

**Response to Written Comments  
and  
Staff Initiated Changes**

**Draft Waste Discharge and Water Recycling Requirements  
Order No. R1-2018-0035  
National Pollutant Discharge Elimination System (NPDES)  
for the City of Ukiah Wastewater Treatment Plant**

**Regional Water Quality Control Board, North Coast Region  
September 6, 2018**

**Comment Letter Received**

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2018-0035, National Pollutant Discharge Elimination System Permit (Draft Permit) for the City of Ukiah Wastewater Treatment Plant was June 25, 2018. The City of Ukiah (Permittee) provided timely comments. No other comments were received during the public comment period.

In this document, the comments are reproduced in their entirety, followed by the Regional Water Board staff response. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The terms “Draft Permit” and “Tentative Order” refer 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 North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

**City of Ukiah Comments**

**Comment 1:** Monitoring location INT-002 is referenced in multiple locations within the Tentative Order, but is not defined in Attachment E (Monitoring and Reporting Program). INT-002 may be the same sampling point as the location defined for EFF-001A and REC-001. The City requests a description for Location INT-002 in Table E-1 (page E-4) or removal of the references to INT-001 and EFF-001 or REC-001 be substituted for INT-002 monitoring requirements.

**Response 1:** References to INT-002 and EFF-001 were inadvertently left in the Draft Permit. Corrections to replace references to INT-002 with proper references to EFF-001A or REC-001, and references to EFF-001 with proper references to either EFF-001A or EFF-001B have been made in Order Provision IV.A.1.b and IV.D.2.a, Monitoring and Reporting Program (MRP) sections II (Table E-1), IV.B.1, and IX.C, and Fact Sheet sections VII.B, VII.B.1.b, VII.b.1.c, VII.D, and VII.F.2 of the Proposed Permit. In addition, Footnote 1 was added to Table E-1 to read: “EFF-001A and REC-001 are the same location, the sampling point immediately following the chlorine disinfection system. Different discharge point and monitoring location names have been assigned due to differences in monitoring

requirements at Discharge Point 001 (for discharges to the Russian River) and Discharge Point 003 (for discharge to the recycled water system).”

**Comment 2:** As specified in other permits adopted by the North Coast Regional Water Quality Control Board (e.g., City of Healdsburg, Russian River CSD), compliance with groundwater limitations should be based on “statistically significant” impacts to groundwater quality. The City requests that the words, “statistically significant” be included to describe the level of degradation in Groundwater Limitation V.B (page 12).

**Response 2:** The City is correct in pointing out that permit language in the recent past included the words, “statistically significant” to describe the word “degradation” in Groundwater Limitation V.B. The term “statistically significant” was removed from permit language in 2017 because the term appeared to demand a specific type of data evaluation. However, any evaluation of groundwater data must be based on a statistical evaluation of the data to make a determination of whether or not groundwater degradation has occurred. The City can be assured that Regional Water Board staff will not be making arbitrary determinations that degradation has occurred without a robust data set that is analyzed using appropriate statistical tools.

Section V.B. of the Fact Sheet has been modified to reflect this response by adding the following as the last sentence of the first paragraph in section V.B: “Groundwater data must be evaluated using appropriate statistical tools to determine when groundwater degradation is occurring.”

**Comment 3:** Reasonable potential for Total Trihalomethanes (TTHMs) was determined by summing the maximum effluent concentrations (MEC) of bromoform, chlorodibromomethane (CDBM), dichlorobromomethane (DCBM), and chloroform measured in samples collected on different days during the permit term. As a result, the resulting MEC for TTHMs (80.5 µg/L, Table F-6) is a manufactured value and is not representative of actual effluent discharge conditions. The MEC should be calculated using results measured in samples collected on the same day to evaluate the risk of causing or contributing to exceedances of the water quality objective. When the TTHM concentration is calculated this way, the maximum value during the previous permit term was 77.08 µg/L (measured in a sample collected on 3/18/15) which is less than the water quality objective of 80 µg/L. The City requests modification to the Tentative Order to remove the finding of reasonable potential and to remove the effluent limit for TTHMs (Table 4, page 6), and to eliminate monthly monitoring for chloroform and bromoform (Table E-4, page E-6).

