

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

**Draft Waste Discharge Requirements and Water Reclamation Requirements
Order No. R1-2019-0007
Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Plant**

**Regional Water Quality Control Board, North Coast Region
April 18, 2019**

Comment Letter Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements and Water Reclamation Requirements, Order No. R1-2019-0007 (Draft Order) for the Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Plant (Facility) was February 4, 2019. The Sonoma County Water Agency (Discharger) provided timely comments by submitting a formal comment letter and a separate email identifying comments characterized by the Discharger as non-substantive comments. No other comments were received during the public comment period.

In this document, each comment is summarized, followed by the Regional Water Board staff response that includes any text that is proposed for modification. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The terms “Draft Order” and “Tentative Order” refer to the draft that was sent out for public comment. The term “Proposed Order” refers to the version of the Order that has been modified in response to comments and is being considered for adoption by the North Coast Regional Water Quality Control Board (Regional Water Board).

Sonoma County Water Agency – February 4, 2019 Comment Letter

Comment 1.a: The Discharger requests that Table 2 reflect that secondary or tertiary treated municipal wastewater may be used for pasture irrigation at the Sonoma County Airport and that Discharge Locations that utilize recycled water be identified as such (Comment 2 of February 4, 2019 email).

Response 1.a: Table 2 has been modified as requested by the Discharger, and now reads as follows:

Table 2. Discharge Locations

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Discharge Location
001	Secondary Treated Municipal Wastewater	38°31'10.26"N	122 °48'3.9"W	Secondary Effluent Storage Pond
002	Tertiary Treated Municipal Wastewater	38°31'0.18"N	122 °48'10.77"W	Tertiary Effluent Recycled Water Storage Pond at WWTF
002	Tertiary Treated Municipal Wastewater	38°30'19.08"N	122 °51'3.07"W	Tertiary Effluent Recycled Water Storage Pond at Reservoir D
003 ¹	Secondary <u>or</u> Tertiary Treated Municipal Wastewater	38°30'21.06"N	122 °48'55.39"W	Pasture Irrigation (Sonoma County Airport)
004 ¹	Tertiary Treated Municipal Recycled Water	---	---	Agricultural Irrigation
005 ¹	Tertiary Treated Municipal Recycled Water	---	---	Transfers to Windsor and Santa Rosa reclamation systems
Table Note: 1. <u>Recycled water use at Discharge Points 003, 004, and 005 is addressed in the Discharger's enrollment under State Water Resources Control Board Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order).</u>				

Also note, the addition of Table Note 1 to Table 2. This is a staff initiated change that is necessary to identify that these Discharge Points exist and that they are regulated through the Discharger's enrollment under the Recycled Water General Order.

Comment 1.b: The Discharger requests that Finding II.B, Background and Facility Description be modified to reflect details about the use of recycled water at the Sonoma County Airport. The Discharger's comment letter states that typically, only tertiary recycled water is produced at the Facility, but if secondary recycled water is available, it is applied at the airport pasture areas.

Response 1.b: The third and fifth paragraphs of Finding II.B have been modified to accurately reflect the details about the use of recycled water at the Sonoma County Airport, as follows:

3rd Paragraph, 1st three sentences. “The Facility preferentially produces disinfected ~~secondary-23 and~~tertiary recycled water but has the capability to store and use disinfected secondary-23 recycled water. All recycled water that is produced is currently used for irrigation and frost control. ~~The~~If secondary treated recycled water is produced, it is used for pasture irrigation on restricted access land at the Sonoma County Airport. Tertiary treated recycled water is used for agricultural irrigation, landscape irrigation, and frost control. The production of recycled water is addressed in these WDRs. On June 1, 2018, the Discharger submitted a Notice of Intent (NOI) for enrollment of recycled water uses under State Water Resources Control Board Order WQ 2016-0068-DDW, *Water Reclamation Requirements for Recycled Water Use* (Recycled Water General Order).”

5th paragraph, 2nd and 3rd sentences. “The Discharger currently has signed agreements with twelve individual recycled water users and currently provides disinfected tertiary recycled water for irrigation ~~capacity of up to~~ 500 acres of vineyards, ~~200~~10 acres of pasture, 5 acres of grass, and 20 acres of nut trees. In addition, the Discharger periodically applies secondary or tertiary recycled water to 210 acres of grasslands at the Sonoma County Airport. The Discharger also maintains agreements with the City of Santa Rosa and the Town of Windsor to transfer tertiary recycled water to these two entities ~~as needed~~ when the Discharger needs assistance to maintain its water balance provided and the City or the Town ~~have~~has adequate storage and/or disposal capacity to assist.”

