

**Attachment 1.B.  
Staff Changes to Forestville Water District NPDES Permit,  
Proposed Order No. R1-2012-0012**

<b>Page/Section</b>	<b>Description of and reason for change</b>	<b>Specifics of Change</b> (Strikeout indicates recommended deletions and underline indicates recommended additions to permit language)
Page 1 and throughout permit document	Permit order number change because the permit was originally scheduled for adoption in 2011 but was postponed to 2012 due the lack of a Board quorum for this issue. The Order change is being noted because the Order was originally noticed as Order No. R1-2011-0016	Order No. changed from R1-2011-0016 to R1-2012-0012
Page 2, Table 3	Change adoption, effective, and expiration dates	Adoption date changed from June 23, 2011 to January 19, 2012 Effective date changed from August 1, 2016 to March 1, 2012 ROWD due date changed from November 1, 2015 to June 1, 2016
Page 5, Table 4	Corrections regarding facility design flows. These changes are to correct inconsistencies between Table 4 in the permit and Table F-1 in the Fact Sheet	<p>“0.130 mgd (average daily dry weather <del>treatment capacity</del> <u>flow</u><sup>1</sup>) 0.58 mgd (<del>maximum daily treatment capacity</del> <u>peak weekly wet weather flow</u><sup>2</sup>) <u>0.78 mgd (peak daily wet weather flow<sup>3</sup>)</u>”</p> <p>Footnotes:  <sup>1</sup> Average daily dry weather <del>treatment capacity</del> <u>design flow</u> is defined as the average of daily inflows calculated during the lowest consecutive 30-day period each calendar year  <sup>2</sup> <u>Peak weekly wet weather design flow is defined as the maximum weekly average flow that may be treated, based on the capacity of the microfilters.</u>  <sup>3</sup> <u>Maximum Peak daily wet weather treatment capacity design flow</u> is defined as the highest amount <u>maximum volume</u> of effluent that may be treated, based on the capacity of the microfilters.”</p>

Page 6/Section II.B, 2 <sup>nd</sup> paragraph	Correction regarding design flows	"The treatment facility has design treatment capacities of 0.130 mgd (average daily dry weather flow), <del>and 0.58 mgd (maximum daily peak weekly wet weather flow),</del> and 0.78 mgd (peak daily wet weather flow). ..."
Page 6/Section II.B, 3 <sup>rd</sup> paragraph	Added language describing off-site storage pond at Sterling/Iron Horse Vineyards	"...a 14.7 million gallon off-site storage pond located at the <u>Sterling/Iron Horse Vineyards</u> ..."
Page 10/Section II.I	Minor wording change to provide clarification	"USEPA adopted the NTR on December 22, 1992, and later amended it on May 4, 1995 and November 9, 1999. About 40 criteria in the NTR <del>applied</del> <u>are applicable to discharges</u> in California...."
Page 10/Section II.J, last sentence	Removal of confusing sentence that didn't add necessary information to permit	<del>As of May 18, 2010, NPDES permits must contain final effluent limitations for CTR constituents that demonstrate reasonable potential.</del>
Page 11/Section II.M, 1 <sup>st</sup> paragraph, last sentence	Modified language regarding the basis for technology-based requirements to clarify that the more stringent requirements for tertiary treatment and associated effluent limitations for BOD <sub>5</sub> and TSS come from the Basin Plan	"...In addition, this Order contains effluent limitations for BOD <sub>5</sub> and TSS that are more stringent than the minimum federal technology-based requirements that are necessary to meet water quality standards <u>established in the Basin Plan</u> "
Page 15/Section IV.A.1.a Footnote 6	Minor changes to reflect that compliance determination language was moved to section VII.H (Compliance Determination section ) of the Order	" <u>See section VII.H of this Order regarding compliance with mass-based effluent limitations.</u> " <del>The mass discharge (lb/day) of any calendar week or month is obtained from the following calculation:</del>

