



July 1, 2015

Matt St. John, Executive Officer
North Coast Regional Water Quality Control Board (NCRWQCB)
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

**RE: CITY OF SANTA ROSA SUBREGIONAL WATER RECLAMATION SYSTEM
NPDES Permit No. CA0022764; WDID No. 1B83099OSON, Order # R1-2013-0001**

Subject: 2015 Total Phosphorus Effluent Limitation Compliance Report

Dear Mr. St. John:

This report documents compliance with Final Effluent Limit IV.A.2.b.i (no net loading of total phosphorus) as required Compliance Determination VII.N specified in Order R1-2013-0001, which specifies the following:

- The Permittee will be determined to be in compliance with the effluent limitation in IV.A.2.b.i if the total phosphorus controlled for the previous three years is greater than or equal to the three-year average of total phosphorus discharged; and
- The Permittee shall document compliance with the effluent limitations in an annual report, submitted to the Regional Water Board by July 1st of each year.

In addition, Attachment B of Order No. R1-2013-0048 specifies that “[t]he first compliance determination will occur in 2017, after conclusion of the 2016-2017 discharge season, using a three-year average from the 2014-2015 discharge season through the 2016-2017 discharge season.”

This report revises a reporting framework that will be updated by July 1st each year but does not yet evaluate compliance as the report submitted in 2017 will be the first such compliance determination.

Table 1 summarizes credits approved by NCRWQCB for three projects. Credits for the Beretta project were approved by NCRWQCB on September 20, 2012 based on the City’s June 5, 2012 proposal. Credits for the Pepperwood project were approved by RWQCB on October 18, 2012 based on the City’s June 28, 2012 proposal. Credits for the Ocean View project were approved by RWQCB on April 29, 2015 based on the City’s February 5, 2015 proposal.

Table 1 also describes the credits that have been earned as validated by the Sonoma Resource Conservation District as documented in a separate report for each project (see Attachments 1 through 3).

Table 1. Earned Phosphorus Annual Credit Summary (pounds)

	Approved ¹				Validated ²				3-Year Cumulative Total
	Beretta	Pepper-wood	Ocean View	Total	Beretta	Pepper-wood	Ocean View	Total	
2013	294	526		820	0	543		543	--
2014	485	526	5836	6847	294	543	5483	6320	--
2015	442	526	5836	6804					6863
2016	399	526	5836	6761					6320
2017	399	341	5836	6576					0
2018	399	341		740					0

¹ Approved by NCRWQCB based on City's proposal

² Validation is based on third party inspection. Validated credits are used to determine compliance. Validation reports can be found in attachments to this report.

Table 2 summarizes discharge of phosphorus. No discharge occurred in the 2013-2014 or 2014-2015 discharge seasons (i.e., October 1 – May 14).

Table 2. Total Phosphorus Discharged To Laguna de Santa Rosa (pounds)

Discharge Period	Annual Discharge Volume (MG)	Annual Average Total P ¹ (mg/l)	Annual TP Discharged (pounds)	3-Yr Cumulative Total P Discharged (pounds)
2013-2014	0	2.7	0	--
2014-2015	0	3.6	0	--
2015-2016				0
2016-2017				0

¹ as measured in Delta Pond during discharge season in 2013-2014 and in plant effluent in 2014-2015

Table 3 compares the validated credits from Table 1 to the discharged quantity of Total Phosphorus from Table 2. Compliance will be determined first in 2017 and annually thereafter using the three-year comparison of validated credits and discharged phosphorus per Attachment B of Order No. R1-2013-0048.

**Table 3. Total Phosphorus Effluent Limitation
Compliance Summary**

Discharge Period	3-Yr Cumulative Total P Credits Earned ¹	3-Yr Cumulative Discharged Total P ²	Balance ³
2013-2014	0	--	--
2014-2015	0	--	--
2015-2016	6863	0	6863
2016-2017	6320	0	6320
¹ From Table 1. Credits earned in a calendar year are applied to the following discharge season. For example, credits earned in 2014 are applied to the 2014-2015 discharge season.			
² From Table 2.			
³ 2017 is the first year of compliance determination. Positive value <i>Balance</i> column denotes compliance and negative value indicates non-compliance.			

Should you have any questions or require additional information, please contact Rita Miller, Deputy Director of Environmental Services at (707) 543-3879.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



David M. Guhin

Director of Santa Rosa Water

Attachments

1. Credit Verification and Annual Monitoring and Reporting for Beretta Dairy Nutrient Reduction Project – Letter From Sonoma Resource Conservation District dated June 25, 2015.
2. Credit Verification and Annual Monitoring and Reporting for Nunes-Ocean View Nutrient Reduction Project – Letter From Gold Ridge Resource Conservation District dated June 11, 2015.

3. Credit Verification and Annual Monitoring and Reporting for Pepperwood Preserve Sediment Reduction Project – Letter From Sonoma Resource Conservation District dated June 22, 2015