Comment 2: The Discharger requests (1) that the beneficial uses identified in Finding II.D be modified to accurately describe groundwater beneficial use designations in the current North Coast Water Quality Control Plan (Basin Plan), (2) that surface water beneficial use designations be removed because the Facility is operated to prevent discharges to surface water, and (3) that the finding identify which are existing and which are potential beneficial uses.

Response 2: Regional Water Board staff compared the groundwater beneficial uses identified in the Draft Order to the groundwater beneficial uses in the Basin Plan and agree that the groundwater beneficial uses in the Draft Order need to be modified to reflect those identified in the Basin Plan. Regional Water Board standard language for waste discharge and water reclamation requirements does not differentiate between existing and potential as the Basin Plan protection is afforded to both types of beneficial uses.

Identification of surface water beneficial uses in the Draft Order is a factual finding that is included as standard language in all Regional Water Board waste discharge requirements. Impacts to these beneficial uses would be evaluated in the event of an unauthorized discharge that reaches surface waters.

The second and third paragraphs of Finding II.D have been modified as follows:

“Thus, beneficial uses applicable to area groundwater within the Mark West Hydrologic Subarea of the Middle Russian River Hydrologic Area to be protected are as follows: municipal and domestic supply (MUN), agricultural water supply (AGR), industrial service supply (IND), industrial process supply (PRO), ~~groundwater recharge (GWR)~~, aquaculture (AQUA), and Native American culture (CUL)~~freshwater replenishment (FRSH)~~.

The beneficial uses applicable to surface waters in the Mark West Hydrologic Subarea of the Middle Russian River Hydrologic Area to be protected are as follows: municipal and domestic supply (MUN), agricultural water supply (AGR), industrial service supply (IND), industrial process supply (PRO), groundwater recharge (GWR), freshwater replenishment (FRSH), hydropower generation (POW), navigation (NAV), water contact recreation (REC-1), non-contact water recreation (REC-2), commercial and sport fishing (COMM), warm freshwater habitat (WARM), cold freshwater habitat (COLD), wildlife habitat (WILD), rare, threatened, or endangered species (RARE), migration of aquatic organisms (MIGR), spawning, reproduction, and/or early development (SPWN), shellfish harvesting (SHELL), and aquaculture (AQUA).

Comment 3: The Discharger requests Discharge Prohibition III.I reflect compliance determination based on a calendar month rather than a 30-day period to be consistent with Compliance Determination section IX.B of the draft Order.

Response 3: Regional Board staff agree to modify Discharge Prohibition III.I to read as follows:

“The average daily dry weather flow (ADWF) of waste through the Facility in excess of 0.9 mgd, as determined from the calendar month with the lowest consecutive 30-day average daily flow, is prohibited. Compliance with this prohibition shall be determined as defined in section IX.B of this Order.”

Comment 4: The Discharger requests removal of effluent limitations for settleable solids and associated monitoring requirements since the Draft Order includes effluent limitations and monitoring requirements for total suspended solids, a better indicator of effluent quality.

Response 4: Regional Water Board staff concur that total suspended solids is a better indicator of effluent quality and that the settleable solids test is not essential for a secondary or tertiary wastewater treatment facility. Settleable solids effluent limitations and monitoring requirements have been removed from Table 5 (Table 4 in the Draft Order) and Table D-3 of the proposed Order.

Comment 5: The Discharger requests removal of filter loading rate requirements from section IV.C.2 of the Draft Order and from sections II (Table D-1) and V.A.1 of the

monitoring and reporting program stating that Title 22 of the California Code of Regulations does not specify filter loading rates.

Response 5: State Water Board Division of Drinking Water (DDW) staff have requested that filter loading rates be included in permitting actions for water reclamation requirements. Regional Water Board staff consulted with DDW staff and learned that microfilters (the filtration technology utilized at the Facility) do not have surface loading criteria. Instead microfilters must meet performance criteria in Title 22, section 60301.320(b) and these criteria are already included in section IV.C.2 of the Proposed Order.

The following changes were made in the Proposed Order in response to this comment.

