RESPONSE TO COMMENTS

PROPOSED ORDER NO. R3-2020-0020

GENERAL WASTE DISCHARGE REQUIREMENTS
FOR
DISCHARGES FROM DOMESTIC WASTEWATER SYSTEMS
WITH FLOWS GREATER THAN 100,000 GALLONS PER DAY

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) provided an opportunity for the public to review and submit written comments on the June 19, 2020 draft General Waste Discharge Requirements Order No. R3-2020-0020 for *Discharges from Domestic Wastewater Systems with Flows Greater than 100,000 Gallons Per Day* in the Central Coast Region (referred to as draft General Permit). This document describes the public input process and contains Central Coast Water Board staff's responses to the written comments received on the draft General Permit during the public comment period. Staff considered all comments received during the public input process to prepare the proposed General Permit.

Early Outreach

Prior to circulating the draft General Permit for public comment, Central Coast Water Board staff provided an early opportunity for Wastewater System operators and other interested persons to provide input on the process to ensure a thorough review. Staff held three early outreach meetings to share information on the draft General Permit and to solicit input.

1. January 31, 2020 – at the Central Coast Water Board January board meeting, staff presented a strategy for the regulation of large wastewater treatment plant discharges to land.
2. February 12, 2020 – staff held an introductory meeting to solicit input for the development of a *General Order for Discharges from Domestic Wastewater Treatment Systems with Flows Greater than 100,000 gallons per day in the Central Coast Region*.
3. June 10, 2020 – staff presented information on the draft General Permit to the Sanitation Agencies Managers Association.

Central Coast Water Board staff did not develop written responses to comments from these early outreach meetings, however comments and questions received were used by staff to develop the draft General Permit.

Outreach During the Public Comment Period

Central Coast Water Board staff released the draft General Permit for a 30-day public comment period starting on June 19, 2020 and ending on July 20, 2020. During the comment period, staff held four public outreach meetings (on June 25, June 30, July 8, and July 15, 2020) using the Zoom platform to facilitate interested persons' review of the draft General Permit. Staff presented key components of the draft General Permit and answered questions. Staff also offered to all participants the opportunity to have individual meetings to discuss the draft General Permit and how it may relate to their specific Wastewater System[1]. Staff met with several entities individually to discuss specific details of the draft General Permit and their systems.

A copy of the public notice, draft General Permit, and recordings of the outreach meetings during the public comment period are available on the Central Coast Water Board's website[2].

Response to Written Comments

Written comments were received during the public comment period from the following eight interested entities.

- City of Guadalupe
- City of Santa Maria
- Mission Hills Community Services District
- California American Water
- Cambria Community Services District
- Wallace Group
- Cypress Ridge Limited Partnership
- City of Greenfield

Responses to these comments are provided below. For reference, a redline strikeout version of the draft General Permit to show the changes that were made in response to the comments received can be found here:

https://www.waterboards.ca.gov/centralcoast/board_decisions/tentative_orders/

[1] Wastewater System - Refers to the collection system, treatment equipment, pumping stations, treatment ponds, biological treatment systems, chemical treatment systems, clarifiers, sand/media filters, disinfection systems, recycled water systems (including distribution systems), storage ponds, land application areas, disposal ponds, and other systems associated with the collection, treatment, storage, and disposal of wastewater.

[2] https://www.waterboards.ca.gov/centralcoast/board_decisions/tentative_orders/

The comments included herein are direct transcriptions from the comment letters received but they do not include non-substantive content from the comment letter (e.g., salutations and contact information)[3]

City of Guadalupe – Comment 1

Including the requirements for monitoring phenol, formaldehyde, and zinc, such as in Tables 4C, 5B, and 6B of the Monitoring and Reporting Program (MRP), are expensive and unnecessary, regardless of the waste streams contributing to the plant. First, formaldehyde is never mentioned in the Central Coast Basin Plan and is therefore not a constituent of concern to receiving water quality. Item 12 on page 7 of the draft general permit indicates that these "harmful chemicals can kill the bacteria in the wastewater system and cause wastewater to be inadequately treated." Therefore, these constituents need not be explicitly monitored, as adequately treated wastewater by default must not contain harmful concentrations of these chemicals. Tables 4C, 5B, and 6B all indicate a sampling frequency of at least monthly for these constituents. At a cost of $80 per phenol test, $300 per formaldehyde test, and $22 per zinc test, annual sampling for these three constituents is at least $4,824. It is recommended that these requirements be removed completely.

Staff Response to City of Guadalupe– Comment 1

The General Monitoring and Reporting Program is an example template covering multiple treatment and disposal scenarios and it will be updated and tailored to each individual Discharger's Wastewater System based on the information provided in the Discharger's application to enroll in the General Permit (e.g., monitoring requirements that are not relevant will be removed).

For some Wastewater Systems, effluent monitoring requirements for phenol, formaldehyde, and zinc will ensure the best practicable treatment or control is effective and confirm that water quality will be maintained at a level that is protective of beneficial uses. Central Coast Water Board staff will work with the Discharger at the time of enrollment to determine the need and frequency of monitoring for these select constituents.

As described in section III.C of the General Monitoring and Reporting Program, effluent monitoring for these select constituents will only be required if the Wastewater System receives raw wastewater containing significant amounts of fats, oil, grease, phenol, formaldehyde, or zinc. Types of waste streams that could contribute fats, oil, grease, phenol, formaldehyde, or zinc to a Wastewater System might include flows from oil pressing/bottling, meat processing, holding tanks (e.g., recreational vehicles, portable toilets, airplane wastewater), etc. The proposed General Permit indicates that owners and/or operators that accept wastes that contain these chemicals must ensure that such

[3] A couple of minor spelling typos were corrected in the transcriptions. Additional text inserted by Central Coast Water Board staff into the comment letter text to provide context (e.g., definition of acronyms) is shown in brackets "[ ]".

wastes do not deleteriously affect the Wastewater System and adversely affect beneficial uses of groundwater (draft General Permit section IV.A.9 [now renumbered in the proposed General Permit as section IV.A.8]).

The Basin Plan does not explicitly identify groundwater limitations for formaldehyde; however, the State Water Resources Control Board (State Water Board), Division of Drinking Water, has established a drinking water notification level for formaldehyde. Notification Levels are health-based advisory levels established for chemicals in drinking water that lack maximum contaminant levels (MCLs). As presented in the proposed General Permit, and in accordance with the Antidegradation Policy[4], an activity that produces a waste and discharges to existing high quality waters will be required to meet waste discharge requirements that will result in the best practicable treatment or control of the discharge necessary to ensure pollution or nuisance will not occur, and the highest water quality consistent with the maximum benefit of the people of the state be maintained.

The Central Coast Water Board has analytical data demonstrating the presence of formaldehyde in treated domestic wastewater and groundwater underlying some permitted wastewater treatment facilities. Recently adopted Senate Bill No. 317 goes into effect in 2022 and this Senate Bill prohibits the use of a nonbiodegradable toxic chemical in a chemical toilet, recreational vehicle, or waste facility of a vessel and prohibits the sale of a nonbiodegradable toxic chemical in a container that indicates that the chemical could be used in a chemical toilet, a waste facility of a recreational vehicle, or a waste facility of a vessel.

Change Made to the General Permit: None

City of Guadalupe – Comment 2

Section II of the MRP, Water Supply Monitoring, should also be removed completely. Many wastewater agencies do not have ready access to water supply sources before use, and therefore have significant challenges in gathering and analyzing these constituents. Alternatively, the MRP allows dischargers to submit “the well identification number and the reporting year’s consumer confidence report… provided, at a minimum, all the required constituents are sampled at the frequency specified in Table 2,” which is annual for all constituents listed. However, §64449 of the drinking water regulations requires groundwater well monitoring only every three years for water quality constituents having a secondary maximum contaminant level, including total dissolved solids, chloride, sodium, sulfate, carbonate, bicarbonate, calcium, and magnesium, all but three of the constituents on this table. Not even a municipal water supplier is required to sample these constituents at the frequency required in this draft permit.

[4] State Water Resources Control Board Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality of Waters in California.

Staff Response to City of Guadalupe – Comment 2

The General Monitoring and Reporting Program is an example template covering multiple treatment and disposal scenarios and it will be tailored to each individual Discharger's Wastewater System based on the information provided in the Discharger's application to enroll in the proposed General Permit.

Water supply monitoring, as stated in the General Monitoring and Reporting Program, requires the Discharger to sample raw water supply (sample water before use or treatment). This information will be used as a baseline to track loading (e.g., salt loading) as the water moves through the community and into the Wastewater System for treatment and disposal. Water supply analytical data should be used to assist in the development and implementation of source control activities or the identification of a new water supply source. As presented in the proposed General Permit, and in accordance with the Antidegradation Policy, an activity that produces a waste and discharges to existing high quality waters will be required to meet waste discharge requirements that will result in the best practicable treatment or control of the discharge necessary to ensure pollution or nuisance will not occur, and the highest water quality consistent with the maximum benefit of the people of the state be maintained. An evaluation and comparison of water supply, influent, and effluent monitoring data will assist the Discharger in source loading identification and aid in the development of an implementable plan to improve water quality discharged to land.

Central Coast Water Board staff understand access and control to sample water supply systems vary from one Wastewater System to the next. The General Monitoring and Reporting Program states that the Discharger may request Central Coast Water Board Executive Officer approval to submit the reporting year's consumer confidence report (annual water quality report or drinking water quality report) in lieu of the required water supply sampling. Central Coast Water Board staff added a footnote to Table 2 of the General Monitoring and Reporting Program stating that if the Discharger does not have access to sample their water supply and the sampling suite and/or frequency required by the State Water Board Division of Drinking Water and/or county is different, less frequent, or sampled on a different schedule than what is proposed in Table 2, Central Coast Water Board staff will work with the Discharger at the time of enrollment to develop an appropriate and feasible sampling plan (including modifications to the sampling suite, sampling frequency, and/or sampling schedule).

Change Made to the General Permit: Staff revised Attachment D, General Monitoring and Reporting Program, Table 2.

