

## ATTACHMENT B

CITY OF STOCKTON COMMENTS  
ON  
TENTATIVE WASTE DISCHARGE REQUIREMENTS  
FOR THE  
CITY OF STOCKTON  
REGIONAL WASTEWATER CONTROL FACILITY  
SAN JOAQUIN COUNTY

ADDITIONAL COMMENTS AND FACTUAL CORRECTIONS

Submitted April 25, 2014

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### I. ADDITIONAL COMMENTS AND FACTUAL CORRECTIONS

#### A. Limitations and Discharge Requirements

p. 1, Table 1. The Facility Address needs to be corrected to show that the Facility is located in San Joaquin County.

p. 2, C. Provisions and Requirements Implementing State Law. One of the subsection cross-references in the first sentence that needs to be changed from “VI.C.5.b-d” to “VI.C.5.b-c.” There is no subsection VI.C.5.d in the tentative permit.

p. 8, Groundwater Limitations. There is no color objective for groundwater in the Basin Plan. Therefore, the final groundwater limitation should be modified as follows:

3. Impart taste, odor, chemical constituents, or toxicity, ~~or color~~ that creates nuisance or impairs any beneficial use.

p. 8, Table 6. Groundwater Limitations. The numerical TDS limitation of 450 mg/L will be routinely exceeded in 20 of 21 wells. The City submitted a background groundwater report that characterized TDS in groundwater at the RWCF (see *Background Groundwater Quality Characterization Report*, Condor Earth Technologies, Inc., March 22, 2013). The background TDS interquartile ranged from 548 mg/L to 1563 mg/L with a median concentration of 1,050 mg/L and a mean value of 1153 mg/L. The mean RWCF value agrees well with typical background TDS independently measured for the Delta Sub-basin (see Page F-73 in Section 5, which cites the natural TDS background average as being 1190 mg/L). The City’s statistical analysis (see **Figure 1**) has demonstrated that a 450 mg/L limitation is likely to be routinely exceeded. Similarly, the City’s statistical analysis (see **Figure 2**) has demonstrated that a 2,000 µmhos/cm limitation is likely to be routinely exceeded. By specifying limitations that will be routinely exceeded, the Regional Board creates unnecessary complications for the Discharger’s reporting and public relations.

The City requests the addition of a footnote to the TDS limitation in Table 6: Natural background quality is known to have exceeded this TDS limitation at all 21 monitoring points.

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The City requests the addition of a footnote to the Electrical Conductivity @ 25°C (EC) limitation Table 6: Natural background quality is known to have exceeded this EC limitation at 11 of 21 compliance monitoring points.

p.20 VI.C.7.b. Time Schedule for Compliance with Groundwater Limitations and Best Practicable Treatment or Control (BPTC). The City is concerned that the permit language mischaracterizes issues requiring BPTC review near the oxidation ponds, MW-13 and MW-12. The order of the sentences implies that the background groundwater report indicated possible groundwater degradation where the secondary treated effluent is stored in unlined ponds, but that was not concluded in the report. The report describes the groundwater interceptor system surrounding the ponds and found no degradation outboard of that system. Salinity and nitrogen downgradient of the ponds were no different than background. Possible degradation was identified in the report at three areas, near wells MW-13, MW-12 and MW-10. At MW-13 groundwater data show statistically significant decreasing trends in TDS, EC, and chloride. The permit incorrectly states nitrate is elevated at MW-12. At well MW-12 nitrate-N ranged up to 5.2 mg/L between 2008 to 2010 but has been less than 1 mg/L since 2012. Salinity is increasing at MW-12, but the salinity does not exceed the expected range of regional background groundwater quality. The former nitrate spike and increasing salinity at this well may be related to issues requiring BPTC review.

State Water Board Resolution 68-16 (Antidegradation Policy) requires best practicable treatment or control of the discharge necessary to assure that, “(a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.” The Discharger currently stores digested sludge in an unlined lagoon. ~~and secondary treated effluent is contained in unlined ponds.~~ A recently completed *Background Groundwater Quality Characterization Technical Report for the City of Stockton Regional Wastewater Control Facility* (March 2013) indicated possible groundwater degradation from the Facility (see Attachment C for groundwater monitoring well network contour map). Data evaluation identified three localized possible impacts to groundwater quality: 1) known leak at the foul air duct near monitoring well MW-13 that was repaired in 2004. Groundwater at this well and has substantially self-remediated with respect to nitrate and shows statistically significant decreasing trends with respect to TDS, EC, and chloride; however, groundwater salinity remains high relative to most other wells; 2) MW-12 adjacent to the sludge lagoon previously had ~~has~~ elevated nitrate and has increasing salinity trends; and 3) MW-10, under which groundwater does not move, has elevated nitrate.

p. 20, Methylmercury Compliance Schedule. The placement of footnote #3 next to the full compliance date of 31 December 2030 appears to be incorrect, as footnote #3 discusses the CVCWA Coordinated Methylmercury Control Study. It appears that footnote #4 should be placed next 31 December 2030, as it does discuss the final compliance date.

p. 23, VII.C. Average Dry Weather Flow Effluent Limitations (Section IV,A,1,j). Remove the reference to specific months “(e.g., July, August, September)” as these are not always the three lowest flow months.

