

## **PROPOSED ORDER R3-2026-0014 COMMENTS AND STAFF RESPONSES**

During the public comment period, the Central Coast Water Board received written comments on draft Order R3-2026-0014 from the South County Regional Wastewater Authority (SCRWA). Staff responses to those comments are provided below. The comments below are direct transcriptions from the comments submitted as comments within a word document. Staff responses added context if comment description was unclear.

### **SCRWA - Comment 1**

Order section 4.1.1. “This edit is requested to make it very clear that these only apply during discharge to Pajaro River, which is important because effluent monitoring will occur annually when not discharging to the river.”

#### **Staff Response to SCRWA - Comment 1**

Central Coast Water Board staff agree with the requested clarification. Because the proposed Order is structured around seasonal or noncontinuous discharge to the Pajaro River, the order should clearly distinguish requirements that apply during discharge from requirements that apply when there is no discharge. Clarifying this point improves implementation and reduces avoidable reporting confusion without reducing protection of water quality.

Change Made: Added clarifying statement “When discharging to the Pajaro River” in Order section 4.1.1 to state that the identified effluent limits apply during discharges to the Pajaro River.

### **SCRWA - Comment 2**

Order section 4.1.1, Table 2. “TDS, chloride, sodium, sulfate, and boron are noted to be 12-month running means in Attachment F 4.3.6.9. It would be appropriate to remove these limits from the table and include them below the table as 12-month running mean limits to avoid confusion regarding the compliance period. Language can also be added to the Compliance Determination section to clarify these limits.”

#### **Staff Response to SCRWA - Comment 2**

Central Coast Water Board Central staff disagrees with the requested change. The previous Order expressed these TDS, chloride, sodium, sulfate, and boron effluent limitations as monthly average limits, and the proposed Order retains those limits on the same compliance basis. Revising the limitations to a 12-month running mean would be less stringent than the comparable limits in the previous Order because compliance could be achieved despite individual months exceeding the retained monthly average values. Under Clean Water Act section 402(o) and 40 C.F.R. section 122.44(l), limits generally may not be renewed, reissued, or modified to become less stringent than comparable limits in the previous Order unless a specific anti-backsliding exception applies. Staff does not find such an exception here. Accordingly, the salinity-related limits remain monthly average limits rather than 12-month running mean limits.

Change Made: No change to the effluent limits. However, Fact Sheet section 4.3.6.9 and related Fact Sheet discussion were revised to clarify that the retained average monthly effluent limits were carried forward from the previous Order and to remove inconsistent references to a 12-month running mean.

### **SCRWA - Comment 3**

Order section 4.1.6.1. "Title 22 limits are based on most probable number (MPN) per 100 mL."

#### **Staff Response to SCRWA - Comment 3**

Central Coast Water Board staff agree. Title 22 bacteria criteria and the standard reporting convention for these analyses are stated as MPN per 100 mL. Revising the proposed Order language from "organisms/100 mL" to "MPN/100 mL" is a terminology and units clarification that aligns the proposed Order with title 22 and with ordinary laboratory reporting practice. The revision does not change the numeric bacteria criterion or the underlying disinfection requirement.

Change Made: Revised the affected bacteria limit language to use MPN/100 mL rather than organisms/100 mL in Order sections 4.1.6.1, 4.1.6.2, and 4.1.6.3 and sections 4.4.4.1.6.1, 4.4.4.1.6.2, and 4.4.4.1.6.3 of the Fact Sheet.

#### **SCRWA - Comment 4**

Order section 6.3.4.2. “It is requested that this be removed from the Construction, Operation, and Maintenance Specifications as this requirement is already included in Discharge Prohibition 3.4, so SCRWA would effectively be penalized twice if there was a violation of these thresholds. Including the provision here provides no additional protection of water quality than currently provided with the Discharge Prohibition.”

