

**Central Valley Regional Water Quality Control Board
Board Meeting – 3/4 October 2013**

**Response to Written Comments for
Sacramento Regional County Sanitation District
Sacramento Regional Wastewater Treatment Plant
Proposed Amendment of NPDES Permit and Time Schedule Order**

At a public hearing scheduled for 3/4 October 2013, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of an amendment to Waste Discharge Requirements Order R5-2010-0114-01 (NPDES permit) and Time Schedule Order (TSO) R5-2010-0115-01 for the Sacramento Regional Wastewater Treatment Plant. A tentative amendment to the NPDES permit and TSO were issued on 12 July 2013. This document contains Central Valley Water Board staff responses to written comments received from interested persons.

Written comments on the proposed Order were required to be received by the Central Valley Water Board by 14 August 2013 in order to receive full consideration. In addition to comments from the Sacramento Regional County Sanitation District (SRCSD), comments were received by the United States Environmental Protection Agency (USEPA), California Sport fishing Protection Alliance (CSPA), California Urban Water Agencies (CUWA), and the Water Agencies¹.

Written comments are summarized below, followed by Central Valley Water Board staff responses.

Sacramento Regional County Sanitation District (SRCSD)

SRCSD Comment #1: Page 17, footnote 1. The Sacramento Superior Court's stay orders have not affected the compliance dates for the chlorine residual effluent limits; thus the deadline for compliance with the chlorine residual effluent limits should not be changed.

Response: Central Valley Water Board staff concurs and the deadline for chlorine residual remains as stated in the original permit.

SRCSD Comment #2. Pages 34 and 35, Sections VI.C7a. and b. compliance time schedules for Title 22 and ammonia, the SRCSD recommends the following language:

<u>Title 22</u>	
Progress Reports	9 July 2014, annually <u>thereafter</u> , after approval of work plan until final compliance
<u>Ammonia</u>	
Progress Reports	<u>13</u> July 2014 , annually, after approval of work plan until final compliance

¹ The "Water Agencies" include the following; Alameda County Water District, Alameda County Flood Control and Water Conservation District, Zone7, Contra Costa Water District, Kern County Water Agency, Metropolitan Water District of Southern California, San Luis & Delta-Mendota Water Authority, Santa Clara Valley Water District, State Water Contractors and Westlands Water District.

Response: Central Valley Water Board staff concurs with some of the SRCSD's language. The Water Agencies also commented on these time schedules. Additionally Central Valley Water Board staff requires an Operations Plan for the initiation of operation of the nitrification and denitrification facilities. See Attachment 1 for changes.

SRCSD Comment #3. Page E-14, Table E-6B, Footnote 4 was deleted. It should be reinserted.

Response: Central Valley Water Board staff agrees. See Attachment 1 for changes.

SRCSD Comment #4. Page E-21, Table E-9, correct the table to be consistent with SRCSD Comment #2.

Response: Central Valley Water Board staff agrees. See Attachment 1 for changes.

SRCSD Comment #5. Pages F-63 and 64 Items, vi. (c) Chlorodibromomethane and vii. (c) Dichlorobromomethane, Remove the phrase, "and the potential need for further adjustment based on full scale implementation".

Response: Central Valley Water Board staff concurs. This phrase is not needed at this time. However, once the upgraded wastewater treatment plant is operational, actual chlorodibromomethane and dichlorobromomethane monitoring results will be used to determine reasonable potential and calculate the effluent limits. See Attachment 1 for changes.

California Sportfishing Protection Alliance (CSPA)

Designated Party Status Request: CSPA requested designated party status for the Central Valley Water Board hearing scheduled for 3/4 October 2013 with regard to the proposed Order amending the NPDES permit and TSO for the Sacramento Regional Wastewater Treatment Plant. The commenter will be granted designated party status for the subject hearing.

CSPA Comment #1. The Proposed Permit contains Compliance Schedules beyond those allowed by the Basin Plan and contrary to California Water Code Section 13377, which only allows compliance schedules for up to 10 years.

Response: Central Valley Water Board staff does not concur. The final compliance dates were modified based on several court decisions by the Sacramento County Superior Court. The compliance schedules are still only 10 years from the effective date of the permit requirements, because the Court orders stayed the effective dates of the requirements in the NPDES permit. A table is provided in Attachment 2 of this Response to Comments that explains the actions taken to stay the effective date of the permit requirements.

