this use is not required by federal law and requires additional analysis under Water Code sections 13263 and 13241 prior to imposing such an effluent limitation that is more stringent than required by federal law. *City of Burbank v. SWRCB*, 35 Cal. 4th 613, 618, 628 (2005). Further, application of MCLs at end of pipe ignores dilution in receiving waters and removal through soil aquifer treatment. No evidence has been presented that there is a lack of assimilative capacity in local aquifers that would justify an end-of-pipe effluent limit for MBAS equal to the MCL.

Section IV.C.2.b.viii. of the Fact Sheet (p. F-36) goes on to say that “*given the nature of the Facility which accepts domestic wastewater into the sewer system and treatment plant, and the characteristics of the pollutants discharges, the discharge has reasonable potential...*” This is not an adequate justification for requiring an effluent limit for MBAS (or any other pollutant without reasonable potential). The fact that a pollutant may be present in domestic wastewater in no way correlates with its potential for being discharged at a level that impacts the beneficial uses of the receiving water or causes an exceedance of an applicable water quality standard. This same reasoning would apply to any constituent that is regularly detected in wastewater treatment plant effluent and, unless the concentration of the constituent exceeds water quality criteria, the constituents are not assigned effluent limits. 40 C.F.R. §122.44(d)(1)(iii).

Therefore, given that the water quality criteria is not applicable and that, if it were, effluent concentrations never exceed the criterion, the District requests that the effluent limit for MBAS be removed as unnecessary.

3. Effluent limit for Boron

As shown below, boron also does not have reasonable potential to exceed the objective of 1 mg/L with a maximum effluent concentration of 0.6 mg/L and a maximum ambient concentration of 0.5 mg/L.



Additionally, the Salts TMDL does not include a WLA for boron for the Camarillo WRP because there were no exceedances of the objective in the receiving water or effluent at the time of TMDL development (see excerpt from Salts TMDL below). Therefore, the District requests that the effluent limit for boron be removed.

3. Final WLAs for POTWs^{a,d}

POTW	Chloride (lb/day) ^e	TDS (lb/day) ^e	Sulfate (lb/day) ^e	Boron (lb/day) ^e
Simi Valley WQCP	150*Q-AF	850*Q-AF	250*Q-AF	1.0*Q-AF
Hill Canyon WWTP	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Moorpark WWTP ^b	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Camarillo WRP ^b	150*Q-AF	850*Q-AF	250*Q-AF	N/A
Camrosa WRF ^b	150*Q-AF	850*Q-AF	250*Q-AF	N/A

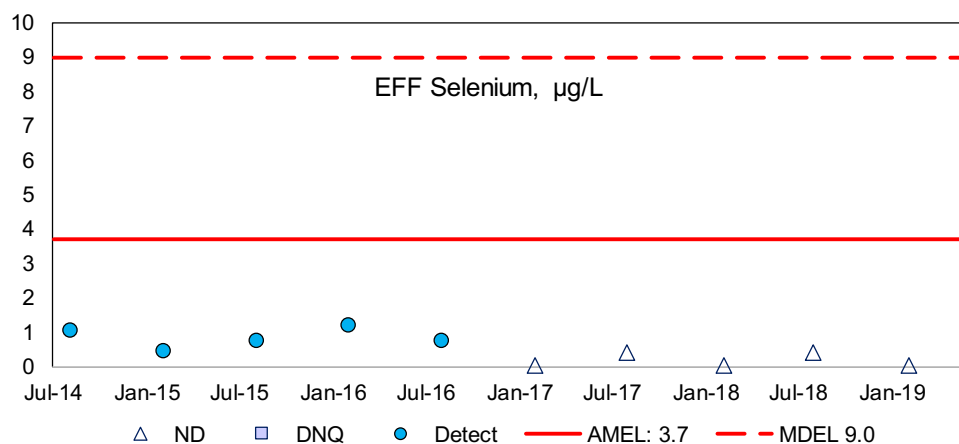
4. Effluent limits for chlorinated pesticides and PCBs

Table 4 of the Tentative Order contains effluent limits for chlordane, 4,4-DDD, 4,4-DDE, 4,4-DDT, dieldrin, PCBs and toxaphene. These effluent limits are based on the WLAs set forth in the CCW Organochlorine Pesticides, PCB and Siltation TMDL established in 2005 by the Regional Water Board. However, DDT and DDD have been not detected in the effluent or the receiving water since January 2009. Additionally, chlordane, 4,4-DDE, dieldrin, PCBs and toxaphene were not detected at all during the time frame for which data was evaluated for this permit (July 2014-June 2019). Therefore, there is no reasonable potential the effluent to cause or contribute to a water quality exceedance and the effluent limits should be removed from Table 4. See *accord City of Woodland v.*

California Regional Water Quality Control Board, Central Valley Region, Alameda County Superior Court Case No. RG04-188200 (May 16, 2005) at pgs. 4, 13. To address any concern associated with the TMDL, a detected value of one of these constituents at a level near the applicable WLA could be a trigger for a source investigation and detection at or above the applicable WLA would trigger reasonable potential and the related reopener clause.

5. Effluent limits for selenium

The Regional Board's RPA for selenium in the Tentative Order was based on an erroneous Maximum Receiving Water Concentration. Table F-7 in the Fact Sheet of the Tentative Order provides a maximum receiving water concentration of 36 $\mu\text{g/L}$, whereas the correct value based on monitoring data for 2014-2019 is 1.95 $\mu\text{g/L}$ (see Attachment 1). Using the corrected values, the maximum effluent concentration (MEC) and the maximum receiving water concentration (C) are both below the water quality criterion of 5 $\mu\text{g/L}$ (i.e., $\text{MEC} < \text{C}$, $\text{B} < \text{C}$; see chart below of effluent data). There is no reasonable potential for selenium, thus an effluent limit is not necessary.



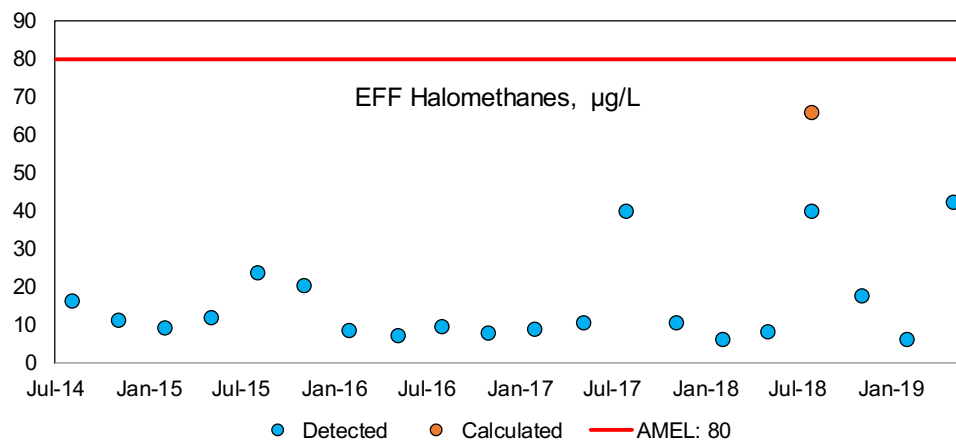
6. Effluent limit for Total Trihalomethanes (TTHM)

This is a new limit, and neither the 2014 permit nor 2019 Tentative Order have limits for the component constituents (chloroform, bromodichloromethane, dibromochloromethane, and bromoform). It is unusual to have an effluent limit for TTHM, and effluent limits for TTHM are not in the 2019 Tentative Orders for the Hill Canyon WWTP or Simi Valley WQCP.