		$\frac{8.34 \sum_i^N Q_i C_i}{N}$ <p>in which N is the number of samples analyzed in any calendar week or month. <math>Q_i</math> is the effluent flow rate (mgd) and <math>C_i</math> is average effluent concentration (mg/L) at Monitoring Location 001 (discharge to on-site effluent storage pond), respectively, which are associated with each of the N sample results which may be taken in any weekly or monthly period.</p>
Page 15/ Section IV.A.1.a, Footnote 8	Corrected language regarding flow criteria used to calculate wet-weather design flow	“...(not to exceed a <del>maximum daily treatment capacity</del> <u>peak weekly design flow</u> of 0.58 mgd).”
Page 15/ Section IV.A.1.a Footnote 9	Minor changes to reflect that compliance determination language was moved to section VII.H (Compliance Determination section ) of the Order	<p>“<u>See section VII.H of this Order regarding compliance with bacteriological limitations.</u> “</p> <p><del>Compliance with the 7-day median will be determined as a rolling median during periods when sampling occurs more frequently than weekly. During periods when sampling is weekly, this requirement shall apply to each weekly sample.</del></p>
Page 15/ Section IV.A.1.b	Corrected language	“...Percent removal of BOD <sub>5</sub> and TSS shall not be less than 85 percent. Percent removal shall be determined from the <del>30-day</del> <u>monthly</u> average value of influent wastewater concentration in comparison to the <del>30-day</del> <u>monthly</u> average value of effluent concentration for the same constituent over the same time period as measured at Monitoring Locations INT-001 (BOD <sub>5</sub> ) and EFF-001 (TSS)....”
Page 16, Section IV.A.2.a, Footnote 12	Changed effective date for final chlorine residual effluent limitations. This change is associated with changing the	“Final effluent limitations for total chorine residual become effective on <del>April 30, 2016</del> <u>March 1, 2017.</u> ”

	adoption date from May 5, 2011 to June 23, 2011	
Page 17/ Section IV.A.3.a	Changed final effective date for interim effluent limitations for chlorine residual. This change is associated with changing the adoption date from May 5, 2011 to June 23, 2011.	“Beginning on the effective date of this Order and ending <del>April 30, 2016</del> <u>February 28, 2017</u> , the Discharger shall maintain compliance with an interim effluent limitation for chlorine residual of 0.1 mg/L ...Final effluent limitations specified in section IV.A.2.a (Table 7) become effective on <del>June 1, 2016</del> <u>no later than February 28, 2017 in accordance with the compliance schedule in section V.C.7.a of this Order.</u> ”
Page 17/ Section IV.C.1.a	Deleted words that are duplicative of Section IV.C.1.b	“The Discharger shall comply with applicable state and local requirements regarding the production and use of reclaimed wastewater, including requirements of Water Code sections 13500 – 13577 (Water Reclamation) and California Department of Public Health (CDPH) regulations at title 22, sections 60301 – 60357 of the California Code of Regulations (Water Recycling Criteria) <del>and the specific requirements contained in Attachment G to this Order</del> ”.
Page 18/ Section IV.D.2	Minor modifications to eliminate redundancy	“a. When discharging to the recycled water system or <del>Jones Creek</del> the chlorine residual process shall ...”  c. When discharging to Jones Creek <del>and</del> when the filter effluent flow is less than 0.58 mgd ...”
Page 20/ Section V.A.9	Minor wording change	“The discharge shall not cause or contribute concentrations of <del>biostimulants</del> <u>biostimulatory substances</u> to receiving waters that promote objectionable aquatic growth to the extent that such growth causes nuisance or adversely affects beneficial uses.”
Page 30/	Added word to clarify intent of	“Conduct an <u>industrial</u> waste survey to identify all dischargers that

Section VI.C.5.b.iv	this requirement	might discharge pollutants that could pass through or interfere with the operation or performance of the Facility.”
Page 31/ Section VI.C.5.c.v	Corrected Order No. for statewide biosolids permit	Changed Order No. from <del>2000-10-DWQ</del> to <u>2004-12-DWQ</u> .
Page 33/ Section VI.C.7.a	Changed compliance dates for tasks associated with final effluent limitations for chlorine residual. These date changes are associated with changing the adoption date from June 23, 2011 to January 19, 2012.	Task 1 date changed from May 1, 2012 to March 1, 2013 Task 2 date changed from May 1, 2013 to March 1, 2014 Task 3 date changed from April 30, 2016 to no later than February 28, 2017
Pages 35-36/ Section VII.H	Added detailed language describing how to determine compliance with mass-based effluent limitations	<p><b><u>“H. Mass-Based Effluent Limitations</u></b></p> <p><u>Compliance with mass- and concentration-based effluent limitations for the same parameter shall be determined separately. Mass-based calculations shall use transfer flow rate and effluent concentration measured at EFF-001 (discharge to effluent storage pond).</u></p> <p>1. <u>Weekly Average. Compliance with the weekly mass-based average limitation shall be determined using the following formula:</u></p> <p><u>lbs/day = 8.34 * Ce * Q, where</u></p> <p><u>Ce = average of effluent concentrations collected during the calendar week (mg/L)</u></p>