#### **Staff Response to SCRWA - Comment 4**

Central Coast Water Board staff disagree with the requested deletion. The proposed Order intentionally retains both instances describing the conditions of discharge. The discharge prohibition states the operative restriction, while the construction, operation, and maintenance specifications provide additional implementation detail needed to operate the facility consistently with that restriction. The language in the construction, operation, and maintenance specifications is not duplicative; rather, it gives further detail on how the facility is to be constructed, operated, and maintained to comply with the discharge conditions. Retaining both provisions improves clarity and enforceability and does not create an improper double penalty, because any enforcement action would be based on the applicable permit requirement and the underlying facts of noncompliance.

Change Made: No Change.

#### **SCRWA - Comment 5**

Attachment E section 1.9. “The SWRCB sends letters annually to permittees reminding them to submit the DMR-QA study results. This letter states the following: “The permittee shall submit the results of the DMR-QA Study or the results of the most recent WP Performance Evaluation Study to the State Water Board Quality Assurance Officer (State Water Board QA Officer) at [QualityAssurance@Waterboards.ca.gov](mailto:QualityAssurance@Waterboards.ca.gov).” Therefore, this section should be revised to communicate that the results can be submitted by email.”

#### **Staff Response to SCRWA - Comment 5**

Central Coast Water Board staff agree. The order should reflect current State Water Board practice for DMR-QA submittals. Allowing submittal by email to the State Water Board Quality Assurance Officer improves clarity and aligns the proposed Order with current instructions.

Change Made: Revised the reporting language to state that DMR-QA results are submitted electronically to the State Water Board Quality Assurance Officer at the [QualityAssurance@Waterboards.ca.gov](mailto:QualityAssurance@Waterboards.ca.gov) email address.

### **SCRWA - Comment 6**

Attachment E, table E-2. "Edit to be consistent with Table E-3."

#### **Staff Response to SCRWA - Comment 6**

Central Coast Water Board staff agree.

Change Made: Revised the identified table heading to match Table E-3.

### **SCRWA - Comment 7**

Attachment E, Table E-3, footnote 1. "For months lacking any river discharge, this footnote requires an effluent flow value to be reported for each day. Flow would thus be the only parameter included in the uploaded PET tool and the value would be 0 MGD for every day. Rather than upload a PET tool just to report 0 MGD, SCRWA believes it sufficient to only report flow when there is an actual discharge to the river. SCRWA would appreciate just providing a cover letter indicating there was no discharge within the month. The edits here would accommodate this request."

#### **Staff Response to SCRWA - Comment 7**

Central Coast Water Board staff agree.

Change Made: Footnotes 2,3, and 4 of Table E-3 were revised adding clarification for the no discharge condition reporting. In addition, the word "monitoring" was added to Footnote 1 for clarification.

### **SCRWA - Comment 8**

Attachment E, section 5.1.1. "This sentence from Section III.C.4 (p 19) of the Toxicity Provisions is requested to accommodate a situation where SCRWA may conduct a routine test, but stop discharging before an MMEL test can be completed. This is important because the Toxicity Provisions would not hold SCRWA in violation if they

failed to collect a routine or MMEL test if there was no effluent available for the test. It would be appropriate for the NPDES permit to incorporate this allowance.”

#### **Staff Response to SCRWA - Comment 8**

Central Coast Water Board staff agree in part. Staff agree the permit should clarify that SCRWA is not required to complete a routine monitoring test or MMEL compliance test when no effluent is available to complete that test. This clarification is consistent with the statewide Toxicity Provisions language and is appropriate to address situations where discharge stops before a triggered follow-up test can be completed.

Staff also find it necessary to clarify that this allowance does not remove the separate requirement to conduct routine chronic toxicity monitoring of the effluent that is permitted to discharge to the Pajaro River, even if no discharge to the Pajaro River occurs. Section 5.1.1 of Attachment E requires routine chronic toxicity testing at least once per Period of Authorized Discharge, even if there is no discharge to the Pajaro River.

Change Made: Add clarifying sentence in the toxicity monitoring provisions in section 5.1.1 of Attachment E: “As specified in Section III.C.4 of the Toxicity Provisions, when there is no effluent available to complete a routine monitoring test or MMEL compliance test, the test shall not be required, and routine monitoring continues at the frequency specified in the permit. This allowance does not relieve the Discharger of the requirement to conduct routine chronic toxicity monitoring at the frequency specified in this Order, including at least once per Period of Authorized Discharge.”

