Response to Written Comments

In Consideration of Waste Discharge Requirements Order No. R1-2016-0001, National Pollutant Discharge Elimination System (NPDES) and Accompanying Cease and Desist Order No. R1-2016-0012 for the City of Eureka Elk River Wastewater Treatment Plant

Regional Water Quality Control Board, North Coast Region
June 16, 2016

Comment Letters Received

The deadline for submission of public comments regarding draft Waste Discharge Requirements for Order No. R1-2016-0001, National Pollutant Discharge Elimination System, NPDES No. CA0024449 (draft Permit) and accompanying draft Cease and Desist Order No. R1-2016-0012 (draft CDO) for the City of Eureka Elk River Wastewater Treatment Plant Facility (Facility)was April 4, 2016. The City of Eureka (City) provided timely comments. The City's comments are summarized and followed by staff responses in this document. Changes made to the draft Permit in response to public comment are reflected in staff responses in this document and in Proposed Order No. R1-2016-0001 for Board consideration (Proposed Permit). As reflected in staff responses in this document and in Order No. R1-2016-0012, for Board consideration (Proposed CDO), no changes were made to the Proposed CDO in response to public comment.

Appendix A.	City of Eureka NPDES Permit Comments, dated April 4, 2016.
Appendix A-1.	City of Eureka [Waste Discharge Requirements] WDR Comments 04.04.2016.xlsx.
Appendix A-2	WER for Copper (City of Eureka Final Report).doc
Appendix A-3	WER Appendix 1.pdf

City of Eureka Comments

Comment 1: *The City of Eureka (City) requests that 12.0 mgd be listed as peak dry weather treatment capacity in lieu of 8.6 mgd. The current limit of 8.6 mgd has been carried over from the original Elk River Wastewater Treatment Plant (WWTP) National Pollutant Discharge Elimination System (NPDES) permit; it reflects the original projected peak dry weather flow for the service area. However, there are no actual hydraulic or treatment limitations at the WWTP associated with this flowrate. The WWTP currently has a firm secondary treatment capacity of 12.0 mgd.*

Response 1: Hydraulic and treatment capacity limitations contained in the Proposed Permit are based upon the design specification submitted to the Regional Water Board for the Eureka Elk River Wastewater Treatment Plant and have been carried over from the previous permit. Although the Regional Water Board may consider an increase to the summertime peak flow rate of 8.6 million gallons per day (mgd) in the future, as with any permitted increase in mass emissions of pollutants, the action must first be supported by an antidegradation analysis conducted by the City and approved by the Regional Water Board in accordance with the Policy for Maintaining High Quality Water - Resolution 68-16.

No change has been made to the Proposed Permit in response to this comment.

Comment 2: *The City requests that the permit retain the peak hydraulic wet weather capacity of 32.0 mgd. The City understands that diversion of primary effluent around the secondary treatment process will eventually be phased out under the State Implementation Policy (SIP). The City plans to achieve full secondary treatment through process modifications for all flows reaching the WWTP and further will reduce the incoming flows through some combination of inflow and infiltration (I/I) reduction within the service area. In the interim, the City requests that the established hydraulic capacity of the WWTP be retained and continued diversion of primary effluent exceeding trickling filter capacity be allowed to continue.*

Response 2: The mass-based effluent limitations in the existing permit are based on the peak dry and wet weather treatment limits of the Facility (8.6 mgd and 12.0 mgd respectively). These mass-based effluent limitations are carried over to the Proposed Permit. While we understand that the hydraulic capacity for the Facility is 32 mgd, the discharge of pollutants associated with the Facility remains based upon the dry and wet weather peak treatment capacities of 8.6 mgd and 12 mgd. Any increase of pollutant discharge would require an antidegradation analysis to address addition of pollutant mass beyond the current permitted level. Reference to the hydraulic capacity of 32 mgd does not increase the allowable discharge of waste. Therefore, reference to the hydraulic capacity in the Proposed Permit may be confusing to the reader. No change has been made to the Proposed Permit in response to this comment. Temporary allowance for bypass of secondary treatment is already provided under the Proposed CDO.