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p. 25, Compliance Determination. Some section references are incorrect as noted below:

- *Temperature Receiving Water Limitations* – should be to Section V.A.15.b.
- *Turbidity Receiving Water Limitations* – should be Section V.A.17.a-e.
- *Temperature Effluent Limitations* – should be Section IV.A.1.f.

### **B. Attachment E – Monitoring and Reporting Program (MRP)**

p. E-2, General Monitoring Provisions. C. A manual containing the steps followed in this program for any onsite field measurements such as pH, DO, turbidity, temperature, and residual chlorine must be kept onsite in the treatment facility laboratory and shall be available for inspection by Central Valley Water Board staff. Please change “facility laboratory” to “plant operations division.”

p. E-3, Monitoring Station Locations. The description of the PND-001 – 003 should be changed to describe the ponds as “treatment ponds” consistent with the labeling in the Limitations and Discharge Requirements section on pp. 16–17.

p. E-3, Table E-1. Change monitoring location name from PND-001-003 to PND123C.

p. E-4, Sentence below Table E-1. Clarify that the table referenced is Table E-1 in the sentence regarding latitude and longitude.

p. E-5, Table E-3. Format the final permit so that the Table E-3 heading is on the same page as the table. Also, there are no effluent limitations for dissolved oxygen (DO), therefore the 1/day monitoring of effluent DO is unnecessary and the City requests DO be removed from Table E-3.

p. E-5, Table E-3, Footnote 4: Footnote 4 on Table E-3 for Ammonia requires that “pH and Temperature shall be recorded at the time of ammonia sample collection” this is not possible since this sample is done on a refrigerated 24-hour composite sample. Effluent pH and temperature data are collected from online meters. The City requests that footnote 4 be removed.

p. E-9, Table E-6. Receiving Water Monitoring Requirements – Ammonia. The City has three comments related to ammonia monitoring in the receiving water:

- There is an effluent limitation for ammonia in the tentative permit, which was derived without application of dilution credit. Further, there is no receiving water limitation for ammonia. Therefore, monitoring for ammonia in the receiving water is not necessary and should be removed from the tentative permit. Also, there are two footnotes associated with ammonia.
- Footnote #1 specifies that pH and temperature are to measured concurrent with the ammonia sample collection to “allow for a determination of ammonia toxicity.” Compliance with ammonia limitations is determined at EFF-001, not in the receiving water. And no dilution credit has been granted for the ammonia limitations. Therefore,

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requiring the City to make a determination about ammonia toxicity in the receiving water is unnecessary.

- Footnote #2 specifies a minimum method detection limit (MDL) for ammonia. MDLs change over time as they are recalculated by laboratories in accordance with 40 CFR 136, and are beyond the control of the discharger. Therefore, this footnote should not specify a MDL for analysis. It would be appropriate to specify a maximum reporting level, which corresponds to the lowest limit of quantification. The City's analytical laboratory is currently capable of an MDL of 0.18 mg/L and a reporting level (RL) of 0.5 mg/L. If the tentative permit must specify a RL for ammonia, the City requests the RL be 0.5 mg/L.

p. E-9, C.1. Groundwater Monitoring Locations RGW-001. The permit mentions closure of three shallow wells MW-1s, MW-2s, and MW-19s used for a supplemental investigation. Please provide clarity on when MW-1s, MW-2s, and MW-19s are "scheduled" to be closed/destroyed. May the City decide when to submit a closure plan for the wells?