		<p><u>Q = average flow rate averaged over the same calendar week (mgd)</u></p> <p>2. <u>Monthly Average. Compliance with the monthly mass-based average limitation shall be determined using the following formula:</u></p> <p><u>lbs/day = 8.34 * Ce * Q, where</u></p> <p><u>Ce = average of effluent concentrations collected during the calendar month (mg/L)</u></p> <p><u>Q = average flow rate averaged over the same calendar month (mgd)”</u></p>
<p>Page 36/ Section VII.I</p>	<p>Added detailed language describing how to determine compliance with bacteriological limitations</p>	<p><u>“I. Bacteriological Limitations (Total Coliform)</u></p> <p>1. <u>Median. The median is the central tendency concentration of the pollutant. The data set shall be ranked from low to high, ranking the ND concentrations lowest, DNQ determinations next, followed by quantified values. The order of the individual ND and DNQ determinations is not important. The median value is determined based on the number of data points in the set. If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, the median is the average of the two middle values, unless one or both points are ND or DNQ, in which case the median value shall be the lower of the two middle data points. DNQ is lower than a detected value, and ND is lower than DNQ.</u></p> <p>2. <u>Compliance with the 7-day median will be determined as a</u></p>

		<u>rolling median during periods when sampling occurs more frequently than weekly. During periods when sampling is weekly, this requirement shall apply to each weekly sample."</u>
<b>Attachment E – Monitoring and Reporting Program</b>		
Page E-4/ Sections III.A and IV.B, Footnotes 3 and 5	Removed requirement to report maximum daily flow. Maximum daily flow is not typically measured for pond based plants and is not the most meaningful measure of influent flow when all flow does not reach a WWTF by gravity	<p><u>"<sup>3</sup> Each month, the Discharger shall report <del>maximum daily, average daily flow rate</del> and average monthly flows."</u></p> <p><u>"<sup>5</sup> Each month, the Discharger shall report average daily, <del>maximum daily,</del> and average monthly flows."</u></p>
Page E-6/ Section IV.C, Table E-6, Footnote 16	Correction to section reference	"Monitoring for ammonia shall be concurrent with whole effluent toxicity monitoring (Section V.A.4 of this MRP)..."
Page E-6/ Section V.A.1	Incorrect table reference	Changed table reference from <del>Table E-4</del> to <u>Table E-6</u>
Page E-8, Section V.B.1	Incorrect table reference	Changed table reference from <del>Table E-4</del> to <u>Table E-6</u>
Page E-8/Section V.B.2	Changed sample type to grab samples since samples are collected from a storage pond and added clarifying statement	<u>"Sample Type. Effluent samples from Monitoring Location EFF-002 shall be <del>composite</del> grab samples. For toxicity tests requiring renewals, grab samples collected on consecutive days are required. When tests are conducted off-site, a minimum of three samples shall be collected, in accordance with USEPA test methods."</u>
Page E-15/ Section VIII.A, Table E-9	Add monitoring requirements for copper and cyanide in the upstream receiving water during	<u>"Copper, Total Recoverable<sup>25</sup>; ug/L; Grab; Monthly; Standard Methods"</u>

	periods of discharge	<u>"Cyanide<sup>25</sup>; ug/L; Grab; Monthly; Standard Methods"</u>
Page E-15/ Section IX.A.1.b	Correction to section reference	"Compliance with the 95 <sup>th</sup> percentile effluent turbidity limitation specified in section <del>IV.D.2</del> <u>IV.D.1.a.i</u> ..."
Page E-17/ Section IX.B.3	Minor language clarification	<u>"...Any Upon discovery of the equipment failure or effluent limitation exceedance, inadequately treated and disinfected wastewater shall be diverted to a storage basin or an upstream process for adequate treatment."</u>
Pages E-17-18 / Section X.B.1	Modified language to reflect that fact that electronic self-monitoring report submittal is now required	<p><del>"At any time during the term of this permit, the State or Regional Water Board may notify t</del>The Discharger <del>to electronically</del> shall submit <u>electronic Self-Monitoring Reports (eSMRs)</u> using the State Water Board's California Integrated Water Quality System (CIWQS) Program Web site (<a href="http://www.waterboards.ca.gov/ciwqs/index.html">http://www.waterboards.ca.gov/ciwqs/index.html</a>). <del>Until such notification is given, the Discharger shall submit hard copy SMRs.</del> The CIWQS Web site will provide additional directions for SMR submittal in the event there will be service interruption for electronic submittal. <u>The Discharger shall maintain sufficient staffing and resources to ensure it submits eSMRs that are complete and timely. This includes provision of training and supervision of individuals (e.g., Discharger personnel or consultant) on how to prepare and submit eSMRs.</u></p> <p><u>Until State or Regional Water Board staff provide notification to the Discharger, such notification is given,</u>the Discharger shall <u>also</u> submit hard copy SMRs."</p>
Page E-20/ Section X.C	Delete language related to Discharge Monitoring Reports	<u>"This section is not applicable to the Discharger because USEPA</u>