Comment 3: *The City requests that plant flow limitations be influent based rather than effluent based and that the permit language is clear that hydraulic limits are based on the flow volume averaged over a 24-hour period.*

Response 3: Flow limitations are based upon flow through the Facility. Therefore effluent flow is the appropriate measure. Flow limitations shall continue to be based upon effluent measurements. As currently written, the monitoring location EFF-001 description is sufficiently flexible to allow flow measurement at the end of the disinfection process instead of at the end of the holding pond to accommodate batch (outgoing tide) discharge to Humboldt Bay.

In order to clarify application of flow limitations, staff made the following change to footnote 2 in Table E-4

> The Permittee shall report the ~~maximum daily and~~ average daily <u>and monthly</u> effluent flow rates.

Comment 4: *Item H, listed under Section III. Discharge Prohibitions, states that "The discharge of waste from the Facility to the Elk River and its tributaries, and to seasonal tidal marshes adjacent to the Facility is prohibited". Until such time that the City has considered all alternatives for compliance, the City requests that the language be modified to "The discharge of waste from the Facility to the Elk River and its tributaries, and to seasonal tidal marshes adjacent to the Facility is prohibited unless the discharge is done in such a manner as to*

enhance the beneficial uses associated with the seasonal and tidal marshes, including discharge of effluent, polished through the seasonal marshes, to Humboldt Bay".

Response 4: Discharge Prohibition III.H. states, "The discharge of waste from the Facility to the Elk River and its tributaries, and to seasonal and tidal marshes adjacent to the Facility is prohibited." This prohibition is retained from the previous permit, with a slight modification intended to avoid confusing the permitted use of the Overflow Marsh (a defined part of the Facility) with seasonal marshes adjacent to the Facility. The prohibition on discharges to the seasonal and tidal marshes does not in itself preclude future opportunities for the City to consider a marsh enhancement project to comply with the Enclosed Bays and Estuaries Policy and to mitigate for impacts associated with climate change and sea level rise. However, under current permitted conditions discharges to these areas remain prohibited. No changes will be made to the prohibition at this time. However, staff has added the following clarifying language to the section IV.A. of the Fact Sheet (Attachment F):

<u>This prohibition applies to the existing facility configuration and does not in itself preclude future enhancement options that may be considered for climate change resiliency and compliance with the Enclosed Bays and Estuaries Policy. In order for the Regional Water Board to consider a discharge that incorporated additional areas beyond the existing Facility for enhancement or mitigation, several criteria would need to be met including, but not limited to, an antidegradation analysis and any actions to secure all necessary permits from the Regional Water Board and other regulatory agencies for altered use of the existing wetlands.</u>

Comment 5: *As part of its efforts to plan for and conform to revised permits requirements, the City plans to consider alternative disinfection strategies that may eliminate its use of chlorine as a disinfectant. Within the CDO, the City requests reasonable time in which to study alternative disinfection methods and during which to budget for and implement any required monitoring changes. Prior to completing such studies, the City requests a minimum measurement sensitivity of 0.05 mg/L.*

Response 5: While the City is welcome to explore upgrades and alternatives to the existing disinfection process in concert with long term compliance alternatives, no additional time will be granted under the Proposed CDO specific to chlorine detection limitations. Should the City determine that existing continuous monitoring equipment is unreliable, the City may request in writing for a specified time Executive Officer approval to collect hourly grab samples during Facility operational hours for laboratory analysis. Upgrade of benchtop chlorine testing equipment can be accomplished with relative ease prior to the Proposed Permit going into effect. A comparison of currently available commercial amperometric systems shows lower detection levels are possible with the readily available instrumentation. One such example, the Hach Company's AutoCat 9000 amperometric titration methods report method detection limits for the total chlorine forward titration at 0.0012 mg/L (1.2 µg/L) Cl_2 and 0.0051 mg/L (5.1 µg/L) for the back titration and meet the testing requirements for measuring chlorine according to the Safe Drinking Water Act Regulations as well as NPDES compliance monitoring. This equipment is commercially available for less than $5,000. The requirement for a lower detection limit is an industry standard required of all surface water dischargers in the North Coast Region as permits are

renewed. Table note No. 4 in Attachment E Table E-4 of the Proposed Permit has been modified to provide flexibility, allowing the City to obtain Executive Officer approval for collection of hourly grab samples as an interim measure until new continuous monitoring could be reasonably installed.

