Central Valley Regional Water Quality Control Board
18/19 April 2024 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
Lincoln-SMD1 Wastewater Authority
Lincoln-SMD1 Wastewater Authority Wastewater Treatment and Reclamation Facility
Placer County

At a public hearing scheduled for 18/19 April 2024, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of tentative Waste Discharge Requirements (NPDES No. CA0084476) for the Lincoln-SMD1 Wastewater Authority (LiSWA), LiSWA Wastewater Treatment and Reclamation Facility. This document contains responses to written comments received from interested persons in response to the tentative Order. Written comments from interested persons and parties were required to be received by the Central Valley Water Board by 1 March 2024 in order to receive full consideration. Comments were received prior to the deadline from:

1. LiSWA (Discharger) (received 1 March 2024)
2. Joanne Kipps (received 1 March 2024)

Written comments from the above interested persons and party are summarized below, followed by the response of Central Valley Water Board staff.

DISCHARGER COMMENTS

DISCHARGER COMMENT #1 – The Discharger indicated that effluent stored in Tertiary Storage Basins 1 and 2 can be transferred between basins as well as process water can be transferred between Maturation Ponds 1 and 2; therefore, Tertiary Storage Basin 1 and 2 should be considered as a single unit process, as should Maturation Ponds 1 and 2. The Discharger also indicated that the liners for all four ponds were installed for pond maintenance and levee integrity purposes and not to prevent discharges to groundwater. For these reasons, the Discharger requested that both Tertiary Storage Basin 1 and 2 be either declared Discharge Point 002 and Maturation Ponds 1 and 2 be declared Discharge Point 003 or both discharge points be removed, and the ponds and basins be declared unit processes that may have incidental leakage that do not require a liner. Under either scenario, the Discharger also requests the removal of liner integrity and maintenance reporting because the reporting was focused on preventing discharge from the liners, not pond maintenance and levee integrity as the liners were designed to accomplish. The Discharger wants to focus their efforts on the additional land discharge, pond and groundwater monitoring and reporting along with possible expansion of the groundwater monitoring well network that would come with combining the storage basins as a single discharge point along with the maturation ponds as another single discharge point.

RESPONSE: Staff do not concur with the Discharger's request to remove Discharge Points 002 and 003. Without fully lined and maintained storage ponds, discharge to the subsurface beneath the ponds is occurring and with the available data and information a conclusion cannot be made as to the quantity of wastewater discharge from the ponds or impacts to groundwater. Therefore, staff have added Discharge Points 002 and 003 and additional monitoring and reporting in the proposed Order to best determine impacts, if any, to groundwater from the Tertiary Storage Basin 1 and 2 and Maturation Ponds 1 and 2.

Central Valley Water Board staff concur with the Discharger's request to combine Tertiary Storage Basins 1 and 2 into Discharge Point 002 and Maturation Ponds 1 and 2 into Discharge Point 003 and removal of the liner integrity and maintenance reporting for the reasons provided by the Discharger above. Staff have revised the proposed Order sections shown below to incorporate both Tertiary Storage Basin 1 and Tertiary Storage Basin 2 into Discharge Point 002 and Maturation Pond 1 and Maturation Pond 2 into Discharge Point 003 throughout the proposed Order as appropriate.

Modify section IV.B.1 of the Waste Discharge Requirements (WDRs) to the following:

1. Beginning 1 June 2024, the Discharger shall maintain compliance with the following effluent limitations for discharge to Tertiary Storage Basin 1 and Tertiary Storage Basin 2, with compliance measured at monitoring location LND-001 and Maturation Pond 1 and Maturation Pond 2, with compliance measured at monitoring location LND-002, as described in the attached MRP. The Discharger shall maintain compliance with the effluent limitations specified in Table 6.

Remove sections VI.C.2.c Annual Pond Liner Assessment Report and VI.C.2.d Pond Liner Integrity Assessment Report from the WDRs.