City of Guadalupe – Comment 3

Table 4B, 5A, and 6A of the MRP require influent and effluent monitoring for water quality constituents in various treatment systems. Both influent and effluent monitoring should not be required for constituents not typically removed by the conventional wastewater treatment process. Why require duplicate samples of constituents that aren't impacted by the treatment process, such as boron, carbonate, bicarbonate, calcium, potassium, and magnesium? Either influent, or effluent analysis of these

constituents should be sufficient. Anything additional is duplicate cost without added benefit.

Staff Response to City of Guadalupe – Comment 3

For the following cations and anions: boron, carbonate, bicarbonate, calcium, potassium and magnesium, staff removed the effluent monitoring requirements from the General Monitoring and Reporting Program. Evaluating the effluent only (removing influent monitoring requirements) for these constituents will achieve the original intent of the monitoring requirements. Requiring the Discharger to monitor for these individual constituents in the effluent continues to facilitate fingerprinting of water via stiff and piper diagrams for relative comparisons of source and receiving waters and mixing evaluations (e.g., the data can be used to evaluate whether a receiving water is under the influence of a specific discharge).

Change Made to the General Permit: Staff revised Attachment D, General Monitoring and Reporting Program, Tables 4B, 5A, and 6A.

City of Guadalupe – Comment 4

Table 8 of the MRP requires that dischargers monitor supplemental irrigation daily. Supplemental irrigation is not always under the control of the discharger. It is recommended that this be removed from the table. Likewise, other elements of this table, including acreage applied, BOD [biochemical oxygen demand] applied, and salt supplied, are not as straightforward to monitor as they might appear, and should be removed. The acreage impacted at any given time can be changed on a frequency greater than daily and trying to calculate these application rates will require significant assumptions and data manipulations. Instead, it is recommended that the discharger work with the regulator to develop meaningful and site protective criteria based on typical effluent concentrations.

Staff Response to City of Guadalupe – Comment 4

The General Monitoring and Reporting Program is a template covering multiple treatment and disposal scenarios and it will be tailored to each individual Discharger's Wastewater System based on the information provided in the Discharger's application (e.g., monitoring requirements that are not relevant will be removed). Central Coast Water Board staff will work with the Discharger at the time of enrollment to determine which land application area, percolation pond, and spreading basin monitoring requirements is appropriate to confirm that water quality will be maintained at a level that is protective of beneficial uses and staff will modify Table 8 as appropriate.

Prohibition item 6 in the proposed General Permit indicates the discharge of waste to land not owned, operated, or controlled by the Discharger is prohibited. An exception to this prohibition is when recycled water is used as described in a title 22 California Code of Regulations (CCR), title 22, division 4, chapter 3 Engineering Report conditionally accepted by the State Water Board Division of Drinking Water. The Discharger must be cognizant of the volume of supplemental irrigation water added to the land application

area to effectively manage the land application of treated wastewater and to prevent ponding, runoff, erosion, etc.

Application and loading rate monitoring requirements are a means to effectively evaluate the mass of a specific waste applied over a given disposal area. This information, supplemented with other monitoring data (i.e., groundwater monitoring data), should be used to determine if there is a need to make operational and/or management changes (e.g., expand the disposal area, more effectively treat wastewater, etc.) at the Wastewater System to ensure the protection of water quality.

Staff modified Table 8 in the General Monitoring and Reporting Program to clarify that supplemental irrigation can be estimated or metered.

Change Made to the General Permit: Staff revised Attachment D, General Monitoring and Reporting Program, Table 8.

City of Guadalupe – Comment 5

It is recommended that the requirement for the date of solids removal from the wastewater system be removed from section V of the MRP as this data is not typically monitored and is irrelevant to protection of receiving waters.

Staff Response to City of Guadalupe – Comment 5

Central Coast Water Board staff reviewed the requirement for the Discharger to report the date of solids removal and its relevance to the protection of underlying water quality. Staff redefined the term ‘solids’, in General Monitoring and Reporting Program section V, to no longer include screenings and grit. Central Coast Water Board staff concur, tracking the handling and disposal of screenings and grit (e.g., paper, plastic, metal, sand, etc.) does not add value to or align with the intent of the draft General Permit; which is to protect underlying water quality and maintain beneficial uses. In accordance with the General Monitoring and Reporting Program requirements, the Discharger must report the handling and disposal of biosolids and sludge, both of which are rich in nutrients and other potentially harmful wastes and thus if not handled properly, have the potential to impact or degrade underlying water quality. The solids disposal monitoring requirements specified in the General Monitoring and Reporting Program will ensure and confirm that underlying water quality will be maintained at a level that is protective of beneficial uses.

Change Made to the General Permit: Staff revised Attachment A, Definitions and Attachment D, General Monitoring and Reporting Program, section V.

City of Guadalupe – Comment 6

Section VI of the MRP discusses groundwater monitoring. Dischargers have a choice between option 1, no groundwater monitoring program, or option 2, groundwater monitoring. Option 1 requires that the discharger demonstrate that the quality of effluent discharged from the wastewater system meets effluent limitations specified in Table 7 of the draft General Permit. These limits include that the sample maximum does not exceed 1,000 mg/L total dissolved solids (TDS) or a median of 25 months rolling data of

500 mg/L. This is unrealistic within the Santa Maria Valley, where the TDS of source waters such as Cuyama River, contain an excess of 1,000 mg/L TDS, as indicated on page 4 of the Central Coast Basin Plan. This criteria forces dischargers in the Santa Maria Valley to option 2, a groundwater monitoring program. It is difficult to demonstrate that a wastewater discharge is not degrading underlying groundwater quality when surrounded by irrigation and other agricultural practices with similar constituents of concern. The City of Guadalupe has had a groundwater monitoring program for years and has found it challenging to parse out the influence of wastewater discharge versus the influence of surrounding agricultural practices. This section needs to be rewritten in a manner that allows wastewater dischargers with high source water constituents to meet the requirements of option 1, effluent monitoring.

Staff Response to City of Guadalupe – Comment 6

The proposed General Permit includes effluent limitations and a process to determine how to apply these limits. Implementation of the applicable effluent limitations will result in the best practicable treatment or control for the wastewater, and corresponding monitoring requirements specified in the proposed General Permit will ensure the best practicable treatment or control is effective and confirms that water quality will be maintained at a level that is protective of beneficial uses.

The proposed General Permit presents effluent limitations that must be met by the Discharger and effluent limitations that are conditional (draft General Permit Table 7, now renumbered in the proposed General Permit as Table 6). Guadalupe's comment refers to the conditional effluent limitations specified in Table 7 of the draft General Permit. As presented in the limitations section of the proposed General Permit (section V.A.2), the Discharger must identify the groundwater basin/sub-area that underlies the Wastewater System disposal/dispersal area.

The General Permit provides two options: option 1 - comply with effluent limitations specified; or option 2 - implement a groundwater monitoring program to demonstrate compliance with the water quality objectives specified in the Basin Plan.

The City of Guadalupe has expressed concern about their effluent meeting the following limitations: a sample maximum does not exceed 1,000 milligrams per liter (mg/L) total dissolved solids or a 25-month rolling median of 500 mg/L and therefore being required to implement the Option 2 groundwater monitoring program. The conditional effluent limitations specified in their comment does not apply to their Wastewater System. Guadalupe's Wastewater System overlies a designated groundwater basin (Santa Maria River Valley - Upper Guadalupe) and thus they are required to comply with the Basin Plan median water quality objectives as presented in Basin Plan Table 3-6. The median water quality objective for total dissolved solids is 1,000 mg/L and thus if Guadalupe chooses to proceed with option 1, the Wastewater System's effluent must not exceed a 25-month rolling median of 1,000 mg/L for total dissolved solids. If Guadalupe is unable to comply with these conditional effluent limitations, they must demonstrate the discharge is not degrading underlying water quality through the implementation of a groundwater monitoring program.

If the water supply monitoring data demonstrates concentrations of target constituents are in excess of median water quality objectives specified in the Basin Plan, Central Coast Water Board staff will work directly with the Discharger to determine a path forward (e.g., identification of a new source of water supply if feasible, development of source control management strategies, etc.).

Central Coast Water Board staff will identify the applicable Wastewater System specific effluent limitations and corresponding monitoring requirements for a Wastewater System in the notice of applicability. The parameters used within this proposed General Permit to determine Wastewater System specific effluent limitations and monitoring requirements includes, but is not limited to treatment technology, underlying groundwater basin/sub-area, raw wastewater characteristics, and reclamation of non-potable treated wastewater.

The City of Guadalupe also expressed concern that they have had a groundwater monitoring program for years and have found it challenging to parse out the influence of wastewater discharge versus the influence of surrounding agricultural practices. As indicated in the General Monitoring and Reporting Program, the number of wells and location of the groundwater monitoring well network must be on a scale sufficient to determine potential impacts and be sufficiently representative of groundwater conditions upgradient and downgradient of the permitted disposal/dispersal area. If the Discharger is unable to determine the influence of their wastewater discharge versus the influence of surrounding agricultural practices, the Discharger may need to make modifications to the existing groundwater monitoring program (e.g., install additional groundwater monitoring wells, add tracer compounds [e.g., caffeine, etc.] to the analytical testing program, use stiff and piper diagram fingerprinting to evaluate whether a receiving water is under the influence of a specific discharge, etc.).

To provide clarity, staff deleted draft General Permit Table 7 and replaced it with two tables, one for discharges to basins identified in Table 3-6 of the Basin Plan and one for discharges to all other basins.

Change Made to the General Permit: Staff deleted draft General Permit Table 7 and replaced it with two tables numbered Table 6 and Table 7 in the proposed General Permit.

City of Santa Maria – Comment 1

The City owns and operates a municipal wastewater collection, treatment, and disposal system that provides service to the City of Santa Maria, Santa Maria Airport District, and part of the Laguna County Sanitation District. The wastewater treatment plant ("WWTP") accepts and treats wastewater from commercial, industrial and residential customers and also includes a septage receiving station upstream of the headworks. The WWTP uses trickling filters as the principal process to treat up to 13.5 million gallons per day (MGD), with wastewater treatment processes including headworks, grit removal, primary clarifiers, trickling filters, intermediate clarifier, secondary trickling filters, secondary clarifiers, gravity sludge thickeners, anaerobic digesters, and sludge

drying beds. Treated wastewater is disposed through the use of percolation ponds on approximately 120 acres.