**Response 3:** Regional Water Board staff agree that the MEC for TTHMs should have been calculated from CDBM, DCBM, chloroform, and bromoform results collected on the same day and not the individual maximum individual parameter concentrations. The reasonable potential analysis for TTHMs was reevaluated and Regional Water Board staff determined that there is no reasonable potential for TTHMs based on sample results during the term of

the 2012 Permit. Regional Water Board staff believe it is appropriate to retain monitoring requirements for chloroform and bromoform given the fact that the MEC of 77.08 µg/L is very close to the TTHM water quality objective of 80 µg/L.

The following changes were made to the Proposed Permit in response to this comment:

Order section IV.A.1.a, Table 4 has been modified to remove the effluent limitation for TTHMs.

Fact Sheet section IV.C.3.c, Table F-5 has been modified to change the MEC from 80.5 to 77.08 µg/L and to reflect no reasonable potential based on the date when the maximum TTHM concentration was observed. In addition, Table Note 6 has been modified to read: “Represents the ~~sum of the~~ maximum observed TTHM concentrations calculated by summing the results for bromoform, chlorodibromomethane, chloroform, and dichlorobromomethane collected on the same date (March 18, 2015).”

Fact Sheet section IV.C.3.c (first sentence) has been modified to read: “The RPA demonstrated reasonable potential for discharges of copper, cyanide, dichlorobromomethane, and chlorodibromomethane, ~~and total trihalomethanes~~ from the Facility to cause or contribute to exceedances of applicable water quality criteria.”

Fact Sheet section IV.C.3.c, Table F-5 has been modified to reflect the MEC of 77.08 µg/L and no reasonable potential for TTHMs. Footnote 6 of Table F-5 has been modified to read: “Represents the ~~sum of the~~ maximum observed TTHM concentrations calculated by summing the results for bromoform, chlorodibromomethane, chloroform, and dichlorobromomethane collected on the same date (March 18, 2015).”

Fact Sheet section IV.C.3.c, subsection titled “Total Trihalomethanes” has been removed as follows: “~~Total Trihalomethanes. Total trihalomethanes include bromoform, chlorodibromomethane, chloroform, and dichlorobromomethane. The CTR does not establish water quality objectives for total trihalomethanes. For waters designated as domestic or municipal supply, the Basin Plan (Chapter 3) adopts the MCLs, established by DDW for the protection of public water supplies in title 22 of the CCR, sections 64431 (Inorganic Chemicals) and 64444 (Organic Chemicals), as applicable water quality criteria. The MCL for total trihalomethanes (80 µg/L) is therefore applicable as a water quality criterion. The Permittee sampled the effluent for total trihalomethanes 35 times during the term of Order No. R1-2012-0068. The sum of the individual maximum observed concentrations for each parameter was 80.5 µg/L, as shown in the following table.~~

**Table F-6. Maximum Effluent Trihalomethane Concentrations**

<b>Parameter</b>	<b>Maximum Effluent Concentration (µg/L)</b>
Bromoform	ND
Chlorodibromomethane	4.3
Chloroform	66.3

Parameter	Maximum Effluent Concentration (µg/L)
Dichlorobromomethane	9.9
Sum of Trihalomethanes	80.5

No receiving water samples were collected for trihalomethanes. A determination of reasonable potential as been made based on the MEC of 80.5 µg/L exceeding the most stringent water quality objective of 80 µg/L. Therefore, this Order establishes effluent limitations for total trihalomethanes based on the Primary MCL.”

Fact Sheet section IV.C.4, Step 4 and Table F-8 (formerly Table F-9) have been modified to remove TTHMs from the discussion as follows:

