Regional Water Quality Control Board
Central Valley Region
Board Meeting – 12-14 October 2011

Response to Written Comments for Tejon-Castac Water District,
Tejon Industrial Complex New East WWTF
Tentative Waste Discharge Requirements

At a public hearing scheduled for 12 to 14 October 2011, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) for Tejon-Castac Water District. This document contains responses to written comments received from interested parties regarding the Tentative WDRs (TWDRs) initially circulated on 26 April 2011. Written comments from interested parties were required by public notice to be received by the Central Valley Water Board by 27 May 2011 to receive full consideration. Comments were received by the California Department of Public Health (CDPH), and by Tejon-Castac Water District (District).

Written comments from the above interested party are summarized below, followed by the response of the Central Valley Water Board.

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH (CDPH) COMMENTS

On 13 May 2011, CDPH submitted comments regarding Ultraviolet (UV) Disinfection Specifications included in the TWDRs. Following discussions with the District, by letter 30 August 2011, CDPH submitted revised comments to supersede Comments Nos. 2 through 15 of the 13 May 2011 Letter.

13 May 2011 CDPH Letter – COMMENT No. 1: The CDPH letter recommends to correct Provision H.16.a, from 0.02 NTU to 0.2 NTU.

RESPONSE: The change has been made as recommended.

30 August 2011 CDPH Letter – COMMENT No. 2: The CDPH letter recommends replacing UV Disinfection System Specifications C.1.

RESPONSE: Specification C.1 has been replaced to read:

> "The Discharger shall provide continuous, reliable monitoring of flow, UV intensity, UV dose, and turbidity"

30 August 2011 CDPH Letter – COMMENT No. 3: The CDPH letter recommends replacing UV Disinfection System Specification C.2

RESPONSE: Specification C.2 has been replaced to read:

> "The Discharger shall operate the UV disinfection system to provide a minimum UV dose of 82 millijoules per square

centimeter (mJ/cm^2) at all times. UV dose equations approved by CDPH must be used as part of the automatic UV disinfection control system for calculating UV dose."

30 August 2011 CDPH Letter – COMMENT No. 4: The CDPH letter recommends replacing UV Disinfection System Specification C.3

RESPONSE: Specification C.3 has been replaced to read:

"The equation to be used as part of the automatic UV disinfection control system for calculating UV does shall be the following:

$$RED_{calc} = 10^{[2.2414 - 0.7663 \times \log(Q) + 0.5534 \times \log(0.636 \times S)]}$$

Where:

S = Measured UV sensor value (mW/cm^2)
RED = RED calculated with the UV dose-monitoring equation (mJ/cm^2)
Q = Flow rate (gallons per minute [gpm])"

30 August 2011 CDPH Letter – COMMENT No. 5: The CDPH letter recommends that UV Disinfection System Specification C.9 be replaced to read:

"The facility should be operated in accordance with an approved operations plan, which specifies clearly the operational limits and responses required for critical alarms. The operations plan should be submitted and approved by CDPH. The operations plan is part of the Engineering Report, Appendix G, which shall become and enforceable part of the permit. A copy of the approved operations plan should be maintained at the treatment plant and be readily available to operations personnel and regulatory agencies."

RESPONSE: Specification C.9 has been replaced as recommended but modified to read:

The facility shall be operated in accordance with an approved operations plan, which specifies clearly the operational limits and responses required for critical alarms. The operations plan shall be submitted and approved by CDPH. The operations plan is part of the Engineering Report, Appendix G, which shall become and enforceable part of the permit. A

copy of the approved operations plan shall be maintained at the treatment plant and be readily available to operations personnel and regulatory agencies.

30 August 2011 CDPH Letter – COMMENT No. 6: The CDPH letter recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.10.

"A quick reference plant operations data sheet should be posted at the treatment plant and include the following information:

a. The alarm set points for tertiary turbidity, high flow, and UV dose.
b. The values of high turbidity, high flow, and low UV dose, when flow must be diverted to waste.
c. The required frequency of calibration for all monitoring equipment measuring turbidity, flow, and UV intensity.
d. The required frequency of mechanical cleaning/wiping and equipment inspection.
e. The UV lamp age tracking procedures and replacement intervals."