	<p>(DMRs) as this language only applies to major dischargers (&gt;1 mgd flow) and Forestville is a minor discharger (&lt;1 mgd flow)</p>	<p><u>does not require minor dischargers to submit DMRs.”</u></p> <p><del>1. As described in Section X.B.1 above, at any time during the term of this permit, the State or Regional Water Board may notify the Discharger to electronically submit SMRs that will satisfy federal requirements for submittal of Discharge Monitoring Reports (DMRs). Until such notification is given, the Discharger shall submit DMRs in accordance with the requirements described below.</del></p> <p><del>DMRs must be signed and certified as required by the standard provisions (Attachment D). The Discharger shall submit the original DMR and one copy of the DMR to the address listed below:</del></p> <table border="1" data-bbox="871 727 1843 1133"> <thead> <tr> <th data-bbox="871 727 1201 800"><b>STANDARD MAIL</b></th> <th data-bbox="1201 727 1843 800"><b>FEDEX/UPS/ OTHER PRIVATE CARRIERS</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="871 800 1201 1133"> <del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center PO Box 100 Sacramento, CA 95812-1000</del> </td> <td data-bbox="1201 800 1843 1133"> <del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center 1001 I Street, 15<sup>th</sup> Floor Sacramento, CA 95814</del> </td> </tr> </tbody> </table> <p><del>All discharge monitoring results required in accordance with C.2 above must be reported on the official USEPA pre-printed DMR forms (EPA Form 3320-1). Forms that are self-generated or modified cannot be accepted.</del></p>	<b>STANDARD MAIL</b>	<b>FEDEX/UPS/ OTHER PRIVATE CARRIERS</b>	<del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center PO Box 100 Sacramento, CA 95812-1000</del>	<del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center 1001 I Street, 15<sup>th</sup> Floor Sacramento, CA 95814</del>
<b>STANDARD MAIL</b>	<b>FEDEX/UPS/ OTHER PRIVATE CARRIERS</b>					
<del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center PO Box 100 Sacramento, CA 95812-1000</del>	<del>State Water Resources Control Board Division of Water Quality c/o DMR Processing Center 1001 I Street, 15<sup>th</sup> Floor Sacramento, CA 95814</del>					
<p>Page E-20/ Section X.D.1</p>	<p>Remove unnecessary language from paragraph. Reports</p>	<p>“The Discharger shall report the results of any special studies, acute and chronic toxicity testing, TRE/TIE, PMP, and Pollution Prevention</p>				

	associated with special studies have their own submittal dates thus the language requiring submittal with SMRs is incorrect.	Plan required by Special Provisions – VI.C.2 and VI.C.3 of this Order. <del>The Discharger shall submit reports with the first monthly SMR scheduled to be submitted on or immediately following the report due date in compliance with SMR reporting requirements described in subsection X.B.5 above.</del>
Page E-21/ Section X.D.2.a i.(d)	Add language acknowledging role of recycled water users in site inspections and violations reporting	“A summary of recycled water use site inspections conducted by the Discharger <u>or recycled water users</u> and identification of recycled water user violations, including: ...”
Page E-21/ Section X.D.2.a i.(h)	Added reporting language associated with Water Reclamation Requirement B.9.b of Attachment G	<u>“Documentation of the Discharger’s communication with recycled water users regarding nutrient concentrations in the recycled water pursuant to Water Reclamation Requirement B.9.b of Attachment G.”</u>
Page E-24/ Section X.D.3.h	Minor language deletion to remove duplicative statement that is in the introduction to this section	<b>“Source Control Activity Reporting.</b> The Discharger shall submit, as part of its annual report to the Regional Water Board, a description of the Discharger’s source control activities, as required by Provision VI.C.5.b. of this Order. ... <del>This annual report is due on March 1<sup>st</sup> of each year.</del> ”
Page E-24/ Section X.D.3.h.iv	Added word to clarify language	“A summary of any <u>industrial</u> waste survey results.”
<b>Attachment F – Fact Sheet</b>		
Page F-4, Table F-1	Corrections regarding facility design flows. These changes	“0.130 mgd (average <u>daily</u> dry-weather design flow <sup>1</sup> ) 0.58 mgd (peak weekly <u>wet-weather</u> design flow <sup>2</sup> )”