**Step 4:** When the most stringent water quality criterion/objective is a human health criterion/objective (as for chlorodibromomethane, dichlorobromomethane, total trihalomethanes, and nitrate), the AMEL is set equal to the ECA. From Table 2 of the SIP, when CV = 0.60 and n = 4, the MDEL multiplier at the 99<sup>th</sup> percentile occurrence probability equals 3.11, and the AMEL multiplier at the 95<sup>th</sup> percentile occurrence probability equals 1.55 (for chlorodibromomethane). From Table 2 of the SIP, when CV = 1.8 and n = 4, the MDEL multiplier at the 99<sup>th</sup> percentile occurrence probability equals 7.87, and the AMEL multiplier at the 95<sup>th</sup> percentile occurrence probability equals 2.62 (for dichlorobromomethane). From Table 2 of the SIP, when CV = 1.6 and n = 4, the MDEL multiplier at the 99<sup>th</sup> percentile occurrence probability equals 7.26, and the AMEL multiplier at the 95<sup>th</sup> percentile occurrence probability equals 2.48 (for total trihalomethanes). From Table 2 of the SIP, when CV = 0.48 and n = 4, the MDEL multiplier at the 99<sup>th</sup> percentile occurrence probability equals 2.61, and the AMEL multiplier at the 95<sup>th</sup> percentile occurrence probability equals 1.44 (for nitrate). The MDEL for protection of human health is calculated by multiplying the ECA by the ratio of the MDEL multiplier to the AMEL multiplier. Final WQBELs for chlorodibromomethane, dichlorobromomethane, total trihalomethanes and nitrate are determined as follows.

**Table F-1.Determination of Final WQBELs Based on Human Health Criteria**

Pollutant	ECA (µg/L)	MDEL/AMEL	MDEL (µg/L)	AMEL (µg/L)
Chlorodibromomethane	0.40	2.0	0.80	0.40
Dichlorobromomethane	0.56	3.0	1.7	0.56
Total Trihalomethanes <sup>1</sup>	80	2.9	230	80
Nitrate Nitrogen, Total (as N) <sup>1</sup>	10	1.8	18	10
<u>Table Notes:</u>				
1. This Order establishes an AMEL only for Total Trihalomethanes and nitrate because the drinking water MCL for these pollutants is based on a long term average.				

Fact Sheet section IV.D.3 (5<sup>th</sup> sentence) modified to read: “In addition, this Order contains effluent limitations for ammonia, nitrate, pH, chlorine residual, copper, cyanide, dichlorobromomethane, and chlorodibromomethane, and total trihalomethanes that are

more stringent than the minimum, federal technology-based requirements but are necessary to meet water quality standards.”

Fact Sheet section VII.B.2.c has been modified to read: “Monitoring data collected over the term of Order No. R1-2012-0068 indicates that the discharge ~~exhibits reasonable potential to cause or contribute to an exceedance of at times~~ contains water quality criteria for total trihalomethane concentrations (sum of chloroform, bromoform, DCBM, and CDBM) that are very close to the water quality objective for TTHMs. Therefore, this Order requires the Permittee to calculate and report the effluent concentration of total trihalomethanes at Monitoring Location EFF-001B to determine ~~compliance with applicable effluent limitations if there is reasonable potential for TTHMs during the term of this Order.~~”

Fact Sheet section VII.B.2.i has been modified to read: “This Order eliminates the effluent monitoring requirement for title 22 pollutants due to the fact that monitoring during the term of Order No. R1-2012-0068 demonstrated that no title 22 pollutants, ~~total trihalomethanes and~~ except nitrate, exhibited reasonable potential to exceed applicable water quality objectives and effluent limitations and monitoring requirements are established for ~~these two~~ this pollutants in the Order.”

Attachment F-1 modified to change the MEC for TTHMs from 80.5 to 77.08 ug/L and to reflect no reasonable potential.

**Comment 4:** The water quality objective for chlorodibromomethane is mistakenly shown as 0.401 µg/L in the Tentative Order. The corrected value of 0.41 µg/L from the Federal Register should be reflected in Fact Sheet section IV.C.3.c (page F-31) of the Tentative Order.

**Response 4:** Regional Water Board staff agree with this comment. Fact Sheet section IV.C.3.c and Attachment F-1 have been modified to reflect the correct water quality objective of 0.41 µg/L for chlorodibromomethane.

**Comment 5:** The City requests permit reopener provisions to allow a possible alternative approach for meeting Salt and Nutrient Management Plan requirements (after adoption of the proposed Recycled Water Policy Amendment) and to conduct a mixing zone study to receive dilution credits or identify alternate downstream monitoring locations.

