Central Valley Regional Water Quality Control Board
8/9 December 2022 Board Meeting

Response to Comments
for
Linda County Water District Wastewater Treatment Plant
Tentative Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested persons and parties regarding the tentative Waste Discharge Requirements (WDRs), National Pollutant Discharge Elimination System (NPDES) Permit CA0079651 renewal for the Linda County Water District (Discharger), Wastewater Treatment Plant (Facility) discharge either to the Feather River or the Feather River via evaporation/percolation ponds within the Feather River floodplain.

The tentative NPDES Permit was issued for a 30-day public comment period on 3 October 2022 with comments due by 2 November 2022. The Central Valley Water Board received public comments regarding the tentative Permit by a day after the comment period closed from Jo Anne Kipps. Some changes were made to the proposed Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

JO ANNE KIPPS (KIPPS) COMMENTS

1. **KIPPS COMMENT #1 - Groundwater Characterization**
   Ms. Kipps is requesting that discharge to the percolation ponds be permitted under a separate land discharge permit, not as part of the NPDES permit. Ms. Kipps also request additional monitoring parameters be added to further characterize groundwater along with increasing the monitoring frequency from twice a year to quarterly based on concerns about hydraulic loading, organic matter and chlorine resulting in metals being mobilized in the subsurface and the creation of trihalomethanes in groundwater. Further she requests the most recent eight sampling events be summarized along with the groundwater studies that were performed during the past permit term, contending that groundwater well electrical conductivity data shows degradation downgradient of the discharge to the ponds. She is requesting staff address the groundwater gradient determination from the Discharger's 23 June 2011 groundwater technical memorandum along with including a well assessment study. Lastly, she is requesting adding a brief discussion of the City of Yuba City's wastewater treatment plant percolation ponds.

RESPONSE:

Permit Type. Central Valley Water Board Staff do not concur that the discharge to the percolation ponds should be regulated separately under a land discharge Waste Discharge Requirements Order. In California, orders regulating point source discharges serve as NPDES permits for purposes of the Clean Water Act and waste discharge requirements under the Porter-Cologne Water Quality Control Act. Waste discharge requirements regulating impacts to groundwater from treatment or storage ponds can be included in the NPDES permit/order or in a separate WDRs order specific to the facility's impacts on groundwater. In the specific case of Linda County Water District's WWTP there are two discharge points, one directly to surface water (Discharge Point 001) and a second one to surface water indirectly through discharges to percolation ponds via groundwater or from the percolation ponds directly to surface water when they are over topped by the Feather River (Discharge Point 002). The percolation pond discharges that make their way into the subsurface will eventually either travel west to the current Feather River channel or east to the former Feather River channel which travels north to south on the eastern side of the percolation ponds adjacent to the levee and eventually drain into the current Feather River channel. Because the surface water and groundwater discharges are so interrelated in this case, Central Valley Water Board staff determined that a single order for the surface and groundwater discharges is the best fit for this specific scenario.

Additional Groundwater Monitoring. As discussed previously, the discharge to the percolation ponds eventually becomes a surface water discharge whether the ponds are overtopped or discharge to the ponds travel through the subsurface to the Feather River. However, Central Valley Water Board Staff share the same concern that Ms. Kipps expresses about hydraulic loading of the ponds mixed with organics and chlorine from the discharge along with organics from plant growth in the ponds. This can result in an increase in groundwater alkalinity and hardness resulting in depletion of soil oxygen followed by mobilization of soil metals including iron, manganese, and arsenic degrading the groundwater and eventually discharging to the surface water. Therefore, Central Valley Water Board Staff have added the additional groundwater monitoring requested by Ms. Kipps and have increased monitoring frequency from twice per year to quarterly to be consistent with other facilities with similar discharge rates. The following Table E-6. Groundwater Monitoring Requirements was modified along with the addition of Table Notes "c" through "e" to add additional monitoring requirements and to increase the monitoring frequency to quarterly as shown in part below:

Table E-6. Groundwater Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency
Depth to Groundwater	±0.01 feet	Measurement	1/Quarter

