

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 18/19 April 2024**

**Response To Written Comments for the  
Tuolumne Utilities District  
Sonora Regional Wastewater Treatment Facility  
Tuolumne County  
Tentative Waste Discharge Requirements**

At a public hearing scheduled on 18/19 April 2024, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider the adoption of revised Waste Discharge Requirements (WDRs) and Monitoring and Reporting Program (MRP) Orders for the Tuolumne Utilities District's Sonora Regional Wastewater Treatment Facility (Facility or WWTF) in Tuolumne County.

This document contains responses to written comments received from interested persons regarding the tentative WDRs and MRP Orders circulated on 3 January 2024. Written comments from interested parties were required to be received by the Central Valley Water Board by 5:00 p.m. on 2 February 2024 to receive full consideration. Comments were received by the Tuolumne Utilities District (also referred to as Discharger or TUD) and Jamestown Sanitary District (also referred to as JSD).

Written comments are summarized below, followed by responses from Central Valley Water Board staff. In addition, staff made a few minor changes to the WDRs to improve clarity and fix typographical errors.

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**TUOLUMNE UTILITIES DISTRICT (TUD) COMMENTS**

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**TUD – Comment #1:** TUD contends that the WDRs do not clearly communicate the activities covered by the WDRs. TUD requests that the WDRs clearly communicate that the WDRs regulate the production of treated domestic wastewater and that the distribution, storage, and use of recycled water will be regulated under separate requirements (i.e., currently Master Reclamation Permit Order R5-2002-0202 and eventually Reclamation General Order 2016-0068-DDW).

**Response:** The WDRs regulate only the treatment of domestic wastewater from the Facility. Master Reclamation Permit Order R5-2002-0202 will continue to regulate the offsite reclamation of treated wastewater from the Facility. This is stated in Findings 12 and 48 (previously 51) of the tentative WDRs. However, in an effort to provide further clarity, staff made various revisions to the tentative WDRs (e.g., revised the WDRs title on page 1 and added Finding 5).

**TUD – Comment #2:** TUD requests for the WDRs to include an effective date similar to the MRP because the TUD states that they are not fully prepared for the tentative effective date of May 1<sup>st</sup>. TUD requests for the effective date to be moved to July 1<sup>st</sup> to allow for time to prepare for monitoring and operating under the new WDRs.

**RESPONSE:** According to TUD staff, the upgraded Facility has been in operation since December 2023, and the current WDRs no longer reflect the treatment system since the upgrades have now been constructed. Therefore, staff made no changes to the effective date of the tentative WDRs. However, staff have changed the effective date of the MRP to June 1<sup>st</sup> to provide TUD additional time to prepare for the new monitoring required by the tentative MRP.

**TUD – Comment #3:** The description of the JSD wastewater treatment facility in Finding 18 (previously Finding 20) should be revised to accurately convey that it was upgraded to provide tertiary treatment and that it discharges to TUD’s reclamation system under the JSD-TUD agreement. The current description states that JSD only discharges disinfected secondary effluent to Quartz Reservoir, but the JSD wastewater treatment facility was upgraded with capabilities to provide tertiary treatment.

**RESPONSE:** Staff revised Finding 18 as follows:

*Jamestown Sanitary District (JSD) owns and operates a WWTF (JSD WWTF) permitted under WDRs Order R5 2021 0046, which allows discharges up to 0.23 mgd ADWF of disinfected secondary effluent to TUD’s Reclamation System. Discharge to TUD’s Reclamation System occurs under the Agreement between Jamestown Sanitary District and Tuolumne Utilities District Transfer in Connection with Wastewater Treatment Facilities Improvements Project No. C 06-8000-210 (JSD-TUD Agreement). The JSD WWTF was recently upgraded so that it could treat flows of up to 0.144 mgd to disinfected tertiary standards.*

**TUD – Comment #4:** TUD requests that the requirement for new groundwater monitoring at the WWTF be removed from the WDRs because TUD accommodated Central Valley Water Board’s WDR permitting staff’s concerns about potential impacts to groundwater from the upgraded WWTF. TUD also requested changes to the requirements for evaluating/testing the lined ponds (e.g., Solids Disposal Specification H.7 and Provision I.8).

**RESPONSE:** The RWD submitted in September 2022 by PACE did not mention the installation of an underdrain system below the extended aeration activated sludge basins to detect leaks. However, as part of the comment package, TUD and RBI provided a construction document with information on an underdrain system installed for the basins. Installation of 45-mil liners on the emergency storage and extended aeration activated sludge basins and the underdrain system significantly reduce the Facility’s threat on impacting underlying groundwater provided the liner is properly maintained. Therefore, staff removed the requirement in the WDRs to install a groundwater monitoring well network at the Facility and removed Attachment G, which described the information needed in the Groundwater Monitoring Well Installation Workplan.