Prior to construction and/or beginning a sampling program of any new groundwater monitoring wells, the Discharger shall submit plans and specifications to the Central Valley Water Board for approval. The existing monitoring network currently consists of 21 active wells, including Monitoring Well Nos. MW-1, MW-1s, MW-2, MW-2s, MW-3, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-11, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, MW-18, MW-19 and MW-19s. Monitoring wells MW-1s, MW-2s, and MW-19s are scheduled to be closed, while monitoring wells MW-2, MW-8, MW-14, MW-15, and MW-19 are to become dormant, but maintained in operable condition.

p. E-11, VIII.C and Table E-9. Wastewater in Facultative Ponds. The title for this section should be changed to "Wastewater in Treatment Ponds – Monitoring locations PND-123C" to be consistent with the terminology used in the Limitations and Discharge Requirements section of the tentative permit. Also, in the sentence below the section heading, the table reference should be Table E-9.

p. E-15, Table E-10. Effluent and Receiving Water Characterization Monitoring. To be consistent with Table E-3 (Effluent Monitoring), the effluent sample type in this table should be changed as follows:

- *Temperature* – from grab to meter
- *TDS* – from 24-hour composite to grab

p. E-17, Table E-11. Monitoring Periods and Reporting Schedule. A definition of reporting period for "3/week" is needed in table, to correspond with parameters that are to be monitored 3 times per week (i.e., CBOD, TSS, total coliform organisms, ammonia).

p. E-18, 5. Multiple Sample Data. There are no priority pollutants with average weekly effluent limitations (AWEL), as the SIP procedures for effluent limitation development only

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generate an average monthly effluent limitation (AMEL) and maximum daily effluent limitation (MDEL). Therefore, “AWEL” should be deleted from the first sentence in this section.

p. E-18, 7.c. Chlorpyrifos and Diazinon Effluent Limitations. The equation cross-reference in this section should be to section IV.A.1.k.

p. E-20, D.1. Special Study and Progress Reports. First, it is suggested that this section title be changed to “Special Study Progress Reports,” since Table E-12 only lists progress reports. Second, this section’s requirements for progress reports (i.e., discuss status of compliance, etc.) does not match the type of study being reported on in all cases. In the case of mercury, the progress report requirement in this section conflicts with the reporting requirements defined for the methylmercury compliance schedule on page 20. And there is no final compliance date associated with the pollution prevention plans (PPPs). Finally, Table E-12 does not list all progress reports required by the tentative permit. Therefore, the City recommends the following modifications to this section:

### **D. Other Reports**

1. ~~Special Study Reports and Progress Reports.~~ As specified in the compliance time schedules required in the Special Provisions contained in section VI of the Order, special study and progress reports shall be submitted in accordance with the following reporting requirements. ~~At minimum, the progress reports shall include a discussion of the status of final compliance, whether the Discharger is on schedule to meet the final compliance date, and the remaining tasks to meet the final compliance date.~~

**Table E-12. Reporting Requirements for Special Provisions Reports**

Special Provision	Reporting Requirements
Pollution Prevention Plan for Mercury and Compliance Schedule for Methylmercury, Progress Reports (Provisions VI.C.3.a and VI.C.7.a)	<b>30 January</b> , annually, <u>beginning 30 January 2015</u>
Pollution Prevention Plan for Salinity, Progress Reports (Provision VI.C.3.b)	<b>1 June</b> , annually, <u>beginning 1 June 2015</u>
Phase 1 Methylmercury Control Study Progress Report (Special Provision VI.C.7.a)	<b>20 October 2015</b>
Groundwater Limitations and BPTC Compliance Schedule, Progress Reports (Special Provision VI.C.7.b)	<b>1 June</b> , annually, <u>beginning 1 June 2016</u>
Nitrate plus Nitrite Compliance Schedule (Special Provision VI.C.7.c)	<b>30 June</b> , annually, <u>beginning 30 June 2015</u>

p. E-20, item 2 under Table E-12. The final sentence in this section should be corrected to state that the SMR requirements are contained in subsection IX.B above.

p. E-21, 5. Pretreatment Reporting Requirements. Item a in this section requires annual priority pollutant monitoring for the influent and effluent. The annual priority pollutant monitoring frequency for the effluent conflicts with section VIII.D of the MRP, which specifies

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bi-monthly monitoring for one year in 2017. The City requests that the pretreatment program influent and effluent monitoring requirements be modified to be consistent with section VIII.D. Also, the pretreatment reporting requirements prescribe sludge sampling method. Sludge sampling is addressed in section VIII.A of the MRP. Therefore, the City requests the pretreatment reporting section be modified to cross-reference section VIII.A. Requested edits are shown below.

An annual report shall be submitted by **28 February** and include at least the following items:

- a. A summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants USEPA has identified under section 307(a) of the CWA which are known or suspected to be discharged by nondomestic users. This will consist of ~~an annual~~ full priority pollutant scan on influent and effluent samples collected bi-monthly for one year. The Discharger is not required to sample and analyze for asbestos. The Discharger shall submit the results of the ~~annual~~ priority pollutant scan electronically to the Central Valley Water Board using the State Water Board's CIWQS Program Website.