The wastewater collection, treatment, and disposal system is regulated by an individual Waste Discharge Requirements ("WDR") from the Regional Board (Order No. R3-2010-0001) and by State Water Resources Control Board Order No. 2006-0003-DWQ (the "SSO Order").

The City takes seriously its responsibility for operating the collection and treatment system, has reviewed the Proposed Order, and has met with Regional Board staff regarding the Proposed Order. This comment letter requests that the City continue to be regulated under Order No. R3-2010-0001 and the SSO Order rather than be required to enroll under the Proposed Order. The reasons for this request are set forth in this letter.

Water Code section 13263 authorizes a regional board to prescribe general waste discharge requirements for a category of discharges if all of the following criteria apply to the discharges in that category:

(1) The discharges are produced by the same or similar operations.

(2) The discharges involve the same or similar types of waste.

(3) The discharges require the same or similar treatment standards.

(4) The discharges are more appropriately regulated under general discharge requirements than individual discharge requirements.

The City believes discharges from the WWTP do not satisfy any of the criteria required for regulation under the Proposed Order as written.

1. Discharges are not produced by the same or similar operations.

First, discharges from the City's WWTP are not produced by the same or similar operations. All other wastewater treatment plants proposed to be regulated under the Proposed Order are substantially smaller than the City's WWTP. The City is permitted to discharge 13.5 MGD [million gallons per day] into percolation ponds covering 120 acres. The next largest treatment facility expected to enroll under the Proposed Order is less than one-half the size of the City's WWTP. The remaining facilities are mostly small treatment plants that collect and treat mostly residential wastewater.

Further, the City's WWTP is a trickling filter plant. Only four other trickling filter plants are identified for enrollment under the Proposed Order (Atascadero State Hospital, Camp Roberts (West), Lake San Antonio Recreation, and Las Palmas Ranch). The largest of these trickling filter plants is a fraction of the size of the City's WWTP at 1 MGD. Yet, all of the trickling filter WWTPs are subject to the same Secondary Treatment Standards. None of the other trickling filter plants accept wastewater containing residential, commercial, industrial and high organically loaded septage waste that the City's WWTP accepts, demonstrating that the City's WWTP is not similar to the other trickling filter plants included in this Proposed Order.

Staff Response to City of Santa Maria – Comment 1

While the City of Santa Maria's wastewater flows are the largest flows that will be enrolled in this proposed General Permit, their system has similar operations, with similar types of waste, as the other Wastewater Systems. Santa Maria's wastewater system is consistent with the description of domestic wastewater treatment as defined in section II.A.6. The City of Santa Maria employs biofiltration (e.g., trickling filters), clarification, and land disposal methods similar to all other Wastewater Systems proposed for regulation under this proposed General Permit. There will be several trickling filter systems enrolled in the proposed General Permit and other Wastewater Systems may accept wastewater containing residential, commercial, industrial, and high organically loaded waste.

The City of Santa Maria's wastewater is consistent with Attachment A that defines domestic wastewater as "Wastewater from households, commercial establishments, and industries."

Although the flow to the City of Santa Maria Wastewater System is large, the limitations in the proposed General Permit are not variable as a function of influent flow or concentration, rather the proposed General Permit sets limitations that are protective of water quality and associated beneficial uses. Staff updated section II.I.6 of the General Permit to clarify that the variability of influent flow or concentration should be addressed in the design and operation of a Wastewater System such that the effluent discharged meets the limitations of the proposed General Permit.

The four biofiltration Wastewater Systems listed in the comment currently accept residential wastewater and have the potential to accept domestic wastewater flows that contain commercial and industrial discharges. Like the City of Santa Maria, each Wastewater System has waste discharge requirements for the protection of water quality and associated beneficial uses. Regardless of the volume of flow and concentrations of wastes in the raw wastewater (influent), all dischargers, like the City of Santa Maria, are required to treat the influent to meet the conditions of their permit. If waste loads (e.g., organics, grease, etc.) in the influent are overloading the current biofiltration system, that Wastewater System may need to implement pretreatment to ensure performance and compliance with the conditions of a permit. Implementation of a pretreatment program is allowed under conditions of the proposed General Permit.

Consistent with California Water Code section 13263(i), individual waste discharge requirements are not necessary for the City of Santa Maria because the discharges are similar and discharge requirements would be similar if individual waste discharge requirements were issued. If Central Coast Water Board staff were to develop an individual permit for the City of Santa Maria, it would likely contain identical requirements as the proposed General Permit.

Change Made to the General Permit: Staff revised General Permit section II.I.6.

City of Santa Maria – Comment 2

2. Discharges do not involve the same or similar types of waste.

Second, discharges from the City's WWTP do not involve the same or similar types of waste. Nearly all facilities expected to enroll under the Proposed Order accept only domestic wastewater. The City, however, accepts industrial wastewater under its pretreatment program and is the only wastewater facility in San Luis Obispo and Santa Barbara Counties with a septage receiving station. (See Central Coast Regional Water Quality Control Board, Staff Report, "Reissuance of Waste Discharge Requirements for the City of Santa Maria Wastewater Facility (Order No. R3-2010-0001), at p. 3.) The City accepts septic waste, septage waste, and decanted grease waste from Santa Barbara County and San Luis Obispo County. Nearly all of which is produced outside of the City's service area. In 2019, the City accepted about 9.78 million gallons of septage waste. The City's acceptance of septage waste provides an important public service for wastes that would otherwise be placed into the environment. The result, however, is higher organic loading to the City's WWTP as compared to other plants proposed to be included under this Proposed Order

Staff Response to City of Santa Maria – Comment 2

Central Coast Water Board staff acknowledge that the City of Santa Maria's Wastewater System accepts septic waste, septage waste, and decanted grease waste from Santa Barbara County and San Luis Obispo County. These waste streams are consistent with the description of domestic wastewater as defined in Attachment A, Definitions.

The proposed General Permit sets limitations for Wastewater Systems that accept wastewater containing residential, commercial, industrial and high organically loaded waste. The limitations in the proposed General Permit are not variable as a function of influent flow or concentration, rather the proposed General Permit sets limitations that are protective of water quality and associated beneficial uses. The variability of influent flow or concentration should be addressed in the design and operation of a Wastewater System such that the effluent discharged meets the limitations of the proposed General Permit.

The design biochemical oxygen demand concentration for the City of Santa Maria's Wastewater System was estimated to be 323 milligrams per liter (mg/L) (City of Santa Maria, Basis of Design, Carollo Engineers, 2007). The City of Santa Maria's Wastewater System has a documented concentration biochemical oxygen demand range of 374 to 488 mg/L (City of Santa Maria 2019 Annual Report). The City of Santa Maria's Wastewater System design concentration and operating concentration ranges are similar to biochemical oxygen demand operating concentration ranges observed at both the Atascadero State Hospital (biochemical oxygen demand concentrations of 82 to 394 mg/L, Atascadero State Hospital 2019 Annual Report) and Las Palmas Ranch WWTP concentrations (biochemical oxygen demand concentrations of 165 to 818 mg/L, Las Palmas Ranch WWTP 2019 Annual Report). Based on available data, the biochemical oxygen demand concentrations of the influent to the City of Santa Maria Wastewater System are similar concentrations observed at other Wastewater Systems in the Central Coast Region.

Change Made to the General Permit: None.

City of Santa Maria – Comment 3

3. Discharges require different treatment standards.

Third, discharges from the City's WWTP are also subject to different treatment standards than other facilities expected to enroll under the Proposed Order. The Proposed Order establishes effluent limitations consistent with US EPA secondary treatment standards based on treatment technology, raw wastewater characteristics, and underlying Groundwater Basin. The Secondary Treatment Effluent Limitations listed in Table 4 for trickling filters do not take into account and allow for the application of Equivalent to Secondary Treatment Standards as outlined in the US EPA document cited in the Proposed Order. Equivalent to Secondary Treatment Standards can be applied to "certain facilities employing waste stabilization ponds or trickling filters as the principal process."[5] As stated in the US EPA document, "unless alternate limitations were set for facilities with trickling filters ...such facilities could be required to construct costly new treatment systems to meet the secondary standards even though the existing treatment technologies could achieve significant biological treatment." In reviewing the limits provided in Table 4 of the Proposed Order, the City of Santa Maria cannot achieve the proposed Secondary Treatment Effluent Limitations and would be subject to an upgrade that would run in the tens to hundreds of millions of dollars, would require eight to twelve years to evaluate and select a design option, request proposals and select a consultant to prepare design and construction documents, bid and award the construction, and construct, all while evaluating the costs and establishing new sewer rates through the Proposition 218 process and securing financing for construction.

Additionally, the US EPA document also provides for a substitution of $CBOD_5$ [five-day carbonaceous biochemical oxygen demand] for BOD_5 [five-day biochemical oxygen demand] when applying the Equivalent to Secondary Treatment Standards for wastewaters with significant nitrogen content (such as facilities that accept septage waste). The City's current WDR [waste discharge requirements] (by way of letter) allows for the substitution of $CBOD_5$ for BOD_5 thus minimizing false indications of poor facility performance as a result of nitrogenous oxygen demand.

Consistent with Part 133 of Title 40 of the Code of Federal Regulations, the City's WDR includes "Equivalent to Secondary Treatment" performance standards, which are authorized for facilities employing trickling filters as the principal process. (40 C.F.R. § 133.101(g); see also, U.S. EPA, NPDES Permit Writers' Manual, Chapter 5 (Sept. 2010).) These equivalent to secondary treatment standards include a substitution of $CBOD_5$ for BOD_5, as authorized by Section 133.105(e) of Title 40 of the Code of Federal Regulations. The Proposed Order does not recognize or include the unique

[5] US EPA Office of Wastewater Management, Water Permits Division, State and Regional Branch, EPA-833-K-10-001, September 2010

treatment standards included in R3-2010-0001. For example, Order No. R3-2010-0001 contains the following limitations for the City's WWTP, which are different from those contained in the Proposed Order:

Order No. R3-2010-0001, Provision 8.2:

2. Effluent discharged to disposal ponds shall not exceed the following limitations:

Constituent	Units	Monthly Average	Daily Maximum
BOD (5-day)*	mg/L	60	100
TSS	mg/L	60	100
Settleable Solids	mg/L	0.1	0.4
Total	Dissolved Solids	mg/L	1,000
Sodium	mg/L	180	---
Chloride	mg/L	180	---
pH	Within the range 6.5 to 8.4		

*The City received under separate letter, a concurrence from the water board to use $CBOD_5$ in lieu of BOD_5.

