



April 24, 2019

Matthias St. John
Executive Officer
Regional Water Quality Control Board
North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, California 95403
By email: northcoast@waterboards.ca.gov

Subject: Comments on Tentative Order No. R1-2019-0013 for the Geyserville Sanitation Zone Wastewater Treatment Facility (WDID No. 1B771170SON)

Dear Mr. St. John:

The Sonoma County Water Agency (Sonoma Water) has reviewed the Tentative Order Waste Discharge Requirements (WDRs) issued by the North Coast Regional Water Quality Control Board (Regional Water Board) on March 26, 2019. The following comments are submitted prior to the April 25, 2019 deadline to be considered for inclusion in the final adopted WDRs for the Geyserville Sanitation Zone Wastewater Treatment Facility (GSZ WWTF). Many of the comments are provided to ensure consistency with the permit issued recently for the Airport-Larkfield-Wikiup Sanitation Zone WWTF (Order No. R1-2019-0007), another facility that is owned and operated by Sonoma Water. For requested revisions to the text of the Tentative Order, underline is shown for suggested additions, and ~~strike-out~~ is shown for suggested deletions.

- 1. The GSZ WWTF produces secondary treated effluent that is discharged to evaporation/ percolation ponds for disposal. For consistency with the permit recently adopted for Airport-Larkfield-Wikiup Sanitation Zone (ALWSZ), the discharge location should be identified in Table 2 of the WDRs rather than the receiving water. The following changes are requested to accurately describe effluent quality and discharge location.**

Table 2. Discharge Location [Permit, Page 1]

Discharge Point	Effluent Description	Discharge Point Latitude	Discharge Point Longitude	Receiving Water	<u>Discharge Location</u>
001	<u>Secondary Treated Municipal Wastewater</u>	N 38°42'11"	W 122°53'40"	Groundwater	<u>Evaporation/ Percolation Ponds</u>

- The Facility Contact for the GSZ WWTF is the individual currently assigned as the “Water Agency Coordinator” for the facility. Sonoma Water rotates this position between three individuals and the appropriate contact person can be reached using the dedicated 24-hr/day, 7-day/week phone number at the Operations Center. The following changes are recommended to make sure the designated person in charge of the GSZ WWTF can be reached under all conditions.

Table 3. Facility Information [Permit, Page 2]

Facility Contact, Title, and Phone	Garett Walker, Operations Coordinator 707-521-1849 Water Agency Coordinator, 707-523-1070
------------------------------------	--

- The design flow of the GSZ WWTF (0.092 mgd) is based on the average daily dry weather flowrate (ADWF) determined by averaging the daily effluent flowrate during calendar months with the lowest average daily flow. To ensure consistency between design conditions, discharge prohibition language, and the approach for compliance determination, Sonoma Water requests removal of the term “monthly” when used in reference to ADWF and use of the compliance approach that was incorporated into the ALWSZ WDRs.

Table 3. Facility Information [Permit, Page 2]

Facility Design Flow	0.092 million gallons per day (mgd) monthly Average Dry Weather Flow (ADWF);
----------------------	---

Discharge Prohibitions III.H. [Permit, Page 7]

The average ~~monthly~~ daily dry weather flow of waste through the Facility shall not exceed 0.092 mgd, as determined from the calendar month with the lowest average daily flow. Compliance with this prohibition shall be determined as defined in section IX.B of this order.

Compliance Determination IX.B. [Permit, Page 16]

B. ~~Monthly~~ Average Dry Weather Flow

Compliance with the ~~monthly~~ average dry weather flow prohibition in section III.H of this Order will be determined once each ~~month~~ calendar year by evaluating all flow data collected in the corresponding calendar ~~month~~ year. The flow through the Facility, measured daily and averaged monthly, must be 0.092 mgd or less ~~during dry weather conditions~~, for the month ~~in any calendar year~~ with the lowest average monthly flow. Compliance with this prohibition shall be measured continuously at Monitoring Location INF-001 and calculated daily.