	<p>are to correct inconsistencies between Table 4 in the permit and Table F-1 in the Fact Sheet.</p>	<p>0.780 mgd (peak daily wet-weather design flow<sup>3</sup>)</p> <p>Footnotes:  <sup>1</sup> Average <u>daily</u> dry-weather design flow is defined as the average of daily inflows calculated during the lowest consecutive 30-day period each calendar year”  <sup>2</sup> Peak weekly <u>wet weather</u> design flow is defined as the maximum weekly average flow that may be treated, based on the capacity of the microfilters.  <sup>3</sup> Peak daily wet weather design flow is defined as the maximum volume of effluent that may be treated, based on the capacity of the microfilters.”</p>
<p>Page F-6/ Section II.A.2, 2<sup>nd</sup> paragraph</p>	<p>Modify language to include peak daily wet-weather flow and delete average monthly treatment capacity</p>	<p>“...The Facility is designed to provide tertiary treatment for up to an average daily dry-weather flow of 0.130 mgd, <del>an average maximum monthly treatment capacity of 0.357 mgd</del>, <u>a peak weekly wet weather flow of 0.58 mgd</u>, and a peak daily wet weather flow of 0.78 mgd.”</p>
<p>Page F-7/ Section II.A.2, 7<sup>th</sup> paragraph</p>	<p>Modify language to acknowledge that the chlorine residual needs were identified through a special study of the chlorine contact chamber</p>	<p>“...Chlorinated <del>wastewater</del> <u>effluent</u> then flows into one of two baffled concrete chambers. <u>A chlorine contact tank tracer study conducted in August 2005 demonstrated that the contact time is 105 minutes at the peak daily weekly treatment plant design flow of 0.58 mgd</u>, <del>the demonstrated contact time is 105 minutes</del>, <u>so and that a final chlorine residual of 4.3 mg/L is needed to maintain a contact time of 450 mg-min/L at the peak weekly design flow. The study also demonstrated that when the filter flow exceeds 0.58 mgd, up to the peak daily wet weather design flow of 0.78 mgd, a final chlorine residual of 5.3 mg/L is needed to maintain a contact time of 450 mg-min/L. ...</u>”</p>
<p>Pages F-15-16/ Section II.D.1, 4<sup>th</sup></p>	<p>Corrected section reference in second to last sentence</p>	<p>“...After final copper effluent limitations became effective on October 6, 2009 the discharger had <del>four</del> <u>three</u> violations of the average</p>

<p>paragraph</p>		<p>monthly effluent limitation.”</p> <p>“...In addition, the Discharger has requested that compliance with copper effluent limitations be based on effluent hardness rather than upstream receiving water hardness as discussed further in section <del>IV.C.3.b</del> <u>IV.C.3.g</u> of this Fact Sheet. ...”</p>
<p>Page F-16/ Section II.D.2.a and c</p>	<p>Added clarifying statement</p>	<p>The words “<u>by the Regional Water Board Executive Officer</u>” were added to each section to clarify that the ACLCs were issued by the Executive Officer, not the Regional Water Board</p>
<p>Page F-21-22/ Section III.D, 2<sup>nd</sup> paragraph and new 6<sup>th</sup> paragraph</p>	<p>Modified TMDL language to include the most recent USEPA approval date for the 303(d) list and to include a discussion of the Green Valley Creek listing for indicator bacteria</p>	<p><del>“In June 2007</del> <u>On October 11, 2011</u>, the USEPA provided final approval of the 303(d) list of impaired water bodies prepared by the State. The list identifies the entire Russian River watershed as impaired by excess sediment and elevated water temperatures <u>and Green Valley Creek as impaired for pathogenic indicator bacteria. ...”</u></p> <p><u>“The discharge is not anticipated to contribute to impairments of the receiving water by pathogenic indicator bacteria. The Discharger’s current disinfection system has demonstrated consistent compliance with coliform effluent limitations.”</u></p>
<p>Page F-24/ Section III.E.4, 3<sup>rd</sup> paragraph</p>	<p>Added statement that identifies how the permit addresses monitoring requirements identified in the Recycled Water Policy</p>	<p>“This Order is consistent with the requirements of the Recycled Water Policy. The Regional Water Board is developing a plan to address salt and nutrient management. This Order may be reopened to incorporate provisions consistent with any salt and nutrient management plan(s) adopted by the Regional Water Board. This Order allows for increased use of recycled water consistent with the mandate established in the Recycled Water Policy to increase the use of recycled water in California. <u>The Recycled Water Policy currently requires monitoring for chemicals of emerging concern (CEC) annually and for priority pollutants twice annually. The Recycled Water Policy is being revised to remove monitoring</u></p>