CSPA Comment #2. CSPA contends the removal of an effluent limitation for N-nitrodimethylamine (NDMA) is contrary to the antibacksliding requirements of the Clean Water Act and Code of Federal Regulations 40 CFR 122.44 (l)(1). The service area includes Aerojet Corporation and two closed military bases all of which used rocket fuel that may contain NDMA. The use of rocket fuel supports that reasonable potential exists for NDMA.

Response: Central Valley Water Board staff does not concur. The proposed removal of the effluent limits for NDMA meets the antibacksliding exception of Clean Water Act (CWA) section 402(o)(2). Specifically, CWA section 402(o)(2)(B)(i) allows a renewed, reissued, or modified permit to contain a less stringent effluent limitation for a pollutant if information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance. The proposed removal of the NDMA effluent limitations is based on new information regarding laboratory reporting levels for analyses of NDMA.

In establishing water quality-based effluent limits for NDMA in the existing permit, the reasonable potential analysis (RPA) was conducted using data that was understood at the time to be reliable data. The data was analyzed using EPA method 521, a laboratory analysis method for use with drinking or source water only, not treated wastewater. The reporting level for the EPA method 521 analysis is 2 ng/L.

The SRCSD, as required by Time Schedule Order R5-2010-0115-01, submitted a progress report on 12 November 2012 titled, "Annual Compliance Workplan and Pollution Prevention Plan Progress Report of NDMA." The progress report provided a summary of findings on the "Study to Identify Most Appropriate Method for Ultra Low Level NDMA Testing." As part of the study, the SRCSD contacted 13 laboratories to identify the ability to perform analyses at a reporting level of 2 ng/L. Only six labs stated they could perform the analysis with these ultra-low reporting levels. These laboratories were sent standardized blind and blank samples for analysis. The results of the blind test using EPA methods 607M/1625B modified, 521, 1625M, 625M, semi-volatiles by ion-trap GCMS and 521 by GCMS showed highly varied results including detections in blanks. Based on this data, the SRCSD concluded and the Central Valley Water Board staff concurs, the data originally used for the RPA that was based on ultra-low reporting levels is too variable and is unreliable for consideration in the RPA. Consequently, the proposed amendment modifies the RPA findings in the permit in accordance with the section 1.3 of the SIP², and removes the water quality-based effluent limits for NDMA. The new information provided by the SRCSD's study satisfies the exception to backsliding in CWA section 402(o)(2)(B)(i).

CSPA Comment #4. The proposed permit relaxes effluent limitations for Chlorodibromomethane (CDBM) and Dichlorobromomethane (DCBM) contrary to the Antidegradation Policy (Resolution 68-16) and the Basin Plan Requirements for Mixing Zones. CSPA also contends that the Central Valley Water Board in Order R5-2010-0114-01 found that disinfection by ultraviolet (UV) light was best practicable treatment or control (BPTC) for the SRCSD's discharge. Additionally, CSPA states that the permit only considers impacts to drinking water use and does not address impacts to people eating fish from waters within the mixing zone.

Response: Central Valley Water Board staff does not concur. Order R5-2010-004-01 allows a human health dilution credit of 56:1 and a mixing zone extending approximately three miles downstream of the discharge. Rather than allow the use of the entire assimilative capacity of the Sacramento River, the permit includes performance-based

² State Water Resources Control Board, Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (State Implementation Plan or SIP)

effluent limits for CDBM and DCBM, based on existing Facility performance. The more stringent effluent limits use only a small portion of the assimilative capacity in the Sacramento River.

The permit also includes new effluent limitations for ammonia and nitrate, which requires modification and replacement of existing treatment facilities to nitrify and denitrify to remove nitrogen. One result of the removal of ammonia is that with the continued use of chlorine as the disinfectant, the disinfection process will change from a chloramination process to a free chlorination process. Free chlorination generates higher concentrations of disinfection byproducts, including CDBM and DCBM. The SRCSD constructed a pilot treatment plant to identify treatment processes to meet the new requirements in Order R5-2010-0114-01. The results from the pilot plant confirmed increased concentrations of CDBM and DCBM after ammonia removal. The proposed amendment allows the effluent limits for CDBM and DCBM to increase after the SRCSD upgrades the Facility. The table below shows the existing CDBM and DCBM effluent limits, the effluent limits if the entire assimilative capacity was granted and the proposed revised effluent limits. As shown below, although the effluent limits increase, the limits still do not use the entire assimilative capacity of the river.