- In the current North Coast Water Quality Control Plan (Basin Plan), freshwater replenishment (FRSH) is not identified as an existing or potential beneficial use for groundwater in Geyserville Hydrologic Subarea. Sonoma Water requests removal of FRSH to accurately describe groundwater beneficial use designations in the current Basin Plan as shown below.

Findings II.D. Basin Plan [Permit, Page 3]

Thus, beneficial uses applicable to area groundwater within the Geyserville 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), ~~Freshwater Replenishment to Surface Waters (FRSH)~~, aquaculture (AQUA), and Native American Culture (CUL).

5. **Sonoma Water requests clarification, elimination of redundant statements, and consistent references to permit requirements in the Antidegradation Policy Findings. The following changes are recommended to implement these requests.**

Findings II.G. Antidegradation Policy [Permit, Pages 5 to 6]

This Order is consistent with Resolution No. 68-16 because implementation of the Order will result in the application of management measures ~~to treat the discharge of waste~~ that constitutes the best practicable treatment or control of the discharge. This Order contains discharge prohibitions, effluent limitations, receiving water limitations, monitoring requirements, and a requirement for the Discharger to complete a study (see ~~condition R. General Provision VIII.R~~) to assess whether discharges are affecting groundwater quality. These provisions will ensure that the discharge does not result in exceedances of water quality standards and is protective of beneficial uses of groundwater and surface waters within the Geyserville Hydrologic Subarea.

This Order does not authorize an increased volume or concentration of waste, or a decreased level of treatment. This Order includes requirements to develop and implement a source control program (General Provision VIII.F) to prevent toxic pollutants from passing through or interfering with the operation of the wastewater treatment system. ~~This Order also includes effluent requirements to ensure that best practicable treatment and control measures are effective and protective of beneficial uses of groundwater and surface waters.~~

6. **Effluent limitations and monitoring requirements for settleable solids should be removed from the WDRs since the test is not required under state regulations or the Basin Plan. The WDRs include effluent limitations and monitoring requirements for total suspended solids (TSS) which is a better indicator of effluent quality. The following changes are requested.**

Table 4. Effluent Limitations [Permit, Page 8]

Parameter	Units	Effluent Limitations			
		Average Monthly	Maximum Daily	Instantaneous Minimum	Instantaneous Maximum
Settleable Solids	mL/L	0.1	0.2	--	--

Table C-3. Effluent – Monitoring Location EFF-001 [Attachment C, Page 2]

Parameter	Units	Sample Type	Minimum Sampling Frequency
Settleable Solids	mL/L	Grab	Weekly

7. **Sonoma Water requests the following changes to accurately describe the facility’s percolation ponds and the special study compliance approach.**

General Provision VIII.R [Permit, Page 14]

R. Special Study to Evaluate the Potential Impact to Groundwater. The Discharger shall conduct an evaluation to confirm that the discharge of treated municipal wastewater from the ~~community evaporation/percolation ponds~~ to groundwater complies with the groundwater limitations set forth in section VII.A. of this Order. At a minimum, the evaluation must include preparation and submission of a preliminary scope of work that describes the proposed investigative work to be undertaken, a final work plan that includes work tasks and milestones to complete the evaluation, and a final report that presents the results and conclusion of the evaluation. In the event ~~that~~ the final report concludes that discharge from the evaporation/percolation ponds discharge is causing or contributing to exceedances of not attaining groundwater limitations, the final report shall include a work plan with a proposed compliance schedule to bring the discharge into compliance

with groundwater limitations as soon as practicable.

The preliminary scope of work shall be submitted to the Regional Water Board Executive Officer for approval **within 18 months after Order adoption**. The final work plan shall be submitted for approval by the Regional Water Board Executive Officer **within 6 months after approval of the preliminary scope of work**. The Discharger shall implement the approved final ~~work plan~~ work plan per the schedule of implementation and, if applicable, per the compliance schedule set forth to bring the discharge into compliance with groundwater limitations.