RESPONSE: The Specification has been included in the TWDRs and modified to read as follows:

A quick reference plant operations data sheet shall be posted at the treatment plant and include the following information:

a. The alarm set points for tertiary turbidity, high flow, and UV dose.
b. The values of high turbidity, high flow, and low UV dose, when flow must be diverted to waste.
c. The required frequency of calibration for all monitoring equipment measuring turbidity, flow, and UV intensity.
d. The required frequency of mechanical cleaning/wiping and equipment inspection.
e. The UV lamp age tracking procedures and replacement intervals."

30 August 2011 CDPH Letter – COMMENT No. 7: The CDPH recommends that the following language be added as UV Disinfection System Specification C.11.

> "The UV system must be operated with a built-in automatic reliability feature that must be triggered when the system is below the target UV dose. Conditions that should divert flow include: inability to meet the minimum UV dose, intensity sensor failure, multiple lamp failure, or reactor failure."

RESPONSE: The Specification has been added to the TWDRs and modified to read:

> The UV system must be operated with a built-in automatic reliability feature that must be triggered when the system is below the target UV dose. Conditions that shall divert flow include: inability to meet the minimum UV dose, intensity sensor failure, multiple lamp failure, or reactor failure.

30 August 2011 CDPH Letter – COMMENT No. 8: The CDPH letter recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.12.

> "There shall be no bypassing of untreated or partially treated wastewater from the plant or any intermediate unit processes to the point of use."

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter– COMMENT No. 9: The CDPH letter recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.13.

> "Any discharge of untreated or partially treated wastewater to the use area, and the cessation of same, shall be reported immediately by telephone to the RWQCB, CDPH, and the local health officer."

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter – COMMENT No. 10: The CDPH letter recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.14.

> "The plant shall be provided with a sufficient number of qualified personnel to operate the filtration and disinfection facility effectively so as to achieve the required level of treatment at all times. The number and type of operational personnel should be described in

the operations plan that is part of the Engineering Report, Appendix G, which shall become an enforceable part of the permit."

RESPONSE: The Specification has been added to the TWDRs and modified to read:

The plant shall be provided with a sufficient number of qualified personnel to operate the filtration and disinfection facility effectively so as to achieve the required level of treatment at all times. The number and type of operational personnel shall be described in the operations plan that is part of the Engineering Report, Appendix G, which shall become an enforceable part of the permit.

30 August 2011 CDPH Letter – COMMENT No. 11: The CDPH recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.15.

"A preventive maintenance program shall be provided to ensure that all equipment is kept in a reliable operating condition. A preventative maintenance program is a required part of the Engineering Report operations plan, Appendix G, which shall become an enforceable part of the permit"

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter – COMMENT No. 12: The CDPH recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.16.

"UV intensity sensors and flow meters must be properly calibrated to ensure proper disinfection."

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter – COMMENT No. 13: The CDPH recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.17.

"The plant shall have a minimum of one reference UV intensity sensor on site at all times. Measurements made by each duty UV intensity sensor shall be checked at least monthly using a reference UV intensity sensor. For all UV intensity sensors in use, the ratio of the duty UV sensor intensity to the reference UV sensor intensity

> must be less than or equal to 1.2. If the calibration ratio is greater than 1.2, the failed duty UV sensor must be replaced by a properly calibrated sensor and recalibrated by a qualified facility. The reference UV intensity sensors shall be recalibrated at least annually by a qualified facility using a National Institute of Standards and Technology (NIST) traceable standards."

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter – COMMENT No. 14: The CDPH recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.18.

> "Flow meters measuring the flow through a UV reactor must be verified to determine accuracy at least monthly via checking the flow reading against other flow determination methods."

RESPONSE: The Specification has been added as recommended.

30 August 2011 CDPH Letter – COMMENT No. 15: The CDPH recommends that the following language be added to the TWDRs as UV Disinfection System Specification C.19.