Staff also revised Provision I.6 of the WDRs (i.e., requirement to prepare and submit a Liner Operation and Maintenance Plan) to request additional

information about the utilization of the extended aeration basins and emergency pond leak detection systems, including establishing an Action Leakage Level. Furthermore, staff removed Solids Disposal Specification H.7. Staff changed the requirement to monitor the emergency storage pond liner to once every three years starting in 2026 and the requirement to monitor the extended aeration activated sludge basins pond liner evaluation to once per year starting in 2026.

**TUD – Comment #5:** TUD is considering pursuing State Water Resources Control Board, Division of Drinking Water (DDW) approval of a CT lower than 450 mg-min/L, which will require conducting a disinfection validation study and fluoride tracer study of the chlorine contact basins and obtaining DDW approval. TUD contends this study is likely to show that the baffling factor is lower than 0.85. Therefore, it is unnecessary to communicate the baffling factor in the WDRs, being pertinent to the TUD's Title 22 Engineering Report. Requested edits are shown in the attachment. TUD also requests that discharge specification F.9 allow alternative CT and modal contact time for the WWTF, if approved by DDW. TUD is considering conducting a study and requesting DDW approval of a low CT disinfection approach. The requested edits would allow alternative CT and modal contact times to be used at the WWTF (if approved by DDW) without modifying the WDRs.

**RESPONSE:** Staff revised Finding 35 (previous Finding 38) and Discharge Specification F.6 (previously F.9).

**TUD – Comment #6:** TUD provided multiple comments regarding the industrial pretreatment Findings.

**RESPONSE:** Staff made the requested changes to the WDRs.

**TUD – Comment #7:** More than one groundwater monitoring report should be used as the basis for describing the typical groundwater gradient. Currently, the gradient is characterized using only data from the May 2022 quarterly groundwater monitoring event. The current Master Reclamation Permit requires that background groundwater be characterized using at a minimum, four quarterly monitoring events.

**RESPONSE:** Staff reviewed the groundwater gradient at the monitoring locations for the period between the second quarter of 2021 between the first quarter of 2023 and updated Finding 61 (formerly Finding 65).

**TUD – Comment #8:** TUD contends that the WDRs require participation with the Alternative Pathway Permitting approach and would like the WDRs to be revised the language to allow for TUD to switch to the Conservative Permitting approach. In addition, TUD requests that a reopener provision is included to allow for TUD to switch pathways for the salt control program.

**RESPONSE:** Staff revised the WDRs to reflect that TUD may choose to change the permitting pathway for the Salt Control Program in the future. Please note

that provided TUD adequately demonstrates the Facility can comply with the Conservative Permitting approach, the WDRs for the Facility would need to be amended to include the requirements for the Conservative Pathway.

**TUD – Comment #9:** TUD requests that the title of Table 12 be revised to communicate that the table contains groundwater monitoring data as opposed to data in the reservoir. In addition, TUD requests that sulfate be added to the table to explain the variation of TDS across the wells near Quartz Reservoir.

**RESPONSE:** Staff changed the title of Table 12 as requested. However, no changes were made to add sulfate to Table 12 since a majority of the sample dates for all monitoring wells either did not analyze sulfate or it was not applicable as stated in appendix C of the groundwater monitoring reports.

**TUD – Comment #10:** TUD requests that Finding 67 should be revised to state that wells M-1 and M-1R are primarily influenced by water sources other than Quartz Reservoir because evidence suggests that monitoring wells M-1 and M-1R are not influenced by Quartz Reservoir. In addition, TUD states that average TDS and sulfate levels are substantially higher in wells M-1 and M-1R compared to Quartz Reservoir. Furthermore, TUD states that the WDRs have not utilized the USEPA's Unified Guidance to determine whether it is appropriate to use upgradient wells to characterize background conditions to compare downgradient wells to assess degradation by Quartz Reservoir.

**RESPONSE:** Staff revised Finding 64 (previously Finding 67) as requested by TUD, with the exception of the mention of sulfate due to insufficient data as stated in our response to comment eight.

**TUD – Comment #11:** TUD provided multiple comments regarding the antidegradation analysis section of the WDRs and the items/measures listed as best practicable treatment or control (BPTC).

**RESPONSE:** Staff revised the antidegradation analysis section of the WDRs to clarify the scope of the antidegradation analysis and to further clarify that the TUD's distribution, storage, and use of recycled water is covered by the Master Reclamation Permit R5-2002-0203 and will be covered under the State Water Resources Control Board Order, WQ-2016-0068 DDW *Water Reclamation Requirements for Recycled Water Use* (Reclamation General Order) in the future. In addition, staff added findings to summarize the antidegradation analysis provided by Robertson-Bryan Inc. (RBI) in the August 2023 Antidegradation and Background Analysis Report (2023 Antidegradation Analysis Report).