Proposed Order, V.A.1 and Table 4

3. The Discharger is required to comply with the applicable secondary treatment effluent limitations specified in Tables 3, 4, and 5.

Table 4. Secondary Treatment Effluent Limitations - Trickling Filters

Constituent	Units	30-Day Average	7-Day Average	Sample Maximum
BOD (5-day)	mg/L	30	45	90
TSS	mg/L	30	45	90

Settleable Solids	ml/L	0.3	n/a	0.5
Total Nitrogen (as N)	mg/L	n/a	n/a	10
pH	n/a	Not less than 6.5 or greater than 8.4	n/a	n/a

Failure of the Proposed Order to recognize the unique equivalent to secondary treatment standards that apply to the City's WWTP ignores congressional directives to provide "allowances for alternative biological treatment technologies, such as trickling filters" that lead to the promulgation of regulations at § 133.105 of Title 40 of the Code of Federal Regulations. (U.S. EPA NPDES Permit Writers' Manual, § 5.1.1.2 (Sept. 2010); see also *Public Law 97-117, Section 23*.)

Staff Response to City of Santa Maria – Comment 3

USEPA has provisions[6] for equivalent to secondary treatment standards for wastewaters that substitute five-day carbonaceous biochemical oxygen demand ($CBOD_5$) for five-day biochemical oxygen demand (BOD_5) when applying the equivalent to secondary treatment standards for wastewaters with significant nitrogen content (such as facilities that accept septage waste).

For a Wastewater System to achieve nitrogen reduction, five-day biochemical oxygen demand reduction will be required. Allowing a Wastewater System to comply with equivalent to secondary treatment standards (including five-day biochemical oxygen demand requirements less stringent than those in the proposed General Permit) may limit the nitrogen reduction processes. Enrollment in this proposed General Permit requires the Discharger to meet specific requirements protective of underlying water quality.

The proposed General Permit does recognize the unique equivalent to secondary treatment standards that currently apply to the City's wastewater treatment plant and does not ignore congressional directives to provide "allowances for alternative biological treatment technologies, such as trickling filters," rather, the proposed General Permit

[6] USEPA has established eligibility requirements for discharge limitations based on equivalent to secondary standards. A Wastewater System must meet all three criteria as specified in Code of Federal Regulations, section 133.105. An applicant must provide an analysis documenting that their Wastewater System meets all three criteria.

recognizes that without adequate reduction in five-day biochemical oxygen demand, nitrogen removal will most likely be difficult to achieve.

The level of five-day biochemical oxygen demand reduction allowed by the equivalent to secondary treatment standards may be sufficient to allow for nitrogen reduction processes to occur. Central Coast Water Board staff revised the draft General Permit to include the equivalent to secondary treatment standards and eligibility requirements for any Wastewater System to consider them when applying for enrollment into the General Permit. Staff added footnote 13 to Table 3 and 4 that clarifies eligibility to use discharge limitations based on equivalent to secondary standards.

Central Coast Water Board staff modified sections V.A and VI.A.5 of the draft General Permit to provide enrollees 24 months to achieve the effluent limitations. Central Coast Water Board staff also added language to the General Permit stating that if any enrollee determines that it needs to make significant upgrades to their system to protect the beneficial uses of the groundwater basin that will take more than two years to implement, the enrollee may submit for approval to the Central Coast Water Board a detailed time schedule of actions to complete the upgrades and obtain a Time Schedule Order with milestones to provide additional time.

Change Made to the General Permit: Staff revised General Permit Table 3, Table 4, section V.A, and section VI.A.5.

City of Santa Maria – Comment 4

4. [To be eligible for general waste discharge requirements under Water Code section 13263 the following must be true:] Discharges are more appropriately regulated under general discharge requirements than individual discharge requirements.

Finally, discharges from the City's WWTP are more appropriately regulated under individual waste discharge requirements. In 2014, the City applied for and received support from the U.S. EPA to prepare an Integrated Plan. An Integrated Plan is a process that identifies efficiencies from separate wastewater and stormwater programs to best prioritize capital investments and achieve our human health and water quality objectives.[7] In 2014 and 2015, the City undertook collaborative efforts with the EPA, EPA consultants, Regional Board staff, and watershed stakeholders to prepare an Integrated Plan. The City submitted the Integrated Plan to the Regional Board in 2016 and proposed to consolidate all of the City's water quality requirements into a single regulatory mechanism. The Integrated Plan proposed specific and measurable steps the City will take to address those requirements and to apply the City's resources cost-effectively towards feasible and flexible actions that achieve the greatest improvements in water quality and quantity. The Integrated Plan has never been approved or incorporated into a waste discharge requirements. A general permit such as the

[7] U.S. EPA " Integrated Municipal Stormwater and Wastewater Planning Approach Framework," June 5, 2012.

Proposed Order is contrary to the EPA's support for the Integrated Plan, because it fails to incorporate any portion of the Integrated Plan. Instead, the Proposed Order will further silo the City's water quality efforts by requiring the City to undertake unnecessary and duplicative planning and reporting actions. As recently as December 2019, the EPA has urged permit writers "to move ahead with utilizing integrated plans ... in future NPDES permitting actions[.]" Requiring the City to enroll under a general permit that does not incorporate any proposals from the Integrated Plan, such as the Project described below, and that fails to recognize the WWTP's unique size, influent, and treatment standards is a step in the wrong direction.

Further, the City has received a Proposition 1 Stormwater Program Grant from the State Water Resources Control Board to partially fund the "Main Street Subwatershed Improvement Project," ("Project") a project included in the City's Integrated Plan, discussed above. The Project will divert and treat approximately 100 million gallons, or

300 acre-feet per year, of stormwater from the City's West Main Street storm drain system. This stormwater is a combination of urban runoff and agricultural tail water. The diverted flows will be conveyed to the City's WWTP and be discharged into a woodchip denitrification bioreactor, which will convert the high-nitrate levels within the water into nitrogen gas. The treated water would then be conveyed to a repurposed percolation pond within the northwest portion of the WWTP property, allowing the treated effluent to infiltrate into the groundwater basin. Without the flexibility provided by an individual permit, this important Project may not be able to proceed.

In a call with Regional Board staff regarding these different standards, it was suggested that the City should adjust source water to help address wastewater discharge limits. The City, however, does not have the ability to make this adjustment. In accordance with an order of the Santa Clara Superior Court in *Santa Maria Valley Water Conservation District v. City of Santa Maria*, Case CV 770214, the City is required to take not less than 10,000 acre feet of water from the State Water Project when available, is prohibited from relinquishing or terminating its contract with the State Water Project, and is required to seek renewal of its contract with the State Water Project. As a result, the City cannot adjust its source water for the sole reason of improving effluent discharges.

Discharges from the WWTP do not satisfy any of the criteria required for regulation under the Proposed Order, as written. For this reason, a general permit, such as the Proposed Order, is not an appropriate regulatory mechanism for the WWTP. The City, therefore, requests that the Proposed Order be modified as shown below to exclude the City from regulation under the Proposed Order and urges the Regional Board to incorporate the Integrated Plan into a single regulatory mechanism issued directly to the City or continue to regulate the City under individual waste discharge requirements.

Staff Response to Comment City of Santa Maria – 4

Although an individual permit could be developed for the City of Santa Maria’s Wastewater System, the proposed General Permit should not preclude the option of allowing enrollment of the City's Wastewater System in the proposed General Permit.

As stated in the proposed General Permit, an evaluation will take place prior to enrollment that "upon review of an application, Central Coast Water Board staff will determine if coverage under this General Permit is appropriate."

The City of Santa Maria's Integrated plan has not been approved by the Central Coast Water Board. Enrollment into the proposed General Permit would not prohibit the Integrated Plan proposed process. Any wastewater permit that would be issued to the City of Santa Maria in the future as part of an Integrated Plan would need to contain the same fundamental requirements as the proposed General Permit such that the beneficial uses of the groundwater basin are protected.

Enrollment in the proposed General Permit requires the development of a notice of applicability for an individual Wastewater System. The proposed General Permit section IV. A.2.ii, states that the notice of applicability will include, at a minimum, site-specific conditions and requirements. This does not preclude the approval or future incorporation of approved Integrated Plan elements into a notice of applicability.

The proposed General Permit will not prevent the stormwater treatment project, Main Street Subwatershed Improvement Project, from moving forward. The proposed General Permit contains requirements for the protection of water quality and associated beneficial uses. Any treated water conveyed to a repurposed percolation pond within the northwest portion of the City of Santa Maria's Wastewater System property for infiltration into the groundwater basin, should be protective of water quality and support attainment of the groundwater quality median objectives. As stated above, the notice of applicability is a flexible process and will support implementation of this project.

Communication between Central Coast Water Board staff and the City of Santa Maria staff regarding adjustment of source water to help address compliance with proposed effluent limitations is one of the many items discussed between the two entities. Central Coast Water Board staff recognize that specific management strategies may not work for all Wastewater Systems. If the City does not have the ability to make this adjustment, the Central Coast Water Board will continue to work with the City to help identify implementable management actions that will protect water quality and associated beneficial uses.

Based on a preliminary data review, Central Coast Water Board staff determined that discharges from the City of Santa Maria's Wastewater System are impacting water quality and the individual permit needs to be revised. Discharges from the City of Santa Maria's Wastewater System do satisfy the criteria required for regulation under the proposed General Permit. Moreover, the proposed General Permit notice of applicability requirements do allow for incorporation of the elements of an approved Integrated Plan. The proposed General Permit is an appropriate regulatory mechanism for the City of Santa Maria's Wastewater System.

Change Made to the General Permit: None.