Modify Table E-1 Monitoring Station Locations of Attachment E – Monitoring and Reporting Program as shown in part below:

002	LND-001	Land discharge monitoring location where a representative sample of the effluent from the Treatment Facility can be collected prior to discharge into Tertiary Storage Basin 1 and/or Tertiary Storage Basin 2. Latitude: 38° 51' 38" N Longitude: 121° 20' 55" W

003	LND-002	Land discharge monitoring location at the Maturation Pond Pump Station where a representative sample of process water can be collected prior to discharge into Maturation Pond 1 and/or Maturation Pond 2. Latitude: 38° 51' 40" N Longitude 121° 20' 51" W

Remove liner integrity and maintenance reports numbered 20 through 25 from Table E-15 Technical Reports of Attachment E – Monitoring and Reporting Program.

Modify section II.A.1.b, bullet two of Attachment F – Fact Sheet as shown below:

- Two maturation ponds, which are designed to equalize flow within the treatment process, effluent temperatures with receiving water temperatures, and to effectively equalize effluent concentrations. The maturation ponds operate as one unit as these can be operated in parallel and/or in a series. Maturation Pond 1's slopes are lined with high-density polyethylene (HDPE) and Maturation Pond 2 is completely lined with a single 60-mil HDPE liner, but not double lined with leak detection. Due to use, exposure to the weather, and other factors, liners can degrade in time and result in unregulated discharges to groundwater. The liners in Maturation Ponds 1 and 2 were installed to aid in the maintenance of the ponds, not to prevent percolation of process water to groundwater. Therefore, for the above-mentioned reasons this Order considers both Maturation Ponds 1 and 2 a combined discharge point to groundwater;

Modify section II.A.1.b, bullet seven of Attachment F – Fact Sheet as shown below:

- Two existing storage basins for holding tertiary treated effluent from the Facility labeled as Tertiary Storage Basin 1 and 2 (capacity of 90 MG each). The Tertiary Storage Basins operate as one unit as these can be operated in parallel and/or in a series. Tertiary Storage Basin 1 slopes on the north and west are lined to prevent wave erosion. Tertiary Storage Basin 2 is fully lined with single 60-mil HDPE, but not double lined with leak detection. Due to use, exposure to the weather, and other factors, liners can degrade in time and result in unregulated discharges to groundwater. The liners in Tertiary Storage Basins 1 and 2 were installed to aid in the maintenance of the basins, not to prevent percolation of process water to groundwater. Therefore, for the above-mentioned reasons this Order considers both Tertiary Storage Basins 1 and 2 a combined discharge point to groundwater;

Modify the five sentences of section IV.B.4.b. Groundwater, Attachment F – Fact Sheet as shown below:

b. **Groundwater.** The Discharger utilizes a partially lined maturation pond and a fully lined maturation pond and a partially lined tertiary wastewater storage pond and a fully lined tertiary wastewater storage pond. The partially lined and fully

> lined tertiary wastewater storage ponds (Tertiary Storage Basin 1 and 2, respectively) are designed to store tertiary treated wastewater before discharge to Auburn Ravine creek or the reclamation system. However, because Tertiary Storage Basin 1 is not completely lined and both Tertiary Storage Basin 1 and 2 liners were designed for pond maintenance and levee integrity, not leak prevention, discharge to the groundwater beneath the ponds may occur. The partially lined and lined maturation ponds (Maturation Pond 1 and 2, respectively) are designed to equalize flow within the Facility, to equalize effluent temperatures with receiving water temperatures, and to equalize constituent concentrations in the process water. However, because Maturation Pond 1 is not completely lined and both Maturation Pond 1 and 2 liners were designed for pond maintenance and levee integrity, not leak prevention, discharge to the groundwater beneath the ponds may occur.

Remove sections VI.B.2.b Annual Pond Liner Assessment Report and VI.C.2.c Pond Liner Integrity Assessment Report from Attachment F – Fact Sheet.

DISCHARGER COMMENTS #s 2-6, 8-12, 14, 17-20, 23-33, 35-42: The Discharger submitted 33 minor comments on the tentative amending order, including editorial changes, cross-references, and typographical corrections.

RESPONSE: Central Valley Water Board staff concur and have revised the proposed Order accordingly.

DISCHARGER COMMENT #7: Please add language to Section VII, Compliance Determination, that instrument failures will not be considered a Notice of Violation (NOV). Regional Board Enforcement staff said they have a version of this language, and it must be in the permit to apply.