Furthermore, the technical information provided in the antidegradation analysis for constituents of concern was removed. Also, staff recognizes that the interwell analysis used in the antidegradation analysis simplified the difference between upgradient and downgradient well concentrations. The purpose of presenting

data this way was to provide a simple summary of the data for the sites. The detailed analysis, including the intrawell analyses conducted by RBI in the 2023 Antidegradation Analysis Report was greatly valuable for staff in determining if the reclamation activities could be covered under the Reclamation General Order once the Title 22 Engineering Report is accepted by DDW.

**TUD – Comment #12:** TUD requests that requirement C.1 is revised to an effluent flow limitation as opposed to an influent limitation because the emergency storage basin allows the Facility to receive influent flows in excess of the wastewater treatment facility design criteria. Effluent flows represent the flows being treated by the Facility's treatment system. Additionally, TUD requests that the average dry-weather flow limitation be determined using flows into the Facility when groundwater is at or near normal and when runoff is not occurring (e.g., during July through September).

**RESPONSE:** Staff revised requirement C.1 to an effluent flow limitation as requested. In addition, staff provided clarification to the limitation. However, the limitation will apply when no significant rainfall events have occurred (e.g., June through September).

**TUD – Comment #13:** Discharge Specification F.7 should be revised because the specification in Title 22 section 60304 for when coagulation is/not used only pertains to granular media filters, whereas the Veolia Hydrotech Disc Filter is an alternative conditionally accepted filtration technology.

**RESPONSE:** Staff revised Discharge Specification F.6 (previously F.7).

**TUD – Comment #14:** Discharge Prohibition B.2 is redundant to the requirements of Section G, Groundwater Limitations, and should be removed or justification for including duplicative requirements.

**RESPONSE:** Discharge Prohibition B.2 is consistent with other WDRs adopted (see WDRs Order No. R5-2023-0046) by the Central Valley Water Board; therefore, Prohibition 2 was not removed. However, Discharge Specification F.1 is redundant to Groundwater Limitations G and therefore, was removed.

**TUD – Comment #15:** TUD requests that Discharge Specifications F.12 and F.13 be removed because TUD contends that the relationship between dissolved oxygen levels in the extended aeration activated sludge basins and emergency storage basin do not relate to the presence of odors at the boundaries. Furthermore, TUD states that certain portions of the extended aeration activated sludge basins may have dissolved oxygen levels less than 1 mg/L as part of the treatment process. Also, TUD states that low dissolved oxygen and any associated odors may have no perceptible influence on odors at the facility boundary and that TUD staff would monitor and report odors.

**RESPONSE:** Staff retained Discharge Specifications F.11 and F.12 (previously F.12 and F.13). These requirements are necessary to ensure that nuisance and

odor conditions do not occur at the WWTF. Therefore, staff revised Discharge Specification F.10 for any storage ponds (e.g., the emergency storage basin). However, since dissolved oxygen levels less than 1 mg/L appear to be integral to the treatment process, staff removed the requirement for the extended aeration activated sludge basins.

**TUD – Comment #16:** TUD requests corrections to Attachment A the Site Location Map. The requested changes vary from nomenclature used in the legend to the LAAs are not consistent with the LAA map provided on 21 June 2022.

**RESPONSE:** Staff made the requested changes to Attachment A and removed the LAAs since only portions of the areas are utilized for reclamation.

**TUD – Comment #17:** TUD requests edits to Attachment B and Attachment C.

**RESPONSE:** As requested, staff replaced Attachment B with the site plan included in the comment package. Similarly, Attachment C was replaced with the diagram prepared by TUD.

**TUD – Comment #18:** The Central Valley Water Board should consider removing Attachments D, E, and F since the WDRs do not regulate or authorize the distribution, storage, or use of recycled water.

**RESPONSE:** Staff removed Attachments D, E, and F as requested.

**TUD – Comment #19:** TUD provided multiple comments requesting edits to the WDRs for the following:

- Description of the Facility,
- Treatment process description,
- Solids handling and storage,
- Groundwater background and characterization,
- Water quality objectives,
- Salt control program, and
- The information sheet.

**RESPONSE:** Staff made the requested edits to the WDRs.

**TUD – Comment #20:** TUD provided multiple comments requesting edits to the MRP.

**RESPONSE:** Staff reviewed the requested edits for comments one through three of Attachment B provided in the TUD's comment package and made the requested edits to the MRP.

**TUD – Comment #21:** TUD requests that public water supply monitoring be removed from the MRP.

**RESPONSE:** Staff revised the public water supply monitoring to only require EC monitoring, as this information is necessary to evaluate the discharge from the Facility in regard to salinity. In addition, staff retained the requirement to submit the Consumer Confidence Report(s) for the area(s) served by the Facility. This is a consistent requirement in MRPs issued to domestic wastewater treatment facilities.