The Regional Board apparently relied on the procedures of the TSD to conduct RPA for TTHM, and assigned an effluent limit equal to the MCL of 80 $\mu\text{g/L}$. The TSD analysis method is to calculate a projected maximum effluent concentration using 95th percentile multipliers, then apply a mass-balance using the ambient concentration and flows to determine the mixed downstream concentration. The effluent and ambient flow values used by the Regional Board in the mass balance were not presented in the Tentative Order Fact Sheet, therefore the Regional Board's TSD RPA results cannot be verified.

In addition, the TTHM MCL should apply only to receiving waters with the MUN beneficial use. For all of the reasons provided in comment 2 for MBAS, TTHM is not an appropriate effluent limit because MUN is not an existing beneficial use for the downstream receiving waters for the Camarillo WRP.

Finally, time series data for effluent do not show exceedances of the MCL (see chart below). The highest effluent concentration in Table F-2 of the Tentative Order is 66 $\mu\text{g/L}$.



The TTHM effluent limit is unnecessary and inappropriate and the District requests that it be removed.

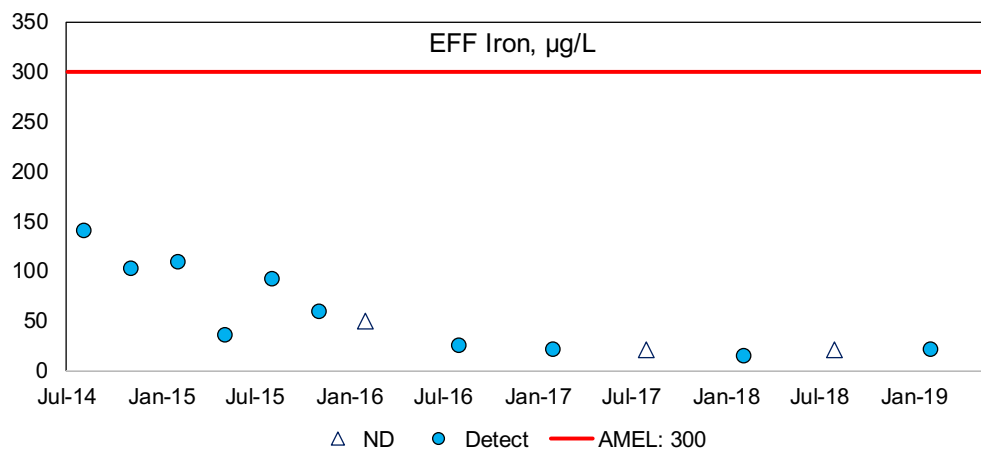
7. Effluent limit for iron

The Tentative Order has a concentration-based limit for iron equal to the secondary MCL (300 $\mu\text{g/L}$) and a load-based AMEL of 18 lbs/day. For the same reasons provided in Comments 2 and 6 (for MBAS and TTHM, respectively) it is improper to assign Title 22 primary or secondary MCLs to the effluent because MUN is not an existing beneficial use of the downstream receiving waters. Furthermore, iron is not listed as an MCL in the Basin Plan, and is not otherwise referred to in Chapter 3 (water quality objectives) in the Basin Plan. Finally, in Attachment F, at page F-41, the Tentative Order gives the following justification for the iron limit:

“The Gold Book contains criteria for iron: 300 $\mu\text{g/L}$ for the protection of domestic water supply and 1000 $\mu\text{g/L}$ for the protection of freshwater aquatic life. The secondary MCL for iron is also 300 $\mu\text{g/L}$. Since the discharge has reasonable potential to cause or contribute to an exceedance, a limit for iron, based on the 300 $\mu\text{g/L}$ criteria, is prescribed for the Camarillo WRP.”

The Gold Book (Quality Criteria for Water 1986, EPA 440/5-86-001) clearly states that an iron criterion of 0.3 mg/L is “for domestic water supplies”.

The District was not able to verify the Regional Board’s RPA for iron because iron is a non-CTR constituent requiring use of the TSD, and the effluent and ambient flow values used by the Regional Board in the mass balance were not provided in the Fact Sheet. The 2014-2019 time series of effluent iron concentrations shows that effluent does not exceed the MCL.



Upstream vs downstream receiving water data (see chart below) show that the Camarillo WRP effluent dilutes iron in the receiving water, confirming that the effluent does not have the potential to cause or contribute to an exceedance of the MCL in the receiving water.

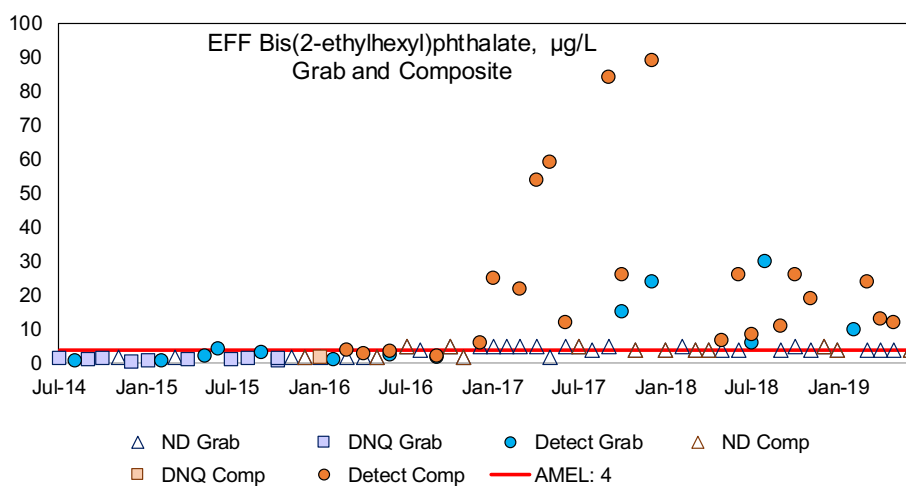
Therefore the District requests the removal of the effluent limits for iron.

Collection Date	Upstream RSW-001U Iron, Total, ug/L	Downstream RSW-002D Iron, Total, ug/L
8/6/2014	776	300
5/6/2015	595	345
8/5/2015	215	880
11/4/2015	2500	617
2/3/2016	1410	318
8/3/2016	1900	590
2/1/2017	6500	3000
8/2/2017	1300	330
2/7/2018	1300	210
8/1/2018	1000	430

8. Compliance with effluent limit for bis(2-ethylhexyl) phthalate

Starting in 2017, Camarillo WRP began having intermittent exceedances of the existing permit limit for Bis(2-Ethylhexyl) Phthalate (see chart below). The compliance

discussion in Attachment F, page F-16 acknowledges the issue, and says the District is investigating the cause and considering a local limit. However, it's possible that a pretreatment approach may not be effective for bis(2-ethylhexyl) phthalate. Issues with this constituent are typically related to monitoring sample handling (using plastic tubing, storage of plastic chemical totes outside, etc.) that can be corrected. Source control monitoring might be more effective. The District requests that the Regional Board consider developing a compliance schedule or TSO - with District input - to provide the District time to get back into compliance.