City of Santa Maria – Comment 5

Requested Revisions [to General Permit R3-2020-0020:]

Proposed Permit § II.A.4

Wastewater Systems with monthly average flow rates of more than 100,000 gallons per day that discharge to land are eligible for coverage under this General Permit. Wastewater Systems are typically located at commercial or residential subdivisions, communities, cities, and correctional facilities. Unless exempted in finding A.16, An owner and/or operator of a Wastewater System(s) is referred to as a Discharger(s) in this General Permit.

City of Santa Maria Wastewater Facility, Waste Discharger Identification No. 3 420109007, is exempt from this Order.

Staff Response to City of Santa Maria – Comment 5

Based on a preliminary data review, Central Coast Water Board staff have determined that discharges from the City of Santa Maria's Wastewater System do satisfy the criteria required for regulation under the proposed General Permit. The proposed General Permit is an appropriate regulatory mechanism for the City of Santa Maria's Wastewater System. See staff responses to City of Santa Maria - Comments 1 through 4.

Change Made to the General Permit: None.

City of Santa Maria – Comment 6

The City's concern is the grave financial implications of this Proposed Order on the City and its ratepayers and an awareness that the City will need at least ten years to comply with the Proposed Order as written. An additional awareness that the City is already implementing many of the required programs and plans included in the Proposed Order such as the Pretreatment Program, participation in a Regional Salt and Nutrient Management Plan, continuous monitoring of an existing groundwater monitoring program, raw water monitoring, and implementing an existing Operations and Maintenance Manual. Clarification is requested for those facilities with existing plans and programs as to whether the existing plans and programs will meet the requirements in the Proposed Order.

Staff Response to City of Santa Maria – Comment 6

Existing plans and programs may meet the requirements in the proposed General Permit. The effectiveness of the implementation efforts associated with those plans and programs for the protection of water quality and associated beneficial uses will be a determining factor. Central Coast Water Board staff will work with the City of Santa Maria staff to review the results of the plans and programs and determine if revisions to those plans and programs are necessary to meet the requirements of the proposed General Permit.

For the comment regarding needing time to comply with the General Permit, language was added to the draft General Permit to provide enrollees with the option to request additional time to come into compliance with the General Permit requirements. See the last paragraph of staff responses to City of Santa Maria - Comment 3.

Change Made to the General Permit: Staff revised General Permit section V.A and section VI.A.5.

City of Santa Maria – Comment 7

Requirements listed in the Proposed Draft General Monitoring and Reporting Program Order R3-2020-0020 ("Proposed MRP") that need clarification are the requirements for qualified personnel for sampling and analysis and groundwater monitoring, clarification for pond system monitoring, pond terminology, and land application monitoring for percolation ponds (Table 8).

Staff Response to Comment City of Santa Maria – 7

Regarding clarification of the requirements for qualified personnel for sampling, analysis, and groundwater monitoring, the General Monitoring and Reporting Program states (see Attachment D, section VI.B.2) that a qualified individual (e.g., consultant, technician, etc.) is someone trained in proper sampling methods, is familiar with how to recover samples using approved U.S. EPA methods, capable of assessing depth to groundwater, and determining groundwater elevations. This individual should also know how to implement correct well sampling procedures. Well sampling procedures include purging and ensuring that measurements of the following parameters have stabilized prior to sampling (i.e., are reproducible within 10 percent): pH, temperature, dissolved oxygen, electrical conductivity, and turbidity. Qualified individuals should be described in a Discharger's sampling and analysis plan.

Central Coast Water Board staff modified the General Monitoring and Reporting Program to clarify pond system monitoring and terminology. Staff added clarifying language to section III.C.1.ii, section III.C.1.iii, section IV, and section VII.A.2.iii of Attachment D. In addition, staff added new definitions for disposal ponds, impoundment, and spreading basins/rapid infiltration beds to Attachment A.

Central Coast Water Board staff will work with the Discharger at the time of enrollment to determine the need and frequency of land application monitoring for percolation ponds. These monitoring requirements will ensure the best practicable treatment or control is effective and confirm that water quality will be maintained at a level that is protective of beneficial uses.

Change Made to the General Permit: Staff revised: Attachment A; and Attachment D, General Monitoring and Reporting Program, section III.C.1.ii, section III.C.1.iii, section IV, and section VII.A.2.iii**.**

City of Santa Maria – Comment 8

Awareness of possible conflicts in the raw water monitoring requirements if dischargers are relying on data from water purveyors in their service area.

The water monitoring should be aligned to the frequency and constituents listed in the water purveyor's permit issued through the Division of Drinking Water ("DDW") and allowances should be made for when DDW revises permits. Also note that if a WWTP is going to use data from a water purveyor's Consumer Confidence Report ("CCR"), know

that the previous calendar year's CCR is due by July 1st of the following year, far later than the due date of the annual report requiring the raw water data, in the Proposed MRP.

Staff Response to City of Santa Maria – Comment 8

The General Monitoring and Reporting Program is a template covering multiple treatment and disposal scenarios and it will be tailored to each individual Discharger's Wastewater System based on the information provided in the Discharger's application (e.g., monitoring requirements that are not relevant will be removed).

Central Coast Water Board staff added a footnote to General Monitoring and Reporting Program Table 2 that clarifies that staff will modify the General Monitoring and Reporting Program at the time of enrollment to align the supply water monitoring with the water purveyor's permit issued through the Division of Drinking Water.

The Discharger may be required to monitor for additional constituents in the source water if it is determined that those wastes are impacting water quality.

Change Made to the General Permit: Staff revised Attachment D, General Monitoring and Reporting Program, Table 2.

City of Santa Maria – Comment 9

Consider removing screenings and grit from Section V of the Proposed MRP

Staff Response to City of Santa Maria – Comment 9

Central Coast Water Board staff redefined the term 'solids', in the General Monitoring and Reporting Program section V, to no longer include screenings and grit and updated the definition in Attachment A. Staff also modified the definition of sludge in Appendix A. Central Coast Water Board staff have determined that tracking the handling and disposal of screenings and grit (e.g., paper, plastic, metal, sand, etc.) does not add value to or align with the intent of the proposed General Permit; which is protect underlying water quality and maintain beneficial uses.

Change Made to the General Permit: Staff revised: Attachment A, Definitions; and Attachment D, General Monitoring and Reporting Program, section V.

City of Santa Maria – Comment 10

Allow for best management practices for dried sludge (biosolids) storage prior to disposal as listed in Section D.3 of the Proposed Order.

Staff Response to City of Santa Maria – Comment 10

Draft General Permit section IV.D.3 (this section has been renumbered to IV.E.3 in the proposed General Permit) states "Any storage of residual sludge, solid waste, or biosolids at the Wastewater System must be temporary, and the waste must be controlled and contained in a manner that minimizes leachate formation and precludes runoff or infiltration of waste into soils and groundwater."

This requirement allows for best management practices for dried sludge (biosolids) storage prior to disposal.

Change Made to the General Permit: None.

City of Santa Maria – Comment 11

Clarification on the reasoning for using grab samples for effluent monitoring.

Staff Response to City of Santa Maria – Comment 11

The General Monitoring and Reporting Program is a template covering multiple treatment and disposal scenarios and each General Monitoring and Reporting Program will be tailored to each individual Discharger's Wastewater System based on the information provided in the Discharger's application (e.g., monitoring requirements that are not relevant will be removed) or updated report of waste discharge.

The use of effluent grab or composite sampling will be determined at the time of enrollment and during the preparation of a General Monitoring and Reporting Program based on information provided and discussions with the Discharger for each facility.

Change Made to the General Permit: None.

Mission Hills – Comment 1

Mission Hills CSD would like to request that Table 3. Secondary Treatment Effluent Limitation – Treatment Ponds be recommended limitations.

Staff Response to Mission Hills – Comment 1

California Water Code section 13263(a) states "The regional board, after any necessary hearing, shall prescribe requirements as to the nature of any proposed discharge, existing discharge, or material change in an existing discharge, except discharges into a community sewer system, with relation to the conditions existing in the disposal area or receiving waters upon, or into which, the discharge is made or proposed. The requirements shall implement any relevant water quality control plans that have been adopted, and shall take into consideration the beneficial uses to be protected, the water quality objectives reasonably required for that purpose, other waste discharges, the need to prevent nuisance, and the provisions of section 13241."

State regulations dictate that the Central Coast Water Board "prescribe requirements" such as those in proposed General Permit No. R3-2020-0020, Table 3. Secondary Treatment Effluent Limitations. As requested, "recommended limitations" would not be considered requirements and would not be enforceable as described in the California Water Code.

Change Made to the General Permit: None.

California American Water – Comment 1

In the proposed general permit document, "monthly average flow rates" and "flow rates" are frequently referenced, but not clearly defined as to the type in terms of influent

versus effluent. CAW recommends Regional Board to clearly define its type when flow rate is referenced. This will eliminate any ambiguity.

Staff Response to California American Water – Comment 1

Central Coast Water Board staff revised language in the draft General Permit to clearly define the flow rates in terms of influent. In addition, the term monthly average flow rate was defined in Appendix A.

Change Made to the General Permit: Staff revised General Permit, section IV.A and Appendix A, Definitions.

California American Water – Comment 2

Given the cost and amount of time required for certain plants to comply with this new permit, CAW requests compliance be done via a multi-phase approach with the first phase being an initial planning study. This planning study with let everyone better understand the anticipated cost and schedule for any improvement options being considered.

Staff Response to California American Water – Comment 2

Central Coast Water Board staff recognize that there may be financial and time constraints for any Wastewater System that may be regulated by this proposed General Permit. Central Coast Water Board staff modified the draft General Permit to create a two-phase approach to the effluent limitations. Unless granted an extension as discussed below, Dischargers must achieve compliance with the effluent limitations contained in the proposed General Permit within two years of enrollment, and in the interim must continue to comply with the effluent limitations in their existing individual permit. Staff also added language to the draft General Permit that provides a process for developing a time schedule order for those facilities that cannot achieve compliance with the effluent limitations contained in Tables 3-7 of the proposed General Permit within 24 months. For facilities that need more than 24 months, the Discharger may request a time schedule order to allow additional time to comply with the effluent limitations in the proposed General Permit.

Change Made to the General Permit: Staff revised: General Permit section V.A, section V.A.2, and section VI.A.5; and Attachment D, General Monitoring and Reporting Program, section VII.A.