8. **The WDRs are missing details on how to determine compliance with average monthly and maximum daily effluent limitations. The following text is proposed for addition to Provision IX. and is consistent with final language in the ALWSZ permit.**

Compliance Determination IX. [Permit, Page 16]

C. Average Monthly Effluent Limitation (AMEL)

The arithmetic mean of all samples collected in a calendar month, calculated as the sum of all samples in a calendar month divided by the number of samples. If only one sample is collected in a calendar month, that sample result will constitute the monthly average and daily maximum results for the purpose of determining compliance with effluent limitations.

If the average of daily discharges over a calendar month exceeds the AMEL for a given parameter, this will represent a single violation, though the Discharger will be considered out of compliance for each day of that month for that parameter (e.g., resulting in 31 days of non-compliance in a 31-day month). If only a single sample is taken during the calendar month and the analytical result for that sample exceeds the AMEL, the Discharger will be considered out of compliance for that calendar month. The Discharger will only be considered out of compliance for days when the discharge occurs. For any one calendar month during which no sample (daily discharge) is taken, no compliance determination can be made for that calendar month.

D. Maximum Daily Effluent Limitation (MDEL)

If a daily discharge (or when applicable, the median determined by subsection A, above, for multiple sample data of a daily discharge) exceeds the MDEL for a given parameter, the Discharger will be considered out of compliance for that parameter for that one day only within the reporting period. For any one day during which no sample is taken, no compliance determination can be made for that day.

9. **To simplify and clarify the intent and purpose of influent and effluent monitoring requirements, explanatory information should be moved from the tables of monitoring requirements to the footnotes. The footnotes should then be modified to correctly specify information needed to evaluate compliance with permit provisions. Effluent monitoring for compliance with pH limitations was inadvertently omitted from Table 2 and should be included.**

In addition, the effluent monitoring frequency for Title 22 Pollutants should be based on the "Special Study to Evaluate the Potential Impact to Groundwater" (General Provision VIII.R). Sonoma Water agrees to conduct one sampling event to inform the special study process. The final study report will include recommendations for future monitoring subject to approval by the Executive Officer. As written, annual monitoring is required for the entire permit term which could be 10 years or more, depending on when the WDRs are reissued by the Regional Water Board.

The following changes are requested to implement these conditions.

Monitoring Requirements III. [Attachment C, Pages 2 to 3]

A. Influent. The Discharger shall measure and record the volume of influent wastewater at Monitoring Location INF-001 as follows:

Table C-2. Influent Flow – Monitoring Location INF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow ⁴ (Daily, Monthly Average)	mgd	Meter	Continuous

B. Effluent. When discharging at Discharge Point 001, the Discharger shall monitor the volume of treated effluent at Monitoring Location EFF-001 as follows:

Table C-3. Effluent – Monitoring Location EFF-001 [Attachment C, Page 2]

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow ⁴ (Daily, Monthly Average)	mgd ⁴	Meter	Continuous
Chloride	mg/L	Grab	Quarterly ⁵
pH	<u>Standard Units</u>	<u>Grab</u>	<u>Weekly</u>
Nitrogen, Nitrate (as N)	mg/L	Grab	Quarterly ⁵
Nitrogen, Total (as N)	mg/L	Grab	Quarterly ⁵
Total Dissolved Solids	mg/L	Grab	Quarterly ⁵
Title 22 Pollutants ⁶	ug/L	Grab	<u>Annually At least one time⁷; first sampling event to take place May 2020</u>

⁴ The Discharger shall report the daily average and monthly average flows.

⁴ Average daily flow mgd over a calendar week.

⁵ The quarterly samples shall be collected during the months of February, May, August, and November each year.

⁶ Table 64431-A, MCLs – Inorganic Chemicals (§ 64431) and Table 64444-A, MCLs – Organic Chemicals (§ 64444).