9. Temperature limit for effluent and characterization of surface water limitation

The 2014 permit for the Camarillo WRP contained a narrative effluent temperature limit that allowed effluent temperature to exceed 86°F when the ambient temperature of the receiving water exceeds 86°F, as follows:

“b. The temperature of the discharge shall not exceed 86°F except when the ambient temperature of the receiving water is higher than 86°F, in which case the temperature of the waste discharged shall not exceed the ambient temperature of the receiving waters.” (Order R4-2014-0062-A01 at IV.A.3.b, p. 10)

In addition, the 2014 permit contained an exception to the receiving water temperature limitation when temperature exceeded 86°F as result of (a) high temperature in the ambient air, or (b) high temperature in the receiving water upstream of the discharge as shown in the following excerpt (from Surface Water Limitations, Section V.A.1, p. 11, in Order No. R4-2014-0062-A01, CI-1278).

1. For waters designated with a warm freshwater habitat (WARM) beneficial use, the temperature of the receiving water at any time or place and within any given 24-hour period shall not be altered by more than 5°F above the natural temperature and shall not be raised above 86°F due to the discharge of effluent at the receiving water station located downstream of the discharge. Natural conditions shall be determined on a case-by-case basis.

If the receiving water temperature, downstream of the discharge, exceeds 86°F as a result of the following:

- a. High temperature in the ambient air; or,
- b. High temperature in the receiving water upstream of the discharge,

then the exceedance shall not be considered a violation.

However, the 2019 Tentative Order includes an effluent temperature limit of 86°F in Table 4, with no qualifications regarding ambient conditions, and the associated Surface Water Limitation in the Tentative Order does not provide an exception for receiving water temperatures above 86°F when caused by ambient conditions.

The District requests (1) that the (unqualified) effluent limit for temperature (86°F) in the Tentative Order in Table 4 be removed and replaced with a narrative effluent limit using language equivalent to that used in Order R4-2014-0062-A01 at IV.A.3.b, p. 10 (see above), and (2) that the surface water limitation in the Tentative Order be restated as it appeared in Section V.A.1. in the 2014 permit (as shown in the excerpt above from Surface Water Limitations, Section V.A.1, p. 11, in Order No. R4-2014-0062-A01, CI-1278).

10. Toxicity effluent limits and provisions

Numeric effluent limitations for chronic toxicity are listed in Table 4 on p. 8 of the Tentative Order as 'Pass' as a Median Monthly Effluent Limitation (MMEL) and 'Pass or <50% effect' as a Maximum Daily Effluent Limitation (MDEL). These limitations are consistent with the aquatic toxicity provisions in the State Water Resources Control Board (SWRCB) First Revised Draft Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California (First Revised Draft ISWEBE)¹. However, these limits are not consistent with Toxicity TMDL (Resolution No. R4-2004-009) which states that:

"WLAs would be implemented as a trigger for initiation of the TRE/TIE process as outlined in EPA's 'Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications Under the National Pollutant Discharge Elimination System Program' (2000) and current NPDES permits held by dischargers to the CCW."

¹https://www.waterboards.ca.gov/water_issues/programs/state_implementation_policy/docs/toxicity_2019_provisions_1strevdraft.pdf

Therefore, the District requests that the numeric effluent limits be changed to a trigger to be consistent with the Toxicity TMDL.

In addition, with respect to implementation, the Tentative Order is not consistent with the toxicity provisions in the First Revised Draft ISWEBE related to the triggering of toxicity reduction evaluations (TRE). The Tentative Order specifies accelerated monitoring to be triggered by a single exceedance of the effluent limitations with an additional four toxicity tests at approximately 2-week intervals, and if any of the tests fail, a TRE would be initiated and accelerated monitoring ended. Per the First Revised Draft ISWEBE, there is no accelerated monitoring after an exceedance of the effluent limitations², and a TRE would only be triggered³ if two or more effluent limitations are exceeded within two concurrent months (two in one month, or two or more over two concurrent months).

In Section III.A.23.c, the Tentative Order receiving water limitations require accelerated toxicity testing for the effluent if downstream receiving water toxicity cannot be attributed to upstream receiving water toxicity⁴. This provision could be interpreted to mean that accelerated testing would be required if upstream and effluent toxicity thresholds are met if the downstream toxicity is a 'Fail'. If the effluent toxicity test result is a 'pass', then it cannot be causing the downstream toxicity. The First Revised Draft ISWEBE does not contain accelerated monitoring and there is no discussion of linking receiving water results to actions for the effluent in the toxicity provisions.

Therefore, the District requests that the requirement to conduct accelerated testing be removed and the triggering for the TRE to be consistent with the Statewide Toxicity Provision.

11. Recycled water studies

Discharge Specification IV.C. of the Tentative Order requires the District to "*continue to investigate the feasibility of increasing the amount of recycling, conservation, and/or alternative disposal methods for wastewater (such as groundwater injection), and/or beneficial use of storm water and dry-weather urban runoff and submit an update to this feasibility study as part of the submittal of the Report of Waste Discharge (ROWD) for the next permit renewal.*" The District will commence diversion of all of its effluent to recycling or the regional brine line early in the next permit term. Therefore, it is requested that this requirement be removed.

²If routine monitoring is a longer frequency than monthly and an effluent limitation is exceeded, monitoring is required in the concurrent month.

³ A TRE may be required if there is evidence of toxicity (e.g. fish kills), or recurring intermittent toxicity.

⁴ "...if toxicity is observed upstream and downstream of the discharge, but effluent passes toxicity no accelerated monitoring is triggered."

12. Climate Change Plan

Provision VI.C.4.b. requires the District to prepare a Climate Change Effects Vulnerability Assessment and Mitigation Plan. The District is committed to protecting the treatment facility from the impacts of climate change but would appreciate some additional explanation of what is expected to be included in this plan.

13. Wetlands Requirements

Receiving Water Limitations in V. A.20 and V.A.21. refer to the protection of natural conditions in wetlands. However, the District does not discharge to a natural wetland. and should not have responsibility for “maintaining natural hydrologic conditions for wetlands” nor “maintaining natural substrates, food supplies, nursery areas and wildlife corridors”. Therefore, it is requested that these provisions be removed.

14. Monitoring program modifications and corrections

The Stakeholders Implementing the CCW TMDLs have been implementing a coordinated monitoring program for TMDL implementation for over 10 years (the “CCW TMDL Monitoring Program”, or CCWTMP). However, in Section IX.B., the Tentative Permit appears to describe a “Watershed Monitoring” program distinct from the CCW TMDL monitoring requirements acknowledged in Section IX.A. Furthermore, in Section IX.B.2 the Tentative Order requires the Permittee to “*submit annual reports providing the monitoring data collected during the calendar year, as well as an interpretation of the significance of the results with respect to the health of the watershed...by July 1st of each year.*” The due date of July 1st is not consistent with the submission date of the annual monitoring reports submitted on behalf of all CCW TMDL permittees by the CCW TMDL Monitoring Program (December 15th of each year), and thus it seems that the Regional Board is requiring that the Camarillo WRP submit an inconsistent, duplicative assessment of TMDL monitoring data of some kind. The CCWTMP has been established for over a decade and there is no need for individual NPDES permittees to submit additional reports. The District requests that Section IX.B. “Watershed Monitoring” be removed in its entirety.