Constituent	Existing Limits	Full Dilution Credits – Limits (full assimilative capacity used)	Proposed Limits
Chlorodibromomethane µg/L	1.1 AMEL 2.2 MDEL	12 AMEL 25 MDEL	6 AMEL 12 MDEL
Dilution Ratio	4:1	56:1	24:1
Dichlorobromomethane µg/L	2 AMEL 3.4 MDEL	27 AMEL 47 MDEL	17 AMEL 35 MDEL
Dilution Ratio	4:1	56:1	40:1

AMEL = average monthly effluent limit
 MDEL = maximum daily effluent limit

In addition to nitrogen removal requirements, the permit requires the SRCSD to provide California Code of Regulations Title 22, or equivalent, disinfection. The SRCSD reviewed several alternatives for disinfection and removal of CDBM and DCBM which include membrane filtration with short contact time chlorination, bromide removal, dissolved organic carbon removal, chloramination, activated carbon adsorption, chlorination with gas, chlorination with liquid chlorine and pre-ozonation and UV disinfection. The alternatives were reduced to chlorination, gas or liquid, and pre-ozonation with UV. The financial costs and associated environmental and energy impacts are illustrated in the table below. Based on the financial costs, the energy and air quality impacts, and availability of assimilative capacity in the Sacramento River, the SRCSD chose disinfection with liquid chlorine.

Costs and Impacts of alternatives for disinfection

Disinfection	Capital Cost (\$M)	O&M Costs (\$M)	Annual Energy Use (kWh)	Annual CO ₂ Emissions (metric tons)	CO ₂ Equivalent Vehicles (#)
Chlorine Gas	92.5	5.2	1,307,000	922	192
Liquid Chlorine¹	98.2	5.5	163,000	115	24
Pre-Ozonation + UV	319.1	10.5	34,385,000	24,260	5,054

¹ Selected cost-effective alternative

CSPA contends that the continued use of chlorine disinfection does not meet State Water Resources Control Board Resolution 68-16 (Antidegradation Policy), because the permit does not require the implementation of best practicable treatment or control (BPTC). Central Valley Water Board staff does not concur. CSPA states that the Central Valley Water Board made a finding in the permit that UV disinfection is considered BPTC. This is an incorrect statement. In the permit Fact Sheet, page F-94 it states, "...BPTC for this facility includes implementation of nitrification, denitrification, and the equivalent of Title 22 filtration with ultraviolet light, ozone or chlorine disinfection treatment."

Furthermore, the SRCSD submitted a memorandum dated 31 May 2013 regarding an Antidegradation Analysis in Consideration of Increased Effluent Limits for CDBM and DCBM. The memorandum followed the guidance provided by the State Water Board in APU 90-004 for a "complete" anti-degradation analysis and evaluated if changes in Sacramento River water quality resulting from the use of chlorine disinfection after ammonia and nitrate removal were added to the Facility would be consistent with maximum benefit to the people of the State, not unreasonably affect actual or potential beneficial uses, and not cause water quality less than water quality objectives established to protect existing in-stream beneficial uses. For both CDBM and DCBM, the increased performance based limits are within available assimilative capacity of the Sacramento River and will not adversely impact beneficial uses of the river. In addition, considering economic and environmental impacts of the disinfection alternatives, Central Valley Water Board staff agrees with the determination in the SRCSD's antidegradation analysis that the use of chlorine disinfection is appropriate and the proposed amendment will result in the implementation of best practicable treatment or control consistent with maximum benefit to people of the state.

CSPA also contends that ingestion of fish from within the mixing zone may be harmful to humans and was not considered by the Central Valley Water Board. Central Valley Water Board staff does not concur. For CDBM and DCBM, the California Toxic Rule (CTR) contains human health criteria for the consumption of water and fish, and less stringent criteria for the consumption of fish only. Since municipal and domestic water supply is a beneficial use of the receiving water, the more stringent CTR criteria for the consumption of water and fish were used to evaluate the appropriate water quality-based effluent limits for CDBM and DCBM. The less stringent CTR criteria for consumption of fish only were also considered to evaluate impacts to people consuming fish caught in and around the mixing zone. This is not an issue for this discharge, because the effluent limits for CDBM and DCBM are more stringent than the CTR human health criteria for consumption of fish only. The permit, therefore, requires the discharge to be compliant with the CTR human health criteria for fish consumption only at the end of pipe, without dilution.

