

Central Valley Regional Water Quality Control Board
7/8 December 2017 Board Meeting

Response to Written Comments on
Tentative Waste Discharge Requirements for
City of Mount Shasta
Mount Shasta Wastewater Treatment Plant
Siskiyou County

At a public hearing scheduled for 7/8 December 2017, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) will consider the adoption of Waste Discharge Requirements (NPDES No. CA0078051) for the City of Mount Shasta's (City's) Wastewater Treatment Plant (WWTP). This document contains responses to written comments received from interested parties in response to the tentative order. Written comments from interested parties were required to be received by the Central Valley Water Board by 16 October 2017 in order to receive full consideration. Comments were received prior to the deadline from:

1. Debbie Webster (Executive Officer of the Central Valley Clean Water Association [CVCWA]) (received 16 October 2017)

Written comments from the above interested party are summarized below, followed by the response of Central Valley Water Board staff.

CVCWA COMMENTS

CVCWA COMMENT #1 – Maximum Daily Effluent Limit (MDEL) for Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS)

Commenter states that because the tentative order establishes an average weekly effluent limit (AWEL) for BOD and TSS that the MDEL for these constituents is unnecessary and requests that it be removed from the Tentative Order.

RESPONSE:

The tentative order includes both final and interim effluent limits for BOD/TSS. The final BOD/TSS effluent limits are based on the capabilities of a tertiary treatment process while the interim BOD/TSS effluent limits are based on the capabilities of a secondary treatment process pursuant to 40 CFR 133. As described in the fact sheet of the tentative order, because the City's WWTP is currently implementing secondary treatment technology, and because the Discharger has not been able to consistently produce final treated effluent during the shoulder periods that meets applicable BOD/TSS limits, the interim MDEL for BOD/TSS is included to ensure that the treatment works are not organically overloaded.

The City is proposing to upgrade its WWTP to tertiary treatment during the term of the tentative order. Upon completion of upgrades to the WWTP, implementation of an MDEL for BOD/TSS may be an overly stringent and unnecessary control. Therefore, Central Valley Water Board staff concurs that final MDELs for BOD/TSS are unnecessary and they have been removed from the Tentative Order. However, the interim MDELs for BOD/TSS, which are based on secondary treatment, shall remain in the tentative order to ensure that organic overloading of the system does not occur. Additionally, to be consistent with the removal of the final MDEL for BOD/TSS, the maximum daily limit for BOD/TSS has been removed from the land and recycled water discharge specifications in the Tentative Order

CVCWA COMMENT #2 – Recycled Water Use Buffer Zones

The City is proposing to upgrade its WWTP to tertiary treatment during the term of the tentative order but currently only produces secondary-treated wastewater. California Code of Regulations, Title 22 allows unrestricted land application of tertiary-treated wastewater but requires buffer zones for secondary-treated wastewater. In anticipation of the WWTP upgrading to tertiary treatment, CVCWA requests that the buffer zone requirements in the tentative order be removed, with interim buffer zone requirements to be in effect until the WWTP is upgraded.

RESPONSE:

As described in section IV.H.1 of the fact sheet of the tentative order, land application of treated wastewater is regulated under Water Recycling Requirements Order No. 5-01-083, a separate permit issued to the Mt. Shasta Golf Resort. The buffer zone and other requirements included in the recycling specifications section IV.C have been removed from the tentative order and are incorporated now only by reference to Order No. 5-01-083. Following the completion of the WWTP upgrades, Order No. 5-01-083 may be reissued to reflect any future buffer zone changes.

CVCWA COMMENT #3 – Missing Language in Fact Sheet

Commenter notes that Provision IV.C.2 references section III.E.2 of the Fact Sheet, however, this referenced section is missing from the tentative order.

RESPONSE:

The tentative order inadvertently omitted section III.E.2. The tentative order has been revised as shown in strike/underline to include section III.E.2:

The State Water Resources Control Board adopted Resolution 2009-0011, "Policy for Water Quality Control for Recycled Water," (Recycled Water Policy) on 3 February 2009. Section 4 of the Recycled Water Policy, Mandate for the Use of Recycled Water, paragraph a (2) states, "Agencies producing recycled water that is available for reuse and not being put to beneficial use shall make

that recycled water available to water purveyors for reuse on reasonable terms and conditions. Such terms and conditions may include payment by the water purveyor of a fair and reasonable share of the cost of the recycled water supply and facilities.” The Central Valley Water Board adopted a similar resolution, Resolution No. R5-2009-0028, “Resolution in Support of Regionalization, Reclamation, Recycling and Conservation for Wastewater Treatment Plants,” on 23 April 2009.

This Order requires the Discharger to recycle its treated wastewater to the maximum extent practicable. The Discharger is not expected to shoulder the entire cost of providing recycled wastewater, however some incremental cost to the City is warranted if a recycled water project is practicable, and the user is willing to pay its fair share of the incremental costs associated with producing, transporting and using the recycled water.

CVCWA COMMENT #4 – Reopener Provisions

The City is planning significant WWTP upgrades, including repair to the outfall, to come into compliance with copper and zinc final effluent limitations. CVCWA requests that the tentative order include a broader reopener provision to allow the City to reopen the permit after the WWTP outfall is upgraded provided a new mixing zone study is conducted based on the design of the upgraded outfall.

RESPONSE:

The tentative order already includes a “Mixing Improvements” reopener that allows the permit to be reopened and modified to increase dilution credits and/or modify final effluent limitations based on implementation of measures that improve mixing dynamics. The reopener has been modified in the tentative order as follows:

Mixing Improvements. This Order may be reopened to increase dilution credits and/or modify final effluent limitations, if appropriate, based on implementation of measures that improve mixing dynamics and ~~minimize the size of the mixing zone(s)~~. These improvements may include modifications to the diffuser.

CVCWA COMMENT #5 – TUc Trigger for Chronic Toxicity

The tentative order grants aquatic life dilution credits (3:1 for acute and 4:1 for chronic) for calculation of copper, zinc, and ammonia final effluent limitations. The tentative order sets the chronic toxicity monitoring trigger as >1 TUc. CVCWA requests that, to be consistent with dilution granted for other constituents, dilution be considered to adjust the chronic toxicity numeric monitoring trigger to >3 TUc.

RESPONSE:

Consideration of dilution and the granting of dilution credits is a discretionary action by the Central Valley Water Board. Consideration for dilution may be limited or denied on a constituent-by-constituent basis. The Discharger continues to be under a time schedule order and compliance schedule for numerous pollutants in their discharge and is in the process of designing and constructing improvements to the Facility, including modifications to the outfall diffuser, to meet final effluent limitations. Therefore, Central Valley Water Board staff does not agree that the chronic toxicity numeric monitoring trigger should be changed at this time. However, the "Mixing Improvements" reopener gives the City an opportunity to provide information, including additional whole effluent toxicity testing using a full dilution series and/or information regarding improved mixing dynamics, to support an increased chronic toxicity numeric monitoring trigger in the future. Additionally, the "Whole Effluent Toxicity" reopener in the tentative order has been revised to more clearly state that the permit may be reopened to include a revised chronic toxicity numeric monitoring trigger based upon results from a Toxicity Reduction Evaluation or Toxicity Evaluation Study as appropriate.