Response to Written Comments
and
Staff Initiated Changes

Draft Waste Discharge Requirements Order No. R1-2018-0001
National Pollutant Discharge Elimination System (NPDES)
for the Graton Community Services District
Wastewater Treatment, Recycling and Disposal Facility (Facility)

Regional Water Quality Control Board, North Coast Region

Comment Letter Received:
The deadline for submission of public comments regarding draft Waste Discharge Requirements Order No. R1-2018-0001, National Pollutant Discharge Elimination System Permit (Draft Permit) for the Facility was November 27, 2017. On November 22, 2017, the Graton Community Services District (Permittee) provided timely comments, which are shown in italics and are followed by the Regional Water Board staff response. No other comments were received. The term "Draft Permit" refers to the draft that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments and is being presented to the Regional Water Board for consideration.

1. *On page E-19 it details groundwater monitoring. We currently have our regular well in our field that we use for water around the plant. We also have 15 or so monitoring wells in different areas all around the field. Will we be able to use our regular well for all the sampling requirements? As for the other wells that are required, do those have to be wells with pumps down in them or can we use the existing monitoring wells for that?*

   Page E-19 of the Proposed Permit requires the development of a groundwater monitoring workplan to be submitted by December 31, 2018. Section VIII.B.1.b on page E-19 of the Monitoring and Reporting Program (MRP) states "If existing wells are proposed for use, the work plan shall provide detailed information about the existing wells, including well construction details, including, but not limited to, well depth, screened interval, date of construction, and well log."

   As long as the existing Facility wells can provide an accurate representation of subsurface conditions, we will not require the Permittee to install additional monitoring wells. Groundwater monitoring is critical to properly evaluate possible impacts to groundwater from Facility discharges and in creating the Storage Pond Technical Report due December 31, 2020.

2. *On page E-18 the permit shows electrical conductivity (EC) testing for RSW-001 and RSW-002. We are wondering why this will be required, and we will need to talk to you at some point to get more information on how to collect these samples.*

   This was an oversight. Regional Water Board staff (Staff) removed the receiving water limitations from section V.A. of the Draft Permit related to Total Dissolved Solids (TDS) and EC to be consistent with receiving water limitations and monitoring requirements for other NPDES Permits in the North Coast Region. However, Staff inadvertently failed to remove the receiving water monitoring requirements from Table E-9 on page E-18 and related language from section VII.E.c. of the Fact Sheet. Thus, Staff removed the monitoring requirements for TDS and EC at the RSW-001 and RSW-002 locations and related Fact Sheet language from the Proposed Permit.

3. *On page E-6, footnote 4 states "Total coliform sampling shall occur daily when discharging to the recycled water distribution system." Is this saying that we need to take a coliform from EFF-001 any time we are irrigating from REC-001 like before, or only if EFF-001 were to be sent directly out for irrigation? In the ROWD we made that case that it should only be if EFF-001 were to be sent directly out for irrigation, but I'm not sure on the wording here in the new permit which case applies.*

   Coliform sampling is required at the end of Permittee's disinfection system (EFF-001) to identify the coliform concentration that most represents treatment performance. If coliform sampling was required at REC-001, the sample would likely not be representative of treatment achieved as the sample could be impacted by other sources of coliform in the storage ponds.

   Title 22, Division 4, Chapter 3, Article 3, Section 60304 discusses the uses allowed for recycled water for irrigation. Information submitted in the Permittee's ROWD states that the majority of recycled water produced by the Permittee is used on "fodder and fiber crops and pasture for animals not producing milk for human consumption". According to section 60304 (d), this use type does not require tertiary treatment. Therefore, weekly coliform sampling is appropriate when the Permittee is sending recycled water to a use type described in section 60304(d) or when discharging to receiving waters.

   Title 22, Section 60304(a) discusses the use types that require disinfected tertiary treatment. This use type does require daily coliform monitoring to determine the public health risk related to human consumption or contact. The intent of footnote 4, on page E-6, is to provide monitoring relief when the Permittee is not recycling to Use Types specified in Section 60304(a).

As such Staff have amended footnote 4 on Table E-5 as follows, "Total coliform sampling shall occur daily when discharging recycled water to any use type specified in Title 22, Division 4, Chapter 3, Article 3, Section 60304(a). This includes any period in the winter season when recycled water is used (dry winter periods, frost protection). Total coliform sampling may be decreased to weekly when discharging to surface waters or recycled water for uses listed in Title 22, Division 4, Chapter 3, Article 3, Section 60304(d)(1) – (7).

The Division of Drinking water was informed of this monitoring requirement and confirmed that Regional Water Board staff has the discretion to include such monitoring in an email from December 8, 2017.

4. *On page F-3 under "Authorized Person to Sign and Submit Reports", it only has my name. John Gibson and Hope Sturges should be listed as well since they are authorized as well.*

Typically, we only list the Legally Responsible Official as the "Authorized Person to Sign and Submit Reports". Staff recognizes that Mr. Gibson and Ms. Sturges are also authorized, through CIWQS, to sign and submit reports. No changes have been made in response to Comment 4.

