

California Regional Water Quality Control Board

San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
City of Petaluma, Ellis Creek Water Recycling Facility
Petaluma, Sonoma County

The Regional Water Board received written comments from the City of Petaluma on a tentative order distributed for public comment. The comments are summarized below in *italics* (paraphrased for brevity) and are followed by a staff response, except for City comments 2, 3, and 4, which requested minor editorial and formatting changes that we incorporated into the Revised Tentative Order. For the full content and context of the comments, please refer to the comment letter. To request a copy of the comment letter, see the contact information in Fact Sheet section 7.7 of the Revised Tentative Order.

All revisions to the tentative order are shown with underline text for additions and ~~strikethrough~~ text for deletions.

Comment 1: *The City requests that we adjust the due date for evaluation of local limits.*

Response: We agree with the City's suggestion to adjust the due date to be consistent with the timeline provided in other recently adopted permits.

We revised Provision 5.3.4.1.4 of the tentative order as follows:

Evaluation of the need to revise local limits under 40 C.F.R. section 403.5(c)(1) and, within 180 days following the effective date of this Order by March 1, 2027, submission of a report describing the changes, with a plan and schedule for implementation.

Comment 5: *The City requests that we correct the effluent monitoring frequency for dioxin-TEQ and footnotes in Table F-9. The City also requests the removal of selenium in Table F-9.*

Response: We agree with the corrections to Table F-9.

We revised Table F-9 of the tentative order as follows:

Table F-1. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001 ^[2]	Effluent REC-001 ^[2]	Receiving Water RSW-004, RSW- 005, RSW-006 ^[2]	Biosolids BIO-001 ^[2]
Flow	Continuous/D	Continuous/D	Continuous/D	-	-
BOD	1/Week	1/Week	-	-	-
TSS	1/Week	1/Week	-	-	-

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001 ^[2]	Effluent REC-001 ^[2]	Receiving Water RSW-004, RSW- 005, RSW-006 ^[2]	Biosolids BIO-001 ^[2]
pH	-	1/Day	-	1/Month	-
Ammonia, Total	-	1/Month	-	1/Month	-
Temperature	-	1/Day	-	1/Month	-
Chronic Toxicity	-	1/Quarter	-	-	-
Chlorine, Total Residual	-	Continuous/1H ^[7]	-	-	-
Copper, Total Recoverable	-	1/Month	-	-	-
Cyanide	1/Month	1/Month	-	-	2/Year
Dioxin-TEQ	-	~~1/Year~~ Once	-	-	-
~~Selenium~~	-	~~1/Month~~	-	-	-
Secondary-Treated Effluent Equalization Time	-	1/Week	-	-	-
<i>Enterococcus</i> Bacteria	-	1/Week	-	-	-
Conductivity	-	-	-	1/Month	-
Hardness	-	-	-	1/Month	-
Salinity	-	-	-	1/Month	-
Turbidity	-	-	-	1/Month	-
Dissolved Oxygen	-	-	-	1/Month	-
VOC ^[3]	Once	Once ^[6]	-	-	Once
BNA ^[4]	Once	Once ^[6]	-	-	Once
Metals and Metalloids ^[5]	1/Month	1/Month	-	-	1/Quarter
Mercury	1/Quarter	1/Quarter	-	-	1/Quarter
Priority Pollutants (except VOCs, BNAs, and chlorinated pesticides) ^[6]	-	Once	-	Once	-

Footnotes:

^[1] The Discharger must also comply with the monitoring requirements in the Mercury and PCBs Watershed Permit (NPDES Permit CA0038849) and the Nutrients Watershed Permit (NPDES Permit CA0038873).

^[2] The MRP defines these sampling frequencies.

^[3] VOC: volatile organic compounds

^[4] BNA: base/neutrals and acid extractable organic compounds.

^[5] The metals and metalloids are arsenic, cadmium, chromium, copper, lead, nickel, selenium, silver, and zinc.

^[6] Priority pollutant monitoring is only required at Monitoring Location RSW-002A while discharging from Discharge Point 001 and Monitoring Location RSW-005 while discharging from Discharge Point 002.

^[7] When dechlorinating naturally through the polishing wetlands, effluent chlorine concentrations are to be measured by collecting grab samples twice daily at least four hours apart.

Comment 6: *The City requested that we update Attachment G, Provision 1.9.1 for consistency with the Fact Sheet.*

Response: We agree with the City's suggested edit.

We revised Attachment G Provision 1.9.1 to the following:

- 1.9.1. ~~Neither the~~ The treatment ~~nor the discharge~~ of pollutants shall not create ~~pollution, contamination, or a nuisance~~ as defined by California Water Code section 13050.