Additionally, consistent with State Board Resolution 2013-0029 regarding ‘Reducing Costs of Compliance while Maintaining Water Quality Protection’, Water Board staff should work with Permittees to identify duplicative or unnecessary monitoring during reissuance of NPDES permits.

The District request the additional following changes to the monitoring program to reduce unnecessary monitoring:

- Monitoring under the approved Calleguas Creek Watershed TMDL Monitoring Program has established quarterly as the necessary monitoring frequency for determining compliance with the TMDL requirements. Please reduce the monitoring frequencies for effluent (Table E-3) and receiving water (Table E-

- 4) for all nitrogen and phosphorus compounds, copper, mercury, and nickel from monthly to quarterly consistent with the approved TMDL monitoring program.
- Because chlorinated pesticides have not been measured at concentrations above detection limits, the monitoring frequencies listed in Tables E-3 (Effluent Monitoring) and E-4 (receiving water monitoring requirements) for these constituents should be changed from quarterly to semi-annually. Based on historic data, more frequent monitoring is unnecessary. Specifically, this change is requested for 4,4-DDD, 4,4-DDE, 4,4-DDT, Dieldrin, Chlordane.
 - The requirement to test for PCBs in the influent (Table E-2) should be removed. PCB concentrations in receiving waters and effluent are always below detection limits so there is no reason to measure influent levels.
 - Similarly, there is no reason to monitor for total phosphorus, orthophosphorus, hardness, or boron in the influent. There are no applicable water quality criteria or other reasons for hardness, phosphorus or orthophosphorus to be measured in the influent.
 - There have been no exceedances of the objectives for mercury, nickel, selenium, iron, or boron in the effluent and, therefore, no reason to monitor them in influent. In addition, the monitoring frequency for these constituents in effluent should be reduced from monthly to quarterly.
 - There is no reason for monitoring of Total Organic Carbon in the receiving water. If monitoring requirements remain, the frequency should be changed from monthly to annually.

Additional comments and corrections regarding the MRP

- Sediment monitoring for mercury (p. E-16). The effluent discharges from locations EFF-001A & EFF-001B do not have any sediment and the District will not be able to monitor sediment in effluent. Monitoring for total mercury in effluent is sufficient to comply with the mercury limit. The District requests that this requirement be removed.
- Description of Receiving Water Monitoring Location RSW-003D. Table E-1. RSW-003D. The monitoring location description for RSW-003D should be changed as follows: *“Salts TMDL stream flow monitoring station at Calleguas Creek near California State University Channel Islands (CSUCI). For the purposes of this Order, this station is also known as RSW-003D (USGS 11106550) VCWPD Station 805.”*

In addition, it should be noted in the MRP that the mean daily flows from the VCWPD gauging station are published on-line at the discretion of the VCWPD and may not always be available in time for monthly monitoring reports. Daily discharge values for the co-located independent flow monitoring equipment

maintained by the CCWTMP is only published once per year, in December, when the CCWTMP Annual Monitoring Reports are submitted to the Regional Board.

- TMDL Stream Flow and Rainfall Monitoring. At Section VIII.B.1., p. E-27, the specifications of the streamflow and rainfall stations need to be corrected as follows:

“In order to determine the dry- and wet-weather flow conditions in the receiving water, the Permittee shall report the average daily flow at Calleguas Creek, collected from an existing stream flow gauging station located at ([VCWPD Station 805](#)) Calleguas Creek near the California State University Channel Islands (USGS 11106550). The Permittee shall also report the total daily rainfall from an existing rainfall gauging station located at the University of Channel Islands ([VCWPD Rain Gage Station 505](#)).”

- EFF-005. Pages E14 and E15 – The District is not sure where EFF-005 is located. This effluent location reference may be a typographical error.
- Table E3 - Arsenic is not listed, but listed on F10 as sample frequency moving from Quarterly to Semi-annually. Sampling frequency is currently monthly. Is the frequency in monitoring required to be: monthly, quarterly. or semi-annually?
- Calleguas Creek TMDL Monitoring and Reporting Requirements. In Attach. E, Section X.B. (p. E-30), the list of TMDLs covered by the CCWTMP needs to be corrected to include the Salts TMDL.

15. Additional Corrections and Modifications

Calleguas Creek TMDL Monitoring Requirement. A correction is needed to description of status of CCWTMP QAPP. The 2019 permit includes a paragraph at Section VI.C.2.a that incorrectly describes the status of the CCW TMDL QAPP with regards to the Salts TMDL. It fails to recognize that the CCW TMDL QAPP was revised in December 2014 and addressed the monitoring and reporting for all CCW TMDLs (Nitrogen, OCPs and PCBs, Toxicity, Salts, and Metals and Selenium).

Compliance with Calleguas Creek Salts TMDL effluent limitations. At Section VII.O. the specified stream gage used for determining when flows are less than 31 cfs needs to be changed because the USGS no longer maintains USGS gage 11106550. *The permit should now refer to VCWPD Station 805 for stream flow data at CSUCI and VCWPD Station 505 for rain gage data at CSUCI.*

Mandatory Minimum Penalties. In Section VII.D on p. 29, the District requests that the following statement regarding applicability of mandatory minimum penalties be added consistent with the language in VII.C.

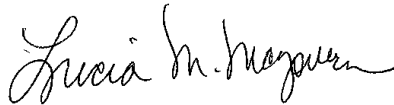
“If the average of daily discharges over a calendar week exceeds the AWEL for a given parameter, **this will represent a single violation for the purpose of calculating mandatory minimum penalties**, though an alleged violation will be flagged and the Permittee will be considered out of compliance for each day of that week for that parameter, resulting in 7 days of non-compliance ..”

Data Errors and Inconsistencies in Tables in Attachment F.

There are numerous inconsistencies and data errors in the tables in the Fact Sheet. These are illustrated in Attachment 1. The District requests that the tables be corrected, as indicated in the attachment.

If you have any questions regarding the District’s comments, please contact me at 805-388-5334 or by e-mail at lmcgovern@cityofcamarillo.org

Sincerely,



Lucia M. McGovern
Deputy Public Works Director/Env.

Attachment 1: Corrections to Tables in the Fact Sheet

Attachment 1. Corrections to Tables in the Fact Sheet

HISTORIC MONITORING DATA

Table F-2 in the Tentative Order contains errors and is not consistent with other parts of the permit. The corrected Table F-2 is shown in **Table 4** (corrected columns have yellow headers and corrections are in red text).