California American Water – Comment 3

The proposed draft General Permit allows groundwater monitoring to be a compliance option. While CAW supports the approach of providing additional compliance options, it believes that installing groundwater monitoring wells and conducting routine water quality monitoring at those wells is a costly option without significant long-term benefits for groundwater protection. CAW would like the Regional Board to encourage wastewater systems to spend money on improving wastewater system facilities instead of groundwater monitoring. CAW would also like the Regional Board to recognize that improvement of wastewater facilities is a long-term effort as wastewater systems are

often constrained by budget and planning processes, especially for investor-owned facilities due to the rate-case process regulated by California Public Utilities Commission.

Staff Response to California American Water – Comment 3

Central Coast Water Board staff agree that the preferred long-term strategy is for Wastewater Systems to improve operational practices and upgrade their facility as necessary to protect groundwater quality and associated beneficial uses. Central Coast Water Board staff recognize that improvement of Wastewater Systems may be a long-term effort and revised the draft General Permit to allow time for Wastewater Systems to achieve compliance with the conditions of the proposed General Permit. The revisions include an allowance of 24 months to come into compliance with the effluent limitations before needing to choose the groundwater monitoring option. See staff response to California American Water – Comment 2.

Change Made to the General Permit: Staff revised: General Permit section V.A, section V.A.3 (renumbered to section V.A.2), and section VI.A.5; and Attachment D, General Monitoring and Reporting Program, section VII.A.

California American Water – Comment 4

The proposed permit has specific requirement on Nitrate levels, which is significantly more difficult to meet in some of CAW's facilities due to existing treatment processes in place. CAW would have to spend millions of dollars to upgrade its treatment facilities to meet the new requirement. CAW requests the Regional Board to consider the relative contributions from domestic wastewater systems and agricultural activities in the region and reevaluate its Nitrate requirements for domestic wastewater systems.

Staff Response to California American Water – Comment 4

The proposed General Permit addresses nitrogen impacts from wastewater treatment facilities in the Central Coast region. Central Coast Water Board staff recognizes there could be significant costs associated with changes to improve operational practices or upgrades a Wastewater System. Some of those costs may be necessary to protect water quality and associated beneficial uses. The nitrogen limits in the proposed General Permit have been legally established as necessary for the protection of water quality and associated beneficial uses. Please refer to the Central Coast Water Quality Control Plan (Basin Plan) chapter three and Tables 3-1, 3-2, and 3-6. Staff encourages dischargers to conduct an evaluation of their facilities and look for low cost solutions for nitrogen reduction first. Some Wastewater Systems in our region have made significant reductions to nitrogen loads without spending millions of dollars.

The Central Coast Water Board recognizes there are also significant nitrogen loads associated with agriculture operations that impact or may impact water quality and associated beneficial uses in our region. To address those agricultural contributions in our region, the Central Coast Water Board irrigated lands program has developed a draft revised General Waste Discharge Requirements for Discharges from Irrigated Lands. Here is a link to the proposed agriculture permit and supporting documents:

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/ag_order4_renewal.html

Change Made to the General Permit: None.

California American Water – Comment 5

For Table 1 of the proposed permit (summary of domestic wastewater characteristics), CAW would like the Regional Board to recognize that the water conservation efforts during last decade or so may have significantly impacted the characteristics of domestic wastewater and the numbers cited in the table may need an update.

Staff Response to California American Water – Comment 5

Central Coast Water Board staff recognizes that the water conservation efforts during the last decade or so have impacted the characteristics of domestic wastewater and the numbers cited in Table 1 of the draft General Permit. The concentrations in Table 1 reference USEPA documents from 1992 and 2005. Central Coast Water Board staff revised Table 1 to include more recently published concentrations sourced from *Wastewater Engineering Treatment Resource Recovery* (Tchobanoglous et. al., (2014) *Wastewater Engineering Treatment Resource Recovery*, Fifth Edition, Metcalf & Eddy/AECOM, McGraw-Hill Education, page 221, Table 3-18). Staff added language to the draft General Permit that acknowledges the increase in wastewater strength that has been seen in some communities due to water conservation efforts.

Change Made to the General Permit: Staff revised General Permit Table 1 and section II.A.11.

California American Water – Comment 6

Phenol is set at 0.1 ug/L in the Basin Plan for surface waters in the proposed permit. If beneficial uses for groundwater are to be considered, why does the General Permit set the Phenol 30-Day Average at 0.1 ug/L, which is ten times lower than the groundwater limit for phenol? Section 3.3.4.2 of the Basin Plan says “Ground waters shall not contain concentrations of organic chemicals in excess of the maximum contaminant levels for primary drinking water standards specified in California Code of Regulations, Title 22, Division 4, Chapter 15, Article 5.5, Section 64444, Table 64444-A.” Table 64444-A only shows pentachlorophenol (a phenol), which has a Drinking Water MCL of 0.001 mg/L, or 1.0 ug/L. No other phenolic compounds are listed in Table 64444-A. CAW requests the Regional Board to reevaluate the requirement.

Staff Response to California American Water – Comment 6

Central Coast Water Board staff acknowledge that the effluent limitations specified in Table 6 of the draft General Permit (that includes phenol) are surface water based. Central Coast Water Board staff have removed the corresponding effluent limitations in the proposed General Permit.

Change Made to the General Permit: Staff deleted draft General Permit Table 6.

California American Water – Comment 7

The “Chlorine Residual” in the proposed permit needs to be clearly defined as either Total Chlorine Residual or Free Chlorine Residual.

Staff Response to California American Water – Comment 7

Effluent limitations (including chlorine residual) specified in Table 8 of the draft General Permit will be specified in the State Water Board’s Division of Drinking Water title 22 conditional acceptance letter prepared for that specific Wastewater System.

Disinfection methods are known to vary between Wastewater Systems and some customization of the “Chlorine Residual” effluent limitations will occur. Typically, most recycled water producers monitor for free chlorine residual. However, there are some Wastewater Systems where recycled water producers will employ alternative disinfection methods that require analysis for total chlorine residual. The Central Coast Water Board will reiterate effluent limitations specified in the Division of Drinking Water title 22 conditional acceptance letter within the notice of applicability.

Change Made to the General Permit: None.

California American Water – Comment 8

Section V.A.3 – Effluent Limitations reference to Basin Plan Water Quality Objectives Table 3.6 with a footnote f: use Appendix A-32 (Salinas Groundwater Basin and Sub-Areas). CAW recommends the Regional Board make it explicit that if basins with shallow and deeper aquifers, the shallow aquifer Water Quality Objectives should apply unless the waste discharge is directly injected to the deeper aquifer.

Staff Response to California American Water – Comment 8

At the time of enrollment, Central Coast Water Board staff will review information provided in the Discharger’s application to (in conjunction with the Discharger) determine the location of a proposed discharge. A determination will be made regarding the groundwater basin that will receive the discharge and the aquifer within the basin that will receive the discharge.

Change Made to the General Permit: None.

California American Water – Comment 9

Section VI.C.2 of the proposed permit states: “If the Discharger does not comply, or will be unable to comply, with a limit related to effluent quality, pond freeboard, flow rate, the conditionally accepted title 22 Engineering Report requirements, or has bypass or overflow, the Discharger must notify Central Coast Water Board staff by telephone…Notification must occur as soon as the Discharger or its agents have knowledge of such noncompliance or potential for noncompliance, and the Discharger must confirm this notification in writing within five days. The written notification must state the date, time, nature, cause of noncompliance, immediate response action, and schedule for corrective actions.” CAW has the following comments and requests the

Regional Board modify the notification requirement language so that it is practical and consistent.

a. It is understandable that parameters which could cause an overflow (freeboard, flowrate, bypass) would be subject to an immediate notification. However, out of range Effluent WQ parameters such as pH or Turbidity could be handled by written report (monthly/ quarterly/ annual) notification only. Will lab-generated results be handled similarly? Does this imply that the Water Board would need immediate notification upon receipt of lab results, even when most lab analysis results lag actual WWTP conditions?

b. This seems to be very similar to Section VI.C.4 “Notification Requirements for the delivery of off-specification recycled water” which also requires telephone notification for the non-compliance, but then requires written follow-up within two weeks, not five days.

Staff Response to California American Water – Comment 9

In general, Central Coast Water Board staff agree that laboratory generated data or operational data (e.g., hand held probe data, non-laboratory data collected for system operations, etc.) that does not comply with the effluent conditions of the permit does not need to be reported “as soon as the Discharger or its agents have knowledge of such noncompliance or potential for noncompliance.” However, 2013 Standard Provisions and Reporting Requirements for Waste Discharge Requirements (Standard Provisions), section C.3., states “The discharger must report any noncompliance that may endanger health or the environment to the Central Coast Water Board orally within 24 hours from the time the discharger becomes aware of the circumstances (telephone: 805-549-3147). Unless waived by the Executive Officer of the Central Coast Water Board, a written report shall be submitted within five days of awareness and shall contain a description of the noncompliance and its cause; the period of noncompliance (including exact dates and times) or anticipated duration; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. This provision includes, but is not limited to, a. Violation of a discharge prohibition. b. Any "upset," "overflow," or 'bypass." c. Violation of a discharge limitation for any "hazardous substance."

With respect to requirements in Standard Provisions, if there is an effluent violation that “may endanger health or the environment to the Central Coast Water Board,” then a Discharger must inform the Water Board “orally within 24 hours from the time the discharger becomes aware of the circumstances.”

Staff removed the phrase “effluent quality” from the draft General Permit, section VI.C.2. Please note that the requirements in Standard Provisions remain in place.

Change Made to the General Permit: Staff revised General Permit section VI.C.2.

Cambria Community Services District – Comment 1

We are hoping to do some upgrades to our Cambria WWTP [Wastewater Treatment Plant] that should improve our process (equalization basin, sludge processing, aeration

basing baffles) but won't be increasing our capacity. Assuming we will need to enroll in this general permit, can we work out the timing to coincide with our upgrades. I'm anticipating 2 years for the upgrades to be completed.

Staff Response to Cambria Community Services District – Comment 1

See response to California American Water – Comment 2.