~~Sludge sampling and analysis shall be conducted according to Section VIII.A of the monitoring and reporting program. sampled during the same 24-hour period and analyzed for the same pollutants as the influent and effluent sampling and analysis. The sludge analyzed shall be a composite sample of a minimum of 12 discrete samples taken at equal time intervals over the 24-hour period. Wastewater and sludge sampling and analysis shall be performed at least annually.~~ The Discharger shall also provide any influent, effluent or sludge monitoring data for nonpriority pollutants which may be causing or contributing to Interference, Pass-Through or adversely impacting sludge quality. Sampling and analysis shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto.

### C. Attachment F – Fact Sheet

p. F-2, List of Tables. There are two tables in the list of tables (and later in the Fact Sheet) as “Table F-8.”

p. F-3, Table F-1. Facility Information. The Facility Permitted Flow should be identified as 55 million gallons per day (mgd), average dry weather flow.

p. F-4, Paragraph B. Order R5-2014-XXX needs to be replaced with the final order number.

p. F-24, Table F-8 (Bromoform). The ECA for bromoform should be shown as 38 µg/L, consistent with the technical memorandum submitted to support the dilution credit request and the final AMEL shown in Table 4 (Effluent Limitations).

p. F-25, Table F-8 (CDBM and DCBM). Footnotes #1 and #2 should be deleted, as the ECA is and associated dilution credit are not performance-based. Further, the AMEL should be

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shown as 7.4 µg/L, not 7.1 µg/L, consistent with the information submitted in the report of waste discharge for the dilution credit.

p. F-30, Bullet re. Upstream Receiving Water Hardness. This bullet should be corrected to state that the lowest observed upstream receiving water hardness was 36 mg/L.

p. F-32, First full paragraph. The final sentence in this paragraph references Table F-5. Table F-5 is a table of Clean Water Act section 303(d)-listed constituents in the southern Delta. This parenthetical should be deleted.

p. F-35, Aluminum. The final sentence in the first full paragraph references Order R5-2007-0039 and states this Order included effluent limitations based on the NAWQC chronic criterion for aluminum. This entire sentence should be deleted; the order number is incorrect and the aluminum limitations in the current NPDES permit are not based on the NAWQC chronic criterion.

p. F-36, Footnote #1. This footnote states that Attachment A contains detailed definitions for NOEC, LOEC, and EC50. Attachment A contains no such definitions, therefore, the final sentence in this footnote should be deleted.

p. F-43, c. Constituents with Limited or Insufficient Data. The placement of diazinon, chlorpyrifos, and salinity-related parameters in this section is incompatible with the title, as there is sufficient data to characterize concentrations (i.e., data are not limited). Further, effluent limitations have been included in the tentative permit for all three constituents. Therefore, the final sentence in the first paragraph stating, “When additional data become available, further analysis will be conducted to determine whether to add numeric effluent limitations or to continue monitoring,” is not applicable. The City appreciates that these constituents are not in the section titled “Constituents with Reasonable Potential,” because reasonable potential for these constituents has not been determined. Therefore, a relabeling of this section to “Constituents with Inconclusive Reasonable Potential” is recommended.

p. F-44, Diazinon and Chlorpyrifos. The RPA results section states that method detection limits (MDL) for chlorpyrifos and diazinon were above the water quality objectives. This is incorrect; the diazinon MDL was 0.01 µg/L, which is below the diazinon acute and chronic objectives, and the chlorpyrifos MDL was below the acute objective. This section should be modified as follows:

**(b) RPA Results.** All 12 effluent monitoring results for chlorpyrifos were below the reported method detection limit (0.017 µg/L). Similarly, all 12 effluent monitoring results for diazinon were below the reported method detection limit (0.01 µg/L). Since the reported method detection limits for chlorpyrifos is and diazinon are above the chronic water quality objectives, the reasonable potential analysis for the tertiary treated effluent is inconclusive due to insufficient data.

p. F-45, Paragraph preceding Table F-12. The final sentence in this paragraph refers to studies required by the tentative permit to establish an agricultural limit. No such studies are included in the tentative permit, therefore, this sentence should be deleted.

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p. F-63, 4. WQBEL Calculations. The words “dissolved oxygen” should be deleted from the first sentence in item “a,” because there are no dissolved oxygen effluent limitations included in the tentative permit.

p. F-64, e. Human Health Criteria. For accuracy, the second sentence should be revised as follows. AMELs are calculated from the ECAs, not the other way around.