Regional Board's Table F-2 Historic Effluent Limitations and Monitoring Data

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Highest Average Monthly Discharge	Highest Daily Discharge
BOD ₅ 20°C	mg/L	20	30	45	2.4	4.2 12.2
Suspended Solids	mg/L	15	40	45	1.8	3.2 108
Oil and Grease	mg/L	10	--	15	<0.02	<0.02 2.28
Settleable Solids	ml/L	0.1	--	0.3	<0.1	<0.1
Residual Chlorine	mg/L	--	--	0.1	<0.005	5.8
Total Dissolved Solids	mg/L	850	--	--	1,031	1,268 1,200
MBAS	mg/L	0.5	--	--	0.05	0.1
CTAS	mg/L	--	--	--	<0.1	0.07
Chloride	mg/L	150	--	--	214	256
Sulfate	mg/L	250	--	--	204	309
Boron	mg/L	1	--	--	0.53	0.76
Fluoride	mg/L	--	--	--	0.53	0.69
Nitrate + Nitrite as N	mg/L	9	--	--	6.73	8.73
Ammonia-N	mg/L	3.5	--	7.8	1.16	1.73
Total phosphorus	mg/L	--	--	--	6.12	9.95
Orthophosphate-P	mg/L	--	--	--	5.42	8.72
Antimony	µg/L	--	--	--	0.37	0.84 0.66
Arsenic	µg/L	--	--	--	1.2	2.93
Beryllium	µg/L	4 No limit	--	--	<0.1	<0.1
Cadmium	µg/L	--	--	--	0.04	0.2 0.04
Chromium III	µg/L	--	--	--	0.43	0.94
Chromium VI	µg/L	--	--	--	0.20	0.37 0.48
Total chromium	µg/L	--	--	--	0.73	4.34 20
Copper	µg/L	23	--	42	4.48	9.43 17
Iron	µg/L	300	--	--	41	140
Lead	µg/L	--	--	--	0.2	0.99 0.41
Mercury	pg/L	0.015	--	--	0.0008	0.0018 0.015
Nickel	µg/L	110	--	276	3	4.9 10
Selenium	µg/L	--	--	--	0.38	1.2
Silver	µg/L	--	--	--	0.02	0.15

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Highest Average Monthly Discharge	Highest Daily Discharge
Thallium	µg/L	--	--	--	<0.02	<0.02
Zinc	µg/L	--	--	--	33.4	91.6 45.1
Total hardness	mg/L	--	--	--	376	425 420
Cyanide	µg/L	4.2	--	8.5	1.2	8.5 9.6
Asbestos	µg/L	--	--	--	--	--
2,3,7,8-TCDD (Dioxin)	pg/L	0.0140	--	0.0281	<3.84 pg/L	<3.84 pg/L
Acrolein	µg/L	--	--	--	<0.44	<0.44
Acrylonitrile	µg/L	--	--	--	<0.2	<0.2
Benzene	µg/L	--	--	--	<0.3	<0.3
Bromoform	µg/L	--	--	--	<0.23	<0.23
Carbon Tetrachloride	µg/L	--	--	--	<0.32	<0.32
Chlorobenzene	µg/L	--	--	--	<0.46	<0.46
Dibromochloromethane	µg/L	--	--	--	1.52	5.6
Chloroethane	µg/L	--	--	--	<0.21	<0.21
2-chloroethyl vinyl ether	µg/L	--	--	--	<1	<1
Chloroform	µg/L	--	--	--	13.3	47
Dichlorobromomethane	µg/L	--	--	--	<0.026	<0.026 13
Total trihalomethanes	µg/L	--	--	--	0.22	66
1,1-dichloroethane	µg/L	--	--	--	<0.32	<0.32
1,2-dichloroethane	µg/L	--	--	--	<0.28	<0.28
1,1-dichloroethylene	µg/L	--	--	--	<0.34	<0.34
1,2-dichloropropane	µg/L	--	--	--	<0.28	<0.28
1,3-dichloropropylene	µg/L	--	--	--	<0.26	<0.26
Ethylbenzene	µg/L	--	--	--	<0.43	<0.43
Methyl bromide	µg/L	--	--	--	<0.12	<0.12
Methyl chloride	µg/L	--	--	--	<0.27	<0.27
Methylene chloride	µg/L	--	--	--	<0.12	<0.12
1,1,2,2-Tetrachloroethane	µg/L	--	--	--	<0.34	<0.34
Tetrachloroethylene	µg/L	--	--	--	<0.35	<0.35
Toluene	µg/L	--	--	--	<0.45	<0.45
Trans 1,2-Dichloroethylene	µg/L	--	--	--	<0.32	<0.32
1,1,1-Trichloroethane	µg/L	--	--	--	<0.39	<0.39
1,1,2-Trichloroethane	µg/L	--	--	--	<0.29	<0.29
Trichloroethylene	µg/L	--	--	--	<0.35	<0.35
Vinyl Chloride	µg/L	--	--	--	<0.33	<0.33

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Highest Average Monthly Discharge	Highest Daily Discharge
2-chlorophenol	µg/L	--	--	--	<0.48	<0.48
2,4-dichlorophenol	µg/L	--	--	--	<0.75	<0.75
2,4-dimethylphenol	µg/L	--	--	--	<0.53	<0.53
4,6-dinitro-o- resol (aka 2- methyl-4,6-Dinitrophenol)	µg/L	--	--	--	<0.46	<0.46
2,4-dinitrophenol	µg/L	--	--	--	<0.33	<0.33
2-nitrophenol	µg/L	--	--	--	<0.67	<0.67
4-nitrophenol	µg/L	--	--	--	<0.67	<0.67
3-Methyl-4-Chlorophenol (aka P-chloro- m-cresol)	µg/L	--	--	--	<0.48	<0.48
Pentachlorophe nol	µg/L	--	--	--	<0.54	<0.54
Phenol	µg/L	--	--	--	<0.88	<0.88
2,4,6-trichlorophenol	µg/L	--	--	--	<0.47	<0.47
Acenaphthene	µg/L	--	--	--	<0.47	<0.47
Acenaphthylene	µg/L	--	--	--	<0.53	<0.53
Anthracene	µg/L	--	--	--	<0.48	<0.48
Benzidine	µg/L	--	--	--	<0.54	<0.54
Benzo(a)Anthra cene	µg/L	--	--	--	<0.34	<0.34
Benzo(a)Pyrene	µg/L	--	--	--	<0.23	<0.23
Benzo(b)Fluoranthene	µg/L	--	--	--	<0.34	<0.34
Benzo(ghi)Perylene	µg/L	--	--	--	<0.23	<0.23
Benzo(k)Fluoranthene	µg/L	--	--	--	<0.17	<0.17
Bis(2-Chloroethoxy) methane	µg/L	--	--	--	<0.54	<0.54
Bis(2-Chloroethyl) Ether	µg/L	--	--	--	<0.51	<0.51
Bis(2-Chloroisopropyl) Ether	µg/L	--	--	--	<0.41	<0.41
Bis(2- Ethylhexyl) Phthalate	µg/L	4	--	--	<0.94	<0.94 89
4-Bromophenyl Phenyl Ether	µg/L	--	--	--	<0.22	<0.22
Butylbenzyl Phthalate	µg/L	--	--	--	<0.66	<0.66
2-Chloronaphthalene	µg/L	--	--	--	<0.48	<0.48
4-Chlorophenyl Phenyl Ether	µg/L	--	--	--	<0.48	<0.48
Chrysene	µg/L	--	--	--	<0.48	<0.48
Dibenzo(a,h) Anthracene	µg/L	--	--	--	<0.19	<0.19
1,2-Dichlorobenzene	µg/L	--	--	--	<0.52	<0.52
1,3-Dichlorobenzene	µg/L	--	--	--	<0.51	<0.51