Change Made to the General Permit: Staff revised: General Permit section V.A, section V.A.3 (renumbered in the proposed General Permit as section V.A.2), and section VI.A.5; and Attachment D, General Monitoring and Reporting Program, section VII.A.

Cambria Community Services District – Comment 2

Also is there a time frame where you would want the Climate Change Adaptation Plan and Salt and Nutrient Management Plan to be completed.

Staff Response to Cambria Community Services District – Comment 2

The Climate Change Adaptation Plan must be submitted to the Central Coast Water Board 24 months after issuance of a notice of applicability.

The Salt and Nutrient Management Plan must be submitted only if a Discharger is directed to do so by the Central Coast Water Board Executive Officer. For additional information please refer to section VI.A.4, of the proposed General Permit.

Technical report submittal due dates are specified in General Monitoring and Reporting Program Table 10.

Change Made to the General Permit: None.

Cambria Community Services District – Comment 3

We currently do secondary effluent disposal to a percolation pond. The effluent percolates to help mitigate against sea water intrusion. Would we fall under section IV.B.3 pond systems, or under IV.C. Land Application? Our current disposal systems doesn't seem to fit those categories neatly.

Staff Response to Cambria Community Services District – Comment 3

Waste Discharge Requirements Permit No. 01-100 issued to the Cambria Community Service District, states there are 22 acres of spray disposal areas and evaporation/percolation ponds. According to your current permit and the disposal areas identified, the Cambria Community Service District must comply with both sections of proposed General Permit, section IV.B and section IV.C.

Change Made to the General Permit: None.

Wallace Group – Comment 1

Does the Regional Board envision that there is an upper ceiling of permitted flow capacity to this General Order? Can the timeline requirements for submission of new Application/ROWD for existing Dischargers be clarified?

Staff Response to Wallace Group – Comment 1

The proposed General Permit does not contain an upper limit for permitted flow.

Staff have analyzed the age of the existing individual permits as well as the reported water quality from each facility for the last 15 years. There are 12 Wastewater Systems with permits over 20 years old and an additional 20 facilities with permits that are over 10 years old. There are also many permits that do not reflect the operational and structural changes implemented by Dischargers since the individual permit adoption. After adoption of the proposed General Permit, Central Coast Water Board staff will begin the process of enrolling facilities into the General Permit. Staff will prioritize the oldest permits, the Wastewater Systems producing the worst water quality, the facilities that have had significant non-compliance with their existing permit, and facilities where the existing permit does not reflect current operations. Central Coast Water Board staff modified the language in the draft General Permit, section II.K to clarify that the application process applies to both new and existing Dischargers as both groups will be required to submit a report of waste discharge (application).

If the Discharger proposes to expand their facility, the Discharger must demonstrate to the Central Coast Water Board that they have complied with California Environmental Quality Act prior to enrollment in the proposed General Permit.

Change Made to the General Permit: Staff revised General Permit section II.K and added a footnote to section IV.A.2.ii.f.

Wallace Group – Comment 2

II.A.3. We suggest reference to the “collection system” be omitted in this paragraph, since the collection system would be regulated by Order 2006-0003-DWQ (Statewide General Waste Discharge Requirements for Sanitary Sewer Systems), referenced in Section II.I.

Staff Response to Wallace Group – Comment 2

The Statewide General Waste Discharge Requirements for Sanitary Sewer Systems Order 2006-0003-DWQ defines sanitary sewer systems as only those systems owned by public agencies that are comprised of more than one mile of pipes or sewer lines.

There may be Wastewater Systems that have flows consistent with the proposed General Permit that are not owned by public agencies. These same non-public agency Wastewater Systems may have collection systems and need to be incorporated into the proposed General Permit.

Change Made to the General Permit: None.

Wallace Group – Comment 3

Footnote 1, Page 6. We suggest adding “to land.” Following “…for a permitted discharge of wastewater”, so it reads “….for a permitted discharge of wastewater to land.”.

Staff Response to Wallace Group – Comment 3

Central Coast Water Board staff revised footnote 1 to add “to land”.

Change Made to the General Permit: Staff revised General Permit, section II.A.2, footnote 1.

Wallace Group – Comment 4

II.A.8. It is suggested that General Order 2016-0068-DDW also be referred to, should existing Dischargers already be permitted under this Order.

Staff Response to Wallace Group – Comment 4

The proposed General Permit allows for “the production and onsite use of recycled water (as defined in California Water Code section 13050(n)) and requires all recycled water production to comply with the applicable requirements described in California Code of Regulations, title 22, division 4, chapter 3, (title 22).” Under the proposed General Permit, “use” of recycled water is limited to the producer’s facility that has restricted public access. Should a recycled water producer choose to use recycled water offsite, that use is regulated under State Water Board General Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use. Central Coast Water Board staff revised section II.A.8 to add a reference to 2016-0068-DDW.

Change Made to the General Permit: Staff revised General Permit section II.A.8.

Wallace Group – Comment 5

Table 1. We suggest that the range of typical domestic wastewater BOD and TSS concentrations be revised to reflect what we have seen on the Central Coast for smaller communities with significant water conservation. We have seen typical influent BOD/TSS concentrations in the 350+ range, and as high as 400 to 450 mg/L as typical 24-hour composite results.

Staff Response to Wallace Group – Comment 5

Please see staff response to California American Water - Comment 5.

Change Made to the General Permit: Staff revised General Permit Table 1 and section II.A.11.

Wallace Group – Comment 6

II.B.2. The provision indicates additional monitoring may be required if the discharge has degraded surface water quality. We suggest that the last sentence be modified to indicate “Additional monitoring may be required by the Central Coast Water Board Executive Officer to address potential concerns of surface water degradation from discharge of treated effluent; such additional monitoring, if deemed necessary, will be incorporated into the Notice of Applicability.”

Staff Response to Wallace Group – Comment 6

Central Coast Water Board staff revised this finding to improve clarity. Please note that any monitoring changes would be incorporated into a revised monitoring and reporting program. The notice of applicability may also be revised if there are operation or structural upgrades to a Wastewater System.

Change Made to the General Permit: Staff revised General Permit section II.B.2.

Wallace Group – Comment 7

I.5, Disadvantaged Community Status, is under the heading “Other Regulatory Requirements”. Does being a DAC modify any of the General Order requirements presented? If so, we would recommend specifying what being a DAC means relative to this General Order.

Staff Response to Wallace Group – Comment 7

Being designated a disadvantaged community does not modify any of the proposed General Permit requirements. Staff revised the General Permit to indicate that being designated a disadvantaged community does make certain grant funds or loans accessible to these Wastewater Systems that serve these communities for the planning and implementation of actions to improve operations and upgrade the Wastewater Systems.

Change Made to the General Permit: Staff revised General Permit section II.I.5.

Wallace Group – Comment 8

II.K, Application Process. We suggest editing to make it clear that all existing and proposed municipal Dischargers (of 100,000 gpd capacity and larger) must submit a new ROWD. Also, clarification as to the timeline for submission of the new ROWD for existing permitted Dischargers would be helpful.

Staff Response to Wallace Group – Comment 8

Central Coast Water Board staff modified the language in the draft General Permit, section II.K to clarify that the application process applies to both new and existing Dischargers as both groups will be required to submit a report of waste discharge (application). Central Coast Water Board staff intends to enroll almost all the Wastewater Systems that currently have individual permits into this proposed General Permit. The exception with be those facilities that currently have permits for advanced, complex systems more suited to an individual permit (e.g., Pure Water Monterey).

Regarding a timeline for submission, please see staff response to Wallace Group - Comment 1.

Change Made to the General Permit: Staff revised General Permit section II.K.

Wallace Group – Comment 9

III.17. We suggest defining what “significant increase” in mineral concentrations entails, and how the Regional Board would derive such significance in TDS concentrations.

Also we suggest that it be clarified that the comparison samples will be collected from GW monitoring wells upgradient and downgradient of the disposal areas.

Staff Response to Wallace Group – Comment 9

In general terms, to determine "significant increase" can be viewed as a two-step process. In step one, through statistical data evaluation, there can be a determination of change and if that change is statistically significant at the 95 percent confidence level. As part of the statistical evaluation, one must list your assumptions of the statistical test you are using and then test your assumptions of your data. In step two, that change must be evaluated relative to a limit or water quality objective.

Staff revised the General Permit language to "statistically significant increase". Staff also revised section III to include the phrase "The following actions are prohibited:…Cause a statistically significant increase of mineral concentrations in underlying groundwater, as determined by comparison of samples collected from wells located upgradient and downgradient of the disposal area."

Change Made to the General Permit: Staff revised General Permit at the beginning of section III and section III.17.

Wallace Group – Comment 10

IV.A.5. We suggest that good faith effort include consideration of whether the Discharger deems such consolidation as infeasible.

Staff Response to Wallace Group – Comment 10

The draft General Permit, section IV.A.5 (now renumbered in the proposed General Permit as IV.A.6) states "For new or expanding Wastewater Systems within or nearby the boundaries of a centralized wastewater district or regional service area, the Discharger must demonstrate a good faith effort to connect to the centralized system and provide evidence that connection to the system was not approved." This requirement does not preclude the Discharger's consideration of a projects' feasibility.

Change Made to the General Permit: None.

Wallace Group – Comment 11

IV.A.9. The last sentence indicates use of holding tank chemicals must be discouraged. It is not clear how the Discharger can accomplish this goal. The Discharge would have the option to not accept such waste, and/or ensure that the amount of waste they do accept will not impact the WWTP and effluent quality of their regulated facility.

Staff Response to Wallace Group – Comment 11

Central Coast Water Board staff acknowledge that the proposed General Permit does not explicitly define how the Discharger must accomplish the goal of discouraging the discharge of chemicals from holding tanks into their Wastewater System. The lack of specificity is intentional, the proposed General Permit affords a Discharger the flexibility to develop a management program specific to their Wastewater System.

Change Made to the General Permit: None.

Wallace Group – Comment 12

IV.A.11.ii, Setbacks. Consider if DWR [Department of Water Resources] would need to also need to be involved in the approval process should setback criteria not be met.

Staff Response to Wallace Group – Comment 12

Yes, if setback criteria are not met, Central Coast Water Board staff will consult with the California Department of Water Resources, as appropriate.

