

RESPONSE TO COMMENTS

A Tentative Amendment to Waste Discharge Requirements (WDRs) and Cease and Desist Order (CDO) for
City of Santa Paula, Santa Paula Water Recycling Facility (SPWRF)

Comment Deadline: April 18, 2022

List of Commenters:

Comment No.	Commenter	Date Received
1	City of Santa Paula	April 12, 2022

Response to Comments:

No.	Comment	Response
1-1	On March 18, 2022, the California Water Quality Control Board Los Angeles Region (Regional Board) issued Tentative Waste Discharge Requirements (Tentative WDRs) and a Cease and Desist Order (CDO) for the Santa Paula Water Recycling Facility (WRF) to address changes in the City's approach to achieving compliance with chloride requirements in the WDRs. The City of Santa Paula (City) appreciates the opportunity to provide the following comments and recommendations to the Regional Board.	Comment noted.
1-2	As stated in the Public Notice dated March 18, 2022, and as discussed with you and your staff, the City changed its approach in March 2020 to achieving compliance with chloride effluent limitations from pursuing a recycled water program to	Comment noted.

No.	Comment	Response
	installing advanced treatment at WRF. Therefore, in addition to changed proposed in the Tentative WDR, the Cease and Desist Order (CDO, Order No. R4-2018-0023) is being modified to include interim milestones and interim effluent limitations that are consistent with this approach.	
1-3	The City appreciates the modification to the final chloride limit in the Tentative WDRs from a mass based limit to the concentration based limit of 110 mg/L. Additionally, the City appreciates the modification of the final interim effluent limitation in the CDO to a concentration based limit and elimination of intermediate changes in interim limits between now and 2025 to be more consistent with the schedule needed to complete construction of the advanced treatment system.	Comment noted.
1-4	<p>However, the City Respectfully requests that the following comments and modifications to the CDO and WDR be considered:</p> <p>CEASE AND DESIST ORDER (CDO)</p> <p>The City would request that the current interim limit of 1,983 lb./day be revised to a concentration based limit of 125 mg/L. The mass based interim effluent limitations were based on the assumption that discharge flows would decrease as the recycled water program was implemented and recycled water users were added. However, flows will not decrease, chloride concentrations are expected to stay the same or decrease because the added volume will not include discharge from</p>	<p>The interim effluent limitation for chloride was re-evaluated based on SPWRF's treatment performance basis. According to the effluent data from 2018, the SPWRF reduced chloride mass discharge to the groundwater basin by 12% to 53%. The chloride mass reduction in the effluent in 2021 was approximately 33%. This mass reduction has been achieved by the City's efforts, such as the self-regenerating water softener (SRWS) buyback program and the Ordinance to prohibit new installation of SRWS.</p> <p>However, the data indicated that chloride concentrations in the effluent fluctuated due to</p>

No.	Comment	Response
	residential water softeners. New residential water softeners are prohibited by the City's Ordinance.	<p>seasonal influent flow variation. In addition, the SPWRF does not have flow control measures.</p> <p>By considering above-mentioned factors, it is reasonable to maintain the current interim mass limitation for chloride and require compliance with a 12-month running average of the monthly average values, as stated in footnote 6 of Table 3. Therefore, Table 3 will remain as proposed in the tentative CDO.</p>
1-5	<p>In addition, a concentration-based interim limit would be more consistent with measuring the impact of the effluent on the groundwater and the nearby agricultural wells of concern. Regardless of the total mass discharged, the primary indicator of impact to groundwater within 150 ft. of the SPWRF will be concentration. Modeling and direct measurement both indicate that the chloride concentrations at 150 ft. (i.e., location of nearby agricultural wells of concern) will be essentially the same as the influent concentration in the absence of other chloride sources to the groundwater basin.</p>	<p>The purpose of the CDO is to reduce chloride mass loadings discharged from the SPWRF to the groundwater basin to protect beneficial uses. To meet requirements for the Antidegradation Policy, the groundwater mixing zone was temporarily accepted until the City fully implements the recycled water program.</p> <p>Unless the City provides a revised antidegradation analysis on the proposed interim concentration-based limitation to support protection of beneficial uses or until the advanced treatment system is in operation, the mass-based limitation remains in effect.</p>
1-6	<p>If the interim limit remains at 1,983 lb./day, the City requests the following clarifications be made with respect to the CDO interim limits in Table 3:</p>	<p>As responded to comments Nos. 1-4 and 1-5, the mass-based interim effluent limitation for chloride remains in effect.</p>

