

**PROPOSED ORDER R3-2024-0045  
COMMENTS AND STAFF RESPONSES**

During the 30-day public comment period, the Central Coast Water Board received written comments on draft Order R3-2024-0045 from Monterey One Water. Staff responses to these comments are provided below. All comments are direct transcriptions from the comment letters.

**Monterey One Water – Comment 1**

*Attachment E, Table E-12, Recycled Water Monitoring (page E-22)*

The Salinas Valley Reclamation Plant (SVRP) produces disinfected tertiary recycled water for agricultural irrigation and other non-potable uses. Consistent operational practices and weekly monitoring results collected during the current permit term demonstrate reliable and excellent performance. To lower analytical costs and save staff resources, please consider reducing BOD and TSS monitoring at REC-001 to monthly and remove the settleable solids monitoring requirements at REC-001. This monitoring is not required by Title 22 Water Recycling Criteria and instantaneous monitoring of other parameters, including, but not limited to, flow, turbidity, chlorine residual, and contact time are the key operational parameters for ensuring high quality recycled water is reliably produced.

<b>Staff Response to Monterey One Water – Comment 1</b>
Central Coast Water Board staff agrees with the suggested change. The monitoring frequency of total non-filterable residue (suspended solids) and biochemical oxygen demand (BOD) at monitoring location REC-001 can be reduced to monthly, and the settleable solids monitoring requirement can be removed. The previous order for Monterey One Water’s (Discharger) regional wastewater treatment plant and Advanced Water Purification Facility (Facility), R3-2017-0018 and proposed Order R3-2024-0045 include monitoring at REC-001 for parameters required by Title 22 Water Recycling Criteria, such as chlorine residual, chlorine contact time, total coliform, and turbidity (REC-002). As an additional layer of quality assurance, Order R3-2018-0017 included additional requirements not required by Title 22, including for TSS, BOD, and settleable solids. Robust monitoring data collected at REC-001 during the past permit term suggests that the recycled water produced at the SVRP is high quality and consistently meets effluent limits. Central Coast Water Board staff, in coordination with Division of Drinking Water staff, agree that additional monitoring not required by Title 22 can be removed and/or reduced.
Change Made: At monitoring location REC-001, TSS and BOD monitoring is reduced from weekly to monthly and settleable solids monitoring is removed. (Note the effluent limits for TSS and BOD at REC-001 remain.)

## Monterey One Water – Comment 2

*Attachment F, Table F-21, Effluent Limitations for Radioactivity (page F-49)*

The Ocean Plan includes CCR Title 17 requirements for protection from radiation exposure. For consistency and accuracy, please revise the regulations cited in Table F-21 to reference CCR Title 17 instead of CCR Title 22 requirements. In addition, please clarify the numerical limits intended by the reference to 17 CCR § 30253.

### **Staff Response to Monterey One Water – Comment 2**

Central Coast Water Board staff agrees with the suggested change.

Regarding clarification of numerical limits intended by the reference to Title 17, Division 1, Chapter 5, Subchapter 4, Group 3, Article 3, section 30253 of the California Code of Regulations, this section incorporates by reference Title 10, Code of Federal Regulations, part 20. Appendix B to 10 CFR 20 includes effluent concentrations for radiation, which can be viewed online at:

<https://www.ecfr.gov/current/title-10/chapter-I/part-20/appendix-Appendix%20B%20to%20Part%2020>

Change Made: The effluent limit in Table F-21 for radioactivity has been updated to reference 17 CFR §30253. This language is consistent with the California Ocean Plan.

## Monterey One Water – Comment 3

*Attachment E, 5.3.3 Species Sensitivity Screening (page E-19)*

M1W completed species screening for the new NPDES permit in February and July 2023. *M. pyrifera* was identified as the most sensitive species using the current low Dm (145) and high Dm (473) which are similar to the Dms that will be implemented in the new permit. Please consider modifying the language in Attachment E, Provision 5.3.3 to allow use of the 2023 sensitivity species screening results in the new NPDES permit until there is a significant change to the nature of the effluent that will be discharged.

### **Staff Response to Monterey One Water – Comment 3**

Central Coast Water Board staff agrees with the suggested change. Because the most-recent species sensitivity test took place relatively recently and the nature of the discharge has not changed, Monterey One Water may continue to use the results of the species sensitivity screening from February and July 2023. Monterey One Water is required to conduct a new species sensitivity screening when the flow of reverse osmosis concentrate is increased as part of the Pure Water Monterey expansion.

Change Made: Monitoring and Reporting Program Section 5.3.3.1 has been updated to clarify that Monterey One Water may continue to use the results from the February and July 2023 species sensitivity screening until there is a significant change in the nature of the effluent. This change includes, but is not limited to, conditions when the flow of reverse osmosis concentrate from the Advanced Water Purification Facility (AWPF) is increased above historic discharge rates previously authorized under R3-2018-0017. When there is a significant change in the nature of the effluent discharge, the discharger must perform species sensitivity screening one time for the low and high concentrate waste dilution scenarios when effluent Dms of 145 and 453 apply.

#### Monterey One Water – Comment 4

##### 4.1.1.4 Bacteria Effluent Limits (page 17)

Please remove the reference to total coliform in Provision 5.3.3 since there are no effluent limits in the draft permit for total coliform. The correction is shown below.

4.1.1.4 Bacteria. The following ~~total coliform~~, fecal coliform, and enterococcus effluent limits apply at Discharge Point 001 (with compliance measured at Monitoring Location EFF-001B).

