

Regional Water Quality Control Board  
North Coast Region

Change Sheet

Thursday, April 7, 2016  
Eureka City Hall  
Eureka, California

**ITEM:** 2

**SUBJECT:** Public Hearing on Order No. R1-2016-0006 to consider adoption of proposed Waste Discharge Requirements for Mendocino County Water Works District No. 2, Anchor Bay Wastewater Treatment Facility, WDID No. 1B83118OMEN, NPDES No. CA0024040 (*Cathleen Goodwin*)

Several minor changes have been made to the proposed Order. These modifications consist of minor changes to standard language that were identified by Regional Water Board staff following the public comment period. Additions are shown in underlined text and deletions in strikeout text.

1. Order section V.B.2 was modified to change an incorrect reference to regulations, as follows:

“The collection, treatment, storage, and disposal of wastewater shall not cause alterations of groundwater that contain chemical concentrations in excess of limits specified in title 22, sections ~~64431~~64335 (Tables 2 and 3) and 64444, and the Basin Plan.”

2. Order section VI.C.4.b was modified to add a sentence to clarify operation and maintenance requirements, as follows:

“The Permittee shall maintain an updated Operation and Maintenance (O&M) Manual for the operational components of the Facility. The Permittee shall update the O&M Manual, as necessary, to conform to changes in operation and maintenance of the Facility. The Permittee shall operate and maintain the Facility in accordance with the most recently updated O&M Manual. The O&M Manual shall be readily available to operating personnel onsite and for review by state or federal inspectors. The O&M Manual shall include the following.”

3. Order sections VII.F and VII.G (second paragraph of each section) have been modified for clarification, as follows:

“If the Permittee monitors pH continuously, pursuant to 40 C.F.R. section 401.17, the Permittee shall be in compliance with the pH limitation specified herein provided that

both of the following conditions are satisfied: (1) the total sum of time during which the pH values are outside the required range of pH values shall not exceed 7 hours and 26 minutes in any calendar month; and (2) no individual excursion from the range of pH values shall exceed 60 minutes.”

4. Monitoring and Reporting Program, section IV.A.1, Table E-3 has been modified to correct several errors, as follows. Note that only the last four rows of the table and footnotes 6 and 9 are included here since that is where the corrections need to be made.

**Table E-3. Effluent Monitoring – Monitoring Location EFF-001**

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Oil and Grease <sup>6</sup>	mg/L	Grab	Annually	Standard Methods
Ammonia Nitrogen, Total (as N) <sup>6</sup>	mg/L	Grab	Monthly	Standard Methods
Ocean Plan Table 1 Pollutants <sup>7</sup>	µg/L	Grab/ Composite <sup>8</sup>	Once per permit term	Standard Methods
Chronic Toxicity <sup>9</sup>	Pass or Fail, % Effect	Grab	Twice per permit term	See Section V below
<p><b>Table Notes:</b></p> <p>6. Accelerated Monitoring (monthly <u>and annual</u> monitoring frequency). If a test result exceeds an effluent limitation the Permittee shall take two more samples, one within 14 days and one within 21 days following receipt of the initial sample result. During the intervening period, the Permittee shall take steps to identify the cause of the exceedance and take steps needed to return to compliance.</p> <p>9. Whole effluent <del>acute and</del> chronic toxicity shall be monitored in accordance with the requirements of section V of this Monitoring and Reporting Program.</p>				

The modifications to Table E-3 consist of:

- a. Addition of Footnote 6 to the table entry for Ammonia Nitrogen, Total;
  - b. Clarification that the accelerated monitoring requirement also applies to the parameter with an annual monitoring frequency (Oil and Grease); and
  - c. Removal of the reference to acute toxicity, because the Ocean Plan does not require acute toxicity when the minimum initial dilution of the effluent falls below 100:1 at the edge of the mixing zone. The Permittee’s minimum initial dilution is 35:1, thus no acute toxicity monitoring is required.
5. Monitoring and Reporting Program, section V.A.9.a has been grammatically modified, as follows:
- a. **Routine Reporting.** ~~Chronic toxicity monitoring results shall be submitted with the quarterly~~The SMR shall include a full laboratory report associated with the month that chronic toxicity monitoring was performed (WET report). Routine reporting shall include the following in order to demonstrate compliance with permit requirements:
    - i. WET ~~test~~ reports shall include the contracting laboratory’s complete report provided to the Permittee and shall be ~~in accordance~~ consistent with the appropriate “Report Preparation and Test Review” sections of the methods

manual and this MRP. The WET test reports shall contain a narrative report that includes details about WET test procedures and results, including the following:"

6. Monitoring and Reporting Program section VI.A.1, Table E-4 has been modified to require monitoring for aluminum, ammonia and chloride at Monitoring Location LND-001 two times per year, in June and September. Regional Water Board staff has determined that monitoring is needed to continue to verify that these pollutants are controlled in a manner to prevent exceedance of applicable water quality objectives. See also Item 7, below, which is the Fact Sheet section that provides the justification for these land disposal monitoring requirements.
7. Monitoring and Reporting Program section X.D.2.a has been modified to emphasize that tabular and graphical summaries should be submitted with the Annual Report, as appropriate. It is no longer necessary for most annual reports to include tabular data summaries due to the fact that all of the Permittee's data is submitted electronically to the state electronic reporting system.

~~"Where appropriate, Both tabular and/or where appropriate graphical summaries of the monitoring data and disposal records from the previous year. If the Permittee monitors any pollutant more frequently than required by this Order, using test procedures approved under 40 C.F.R. part 136 or as specified in this Order, the results of this monitoring shall be included in the calculation and report of the data submitted SMR."~~

8. Fact Sheet section VII.D.2 has been modified to add aluminum, ammonia, and chloride back to Monitoring and Reporting Program section VI.A.1, Table E-4. The Fact Sheet language is as follows:

Monitoring requirements for flow, BOD<sub>5</sub>, TSS, total coliform bacteria, pH, nitrate, total dissolved solids, and sodium have been retained from Order No. R1-2010-0038. Monitoring frequencies have been reduced for aluminum, nitrate, ammonia, total dissolved solids, chloride, and sodium to two times per irrigation season due to the fact that these pollutants have not been detected at levels that exceed any applicable water quality objectives, yet some monitoring is needed to continue to verify that these pollutants are controlled in a manner to prevent exceedance of applicable water quality objectives.