#### **SCRWA - Comment 9**

Attachment E, section 5.1.7. “Although the provisions do not require this, we can try to accommodate the Board’s request by testing for the monthly and quarterly parameters within the same week as the sensitivity screening. This edit is relevant because the fathead minnow and Ceriodaphnia dubia tests require 3 samples collected throughout the week, and scheduling concurrent chemical testing would be more feasible if it could be conducted within the same week.”

#### **Staff Response to SCRWA - Comment**

Central Coast Water Board staff appreciates the comment’s acknowledgement that it is important, where practicable, to coordinate collection of the monthly or quarterly parameters with the species sensitivity testing. Staff disagrees with the requested

revisions as the existing language does not prevent coordinated implementation where practicable. The Discharger is directed to collect a single effluent sample to initiate and concurrently conduct the species sensitivity tests, and it is that sample which was targeted for collecting the parameters in Table E-2. Staff also understand the practicable concerns underlying the request: the species sensitivity testing described here is logistically demanding.

Change Made: No Change.

### **SCRWA - Comment 10**

Attachment E, section 8.1.2, table E-5. "Fecal coliform discharge prohibition and total coliform effluent limitations apply at the end-of-pipe. Therefore, monitoring for these constituents in the receiving water isn't necessary to determine compliance with these requirements. Further, both fecal coliform and total coliform are present in nature from other sources that do not undergo the rigorous treatment and disinfection processes utilized at the facility."

#### **Staff Response to SCRWA - Comment 10**

Central Coast Water Board staff disagree with the request to remove receiving water monitoring for total coliform and fecal coliform from Table E-5 of Attachment E. Although the proposed Order applies total coliform effluent limitations at Discharge Point 002 and prohibits the discharge of fecal coliform bacteria originating from human sources to the Pajaro River, staff finds that receiving water monitoring is necessary to provide upstream and downstream receiving water context during discharge events.

Change Made: No change to monitoring requirements. Attachment F, section 5.1.1.20 was updated to clarify the justification and Attachment F, section 7.4.1, has been updated as discussed in Comment 28.

### **SCRWA - Comment 11**

Attachment E, section 8.1.2, table E-5. "Edit to be consistent with Table E-3."

#### **Staff Response to SCRWA - Comment 11**

Central Coast Water Board staff agree. The request was made for a table header in Table E-5, to align with table headers used in Table E-3. Staff finds that this requested

revision is appropriate and using consistent language also reduces the risk of later confusion in implementation, self-monitoring, and reporting, particularly where operators and reviewers rely on the tables as the primary compliance reference.

Change Made: Revised the identified table heading in Table E-5 to match Table E-3.

### **SCRWA - Comment 12**

Attachment E, section 8.1.2, table E-5. “As the discharge season is Nov-Apr (total of 6 months), it would be more appropriate to require 2 per discharge season (1 per three months, which is equivalent to one quarter duration). One event could occur Nov-Jan and the second event could occur Feb-Apr rather than once per calendar quarter. Were SCRWA held to monitoring during standard calendar quarters, 3 sampling events could be required throughout the Nov–April discharge season if discharge were to occur in each calendar quarter. Some options to address this could be to include:2/year in the table with a footnote once per 3 months with a table footnote, or define the quarters as Nov-Jan and Feb-Apr. To accommodate this request, we have proposed Footnote 10 (below) to define the quarters specifically for receiving water monitoring.”

#### **Staff Response to SCRWA - Comment 12**

Central Coast Water Board staff disagree with the requested change in defining quarters and frequency. The request would reduce the potential monitoring frequency that could occur during a discharge season. Although a calendar-quarter framework can, in some cases, result in three sampling events during the November through April season, the existing quarterly frequency is appropriate because receiving-water monitoring is already conditioned on discharge occurrence. Staff does not revise the frequency because the current quarterly structure provides a more complete seasonal record and avoids reducing the minimum monitoring record in years where discharge occurs across multiple calendar quarters.