Parameter	Units	Sample Type	Minimum Sampling Frequency
Groundwater Elevation	±0.01 feet	Calculated	1/Quarter
Gradient	feet/feet	Calculated	1/Quarter
Gradient Direction	degrees	Calculated	1/Quarter
Electrical Conductivity @ 25°C	µmhos/cm	Grab	1/Quarter
pH	standard units	Grab	1/Quarter
Total Nitrogen as N	mg/L	Grab	1/Quarter
Total Dissolved Solids	mg/L	Grab	1/Quarter
Total Organic Carbon	mg/L	Grab	1/Quarter
Iron, Dissolved	µg/L	Grab	1/Quarter
Manganese, Dissolved	µg/L	Grab	1/Quarter
Arsenic, Dissolved	µg/L	Grab	1/Quarter
Hardness, Total (as CaCO3)	mg/L	Grab	1/Quarter
Alkalinity, Total (as CaCO3)	mg/L	Grab	1/Quarter
Standard Minerals	µg/L	Grab	1/Quarter
Total Trihalomethanes	µg/L	Grab	1/Quarter

2. **Table E-6 Testing Requirements.** The Discharger shall comply with the following testing requirements when monitoring for the parameters described in Table E-6:

    c. **Standard minerals** shall include the following: boron, calcium, iron, magnesium, potassium, sodium, chloride, manganese, phosphorus, total alkalinity (including alkalinity series), and hardness, and include verification that the analysis is complete (i.e., cation/anion balance).

    d. **Total Trihalomethanes** shall include the following: chloroform, bromoform, chlorodibromomethane, and dichlorobromomethane.

    e. **Minimum Sampling Frequency.** For each constituent the Discharger can demonstrate, after three years of quarterly monitoring, that the data ranges, averages, and standard deviations are similar for quarterly versus twice a year, the minimum sample frequency can be reduced to twice a year.

The following Table F-17. Summary of Monitoring Changes was modified to include the justifications for the increase in groundwater monitoring constituent and frequency as shown in part below:

Table F-17 Summary of Monitoring Changes

Parameter, Units	Type of Monitoring	Prior Sample Frequency	Revised Sample Frequency	Reason for Change
Depth to Groundwater, ±0.01 feet	Groundwater	2/Year	1/Quarter	Assess seasonal gradient fluctuations
Groundwater Elevation, ±0.01 feet	Groundwater	2/Year	1/Quarter	Assess seasonal gradient fluctuations
Gradient, feet/feet	Groundwater	2/Year	1/Quarter	Assess seasonal gradient fluctuations
Gradient Direction, degrees	Groundwater	2/Year	1/Quarter	Assess seasonal gradient fluctuations
Electrical Conductivity @ 25°C, µmhos/cm	Groundwater	2/Year	1/Quarter	Assess seasonal fluctuations
pH, standard units	Groundwater	2/Year	1/Quarter	Assess seasonal compliance with limitations.
Total Nitrogen as N, mg/L	Groundwater	2/Year	1/Quarter	Assess seasonal compliance with limitations.
Total Dissolved Solids, mg/L	Groundwater	--	1/Quarter	Assess seasonal fluctuations
Total Organic Carbon, mg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Iron, Dissolved, µg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Manganese, Dissolved, µg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Arsenic, Dissolved, µg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Hardness, Total (as CaCO3), mg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Alkalinity, Total (as CaCO3), mg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Standard Minerals, µg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations
Total Trihalomethanes, µg/L	Groundwater	--	1/Quarter	Determine background and downgradient concentrations

Groundwater Data and Studies Summary. Central Valley Water Board Staff have added a detailed summary of groundwater well monitoring data collected during the current permit in the proposed Order along with a more detailed discussion of the Staff's findings. Staff concur with Ms. Kipps observation that that downgradient wells appear to show increased concentrations of electrical conductivity. However, the downgradient wells electrical conductivity

concentrations between 2019 and 2021 (MW-2 average is 621 µmhos/cm and MW-3 average is 589 µmhos/cm) are less than the average electrical conductivity concentrations over this same timeframe for the discharge to the percolation ponds (786 µmhos/cm), indicating that there is not an increase beyond what would be expected from the discharge or what the Central Valley Water Board previously authorized.