RESPONSE: Staff do not concur. Compliance and Enforcement Staff indicated that they do not have the requested language, but Compliance and Enforcement Staff do have discretion regarding issuance of NOVs for instrumentation failures depending on the supporting information provided by the Discharger**.**

DISCHARGER COMMENT #13: It is requested that note f on section IV.B.2 of the MRP be clarified to be EFF-001B (as Discharge Point 001 is defined as EFF-001A and EFF-001B).

RESPONSE: Staff do not concur. The intention of the note is to compare the influent and effluent of the Tertiary Storage Basins. Furthermore, there is no monitoring for electrical conductivity at EFF-001B.

DISCHARGER COMMENT #15: Please clarify the value of chloride sampling at this sampling location or remove it from Table E-6.

RESPONSE: Chloride is a stable tracer for municipal wastewater effluent; therefore, to monitor the potential discharge of wastewater to groundwater from Discharge Points 002 and 003, chloride monitoring is included in Table E-6.

Attachment F – Fact Sheet, section VII.E.3 Pond Monitoring of the proposed Order has been revised as shown below to provide the rationale for chloride monitoring:

> 3. **Pond Monitoring**
>
> Pond monitoring is required to ensure proper operation of the Maturation Ponds and Tertiary Storage Basins per the Facility Pond Operating Requirements in section VI.C.4.c of this Order. Weekly monitoring for presence of water, discharge to storage pond, freeboard, dissolved oxygen, and pond conditions are included in this Order. Chloride is a stable tracer for municipal wastewater effluent, therefore to monitor the potential discharge to groundwater from the Facility's Ponds, this Order requires quarterly monitoring for chloride at the Tertiary Storage Basins and Maturation Ponds.

In the tentative Order, Table E-6 included chloride as part of the standard minerals and separately as its own parameter. Staff have removed specific parameter monitoring for chloride in Table E-6 of Attachment E – Monitoring and Reporting Program. The chloride monitoring frequency in Table E-6 has been revised to quarterly from monthly to match the chloride groundwater monitoring well frequency. Section VI.A.2.d of Attachment E – Monitoring and Reporting Program has been modified to the following:

> d. **Standard minerals (except for Chloride)** shall be sampled quarterly for the first two years after the effective date of this Order, but can be reduced to an annual monitoring frequency after the two year period.

DISCHARGER COMMENT #16: It is not believed to be necessary to require chloride sampling in Tables E-6 and E-7.

RESPONSE: Staff do not concur. The proposed Order requires chloride monitoring to the ponds and in the ponds to determine the possible impacts evaporation, rainfall, etc. have on chloride concentrations in the ponds to determine if future monitoring of the land discharge points should be maintained, reduced or removed.

DISCHARGER COMMENT #21: Please add the sentence, "The Discharger is not required to sample and analyze for asbestos." as a note to Table E-13.

RESPONSE: Staff do not concur. Asbestos is a California Toxics Rule parameter, number 15, which is one of the 126 parameters that the Board requires to be sampled during the permit term consistent with the Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (2005) and 40 C.F.R. § 122.21(j)(4), to evaluate reasonable potential during the next permit renewal. Asbestos monitoring is excluded from pretreatment monitoring of the influent and effluent, not the effluent and receiving water characterization monitoring.

DISCHARGER COMMENT #22: Please list the Pond Liner Integrity Assessment Report under the items required to be included in the ROWD for completeness.

RESPONSE: Comment 22 was addressed as part of Discharger Comment 1. Please see Discharger Comment 1.

DISCHARGER COMMENT #34: For Table F-16, the instantaneous minimum and maximum pH effluent limitations are 6.5 and 8.5, respectively.

RESPONSE: Staff do not concur. The requested changes represent the water quality-based effluent limitations for pH. Table F-16 represents the technology-based effluent limitations for pH which are 6.0 and 9.0, as indicated in the tentative Order and maintained in the proposed Order.

JOANNE KIPPS COMMENTS

JOANNE KIPPS COMMENT #1

Please clarify the 85% BOD_5 /TSS removal requirement and monitoring location. Why does the tentative order move effluent limitations for ammonia and nitrate plus nitrite from Discharge Point 001 (EFF-001A) to Monitoring Location INT-001? Which of the effluent limitations in Section IV.A are subject to Minimum Mandatory Penalties?