Change Made: No Change

### **SCRWA - Comment 13**

Attachment E, section 8.1.2, table E-5. “It’s requested to change the CTR pollutants, 2,3,7,8-TCDD equivalent, and Title 22 Pollutants sample type to grab as [it] is very difficult, and not currently possible, to collect a 24-hour composite sample of Pajaro

River. As an example, the Paso Robles NPDES permit only requires grab sample of the receiving water.”

#### **Staff Response to SCRWA - Comment 13**

Central Coast Water Board staff agree. Grab sampling is the practical and regionally consistent approach for river receiving-water characterization in this setting, and a 24-hour composite receiving-water sample is not reasonably achievable for the Pajaro River.

**Change Made:** Revised the receiving-water sample type to grab for CTR pollutants, 2,3,7,8-TCDD equivalent, and Title 22 pollutants in Table E-5 of Attachment E. Footnote 8 was revised and footnote 9 was removed to remove references to 24-hour composite sampling.

#### **SCRWA - Comment 14**

Attachment E, section 9.1, table E-6. “Edit to be consistent with 40 CFR 503.16.”

#### **Staff Response to SCRWA - Comment 14**

Central Coast Water Board staff agree that the biosolids monitoring frequency in Table E-6 in Attachment E should match the applicable tier in 40 CFR section 503.16. The error in the third line of the table with the range stating 1,200 – 15,000 dry metric tons instead of 1,500 – 15,000 dry metric tons specified in 40 CFR section 503.16 will be corrected.

**Change Made:** Text in Table E-6 in Attachment E was updated for specifying biosolids monitoring frequency to match 40 CFR section 503.16.

#### **SCRWA - Comment 15**

Attachment E, section 9.1, table E-6, footnote 3. “The 2017 permit states, “If the Discharger’s biosolids are directly land applied without further treatment by another preparer, biosolids shall also be tested for organic-N, ammonium-N, and nitrate-N at the frequencies required.” It’s requested that the beginning part of this sentence be retained as the WWTRF’s biosolids are transferred to Synagro.”

### **Staff Response to SCRWA - Comment 15**

Central Coast Water Board staff agree. Retaining the introductory phrase from the 2017 Order in Table E-6 of Attachment E is appropriate because it preserves the distinction between biosolids directly land applied by the Discharger and biosolids transferred to another preparer for further handling. That distinction remains relevant to the facility's current practice and avoids implying that the same direct-land-application nitrogen monitoring obligation applies in transfer scenarios.

**Change Made:** Footnotes to Table E-6 in Attachment E were updated with the language in the 2017 Order, "If the Discharger's biosolids are directly land applied without further treatment by another preparer," clarifying the nitrogen monitoring requirement to biosolids directly land applied without further treatment.

### **SCRWA - Comment 16**

Attachment E, section 9.1.1. "The 2017 permit states, "Prior to land application, the Discharger shall demonstrate that the biosolids meet Class A or Class B pathogen reduction levels by one of the methods listed in 40 CFR 503.32 (unless transferred to another preparer who demonstrates pathogen reduction)." It's requested that the parenthetical be retained as the WWTRF's biosolids are transferred to Synagro."

### **Staff Response to SCRWA - Comment 16**

Central Coast Water Board staff agree.

**Change Made:** Parenthetical clarification consistent with 40 CFR 503.32 has been returned in Attachment E section 9.1.1.

### **SCRWA - Comment 17**

Attachment E, section 9.1.1. "This was previously proceeded with "The following applies when biosolids from the Discharger are directly land applied as Class B, without further treatment by a second preparer". It's requested that this language be retained as the WWTRF's biosolids are transferred to Synagro."

### **Staff Response to SCRWA - Comment 17**

Central Coast Water Board staff agree. Although the sentence is not independently necessary to establish the underlying legal duty, it improves readability and implementation of section 9.1.1 of Attachment E by clarifying the circumstance in which the following Class B pathogen-reduction monitoring and recordkeeping requirements apply. This is consistent with the structure of the biosolids provision, which separately addresses biosolids transferred to another preparer who demonstrates pathogen reduction.

Change Made: Sentence was added back to section 9.1.1 of Attachment E.