California Urban Water Agencies (CUWA)

CUWA Comment #1. CUWA requests the constituent dissolved organic carbon be added to routine monitoring of the Effluent and Receiving Water Characterization Study. Dissolved organic carbon is a key constituent that is modeled in Delta water and a key drinking water constituent in wastewater.

Response: Central Valley Water Board staff concurs. Dissolved organic carbon has been added to the Effluent and Receiving Water Characterization Study and will be monitored once a month every other year.

CUWA Comment #2. CUWA requests phosphorus monitored under the Effluent and Receiving Water Characterization Study be specified as total phosphorus. Total phosphorus is also a key constituent that is modeled in Delta water and a key drinking water constituent in wastewater.

Response: Central Valley Water Board staff concurs. Currently the SRCSD monitors phosphorus in the orthophosphate form as part of the standard minerals monitoring. Total phosphorus monitoring has been added to the Effluent and Receiving Water Characterization Study and will be monitored once a month every other year.

Water Agencies –Alameda County Water District, Alameda County Flood Control and Water Conservation District, Zone7, Contra Costa Water District, Kern County Water Agency, Metropolitan Water District of Southern California, San Luis & Delta-Mendota Water Authority, Santa Clara Valley Water District, State Water Contractors and Westland Water District

Water Agencies Comment #1. The Water Agencies request revisions to due dates for progress reports regarding Title 22 Disinfection requirements (p.34) and Ammonia Effluent Limitations (p.35)

Response: Central Valley Water Board staff concurs. See response to SRCSD Comment #2.

Water Agencies Comment #2. The Water Agencies request clarification and changes of the effective date for final effluent limitations for total residual Chlorine (p.14, fn. 1; p. 17, fn. 1)

Response: Central Valley Water Board staff concurs. See response to SRCSD Comment #1.

United States Environmental Protection Agency (USEPA)

USEPA Comment #1. USEPA supports the proposed amendments to the permit and TSO.

Response: Comment noted and appreciated.

Attachment 1 to Response to Comments

CHANGES TO ATTACHMENT 1 BASED ON COMMENTS RECEIVED (CHANGES HIGHLIGHTED IN YELLOW)

Location	Change
Limitations and Discharge Requirements, Page 15, section IV.A.1.f.	<p style="text-align: center;">f. Total Residual Chlorine¹. Effluent total residual chlorine shall not exceed:</p> <ul style="list-style-type: none"> i. 0.011 mg/L, as a 4-day average; and ii. 0.019 mg/L, as a 1-hour average. <p>¹ This Order includes interim effluent limitations for total residual chlorine and total coliform organisms (section IV.A.2.). Effective immediately, the interim effluent limitations for these constituents shall apply in lieu of final effluent limitations. The final effluent limitations for total residual chlorine are effective 1 December 2020, and Effluent limitations for total coliform organisms become effective when the Discharger complies with Special Provisions section VI.C.7 or 4 December 2020 9 May 2023, whichever is sooner.</p>
Limitations and Discharge Requirements, Page 17, section IV.A.2.b.	<p>b. Total Residual Chlorine¹. Effective immediately and ending on 30 November 2020, the effluent total residual chlorine shall not exceed:</p> <ul style="list-style-type: none"> i. 0.011 mg/L, as a monthly average; and ii. 0.018 mg/L, as a daily average. <p>¹ The final effluent limitations for total residual chlorine become effective when the Discharger complies with Special Provisions section VI.C.7. or 1 December 2020, whichever is sooner.</p>

Location	Change	
Limitations and Discharge Requirements, Pages 34, Sections VI.C.7a, Title 22	<u>Task</u>	<u>Date Due</u>
	i. Submit Method of Compliance Workplan/Schedule	Within 6 months after adoption of this Order
	ii. Progress Reports ¹	1 February 9 July 2014 , annually thereafter , after approval of work plan until final compliance
	iii. Begin CEQA process for Compliance Project	Within 4 years after Adoption Date of this Order 16 May 2017
	iv. Begin construction of Compliance Project	Within 7 years after Adoption Date of this Order 16 May 2020
	v. Full Compliance	1 December 2020 9 May 2023