Samples shall be collected at points immediately prior to dechlorination and immediately following dechlorination. All chlorine measurements shall be reported as total residual chlorine. The Permittee shall monitor total residual chlorine in the effluent continuously using a method with a reporting limit as low as technically feasible. Beginning February 1, 2017, benchtop measurements of effluent chlorine residual shall also be performed at least weekly using ~~the spectrophotometric DPD method 4500-CL G, or equivalent~~ equipment capable of achieving a detection limit of 1.2 µg/L as a routine check of daily monitoring results. Should the Permittee determine that existing continuous monitoring equipment is unreliable, the Permittee may request, in writing for a specified time, Executive officer approval to collect hourly grab samples during WWTP operational hours for laboratory analysis. Such an approval would serve as an interim measure until new continuous monitoring could be reasonably installed.

Comment 6: *The City requests that effluent ammonia limits be tied to a dilution allowance (See Item 10).*

Response 6: Based upon Regional Water Board staff's review of data, effluent concentrations reported for ammonia have exceeded the maximum daily effluent limitation of 10 mg/L only once since 2009 and average 2.8 mg/L for the same period. Based upon the data submitted by the City, it is unclear what actions other than attentive operation of the Facility would be necessary to achieve compliance with effluent limits for total ammonia. Any additional actions necessary for long term compliance with ammonia limitations should be considered and incorporated into the long term plans for Facility compliance. No change has been made to the Proposed Permit in response to this comment.

Comment 7: *The City requests that effluent copper limits be tied to a dilution allowance (See Item 10). Further, the City submits for review the attached Water Effects Ratio (WER) Study, which it requests be taken into consideration while evaluating the copper effluent limit.*

Response 7: The City submitted results of a copper water effects ratio study (WER) in conjunction with public comments and requested incorporation into the Proposed Permit. After review of the WER results submitted by the City and comparison to the U.S. EPA guidance for Streamlined Procedure EPA-822-R-01-005 for conducting and applying a streamlined copper WER, staff has determined that (1) The City conducted the WER in conformance with appropriate procedures, and (2) the appropriate WER for copper at this location is the effluent WER of 12.6 rather than the receiving water WER of 1.3 proposed by the City. Application of the effluent WER is most appropriate because U.S. EPA guidance for Streamlined Procedure EPA-822-R-01-005 indicates that the effluent and receiving water upstream samples are to be combined for copper toxicity testing at the dilution corresponding to the design low flow condition that the permitting authority uses in permit limit calculations. Effluent limit calculations for this Facility are based upon 100% effluent and a design low flow condition of 8.6 mgd. Application of the effluent WER for this Facility

is consistent with use of WERs for other site specific copper objectives incorporated into North Coast Region permits.

Application of a 12.6 WER results in an average monthly effluent limitation (AMEL) of 43.2 ug/L and a maximum daily effluent limitation (MDEL) of 61.3 ug/L. Of the 135 copper one time per month samples reported from 2009 through 2014, and evaluated for effluent limitation development, only four samples exceeded 43.2 ug/L (48 ug/L, 55 ug/L, 45 ug/L, 48 ug/L). Thus application of effluent limits using the effluent WER of 12.6 results in 97% compliance for the period of evaluation used to develop the Reasonable Potential Analyses (RPA) for this permit renewal. In addition, the City has the option to increase monitoring frequency to more than monthly to facilitate compliance with AMEL. Based upon a projected 97% compliance rate with proposed copper limitations, a mixing zone for copper is not necessary in the absence of additional justification. Accordingly, the Proposed Permit has been modified to reflect the following:

Attachment F section III.C.5. – State Implementation Policy

> Section 1.2 of the SIP allows the Regional Water Board to adjust the criteria/objective for metals with Permittee-specific Water Effect Ratios (WER) established in accordance with U.S. EPA guidance – Interim Guidance on Determination and Use of Water Effect Ratios for Metals (EPA-823-B-94-001) or Streamlined Water-Effect Ratio Procedure for Discharges of Copper (EPA-822-R-01-005) (Streamlined Procedure). The Streamlined Procedure determines site-specific values for a WER, a criteria adjustment factor accounting for the effect of site-specific water characteristics on pollutant bioavailability and toxicity to aquatic life.

