



June 28, 2016

Matt St. John, Executive Officer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403

RE: City of Santa Rosa Subregional Water Reclamation System NPDES Permit No. CA0022764, WDID No. 1B830990SON, Order No. R1-2013-0001

Subject: 2016 Total Phosphorus Effluent Limitation Compliance Report

Dear Mr. St. John:

This report documents compliance with Final Effluent Limit IV.A.2.b.i (no net loading of total phosphorus) as required Compliance Determination VII.N specified in Order R1-2013-0001, which specifies the following:

- The Permittee will be determined to be in compliance with the effluent limitation in IV.A.2.b.i if the total phosphorus controlled for the previous three years is greater than or equal to the three-year average of total phosphorus discharged; and
- The Permittee shall document compliance with the effluent limitations in an annual report, submitted to the Regional Water Board by July 1st of each year.

In addition, Attachment B of Order No. R1-2013-0048 specifies that “[t]he first compliance determination will occur in 2017, after conclusion of the 2016-2017 discharge season, using a three-year average from the 2014-2015 discharge season through the 2016-2017 discharge season.”

This report updates a reporting framework that will be updated by July 1st each year but does not evaluate compliance. The report submitted in 2017 will be the first such compliance determination.

Table 1 summarizes credits approved by RWQCB for three projects. Credits for the Beretta project were approved by RWQCB on September 20, 2012 based on the City’s June 5, 2012 proposal. Credits for the Pepperwood project were approved by RWQCB on October 18, 2012 based on the City’s June 28, 2012 proposal. Credits for the Ocean View project were approved by RWQCB on April 29, 2015 based on the City’s February 5, 2015 proposal.

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Table 1 also describes the credits that have been earned as validated by the Sonoma Resource Conservation District as documented in a separate report for the Beretta and Pepperwood projects, which require annual monitoring to verify credits resulting from ongoing management practices (see Attachments 1 and 2). Monitoring of the Ocean View project was completed in 2015 and submitted with the 2015 Total Phosphorus Effluent Limitation Compliance Report dated July 1, 2015.

Table 1. Earned Phosphorus Annual Credit Summary (pounds)

	Approved ¹				Validated ²				3-Year Cumulative Total
	Beretta	Pepperwood	Ocean View	Total	Beretta	Pepperwood	Ocean View	Total	
2013	294	526		820	0	543.3		543	--
2014	485	526	5,836	6,847	294	543.3	5,483	6320	--
2015	442	526	5,836	6,804	498	542.8	5,483	6524	13,387
2016	399	526	5,836	6,761					12,844
2017	399	341	5,836	6,576					6,524
2018	399	341		740					0

¹ Approved by RWQCB based on City's proposal

² Validation is based on third party inspection. Validated credits are used to determine compliance. Validation reports can be found in attachments to this report.

Table 2 summarizes discharge of phosphorus. No discharge occurred in the 2013-2014 or 2014-2015 discharge seasons (i.e., October 1 – May 14). During 2015-2016, discharge occurred on March 17, 2016 for the purpose of fulfilling the NPDES Permit requirement to verify the accuracy of the model used to calculate allowable discharges to Santa Rosa Creek.

Table 2. Total Phosphorus Discharged To Laguna de Santa Rosa (pounds)

Discharge Period	Discharge Volume (MG)	Average Total P ¹ (mg/l)	TP Discharged (pounds)	3-Yr Cumulative Total P Discharged (pounds)
2013-2014	0	2.7	0	--
2014-2015	0	3.6	0	--
2015-2016	4.9	2.8	114	114
2016-2017				114

¹ as measured in Delta Pond during discharge season in 2013-2014, in plant effluent in 2014-2015, and in Delta Pond in 2016

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Table 3 compares the validated credits from Table 1 to the discharged quantity of Total Phosphorus from Table 2. Compliance will be determined first in 2017 and annually thereafter using the three-year comparison of validated credits and discharged phosphorus per Attachment B of Order No. R1-2013-0048.

Table 3. Total Phosphorus Effluent Limitation Compliance Summary

Discharge Period	3-Yr Cumulative Total P Credits Earned ¹	3-Yr Cumulative Discharged Total P ²	Balance ³
2013-2014	0	--	--
2014-2015	0	--	--
2015-2016	13,387	114	13,273
2016-2017	12,844	114	12,730
¹ From Table 1. Credits earned in a calendar year are applied to the following discharge season. For example, credits earned in 2014 are applied to the 2014-2015 discharge season.			
² From Table 2.			
³ 2017 is the first year of compliance determination. Positive value in <i>Balance</i> column denotes compliance and negative value indicates non-compliance.			

Should you have any questions or require additional information regarding the above, please contact Rita Miller, Deputy Director of Environmental Services at 707 543-3879

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that significant penalties may be imposed for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Linda Reed
Interim Director of Santa Rosa Water

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Attachments

1. Credit Verification and Annual Monitoring and Reporting for Pepperwood Preserve Sediment Reduction Project – Letter From Sonoma Resource Conservation District dated June 21, 2016
2. Credit Verification and Annual Monitoring and Reporting for Beretta Dairy BMPs Nutrient Offset Project dated June 21, 2016