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Highest Average Monthly Discharge	Highest Daily Discharge
1,4-Dichlorobenzene	µg/L	--	--	--	<0.54	<0.54
3-3'-Dichlorobenzidine	µg/L	--	--	--	<0.69	<0.69
Diethyl Phthalate	µg/L	--	--	--	<0.53	<0.53
Dimethyl Phthalate	µg/L	--	--	--	<0.43	<0.43
Di-n-Butyl Phthalate	µg/L	--	--	--	<0.66	<0.66
2-4-Dinitrotoluene	µg/L	--	--	--	<0.56	<0.56
2-6-Dinitrotoluene	µg/L	--	--	--	<0.55	<0.55
Di-n-Octyl Phthalate	µg/L	--	--	--	<0.57	<0.57
1,2-Diphenylhydrazine	µg/L	--	--	--	<0.51	<0.51
Fluoranthene	µg/L	--	--	--	<0.53	<0.53
Fluorene	µg/L	--	--	--	<0.51	<0.51
Hexachlorobenzene	µg/L	--	--	--	<0.39	<0.39
Hexachloro-butadiene	µg/L	--	--	--	<0.37	<0.37
Hexachloro-cyclopentadiene	µg/L	--	--	--	<0.49	<0.49
Hexachloroethane	µg/L	--	--	--	<0.38	<0.38
Indeno(1,2,3-cd)Pyrene	µg/L	--	--	--	<0.39	<0.39
Isophorone	µg/L	--	--	--	<0.53	<0.53
Naphthalene	µg/L	--	--	--	<0.44	<0.44
Nitrobenzene	µg/L	--	--	--	<0.65	<0.65
N-Nitrosodi-methylamine	µg/L	--	--	--	<0.54	<0.54
N-Nitrosodi-n-Propylamine	µg/L	--	--	--	<0.6	<0.6
N-Nitrosodi-phenylamine	µg/L	--	--	--	<0.54	<0.54
Phenanthrene	µg/L	--	--	--	<0.45	<0.45
Pyrene	µg/L	--	--	--	<0.53	<0.53
1,2,4-Trichlorobenzene	µg/L	--	--	--	<0.46	<0.46
Aldrin	µg/L	0.00014	--	0.000281	<0.0015	<0.0015
Alpha-BHC	µg/L	0.013	--	0.026	<0.0018	<0.0018
Beta-BHC	µg/L	--	--	--	<0.0031	<0.0031
Gamma-BHC (aka Lindane)	µg/L	0.2 No limit	--	--	<0.0021	<0.0021
delta-BHC	µg/L	--	--	--	<0.0047	<0.0047
Chlordane	µg/L	0.00059	--	0.0012	<0.08	<0.08
4,4'-DDT	µg/L	0.00059	--	0.0012	<0.0030	<0.0030
4,4'-DDE	µg/L	0.00059	--	0.0012	<0.0025	<0.0025
4,4'-DDD	µg/L	0.00084	--	0.0017	<0.0031	<0.0031
Diazinon	µg/L	0.1	--	0.1	--	-- 0.032
Dieldrin	µg/L	0.00014	--	0.00028	<0.0021	<0.0021
Chlorpyrifos	µg/L	0.0133	--	0.024	--	-- <0.01

Parameter	Units	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit	Highest Average Monthly Discharge	Highest Daily Discharge
Alpha- Endosulfan	µg/L	--	--	--	<0.0017	<0.0017
Beta- Endosulfan	µg/L	--	--	--	<0.0019	<0.0019
Endosulfan Sulfate	µg/L	--	--	--	<0.0047	<0.0047
Endrin	µg/L	--	--	--	<0.0028	<0.0028
Endrin Aldehyde	µg/L	--	--	--	<0.003	<0.003
Heptachlor	µg/L	--	--	--	<0.0017	<0.0017
Heptachlor Epoxide	µg/L	-- 0.00011	--	-- 0.00022	<0.0019	<0.0019
Total PCBs	µg/L	0.00017	--	0.00034	<0.12	<0.12
PCB 1016	µg/L	--	--	--	<0.05	<0.05
PCB 1221	µg/L	--	--	--	<0.05	<0.05
PCB 1232	µg/L	--	--	--	<0.05	<0.05
PCB 1242	µg/L	--	--	--	<0.05	<0.05
PCB 1248	µg/L	--	--	--	<0.05	<0.05
PCB 1254	µg/L	--	--	--	<0.05	<0.05
PCB 1260	µg/L	--	--	--	<0.05	<0.05
Toxaphene	µg/L	0.00016	--	0.00033	<0.12	<0.12
1,4-Dioxane	µg/L	--	--	--	0.91	4 --
MTBE	µg/L	--	--	--	13.1	65.6 <1
Perchlorate	µg/L	--	--	--	<0.4	<0.4
1,2,3-Trichloropropane	µg/L	--	--	--	<0.005	<0.005
Chronic Toxicity		Pass		Pass or %Effect<50		

REASONABLE POTENTIAL ANALYSIS

Corrections to Regional Board's Table F-7 Summary of Reasonable Potential Analysis

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
1	Antimony	6	0.657	0.78	No	MEC<C, B<C
2	Arsenic	10	2.93	6.2	No	MEC<C, B<C
3	Beryllium	4	<0.1	<0.004	No	MEC<C, B<C
4	Cadmium	5	0.04	0.63	No	MEC<C, B<C
5a	Chromium III	600	0.937 20	10.85	No	MEC<C, B<C
5b	Chromium VI	50	0.367 0.48	4.9 0.624	No	MEC<C, B<C
6	Copper	TMDL 29	17	17	Yes	TMDL WLA
7	Lead	16	0.41	6.55	No	MEC<C, B<C

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
8	Mercury	0.022 lbs/month 2	0.0162 0.015	0.071 0.098	Yes, TMDL WLA	TMDL WLA
9	Nickel	470 160	4.9 10	47 10	Yes, TMDL WLA	TMDL WLA
10	Selenium	5	1.2	36 1.95	Yes No	B>C & effluent detected MEC<C, B<C
11	Silver	28	0.148	36 0.141	No	MEC<C, B<C
12	Thallium	2	0.021	0.03	No	MEC<C, B<C
13	Zinc	344 331	424 45.1	47	No	MEC<C, B<C
14	Cyanide	5.2	9.6	4	Yes	MEC>C (Tier 1)
15	Asbestos	7x106 fibers/L	No sample	No sample	No	N/A
16	2,3,7,8-TCDD (Dioxin)	1.4x10-08	<4.06	<4.06	No	MEC<C, B<C
17	Acrolein	780	<0.48	<0.48	No	MEC<C, B<C
18	Acrylonitrile	0.66	<2	<2	No	MEC<C, B<C
19	Benzene	1	<0.5	<0.5	No	MEC<C, B<C
20	Bromoform	360	0.9	<1 0.9	No	MEC<C, B<C
21	Carbon Tetrachloride	0.5	<1	<0.5	No	MEC<C, B<C
22	Chlorobenzene	21,000	<1	<0.5	No	MEC<C, B<C
23	Dibromochloro-methane	34	5.6	3.28 1.7	No	MEC<C, B<C
24	Chloroethane	No criteria	<1	<0.5	No	No criteria
25	2-chloroethyl vinyl ether	No criteria	<1	<1	No	No criteria
26	Chloroform	No criteria	47	6.66 16	No	No criteria
27	Dichlorobromo-methane	46	13	2.08 4.7	No	MEC<C, B<C
28	1,1-dichloroethane	5	< 1	<0.5	No	No criteria
29	1,2-dichloroethane	0.5	< 1	<0.5	No	MEC<C, B<C
30	1,1-dichloroethylene	3.2	< 1	<0.5	No	MEC<C, B<C
31	1,2-dichloropropane	5	< 1	<0.5	No	MEC<C, B<C
32	1,3-dichloropropylene	0.5	< 1	<0.5	No	MEC<C, B<C
33	Ethylbenzene	0.3	< 1	<0.5	No	MEC<C, B<C
34	Methyl bromide	4,000	< 1	<1	No	MEC<C, B<C
35	Methyl chloride	No criteria	< 1	<0.5	No	No criteria
36	Methylene chloride	1,600	< 1	<1	No	MEC<C, B<C