Section IV.C.2.a of the draft Order is removed as follows, "~~**Filtration Rate.** The rate of filtration through the tertiary filters, as measured at Monitoring Location INT-001, shall not exceed 5 gallons per minute per square foot of surface area or other filtration rate approved by DDW and authorized in writing by the Regional Water Board Executive Officer.~~"

Monitoring and Reporting Program (MRP) section V.A.1 is removed as follows:

~~**"Effluent Filter Monitoring (Monitoring Location INT-001A)**~~

- ~~a. **Monitoring.** The Discharger 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 specified in section IV.C.3.a of the Order. The rate of flow through the tertiary filters shall be measured at Monitoring Location INT-001A.~~
- ~~b. **Compliance.** Compliance with the maximum daily filter surface loading rate, as specified in section 60301.320 of the CCR Water Recycling Criteria (title 22), shall be calculated based on the flow rate through each filter unit.~~
- ~~c. **Reporting.** The maximum daily filter surface loading rate shall be reported on the monthly SMRs."~~

Table D-1 of the MRP has been modified to remove the monitoring location that was designated for monitoring of surface loading rate, INT-001A and to rename the monitoring location designated for monitoring filtration process turbidity as INT-001, as follows:

Table D-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
---	INF-001	Untreated influent wastewater collected at the Facility headworks at a representative point preceding primary treatment
---	INT-001A	Location for monitoring the flow and surface loading rate through the tertiary wastewater process filters.

Table D-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
---	INT-001 B	Location for monitoring filtration process turbidity.

MRP section V.A has been modified to reflect this change to Monitoring Location INT-001.

Comment 6: The Discharger requests that filter effluent monitoring requirements specified in Other Monitoring Requirements section V.A.2 of the MRP include language that takes into account occasional turbidity excursions that occur following cleaning procedures, such as air entrapment that cause false turbidity spikes following backwashes or clean-in-place procedures. Following these procedures, turbidity can exceed the limit of 0.5 NTU for up to 15 minutes, but are identified as false spikes by the sudden spike and decreasing trend. A true filter failure would result in an increasing turbidity trend.

The Discharger also identified minor typographical errors in this section.

Response 6: Regional Water Board staff consulted with DDW staff regarding the requested change and agree to add language that would not consider as a violation any exceedance that occurs for a duration of 15 minutes or less as a result of membrane cleaning procedures. We agreed to this change because the effluent turbidity limitations for this Facility are the more stringent Title 22 technology-based limitations applicable to microfiltration technology. Title 22 turbidity limitations for water recycling facilities that utilize media filtration (i.e., sand filters, cloth filters) are also technology-based but are an order of magnitude higher than the turbidity limitations that apply to microfiltration. Because the turbidity limitations applicable to this Facility are more stringent than what is required to ensure that tertiary disinfection requirements are met, Regional Water Board staff find that including language that minimizes the need for diverting compliant water due to a false negative turbidity spike will be protective of water quality and beneficial uses. The proposed language requires clear documentation that any recycled water not diverted is compliant with Title 22 requirements.

Monitoring and Reporting Program section V.A. of the Draft Order has been renumbered as section V.A.1. In addition, the requirements in section V.A.1.b and section V.A.1.c in the Proposed Order have been modified to read as follows:

“b. Compliance. Compliance with the 95th percentile effluent turbidity limitation specified in title 22, as referenced in section ~~IV.C.3.b~~IV.C.2.a.i of the Order, shall be determined using the levels of recorded turbidity taken at intervals of no more than 1.2 hours over a 24-hour period. Exceedances of the maximum turbidity requirement referenced in section ~~IV.C.3.b.ii~~IV.C.2.a.ii of this Order shall not be considered a violation of these waste discharge and water reclamation requirements if such exceedance does not

exceed a duration of one minute or if the exceedance occurs as a result of membrane cleaning procedures and does not exceed a duration of fifteen minutes."

"c. Reporting. If the filtered effluent turbidity exceeds 0.2 NTU for more than 5 percent of the time in a 24-hour period or 0.5 NTU at any time (based on the compliance period defined in section IV.C.2.a), the incident shall be reported in the ~~quarterly~~ monthly SMR and to the Regional Water Board and DDW by telephone within 24 hours in accordance with Provision VIII.N of this Order. A written report describing the incident and the actions undertaken in response shall be included in the monthly SMR. Mitigation of the event shall consist of diverting all inadequately treated wastewater to temporary storage or an upstream process or automatically activated chemical addition to comply with title 22 requirements (Sections 60304 and 60307). Any time the filtered effluent turbidity exceeds 0.5 NTU for more than fifteen minutes due to membrane cleaning procedures, the incident(s) shall be described in the applicable monthly SMR cover letter. At a minimum, each incident will be presented in table format and include the maximum turbidity, the duration of the exceedance, and the cause of the exceedance."

Comment 7: The Discharger requests modifications to language in General Provision VIII.F of the Proposed Order to reflect the method that the Discharger uses to track changes in the commercial and industrial user base that discharges to the Facility. The Discharger requests that in lieu of replicating an Industrial Waste Survey (IWS) every 5 years, that the Proposed Order require continuous updating of the comprehensive IWS that was conducted in 2017.