- e. Human Health Criteria. WQBELs based on human health criteria, are also calculated in accordance with Section 1.4 of the SIP. The ~~ECAs are~~ AMEL is set equal to the ~~AMEL~~ ECA and a statistical multiplier was used to calculate the MDEL.

p. F-65, Footnote #4. The denominator in the Savg equation should be changed from 0.079 to 0.08, to be consistent with other parts of the tentative permit (e.g., effluent limitation on p. 5).

p. F-66, Chronic Aquatic Toxicity. The table reference in the final sentence of the first paragraph should be Table F-14 (or the final table number, if tables are renumbered to address there being two tables labeled F-8, per the above comment).

p. F-73, First full paragraph under item iv. A parenthetical in this paragraph makes incorrect reference to the section number with the groundwater limitations compliance schedule. The correct section reference is VI.C.7.b, not VI.C.2.c.

p. F-73, D.5. Background and Hydrologic Conditions. The comparison being made is between regional groundwater quality and SJR surface water near RWCF (See page F-47 reference to 279 mg/L in background receiving waters). Surface waters have only a minor localized connection to background groundwater quality. The sentence’s location in the section on Effluent Limitations for Groundwater Quality creates the false impression that local groundwater is less saline than the regional basin average, which it is not.

In general, areas of poor water quality with high salinity exist throughout the Delta subbasin. TDS values range from 210 to 7800 mg/L and average about 1190 mg/L and elevated chloride and nitrate levels occur in several areas within the Delta subbasin (California’s Groundwater, Bulletin 118, 20 January 2006). ~~Monitoring results obtained along this segment of the SJR from January 2009 through December 2012 indicate an average TDS value of about 279 mg/L, which is significantly lower than the subbasin levels.~~

p. F-74, Groundwater Monitoring Network and Chemistry. In the first sentence in this section, “Appendix C” should be changed to “Attachment C.”

p. F-74, Groundwater Monitoring Network and Chemistry. The term “high’ is relative to a standard, either the limitation or background whichever is greater. The City requests the following changes to this language.

Non-parametric statistical review of each monitored constituent was conducted to identify areas of potential threat of groundwater degradation. The background groundwater characterization indicates two monitoring wells, MW-10 and MW-12,

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have likely been impacted by the Facility's discharge. Quarterly samples of electrical conductivity (EC), total dissolved solids (TDS), ammonia, nitrate as nitrogen, Total Kjeldahl Nitrogen (TKN), and total coliform were collected. Water quality as indicated by the analytical results shows high levels of EC and TDS levels of EC and TDS within expected background ranges but exceeding Basin Plan water quality objectives in monitoring wells MW-1, MW-2, MW-3, MW-4, MW-5, MW-6, MW-7, MW-8, MW-9, MW-10, MW-12, MW-13, MW-14, MW-15, MW-16, MW-17, and MW-18. Analytical results also show high levels of nitrate in monitoring wells MW-10 and MW-13, and high levels of total coliform in monitoring wells MW-7, MW-8, MW-9, MW-13, and MW-17. include concentrations of nitrate in monitoring wells MW-10, MW-13, and MW-15, and concentrations of total coliform in monitoring wells MW-7, MW-8, MW-9, MW-13, MW-15, and MW-17 exceeding the Basin Plan water quality objectives.

p. F-74 and F-75, Groundwater Limits. Boron was noted at MW-12 as exceeding the water quality objectives for agriculture; however, it was not concluded that this boron resulted from facility discharges. Boron was also found at concentrations equal and higher in background grab samples, and could be naturally occurring.

... determining if the discharge degrades groundwater and in evaluating the performance of the Facility's BPCT measures. Since anthropogenic activities do not affect all aspects of water quality, it is possible that background water quality conditions can exist for one constituent but not for another, and therefore, generalizations about the subbasin water quality conditions may not adequately protect the beneficial uses. The 2013 Condor report concluded that concentrations of nitrate (as N) have been exceeded at MW-10 and degradation degradation of local groundwater with respect to salinity, specifically potentially boron, at MW-12, which indicate possible impacts from the Facility.

p. F-74 and F-75, Groundwater Limits. The term "background wells" is undefined in the permit. The sentence works without introducing this term. The ponds are a recharge-centered hydrogeologic system where groundwater does not enter and flow through the site. Background water quality was characterized using numerous grab samples from a proxy area and statistical testing. While wells MW-15 and MW-16 have previously been referred to as "background wells" in the past, their status as such could be criticized because well MW-15 is impacted by offsite land uses and MW-16 is downgradient of the RWCF.

It is illogical that the relatively high EC and TDS at MW-1 and MW-2 indicate that the treated effluent may be impacting groundwater. As described in the Background Groundwater Report, median TDS values at MW-1 (1,470 mg/L) and MW-2 (1,500 mg/L) far exceed the median concentration in wastewater at the recirculation canal and Pond #1 (500 mg/L). Stable isotopes from both wells are distinct from effluent samples in the ponds, suggesting no detectable mixing. For these reasons the relatively high groundwater salinity at these wells was attributed to naturally occurring salinity undiluted by pond seepage.