The following revisions have been made to the Fact Sheet – Attachment F, section III.E.1, beginning with the fourth paragraph to include the groundwater monitoring well data collected over the past permit term and revisions to discuss electrical conductivity, and the Discharger's participation in the Prioritization and Optimization Study for the Salt Control Program, including a trigger of 1,000 µmhos/cm trigger to update their Salinity Evaluation and Minimization Plan:

> In existing Order R5-2017-0094, the Central Valley Water Board found that considering all data, the groundwater did not exceed water quality objectives; therefore, the Discharger was in compliance with the Basin Plan.

Table F-6 pH Groundwater Monitoring Data (standard units)

Date	MW-1 (Up Gradient)	MW-2 (Down Gradient)	MW-3 (Down Gradient)
13 December 2017	7.3	7.5	7.3
16 May 2018	7.2	7.0	6.2
11 July 2018	7.2	6.7	6.6
17 April 2019	7.1	6.5	6.4
17 July 2019	7.2	6.5	6.5
5 February 2020	7.3	7.2	7.0
15 July 2020	6.5	7.2	6.5
5 May 2021	6.9	6.8	6.6
14 July 2021	7.3	7.5	7.1

Table F-7 Electrical Conductivity Groundwater Monitoring Data (µmhos/cm)

Date	MW-1 (Up Gradient)	MW-2 (Down Gradient)	MW-3 (Down Gradient)
13 December 2017	581	563	631
16 May 2018	226	499	769
11 July 2018	331	559	780
17 April 2019	210	465	873
17 July 2019	210	572	535
5 February 2020	482	532	492
15 July 2020	762	635	609
5 May 2021	232	796	639
14 July 2021	221	726	686

Table F-8 Fecal Coliform Groundwater Monitoring Data (MPN/100 mL)

Date	MW-1 (Up Gradient)	MW-2 (Down Gradient)	MW-3 (Down Gradient)
13 December 2017	< 1.8	< 1.8	1.8
16 May 2018	< 1.8	< 1.8	1.8
11 July 2018	13	< 1.8	< 1.8
17 April 2019	< 210	< 1.8	< 1.8
17 July 2019	< 1.8	< 1.8	< 1.8
5 February 2020	< 1.8	< 1.8	< 1.8
15 July 2020	2	< 1.8	< 1.8
5 May 2021	< 1.8	< 1.8	< 1.8
14 July 2021	< 1.8	< 1.8	< 1.8

Table F-9 Total Nitrogen (as N) Groundwater Monitoring Data (mg/L)

Date	MW-1 (Up Gradient)	MW-2 (Down Gradient)	MW-3 (Down Gradient)
13 December 2017	0.2	3.8	45
16 May 2018	0.76	5.3	32
11 July 2018	1.1	0.8	24
17 April 2019	7.7	1.3	19
5 February 2020	8.8	1.8	7.1
15 July 2020	5.1	2.8	6.3
5 May 2021	4.2	11	4.4
14 July 2021	3.4	4	6.3

Based on the analysis of the data collected during the previous permit term, discharge to the percolation ponds is not contributing to the degradation of groundwater quality with respect to pH, fecal coliform, or total nitrogen. Over the past five years, downgradient well (MW-3) had elevated concentrations of nitrogen, which was at its maximum of 48 mg/L following the Oroville Dam spillway collapse in 2017. Subsequent nitrogen samples were lower each time until they stabilized below 10 mg/L since 2020, demonstrating that if there was a source of nitrogen prior to 2017 that it appears to be mitigated.

Electrical conductivity appears to be elevated in downgradient wells versus the upgradient well based on average concentrations, but the average concentrations between April 2019 and July 2021 are less than 700 µmhos/cm for all three wells. The elevated concentrations in the downgradient wells are to be expected considering the WWTP effluent concentrations typically ranged from 524 to 831 µmhos/cm and the average over the same date range is 786 µmhos/cm. The comparison of effluent to groundwater EC concentrations demonstrate that concentrations are very similar in downgradient wells as compared to the effluent.