> "Equivalent or substitutions of equipment are not acceptable without an adequate demonstration of equivalent disinfection performance."

RESPONSE: The Specification has been added as recommended.

TEJON-CASTAC WATER DISTRICT (DISTRICT) COMMENTS

The District submitted a cover letter and a strikeout track changes version of the order dated 27 May 2011. The cover letter discusses concerns the District has with the TWDRs. The strikeout track changes version has specific changes the District requests be included in the TWDRs.

DISTRICT LETTER – COMMENT No. 1: The District posits that the incremental increase EC limit of 500 µmhos/cm on page IV-11 in the *Water Quality Control Plan for the Tulare Lake Basin, Second Edition, revised February 2004,* (Basin Plan) does not apply within the White Wolf subarea and should be removed from the TWDRs along with related Findings, Provisions,

Monitoring, and Information Sheet analysis. Rather, the District letter indicates only the 2,000 µmhos/cm EC limit on the same page of the Basin Plan should be included in the TWDRs.

RESPONSE: The changes have not been made. Basin Plan page I-2 acknowledges that salts accumulate in the Tulare Lake Basin (Basin) due to importation and evaporative use of water. It also acknowledges that the paramount water quality problem in the Basin is the accumulation of salts. On page I-3, the Basin Plan notes that **all** discharges must be managed to reduce salt contributions. On page IV-5, the Basin Plan states:

> Degradation of ground water in the Tulare Lake Basin by salts is unavoidable without a plan for removing salts from the Basin. A valleywide drain to carry salts out of the valley remains the best technical solution to the water quality problems of the Tulare Lake Basin. The drain would carry wastewater generated by municipal, industrial, and agricultural activities, high in salt and unfit for reuse. **The only other solution is to manage the rate of degradation by minimizing the salt loads to the ground water body. [Emphasis added]**
>
> Salts that are not indigenous to the Basin water resources result from man's activity. Salts come from imported water, soil leached by irrigation, animal wastes, fertilizers and other soil amendments, municipal use, industrial wastewaters, and oil field wastewaters. These salt sources, all contributors to salinity increases, should be managed to the extent practicable to reduce the rate of ground water degradation.

The above illustrates that the biggest problem in the Basin is the accumulation of salts and the resulting degradation of groundwater. The Basin Plan acknowledges that sources of salt, especially those associated with anthropogenic activities, need to be controlled to the extent practicable until a method of removal from the Basin is established. To this end, Basin Plan pages IV-10 through IV-11 explicitly describe requirements for **all** municipal and domestic wastewater discharges to land. On page IV-10, the Basin Plan describes levels of treatment required for all domestic wastewater facilities with land disposal. The description is continued on page IV-11, where the Basin Plan states:

> Additional effluent limits follow:
>
> • The incremental increase in salts from use and treatment must be controlled to the extent possible. The maximum EC shall not exceed the EC of the source water plus 500 micromhos/cm. When the source water is from more than one source, the EC shall be a weighted average of all sources.
>
> • Concentration of total coliform organisms in reclaimed wastewater must be in accordance with limits established in the following provisions of Title 22, California Code of Regulations (CCR): Sections 60303 (Spray Irrigation of Food Crops), 60305 (Surface Irrigation of Food Crops), 60311 (Pasture for Milking Animals), 60313 (Landscape Irrigation), 60315 (Nonrestricted Recreational Impoundment), 60317 (Restricted Recreational Impoundment), and 60319 (Landscape Impoundment).
>
> • In the Poso Creek Subarea, discharges shall not exceed 1,000 micromhos/cm EC, 200 mg/l chlorides, and 1.0 mg/l boron. The Poso Creek subarea consists of about 35,000 acres of

land between State Highways 99 and 65 about six miles north of Bakersfield, and is defined more specifically in Regional Water Board Resolution No. 71-122, which is incorporated by reference into this plan.