Section IV.A.1 Final Effluent Limitations – Discharge Point 001, Table 4 Effluent Limitations

Parameter	**Units**	**Effluent Limitations[1]**				
		Average Monthly	**Average Weekly**	**Maximum Daily**	**Instantaneous Minimum**	**Instantaneous Maximum**
Copper, Total Recoverable	µg/L	~~3.4~~ 43.2	--	~~4.8~~ 61.3	--	--

Attachment F section IV.C 3.Determining the Need for WQBELs

> For copper, the RPA identified the U.S EPA saltwater criteria as most protective in Humboldt Bay. The U.S EPA saltwater criteria for copper is not hardness dependent. The Permittee ~~is conducting~~ conducted a WER study for copper. ~~Future~~ As a result the RPA~~s~~ for copper ~~will~~ has been conducted with the copper effluent WER of 12.6~~and actual receiving water hardness~~.

Attachment F section IV.C 3.Determining the Need for WQBELs, Table F-4. Summary of SIP RPA Results

CTR #	Pollutants	C or Most Stringent WQO/WQC (µg/L)	MEC or Minimum DL (µg/L)[1]	B or Minimum DL (µg/L)	RPA Result[2]
6	Copper, Total Recoverable	~~3.7~~ 47.1	55	3.1	Yes (Trigger 1)

Attachment F section IV.C.4 WQBEL Calculations, Table F-5 Determination of Long Term Averages

Pollutant	ECA		ECA Multiplier		LTA (µg/L)	
	Acute	Chronic	Acute	Chronic	Acute	Chronic
Copper, Total Recoverable	~~5.8~~ 72.9	~~3.7~~ 47.1	0.58	0.75	~~3.3~~ 42.1	~~2.8~~ 35.4

Attachment F section IV.C.4 WQBEL Calculations, Table F-6 Determination of Final WQBELs Based on Aquatic Life Criteria

Pollutant	LTA (µg/L)	MDEL Multiplier	AMEL Multiplier	MDEL (µg/L)	AMEL (µg/L)
Copper, Total Recoverable	~~2.8~~ 35.4	1.7	1.2	~~4.8~~ 61.3	~~3.4~~ 43.2

Attachment F section IV.C.4 WQBEL Calculations, Table F-8 Summary of Water Quality Based Effluent Limitations

Parameter	Units	Effluent Limitations				
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Copper, Total Recoverable	µg/L	~~3.4~~ 43.2	--	~~4.8~~ 61.3	--	--

Attachment F section IV.D.3.Stringency of Requirements for Individual Pollutants, Table F-10. Summary of Final Effluent Limitations

Parameter	Units	Effluent Limitations					Basis[1]
		Average Monthly	Average Weekly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum	
Copper, Total Recoverable	µg/L	~~3.4~~ 43.2	--	~~4.8~~ 61.3	--	--	CTR, SIP

Comment 8: *The City requests that effluent cyanide limits be tied to the dilution allowance (See Item 10). The City also requests consideration for alternative testing for cyanide to distinguish between free cyanide and strongly and weakly complexed cyanide by methods comparable to that achieved by the approved method in 40 CFR PART 136, as revised May 14, 1999. The City also requests that cyanide monitoring frequency be changed from monthly to quarterly. During the last permit cycle, only one sample returned positive (out of more than*

70). The City acknowledges its obligation to perform accelerated sampling if future results return positive, pursuant to Table E-4, note 6.

Response 8: Cyanide is often found to be a result of lab contamination. Cyanide was detected only three times in 121 samples (2.4%) evaluated for the RPA. The State Implementation Policy (SIP) requires mixing zones to be applied only when necessary. Staff finds that a mixing zone for three detections, which may be the result of lab error, is not warranted. Staff will evaluate alternative testing methods requested, once the City provides the method number and will incorporate any method or alternative method approved for use by U.S. EPA. Staff has no objection to sampling this constituent quarterly and has modified the monitoring and reporting program (Attachment E) to (1) reduce monitoring frequency for cyanide to quarterly, and (2) add flexibility to analytical techniques in the following manner:

Table E-1. Test Methods and Minimum Levels for Priority Pollutants

Table Notes:

1. The Permittee may propose alternative analytical methods for Executive Officer review and approval.

Table E-4. Effluent Monitoring

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method and (Minimum Level, units), respectively[1]
Cyanide, Total (as CN)	µg/L	24-hr Composite	~~Monthly[6]~~ Quarterly[6]	Color[7]