Response 7: Regional Water Board staff concur with this proposal and have modified General Provision III.F of the Proposed Order to read as follows in order to allow the Discharger to update its IWS on an annual basis:

"c. Industrial Waste Survey and Influent Priority Pollutant Monitoring Inventory

"The Discharger conducted a comprehensive survey of the commercial and industrial users in the service area in 2017. The Discharger continuously tracks changes in the commercial and industrial user base through County building permit reviews, drive-by inspections, and walk-in inspections. The Discharger shall provide an updated inventory of all identified industrial users in the service area by category (i.e., SIU, NCSIU, etc.) and permitting status in its annual report to the Regional Water Board. At a minimum, the inventory shall identify the following information for each industrial user: the user name, conduct an industrial waste survey (IWS) of all the industrial users (IUs) in the service area of the Facility at least once every five years to determine whether any IUs are subject to pretreatment standards specified in 40 C.F.R. Part 403. At a minimum, the IWS must identify the following for each industrial user and zero-discharging categorical industrial user: whether it qualifies as a significant user; the average flow rate; the SIC code; any pretreatment being implemented by each industrial user; and whether or not the Discharger has issued a permit to any of the

identified industrial users. ~~The IWS is required during the 12-month period that begins on January 1, 2020, and every five years thereafter (2025, 2030, etc.).~~"

Comment 8: The Discharger requests removal of the requirement to perform a once in 5 years priority pollutant scan of the Facility influent. The Discharger states that discharges from each industrial user to the collection system are monitored periodically (frequency dependent upon size of facility and nature of discharge) to determine the presence of pollutants of concern and that this is a better way to monitor than a once every five year influent scan.

Response 8: Regional Water Board staff concur with this request. Sections VIII.F.ii and iii of the Proposed Order has been modified to remove the IWS requirements as follows:

~~"ii. The Discharger shall also perform a priority pollutant scan of the influent to the Facility. This monitoring shall be conducted during the same 12-month period identified in i., above.
 iii. The results of the IWS and priority pollutant monitoring shall be submitted to the Regional Water Board in written reports to be submitted within two months of the end of the calendar years specified in Provision F.1.c.i, above. The first report shall be submitted no later than March 1, 2021, then every five years thereafter (March 1, 2026, March 1, 2031, etc.). The written report shall include a certification report indicating whether the Facility receives pollutants from any IU that would require the Discharger to establish a pretreatment program in accordance with 40 C.F.R. Part 403."~~

In addition, section VI.B.1 of the MRP has been modified to remove the references to the source control requirements that are being modified in response to Discharger Comments 7 and 8, as follows:

Table D-6. Reporting Requirements for non-SMR Reports Specified in the Order and MRP

Order Section	Special Provision Requirement	Reporting Requirements
Provision VIII.F.1	Source Control and Pretreatment Provisions, Annual Report	March 1, annually
Provision VIII.F.1.c.i	Source Control and Pretreatment Provisions, Industrial Waste Survey and Priority Pollutant Monitoring Results	Calendar years 2020, 2025, 2030, etc. (once every 5 years)
Provision VIII.F.1.c.iii	Source Control and Pretreatment Provisions, Industrial Waste Survey and Priority Pollutant Monitoring Results	March 1, 2021 and every 5 years thereafter (i.e., March 1, 2026, etc.)

Section VI.B.2.f of the MRP has been modified to require annual submittal of the updated industrial user inventor, as follows:

“Source Control Activity Reporting. The Discharger shall submit a description of the Discharger’s source control activities performed during the calendar year, as required by General Provision VII.F of the Order, including:

- a. A copy of any source control standards;
- a. A description of any waste hauler permit system;
- b. A summary of compliance and enforcement activities during the past year. The summary shall include the names and addresses of any industrial or commercial users under surveillance by the Discharger, an explanation of whether they were inspected, sampled, or both, the frequency of these activities at each user, and the conclusions or results from the inspection or sampling of each user.
- c. A summary of public outreach activities to educate industrial, commercial, and residential users about the importance of preventing discharges of industrial and toxic wastes to the Facility.
- d. An updated inventory of all of the industrial users in the service area.”

Comment 9: The Discharger requests removal of the general and specific pretreatment provisions from the Proposed Order as the Discharger includes these in the Sewer Use Ordinance for the Facility.

Response 9: Regional Water Board staff appreciate the fact that the Discharger includes the general and specific prohibitions in the Facility Sewer Use Ordinance. It is standard practice for the Regional Water Board to also include these prohibitions in permitting actions for publicly-owned treatment works (POTWs) with known industrial sources. Therefore, no changes were made to the Proposed Order in response to this comment.

Comment 10: The Discharger requests clarification of the meaning of “industrial wastes subject to regulation ...” in General Provision VII.F.2 (sic).