RESPONSE: Central Valley Water Board Staff have modified Attachment F – Fact Sheet, paragraph four of section IV.B.2.a to clarify the 85% BOD_5 /TSS removal requirement and monitoring location as shown below:

> Section 133.102 of 40 C.F.R., in describing the minimum level of effluent quality attainable by secondary treatment, states that the 30-day average BOD5 and TSS percent removal shall not be less than 85 percent. However, wastewater held in Tertiary Storage Basins 1 and 2 is no longer part of the treatment process, but may be held for a period longer than 30 days before discharge to Auburn Ravine Creek, making the 30-day average percent removal determination after treatment infeasible at times. Therefore, this Order contains a limitation requiring an average of 85 percent removal of BOD5 and TSS over each calendar month, applicable at internal monitoring location INT-001. Monitoring location INT-001 provides a feasible monitoring location to determine the 30-day average BOD5 and TSS percent removal following completion of the tertiary treatment process by comparing the influent BOD5 and TSS concentrations with the post tertiary treatment process BOD5 and TSS concentrations.

The tentative Order moved effluent limitations for ammonia and nitrate plus nitrite from Discharge Point 001 (EFF-001A) to Monitoring Location INT-001 because INT-001 represents the discharge point of the tertiary treatment system; however, this is not the appropriate point for determining compliance when discharging to surface water for these constituents. EFF-001A is the appropriate location because it represents the

quality of effluent being discharged to surface water since the discharge can be a mix of effluent from the tertiary treatment system, the Tertiary Storage Basins or one or the other, not just the effluent from the tertiary treatment system. Therefore, Staff have revised the proposed Order to revert the ammonia and nitrate plus nitrite limits back to EFF-001A, as they were in Order R5-2018-0082, along with the respective monitoring and reporting requirements from INT-001 to EFF-001A as shown below and throughout the proposed Order as necessary:

Remove ammonia and nitrate limits from Table 4. Effluent Limitations – Filter Clearwell Internal Waste Stream Compliance Point (Monitoring Point INT-001) and add them to Table 5. Effluent Limitations EFF-001A of the WDRs as follows:

Table 5. Effluent Limitations – EFF-001A

Parameter	Units	Average Monthly	Average Weekly
Biochemical Oxygen Demand, 5-day @ 20°Celcius (BOD_5)	milligrams per liter (mg/L)	30	45
Total Suspended Solids (TSS)	mg/L	30	45
Ammonia (as N)	mg/L	1.2	2.8
Nitrate Plus Nitrite (as N)	mg/L	10	17

Remove ammonia and nitrate plus nitrite monitoring and reporting from Table E-3. Effluent Monitoring – Monitoring Location INT-001 and add them to Table E-4. Effluent Monitoring – Monitoring Location EFF-001A of Attachment E – Monitoring and Reporting Program as shown in part below:

Table E-4. Effluent Monitoring – Monitoring Location EFF-001A

Parameter	Units	Sample Type	Minimum Sampling Frequency
Ammonia (as N)	mg/L	Grab	1/Week
Nitrate (as N)	mg/L	Grab	1/Month
Nitrite (as N)	mg/L	Grab	1/Month
Nitrate plus Nitrite (as N)	mg/L	Calculate	1/Month

All effluent limitations included in section IV.A Effluent Limitations of the WDRs are subject to mandatory minimum penalties because they have been identified as effluent limitations in this proposed Order. Monitoring location nomenclature or location within the treatment system does not override section IV.A Effluent Limitations specifying where the compliance point is within the treatment system and specifically the applicable limitation or limitations to that compliance point.

JOANNE KIPPS COMMENT #2

Discharge Point 003 in Table 2, Discharge Location, has the same latitude and longitude for monitoring locations EFF-001A and LND-001. Shouldn't it be the same as LND-002 (Latitude: 38°51'36"N, Longitude: 121°21'01"W)? The Flow Schematic, Attachment C, does not identify D-002, LND-002 (below EFF-001A), D-003, and LND-001.