		<u>requirements for CECs based on recommendations of the CEC advisory panel that was appointed to review this issue, thus the MRP does not include monitoring requirements for CECs. The monitoring requirement for priority pollutants is addressed through CTR priority pollutant monitoring that is required of the Discharger pursuant to the SIP. The Discharger monitors for all CTR priority pollutants one time during each permit term and monitors more than twice per year for all CTR priority pollutants that exhibit reasonable potential.</u>
Page F-27/ Section IV.A.9	Correction of flow number. The peak daily treatment design flow is 0.78 mgd, not 0.58 mgd.	<p>"The peak daily wet-weather influent flow through the treatment system in excess of <del>0.58</del> <u>0.78</u> mgd is prohibited.</p> <p>This prohibition is new and is based on the current daily peak sustained wet-weather capacity of the treatment system of <del>0.58</del> <u>0.78</u> mgd..."</p>
Page F-30/ Section IV.B.5	Correct description of flow in last sentence	"...During wet-weather periods when the flow rate into the Facility exceeds 0.130 mgd, the mass effluent limitations may be calculated based on the actual daily average flow rate, not to exceed the <del>maximum sustained peak weekly design</del> flow of 0.58 mgd. "
Page F-31/ Section IV.B.6, Table F-6, Footnote 30	Correct description of flow	"During wet-weather periods, when the influent flow rate exceeds the dry-weather design flow, mass emission limitations shall be calculated using the concentration-based effluent limitations and the actual daily average influent flow rate (not to exceed a <del>maximum sustained the peak weekly design</del> flow rate of 0.58 mgd.)"
Page F-32/ Section IV.C.1, 2 <sup>nd</sup> paragraph, last sentence	Correct language to be consistent with requirements in MRP	"...The monitoring and reporting program establishes <del>weekly</del> <u>monthly</u> monitoring during periods of discharge to surface waters to develop a sufficient data based to determine reasonable potential. <del>The monitoring frequency will be reduced to monthly during periods of discharge once 10 samples have been collected and analyzed.</del> "
Page F-35/	Change effective date for final	"...Beginning <del>May 1, 2016</del> <u>March 1, 2017</u> , the Discharger shall

<p>Section IV.C.4.b., 2<sup>nd</sup> paragraph, last sentence</p>	<p>chlorine effluent limitations. This date change is associated with changing the adoption date from May 5, 2011 to June 23, 2011.</p>	<p>employ a method sensitive to and accurate at the permitted level of 0.01 mg/L.”</p>
<p>Page F-39/ Section IV.C.4.e, Concave- Downward Metals heading, 2<sup>nd</sup> paragraph</p>	<p>Correction</p>	<p>“...Copper is the only concave-upward <del>downward</del> metal that exhibits reasonable potential. ...”</p>
<p>Pages F-56-58/ Section IV.D.3, 3<sup>rd</sup> through 8<sup>th</sup> paragraphs</p>	<p>Added a sentence to the end of the 3<sup>rd</sup> paragraph to clarify the evaluation of CWA 13241 factors and modified language throughout the section, including addition of paragraphs 6 through 8, to describe economic analysis provided to the Regional Water Board regarding the Discharger’s economic analysis.</p>	<p>“In addition, the Regional Water Board has considered the factors in Water Code section 13263, including the provisions of Water Code section 13241, in establishing these requirements. <u>Factors set forth in section 13241 must be evaluated for requirements that go beyond what is required by the Clean Water Act.</u></p> <p>Water Code section 13263 requires that waste discharge requirements “<i>implement any relevant water quality control plans that have been adopted and take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance and the provisions of section 13241.</i>” These requirements, however, only apply to those portions of the permit that exceed the requirements of the federal CWA, and not to those requirements that are necessary to meet the technology-based effluent limitations or the WQBELs necessary to protect water quality objectives for surface waters set out in the Basin Plan. (<i>City of Burbank v. State Water Resources Control Board</i>, 35 Cal. 4th 613, 627.) In this Order, those requirements that exceed the requirements of the federal CWA are those that solely apply to the land discharge. Nonetheless, the Regional Water Board <del>considered the factors in</del></p>