**Response 5:** Regional Board staff agree with this request and have modified the Proposed Permit to include the following reopener provisions in Order section VI.C.1:

Modify last sentence of subsection VI.C.1.g to read: “This Order may be reopened to incorporate provisions consistent with any SNMP(s) adopted by the Regional Water Board or subsequent amendments to the Recycled Water Policy.”

Add new subsection VI.C.1.i to read: **Mixing Zone Study.** This Order may be reopened for modifications to effluent limitations or receiving water monitoring locations if the Permittee demonstrates to the satisfaction of the Regional Water Board Executive Officer that it has evaluated all reasonable alternatives for compliance with human health-based effluent limitations for chlorine disinfection by-products and conducts a mixing zone study that provides a basis for determining that permit conditions should be modified.

Fact Sheet section VI.B.1.g has been modified to read: **Salt and Nutrient Management Plans (Special Provision VI.C.1.g).** This provision allows the Regional Water Board to reopen this Order ~~it adopts~~ if needed to incorporate provisions consistent with any regional or sub-regional salt and nutrient management plan(s) adopted by the Regional Water Board or any amendments to the Recycled Water Policy that are applicable to the Permittee.

Fact Sheet section VI.B.1.i has been added to correspond to the new reopener in Order section VI.C.1.i to read: **Mixing Zone Study.** This provision allows the Regional Water Board to reopen this Order if the Permittee demonstrates to the satisfaction of the Regional Water Board Executive Officer that it has evaluated all reasonable alternatives for compliance with human health-based effluent limitations for chlorine disinfection by-products and conducts a mixing zone study that provides a basis for determining that permit conditions (i.e., effluent limitations and/or receiving water monitoring locations) should be considered for modification.

**Comment 6:** The City request approval to collaborate with other POTWs to determine the presence of freshwater mussels or to establish site-specific ammonia criteria in the receiving water. The collaborative studies would be conducted with other dischargers in the Russian River Watershed or in conjunction with California dischargers that identify the same mussel species in their receiving waters.

**Response 6:** Regional Water Board staff agree with this request and have modified Order section VI.C.2 of the Proposed Permit to read: **Ammonia Study.** The Permittee shall conduct a study on its own or in collaboration with other dischargers to determine the presence of freshwater mussels in the receiving water or to calculate site-specific criteria to support implementation of the water quality criteria for ammonia in the April 2013 *Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater 2013 (EPA-822-R-13-001).*

Fact Sheet section VI.B.2.a (6<sup>th</sup> sentence) has been modified to read: “This Order requires the Permittee to conduct a study to determine the presence of mussels in the receiving water and allows the Permittee to conduct the study on its own or in collaboration with other dischargers.”

**Comment 7:** The new requirement to conduct water quality monitoring of groundwater seeps may be difficult to implement when seep flowrates are low or there is no flow. Contingency options should be provided in the permit to guide City and Regional Water Board decisions on whether or not a sample can be collected and which analyses will be conducted.

**Response 7:** Regional Water Board staff agree with this request and have added a new Footnote 1 to Monitoring and Reporting Program section IX.D.2, Table E-10 (Table E-11 of draft Permit), Footnote the Proposed Permit to read: “If the seep flow is lower than practicable for sample collection, only bottles that can be filled within one hour will be filled and analyzed. If the full volume for all analyses cannot be collected, analyte priorities will be discussed with Regional Water Board staff prior to analysis. A description of the sampling event, flow limitations, and selected analytes will be described in the quarterly self-monitoring report.”

## Staff Initiated Changes

### 1. Receiving Water Limitations

After the public comment period closed, Regional Water Board staff determined that the receiving water limitation language in the Draft Permit did not reflect the current Basin Plan. The Basin Plan was updated in May 2017 to include a new surface water receiving water limitation for dissolved oxygen and a new groundwater receiving water limitation for toxicity. The Proposed Permit has been revised to reflect these new Basin Plan requirements as follows:

- a. ***Dissolved Oxygen.*** Order Section V.A.1 has been modified to replace the old Basin Plan dissolved oxygen receiving water limitation with the new Basin Plan dissolved oxygen receiving water limitation as follows:

“The discharge shall not cause the dissolved oxygen concentration of the receiving water to be depressed below 9.0 mg/L.