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
37	1,1,2,2-tetrachloroethane	1	< 1	<0.5	No	MEC<C, B<C
38	Tetrachloroethylene	5	< 1	<0.5	No	MEC<C, B<C
39	Toluene	150	< 1	<0.5	No	MEC<C, B<C
40	Trans 1,2-Dichloroethylene	10	< 1	<0.5	No	MEC<C, B<C
41	1,1,1-Trichloroethane	200	< 1	<0.5	No	MEC<C, B<C
42	1,1,2-Trichloroethane	5	< 1	<0.5	No	MEC<C, B<C
43	Trichloroethylene	5	< 1	<0.5	No	MEC<C, B<C
44	Vinyl Chloride	0.5	< 1	<0.5	No	MEC<C, B<C
45	2-chlorophenol	400	< 1	<1	No	MEC<C, B<C
46	2,4-dichlorophenol	790	< 1	<1	No	MEC<C, B<C
47	2,4-dimethylphenol	2,300	<5	<1.9	No	MEC<C, B<C
48	4,6-dinitro-o-cresol (aka 2-methyl-4,6-Dinitrophenol)	765	< 0.93	<0.93	No	MEC<C, B<C
49	2,4-dinitrophenol	14,000	< 4.7	<4.7	No	MEC<C, B<C
50	2-nitrophenol	No criteria	< 1.9	<1.9	No	No criteria
51	4-nitrophenol	No criteria	< 1.9	<1.9	No	No criteria
52	3-Methyl-4-Chlorophenol (aka P-chloro-m-cresol)	No criteria	< 1.9	<1	No	No criteria
53	Pentachlorophenol	1	< 1.9	<1	No	MEC<C, B<C
54	Phenol	4.6x10 ⁶	< 0.93	<0.93	No	MEC<C, B<C
55	2,4,6-trichlorophenol	6.5	< 0.93	<0.93	No	MEC<C, B<C
56	Acenaphthene	2,700	< 0.93	<0.93	No	MEC<C, B<C
57	Acenaphthylene	No criteria	< 0.93	<0.93	No	No criteria
58	Anthracene	110,000	< 0.93	<0.93	No	MEC<C, B<C
59	Benzidine	0.00054	< 9.3	<0.93	No	MEC<C, B<C
60	Benzo(a)Anthracene	0.049	< 9.3	<0.93	No	MEC<C, B<C
61	Benzo(a)Pyrene	0.049	< 9.3	<0.93	No	MEC<C, B<C
62	Benzo(b)Fluoranthene	0.049	< 9.3	<1	No	MEC<C, B<C
63	Benzo(ghi)Perylene	No criteria	< 9.3	<2	No	No criteria
64	Benzo(k)Fluoranthene	0.049	< 1	<1	No	MEC<C, B<C
65	Bis(2-Chloroethoxy)methane	No criteria	< 1	<1	No	No criteria

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
66	Bis(2-Chloroethyl) Ether	1.4	< 1	<1	No	MEC<C, B<C
67	Bis(2-Chloroisopropyl) Ether	170,000	< 1	<01	No	MEC<C, B<C
68	Bis(2-Ethylhexyl) Phthalate	4	89	85 200	Yes	MEC>C (Tier 1)
69	4-Bromophenyl Phenyl Ether	No criteria	< 1	<1	No	No criteria
70	Butylbenzyl Phthalate	5,200	< 1	<1	No	MEC<C, B<C
71	2-Chloronaphthalene	4,300	< 1	<0.93	No	MEC<C, B<C
72	4-Chlorophenyl Phenyl Ether	No criteria	< 1	<0.93	No	No criteria
73	Chrysene	0.049	< 1	<0.93	No	MEC<C, B<C
74	Dibenzo(a,h) Anthracene	0.049	< 1	<0.93	No	MEC<C, B<C
75	1,2-Dichlorobenzene	600	< 1	<0.93	No	MEC<C, B<C
76	1,3-Dichlorobenzene	2,600	< 1	<0.93	No	MEC<C, B<C
77	1,4-Dichlorobenzene	5	< 1	<0.93	No	MEC<C, B<C
78	3-3'-Dichlorobenzidine	0.077	< 1	<0.93	No	MEC<C, B<C
79	Diethyl Phthalate	120,000	< 1	<0.93	No	MEC<C, B<C
80	Dimethyl Phthalate	2.9x10 ⁶	< 1	<0.93	No	MEC<C, B<C
81	Di-n-Butyl Phthalate	12,000	< 1	<1	No	MEC<C, B<C
82	2-4-Dinitrotoluene	9.1	< 1	<0.93	No	MEC<C, B<C
83	2-6-Dinitrotoluene	No criteria	< 1	<0.93	No	No criteria
84	Di-n-Octyl Phthalate	No criteria	< 1	<0.93	No	No criteria
85	1,2-Diphenylhydrazine	0.54	< 1	<0.94	No	MEC<C, B<C
86	Fluoranthene	370	< 1	<0.93	No	MEC<C, B<C
87	Fluorene	14,000	< 1	<0.93	No	MEC<C, B<C
88	Hexachlorobenzene	0.00077	< 1	<0.93	No	MEC<C, B<C
89	Hexachlorobutadiene	50	< 1	<0.93	No	MEC<C, B<C
90	Hexachlorocyclopentadiene	17,000	< 1	<0.93	No	MEC<C, B<C
91	Hexachloroethane	8.9	< 1	<0.93	No	MEC<C, B<C
92	Indeno(1,2,3-cd) Pyrene	0.049	< 1	<0.93	No	MEC<C, B<C