	<p><del>Water Code sections 13263 and 13241 in establishing the requirements of discharges to surface waters and land, and concluded that the factors did not merit any change to the proposed effluent limits, discharge prohibitions, or receiving water limitations <u>has attempted to include permit terms that allow for compliance with all applicable federal and state requirements in the most cost effective manner possible.</u></del></p> <p>The Regional Water Board considered the factors set forth in section 13263 and 13241 throughout various portions of the permit, including Attachment F, which contains background information and rationale for the requirements set forth in the permit. The permit, in section II.H, and section III.C of Attachment F, identifies the beneficial uses identified in the Basin Plan. Section IV of Attachment F sets forth the rationale for the effluent limits, particularly the beneficial uses to be protected and water quality objectives required for that purpose. <u>All effluent limitations established for surface water discharges are required by the CWA, Basin Plan or CTR-SIP.</u> This section of the Fact Sheet sets out a discussion of the factors set forth in 13263 and 13241 considered for the effluent limits on the reclamation discharge. The Regional Water Board also considered upgrades to the Facility performed by the Discharger, along with other waste discharges in the watershed, and concluded that coordinated control of other discharges would not eliminate the need for the requirements on this discharge, particularly given the continued growth in the region and the past, present and probable future uses of the receiving waters and the environmental characteristics, including water quality, of the Guerneville hydrologic subarea of the Russian River. (See Attachment F, Section III.D, III.E, IV, and V.) The Regional Water Board also considered the need to develop and use recycled water, and the potential for increased reclamation opportunities. The</p>
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	<p>Regional Water Board also considered the need to prevent nuisance, and incorporated discharge prohibitions to protect against nuisance caused by the discharge or use for reclamation of untreated or partially treated waste from anywhere within the collection, treatment or disposal system or from sanitary sewer overflows. <del>Because other dischargers throughout the Russian River watershed have achieved compliance with similar limits, and the Discharger did not submit any evidence regarding the cost of compliance or its effect on the development of housing within the region, the Regional Water Board did not specifically address the issue of the Order's effects on housing or economic considerations.</del> <u>Monitoring and reporting requirements are established to assess compliance with effluent limitations and receiving water limitations. Monitoring frequencies are established based on threat to water quality and are consistent with monitoring frequencies required of other dischargers in the North Coast Region.</u></p> <p><u>The Discharger submitted an economic analysis with its ROWD that described the financial impacts of increased monitoring and technical report requirements. The Discharger stated that the residents in Forestville currently pay monthly sewer charges of \$100.82 per month per equivalent single-family dwelling (ESD) which will increase to \$105.92 per month beginning July 1, 2011 and that only one other community in Sonoma County pays higher rates than Forestville. As of July 1, 2011 Forestville Water District sewer rates will be 2.1 percent of median household income (MHI) OF \$62,000 per year (\$5166.67 per month) based on the 2010 census report. The financial analysis provided with the ROWD indicates that additional monitoring, data entry and reporting requirements would add costs that would require Forestville to increase monthly rates further. The analysis stated that a document prepared by the State</u></p>
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	<p><u>Water Board Small Community Wastewater Strategy staff indicates that a rate of 1.5 to 2 percent of MHI is generally an affordable baseline for evaluating sewer rate affordability. The financial analysis further states that Forestville is prepared to increase its rates in a moderate and incremental process, however, given that rates are already at the level considered affordable by the State Water Board, Forestville Water District requested that the Regional Water Board consider cost and true value in writing additional requirements into the renewed permit.</u></p> <p><u>Regional Water Board staff considered Forestville's economic analysis in establishing new permit requirements and carefully considered the cost and need for additional monitoring requirements. Although new permit requirements for reclamation and surface water discharges have been added to the proposed permit that were not in the prior permit, Regional Water Board staff carefully considered the priority and timing of new requirements. New requirements related to surface water discharges are discussed in the following paragraphs while new requirements related to reclamation are discussed in section IV.G Reclamation Specifications.</u></p> <p><u>As noted in the Discharger's consultant's comment letter dated April 1, 2011, the permit does not include addition of many of the monitoring requirements that the Discharger was concerned about. Monitoring frequencies for many constituents were retained at the same level as the previous permit. Some monitoring requirements that were included in Monitoring and Reporting Program No. R1-2004-0027 were eliminated, such as effluent monitoring for settleable solids, zinc, and lead, and receiving water monitoring for biochemical oxygen demand and zinc. Monitoring requirements were only increased where necessary. For example, effluent discharge and</u></p>
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<p>Page F-60/ Section Section IV.E.</p>	<p>Change language to acknowledge interim effluent limitation for chlorine residual</p>	<p><del>“No interim effluent limitations are established in this Order. An</del> <u>interim effluent limitation for chlorine residual of 0.1 mg/L, established in section IV.A.3 of the Order is effective through February 28, 2017.”</u></p>
<p>Page F-61/ Section IV.G.1, paragraphs 2 (last sentence) through 4</p>	<p>Modified language including addition of paragraphs 3 and 4, to describe economic analysis provided to the Regional Water Board regarding the Discharger’s economic analysis.</p>	<p><del>“...The Discharger did not submit any evidence regarding whether the waste discharge requirements for reclamation discharges would interfere with the development of needed housing within the region or the costs of compliance, particularly anything to show that the costs of compliance with the Order would be unmanageable.</del> <u>submitted an economic analysis with its ROWD describing the financial implications of increased monitoring and technical report requirements related to reclamation as discussed in detail in Fact Sheet section IV.D.3, paragraph 5. ...”</u></p> <p><u>“As stated in section IV.D.3, Regional Water Board staff considered Forestville’s economic analysis in establishing new permit requirements and carefully considered the cost and need for</u></p>