The Discharger selected to participate in the Prioritization and Optimization Study for the Salt Control Program. To help ensure that the Discharger

continues to implement salinity reduction measures, this Order includes a trigger of 1000 µmhos/cm for electrical conductivity to update the Salinity Evaluation and Minimization Plan. Furthermore, this Order requires the Discharger to comply with the new Salinity Control Program (i.e., to participate in the P&O Study). To continue to determine the influence the pond discharge has on groundwater, more frequent electrical conductivity monitoring, along with specific constituents like chloride and sodium have been added to the groundwater monitoring and reporting program in this Order.

The data discussed above demonstrates that discharges from the percolation ponds to the groundwater are in compliance with the Basin Plan. Therefore, the discharges meet the pre-conditions for an exemption to the requirements of Title 27 pursuant to Title 27 CCR section 20090(b). This Order requires the Discharger to continue groundwater monitoring including more robust and more frequent monitoring to evaluate impacts to groundwater and assure protection of beneficial uses.

Additional justification for allowing some degradation in the groundwater for electrical conductivity as a result of allowing discharge to the percolation ponds was added to the Fact Sheet – Attachment F, Antidegradation Policies, section IV.D.4.d for groundwater as follows:

d. **Groundwater.** The Discharger utilizes five unlined percolation ponds located in the Feather River floodplain for discharge of tertiary treated effluent. Domestic wastewater contains constituents such as total dissolved solids, specific conductivity, pathogens, nitrates, organics, metals, and oxygen demanding substances. Percolation from the percolation ponds may result in an increase in the concentration of these constituents in groundwater. The State Anti-Degradation Policy generally prohibits the Central Valley Water Board from authorizing activities that will result in the degradation of high-quality waters unless it has been shown that any change will be consistent with maximum benefit to the people of the State, will not unreasonably affect present and anticipated beneficial use of such water, and will not result in water quality less than that prescribed in applicable policies; and that any activity which produces or may produce a waste or increased volume or concentration of waste will implement the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained.

   The Facility is designed and constructed to provide tertiary level treatment and disinfection to treat municipal domestic wastewater prior to discharge. This level of treatment may result in limited groundwater degradation not exceeding water quality objectives. Providing wastewater treatment to the community is in the best interest of the

people of the State. The Discharger's treatment constitutes best practicable treatment or control and complies with the State Anti-Degradation Policy.

This Order does not authorize an increase in flow or mass of pollutants to groundwater beyond the levels authorized in Order R5-2017-0094 as amended by Order R5-2019-0081. As discussed in section III.E.1 of the Fact Sheet, groundwater monitoring results do not indicate degradation of groundwater quality when compared to background, with the exception of electrical conductivity. However, electrical conductivity meets all applicable water quality objectives for salinity. The technology, energy, water recycling, and waste management advantages of municipal utility service far exceed any benefits derived from a community otherwise reliant on numerous concentrated individual wastewater systems, and the impacts on water quality will be substantially less. The degradation will not unreasonably affect present and anticipated beneficial uses of groundwater or result in water quality less than water quality objectives. The Discharger selected to participate in the Prioritization and Optimization Study for the Salt Control Program. To help ensure that the Discharger continues to implement salinity reduction measures, this Order includes an electrical conductivity trigger of 1,000 µmhos/cm (annual average). Furthermore, this Order requires the Discharger to comply with the new Salinity Control Program (i.e., to participate in the P&O Study and implement the SEMP).

Staff have included a summary of groundwater studies submitted by the Discharger over the previous permit term in the Fact Sheet – Attachment F, section VII.C.2.c and d as follows:

c. **Groundwater Dilution Verification Study Results.** The Discharger was required by the previous Order to investigate the percolation ponds interaction with the underlying groundwater to verify that pond discharge to groundwater and ultimately surface water can continue to include dilution credits for the effluent discharge that ultimately reaches surface waters. Out of 17 samples for bis (2-ethylhexyl) phthalate from each well from May 2019 through September 2020, only one sample in each well had estimated value of 0.5 µg/L and all other samples were non-detect. This is below the MCL of 4 µg/L in groundwater for (2-ethylhexyl) phthalate. Out of 11 samples for total trihalomethanes from each well between September 2012 and July 2017, the maximum concentration of total trihalomethanes was less than 4 µg/L, where the maximum effluent concentration during this time frame was 90 µg/L. Based on the results of the study, the discharge is not contributing to the degradation of groundwater quality between

2012 and 2017 for bis (2-ethylhexyl) phthalate and total trihalomethanes.

d. **Groundwater Well Relocation Study and Groundwater Quality Study.** These were optional studies in the previous permit and the Discharger did not perform them.

