## Regional Water Quality Control Board Central Valley Region Board Meeting 13 August 2021

Response to Written Comments for the Jamestown Sanitary District Jamestown Wastewater Treatment Facilities Tuolumne County Tentative Waste Discharge Requirements

At a public hearing scheduled for 13 August 2021, the Regional Water Quality Control Board, Central Valley Region, (Central Valley Water Board) will consider adoption of revised Waste Discharge Requirements for Jamestown Sanitary District's Woods Creek Facility and new Quartz Wastewater Treatment Facility (WWTF), collectively referred to as the Jamestown Wastewater Treatment Facilities. This document contains responses to written comments received from interested persons regarding the tentative Waste Discharge Requirements (TWDRs) circulated on 17 June 2021. Written comments were required by public notice to be received by the Central Valley Water Board by 19 July 2021 to receive full consideration. Comments were received from Alison Furuya with Blackwater Consulting Engineers, Inc. (Blackwater), on behalf of the Jamestown Sanitary District (District or Discharger), on 19 July 2021.

Written comments are summarized below, followed by responses from Central Valley Water Board staff. In addition, staff has made a few minor changes to the TWDRs to improve clarity and fix typographical errors.

## **COMMENTS**

**DISTRICT COMMENT #1:** Finding 8 of the TWDRs states, in part, "The Woods Creek Facility is currently regulated by WDRs Order 5-01-062, which authorizes a 30-day average dry weather flow of up to 0.28 million gallons per day (mgd) of secondary disinfected effluent to the Quartz Reservoir." The District comments that Order 5-01-062 incorrectly authorized a 30-day average dry weather flow of up to 0.28 mgd. The average dry weather design capacity of the former Woods Creek WWTF was 0.23 mgd. The District requests this be recognized in Finding 8.

**RESPONSE:** Finding 8 of the TWDRs already notes that the actual dry weather capacity of the former Woods Creek WWTF was 0.23 mgd.

**DISTRICT COMMENT #2:** For Finding 18 of the TWDRS, the District requests deletion of "a" prior to "cloth media filtration."

**RESPONSE:** Finding 18 of the TWDRs has been modified to make the editorial correction.

**DISTRICT COMMENT #3:** The District states that Table 8 (Finding 79) of the TWDRs should be corrected by replacing "Quartz WWTF" with "Woods Creek WWTF".

RESPONSE: Finding 79, Table 8 of the TWDRs has been corrected

**DISTRICT COMMENT #4:** The Districts requests that Provision H.4 of the TWDRs be modified to reflect the actual dates specified in the influent flow limitations (Table 9) (i.e., 1 June through 31 August).

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**RESPONSE:** Provision H.4 of the TWDRs has been modified to reflect this request.

**DISTRICT COMMENT #5:** The District requests that Attachment C (Flow Diagram) be modified to note that an air gap between the tertiary disinfected effluent line and secondary disinfected effluent line exists.

**RESPONSE:** Attachment C of the TWDRs has been modified to reflect this request.

**DISTRICT COMMENT #6:** The District requests that the TWDRs' Information Sheet also note that the former Woods Creek WWTF average dry weather design capacity was 0.23 mgd, not 0.28 mgd (see Comment #1 above).

**RESPONSE:** The Information Sheet has been modified to reflect this request.

**DISTRICT COMMENT #7:** The District requests that the Information Sheet (page IS-2) recognize that the Quartz WWTF includes an on-site wastewater pump station and stormwater detention ponds.

**RESPONSE:** The Information Sheet has been modified to reflect this request.

**DISTRICT COMMENT #8:** The District requests that the daily total coliform effluent monitoring requirements specified in Table 3 (disinfected secondary effluent recycled water) and Table 4 (disinfected tertiary effluent recycled water) of the tentative Monitoring and Reporting Program (MRP) be reduced to once per week. The District comments that the Jamestown Wastewater Treatment Facilities are over an hour drive away from the nearest certified laboratory and would be a "costly addition to the operation of the wastewater treatment plant and challenging to the current staff to conduct."

**RESPONSE:** California Code of Regulations, Title 22, section 60321 requires the following:

(a) Disinfected secondary-23, disinfected secondary-2.2, and disinfected tertiary recycled water shall be sampled at least once daily for total coliform bacteria. The samples shall be taken from the disinfected effluent and shall be analyzed by an approved laboratory.

Since the Jamestown Wastewater Treatment Facilities produce both disinfected secondary-23 and disinfected tertiary recycled water, both recycled water discharges are required to be sampled daily for total coliform pursuant to Title 22, section 60321 to confirm compliance with the disinfection requirements specified in the TWDRs and Title 22.

**DISTRICT COMMENT #9:** The District requests that section II.C. of the tentative MRP (Disinfected Tertiary Effluent Monitoring) wording be modified to include the term "and used" at the end of the first sentence of the requirement.

**RESPONSE:** The only discharge locations proposed for the Jamestown Wastewater Treatment Facilities are recycled water use areas. Therefore, if the Jamestown Wastewater Treatment Facilities tertiary system is operational and producing disinfected tertiary recycled water, the monitoring specified in section II.C. of the tentative MRP must be conducted. Therefore, staff has not made the requested change.

However, in follow-up conversations between Central Valley Water Board staff and the District, the District notes that the disinfected tertiary recycled water may be combined with the secondary recycled water prior to discharge to the Quartz Reservoir during the winter months. If the District is able to receive approval from the State Water Resources Control Board, Division of Drinking Water to conduct compliance sampling at one location (of the combined effluent), the Central Valley Water Board staff will reevaluate the monitoring requirements and potentially modify the MRP.

**DISTRICT COMMENT #10:** The District requests that the Public Water Supply Monitoring Requirements (Section E of the MRP) be eliminated as the District is not the public water supplier for the community of Jamestown.

**RESPONSE:** The Public Water Supply Monitoring (Section E) requirements have been removed from the tentative MRP. However, the tentative MRP still requires the District to provide a copy of the most recent Consumer Confidence Report (CCR) in the Fourth Quarter Monitoring Report. The CCR provides data on the public water supply quality. This data allows staff (and the District) to compare effluent concentrations vs source water concentrations and determine if a change in effluent quality (e.g., salinity) could partially be attributed to a change in source water quality.

**DISTRICT COMMENT #11:** The District requests that the Groundwater Monitoring Requirements (Section D of the MRP) be modified to remove groundwater monitoring for nitrite, total Kjeldahl nitrogen, and total nitrogen.

**RESPONSE:** The requested changes have been made to the Groundwater Monitoring Requirements section of the MRP.