RESPONSE: Central Valley Water Board staff concur. Staff have revised the proposed Order to correct the longitude and latitude for Discharge Points 002 and 003 as updated by the Discharger, along with a revised Flow Schematic that identifies Discharge Points 002 and 003 as well as LND-001 and LND-002, as follows and throughout the proposed Order as appropriate:

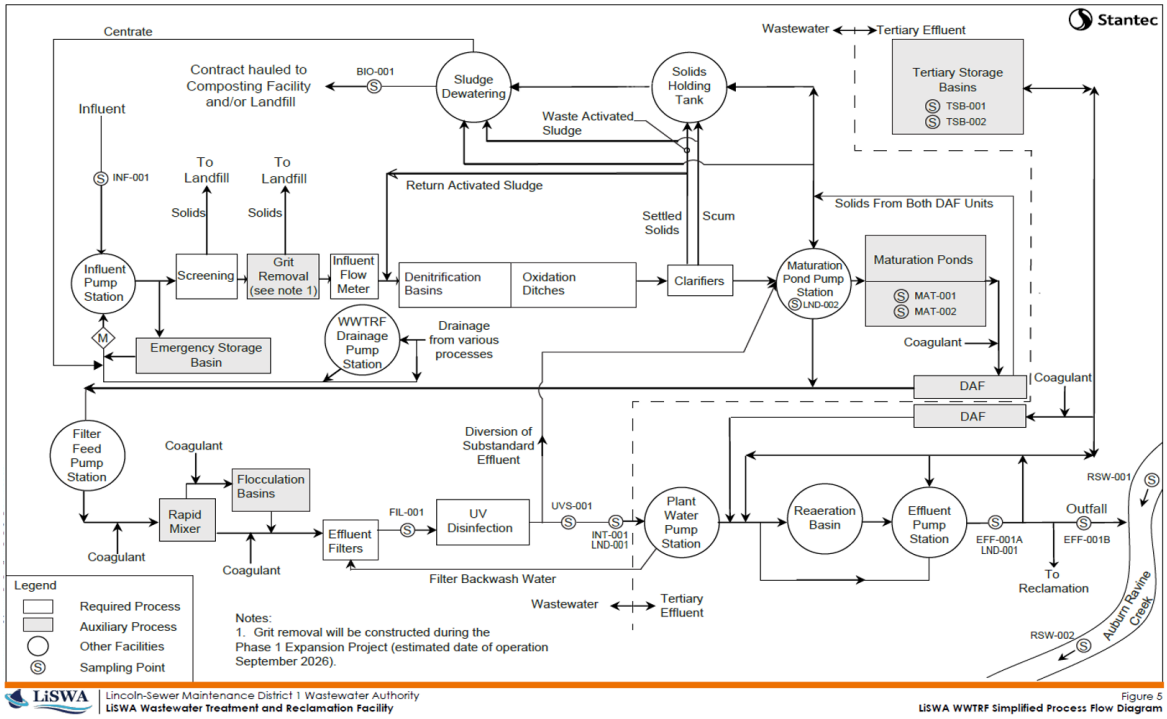
Table 2. Discharge Locations of the WDRs has been modified to the following:

Table 2. Discharge Location

Discharge Point	Effluent Description	Discharge Point Latitude (North)	Discharge Point Longitude (West)	Receiving Water
001	Tertiary Treated Effluent	38° 51' 05"	121° 21' 23"	Auburn Ravine Creek
002	Tertiary Treated Effluent	38° 51' 38"	121° 20' 55"	Groundwater
003	Secondary Treated Effluent	38° 51' 40"	121° 20' 51"	Groundwater

Attachment C – Flow Schematic has been updated with the following diagram:

ATTACHMENT C – FLOW SCHEMATIC



JOANNE KIPPS COMMENT #3

Tertiary Storage Basin 1 receives only disinfected tertiary effluent, why doesn't the Land Discharge Specification for BOD5 reflect tertiary treatment for Discharge Point 002 (i.e., 10 mg/L average monthly and 15 mg/L average weekly)? Since nitrogen removal treatment generally results in low effluent BOD5, consider eliminating the BOD5 limitation altogether in the Land Discharge Specification. In other words, the effluent limitation of 10 mg/L for nitrate (as N) generally assures that effluent BOD5 concentrations will consistently be below 30 mg/L, rendering the proposed BOD5 limitation unnecessary.