Response 10: Regional Water Board staff reviewed the federal pretreatment regulations and in consultation with U.S. EPA, the following modifications have been made to General Provision VIII.F.2 of the Proposed Order:

2. “In the event that the Discharger identifies industrial wastes from Significant Industrial Users (SIUs) as defined in 40 C.F.R. 403.3(v) subject to pretreatment standards under 40 C.F.R. 403 (National Pollutant Discharge Elimination System Pretreatment Program) being discharged to the wastewater treatment plant or the Regional Water Board or its Executive Officer determines that circumstances warrant pretreatment requirements in order to prevent interference [40 C.F.R. §403.3(jk)] with the wastewater treatment Facility or Pass Through [40 C.F.R. §403.3(np)], then:
 - a. The Discharger shall notify the Regional Water Board within 30 days after there are discharges that trigger the pretreatment requirements;

- b. The Discharger shall submit a revised Report of Waste Discharge and the pretreatment program for the Regional Water Board's review and approval as soon as possible, but not more than one year after the Discharger's notification to the Regional Water Board of the need for pretreatment requirements being triggered; and
- c. Industrial Users classified as Nonsignificant Industrial Users and Middle Tier Categorical Industrial Users as defined by the U.S. EPA 2006 Pretreatment Streamlining Rule shall be exempt from the notification and reporting requirements in Provisions VIII.F.2(a) and VIII.F.2(b)."

Comment 11: The Discharger requests an additional year to complete an update to its sewer use ordinance (SUO) that is required in General Provision VIII.F.4.b. The additional year is needed to provide adequate time for public comment and review of the updated SUO following the Discharger's review of its SUO.

Response 11: Regional Water Board staff concur with this request. The date by which the Discharger must complete its update of the SUO, if this is found to be necessary during its review of the existing SUO, has been changed to February 1, 2025. This modified date is reflected in Proposed Order section VIII.F.4 and MRP section VI.B.1, Table D-6.

Comment 12: The Discharger requests that MRP General Monitoring Provision I.A allow for composite samples to be either time-based or flow-based. The Draft Order language specified flow-based only, but, due to the batch nature of the influent into the Facility, the Discharger currently uses time-based sampling and states that changing to flow-based sampling would require installation of significant electrical and SCADA controls which are expensive and unnecessary for evaluating influent and effluent quality. The Discharger also requests that the requirement for Executive Officer approval of the proportional sampling device used, be removed, as this seems like an unnecessary approval.

Response 12: Regional Water Board staff concur that the Discharger's current time-based monitoring approach for this Facility is appropriate and that Executive Officer approval is not needed for the selection of a proportional sampling device. MRP section I.A of the Proposed Order has been modified to read as follow:

"Wastewater Monitoring Provision. Composite samples may be taken by either a time-based or flow-proportional sampling device approved by the Executive Officer or by grab samples composited ~~in proportion to flow at specific time intervals~~. In any time-based method or in compositing grab samples, the sampling interval shall not exceed 1 hour.

Comment 13: Since the monitoring requirements for recycled water use will be specified in an enrollment under State Water Resources Control Board Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (Recycled Water General Order),

inclusion of Monitoring Locations REC-001, REC-002, and REC-003 in Table D-1 of the WDRs does not appear to be necessary.

Response 13: The Discharger is correct that the recycled water monitoring locations are not necessary in the WDR, therefore, Table D-1 has been modified to remove the 3 recycled water monitoring locations, as follows:

Table D-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
003	REC-001	Secondary or tertiary treated recycled water discharged to the Sonoma County Airport pasture irrigation areas.
004	REC-002	Disinfected, tertiary recycled water distributed to the agricultural recycled water irrigation areas
005	REC-003	Disinfected, tertiary recycled water transferred to the Town of Windsor and City of Santa Rosa reclamation systems

Comment 14: The Discharger requests removal of influent monitoring requirements for priority pollutants because the Discharger monitors and inspects industrial and commercial facilities and their discharges through the Discharger’s Industrial Pretreatment Program.

Response 14: Regional Water Board staff concurs with this request to not require priority pollutant monitoring in the influent. Table D-2 has been modified to remove this requirement as follows:

Table D-2. Influent Monitoring – Monitoring Location INF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Influent Flow ¹	mgd	Meter	Continuous
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	24-hr Composite	Monthly
Total Suspended Solids	mg/L	24-hr Composite	Monthly
Settleable Solids	mL/L	Grab	Monthly
Priority Pollutants ²	µg/L	24-hr Composite ³	Once every five years ⁴
Table Notes:			
1. The Discharger shall report the daily average and monthly average flows.			