### **SCRWA - Comment 18**

Attachment E, table E-7. "This table implies that this is all the biosolids monitoring required. However, this does not seem to align with the preceding text, which discusses additional monitoring requirements which are not captured in this table. SCRWA requests that this table include all applicable biosolids monitoring requirements listed above. Further, if 40 CFR 503 is going to be included in this NPDES permit, it's requested that the requirements in this NPDES permit reflect the requirements of 40 CFR 503 as they should apply to the facility. For example, this table notes a minimum sampling frequency of 1/year but 40 CFR 503 indicates once every 60 days. 1/year would make SCRWA not compliant with 40 CFR 503. Having conflicting requirements makes it difficult for SCRWA to implement their permit and comply with all regulations. Please also refer to this table in the preceding text as is done for the other monitoring tables."

### **Staff Response to SCRWA - Comment 18**

Central Coast Water Board staff agree in part. While it would be preferred that all biosolids monitoring requirements exist in one table, that is not the case; the Discharger may be required to complete other biosolids monitoring described in sections 9.1.1 to 9.1.6 of Attachment E. Also, staff recognized that having Table E-7 in Attachment E in closer proximity to the text requirements in section 9.1 and including a reference would make it clearer that both the text in sections 9.1.1-9.1.6 and Table E-7 of Attachment E specify required monitoring.

Central Coast Water Board staff agree that the frequency of monitoring for Table E-7 was confusing. For improved clarity, staff has reference Table E-6 in Table E-7 for the minimum frequency monitoring schedule based on biosolids volume. With the change in Table E-7 for frequency of monitoring, it was found that required monitoring for

priority pollutants was described in more clarity in section 9.1.3 of Attachment E and therefore they were removed from Table E-7 of Attachment E.

Change Made: Table E-7 was moved from section 9.4 in Attachment E to section 9.1 in Attachment E and an explanation that both the table and sections 9.1.1 to 9.1.6 of Attachment E require monitoring of biosolids. Monitoring Frequencies in Table E-7 in Attachment E have been updated to reference Table E-6 for the minimum frequency based on the volume of biosolids produced, and priority pollutants were removed from Table E-7 of Attachment E.

### **SCRWA - Comment 19**

Attachment E, section 10.1.4.7. "Minor edit. These sections do not exist. It's believed this should refer to Items 10.1.4.3 through 10.1.4.7."

#### **Staff Response to SCRWA - Comment 19**

Central Coast Water Board staff agree.

Change Made: The text has been updated in Section 10.1.4.7 of Attachment E with the correct section references.

### **SCRWA - Comment 20**

Attachment E, section 11.2.3, table E-8. "Receiving water does not have any 1/year parameters, but effluent does."

#### **Staff Response to SCRWA - Comment 20**

Central Coast Water Board staff agree in part. The comment was regarding an annual report listed in Table E-8 of Attachment E. Instead of updating the sections which the report covered, staff confirmed that the annual report for receiving water was duplicative of portions of the annual summary report in Table E-8 in Attachment E and the annual report for receiving water in Table E-8 was removed. The annual summary report should summarize receiving water monitoring, effluent monitoring, compliance, as well as other requirements as specified in section 8.4.8 of Attachment D. Effluent monitoring for parameters which are conducted annually are reported in the monthly report covering the period in which the samples were taken.

**Change Made:** Revised Table E-8 in Attachment E, removing the duplicate annual report for receiving water monitoring.

### **SCRWA - Comment 21**

Attachment E, section 11.2.3, table E-8. "Per section 10.1.4.7, the fourth quarter report shall be incorporated into the annual report."

#### **Staff Response to SCRWA - Comment 21**

Central Coast Water Board staff agree.

Change Made: Revised Table E-8 in Attachment E for the pretreatment annual report to include the fourth quarter report, added a footnote specifying that the fourth quarter report is included in the pretreatment annual report, updated pretreatment section references, and removed the fourth quarter report from quarterly requirements.

### **SCRWA - Comment 22**

Attachment F, section 3.3.8. "Minor edit. Receiving water limits are no longer included."

#### **Staff Response to SCRWA - Comment 22**

Central Coast Water Board staff agree.