And, consider implementing the effluent EC trigger of 700 umhos/cm (calendar average) as a performance-based salinity effluent limitation in Table 6, applicable to both Discharge Point 002 and Discharge Point 003.

RESPONSE: Central Valley Water Board staff concur that the BOD5 land discharge specification should be 10 mg/L average monthly and 15 mg/L average weekly at Discharge Point 002, since the wastewater has been tertiary treated prior to this discharge point. However, as Ms. Kipps points out that nitrogen removal treatment results in low effluent BOD5, the highest average monthly BOD5 last permit term was 6.9 mg/L; therefore, as Ms. Kipps recommends, the land discharge specifications for BOD5 are unnecessary with inclusion of the 10 mg/L nitrate effluent limitation. Staff

have revised Table 6 of the WDRs to remove the BOD5 average monthly and weekly land discharge specifications.

Staff also concur that an EC trigger should be included for Discharge Points 002 and 003; therefore, Staff have revised the proposed Order to include an effluent EC trigger of 700 umhos/cm (calendar average) for monitoring locations EFF-001A, LND-001, and LND-002 to section VI.C.3.a of the WDRs, as shown below and throughout the proposed Order as appropriate.

> **3. Best Management Practices and Pollution Prevention**
>
> a. **Salinity Evaluation and Minimization Plan (SEMP).** The Discharger shall continue to implement a SEMP to identify and address sources of salinity discharged from the Facility. An evaluation of the effectiveness of the SEMP shall be submitted with the ROWD. The evaluation shall include, at minimum, the calendar annual average concentrations of effluent electrical conductivity during the term of the Order. If the average electrical conductivity concentration for any calendar year exceeds a performance-based **trigger of 700 µmhos/cm** at monitoring locations EFF-001A, LND-001, and/or LND-002, the Discharger shall evaluate possible sources of salinity contributing to the exceedance of the trigger and update the SEMP to include a plan of action to control salinity.

JOANNE KIPPS COMMENT #4

Please revise the proposed Order to provide for the Tertiary Storage Basins and Maturation Ponds: pond area (acres), working liquid depth (feet), pond invert elevations (feet amsl), and vertical separation distance (feet) between pond invert and highest anticipated groundwater.

RESPONSE: Central Valley Water Board staff concur. Staff received the requested information from the Discharger and revised Attachment F – Fact Sheet, section II.A as shown below.

> 2. **Pond Area**
>
> a. **Maturation Ponds 1 and 2**
>
> - Maturation Pond 1 is 19.5 acres at maximum water surface (less area at reduced depths).
>
> - Maturation Pond 2 is 20.8 acres at maximum water surface.
>
> b. **Tertiary Storage Basins 1 and 2**

- Tertiary Storage Basin 1 and 2 are 20.7 acres and 21.9 acres, respectively, at maximum water surface.

3. **Pond Working Liquid Depths**

   a. **Maturation Ponds 1 and 2**

   - High water level elevation is 114.0 feet above mean sea level (AMSL) with 2 feet overflow freeboard. The low water level elevation is 96.5 feet AMSL, drained.

   - Working depth is 0 feet to 17.5 feet with overflow freeboard. Working depth is usually 10 feet to 12 feet to retain equalization storage capacity.

   b. **Tertiary Storage Basins 1 and 2**

   - High water level elevation is 123.0 feet AMSL. Low water level elevation is 108.5 feet AMSL, usually 110.5 feet to prevent plant growth in Tertiary Storage Basin 1.

   - Working Depth 13.5 feet in Tertiary Storage Basin 1 and 15.5 feet in Tertiary Storage Basin 2 when fully drained.

4. **Pond Invert Elevations**

   a. **Maturation Ponds 1 and 2**

   - 96.5 feet AMSL at the lowest point (floor slopes up).

   b. **Tertiary Storage Basins 1 and 2**

   - 108.5 feel AMSL at the lowest point (floor slopes up).

5. **Vertical Separation Distance Between Pond Invert and Highest Anticipated Groundwater**

   Groundwater elevations vary over time, as do projected groundwater gradients between monitoring wells

   a. **Maturation Ponds 1 and 2**

   - Groundwater Monitoring Well MW-2 appears most in line with Maturation Ponds 1 and 2 and indicates a maximum recorded groundwater elevation of 85.0 feet AMSL.