In those waterbodies for which the aquatic life-based DO requirements are unachievable due to natural conditions<sup>1</sup>, site-specific background DO requirements can be applied<sup>2</sup> as water quality objectives by calculating the daily minimum DO necessary to maintain 85% DO saturation during the dry season and 90% DO saturation during the wet season under site salinity, site

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<sup>1</sup> Natural conditions are conditions or circumstances affecting the physical, chemical, or biological integrity of water that are not influenced by past or present anthropogenic activities.

<sup>2</sup> Upon approval from the Regional Water Board Executive Officer

atmospheric pressure, and natural receiving water temperature<sup>3</sup>. In no event may controllable factors reduce the daily minimum DO below 6.0 mg/L.

For the protection of estuarine habitat (EST), the dissolved oxygen concentration of enclosed bays and estuaries shall not be depressed to levels adversely affecting beneficial uses as a result of controllable water quality factors.”

~~The discharge shall not cause the dissolved oxygen concentration of the receiving water to be depressed below 7.0 mg/L. Additionally, the discharge shall not cause the dissolved oxygen content of the receiving water to fall below 10.0 mg/L more than 50 percent of the time, or below 7.5 mg/L more than 10 percent of the time in a calendar year. In the event that the receiving waters are determined to have a dissolved oxygen concentration of less than 7.0 mg/L, the discharge shall not depress the dissolved oxygen concentration below the existing level.~~

In addition, Fact Sheet section V.A. has been modified to add the following language to explain the reason for the change in the dissolved oxygen receiving water limitation: “The dissolved oxygen limitation in this Order reflects the new Basin Plan dissolved oxygen limit that was adopted by the Regional Water Board on June 18, 2015, and effective beginning April 24, 2017, after receiving approval from U.S. EPA. The new Basin Plan dissolved oxygen limitation specifies limits for the WARM, COLD, and SPWN beneficial uses. The COLD and SPWN beneficial uses occur in the Salt River and its tributaries. This Order includes only the SPWN limitations because it is the most restrictive and protective limit and the SPWN beneficial use is present throughout the entire discharge season.”

- b. *Chemical Constituents, Pesticides and Radioactivity.*** The following modifications were made so that permit language is consistent with the Basin Plan amendment language regarding chemical constituents, pesticides, and radioactivity.

Order section V.A.15 has been modified to remove the reference to article 4 as there are no pesticides listed in article 4, and to read: “The discharge shall not cause receiving waters to contain concentrations of pesticides in excess of Maximum Contaminant Levels (MCLs) established for these pollutants in title 22, division 4, chapter 15, ~~articles 4 and 5.5~~ of the CCR. “

Order section V.A.18 has been modified to specify all of the title 22 sections with numeric limits for chemical constituents, and reads: “The discharge shall

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<sup>3</sup> The method(s) used to estimate natural temperatures for a given waterbody or stream length must be approved by the Executive Officer and may include, as appropriate, comparison with reference streams, simple calculation, or computer models.



not cause concentrations of chemical constituents to occur in excess of MCLs and secondary MCLs (SMCLs) established for these pollutants in title 22, division 4, chapter 15, articles 4, section 64431, article 5.5, section 64444, and article 16, section 64449 of the CCR.”

Order section V.A.19 has been modified to specify the title 22 sections with numeric limits for radioactivity, and reads: “The discharge shall not cause receiving waters to contain radionuclides in concentrations which are deleterious to human, plant, animal or aquatic life, nor which result in the accumulation of radionuclides in the food web to an extent which presents a hazard to human, plant, animal or indigenous aquatic life, nor in excess of the MCLs and SMCLs established for these pollutants in title 22, division 4, chapter 15, article 5, sections 64442 and 64443 of the CCR.”

Order section V.B.2 has been modified to include correct references to title 22 sections with numeric limits and reads: “The collection, treatment, storage, and disposal of wastewater or use of recycled water shall not cause alterations of groundwater that contain chemical concentrations in excess of the MCLs and SMCLs specified established for these pollutants in title 22, division 4, chapter 15, article 4, sections 64435 (Tables 2 and 3) 64431, and article 5.5, section 64444, and article 16 section 64449 and the Basin Plan.”