Comment 9: *Proposed [Draft] WDR set upper pH limit at pH = 8.5. Fact Sheet states pH limits will be 6 to 9 which is consistent with current permit. The City requests that the proposed pH limits be clarified.*

Response 9: Section 301(b) of the Clean Water Act and 40 C.F.R. part 122.44 require that permits include conditions meeting applicable technology-based requirements at a minimum, and any more stringent effluent limitations necessary to meet applicable water quality standards. Chapter 3, Table 3-1 of the Basin Plan includes water quality objective for pH for Humboldt Bay shall not be depressed below natural background levels nor raised above 8.5. The Order includes an instantaneous minimum effluent limitation for pH of 6.0 based on secondary treatment requirements at 40 C.F.R. part 133 (technology based requirements) and an instantaneous maximum effluent limitation for pH of 8.5 based on Chapter 3, Table 3-1 of the Basin Plan (water quality based requirements).

Comment 10: *As part of the Cease and Desist Order (CDO) and the new permit, the City requests that the Board consider granting a mixing zone and dilution credit for the following parameters: ammonia, copper, and cyanide. Further, the City requests that the aerial extent of the mixing zone be the distance required to achieve initial dilution at slack water. To validate the existing dilution allowance, the City proposes to update the dilution study done in 2008 using site specific information obtained as part of the 2012 Ebb Tide Discharge Study to validate 30/1 as the worst case condition. The City currently has the mixing zone study underway and intends to submit it for review prior to the Regional Water Board hearing where adoption of this permit will be considered.*

Response 10: When authorized, a mixing zone must be as small as practicable and cannot adversely impact beneficial uses. As indicated in Responses 6, 7, and 8 above, based upon Regional Water Board staff review of effluent data, a mixing zone is unnecessary to achieve compliance with the proposed effluent limitations for ammonia, copper, and cyanide. Should the Regional Water Board find that a mixing zone is warranted in the future, the City would need to submit a workplan for review and approval by the Executive Officer prior to initiating the study. This important step would ensure coordinated expectations between Regional Water Board staff and the City. No changes have been made to the Proposed Permit or Proposed CDO in response to this comment.

Comment 11 *– The City requests that it be allowed to monitor using equipment currently in place at the Chevron dock, accessed from the CeNCOOS website (http://www.cencoos.org/data/shore/humboldt). Further, the City requests the following:*

- Remove hardness, TDS, and electrical conductivity from required monitoring parameters
- Hardness in Humboldt Bay is generally above 6,000 mg/L
- TDS and electrical conductivity should be replaced by salinity, as it will give the same type of information
- Receiving waters are saline and not fit for a municipal drinking water source.

Response 11: Staff concurs with this request, given the weight of all the other actions being required of the City to comply with updated permit requirements. Additional Bay monitoring can be evaluated at a future date.

Attachment E – Monitoring and Reporting Program has been modified in the following manner:

Table E-2. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
--	RSW-001~~, RSW-002, etc~~.	CeNCOOS Humboldt Shore Station [1]

Table Notes:

1. The Humboldt shore station is located on the Chevron dock and is maintained by Humboldt State University. This station has been active since November 2012 and is the replacement system of the previous water quality station at Dock B. - Additional information related to the Humboldt Shore Station can be accessed at the following website. http://www.cencoos.org/data/shore/~~humboldtThe Permittee shall propose receiving water monitoring locations to the Regional Water Board for approval by the Executive Officer within 90 days of the adoption of this permit. The proposed receiving water locations shall be positioned to characterize receiving water quality~~. Should the Permittee choose to do so, it~~they~~ may propose and participate in group monitoring for the receiving water after receiving written approval from the Executive Officer.

Attachment E section VIII.A. Monitoring Locations RSW-001, RSW-002, etc.