Groundwater Gradient, Monitoring Well Network Study and Yuba City Percolation Ponds Description. The Discharger's 23 June 2011 *Linda County Water District Wastewater Treatment Plant Hydrogeologic Assessment Report* (Kennedy/Jenks Consultants), stated the following:

> *The three (3) monitoring wells around the District's ponds are placed in locations that do not yield an accurate calculation of groundwater gradient away from the ponds. The wells are placed to the east, west and southwest corners of the ponds with no two wells configured in such a manner that the difference in measured groundwater elevations within the wells would yield a meaningful gradient calculation.*
>
> *The groundwater gradient at the pond system is much more affected by the fluctuating Feather River water level and the current use of the disposal ponds as their use generally leaves some of the ponds empty and dry for routine maintenance while the effluent is discharged to other ponds within the District's seven (7) pond configuration. Groundwater gradient could be calculated using disposal pond elevation or the elevation of the Feather River to allow two aligned points for a gradient calculation on a radian leading away from the disposal ponds. However, these elevations can change significantly in a relatively short period of time and it is unlikely that the gradient calculations based on these fluctuating points would remain accurate or useful over time.*

Central Valley Water Board Staff agree with the Discharger's finding that groundwater gradients can fluctuate due to influence from the percolation ponds and river. Staff would even add that precipitation and possibly groundwater pumping for irrigation could also affect gradients. Since using the exiting well network does not always produce consistent gradients throughout the year, Staff have included a Groundwater Monitoring Well Network Study to determine if additional monitoring wells are necessary for determining groundwater gradients. The following Groundwater Monitoring Well Study was added as Waste Discharge Requirements section VI.C.2.d and other revisions were included in the proposed Order as necessary:

d. **Groundwater Monitoring Well Study.** The Discharger shall conduct an assessment of the current groundwater monitoring well network to determine if the current well network is adequate for determining compliance with groundwater limitations, including establishment of background concentrations, and determining

groundwater gradients. The Discharger must submit the Groundwater Monitoring Well Study to the Central Valley Water Board with the Report of Waste Discharge on the date provided in the Technical Reports Table of the MRP (Attachment E). If the Discharger determines there is a need to install new groundwater monitoring wells, then the Discharger shall include a summary of the purpose of the relocation, a project schedule, a detail map of the location of the proposed new wells, a work plan for developing the new wells, and if necessary a closure plan for decommissioning of the existing wells, as part of the Groundwater Monitoring Well Study.

Central Valley Water Board Staff revised the Fact Sheet – Attachment F, section II.A. Facility Description, paragraph two as follows to describe how the hydraulic loading to the ponds occurs and provide additional information about the City of Yuba City's percolation ponds:

> The Facility discharges to land using a series of five percolation ponds that lie within the Feather River floodplain. Currently the Discharger discharges to a single pond at a time and once that pond reaches a predetermined level they stop discharging to that pond and start discharging to the next pond in series. They rotate though the five ponds using this sequence, allowing them to perform pond maintenance including discing and mowing prior to reuse. The pond berms have been overtopped during high river stages five times since the Facility was constructed in 1960, most recently in February 2017, resulting in tertiary treated wastewater from the ponds being discharged to the Feather River. The most southeastern point of the Discharger's percolation ponds is approximately 1600 feet upstream from the City of Yuba City's most northern percolation pond. Yuba City is currently discharging to six percolation ponds a majority of the year, while they are working to construct a new diffuser that is submerged year-round, allowing less frequent discharge to their percolation ponds. The Facility currently provides wastewater treatment to a population of approximately 24,000, after the connection of Marysville's collection system to the Discharger's facility in November 2019. The Discharger also maintains a wastewater outfall pipeline terminating on the bank of the Feather River; however, this outfall is rarely used and was not used during the term of previous Order R5-2017-0094.