Order section V.B.3 has been modified to make corrections to the title 22 sections related to radioactivity and reads: “The collection, treatment, storage, and disposal of wastewater or use of recycled water shall not cause groundwater to contain radionuclides in concentrations that cause nuisance or adversely affect beneficial uses, nor in excess of the MCLs and SMCLs limits specified established for these pollutants in title 22, division 4, chapter 15, article 5, sections 64442 and 64443 of the CCR.

Fact Sheet section V.B has been revised to remove the enumerated statements and to replace them with a narrative discussion regarding the basis for groundwater limitations to read: “Groundwater limitations in this Order have been retained from the previous Order with minor modification to reflect revised sections of title 22. Groundwater limitations are included in the Order to protect the beneficial uses of the underlying groundwater. The beneficial uses of the underlying groundwater are municipal and domestic supply, industrial service supply, industrial process supply, agricultural supply, and freshwater replenishment to surface waters. Discharges from the Facility shall not cause exceedance of applicable water quality objectives or create adverse impacts to beneficial uses of groundwater. Groundwater data must be evaluated using appropriate statistical tools to determine when groundwater degradation is occurring.”

- c. **Groundwater Toxicity.** The following modifications were made to add the new language to reflect the Basin Plan amendment groundwater toxicity objective. Order Section V.B.5 has been added to include the new groundwater toxicity objective, as follows: “Groundwaters shall not contain toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in humans, or that adversely affects beneficial uses. This limitation applies regardless of whether the toxicity is caused by a single substance or the synergistic effect of multiple substances.”

Fact Sheet section V.B has been modified to include the following statement: “The Order includes a new groundwater toxicity limitation that was adopted by the Regional Water Board on June 18, 2015, and effective beginning July 18, 2016 after receiving approval from the California Office of Administrative Law. This new Basin Plan limit requires that groundwaters shall not contain toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in humans, or that adversely affects beneficial uses. This limitation applies regardless of whether the toxicity is caused by a single substance or the synergistic effect of multiple substances.”

2. **Water Recycling Language.** Since the Permittee is still working on the Notice of Intent to enroll its water recycling program under State Water Board Order No. R1-2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order), the following sections of the Proposed Permit were revised to reflect this current status.

Order section IV.C.2.a has been modified to read: “This Order includes water recycling requirements that apply to the production of recycled water. The Permittee submitted an incomplete Notice of Intent (NOI) in January 2018 to obtain coverage under State Water Board Order No. WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order). The Permittee shall submit a complete NOI and obtain coverage under the Recycled Water General Order prior to initiating recycled water use.”

Fact Sheet section III.E.5 has been modified to read: “On January 4, 2018, the Permittee submitted an incomplete NOI to enroll under the Recycled Water General Order for the use of recycled water. ~~The Regional Water Board Executive Officer issued a Notice of Applicability of Enrollment under the Recycled Water General Order on [DATE].~~ The Permittee shall submit a complete NOI and obtain coverage under the Recycled Water General Order prior to initiating recycled water use.”

3. **Chronic Toxicity Language.** During the public comment period, Regional Water Board staff realized that this section of the Order did not include the most current standard language related to chronic toxicity. The following proposed changes were made to the Proposed Permit:

Order Section VII.J has been modified to include the most current language to read: “Compliance with the accelerated monitoring and TRE provisions shall constitute compliance with the chronic toxicity requirements, as specified in the MRP (Attachment E, sections V.B.8 and V.C). The narrative chronic toxicity limitation is exceeded when a chronic toxicity test, analyzed using the TST approach, results in “Fail” and the “Percent Effect” is  $\geq 0.50$ . The relative “Percent (%) Effect” at the discharge Instream Waste Concentration (IWC) is defined and reported as:  $((\text{Mean control response} - \text{Mean discharge IWC response}) \div \text{Mean control response}) \times 100$ . The chronic toxicity IWC for a chronic toxicity test is 100 percent effluent<sup>4</sup>. In addition, compliance with the accelerated monitoring and TRE provisions identified in the MRP (Attachment E, sections V.B. and V.C.) is further required.”