- The minimum vertical separation between pond inverts and groundwater is 11.5 feet.
- The average groundwater elevation is approximately 78 feet AMSL.
- The average separation is approximately 18.5 feet.

b. **Tertiary Storage Basins 1 and 2**

- Groundwater Monitoring Well MW-4 appears most in line with the Tertiary Storage Basins 1 and 2 and indicates a maximum recorded groundwater elevation of 96.0 feet AMSL.
- The minimum vertical separation between the Tertiary Storage Basins invert and groundwater is 12.5 feet.
- The average groundwater elevation is approximately 88 feet AMSL.
- The average separation is approximately 20.5 feet.

JOANNE KIPPS COMMENT #5

Please revise the Draft to carry over the Current Order's language regarding metals.

RESPONSE: Central Valley Water Board staff concur. Staff have revised the proposed Order, in Attachment F – Fact Sheet, section II.B.4 as shown below.

4. Secondary treated, undisinfected municipal wastewater is discharged to groundwater at Discharge Point 003 from Maturation Ponds 1 and 2 at an approximate latitude of 38° 51' 40" N longitude 121° 20' 51" W. Discharge to groundwater occurs when process water is stored in Maturation Ponds 1 or 2, which are treatment ponds designed to equalize flow within the Facility, to equalize effluent temperatures with receiving water temperatures, and to effectively equalize effluent concentrations of conservative contaminants, such as metals in the process water.

JOANNE KIPPS COMMENT #6

Please revise Table F-5 to identify groundwater beneficial uses as existing. Or, provide technical and regulatory justification for identifying apparent existing groundwater beneficial uses as potential.

RESPONSE: Central Valley Water Board staff concur with identifying the beneficial use as existing and have revised Table F-5 of Attachment F – Fact Sheet of the proposed Order as shown in part below.

Table F-5 Basin Plan Beneficial Uses

Discharge Point	Receiving Water Name	Beneficial Use(s)
002 and 003	Groundwater	Existing: Municipal and domestic water supply (MUN); agricultural supply (AGR); industrial service supply (IND); and industrial process supply (PRO).

JOANNE KIPPS COMMENT #7

Please consider including an Order attachment specifying groundwater well work plan and installation reporting information in the attachment common to land discharge WDRs, *Standard Requirements for Monitoring Well Installation Work Plans and Monitoring Well Installation Reports* (see Attachment E in WDR Order R5-2021-0025 for the City of Corcoran WWTF, Kings County).

RESPONSE: Central Valley Water Board staff concur and have revised the proposed Final Order to add Attachment I - Standard Requirements for Monitoring Well Installation Work Plans and Monitoring Well Installation Reports, with similar requirements to Attachment E in WDR Order R5-2021-0025 for the City of Corcoran WWTF, Kings County. Section VI.C.2.b Groundwater Monitoring Well Network Evaluation Report of the WDRs was revised to incorporate the requirements of Attachment I as shown below:

b. **Groundwater Monitoring Well Network Evaluation Report.** The Discharger shall conduct an assessment of the current groundwater monitoring well network and propose additional wells, where necessary, to characterize groundwater gradient and quality near and downgradient from Tertiary Storage Basins 1 and 2 and Maturation Ponds 1 and 2, and, if necessary, to better characterize background concentrations. The report shall include a project schedule not to exceed one year, include, if necessary, a closure plan for the decommissioning of existing wells, and satisfy the information requirements, as part of the Groundwater Monitoring Well Network Evaluation Report. The Discharger must submit the Groundwater Monitoring Well Network Evaluation Report to the Central Valley Water Board on the date provided in the Technical Reports Table of the MRP (Attachment E).

   i. **Groundwater Monitoring Well Installation Work Plan (if necessary).** If the Discharger determines there is a need to install new groundwater monitoring wells, then the Discharger shall follow the requirements of Attachment I – Standard Requirements for Monitoring Well Installation Work Plans and Monitoring Well Installation Reports and provide a Groundwater Monitoring Well Installation Work Plan to the Central Valley

Water Board by the date provided in the Technical Reports Table of the MRP (Attachment E).

ii. **Groundwater Monitoring Well Installation Report (if necessary).** If the Discharger determines there is a need to install new groundwater monitoring wells, then the Discharger shall follow the requirements of Attachment I – Standard Requirements for Monitoring Well Installation Work Plans and Monitoring Well Installation Reports and provide a Groundwater Monitoring Well Installation Report to the Central Valley Water Board by the date provided in the Technical Reports Table of the MRP (Attachment E).