Parameter	Units	Sample Type	Minimum Sampling Frequency
2. Those pollutants for which DDW has established MCLs at title 22, division 4, chapter 15, sections 64431 (Inorganic Chemicals) and 6444 (Organic Chemicals) of the CCR. 3. 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. 4. Priority pollutant sampling shall be completed during calendar year 2020, and every five years thereafter.			

Comment 15: Monitoring of disinfection CT is only required for tertiary recycled water (EFF-002) and should not be included as a monitoring requirement for secondary recycled water (EFF-001). Since disinfection CT requirements are already described in Provision V.B of the Draft Order, the Discharger requests removal of these parameters from Table D-3 of the MRP.

Response 15: Regional Water Board staff concur with the request to not duplicate the disinfection CT requirements for EFF-002 in Table D-3 since the disinfection CT requirements are clearly described in MRP section V.B, Other Monitoring Requirements. Table D-3 has been modified as follows:

Table D-3. Effluent Monitoring – Monitoring Locations EFF-001 and EFF-002

Parameter	Units	Sample Type	Minimum Sampling Frequency
Effluent Flow ¹	mgd	Meter	Continuous
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	24-hour composite	Weekly
Total Suspended Solids	mg/L	24-hour composite	Weekly
Settleable Solids	mL/L	24-hour composite	Weekly
pH	Standard Units	Grab	Daily
Total Coliform Organisms	MPN/ 100 mL	Grab	Daily
Total Chlorine Residual ²	mg/L	Meter ³ ,	Continuous
Disinfection CT ⁴	Mg-min/L	Calculation	Daily
Table Notes: 1. Each month, the Discharger shall report the daily average and monthly average flows. 2. Chlorine residual monitoring at Monitoring Locations EFF-001 and EFF-002 shall demonstrate that chlorine residual is present after chlorination. This monitoring shall occur continuously when transferring from the chlorine contact tank to the secondary and tertiary effluent storage ponds. 3. Report minimum daily chlorine residual.			

Sonoma County Water Agency – February 4, 2019 email

Comment 1: The Discharger requests that the Proposed Order include the correct Facility address in Order Tables 1 and 3.

Response 1: Tables 1 and 3 (Table 3 in the Draft Order) of the Proposed Order has been changed to reflect the correct Facility address as 800 Aviation Boulevard.

Comment 2: The Discharger requests that discharge locations that utilize recycled water be identified as such, rather than as “effluent” in Table 2. In addition, the Discharger requests that Effluent Limitation IV.B.1 to add the words “recycled water.”

Response 2: See Response in Comment 1.a to the February 4, 2019 Comment Letter. In addition, Effluent Limitation IV.B.1 of the Proposed Order has been modified as follows:

“The Discharger shall maintain compliance with the following effluent limitations for disinfected tertiary recycled water prior to tertiary recycled water storage, with compliance measured at Monitoring Location EFF-002 as described in the Monitoring and Reporting Program.”

Comment 3: The Discharger identified an error in the draft WDR description of the size of the pasture irrigation area, which should be 10 acres.

Response 3: Finding II.B has been modified to reflect 10 acres of pasture rather than 200. It appears that staff incorrectly combined the acreage of grassland at the Sonoma County Airport with the acreage of the privately-owned 10 acre pasture. Finding II. B already reflects the acreage of the grasslands at the Sonoma County Airport as 210 acres.

Comment 4: Order Effluent Limitation IV.B.2.a includes a footnote number, but the footnote is missing.

Response 4: The Footnote language has been added to the Proposed Order, as follows: “See Section IX of this Order regarding compliance with the 7-day median bacteriological limitation.”

Comment 5: This comment identified minor typographical errors throughout the WDR

Response 5: The following modifications to the Proposed Order are made to address the minor typographical errors that the Discharger identified in Comment 5:

Page 2, last paragraph has been modified to reflect the adoption date as April 17 or 18, ~~2018-2019~~.

Discharge Prohibition III.K has been modified to remove the last words “~~identified in Provision VIII.B.2.b of this Order.~~” as this language was erroneously included in the Draft Order.

Effluent Limitation C.3.a has been modified to provide better clarification, as follows: “As measured ~~at~~following the end of the secondary chlorine contact basin at Monitoring Location EFF-001, the total residual chlorine concentration shall be maintained at a level that ensures the discharge meets the total coliform limitations at ~~the end of the disinfection process when discharging to the recycled water storage pond~~discharging to the secondary recycled water storage pond at Discharge Point 001.

Effluent Limitation C.3.b.i has been modified for consistency with Title 22, as follows: “The chlorine disinfection process shall at all times provide a CT value of not less than 450 milligram-minutes per liter (mg-min/L) with a modal contact time of at least 90 minutes, based on peak ~~daily~~dry weather design flow.”