• In the White Wolf Subarea, for areas overlying Class I irrigation water, discharges shall not exceed 1,000 µmhos/cm EC, 175 mg/l chlorides; 60 percent sodium, and 1.0 mg/l boron. For areas overlying Class II or poorer irrigation water, discharges shall not exceed 2,000 µmhos/cm EC, 350 mg/l chlorides, 75 percent sodium, and 2 mg/l boron. In areas where ground water would be Class I except for the concentration of a specific constituent, only that constituent will be allowed to exceed the specified limits for Class I water. In no case shall any constituent be greater than those limits specified for areas overlying Class II irrigation water. The White Wolf subarea consists of 64,000 acres within the valley floor, at the southern tip of the Tulare Lake Basin, about 20 miles south of Bakersfield. The subarea is bounded on the west by the San Emigdio Mountains, on the south and east by the Tehachapi Mountains, and on the north by the White Wolf Fault.

Criteria for mineral quality of irrigation water is described below:

Constituent	Class I	Class II	Class III
TDS (mg/l)	<700	700 - 2,000	>2,000
EC (µmhos/cm)	<1,000	1,000 - 3,000	>3,000
Chlorides (mg/l)	<175	175 - 350	>350
Sodium (percent base constituents)	<60	60 - 75	>75
Boron (mg/l)	<0.5	0.5 – 2	>2

• Discharges to areas that may recharge to good quality ground waters shall not exceed an EC of 1,000 micromhos per centimeter, a chloride content of 175 mg/l, or a boron content of 1.0 mg/l.

The limits include the incremental EC effluent limit of source water plus 500 µmhos/cm, coliform limits for a range of uses; specific EC, chloride, and boron effluent limit caps for the Poso Creek Subarea; specific EC, chloride, sodium, and boron effluent limit caps for the White Wolf Subareas; and specific EC, chloride, and boron effluent limit caps for discharges to areas overlying “good quality” groundwater.

As described in the limit itself, the incremental increase EC limit is a limit on use, or in other words the reasonable amount of salt that should be allowed through municipal and domestic use of water. It is intended to ensure that municipal and domestic dischargers manage the increase in effluent EC to the extent practicable.

The EC limits for the Poso Creek Subarea, the White Wolf Subarea, and areas in the Basin overlying “good quality” groundwater represent caps on the EC of discharges to those areas. They are intended to maximize the use of available water resources in a water short basin while minimizing groundwater degradation and protecting historic groundwater uses.

The incremental increase limit and the caps are distinct and separate limits intended to achieve separate goals: (1) to maximize salt reduction, and (2) to protect the

groundwater resource, respectively. Choosing one limit in lieu of the other is inconsistent with the language and intent of the Basin Plan. The Basin Plan says "Additional effluent limits follow:" It does not say pick between the incremental EC limit and one of the caps. To make such a selection would be nonsensical. For example, suppose one had a discharge overlying "good quality" groundwater with an EC of 150 µmhos/cm. If one were to choose the cap of 1,000 µmhos/cm lieu of the incremental limit, as suggested by the District, the resulting WDRs would authorize a discharge with an effluent EC exceeding that of underlying groundwater by 850 µmhos/cm instead of 500 µmhos/cm. This would not be protective of underlying groundwater, could result in exceedences of applicable water quality objectives, and would be inconsistent with the Basin Plan's mandate to control the incremental increase in salt to the extent practicable.

Both the incremental increase effluent EC limit of source water plus 500 µmhos/cm and the EC cap of 2,000 µmhos/cm apply to the discharge at the Tejon Industrial Complex New East WWTF and are included in the TWDRs.

DISTRICT LETTER – COMMENT No. 2: Page three of the District's letter states that "…it does not legally or logically follow that the District should be required to meet a lower EC than that of the White Wolf…when the source is non-basin water." The District is referring to the TWDR requirement to comply with the incremental increase effluent EC limit of source water plus 500 µmhos/cm and the EC cap of 2,000 µmhos/cm for discharges within the White Wolf subarea when source water is imported surface water instead of poorer quality groundwater.

RESPONSE: Additional discussion has been added to the TWDRs information sheet, but no other changes have been made to the TWDRs in response to the comment. In describing the need for salinity management and effluent limits, the Basin Plan does not distinguish between source water supply. Logically, if the goal is to reduce the increase in effluent EC by controlling salts to the extent practicable, then the source water supply is irrelevant; regardless of its quality the goal would be to reduce the incremental increase in EC prior to discharge.