		<p><u>additional monitoring requirements. New requirements were added only as necessary.</u></p> <p><u>New technical report requirements, including VI.C.2.b (Technical Report(s) Regarding Existing Recycled Water Use Sites) and IV.C.2.c (Storage Pond Technical Report) are needed to assess compliance with new requirements that recycled water be applied at agronomic rates. The Order gives the Discharger most of the permit term to complete the technical report for existing recycled water use sites and the Storage Pond Technical Report only requires the gathering of existing information, postponing potential requirements for exploratory groundwater monitoring or corrective action to a future permit term. Effluent monitoring requirements were added for nutrients and salts due to the need to assess nitrogen and salt application rates for recycled water. The monitoring and reporting program allows for a potential reduction of some of these monitoring requirements if monitoring demonstrates no reasonable potential.”</u></p>
Page F-71/ Section VII.A.2.c	Correct section reference	“Order Provision <del>VI.A.2.d</del> <u>VI.A.2.c</u> requires the Discharger to file a petition with ...”
Page F-72/ Section VII.B.2.c	Removed unnecessary language	“...The Discharger will eventually need to demonstrate that storage of treated wastewater <del>meets the requirements of title 27 and is</del> protective of groundwater quality. ... “
Page F-78/ Section VIII.B, 2 <sup>nd</sup> paragraph	Add additional information regarding the public comment period	Add sentence as follows “ <u>The public comment period was extended to April 1, 2011 by way of revised public notices issued and posted on March 11, 2011.</u> ”
<p><b>Attachment G – Water Reclamation Requirements and Provisions</b></p>		

Page G-1/ Section A.3.a.ii	Modify to identify the fact that there is an exception to Forestville's agronomic use of recycled water	" <u>With the exception of frost protection uses,</u> the proposed irrigation uses will not exceed agronomic rates and will not occur when soils are saturated. ..."
Page G-2/ Section A.3.a.iii	Modified language to provide a more accurate representation of Order requirements.	"A salt and nutrient management plan has not been prepared for the groundwater basin underlying the recycled water use areas. <del>This Order includes a requirement that the Discharger must comply with any future salt and nutrient management plan adopted by the Regional Water Board.</del> <u>Order section 6.C.1.g states that the Order may be reopened to incorporate provisions consistent with any salt and nutrient management plan(s) adopted by the Regional Water Board.</u> "
Page G-3/ Section A.11	Language modified to be slightly more general to capture all applicable regulations	"The Discharger must demonstrate that the storage and use of recycled water complies with <u>applicable state regulations and the Basin Plan.</u> <del>The requirements of the California Water Code and title 27 of the CCR.</del> "
Page G-3/ Section A.12	This language provides the correct name for the vector control agency	"The Regional Water Board consulted with CDPH, the Sonoma County Health Department, and the <del>local</del> <u>Marin Sonoma</u> Mosquito and <u>Vector Control Abatement</u> District and considered any recommendations regarding public health aspects for this use of recycled water."
Page G-10/ Section D.1.a.i, second paragraph	Minor language change	"The water reclamation technical reports must be submitted prior to delivery of recycled water to any future recycled water use site. Provision VI.C.2.b of the Order requires the Discharger to submit a workplan to the Regional Water Board Executive Officer, identifying a plan and time schedule to submit technical information <u>required by section D to the Regional Water Board for existing recycled water use sites.</u> "