No.	Comment	Response
	<ul style="list-style-type: none"> We appreciate the recalculation of the effluent interim limit to 1,983 lb./day and implementing it as a running annual average. However, footnote 6 is not entirely clear as to how compliance is determined. We would suggest clarifying how compliance is determined by revising the footnote as follows <i>Compliance with the effluent limitation is based on an annual monthly <u>12 month running average of the monthly average values</u>. For example, to meet the July 1, 2022 compliance date, to comply with the interim limit of 1983 lb./day for July 1, 2022, the average of the 12 monthly average values reported from July 2021 to June 2022 must be no greater than 1,983 lbs./day.</i> 	<p>The footnote 6 of Table 3 in the tentative CDO will be modified as proposed by the City.</p>
1-7	<ul style="list-style-type: none"> It is possible that other discharges/conditions may influence groundwater quality in the groundwater monitoring wells. Therefore, for the groundwater limitations in Table 3, to be consistent with the WDRs compliance language, we request a footnote be added to state that: <i>The discharge of treated wastewater from the SPWRF shall not cause an exceedance of the groundwater limitations in Table 3.</i> <p>This language is consistent with the language in the tentative WDRs in Section III.B. above Table 9 (Groundwater Limitations).</p>	<p>The first sentence in compliance requirements No. 2, immediately above Table 3 in the tentative CDO No. R4-2018-0023-A01 will be modified as proposed by the City.</p>

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1-8	<p>WASTE DISCHARGE REQUIREMENTS (WDRs)</p> <p>The City also respectfully requests the following modifications to the WDRs primarily for clarification and correction:</p> <ul style="list-style-type: none"> Paragraph 17.C. has been updated to reflect the current status of the SRWS Buyback Program. The last paragraph states: <p style="margin-left: 40px;"><i>A reliable decreasing trend for chloride has not been observed in the effluent.</i></p> Table 3 indicates that the annual average chloride concentrations in 2010-2014 ranged from 145 to 156 and decreased to 131-137 mg/L in 2015-17. Further decreases have been seen from 2018-2020 when the average annual chloride concentration ranged from 119-121 and the average annual chloride concentration in 2021 was 112 mg/L. Because a decreasing trend has been observed, the City requests that the last sentence in Paragraph 17.C. be deleted. 	<p>The <i>Self-Regenerating Water Softener Buyback Program Evaluation Report</i> dated May 2018 concluded that effluent chloride loads have been decreasing but the anticipated reduction of chloride concentration in the effluent has not been met. The sentence in the tentative CDO and WDR will be revised as follows:</p> <p><u>Decreasing chloride concentrations in the effluent have been observed, but they still cannot meet the chloride discharge limitation set forth in the WDRs.</u></p>
1-9	<ul style="list-style-type: none"> The City requests that sentences below found in Paragraph 24 be edited as shown: <p>Progress with these efforts will be <u>was</u> assessed in Year 2022-2020, and determination will be <u>was</u> made as to whether <u>pursue</u> advanced treatment will be required to meet the chloride GQO at Year 2017. If advanced treatment is required, effluent limits will be applied in a way</p> 	<p>Paragraph 24 will be modified as requested by the City.</p>

No.	Comment	Response
	<p>to ensure protection of all beneficial uses, including salt-sensitive crops.</p>	
1-10	<ul style="list-style-type: none"> In Paragraph 41.D. (Economic Considerations), the City's wastewater user rates are stated to be \$89.31 per single family residence based on the 'current rates' listed in the City's 2019 Rate Study. This should be updated to reflect the 2021/22 rates in the study which are \$98.55, and the second highest rates of all the cities in Ventura County. 	<p>The Regional Water Board has reviewed the monthly wastewater user rates estimated for 2021/2022 based on the <i>City of Santa Paula Water and Sewer Rate Study Final Report</i> dated September 2019 and agrees to change the monthly wastewater rate use per single family residence to \$98.55, as proposed.</p>