5. *On page E-21, section 2a still shows reporting requirements for INT-001a. I was under the impression that since we had made the case that since the filters will backwash any time INT-001b reaches 2 NTU that the reporting for INT-001a would no longer be necessary. Also, as long as the daily average for INT-001b is under 2, then the other INT-001b reporting seems unnecessary as well.*

The turbidity monitoring and reporting required at INT-001a and INT-001b is to ensure that the Fuzzy Filter is not overwhelmed and can provide clear water to the pasteurization unit for proper disinfection in accordance with Title 22 requirements. Title 22 requires turbidity monitoring and reporting for tertiary 2.2 recycled water uses. Specifically, Title 22, Division 4, Chapter 3, Article 3, Section 60304(a) states:

"Recycled water used for the surface irrigation of the following shall be a disinfected tertiary recycled water,…coagulation need not be used as part of the treatment process provided that the filter effluent turbidity does not exceed 2 NTU, the turbidity of the influent to the filters is continuously measured, the effluent turbidity does not exceed 5 NTU for more than 15 minutes and never exceeds 10 NTU".

The California Department of Public Health (CDPH) provided conditional acceptance of the Fuzzy Filter on July 14, 2011, in a letter sent to the President of Schrieber LLC. The letter states, "CDPH grants conditional acceptance of the Compressible Media Filter as an alternative treatment technology for recycled water filtration applications, subject to the following conditions:

a. Filtration rates not exceed 30 gpm/ft^2.

b. The filter bed shall be comprised of at least 30-inches of uncompressed filter media.

c. Turbidity in the filtered water shall not exceed an average of 2 NTU within a 24-hour period, 5 NTU more than 5 percent of the time within a 24-hour period, and 10 NTU at any time."

A letter sent by the CDPH on February 24, 2003, includes requirements for the Fuzzy Filter that "Pretreatment processes should be designed and operated to ensure that the turbidity of the influent to the filter does not exceed 10 NTU more than five-percent of the time within a 24-hour period and never exceeds 15 NTU."

To remain in compliance with Title 22 requirements, Staff made no changes to the Proposed Permit in response to Comment 5.

6. *Page E-7 shows that we need to sample TCDD equivalents quarterly from EFF-002. I'm just curious, is this required due to any poor results we had or is this just a new requirement for dischargers? Also, it says quarterly for sampling frequency, so does that mean if we only discharge for 3 months that we would only sample once during the season?*

The Reasonable Potential Analysis (RPA) demonstrated reasonable potential for discharges of TCDD equivalents from the Facility to cause or contribute to exceedances of applicable water quality criteria (WQC). The most stringent WQC for 2,3,7,8-TCDD and TCDD Equivalents is 1.3×10^{-8} µg/L. The maximum effluent concentration (MEC) was 4.19×10^{-7} µg/L for 2,3,7,8-TCDD and the MEC for TCDD Equivalents was 1.70×10^{-6} µg/L. Since the MEC is above the WQC for each contaminant, there is reasonable potential for discharges of TCDD equivalents from the Facility to cause or contribute to exceedances of applicable WQC.

The intent of the quarterly monitoring requirement is to collect one sample during the discharge season. The Proposed Permit has been updated to clarify TCDD sampling requirements of once per discharge season. Table E-11 has been updated

to define “once per discharge season” and Table E-6 has changed quarterly monitoring requirements to once per discharge season. Footnote 16 clarifies once per discharge season term.

7. *On page E-4, we feel that the monitoring location descriptions for INT-002A and INT-002B should be changed to "Pasteurization contact chamber influent" and "Pasteurization contact chamber effluent". The current description of pasteurization preheater influent/effluent is not quite accurate and could be mistaken for another location in the system.*

   Page E-4 has been updated to state “Pasteurization contact chamber influent” and “Pasteurization contact chamber effluent”.

8. *Page E-20, under Effluent Filter Monitoring, states "The Permittee shall calculate, on a daily basis, the surface loading rate in gallons per minute per square foot, and report the maximum surface loading rate and any exceedances of the surface loading rate limitations". The filters are programmed not to allow more than their rating of 30 GPM/sqft at any time, even if we were to set the flow higher than that. We therefore feel that this reporting should not be required.*

   The “Alternative Treatment Technology Report for Recycled Water”, dated September 2014, recognizes the Schreiber Fuzzy Filter as being conditionally accepted for compliance with treatment requirements of the California Water Recycling Criteria. One of the conditions for approvals is that the filtration rate on the Fuzzy Filter shall not exceed 30 gpm/ft^2.

   Continuous monitoring records are required to demonstrate that the Fuzzy Filter surface loading rate of 30 gpm/ ft^{2}is not exceeded. The maximum surface loading rate shall be reported on a daily basis. The system needs to have reliable continuous monitoring and set points. The set points will provide a threshold for recycled water that requires diversion to avoid non-compliant recycled water from entering the recycled water distribution system. As such, Staff did not make any changes to the Proposed Permit in response to Comment 8.