The Permittee shall monitor Humboldt Bay at the CeNCOOS Shore Station Monitoring Location~~s~~ RSW-001 as follows:

Table E-5. Receiving Water Monitoring – Monitoring Location~~s~~ RSW-001~~, RSW-002, etc.~~

Parameter	Units	~~Sample~~ Reporting Type	Minimum Sampling Frequency
~~Hardness[2]~~Salinity	~~mg/L~~PSS[1]	~~Grab~~Median	Monthly
pH	s.u.	~~Grab~~Median	Monthly
Chlorophyll~~Electrical Conductivity @ 25°C~~	µg/~~Lmhos/cm~~	~~Grab~~Median	Monthly
Temperature	°C	~~Grab~~Median	Monthly
Turbidity~~Total Dissolved Solids (TDS)~~	NTU~~mg/L~~	~~Grab~~Median	Monthly
Dissolved Oxygen (Optical)	mg/L	Median	Monthly

Table Notes:

~~1. In accordance with the current edition of *Standard Methods for Examination of Water and Wastewater* (American Public Health Administration) or current test procedures specified in 40 C.F.R. part 136.~~

2. Practical Salinity Scale 1978 (PSS-78)~~Effluent and receiving water hardness samples shall be collected on the same day and at approximately the same time as effluent samples for copper~~.

Attachment F - Fact Sheet section VII.D. Receiving Water Monitoring has been modified in the following manner:

Receiving water monitoring requirements have been established in this Order to better characterize the receiving water. The Permittee ~~will~~ proposed receiving water monitoring using equipment currently in place at the Chevron dock, accessed from the CeNCOOS website (http://www.cencoos.org/data/shore/humboldt). Additional bay monitoring will be evaluated at a future date based upon data collected from this monitoring station and other information submitted during the term of this Order,.~~locations for two (2) receiving water monitoring locations within 90 days of the adoption of this permit that will accurately characterize the impact of the discharge on the receiving water for approval by the Executive Officer.~~ Should the Permittee choose to do so, and after they receive approval from the Executive Officer, ~~they~~ it may propose and participate in group monitoring of the receiving water with other Permittees who discharge ~~ing~~ to Humboldt Bay.

Comment 12 *– The City requests that the Regional Water Board take into consideration that many other factors (including other permitted discharges) contribute to water quality in Humboldt Bay. Hence, it should not be the City's burden to show that water conditions in violation of the order are NOT due to its discharge. Accordingly, the City requests that the*

sentence "The Regional Water Board may require an investigation to determine cause and culpability prior to asserting that a violation has occurred," be replaced with "The Regional Board shall perform an investigation to determine cause and culpability prior to asserting that a violation has occurred."

Response 12: Staff is sensitive to the City's concern regarding the potential requirement for the City to conduct an investigation associated with receiving water violation(s). Prior to any request that the City perform an investigation, the Regional Water Board staff would identify the nexus between discharges from the WWTP and a potential receiving water violation. Nevertheless, the responsibility to show compliance with permit requirements remains with the Permittee. No change will be made to the Proposed permit in response to this comment.

Comment 13: *The City requests that "septage" be defined as excrement and other waste material contained in or removed from septic tanks, portable toilets, or other similar sources.*

Response 13: Attachment A – Definitions of the Proposed Order has been modified to include the following:

> **Septage**
> Defined as the liquid or solid material removed from a septic tank, cesspool, portable toilet, type III marine sanitation device, recreational vehicle's sanitation tank, or similar storage or treatment works that receives domestic waste.

Comment 14: *The City requests that with this renewal and with review of subsequent studies, the Regional Water Board take into account the City's ability to finance any potential improvements. The City is currently preparing to undertake a water and wastewater rate study; the City's median household income (MHI) of $25,849 (according to the 2010 census) will need to be considered when setting rates.*

Response 14: Regional Water Board staff has already considered the general economic burden of requirements when recommending the Proposed CDO final compliance deadline 14 years from adoption of the Proposed Permit. As each project or portion of the project arises, the City is welcome to present specific economic factors for Regional Water Board staff consideration. In addition, the Clean Water State Revolving Fund (CWSRF) program offers low cost financing for a wide variety of wastewater treatment improvement projects. The program has significant financial assets, and is capable of financing projects from less than $1 million to over $100 million. More information related to the CWSRF can be accessed at http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf. For information and assistance on availability of funding for small and/or disadvantaged communities contact Jennifer Toney of the Division of Financial Assistance (DFA) at (916) 319-8246. More information on financial assistance programs can be found at http://www.waterboards.ca.gov/water_issues/programs/grants_loans/small_community_wastewater_grant/projects.shtml.