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A possible threat of offsite migration induced by the hydrostatic pressure in the ponds was considered unlikely due to the natures of the levee materials where “Many pockets of stagnant groundwater are expected to occur around and under the RWCF ponds”.<sup>1</sup>

Statistically significant upward trends were identified for iron at both wells MW-1 and MW-2 and for EC and sodium at MW-1. Given the much lower iron, EC, and sodium values in effluent, these trends are anomalous unless they represent a secondary chemical effect of the discharges. Denitrification in the subsurface near the ponds could result in chemical gradients promoting the dissolution of iron and sodium from soil. If so the effects are more likely the result of diffusion transport than advective flow and would be localized around the ponds.

~~TDS and EC concentrations in nearly all wells, including at times the background wells, exceed water quality objectives. However, high TDS and EC concentration values in localized areas such as monitoring wells MW-1 and MW-2 located between Pond #1 and the San Joaquin River on the western portion of the Facility, indicate that the treated domestic wastewater may be impacting groundwater. Further indications that MW-1 and MW-2 may be locally impacted comes from a Salinity exceeding Basin Plan water quality objectives occurs in such wells as MW-1 or MW-2 located between Pond #1 and the San Joaquin River. A hydrograph study finding that states “there is a net hydrostatic pressure gradient towards the river from the ponds.” (Condor Earth Technologies, Inc. September 2006).~~

p. 75, First partial paragraph. There are a couple typographic errors in this paragraph. “BPCT” should be changed to “BPTC” and “degradation” should be changed to “degradation.”

p. F-76, Stringency of Requirements. The words “dissolved oxygen” should be deleted from the first paragraph in this section, because there are no effluent limitations for dissolved oxygen.

p. F-76, Table F-15. Summary of Final Effluent Limitations. The following corrections are needed for this table:

- The ammonia limitations in this table are incorrect and should be replaced with the limitations as shown in Table 5 (Effluent Limitations).
- The “Dissolved Oxygen” row should be deleted, as there are no final limitations for dissolved oxygen.
- The 0.079 denominator in footnote #5 should be changed to 0.08 to be consistent with the rest of the tentative permit.

p. F-78, E. Interim Effluent Limitations. The section reference in this paragraph should be changed from VI.B.7 to VI.B.6.

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<sup>1</sup> *Background Groundwater Quality Characterization Technical Report*, Condor Earth Technologies, Inc. 2013, page 2. Previously submitted to RWQCB.

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p. F-78, Compliance Schedule for Mercury. The third paragraph in this section has the incorrect submittal date for the mercury PPP. The correct date is 8 June 2009.

p. F-79, IV.F, Land Discharge Specifications. There are no land discharge specifications in the permit. This section should read “Not applicable.”

p. F-79, IV.G, Recycling Specifications. There are no recycling specifications in the permit. This section should read “Not applicable.”

p. F-80, A. Surface Water. The word “temperature” should be deleted from the final sentence of this section, because the temperature receiving water limitations are not based on the Basin Plan objective. A new sentence is needed to state that the temperature receiving water limitations are based on the Thermal Plan.

p. F-81, 5. pH. The historic effluent pH range shown here is incorrect. The correct historic pH range is 6.5 to 7.6, as correctly noted on p. F-62, ix.b, pH.

p. F-81 6. Ammonia. There is no ammonia limitation for groundwater, therefore, this entire section should be deleted.

p. F-80, V.B.4. Monitoring data does not show wells MW-3 and MW-5 had nitrate-N above 10 mg/L. Both of those wells are quite low in nitrate-N, less than 1.5 mg/L. Other wells that have previously exceeded the nitrate-N MCL are MW-13 and MW-15. MW-13 is a spill incident in remediation and MW-15 is an upgradient well installed for background data.

Furthermore, groundwater monitoring data show nitrate concentrations above the primary MCL of 10 mg/L in monitoring wells ~~MW-3 and MW-5~~ MW-10. The Chemical Constituents objective prohibits concentrations of chemical constituents in excess of California MCLs in groundwater that is designated as municipal or domestic supply. The California primary MCL for nitrate is equivalent to 10 mg/L as nitrogen, and groundwater beneath the facility is designated as municipal or domestic supply. It is therefore appropriate to adopt a numerical groundwater limitation of 10 mg/L for nitrate as nitrogen to implement the Chemical Constituents objective to protect the municipal and domestic use of groundwater.

p. F-82, b. Pollution Prevention. The word “prepare” should be changed to “implement,” as the City has already prepared PPPs for mercury and salinity.

p. F-86, BPTC. The final sentence in this section states that the schedule to complete the BPTC evaluation shall not exceed one year. This is inconsistent with the time schedule on p. 21 of the tentative permit, which states that the schedule will be developed under Task 2. Therefore, this sentence should be deleted.

p. F-86, Water Code Section 13263.3(d)(3) Pollution Prevention Plans. The words “nitrate plus nitrite” should be added to the first sentence in section i, as the tentative order requires a PPP for these constituents, also.