2. KIPPS COMMENT #2 - Onsite Biosolids Management

Ms. Kipps is requesting for the Facility's current annual biosolids production rate (dry metric tons/year). Ms. Kipps is also requesting that the proposed Order include a description of how the Discharger plans to utilize the planned equalization and sludge storage basins and a description of the Facility's sludge facilities. Further, she requests that the proposed Order require monitoring of groundwater upgradient and downgradient from the Facility's sludge operations, which requires the installation of at least three new monitoring wells. She is requesting that the proposed Order require monitoring of groundwater for constituents EC, total nitrogen

and for metals typically associated with municipal sewage sludge. She is also requesting for the characterization of prevailing wind conditions at the Facility and disclosure of any complaints received of nuisance odors created by the Facility's wastewater and sludge treatment operations. Additionally, this includes evaluating if whether the proximity of the Facility's biosolids storage area to the open-air chlorine contact basins pose a threat of contamination by windborne biosolids contaminants to effluent undergoing chlorination.

RESPONSE:

Biosolids Production, Solids Handling, and Odor Complaints. Central Valley Water Board Staff revised the Fact Sheet – Attachment F, section II.A. Facility Description, paragraphs three and four as follows to provide additional information about the Discharger's current annual biosolids production rate, equalization and sludge storage basins and facilities, characterization of prevailing wind conditions and any complaints received of nuisance odors:

> Solids handling facilities include a rotary drum thickener, two anaerobic digesters, eight sludge drying beds and two a facultative sludge lagoons. One of the sludge lagoons is lined with a 60-mil fused HPDE liner and the other sludge lagoon and eight sludge drying beds are concrete lined with waterstops at the construction and expansion joints. The sludge lagoons each have a decant structure that allows liquid to flow to the headworks. The eight drying beds have underdrains that also flow back to the headworks. Therefore, the sludge lagoons and drying beds are all lined and have drains or decant structures to preventing a release of contaminants to groundwater.
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> The Discharger has received odor complaints by residents at the north end of the plant, which corresponds to the prevailing wind from the southwest, as the HDPE lined sludge lagoon is unable to be adequately emptied before warm weather months, causing the odors. The HDPE lined lagoon stores a majority of sludge produced in the wet weather months when the drying beds are less efficient. The construction of the new 8-million-gallon concrete-lined flow equalization and sludge storage basin is anticipated to allow the complete draining and drying of sludge from the HDPE lined lagoon, which should help to mitigate future odor complains from nearby residents. Annually, the sludge drying beds are manually cleaned and the approximately 400 tons of dewatered solids are disposed of in a landfill. Also, the Discharger has not observed windborne contamination to the chlorine contact basins from the biosolids storage area, especially since the prevailing winds are from the southwest and there is a building just west of the storage area.

Groundwater Monitoring Well Installation and Monitoring. Staff do not concur with Ms. Kipps' recommendation to install groundwater monitoring wells around the sludge handing area. As discussed above in the response "Biosolids

Production, Solids Handling, and Odor Complaints" information has been added to the proposed Order to describe that all sludge handling facilities are lined with either a concrete and water stops or HDPE liner. The sludge lagoons have decant structures and sludge drying beds have drains that can return liquid to the headworks. Therefore, the protections in place are sufficient to assure protection of groundwater beneficial uses and the requirements for additional groundwater monitoring and installation of new monitoring wells are not needed at this time.

Planned Equalization and Sludge Storage Basin. Central Valley Water Board Staff revised the first paragraph of the Fact Sheet – Attachment F, section II.E. Planned Changes, to include additional information about how the Discharger plans to operate their planned equalization and sludge storage basin as follows:

> **E. Planned Changes**
>
> The Discharger plans to construct an 8-million-gallon concrete-lined flow equalization and sludge storage basin to allow for temporarily holding peak wet weather flows and sludge storage. This basin will be constructed with waterstops installed at each joint. During the dry months sludge will be spread out in the basin at a height of 12 to 18 inches for drying. During wet months the sludge will be removed to allow the basin to provide the plant with emergency storage of raw or primary treated influent. The new basin will be located within the current Facility footprint adjacent to the two existing sludge lagoons (sludge lagoon No.1 and No.2). It will be bifurcated by a concrete berm with one decant structure located in the southern half of the basin. This project is began in 2021 and will approximately be completed within a year.