DISTRICT LETTER – COMMENT No. 3: The District states that if the TWDRs are adopted with both an incremental increase EC limit of source water plus 500 µmhos/cm and an EC cap limit of 2,000 µmhos/cm it "…may abandon its current program as the cost benefit analysis of the program may no longer support it." Presumably, the District is referring to its importation of surface water supplies for municipal and domestic drinking water supply.

RESPONSE: The District provides water supply and sanitation services to the businesses within the District. Groundwater depth is at 500 to 900 feet below ground surface. The

District has provided no cost benefit analysis comparing the costs and benefits of treating imported State Project water for local municipal and domestic uses with the costs associated with pumping local, poorer quality groundwater for the same uses. Should the District perform such an analysis, among other considerations, it would need to include as a cost to the people of the State, the accelerated degradation of groundwater due to the switch in sources from State Project water to local groundwater.

For the New East WWTF, the District also has not provided the Board with a description of pretreatment requirements, source control measures, or other salinity management measures that it has implemented to address the Basin Plan's mandate to reduce the incremental increase in discharge EC to the extent practicable. The District has provided no evidence that it cannot comply with the incremental EC limit. The District has submitted a Salinity Management Plan dated February 2009 for the West WWTF, as required by WDRs Order No. R5-2008-0004. The Salinity Management Plan indicates that the District implemented in 2005 its surface water delivery project because the generally poor quality of its source water wells, and particularly the hardness, limited some of the uses of its customers. The Plan also notes that the District's pretreatment ordinance limits the salinity of discharges to the West WWTF collection system to source water EC plus 500 µmhos/cm. The Plan indicates that the District also generally prohibits the installation of self-regenerating water softeners within the District; the Plan notes the District can make exceptions to this rule.

The Plan does not provide evidence demonstrating that the District samples discharges to its collection system for EC or, if or how, the District has enforced its own local limit for EC. Presumably, if discharges to the system comply, then the WWTF effluent should comply with the Basin Plan incremental EC limit. The Plan does not provide evidence that the District inspects its users for water softener installations or if it finds businesses with unapproved water softeners, requires their removal. The Plan also does not indicate if the District has implemented any other salinity management or source control measures (e.g., educating its users about the conversion of caustic cleaning chemicals to lower salinity alternatives, the conversion of powdered detergents to lower salinity liquid detergents, etc.)

The District has not provided any evidence that it has exhaustively pursued source control salinity minimization measures for those discharging to its WWTFs. More importantly, it has not demonstrated it cannot meet the incremental EC limit mandated by the Basin Plan. To the contrary, its own ordinance imposes the same limit on discharges to its collection system for the West WWTF.

DISTRICT STRIKEOUT VERSION – COMMENT No. 1: The District's letter requests that the facility description on Finding 8 of the TWDRs be modified to say aerated sludge tanks instead of sludge aeration tank.

RESPONSE: The change has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 2: The District's letter requests modification to Finding 21 of the TWDRs to state that CDPH has approved the District's "Interim Water Recycling Disinfection Plan", allowing the discharge of wastewater prior to the completion of the Title 22 Engineering Report and UV validations.

RESPONSE: The change has not been made. The District submitted the "Interim Water Recycling Disinfection Plan" dated February 2010 to CDPH proposing to disinfect via chlorination until its UV unit meets the validation requirements of CDPH. CDPH reviewed the "Interim Water Recycling Disinfection Plan" and provided comments by letter dated 16 June 2010. According to Comment No. 20 of the 16 June 2010 letter, the "Interim Water Recycling Disinfection Plan" was reviewed and approved until the new UV units are installed, approved, and operational. The 16 June 2010 letter, requires the District to update its Title 22 Engineering Report addressing comments provided CDPH.

