

4 May 2011; 2:23 pm

Comments from US EPA, Region IX, Elizabeth Sablad for City of Willows WWTP

Here are my comments/questions on the Willows WWTP permit:

1. The fact sheet is unclear regarding the applicable criteria for ammonia. I understand that there are seasonal limits and different limits based on the discharge point, but the source of the criteria used to develop WQBELs, discussed on pages F-22 through F-24, is unclear. Please further describe how both the acute and chronic criteria were calculated (considering pH and temperature), and why they are different for each discharge point and season. It would be helpful to include the criteria values within this section to further validate the RPA decision.
2. The fact sheet description of the discharge points is confusing. Specifically, the second paragraph on page F-4 states the facility was permitted to discharge to GCID and the monitoring data in the table on page F-5 only shows data from this discharge. However, this permit has two discharge points. Did the previous permit only cover discharges to the GCID? Is the discharge to Ag Drain C new?
3. For the TBEL discussion on pages F-11-12, tertiary requirements should be described as WQBELs, not TBELs, and this should be distinguished. In addition, the pH TBELs of 6.0 -9.0 are correct; however the TBEL summary table shows pH to be 6.5-8.5, which are the more stringent WQBELs. Basically, this section should describe the TBELs, and then describe how the WQBELs are applied because they are more stringent.
4. The chronic WET RP section on F-35 states there is no RP, but then goes on to say there is an effluent limit (there is not a limit in the permit). Please clarify. Also, it would be helpful to include the chronic WET testing results to justify the RPA decision.
5. The "pattern of toxicity" language, which RB5 agreed to change over a year ago is still in the template language for chronic WET testing. I will let Gayleen know this; however please change this in the permit (pages 24-25, F-36-37, and F-46).
6. Page 6 of the permit refers to the two discharge points as EFF-001 and EFF-002; however the MRP names them D-001 and D-002, with effluent monitoring to be conducted at EFF-001 only. Please clarify in the permit.

Feel free to call me if you have any questions.

Sincerely,  
Elizabeth