Change Made to the General Permit: None.

Wallace Group – Comment 13

IV.C.1, Land Application. We suggest that if a land application field is for dedicated percolation disposal, that discharge to the permitted field should be allowed at any time, so long as ponding does not exceed 48 hours, and the 2 foot freeboard criterion is met at all times. We concur that application to saturated ground should not be allowed in instances when such application of water may exceed the agronomic update capability of the crop or nutrient uptake, and pose risk of runoff during wet weather.

Staff Response to Wallace Group – Comment 13

A new section has been added to the draft General Permit, section IV.D and this new section allows for application during precipitation events, allows ponding, and requires that 2-foot of freeboard is always maintained.

Change Made to the General Permit: Staff added new section IV.D to the General Permit.

Wallace Group – Comment 14

IV.C.7, application of recycled water. The context of this provision is not clear. This is a sub-provision of “Land Application”, which we would interpret to be “permitted land disposal”. If a Discharger is land applying treated effluent, then it must meet the effluent limitations specified, which could be lesser treatment than Title 22 recycled water in some cases.

Staff Response to Wallace Group – Comment 14

Central Coast Water Board staff deleted draft General Permit section IV.C.7.

Change Made to the General Permit: Staff deleted draft General Permit section IV.C.7.

Wallace Group – Comment 15

IV.D Sludge Disposal. We suggest this Section include the provision/requirement for the Discharger to prepare a Sludge Management Plan for approval by the Regional Board.

Staff Response to Wallace Group – Comment 15

Proposed General Permit section VI.A.2.ii contains the requirement for the preparation of a Sludge Management Plan.

Change Made to the General Permit: None.

Wallace Group – Comment 16

V.A, Effluent Limitations, option 1 and Table 7. We suggest the Regional Board consider allowing agronomic uptake (with corresponding engineering analysis) as a means of achieving the 10 mg/L total Nitrogen limitation as part of option 1, thus meeting the effluent limitation for nitrogen with no groundwater monitoring required.

Staff Response to Wallace Group – Comment 16

Central Coast Water Board staff are aware that in many land disposal systems utilized by Dischargers in the central coast region there is limited harvesting of the plant growth in the land disposal areas. Although there may be some nitrogen uptake by the plants in a typical land disposal area (e.g., the nitrogen load may initially be transferred from the applied wastewater to the plants), upon death of the plants some portion of that transferred nitrogen may no longer be bound in the decayed plant material and may become available for movement into the soil matrix and ultimately groundwater. Central Coast Water Board staff added footnote 14 to Table 7 (replaced by Table 6 and 7 in the proposed General Permit) that states that if a Wastewater System has data that shows the nitrogen loading associated with discharge to a land application area is reduced through agronomic uptake, the Executive Officer may approve an adjustment to the effluent limitations.

Change Made to the General Permit: Staff revised General Permit Table 6 and Table 7.

Wallace Group – Comment 17

V.A.3.i, Groundwater Monitoring. We suggest clarifying that should a Discharger choose Option 1, that a groundwater monitoring program is <u>not</u> required.

Staff Response to Wallace Group – Comment 17

Central Coast Water Board staff acknowledge that selection of option 1, in section V.A.3.i. (renumbered to section V.A.2.i in the proposed General Permit) implies that groundwater monitoring is not required. However, there may be instances where groundwater monitoring may be necessary for the protection of water quality.

Change Made to the General Permit: Staff revised draft General Permit section V.A.3.i. (renumbered to section V.A.2.i in the proposed General Permit).

Wallace Group – Comment 18

Table 3, Treatment Ponds. The BOD and TSS 30-day average and 7-day average concentrations may be difficult to meet, particularly during warmer months with significant algae production.

Staff Response to Wallace Group – Comment 18

Central Coast Water Board staff concur that for pond systems, operational and perhaps system upgrades may be necessary to meet the effluent limitations in Table 3 of the proposed General Permit.

Change Made to the General Permit: None.

Wallace Group – Comment 19

Attachment B, Permit Application Process, Step 4. Porter Cologne requires Regional Board to respond to Discharger within 30 days if ROWD is complete. Does this same timeline apply here (notice of applicability, or notice of incomplete application).

Staff Response to Wallace Group – Comment 19

Central Coast Water Board staff will notify a proposed Discharger within 30 days of receipt of the application whether the application is complete. If the application is incomplete, Central Coast Water Board staff will provide the Discharger with a list of the specific information needed to complete the application process.

Change Made to the General Permit: None.

Wallace Group – Comment 20

Pretreatment Requirements. If it is confirmed that a pretreatment program is required for facilities under 5MGD, will an Industrial Waste Survey be required if these facilities are currently implementing an existing pretreatment program? What are the protocols for having an existing program approved?

Staff Response to Wallace Group – Comment 20

Central Coast Water Board staff will work with a Discharger to determine if an Industrial Waste Survey will be required regardless if a Wastewater System is implementing an existing pretreatment program.

There is not a pre-determined set of protocols. Items to consider include: 1) is an existing Wastewater System producing effluent protective of water quality and associated beneficial uses? 2) is the Wastewater System effluent being negatively impacted by industrial discharges into the Wastewater System?

Change Made to the General Permit: None.

Wallace Group – Comment 21

Settleable Solids. Can facilities who are not ELAP Certified perform Settleable Solids tests “in house” for purposes of monthly self-monitoring report submittal if they perform this test following a Standard Operating Procedure with semi-annual training documentation?

Staff Response to Wallace Group – Comment 21

Facilities that are not Environmental Laboratory Accreditation Program (ELAP) accredited can perform settleable solids tests “in house” for operational purposes. The proposed General Permit (General Monitoring and Reporting Program section VII.A.2.i Sampling and Analysis Plan) specifies that the Discharger must include standard operating procedures for measuring settleable solids at the wastewater treatment plant. Additionally, the Discharger is required to submit a subset of samples at the frequency

specified in the General Monitoring and Reporting Program to an Environmental Laboratory Accreditation Program accredited laboratory for compliance purposes.

Change Made to the General Permit: None.

Wallace Group – Comment 22

Field Test Instruments p D-2. Please clarify – will WWTP facilities who are not ELAP certified be allowed to conduct tests such as pH, and Dissolved Oxygen for reporting purposes if they utilize the same type of equipment also utilized by ELAP certified labs, as long as they follow protocols 1-4 listed in this section?

Staff Response to Wallace Group – Comment 22

Yes. The General Monitoring and Reporting Program section I specifies that field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used if they are used by a State Water Board Environmental Laboratory Accreditation Program accredited laboratory, or:

1. The user is trained in proper use and maintenance of the instruments;

2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;

3. Instruments are serviced and/or calibrated by the manufacturer at the recommended frequency; and

4. Field calibration reports are maintained and available for at least three years.

Change Made to the General Permit: None.

Cypress Ridge Limited Partnership – Comment 1

Our concern is additional testing that is required for factors that a wastewater plant cannot control. How the plant operates directly affects water quality attributes such as Biochemical Oxygen Demand, Total Suspended Solids, Total Nitrogen, Settleable Solids, and pH. Testing for Phenol, Formaldehyde, Zinc, Boron, and Sulfate add cost to operate the plant and normal operations have no affect on those values.

The cost for Table 6 constituents from Abalone Analytical Labs is:

Oil and Grease	$80
Phenol	$80
Formaldehyde	$300
Zinc	$80

With those being listed at 30 day averages, testing once a month results in $6,480 a year.

Focus on testing that adds value to the operations of the wastewater plant to produce better groundwater rather than monitoring numbers that operators cannot affect.

Staff Response to Cypress Ridge Limited Partnership – Comment 1

See staff response to the City of Guadalupe - Comment 1.

Change Made to the General Permit: None

City of Greenfield – Comment 1

Regarding Option 1 effluent limitations (listed in Table 7), if a Discharger elects to treat wastewater in compliance with the Table 7 parameters, and the existing background local groundwater quality (at the effluent disposal site) is impaired and does not meet the Table 7 parameters, will the Regional Board allow the facility to operate/discharge without requirements for long-term groundwater monitoring?

Staff Response to City of Greenfield – Comment 1

If a Discharger selects option 1 and complies with the effluent limits, groundwater monitoring will not be required unless the Executive Officer determines the discharge may impact beneficial uses. Staff added clarification to the General Permit option 1 language.

Change Made to the General Permit: Staff revised draft General Permit section V.A.3.i. (renumbered to section V.A.2.i in the proposed General Permit).

City of Greenfield – Comment 2

If the Discharger elects to employ Option 2, and the above local (impaired) groundwater quality conditions exist, how will the Regional Board view Discharger compliance with the General Order under this scenario?

Staff Response to City of Greenfield – Comment 2

The General Permit requires the discharge to not cause the underlying groundwater to exceed the water quality objectives set forth in the Basin Plan or unreasonably impact the beneficial uses of the groundwater. The General Monitoring and Reporting Program states that the number of wells and location of the groundwater monitoring well network must be on a scale sufficient to determine impacts, if any from the Wastewater System, and be sufficiently representative of groundwater conditions upgradient and downgradient of the permitted disposal/dispersal area. If the Discharger is unable to determine the influence of their wastewater discharge versus the influence of surrounding land practices, the Discharger may need to make modifications to the existing groundwater monitoring program (e.g., install additional groundwater monitoring wells, add tracer compounds representative of wastewater discharges [e.g., caffeine, etc.] to the analytical testing program, use stiff and piper diagrams to evaluate whether a receiving water is under the influence of a specific discharge, etc.).

Change Made to the General Permit: Staff revised General Permit section V.C.

City of Greenfield – Comment 3

Also regarding the Option 1 treatment option, will the Regional Board consider allowing agronomic uptake (with corresponding engineering analysis) as a means of achieving

the 10 mg/L total Nitrogen limitation as part of Option 1 (thus meeting the effluent limitation for nitrogen with no groundwater monitoring required)?

Staff Response to City of Greenfield – Comment 3

See staff responses to Wallace Group - Comment 16.

Change Made to the General Permit: Staff revised draft General Permit Table 7 and replaced it with Table 6 and Table 7 in the proposed General Permit.