3. KIPPS COMMENT #3 - Stormwater

Ms. Kipps requested that Central Valley Water Board Staff confirm the Discharger's status with respect to its coverage under Water Quality Order 2014-0057-DWQ for stormwater discharges and revise the proposed Order to characterize the Facility's stormwater collection, detention, and disposal operations. If the Discharger does not have coverage under Water Quality Order 2014-0057-DWQ, include information confirming that the Facility's existing network of detention basins has sufficient capacity to accommodate anticipated facility stormwater flows and proper operating requirements to prevent groundwater contamination and mosquito breeding.

RESPONSE: The Discharger performed a grading and stormwater collection project in 2016 to collect and contain stormwater onsite by diverting flows to six onsite retention ponds. The retention ponds are interconnected, and the lowest water level pond can be drained directly to the headworks prior to overtopping. All stormwater detention basins are maintained annually, which includes removing vegetation and debris to allow stormwater conveyance without obstruction. The Discharger has terminated their coverage under Water Quality Order 2014-0057-DWQ since stormwater is contained onsite. The Fact Sheet –

Attachment F, section III.C.9 Storm Water Requirements has been revised to reflect the updates to the stormwater collection system at the Facility and the termination of coverage under 2014-0057-DWQ as follows:

9. **Storm Water Requirements.** U.S. EPA promulgated federal regulations for storm water on 16 November 1990 in 40 C.F.R. parts 122, 123, and 124. The NPDES Industrial Storm Water Program regulates storm water discharges from wastewater treatment facilities. Wastewater treatment plants are applicable industries under the storm water program and are obligated to comply with the federal regulations. The Discharger conducted a Facility upgrade project in 2016, which included modifications to how storm water is collected. Storm water is now collected on site and diverted to six detention basins. The basins are interconnected, and the lowest basin can be emptied directly to the headworks if there is a concern about the basins overtopping. Therefore, the Discharger terminated their coverage under the State Water Board's Industrial Storm Water General Order because the Facility is designed to no longer allow storm water to leave the site. This Order does not authorize discharges of storm water to waters of the United States. Storm water is regulated in this Order under Waste Discharge Requirements section VI.C.4.d.

Since the stormwater collection ponds are no longer regulated by Water Quality Order 2014-0057-DWQ, Staff have added the following stormwater ponds operating requirements to the proposed Order as subsection "d" of Waste Discharge Requirements section VI.C.4, Construction, Operation and Maintenance Specifications as follows to prevent groundwater contamination and mosquito breeding:

d. **Storm Water Detention Basin Operating Requirements.**

i. The discharge of storm water to detention basins shall not cause or contribute to violations of groundwater limitations included in section V.B. of this Order.

ii. Storm water detention basins shall be managed to prevent breeding of mosquitoes. In particular,

(a) An erosion control program should assure that small coves and irregularities are not created around the perimeter of the water surface.

(b) Weeds shall be minimized.

(c) Dead algae, vegetation, and debris shall not accumulate on the water surface.

4. **KIPPS COMMENT #4 - Editorial Comments**

Ms. Kipps requests the Central Valley Water Board revise the Flow Schematic to adequately characterize all the Facility's major waste stream flows and revise the Groundwater Monitoring Wells diagram to depict the current configuration and labeling of percolation ponds from seven ponds to five ponds.

Ms. Kipps also noted that there was a duplicate sentence on page F-79 of the proposed Order, *"The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports"* and that "peculation" was used instead of "percolation" on page F-16.

RESPONSE: Staff concur, and the proposed Order has been revised accordingly. The Flow Schematic was revised to include all the waste streams and the Groundwater Monitoring Wells figure was updated to reflect that there are now five percolation ponds. The other two editorial comments were addressed in the proposed Order.