⁷ The first Annual Sampling event must take place in May 2020. The frequency and requirements for subsequent monitoring events will be determined by the results of the special study required by General Provision VIII.R and approved by the Executive Officer.

10. Recent permits issued by the Regional Water Board have allowed submittal of Self-Monitoring Reports (SMRs) on a quarterly basis, rather than monthly. For example, requirements for quarterly SMRs were included in the recent NPDES permits issued for the City of Ukiah (Order No. R1-2018-0035), the City of Healdsburg (Order No. R1-2016-0015), and the Graton Community Services District (Order No. R1-2018-0001). The City of Ukiah’s permit includes requirements for percolation pond disposal of secondary treated effluent as well as discharge to the Russian River. These treatment facilities and their potential impacts to receiving waters are much larger than represented by the GSZ WWTF. Sonoma Water is requesting a reduction in reporting frequency from monthly to

quarterly to save staff time and resources. The following changes are requested to allow the Sonoma Water to submit quarterly SMRs under the new permit.

Reporting Requirements IV.A. Self-Monitoring Reports (SMRs) [Attachment C, Pages 3 to 5]

1. The Discharger shall submit ~~monthly~~ quarterly SMRs including the results for all monitoring specified in this MRP. If the Discharger monitors any pollutant more frequently than required by this Order, the results of this monitoring shall be included in the calculations and reporting of the data submitted in the SMR.
 2. ~~Monthly~~ Quarterly SMRs shall be submitted by the first day of the second calendar month, following the end of each quarter ~~month of sampling~~. All monitoring results shall include complete laboratory data sheets for each analysis and be submitted in conjunction with the ~~monthly~~ quarterly SMR. Annual summary reports shall be submitted by March 1st each year.
 6. The Discharger shall submit ~~monthly~~ quarterly SMRs in accordance with the following requirements:
 - c. The ~~Monthly~~ Quarterly SMRs, Annual Report, and Source Control Activity Report must be submitted to the Regional Water Board, signed and certified as required by the General Provisions, to: NorthCoast@waterboards.ca.gov or on disk (CD or DVD) in a Portable Document Format (PDF) file in lieu of paper-sourced documents.
- 11. General Provision VIII.F requires submittal of an annual summary of source control activities as part of the Discharger's Annual Report due by March 1st of each year. Sonoma Water requests modification to language provided in Attachment C to clarify that only one annual report is required and that the Source Control Activity Report can be included as part of the Annual Report. The recommended changes are provided below.**

Reporting Requirements IV.B.1. [Attachment C, Page 5]

1. **Annual Report.** The Discharger shall submit an annual report, as required by Attachment C, per section IV.A.6.Cc, to the Regional Water Board for each calendar year...

Reporting Requirements IV.B.2 [Attachment C, Page 6]

2. **Source Control Activity Report.** The Discharger shall submit a Source Control Activity Report, as part of the annual report required by Attachment C, per section IV.A.6.Cc, to the Regional Water Board for each calendar year.
- 12. To match requirements specified in the Source Control Provisions of the permit (General Provision VIII.F), the annual report should include a summary of public outreach activities conducted during the calendar year. The following additional reporting requirements (as included in the ALWSZ permit) is requested.**

Reporting Requirements IV.B.2. Source Control Activity Report. [Attachment C, Page 6]

- d. 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.
- 13. The name of the State agency that receives spill reports when the Regional Water Board can't be reached is incorrectly identified as CalEMA. The following changes are required to correctly identify the reporting agency.**

Footnote [Attachment C, Page 6]

⁷⁸ 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.

Sonoma Water appreciates your assistance and response to these requests. Please contact me at (707) 521-1866 (or by email, Wendy.gjestland@scwa.ca.gov) if you have any questions or concerns.

Sincerely,



Wendy Gjestland
Water Agency Principal Engineer

c: Ben Zabinsky, Regional Water Board
Nazareth Tesfai, Garrett Walker, Ellen Simm, Pam Jeane, Verne Ball – Sonoma Water
Denise Conners – Larry Walker Associates