Change Made: Revised the affected Fact Sheet discussion to remove the reference in section 3.3.8. of the Fact Sheet to receiving water limits.

### **SCRWA - Comment 23**

Attachment F, section 4.2.2. "Minor edit. The mass limits were removed and 122.45(d) is specifically only applicable for continuous dischargers."

#### **Staff Response to SCRWA - Comment 23**

Central Coast Water Board staff agree. In section 4.2.2. of the Fact Sheet there is a statement regarding mass limits and references 40 CFR section 122.45(d). The legal explanation in the Fact Sheet should reflect the Order requirements. The discussion of

continuous discharge mass limits is not the appropriate basis for this noncontinuous discharge permit.

Change Made: No change to effluent limits. In section 4.2.2 of the Fact Sheet the reference to 40 CFR section 122.45(d) was removed.

#### **SCRWA - Comment 24**

Attachment F, section 4.3.6.6. “Minor edit. These were not previously required in the 2017 permit.”

#### **Staff Response to SCRWA - Comment 24**

Central Coast Water Board staff agree in part. The Fact Sheet should describe the proposed Order history more precisely. The previous Order record reflected an intent to require chlorpyrifos and diazinon monitoring in the supporting rationale in the fact sheet, but the requirement was not clearly carried into the monitoring and reporting program. The proposed Order resolves that ambiguity by expressly requiring chlorpyrifos and diazinon monitoring in Attachment E the Monitoring and Reporting Program.

Change Made: No change to monitoring requirements. Section 4.3.6.6 of the fact sheet has been revised to describe the previous Order’s intent to require chlorpyrifos and diazinon monitoring in its fact sheet, but that the requirement was inadvertently not included in its monitoring and reporting program, and that the proposed Order clarifies the monitoring requirement by expressly including it in the monitoring program.

#### **SCRWA - Comment 25**

Attachment F, section 7. “Some minor edits are included in this section for factual clarity regarding requirements that were retained, revised, or added.” Specifically, the commenter requests revisions to Fact Sheet section 7.2 to clarify changes in monitoring frequency for chronic toxicity, chlorpyrifos, and diazinon, and to remove or revise language regarding chronic toxicity requirements for Discharge Point 002.

#### **Staff Response to SCRWA - Comment 25**

Central Coast Water Board staff agree with the suggested edits. Consistent with the change made in response to Comment 24, staff have revised section 7 of the Fact Sheet to clarify the monitoring required by the proposed Order and how that differed from the prior monitoring and reporting program. The Fact Sheet revisions elucidate changes in monitoring frequency and revised language concerning chronic toxicity requirements for Discharge Point 002.

Change Made: Section 7.2 of the Fact Sheet was revised to clarify the increased frequency and the required monitoring.

### **SCRWA - Comment 26**

Attachment F, section 7. “It would be appropriate to discuss why land discharge monitoring, recycled water monitoring, groundwater monitoring, and Llagas Creek monitoring were removed from this permit.”

#### **Staff Response to SCRWA - Comment 26**

Central Coast Water Board staff agree that additional explanation would improve clarity. The proposed Order regulates the discharge of tertiary treated wastewater to the Pajaro River. It does not provide regulatory coverage for discharges to the Facility’s percolation ponds adjacent to Llagas Creek, for land discharge activities, for recycled water production and onsite reuse activities, or for groundwater protection associated with those land-based wastewater management activities. As explained in sections 4.6, 4.7, and 5.2 of the Fact Sheet, those activities are instead regulated under Order R3-2020-0020, *General Waste Discharge Requirements for Discharges from Domestic Wastewater Systems with Flows Greater than 100,000 Gallons Per Day*, and related recycled water use requirements may also be regulated under State Water Board Order WQ 2016-0068-DDW, as applicable.

Accordingly, monitoring requirements that were included in the previous Order because it also provided regulatory coverage for land discharge, groundwater, recycled water, and the Llagas Creek related percolation pond pathway have not been carried forward into the proposed Order. The proposed Order maintains monitoring for the discharge authorized to the Pajaro River and associated compliance determinations.