Fact Sheet Section IV.C.5.b (6<sup>th</sup> paragraph) has been modified to read: “To ensure compliance with ~~the narrative effluent limitation and~~ the Basin Plan’s narrative toxicity objective, the Permittee is required to conduct annual chronic WET testing at Discharge Point 001, as specified in the MRP (Attachment E, section V.B). Furthermore, the MRP (Attachment E, section V.C) requires the Permittee to investigate the causes of, and identify and implement corrective actions to reduce or eliminate effluent toxicity. If the discharge demonstrates toxicity ~~exceeding the numeric toxicity monitoring trigger~~ with a result of “Fail” in 100 percent effluent, the Permittee is required to initiate a TRE in accordance with an approved TRE Work Plan. The ~~numeric toxicity monitoring~~ “Pass/Fail” trigger is not an effluent limitation; it is the toxicity threshold at which the Permittee is required to perform accelerated chronic toxicity monitoring, as well as the threshold to initiate a TRE if a pattern of effluent toxicity has been demonstrated.”

- 4. Fact Sheet Facility Description.** During the public comment period, Regional Water Board staff identified a couple of corrections to be made to the Facility Description.

Fact Sheet section II.A.2 has been modified to read: “The Facility is designed to treat an average dry weather flow of 3.01 mgd and a peak wet weather flow of 24.5 mgd of secondary treated wastewater, as well as a peak wet weather flow of 7.0 mgd of advanced treated wastewater. The Facility’s treatment train consists of an influent wet well, bar screens, aerated grit removal, primary clarifiers, trickling filters, aerated solids contact tank, secondary clarifiers, and a chlorine contactor pipe where secondary disinfection is performed using sodium hypochlorite. ~~During the period from May 15 through September 30, the Facility produces disinfected secondary effluent for~~ This disinfected secondary effluent is discharged to three

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<sup>3</sup>——— The chronic toxicity test shall be conducted using a series of five dilutions and a control. The series shall consist of the following dilutions: 12/5, 25, 50, 75, and 100 percent. Compliance determination will be based on the IWC (100 percent effluent) and a control as further described in section IV.C.5.c of the Fact Sheet (Attachment F).

percolation ponds year-round. During the period from October 1 through May 14, treatment continues with the addition of a ferric chloride polymer as the wastewater is sent to multi-media filters, a tertiary chlorine contact basin where disinfection is performed using sodium hypochlorite, and a dechlorination facility where dechlorination is performed using sodium ~~bisulfate~~ bisulfite. The resulting disinfected, dechlorinated advanced treated wastewater effluent is discharged to the Russian River.”

5. **Influent Title 22 Pollutant Monitoring.** Special Provision VI.C.5.b.iii (Source Control and Pretreatment Provisions) requires the Permittee to monitor its influent one time during the permit term for priority pollutants, which is defined as CTR priority pollutants and title 22 pollutants. The following sections of the Proposed Permit were modified to be consistent with this Order section.

MRP section III.A.1, Table E-2 has been modified to read:

**Table E-2. Influent Monitoring – Monitoring Location INF-001**

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method <sup>1</sup>
CTR <del>Priority</del> and <u>Title 22</u> Pollutants <sup>3</sup>	µg/L	24-hr Composite <sup>4</sup>	Once per permit term <sup>5</sup>	Standard Methods
<b>Table Notes:</b>				
3. Those pollutants identified by the California Toxics Rule at 40 C.F.R. section 131.38 <u>and for which DDW has established MCLs at title 22, division 4, chapter 15, sections 64431 (Inorganic Chemicals) and 64444 (Organic Chemicals) of the CCR. Duplicate analyses are not required for pollutants that are identified as CTR and title 22 pollutants.</u>				
4. CTR priority pollutant samples shall be collected using 24-hour composite sampling, except for pollutants that are volatile. Samples for volatile pollutants may be collected as a grab sample.				
5. CTR priority pollutant sampling shall be completed no later than <b>December 31, 2020</b> .				

Fact Sheet section VII.A.3 has been modified to read: “This Order retains influent monitoring for CTR priority pollutants and adds monitoring for title 22 pollutants once during the permit term to evaluate the contribution of ~~priority pollutants~~ industrial dischargers in the influent to the Facility.”