Attachment 2

Response to Comments
and Changes Made to Public Review Draft
City of Cloverdale Wastewater Treatment and Reclamation Facility
NPDES No. CA0022977, WDID No. 1B84032OSON
Waste Discharge Requirements Order No. R1-2012-0048

The City of Cloverdale sent a comment letter dated April 16, 2012, with comments on the draft WDRs (Order No. R1-2012-0048). In the following summary of Discharger comments, proposed additions to permit language are identified with underline and proposed deletions are identified with strikeout text.

Regional Water Board Staff also identified changes that needed to be made to the draft permit in order to provide clarity, correct typographical errors, and to provide consistency throughout the permit. These changes are summarized in Attachment 2A

Comment 1. The City requests that the wastewater treatment plant be classified as a minor facility. The City cites the definition of a major discharger from the USEPA website as "any NPDES facility … with design flows of greater than one million gallons" per day…" The City's design flow is 1 million gallons per day. [Page 4, Table 4]

Response: The definition cited in the City's comment contained an error regarding the definition of a major discharger. The USEPA definition of a major discharger can be found in the USEPA's Permit Writer's Manual, Chapter 2, section 2.4 (http://www.epa.gov/npdes/pubs/pwm_chapt_02.pdf). The definition reads as follows: "For POTWs, major facilities are those that have a design flow of one million gallons per day or greater or serve a population of 10,000 or more or cause significant water quality impacts."

The permit will retain the major discharge classification based on this definition.

No changes were made to the tentative permit in response to this comment.

Comment 2. The City requests an explanation why the total suspended solids (TSS) effluent limitations in the tentative Order have changed from an average monthly effluent limitation (AMEL) of 50 mg/L and AWEL of 45 mg/L to an AMEL of 45 mg/L and AWEL of 65 mg/L. [Page 9, Table 6]

Response: Fact Sheet section VI.B.1.b.i provides an explanation for the changes to the TSS effluent limitations. Cloverdale's previous Order contained an erroneous AWEL of 45 mg/L which is being corrected to 65 mg/L. The Code of Federal Regulations requires a minimum of secondary treatment and compliance with secondary effluent limitations for TSS (and BOD) of 30 mg/L (AMEL) and 45 mg/L (AWEL), but provides an exception for facilities that utilize waste stabilization ponds or trickling filters. Cloverdale is eligible for these equivalent to secondary requirements because it utilizes waste stabilization ponds and the treatment works provide significant biological treatment of municipal wastewater. The equivalent to secondary effluent

limitations for TSS (and BOD) are 45 mg/L (AMEL) and 65 mg/L (AWEL). Facility performance during the last permit term shows that the Facility can achieve standard secondary effluent limitations for BOD and equivalent to secondary effluent limitations for TSS. In comparison to the previous permit the AMEL for TSS is slightly more stringent, while the AWEL is less stringent (due to the error in the previous permit).

No changes were made to the tentative permit in response to this comment.

Comment 3. The City requests clarification regarding how Groundwater Limitation V.B.5 will be interpreted for compliance purposes. The City specifically wants to know if this limitation applies to the existing shallow groundwater monitoring well network and whether total coliform exceeding 1.1 MPN per 100 milliliters or 1 colony per 100 milliliters would be interpreted as a violation of Groundwater Limitation V.B.5. [Page 13]

Response: Groundwater Limitation V.B.5 of the March 14, 2012 public review draft has been removed from the final draft of the permit as follows: "~~In groundwater used for domestic and municipal supply (MUN), the collection, treatment, storage and disposal of the treated wastewater shall not cause the median concentration of coliform organisms over any 7-day period to exceed 1.1 MPN per 100 milliliters or 1 colony per 100 milliliters.~~ " The groundwater limitation is not necessary at this time due to the fact that Groundwater Limitation V.B.1 is broad enough to address protection of groundwater. Groundwater monitoring data collected during the upcoming permit term will be evaluated in conjunction with historic groundwater monitoring data to determine whether the discharge from the percolation pond is impacting groundwater. Evaluation of the monitoring data will also consider the fact that other land uses, as well as the river, may be impacting shallow groundwater. For example, the City has provided groundwater monitoring data from its water supply wells (that are upstream of the wastewater treatment plant) that demonstrate a surface water influence on groundwater. The City has a water treatment plant that provides treatment and disinfection of its water supply.

In addition, Receiving Water Monitoring Requirement VIII.B of the MRP has been deleted as follows: "~~The Discharger shall submit a written plan to demonstrate compliance with Receiving Water Limitation V.B.5 of the Order.~~"

Receiving Water Monitoring Requirement VIII.B.2 in the MRP also requires the City to submit a Quality Assurance/Quality Control Plan for its groundwater monitoring program. The goal is to ensure that all groundwater data collected by the City is reliable and defensible.