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
93	Isophorone	600	< 1	<0.93	No	MEC<C, B<C
94	Naphthalene	No criteria	< 1	<0.93	No	No criteria
95	Nitrobenzene	1,900	< 1	<0.93	No	MEC<C, B<C
96	N-Nitrosodimethylamine	8.1	< 1	<1	No	MEC<C, B<C
97	N-Nitrosodi-n-Propylamine	1.4	< 1	<0.93	No	MEC<C, B<C
98	N-Nitrosodiphenylamine	16	< 1	<0.93	No	MEC<C, B<C
99	Phenanthrene	No criteria	< 1	<0.94	No	No criteria
100	Pyrene	11,000	< 1	<0.94	No	MEC<C, B<C
101	1,2,4-Trichlorobenzene	No criteria	< 1	<0.94	No	No criteria
102	Aldrin	0.00014	< 0.0047	<0.005	No	MEC<C, B<C
103	Alpha-BHC	0.013	< 0.0047	<0.005	No	MEC<C, B<C
104	Beta-BHC	0.046	< 0.0047	<0.005	No	MEC<C, B<C
105	Gamma-BHC (aka Lindane)	0.063	< 0.0047	<0.005	No	MEC<C, B<C
106	delta-BHC	No criteria	< 0.0047	<0.005	No	No criteria
107	Chlordane	0.00059	< 0.048	<0.048	Yes	TMDL WLA
108	4,4'-DDT	0.00059	< 0.0047	<0.005	Yes	TMDL WLA
109	4,4'-DDE	0.00059	< 0.0047	<0.005	Yes	TMDL WLA
110	4,4'-DDD	0.00084	< 0.0047	<0.005	Yes	TMDL WLA
111	Dieldrin	0.00014	< 0.0047	<0.005	Yes	TMDL WLA
112	Alpha-Endosulfan	0.056	< 0.0047	<0.02	No	MEC<C, B<C
113	Beta-Endosulfan	0.056	< 0.0047	<0.01	No	MEC<C, B<C
114	Endosulfan Sulfate	240	< 0.0047	<0.05	No	MEC<C, B<C
115	Endrin	0.036	< 0.0047	<0.01	No	MEC<C, B<C
116	Endrin Aldehyde	0.81	< 0.0047	<0.01	No	MEC<C, B<C
117	Heptachlor	0.00021	< 0.0047	<0.01	No	MEC<C, B<C
118	Heptachlor Epoxide	0.00011	< 0.0047	<0.005	No	MEC<C, B<C
119	PCB 1016	0.00017	< 0.48	<0.5	Yes	TMDL WLA
120	PCB 1221	0.00017	< 0.48	<0.5	Yes	TMDL WLA
121	PCB 1232	0.00017	< 0.48	<0.5	Yes	TMDL WLA
122	PCB 1242	0.00017	< 0.48	<0.5	Yes	TMDL WLA
123	PCB 1248	0.00017	< 0.48	<0.5	Yes	TMDL WLA
124	PCB 1254	0.00017	< 0.48	<0.5	Yes	TMDL WLA
125	PCB 1260	0.00017	< 0.48	<0.5	Yes	TMDL WLA
126	Toxaphene	0.00075	< 1.9	<0.5	Yes	TMDL WLA

CTR No.	Constituent	Applicable Water Quality Criteria	Max Effluent Conc.	Maximum Receiving Water Conc.	RPA Result	Reason
	Iron	300	140	6500	Yes	B>C & effluent detected
	Total trihalomethanes	80	66	8.99 22.4	Yes	TSD RPA

SUMMARY OF FINAL EFFLUENT LIMITS

Table F-9 in the Tentative Order contains errors and is not consistent with other parts of the permit. The corrected Table F-9 is shown in **Table 5** (corrections are in red text).

Table 5. Regional Board's Table F-9 Summary of Final Effluent Limitations for Discharge Points 001A & 001B

Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Basis
BOD ₅ 20°C	mg/L	20	30	45	Existing/ Secondary treatment
BOD ₅ 20°C	lbs/day ¹⁴	1,210	1,810	2,720	Existing/ Secondary treatment
TSS	mg/L	15	40	45	Existing/ Secondary treatment
TSS	lbs/day ¹⁴	910	2,420	2,720	Existing/ Secondary treatment
Temperature	°F	--	--	86	Existing
Removal Efficiency for BOD and TSS	%	≥85	--	--	Existing/ Technology base
Oil and Grease	mg/L	10	--	15	Existing/ Technology base
Oil and Grease	lbs/day ¹⁴	600	--	910	Existing/ Technology base
Settleable Solids	ml/L	0.1	--	0.3	Existing/ BPJ
Total Residual Chlorine	mg/L	--	--	0.1	Existing/ Basin Plan
Radioactivity ¹⁵					
Combined Radium-226 and Radium 228	pCi/L	5	--	--	Existing/ Title 22
Gross Alpha particle activity (excluding radon and uranium)	pCi/L	15	--	--	Existing/ Title 22
Uranium	pCi/L	20	--	--	Existing/ Title 22
Gross Beta/photon emitters	millirem/ year	4	--	--	Existing/ Title 22
Strontium-90	pCi/L	8	--	--	Existing/ Title 22

Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Basis
Tritium	pCi/L	20,000	--	--	Existing/ Title 22
Total coliform ¹⁶	MPN or CFU/100 mL	23	2.2	240	Existing/ Title 22
Total Dissolved Solids (dry- weather) ^{17, 18}	lbs/day	51,400	--	--	Existing, TMDL, Basin Plan
Total Dissolved Solids (wet- weather) ^{18, 19}	mg/L	850	--	--	Existing, TMDL, Basin Plan
Sulfate (dry- weather) ^{17, 18}	lbs/day	15,100	--	--	Existing, TMDL, Basin Plan
Sulfate (wet- weather) ^{18, 19}	mg/L	250	--	--	Existing, TMDL, Basin Plan
Chloride (dry- weather) ^{17, 18}	lbs/day	9,070	--	--	Existing, TMDL, Basin Plan
Chloride (wet- weather) ^{18, 19}	mg/L	150	--	--	Existing, TMDL, Basin Plan
Boron	lbs/day	60			
Boron	mg/l	1.0	--	--	Existing, TMDL, Basin Plan
MBAS	mg/L	0.5	--	--	Existing, Basin Plan
MBAS	lbs/day	30	--	--	Existing, TMDL, Basin Plan
Ammonia Nitrogen ²⁰	mg/L	3.5	--	7.8	TMDL
Ammonia Nitrogen	lbs/day	--	--	7 x Q ²¹	TMDL
Nitrate + Nitrite (as N)	mg/L	9	--	--	TMDL
Nitrate (as N)	mg/L	9	--	--	TMDL
Nitrite (as N)	mg/L	0.9	--	--	TMDL
Copper ²²	µg/L	9	--	13	TMDL
Copper	lbs/day	--	--	0.54	TMDL
Nickel ²²	µg/L	153	--	231	TMDL
Nickel ²²	lbs/day	--	--	0.2	TMDL
Mercury ²²	lbs/month	0.015	--	--	TMDL
Cyanide	µg/L	4.2	--	8.5	SIP/CTR
Cyanide	lbs/day ²⁰	0.25	--	0.51	SIP/CTR
Iron	µg/L	300	--	--	TSD/MCL
Iron	lbs/day	18	--	--	TSD/MCL
Total trihalomethanes	µg/L	80	--	--	TSD/MCL
Total trihalomethanes	lbs/day	5	--	--	TSD/MCL
Bis (2-Ethylhexyl) Phthalate	µg/L	4	--	--	SIP/CTR

Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Basis
Bis (2-Ethylhexyl) Phthalate	lbs/day ²⁰	0.24	--	--	SIP/CTR
Chlorpyrifos ²³	µg/L	0.0133	--	0.024	TMDL
Diazinon ²³	µg/L	0.1	--	0.1	TMDL
Chlordane	µg/L	0.00059	--	0.0012	TMDL
4,4'-DDD	µg/L	0.00084	--	0.0017	TMDL
4,4'-DDE	µg/L	0.00059	--	0.0012	TMDL
4,4'-DDT	µg/L	0.00059	--	0.0012	TMDL
Dieldrin	µg/L	0.00014	--	0.00028	TMDL
PCBs	µg/L	0.00017	--	0.00034	TMDL
Toxaphene	µg/L	0.00016	--	0.00033	TMDL
Chronic Toxicity ^{24,25}	Pass or Fail, % Effect (TST)	Pass ²⁶	--	Pass or % Effect < 50	TMDL, TST and USEPA Guidance