Location	Change	
Limitations and Discharge Requirements, Pages 35, Sections VI.C.7b, Ammonia	<u>Task</u>	<u>Date Due</u>
	i. Submit Method of Compliance Workplan/Schedule	Within 6 months after adoption of this Order
	ii. Submit and Implement Pollution Prevention Plan (PPP) ¹ for ammonia	Within 1 year after adoption of this Order
	iii. Progress Reports ²	1 February 9 July 2014 13 July 2014 , annually thereafter , after approval of work plan until final compliance
	iv. Begin CEQA process for Compliance Project	Within 4 years after Adoption Date of this Order 19 May 2015
	v. Begin construction of Compliance Project	Within 7 years after Adoption Date of this Order 19 May 2018
	vi. <u>Submit Operations Plan: The plan shall include the date for initiation of operation of the nitrification facilities, which will establish the date when the effluent limits for dichlorobromomethane and chlorodibromomethane increase.</u> ³	<u>No later than 30 days prior to the first day of discharge that includes effluent from the ammonia and nitrate removal wastewater treatment system.</u>
	vii. Full Compliance	1 December 2020 11 May 2021
¹ The PPP shall be prepared and implemented in accordance with CWC section 13263.3(d)(3) as outlined in the Fact Sheet (Attachment F section VII.B.7.b). The PPP shall include an evaluation of methods for reducing effluent ammonia concentrations through treatment process optimization, eliminating high ammonia side streams, etc.		
² The progress reports shall detail what steps have been implemented towards achieving compliance with waste discharge requirements, including studies, construction progress, evaluation of measures implemented, and recommendations for additional measures as necessary to achieve full compliance by the final compliance date.		
³ <u>The Operation Plan shall be prepared and implemented in accordance with CWC section 13385 (j)(1)(D)(i)(I). The Operations Plan must describe the actions the discharger will take during the period of adjusting and testing, including steps to prevent violations and identifies the shortest reasonable time required for the period of adjusting and testing, not to exceed 90 days for a wastewater treatment unit that relies on a biological treatment process.</u>		

Location	Change		
Attachment E, Monitoring and Reporting Program, Page E-14, Table E-6B, fn 4	<p>⁴ Pyrethroids to include bifenthrin, cyfluthrin, cypermethrin, esfenvalerate, lambda-cyhalothrin and permethrin."</p>		
Attachment E, Monitoring and Reporting Program, Attachment E, Monitoring and Reporting Program, Page E-21, Table E-9	<p>Special Provision</p>	<p>Reporting Requirements</p>	
	<p>Pollution Prevention Plan for mercury Annual Report (Section VI.C.3.a)</p>	<p>1 February, annually, after approval of updated pollution prevention plan</p>	
	<p>Title 22 Disinfection Requirements (Section VI.C.7.a)</p>	<p>1 February 9 July 2014, annually thereafter, until final compliance</p>	
	<p>Salinity Evaluation and Minimization Plan Annual Report (Section VI.C.3.b)</p>	<p>1 February, annually, after approval of plan</p>	
	<p>Compliance Schedules for Final Effluent Limitations for ammonia, compliance with final effluent limitations. (Section VI.C.7.b)</p>	<p>1 February 13 July 2014, annually thereafter, until final compliance</p>	

Location	Change
Chlorodibromomethane, Fact Sheet, Page F-63	<p>(a)WQBELs. The receiving water contains assimilative capacity for chlorodibromomethane, therefore, a dilution credit of 56:1 was allowed in the development of the WQBELs for chlorodibromomethane. Based on the allowable dilution credit, an AMEL of 12 µg/L and a MDEL of 25 µg/L is calculated. The Central Valley Water Board finds that granting of this dilution credit could allocate an unnecessarily large portion of the receiving water's assimilation capacity of chlorodibromomethane and could violate the Antidegradation Policy. For this reason, a performance-based effluent limitation <u>for the current pure-oxygen treatment facility</u> is calculated (See Table F-19. Performance-based Effluent Limitations Statistics). <u>When the treatment facilities are upgraded to provide ammonia and nitrate removal, it is expected that the effluent will contain increased concentrations of chlorodibromomethane. Based on data collected from the Discharger's pilot test of small-scale new treatment facilities and including a 40% process scale-up factor to take into consideration uncertainties and variability and the potential need for further adjustment based on full scale implementation,</u> an additional performance-based effluent limitation is calculated that will apply when the discharge includes effluent from the ammonia and nitrate removal wastewater system. This Order contains a maximum daily effluent limitation (MDEL) for chlorodibromomethane of 2.2 µg/L <u>from the pure oxygen treatment facility, and a maximum daily effluent limitation (MDEL) for Chlorodibromomethane of 12 µg/L that is applicable commencing the first day of discharge that includes effluent from the ammonia and nitrate removal wastewater treatment system.</u></p>