Comment 4. The City requests clarification regarding the constituents that will need to be sampled to satisfy the requirement in Provision VI.C.5.b.iii.(a) which requires the City to conduct priority pollutant monitoring of the influent. [Page 21]

Response: In response to this comment, Provision VI.C.5.b.iii.(a) has been modified to include a footnote clarifying the pollutants that should be monitored as part of the influent priority pollutant analysis. The new Footnote 9 reads as follows: "The priority pollutant scan shall include CTR and title 22 pollutants. CTR pollutants are those pollutants identified in the California Toxics Rule at 40 CFR 131.38 and title 22 pollutants are those pollutants for which the California Department of Public Health has established Maximum Contaminant Levels (MCLs) at title 22, division 4, chapter 15, sections 64431 (Inorganic Chemicals) and 64444 (Organic Chemicals) of the California Code of Regulations. Duplicate analyses are not required for pollutants that are identified as CTR and title 22 pollutants."

Comment 5. The City requests clarification regarding the requirement in Provision VI.B.6.a to obtain coverage under State Water Board Order No. 97-03-DWQ, NPDES General Permit No. CAS000001, and cites the Finding in Fact Sheet section VII.B.6.a that states that all storm water within the Facility's NPDES permitted process areas are captured by the aeration and percolation ponds. [Page 25]

Response: Provision VI.B.6.a is a standard permit provision and states that coverage shall be obtained "if applicable". At a Facility where all storm water in the process areas are captured, there is no need to apply for the industrial storm water permit.

No changes were made to the tentative permit in response to this comment.

Comment 6: The addition of new receiving water monitoring locations RSW-001 and RSW-002 seems redundant of monitoring that is already done in the Russian River at monitoring locations SS-1 and SS-2 in relation to the City's groundwater monitoring program. [Page E-14]

Response*:* Table E-2 of the Monitoring and Reporting Program describes the monitoring locations established in the permit. Monitoring Locations SS-1 and SS-2 are to be sited upstream and downstream of the percolation ponds and are for the purpose of monitoring for impacts from the discharge to the percolation ponds. Monitoring Locations RSW-001 and RSW-002 are to be sited immediately upstream and downstream of the discharge outfall and sampled during any direct discharge through the discharge outfall pipe to the Russian River.

Modifications were made to Tables E-7, E-8, and E-9 of the MRP to provide clarity and correct confusion regarding monitoring requirements for RSW-001, RSW-002, SS-1, and SS-2 as follows:

Section VIII.A.2 of the MRP, including the narrative paragraph and Table E-7 has been modified as follows:

"2. The ~~Discharger~~ Permittee shall monitor upstream and downstream conditions in the Russian River at Monitoring Locations ~~RSW-001 and RSW-002~~ SS-001 and SS-002, respectively, during periods of discharge to the percolation ponds as follows:"

Table E-7. Receiving Water Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
pH[9]	standard units	Grab	~~4X/Discharge Season~~[16] Quarterly	Standard Methods
Nitrate	mg/L	Grab	Quarterly	Standard Methods
Specific Conductance	µmhos/cm	Meter	Quarterly	Standard Methods
Chloride	mg/L	Grab	Quarterly	Standard Methods
Temperature[9]	°F or °C	Grab	~~4X/Discharge Season~~[16] Quarterly	Standard Methods
Hardness, Total (as $CaCO_3$)[6]	mg/L	Grab	~~4X/Discharge Season~~[16] Quarterly	Standard Methods

Section VIII.B.1(narrative paragraph introducing Table E-8) of the MRP has been modified as follows:

"1. The ~~Discharger~~Permittee shall monitor groundwater at Monitoring Locations GW-001, GW-007, GW-009, GW-010, GW-011, GW-012, GW-013, GW-014, GW-015, and GW-016, ~~SS-1 and SS-2~~ as follows:"

Section X.B.4, Table E-9 has been modified as follows:

Table E-9. Monitoring Periods and Reporting Schedule

Sampling Frequency	Monitoring Period Begins On…	Monitoring Period	SMR Due Date
Quarterly	October 1 following permit effective date	January 1-31, April 1-30, July 1-31, and October 1-31	First day of second calendar month following month of sampling

Comment 7: Footnote 6 to Table E-5 in the MRP includes a reference to monitoring for lead, yet there are no requirements to monitor for lead. [Page E-5]

Response: The City is correct in pointing out that this reference to lead was included in the draft permit in error. Footnote 6 to Table E-5 has been modified to read as follows: "Monitoring for effluent and receiving water hardness shall be conducted concurrently with effluent sampling for copper ~~and lead~~."

Comment 8: The City points out that there are numerous incorrect footnote superscript number references throughout the tables in Attachment E (MRP) and requests that Regional Board staff review and correct the reference numbers.

Response: Regional Board staff carefully corrected all erroneous footnote references in Tables E-4, E-5, E-6, and E-7 of the MRP and Tables F-2 and F-5 of the Fact Sheet.

Comment 9: Fact Sheet Table F-8 lists the maximum daily effluent limitation (MDEL) for dichlorobromomethane incorrectly as 0.11 µg/L.

Response: Fact Sheet Table F-8 has been corrected as follows to show the MDEL for dichlorobromomethane as 1.1 µg/L.

Table F-8. Determination of Final WQBELs Based on Human Health Criteria

Pollutant	Units	ECA	MDEL/AMEL	MDEL	AMEL
Chlorodibromomethane	µg/L	0.41	2.0	0.82	0.41
Dichlorobromomethane	µg/L	0.56	2.0	~~0.11~~ 1.1	0.56

Changes Made by Regional Water Board Staff

Changes recommended by Regional Water Board Staff are summarized in the attached table (Attachment 2A).