On 14 June 2011, CDPH staff inspected the Tejon Industrial Complex New East WWTF and indicated it is satisfied with the level of treatment and quality of the discharge and has conditionally approved the discharge. On 15 June 2011, Central Valley Water Board staff emailed the District notifying it there was no objection to the initiation of the proposed interim discharge, as the District has met the minimum requirements of the California Water Code section 13264.

The District submitted a report entitled "UV Disinfection System Field Commissioning Test" to CDPH for the validation of their UV system. By email of 17 August 2011, CDPH approved the validation of the Districts UV system. However, the Title 22 Engineering Report is still incomplete.

The District is required to submit an approval letter from CDPH to the Central Valley Water Board after the Title 22 Engineering Report has met all of CDPH's requirements and is considered complete.

DISTRICT STRIKEOUT VERSION – COMMENT No. 3: The District's letter requests to entirely remove the language in Finding 43.a and b and replace with the following:

> "a. White Wolf Subarea overlying Class I irrigation water (groundwater) – discharges shall not exceed 1,000 µmhos/cm EC, 175 mg/L chlorides, 60 percent sodium, and 1.0 mg/L boron.

b. White Wolf Subarea overlying Class II or poorer irrigation water (groundwater) – discharges shall not exceed 2,000 µmhos/cm EC, 350 mg/L chlorides, 75 percent sodium, and 2 mg/L boron.

c. All other areas in the Tulare Lake Basin – discharges shall not exceed an EC level of source water plus 500 µmhos/cm."

RESPONSE: The change has not been made. See response to District Letter – Comment No. 1.

DISTRICT STRIKEOUT VERSION – COMMENT No. 4: The District's letter requests to entirely remove Finding 44 of the TWDRs and replace with the following:

"The White Wolf Subarea consists of 64,000 acres within the Tulare Lake Basin about 20 miles south of Bakersfield. The subarea is bounded on the west by the San Emidio Mountains, on the south and east by the Tehachapi Mountains, and on the north by the White Wolf Fault.

The subject discharge will take place in the White Wolf Subarea. Based on the quality from the discharger's backup source water well, underlying groundwater is considered Class II for EC discharge limits. EC limits for this discharge will be as required for White Wolf Subareas overlying Class II groundwater."

RESPONSE: The change has not been made. See response to District Letter – Comment No. 1.

DISTRICT STRIKEOUT VERSION – COMMENT No. 5: The District's letter request to modify Finding 47.a. to read that the effluent salinity limit of source water plus 500 µmhos/cm excludes discharges in the White Wolf Subarea.

RESPONSE: The change has not been made. See response to District Letter – Comment No. 1.

DISTRICT STRIKEOUT VERSION – COMMENT No. 6: The District's letter requests to remove the language in Finding 49.g that includes source water monitoring.

RESPONSE: The change has not been made. Source water monitoring is necessary to determine compliance with the incremental effluent EC limit of source water plus 500 µmhos/cm. Source water EC monitoring shall be the calculated flow-weighted average if more than one source is used.

DISTRICT STRIKEOUT VERSION – COMMENT No. 7: The District's letter requests the following language be added to Effluent Limitation B.2 of the TWDRs "…when using native sources…" to read that the 12-month rolling average EC limit of source water plus 500 µmhos/cm will only apply to the discharge when the District obtains its source water from its supply wells.

RESPONSE: The change has not been made. See response to District Letter – Comment No. 2.

DISTRICT STRIKEOUT VERSION – COMMENT No. 8: The District's letter requests the following language be added to Effluent Limitation B.3 of the TWDRs "…when using non-native source…" to read that the monthly average EC limit of 2,000 µmhos/cm only applies to the discharge when the District utilizes surface water as its source water.

RESPONSE: The change has not been made. See response to District Letter – Comment No. 2.

DISTRICT STRIKEOUT VERSION – COMMENT No. 9: The District's letter requests to remove the reference to "UV Transmittance" from UV Disinfection System Specifications C.1.

RESPONSE: The change has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 10: The District's letter requests to revise the UV dose in UV Disinfection System Specifications C.2 from 80 millijoules per square centimeter (mJ/cm^2) to 100 mJ/cm^2 along with the reference to the California Department of Public Health from DPH to CDPH.