Section VIII of the proposed Order has been modified to read, “General Provision”.

General Provision VIII.J has been modified to refer to “Attachment BD”.

General Provision L.5 has been modified to refer to the correct paragraphs as follows: “Any person signing a document or report under ~~paragraph (a) or (b)~~ paragraphs 1, 2, 3, and 4 of this provision shall make the following certification:”

Monitoring and Reporting Program (MRP) (Attachment D), section V.A.2, Other Monitoring Requirements, Effluent Filter Monitoring (Monitoring Location INT-001B) has been modified to change incorrect references to section IV.C.3 to properly reference section IV.C.2 of the proposed Order.

MRP section V.B, Other Monitoring Requirements, Disinfection Process Monitoring for Tertiary Chlorine Disinfection System, has been modified to change the incorrect reference to section IV.C.4.b to properly reference section IV.C.3.b of the proposed Order.

MRP sections V.A.2.c and V.B.1.c have been modified to change from “quarterly” to “monthly” for the SMR monitoring frequency.

MRP section V.B.1 has been modified to properly read as follows: “Disinfection Process Monitoring (Monitoring Location EFF-~~001~~002.”

MRP section VI.C.1, Footnote 1 has been modified to read as follows: “The contact number of the Regional Water Board during normal business hours is (707) 576-2220. After normal business hours, spill reporting to CalEMA the California Governor’s Office of Emergency Services Warning Center (CalOES) will satisfy the 24-hour spill reporting requirement for

the Regional Water Board. The contact number for spill reporting for the ~~CalEMA~~ CalOES is (800) 852-7550.”

Staff Initiated Changes

1. The Order title has been changed from: “Waste Discharge/Reclamation Requirements” to “Waste Discharge Requirements and Water Reclamation Requirements”. This modification doesn’t change the nature of the Order.
2. A new table, Table 3, Administrative Information has been added that identifies the adoption and effective dates for this Order. Typically, WDRs are effective on the adoption date. However, this Order is being coordinated with the need to enroll the Discharger’s recycled water program under State Water Resources Control Board Order WQ 2016-0068-DDW, Water Reclamation Requirements for Recycled Water Use (General Order). A crucial step in completing the enrollment under the General Order is the need for the Discharger to submit a complete Title 22 Recycled Water Engineering Report (Report) for approval by the State Water Board Division of Drinking Water (DDW). The Discharger has been working with Regional Water Board and DDW staff to complete this Report. DDW staff have indicated that their most recent request for additional information from the Discharger should result in a complete Report and that a DDW acceptance letter would be prepared shortly after the complete Report is submitted. Regional Water Board staff anticipate that DDW will complete an acceptance letter prior to July 1, 2019. Therefore, Table 3 identifies the effective date of the Order as July 1, 2019.

Finding II.J of the Proposed Order has been revised to reflect the fact that DDW approval of the title 22 recycled water engineering report is pending. Finding II.J has been modified as follows:

“Recycled Water. This Order includes water recycling requirements that apply to the production and storage of secondary and tertiary recycled water, while the Discharger’s distribution and use of recycled water are permitted through the Discharger’s enrollment under the Recycled Water General Order. The Discharger submitted a NOI on June 1, 2018 to obtain coverage under the Recycled Water General Order. The NOI included a title 22 Recycled Water Engineering Report (title 22 report) that was reviewed by State Water Board Division of Drinking Water (DDW) staff. ~~DDW issued a comment letter dated June 29, 2018 requiring revisions to the title 22 report. DDW issued an acceptance letter for the title 22 report on [DATE].~~ The revised NOI and title 22 report were submitted to the Regional Water Board and DDW on February 25, 2019. The Regional Water Board Executive Officer will issue a Notice of Applicability of Enrollment under the Recycled Water General Order upon receipt of DDW’s approval of the title 22 report and prior to the effective date of this Order.”

The addition of this new table, Table 3, resulted in the need to change the table numbers for all subsequent tables in the Draft Order.

3. Tables 1 and 4 (Table 3 in the Draft Order) have been modified to properly reflect the Discharger and the Facility. The Sonoma County Water Agency is the owner and operator of the Facility therefore it is unnecessary to include Airport-Larkfield Wikiup Sanitation Zone as the Discharger. The following modification was made to Tables 1 and 3 of the Proposed Order

Discharger	Airport-Larkfield-Wikiup Sanitation Zone and Sonoma County Water Agency
Name of Facility	Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Facility
Facility Address	800Aviation Boulevard
	Santa Rosa, CA 95403

4. Effluent Limitation IV.B.1, Table 6 (Table 5 in the Draft Order) has been modified to add a missing Table Note. The Table Note was inadvertently included in the Draft Order as a footnote rather than a table note. The Proposed Order has been modified to delete Footnote 3 and add it as Table Note 2 in Table 6, as follows:

Table 6. Effluent Limitations –Discharge to Tertiary Recycled Water Storage Ponds

Parameter	Units	Effluent Limitations ¹			
		Average Monthly ^{2,3}	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Biochemical Oxygen Demand (5-day @ 20°C)	mg/L	10	20	--	--
Total Suspended Solids	mg/L	10	20	--	--
pH	std units	--	--	6.0	9.0
<u>Table Notes:</u>					
1. See Definitions in Order Section IX. Compliance Determination.					
2. See Section IX of this Order regarding compliance with the Average Monthly Effluent Limitation.					