#### Staff Response to Monterey One Water – Comment 4

Central Coast Water Board staff agrees with this suggested change. There is no effluent limit for total coliform.

Change Made: Removed total coliform from Section 4.1.1.4.

#### Monterey One Water – Comment 5

*Attachment E, Table E-14, Shoreline Bacteria Monitoring Schedule, Footnote [3] (page E-24). Table E-14,*

Footnote [3] requires additional sampling in Monterey Bay if any bacteriological single sample maximum (SSM) exceeds the SSM standards specified in the receiving water limitations (Provision 5.1.1. of the Order). The samples must be collected “immediately inshore of 30-foot contour sites” concurrent with 30-foot contour repeat sampling. M1W requests time to identify a representative location for inshore sample collection that will have safe access and will be outside of the Salinas River plume. Please consider including a requirement that allows M1W one year to select an appropriate monitoring location and submit a formal proposal to the Regional Water Board for review and approval.

**Staff Response to Monterey One Water – Comment 5**

This language, which pertains to repeat sampling requirements in the receiving water when the single sample maximum bacteriological standard is exceeded, was also present in the previous order (see footnote 3 of Table E-17, Triggered Shoreline Bacteria Monitoring Schedules) and is necessary with determining compliance with Ocean Plan water-contact objectives for bacteria. The Ocean Plan stipulates that bacteria water-contact objectives be met throughout the water column within a zone bounded by the shoreline and a distance of 1,000 feet from the shoreline or the 30-foot depth contour, whichever is further from the shoreline, and in areas outside this zone used for water contact sports. Staff encourages Monterey One Water to select appropriate monitoring locations in coordination with the Central Coast Water Board; however, staff cannot authorize that the Discharger have a year to select appropriate monitoring locations as this is an existing requirement put in place with the previous order and is necessary to determine compliance with the Ocean Plan.

Change Made: None

**Monterey One Water – Comment 6**

*Attachment E, Table E-7, Effluent Monitoring at EFF-001B (page E-13)*

Please include Footnote [6] for all constituents that demonstrated Reasonable Potential using Best Professional Judgement and have 4/year minimum sampling frequency.

**Staff Response to Monterey One Water – Comment 6**

Central Coast Water Board staff agrees with this suggested change. Footnote 6, which requires the Discharger ensure sampling is conducted at least once for each each Dm (e.g. 145, 248, 368, and 453) across the permit term, and footnote 7, which establishes a pathway for the Central Coast Water Board and Monterey Bay National Marine Sanctuary to reduce sampling frequency from four to two times per year, should apply to all pollutants that demonstrated reasonable potential through best professional judgment (Ocean Plan at p. 99, Appendix VI, Steps 2 and 13) and have a monitoring frequency of 4/year. As such, Monterey One Water must ensure that sampling is conducted so that each of the four Dms is represented by at least one sample across the permit term and, after the first year, may request that the sample frequency be reduced to semiannually during days where certain Dms, specified by the Central Coast Water Board, apply.

Changes Made: In Table E-7, Effluent Monitoring at EFF-001B, footnote 6 was added to Ocean Plan Table 3 Metals and footnote 7 was added to cyanide.

### Monterey One Water – Comment 7

*Attachment F, 2.4 Compliance Summary (page F-16)*

Please add context to the violation summary to explain the conditions that were present when the heptachlor violation occurred. During that time, the Pajaro Valley was experiencing extreme flood conditions which inundated that communities' wastewater collection system. To prevent contamination of homes and businesses by wastewater and polluted flood waters in that community (outside of M1W's service area), M1W accepted trucked wastewater with significant inflow and infiltration of flood water for treatment at the RTP. In addition, the City of Salinas requested M1W divert Salinas River flood waters mixed with treated industrial wastewater effluent from the Salinas Industrial Wastewater Treatment Facility. While the reason for the heptachlor exceedance cannot be attributed with 100% certainty, the extra sources of influent received during this challenging time were a contributing factor.

<b>Staff Response to Monterey One Water – Comment 7</b>
Central Coast Water Board staff acknowledges the extreme conditions in the winter of 2023 that caused catastrophic flooding throughout northern Monterey County. Staff understands that Monterey One Water accepted new source waters of unknown quality from outside of their service area to protect human health, homes, and businesses in a disadvantaged area under emergency conditions.
Change made: Context surrounding extreme weather and flooding conditions added to Fact Sheet Section 2.4, Compliance Summary.

### Monterey One Water – Comment 8

*Attachment E, Table E-4, Effluent Monitoring at EFF-001, Footnote (14) (page E-11)*

The IHVWS technique is not appropriate for processing 24-hour composite samples. The CCLEAN monitoring requirements for M1W effluent (Table E-15) specify collection of 30-day flow proportioned samples and the IHVWS technique is the appropriate tool under those conditions. The following change is requested for Footnote [14].

*{14} In order to collect representative samples, 24-hour composite samples may be collected to monitor Ocean Plan and Remaining Priority Pollutants. All PCB congeners shall be reported in addition to Aroclors. ~~The Discharger shall utilize the integrative high volume water sampling (IHVWS) such as SPMD or those deployed by CCLEAN monitoring obligations.~~*

<b>Staff Response to Monterey One Water – Comment 8</b>
Central Coast Water Board staff acknowledges that the IHVWS may not always be the optimal tool for 30-day flow proportioned monitoring and agrees with the suggested edits to remove prescriptive sampling methodology.

Change Made: The text specifying that the Discharger shall utilize integrative high volume water sampling (IHVWS) such as SPMD or those deployed by CCLEAN monitoring obligations was removed in Table E- 4, footnote 14.