RESPONSE: The correct UV dose for the UV disinfection system at the WWTF is 82 mJ/cm^2 according to CDPH by letter dated 30 August 2011. The change has been made accordingly.

DISTRICT STRIKEOUT VERSION – COMMENT No. 11: Via email dated 14 June 2011, the District requested the removal of UV Disinfection System Specifications C.3. According to the Districts email the WWTF does not monitor for UV transmittance.

RESPONSE: The change has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 12: The District's letter requests to revise the reference to the California Department of Public Health from DPH to CDPH in UV Disinfection System Specification C.7.

RESPONSE: The change has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 13: The District's letter requests to change UV Disinfection System Specification C.8 to read as follows:

> "Prior to initial discharge to the use area, the discharger shall submit to the Executive Officer a copy of the letter from CDPH stating that all the UV disinfection system pre-operation acceptance conditions specified by CDPH have been satisfied for approval to implement in the 'Interim Water Recycling Disinfection Plan' has been granted."

RESPONSE: The change has not been made. UV Disinfection Specifications in the TWDRs are requirements set forth by CDPH based on its evaluation of the discharge.

DISTRICT STRIKEOUT VERSION – COMMENT No. 14: The District's letter requests to remove the word "warning" from Recycling Specification E.3.

RESPONSE: Title 22, section 60310 of the CCR requires areas where recycled waste is used and accessible to the public to post signs notifying the public not to drink the water for it can pose a potential health risk . These signs are considered warning signs and the change to Recycling Specification E.3. has not been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 15: The District's letter requests to revise the California Department of Public Health from DPH to CDPH referenced in Recycling Specification E.11, and Provisions H.13.

RESPONSE: The change has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 16: The District's letter requests to correct Provision H.16.a to read 0.2 NTU instead of 0.02 NTU.

RESPONSE: The change to Provision H.16.a has been made.

DISTRICT STRIKEOUT VERSION – COMMENT No. 17: The District's letter requests to change Provision H.19 to read as following:

> "The Discharger shall submit a Title 22 Engineering Report in accordance with CCR Title 22 Section 60323. The Discharger shall not recycle its effluent until CDPH has approved the Discharger's Title 22 Engineering Report or reuse in accordance with the "Interim Recycling Disinfection Plan" and a copy of the approval letter from CDPH is provided to the Central Valley Water Board."

RESPONSE: No change has been made to Provision H.19. See response to District Strikeout Version – Comment No. 2.

DISTRICT STRIKEOUT VERSION – COMMENT No. 18: The District's letter requests to entirely remove Provision H.21 which includes a Salinity Minimization compliance schedule.

RESPONSE: The change has not been made. The discharge will not immediately comply with the incremental effluent EC limit of source water plus 500 µmhos/cm and a time schedule requiring the District to implement salinity minimization measures is included in the TWDRs to ensure compliance with the limit.

DISTRICT STRIKEOUT VERSION – COMMENT No. 19: The District's letter requests to entirely remove Provision H.22. According to the letter Provision H.22 contradicts Finding 46.a of the TWDRs.

RESPONSE: No change has been made. Provision H.22 [H.23] simply explicitly acknowledges the Central Valley Water Board right to reopen the Waste Discharge Requirements should it determine it to be necessary.

DISTRICT STRIKEOUT VERSION – COMMENT No. 20: The District's letter requests to entirely remove the source water monitoring and reporting sections from the Monitoring and Reporting Program of the TWDRs.

RESPONSE: The change has not been made. See response to District Strikeout Version – Comment No. 6.

DISTRICT STRIKEOUT VERSION – COMMENT No. 21: The District's letter requests to include the following language "…or landscaping planted…" to Use Area Reporting No. 1 of the Monitoring and Reporting Program.

RESPONSE: The change has not been made. Title 22, CCR, section 60301 defines Use Area as "an area of recycled water use with defined boundaries…" The language in Use Area Reporting No.1 of the Monitoring and Reporting Program refers to all Use Areas included in the District's Title 22 Engineering Report and approved by CDPH.