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p. F-87, Mercury Exposure Reduction Program. The date of the letter submitted by the City electing to participate in the collaborative MERP is incorrect. The correct date of the letter is 28 August 2013, as correctly indicated in section VI.C.3.c of the Permits Special Provisions.

p. F-88, Pollution Prevention Plan for Salinity. The term “Evaluation and Minimization Plan” should be changed to “pollution prevention plan” to be consistent with the terminology used in the remainder of the tentative permit.

p. F-92, 2. Effluent Monitoring. Monitoring for bis(2-ethylhexyl)phthalate is not a part of the MRP as reasonable potential for this constituent was not established. Therefore the statement regarding reduction in monitoring frequency should be deleted.

Rather, bis(2-ethylhexyl)phthalate should be added to the list of constituents in Fact Sheet Section VII.B.3 that showed no reasonable potential.

p. F-93, 1. Biosolids Monitoring. The cited cross reference should be corrected to VI.C.5.b.

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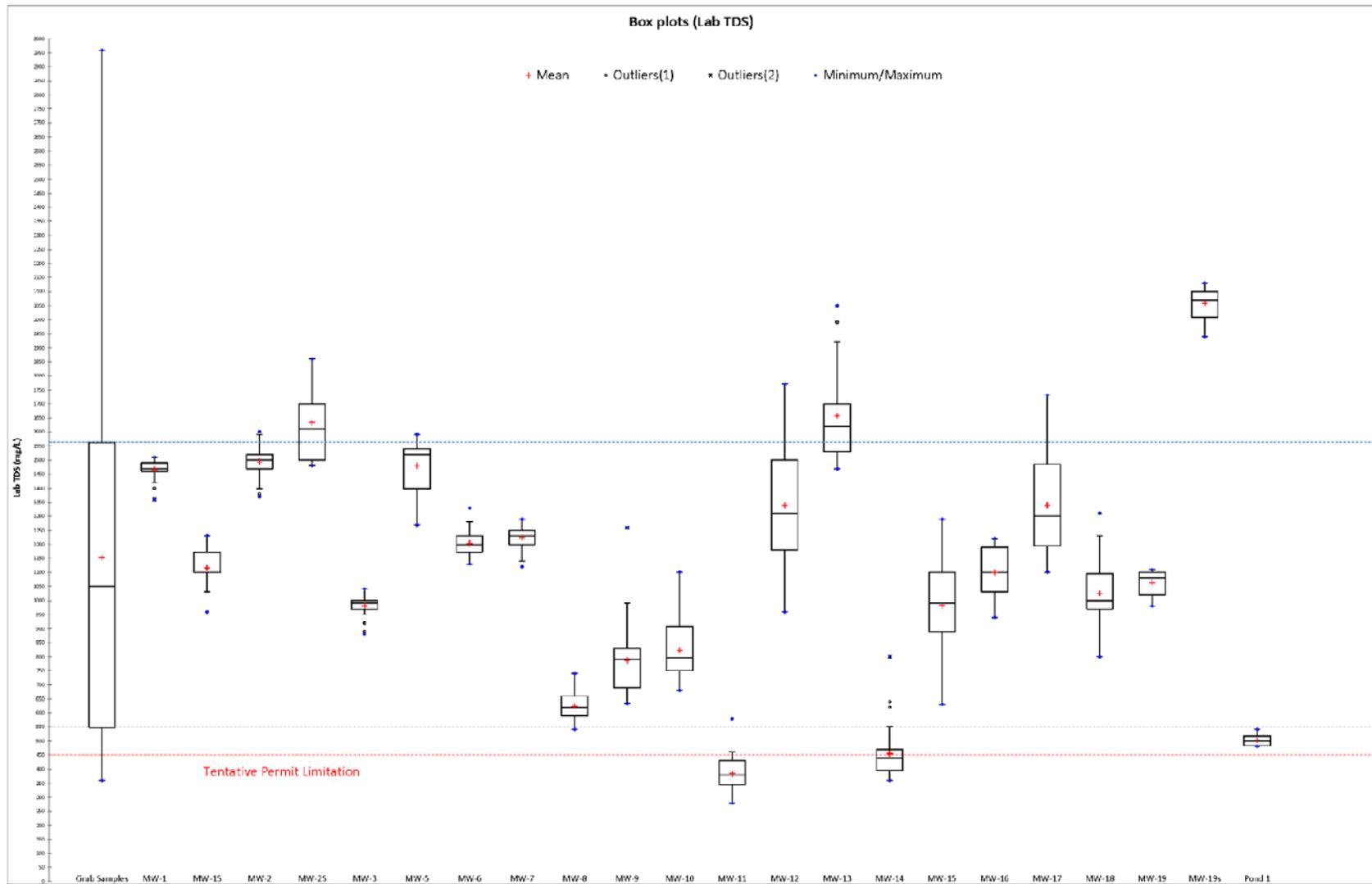


Figure 1. Range of TDS in monitoring wells at the Stockton RWCF relative to proposed limitation in Tentative Order.

