



City of Healdsburg

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April 4, 2016

Ms. Cathleen Goodwin
 Water Resource Control Engineer
 California Regional Water Quality Control Board
 North Coast Region
 5550 Skylane Blvd., Suite A
 Santa Rosa, CA 95403

Subject: City of Healdsburg Comments to Draft NPDES Permit No. CA0025135
 and Draft Cease and Desist Order R1-2016-0016

Dear Ms. Goodwin:

This letter transmits the City of Healdsburg's (City's) comments to the subject draft discharge permit and draft cease and desist order (CDO). Where appropriate, we have provided the rationale for our comment and proposed changes.

City Comments to the Draft NPDES Permit

Location	Comment
Page A-5 Test of Significant Toxicity	<p>Test of Significant Toxicity (TST) requirement is a departure from the Toxicity Units (TUc) toxicity testing previously required. The City of Healdsburg takes exception to this requirement because</p> <ol style="list-style-type: none"> 1. The previous method tests the hypothesis that the effluent is not toxic, whereas the TST method tests the hypothesis that the effluent is toxic. 2. The TST method has been cited as having a higher incidence of false positive results. The Board has indicated that it believes lack of quality data and analyses is at the cause of the false positive claims for TST. However, this approach increases the discharger's liability for a flawed test rather than on impaired water quality. 3. The 5-concentration testing method which was previously required has the quality control and is widely accepted. 4. The TUc provides the discharger with a sense of the degree of toxicity so that the results can be used for process adjustment. TST is a PASS/FAIL result and does not provide useful input for adjustment by the discharger.
E-14, IX B.1.c., second sentence	<p>"The permittee shall report daily average and minimum flow through the UV disinfection system."</p> <p>We believe that "daily average and maximum flow" was intended here.</p>
Page F-3 Table F-1	<p>Authorized Person to Sign and Submit reports should include "or other staff with signature authority." Reports and correspondence may be under the signature of the Wastewater Superintendent or Principal Engineer.</p>
Page F-4 II.A	<p><i>Basalt Pond is physically connected to Russian within the Geyserville Hydrologic Subarea of the Russian River Hydrologic Unit.</i></p> <p><i>Typo—missing the word "River" following the first "Russian"</i></p>

<p>Page F-7, Table F-2</p>	<p>The lowest observed acute toxicity percent survival is 65% (ceriodaphnia).</p> <p>This was the round of testing that triggered accelerated monitoring and ceriodaphnia as the most sensitive species (as opposed to trout). The results of the accelerated monitoring were 100% and 95% survival, allowing us to return to the usual monitoring frequency for acute toxicity, but switching species from trout to ceriodaphnia. Problems continued with the chronic toxicity tests (only with ceriodaphnia reproduction), so we repeated testing several times before contacting another lab for a review of the toxicity results.</p> <p>Since acute toxicity was no longer as pressing of an issue as the chronic, we didn't request any review of the test at the time. The strange thing is that the samples for the Acute Toxicity Bioassay resulting in 65% survival (ceriodaphnia) were split from the same samples used in the concurrent three species Chronic Toxicity Bioassay that exhibited no toxicity in survival, growth or reproduction in any of the species including ceriodaphnia.</p> <p>The TUC approach, which has less tendency for false positive can still produce them. Where the TUC provided data to indicate that the results for the tests in question were suspect, the TST might not have been clear in indicating that the results might be suspect and re-testing is in order.</p>
<p>Pg. F-12 <i>III.D last sentence</i></p>	<p>"The Study found that temperatures in the Basalt Pond are consistently a few degrees warmer in the effluent but data indicate that the influence on temperatures on Basalt Pond are minimal.</p> <p><i>This should be revised to read:</i></p> <p>"The Study found that temperatures in the effluent are consistently a few degrees warmer than in the Basalt Pond but data indicate that the influence on temperatures on Basalt Pond are minimal."</p>

City Comments to the Draft CDO

<p>CDO #21</p>	<p>Date of "June 12, 2016" should read "June 16, 2016"</p>
<p>CDO No. R1-2010-0033, Task B and Task D</p>	<p>Complete construction of recycled water transmission pipeline to serve approximately 2,000 acres in total or as required to increase the Permittee's recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015 - To be completed by September 30, 2019</p> <p>The City is working with vineyard managers and owners to bring additional acreages into the recycled water program as quickly as possible. The Board should be cognizant that drought and dryer than normal years make the vineyard managers and owners more motivated to receive the recycled water than wet years do. Wet years are part of the normal weather pattern and may slow progress on Tasks B and D.</p> <p>Additionally, normal to wet precipitation seasons may reduce irrigation demand/consumption in certain years. The City is in the process of discussing vineyard water usage and other pertinent parameters with local vintners. It may be possible that the City could achieve the requirement of Task B, but not achieve Task D consistently due to circumstances the City cannot control.</p>

	<p>The City is preparing an estimated timeline to comply with the permit requirements that accounts for the schedule to build the recycled water distribution system as well as potential uptake and usage rates of end users. The City recommends that Task D be revised to serving recycled water to 2,000 acres by September 30, 2019. We request that Task D have the following phase deleted: "or as required to increase the Permittee's recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015".</p> <p>The City also requests that the Board add Task E as follows: "Task E: Complete construction of recycled water transmission pipeline to serve additional acreage as required to increase the Permittee's recycled water use to achieve compliance with Discharge Prohibition III.1 of Waste Discharge Requirements Order No. R1-2016-0015 – To Be Completed by September 30, 2024.</p>
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Please let us know if you have any questions on the above comments to the draft discharge permit and draft CDO.

Best regards,

CITY OF HEALDSBURG



Patrick D. Fuss, P.E.
Principal Water/Wastewater Engineer

PDF:

Cc: David Mickaelian, City Manager
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