**TUD – Comment #22:** TUD requests that monitoring of biosolids be removed.

**RESPONSE:** Sludge/biosolids monitoring is essential to ensuring that sludge/biosolids are disposed of in a manner that is protective of human health and the environment. It is also a good indicator for the concentrations of constituents removed from the influent stream. Therefore, biosolids monitoring was not removed; however, staff revised the biosolids monitoring based on additional comments received from RBI.

**TUD – Comment #23:** TUD does not employ a person designated as the “chief of the laboratory,” so they request that the Chief Plant Operator be allowed to certify analyses conducted at the WWTF by the TUD.

**RESPONSE:** Staff included the option for TUD to have the laboratory analysis certified by a chief of the laboratory or the chief plant operator.

**TUD – Comment #24:** The requirement to calculate and report monthly average BOD and TSS for the influent and effluent, as well as the percent removal, should be removed. The WDRs do not include an effluent limitation for percent removal or any threshold pertaining to monthly average BOD and TSS.

**RESPONSE:** Reporting of monthly average BOD and TSS is necessary to ensure compliance with effluent limitations D.1. Therefore, the requirement to report monthly average BOD and TSS was not removed. However, while percent removal is a good indication of the removal efficiency of the treatment system, staff removed the requirement to report BOD and TSS percent removal.

**TUD – Comment #25:** TUD requests MRP, Section III.A.2.a be removed because there are no limitations or action levels in the WDRs that pertain to the 12-month rolling average of total nitrogen and EC in the WWTF effluent. The WDRs include a monthly average limitation for total nitrogen and calendar year average action level for EC. Hence, it would be appropriate to calculate the monthly average total nitrogen concentration and the calendar-year average EC.

**RESPONSE:** The 12-month rolling average salinity requirement is beneficial to determine compliance with the Salinity Action Level as described in E.1 of the WDRs. The Discharger should be monitoring the 12-month rolling average through the year to see if there are changes in the salinity's effluent. Total Nitrogen was removed as requested.

**TUD – Comment #26:** TUD may not be fully prepared by the May 1 effective date to operate and monitor consistent with the new WDRs following the April 18/19 Central Valley Water Board hearing in which the WDRs and Monitoring and Reporting Program will be adopted. TUD requests that the effective date be moved to the beginning of the next quarter (July 1). This will give the TUD time to prepare for monitoring and operating under the new WDRs, including adjustments to its SCADA system to record and output the necessary parameters (i.e., averages, minimums, etc.)

**RESPONSE:** As stated in a previous response, staff will change the effective date of the MRP to 1 June 2024.

**TUD – Comment #27:** TUD requests being allowed to collect the 24-hour composite samples using time-based compositing. This is because the Extended Aeration Activated Sludge (EAAS) basins are operated in a way to help minimize diurnal flow variations. The samplers are not currently connected to electrical signals from the flow meters. Requested edits are shown in the attachment.

**RESPONSE:** Staff have made the edits as requested.

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## JSD COMMENTS

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**JSD – Comment #1:** JSD requests changes to Finding 20 to acknowledge that the discharge from the JSD WWTF occurs in accordance with the agreement between TUD and the JSD.

**RESPONSE:** Staff revised Finding 18 (previously Finding 20) to the following:

*Jamestown Sanitary District (JSD) owns and operates a WWTF (JSD WWTF) permitted under WDRs Order R5 2021 0046, which allows discharges up to 0.23 mgd ADWF of disinfected secondary effluent to TUD's Reclamation System. Discharge to TUD's Reclamation System occurs under the Agreement between Jamestown Sanitary District and Tuolumne Utilities District Transfer in Connection with Wastewater Treatment Facilities Improvements Project No. C 06-8000-210 (JSD-TUD Agreement). The JSD WWTF was recently upgraded so that it could treat flows of up to 0.144 mgd to disinfected tertiary standards.*

**JSD – Comment #2:** JSD requests that Finding 53 is updated to reflect that JSD WWTF produces disinfected secondary-23 recycled water and that in order to comply with the agreement between TUD and JSD, JSD is determining how to upgrade the JSD WWTF to treat all effluent to disinfected tertiary standards.

**RESPONSE:** Staff made the requested changes to Finding 50 (previously Finding 53).

**JSD – Comment #3:** JSD requests that the information sheet is changed to reflect that the effluent from JSD flows by gravity and is not pumped to Quartz Reservoir.



**RESPONSE:** Staff fixed the error in the information sheet so that it correctly reflects that effluent from JSD WWTF is discharged to Quartz Reservoir using a gravity flow line.