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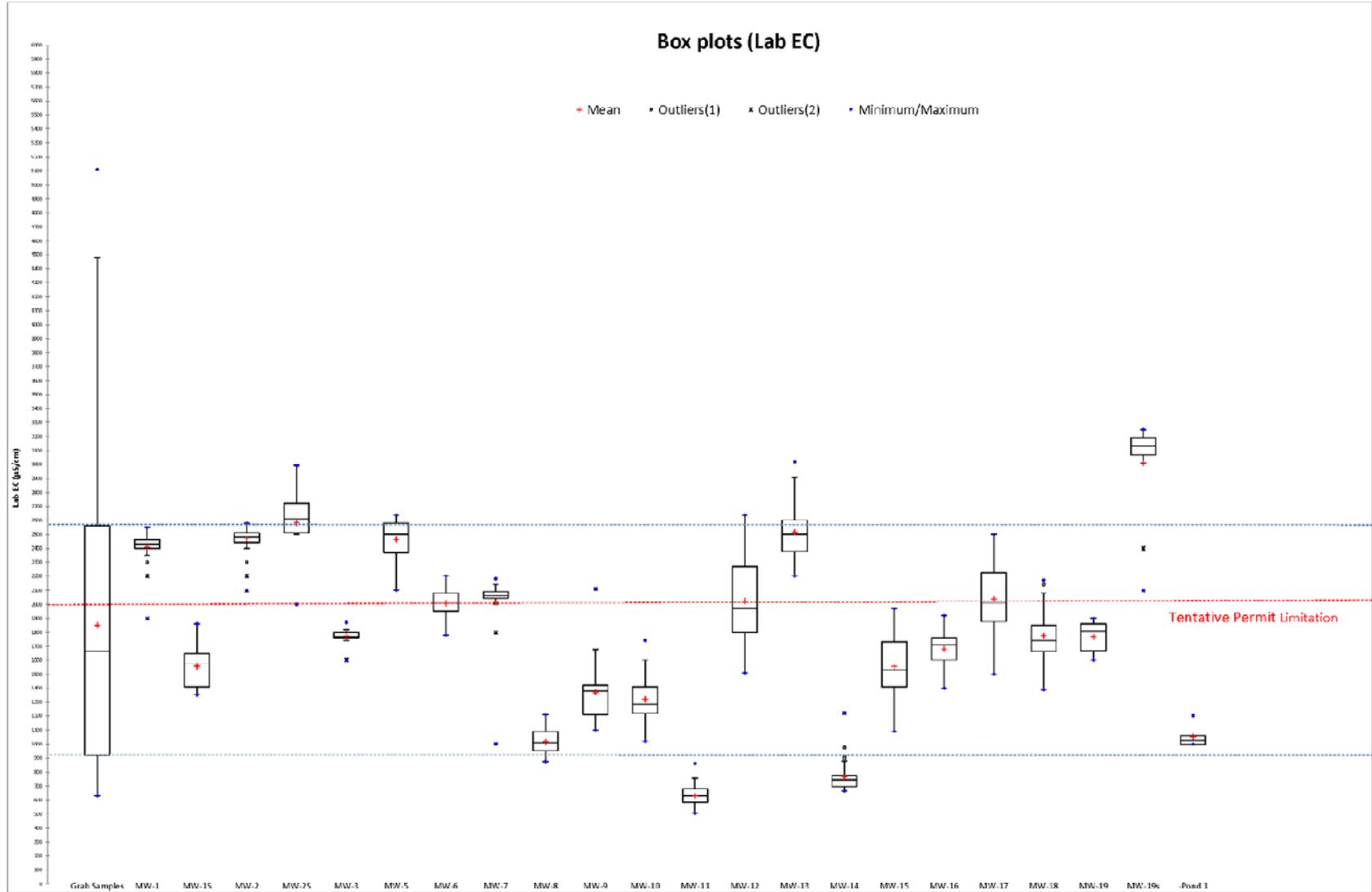


Figure 2. Range of EC in monitoring wells at the Stockton RWCF relative to proposed limitation in Tentative Order.