5. A new requirement for the Discharger to develop a Disaster Preparedness Report and Action Plan has been added to the Proposed Order as General Provision VIII.G. This new requirement is necessary in order to ensure that (1) Facility operations are not disrupted due to events such as natural disasters, extreme weather events, shifting precipitation patterns, and power outages, (2) compliance with conditions of the Proposed Order are achieved, and (3) receiving waters are not adversely impacted by permitted and unpermitted discharges. The new proposed language is as follows:

“Disaster Preparedness Assessment Report and Action Plan. Natural disasters, extreme weather events, sea level rise, and shifting precipitation patterns, some of which are projected to intensify due to climate change, have significant implications for wastewater treatment and operations. Some natural disasters are expected to become more frequent and extreme according to the current science on climate change. In order to ensure that Facility operations are not disrupted, compliance with conditions of this Order are achieved, and receiving waters are not adversely impacted by permitted and unpermitted discharges, the Permittee shall submit a Disaster Preparedness Assessment Report and Action Plan to the Regional Water Board by **June 1, 2022**, for Executive Officer review and approval.

The Permittee shall: (1) conduct an assessment of the wastewater treatment facility, operations, collection, and discharge systems to determine areas of short- and long-term vulnerabilities related to natural disasters and extreme weather, including sea level rise and other conditions projected by climate change science, if applicable; the assessment shall consider, as applicable, impacts to plant operations due to changing influent and receiving water quality, rising sea level, storm surges, fires, floods, earthquakes, tsunamis, back-to-back severe storms, and other extreme conditions that pose a risk to plant operations and water quality; (2) identify control measures needed to protect, improve, and maintain wastewater infrastructure,

waste discharge compliance, and receiving water quality in the event of a natural disaster or, if applicable, under conditions resulting from climate change; (3) develop a schedule to implement necessary control measures. Control measures shall include, but are not limited to, emergency procedures, contingency plans, alarm/notification systems, training, backup power and equipment, and the need for planned mitigations to ameliorate potential risks associated with extreme weather events and changing conditions resulting from climate change; and (4) implement the necessary control measures per the approved schedule of implementation.”

6. A new Finding II.O has been added describing how the WDR adoption action can be petitioned and reads as follows:

“Petition of Action. Any person aggrieved by this action of the Regional Water Board may petition the State Water Board to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Order, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.”

7. The MRP section has been modified to add several missing General Monitoring Provisions, that are standard monitoring provisions in all MRPs for wastewater:

F. Sample Documentation. All samples shall be representative of the volume and nature of the discharge or matrix of material sampled. The name of the sampler, sample type (grab or composite), time, date, location, bottle type, and any preservative used for each sample shall be recorded on the sample chain of custody form. The chain of custody form must also contain all custody information including date, time, and to whom samples were relinquished. If composite samples are collected, the basis for sampling (time or flow weighted) shall be approved by Regional Water Board staff.

G. Field test Instruments. Field test instruments (such as those used to test pH, dissolved oxygen, and electrical conductivity) may be used provided that they are used by a California Environmental Laboratory Program (ELAP) certified laboratory or:

1. The user is trained in proper use and maintenance of the instruments;
2. The instruments are field calibrated prior to monitoring events at the frequency recommended by the manufacturer;
3. Instruments are serviced by the manufacturer or authorized representative at the recommended frequency; and

4. Field calibration reports are maintained and available for at least three years.

H. Duplicative Monitoring Requirements. If monitoring requirements listed below duplicate existing monitoring requirements under other orders including WDRs or waivers of WDRs, then duplication of sampling and monitoring activities are not required if the monitoring activity satisfies the requirements of this MRP. In addition to submitting the results under another order, the results shall be submitted in the reports required by the General Order and this MRP.

I. Approved Test Methods. All monitoring must be conducted using approved test methods or other test methods specified in this MRP.

J. Sampling Method. Collecting composite samples is acceptable in most cases. Due to short holding times, bacteriological samples collected to verify disinfection effectiveness must be grab samples.