Location	Change
<p>Dichlorobromomethane, Fact Sheet, Page F-64</p>	<p>(a)WQBELs. The receiving water contains assimilative capacity for dichlorobromomethane, therefore, a dilution credit of 56:1 was allowed in the development of the WQBELs for dichlorobromomethane. Based on the allowable dilution credit, an AMEL of 27 µg/L and a MDEL of 47 µg/L is calculated. The Central Valley Water Board finds that granting of this dilution credit could allocate an unnecessarily large portion of the receiving water's assimilation capacity of dichlorobromomethane and could violate the Antidegradation Policy. For this reason, a performance-based effluent limitation <u>for the current pure-oxygen treatment system</u> is calculated (See Table F-19. Performance-based Effluent Limitations Statistics). <u>When the treatment facilities are upgraded to provide ammonia and nitrate removal, it is expected that the effluent will contain increased concentrations of dichlorobromomethane. Based on data collected from the Discharger's pilot test of small-scale new treatment facilities and including a 40% process scale-up factor to take into consideration uncertainties and variability and the potential need for further adjustment based on full scale implementation,</u> an additional performance-based effluent limitation is calculated that will apply when the discharge includes effluent from the ammonia and nitrate removal wastewater treatment system. The performance-based effluent MDEL is 3.4 µg/L from the pure oxygen treatment facility, and the maximum daily effluent limitation (MDEL) for dichlorobromomethane is 35 µg/L that is applicable commencing the first day of discharge that includes effluent from the ammonia and nitrate removal wastewater treatment system. Using the performance-based limit for the MDEL provides protection of the drinking water beneficial use and meets the antidegradation policy of no increase in concentration of dichlorobromomethane discharged by the Facility. This Order contains a final MDEL for dichlorobromomethane of 3.4 µg/L.</p>

Attachment 2 to Response to Comments

**SRCS D Effective Dates and Compliance Deadlines
 Under 2010 NPDES Permit, Court Stays and Settlement Stipulation**

Permit Requirement	2010 NPDES Permit Effective Date/Deadline	1/23/12 Court Stay Effective Date/Deadline	7/13/12 Court Stay Effective Date/Deadline	12/4/12 State Water Board Order	5/6/13 Settlement Stipulation Effective Date/Deadline
Biochemical Oxygen Demand Final Effluent Limitation	Dec. 1, 2020 (pp. 13-14, Table 6, n. 2)	May 10, 2021 (160-day stay, from 1/23/12 to 7/1/12)	Oct. 19, 2021 (322-day stay, from 1/23/12 to 12/10/12)	N/A	May 9, 2023 (889-day stay, from 1/23/12 to 6/30/14)
Total Suspended Solids Final Effluent Limitation	Dec. 1, 2020 (pp. 13-14, Table 6, n. 2)	May 10, 2021 (160-day stay, from 1/23/12 to 7/1/12)	Oct. 19, 2021 (322-day stay, from 1/23/12 to 12/10/12)	N/A	May 9, 2023 (889-day stay, from 1/23/12 to 6/30/14)
Total Coliform Organisms Effluent Limitation	Dec. 1, 2020 (p. 15, n. 1; p. 16, n. 2)	May 10, 2021 (160-day stay, from 1/23/12 to 7/1/12)	Oct. 19, 2021 (322-day stay, from 1/23/12 to 12/10/12)	N/A	May 9, 2023 (889-day stay, from 1/23/12 to 6/30/14)
Turbidity Effluent Specifications	Dec. 1, 2020 (p. 30)	May 10, 2021 (160-day stay, from 1/23/12 to 7/1/12)	Oct. 19, 2021 (322-day stay, from 1/23/12 to 12/10/12)	N/A	May 9, 2023 (889-day stay, from 1/23/12 to 6/30/14)
Tertiary Filtration (Title 22 Disinfection) Requirement	Dec. 1, 2020 (p. 33)	May 10, 2021 (160-day stay, from 1/23/12 to 7/1/12)	Oct. 19, 2021 (322-day stay, from 1/23/12 to 12/10/12)	N/A	May 9, 2023 (889-day stay, from 1/23/12 to 6/30/14)
Ammonia Nitrogen Final Effluent Limitation (Effective Date)	Dec. 1, 2020 (pp. 13-14, Table 6, n. 2)	N/A	May 11, 2021 (161-day stay, from 7/2/12 to 12/10/12)	N/A	May 11, 2021 (unchanged from 7/13/12 Court Stay)