If the Discharger determines there is a need to install new groundwater monitoring wells, then the Discharger shall follow the monitoring requirements for groundwater monitoring wells in Attachment E – Monitoring and Reporting Program, section VIII.B.

JOANNE KIPPS COMMENT #8

The Facility is near two surface water drainages, so it is unclear why the tentative order indicates otherwise.

RESPONSE: The language Attachment F – Fact Sheet, section III.E.1, paragraph four, sentence four is ambiguous as pointed out by Ms. Kipps and has been revised in the proposed Order as follows for clarity:

> There are no ponds or lakes in the immediate vicinity of the Facility, except for seasonal rice fields and the Facility's treatment plant ponds.

JOANNE KIPPS COMMENT #9

F-68, Item B. Effluent Monitoring, item 5. Second sentence should read: This Order requires effluent monitoring for Ammonia once per week at Monitoring Location ~~EFF-001A~~ **INT-001**. (if that is what staff decides).

RESPONSE: Staff would have made the proposed correction by Ms. Kipps; however, Staff revised the compliance point for ammonia to EFF-001A from INT-001. Therefore, no change was required to the proposed Order.

JOANNE KIPPS COMMENT #10

F-74, E.3. Consider revising:

~~Treatment pond~~ *Pond* monitoring is required to ensure proper operation of the ~~storage Pond~~ *Maturation Ponds and Tertiary Storage Basins*. Weekly monitoring for presence of water, discharge to storage pond, freeboard, dissolved oxygen, and pond conditions are included in this Order*, along with monthly monitoring for chloride*.

RESPONSE: Staff concur and revised Attachment F – Fact Sheet section VII.E.3 Pond Monitoring of the proposed Order as shown below:

3. **Pond Monitoring**

   Pond monitoring is required to ensure proper operation of the Maturation Ponds and Tertiary Storage Basins per the Facility Pond Operating Requirements in section VI.C.4.c of this Order. Weekly monitoring for presence of water, discharge to storage pond, freeboard, dissolved oxygen, and pond conditions are included in this Order. Chloride is a stable tracer for municipal wastewater effluent, therefore to monitor the potential discharge to groundwater from the Facility's Ponds, this Order requires quarterly monitoring for chloride at the Tertiary Storage Basins and Maturation Ponds.

JOANNE KIPPS COMMENT #11

F-74, E.4. Consider revising:

Land discharge monitoring is required to ensure that the discharge to *Maturation Pond 1 and Tertiary Storage Basin 1* ~~the land disposal area~~ complies with *the Land Discharge Specification in section IV.B.1 of this Order*. ~~Storage Pond and Land Disposal Operating Requirements in section VI.C.4 of this Order.~~ *This Order includes weekly* ~~Weekly~~ monitoring for flow, BOD5~~, total suspended solids~~, pH, *nitrate (as N),* ~~total nitrogen~~, electrical conductivity*; monthly monitoring for total nitrogen and chloride; and annual monitoring for standard minerals*.

RESPONSE: Staff concur and have revised Attachment F – Fact Sheet section VII.E.4 Land Discharge Monitoring of the proposed Order as shown below:

4. **Land Discharge Monitoring**

   Land discharge monitoring is required to ensure that the discharge to Maturation Ponds 1 and 2 and Tertiary Storage Basins 1 and 2 complies with the Land Discharge Specifications in section VI.B.1 of this Order. This Order includes monitoring for flow (daily), BOD5 (weekly), pH (weekly), nitrate (as N) (weekly), electrical conductivity (weekly), total nitrogen (monthly), chloride (quarterly), and standard minerals (annual).

JOANNE KIPPS COMMENT #11

What is the reference(s) for the cited past geotechnical data? (Page F-6)

RESPONSE: The reference to “past geotechnical data” was included in error in the tentative Order. Staff removed the referenced text from the proposed Order.