Change Made: Sections 7.5 through 7.7 were added to the Fact Sheet to include explanations that this Order regulates the discharge of treated wastewater to the Pajaro River, and that monitoring for land discharge to percolation ponds adjacent to

Llagas Creek, recycled water production and onsite reuse, groundwater protection, and related land-based wastewater management activities is addressed under Order R3-2020-0020 and WQ 2016-0068-DDW, rather than under this Order.

### **SCRWA - Comment 27**

Attachment F, section 7.3. “This language is requested to be consistent with the permit proper and MRP.”

#### **Staff Response to SCRWA - Comment 27**

Central Coast Water Board staff agrees in part. Section 7.3 of the Fact Sheet should provide the description, reasons, and changes to required monitoring between the previous Order and the proposed Order. However, repeating the requirements in section 7.3 the Fact Sheet has the potential to lead to error or confusion. Instead, referencing requirements in the proposed Order and MRP is more appropriate for the specific requirements and methodologies for chronic toxicity testing.

Change Made: Revised section 7.3 of the Fact Sheet to clarify the changes in chronic toxicity monitoring and the causes for the changes, and included references to section 5 of the MRP for the specifics on monitoring required.

### **SCRWA - Comment 28**

Attachment F, section 7.4.1. “It’s requested that total coliform and fecal coliform be removed from the RSW monitoring. If this request is not accepted, then fecal coliform needs to be removed from the list of items removed and total coliform needs to be added to the list of parameters added.”

#### **Staff Response to SCRWA - Comment 28**

Central Coast Water Board staff refer to the response to Comment 10 regarding the request to remove receiving water monitoring for fecal coliform and total coliform. Staff does not agree with removing that monitoring. Staff agrees that section 7.4.1 of the Fact Sheet should be revised to accurately describe the changes to the receiving water monitoring program in the proposed Order. Rather than stating that receiving water monitoring is retained from the previous Order, section 7.4.1 will be revised to state that the monitoring program has been revised and to describe the changes.

Change Made: Section 7.4.1 of the Fact Sheet is revised to clarify that the receiving water monitoring program in the proposed Order has been revised from the previous Order. The revised text describes the changes including revisions to flow monitoring, additions of monitored parameters, and revisions to monitoring frequency and implementation details, so that section 7.4.1 more accurately reflects the monitoring requirements in Attachment E.

### **SCRWA - Comment 29**

Attachment F, section 7.5.2 (now 7.8.2 with revisions). “SCRWA would appreciate it if Section 7.5.2 of the Fact Sheet is revised to explain why biosolids monitoring requirements have been changed.”

#### **Staff Response to SCRWA - Comment 29**

Central Coast Water Board staff agree. Section 7.5.2 Fact Sheet (now 7.8.2 with revisions) has been revised to clarify that the biosolids monitoring requirements in the proposed order are generally retained from the 2017 order, but have been reorganized and reformatted. In the proposed order, biosolids provisions are grouped in Attachment E, section 9, Biosolids Monitoring, Notification, and Reporting, rather than presented solely as a biosolids monitoring section. The biosolids monitoring frequency table was moved and renumbered from former Table E-9 to Table E-6, and the biosolids monitoring requirements table was moved and renumbered from former Table E-10 to Table E-7. Related references were revised accordingly. In addition, Table E-7 was moved to follow Table E-6. The revised text also explains that some monitoring requirements were relocated from the table to associated text or footnotes, including nitrogen-related sampling for directly land-applied biosolids, which remains addressed in the Table E-6 footnote. In addition, the revised text explains that some parameters previously listed in the previous Order Table E-10 in Attachment E are no longer expressly listed in proposed Order Table E-7 in Attachment E. The revised text further notes that the proposed order continues to require certain pollutant testing elsewhere in the biosolids section, including metals required by 40 CFR part 503 and section 307(a) pollutant sampling for Class 1 facilities.

Change Made: Fact Sheet section 7.8.2 was revised to explain that the biosolids provisions were reorganized in the proposed Order. The revised text identifies the parameters that were removed from the monitoring table, while noting that the

proposed Order continues to address some parameters in the text in section 9 of Attachment E.