

**Response to Comments
and Changes Made to Public Review Draft
U. S. Coast Guard Wastewater Treatment and Reclamation Facility
WDID No. 1B72033OSON
Waste Discharge Requirements Order No. R1-2012-0033**

U.S. Coast Guard sent a comment letter dated March 8, 2012 with comments on the draft CDO (Order No. R1-2012-0032) and draft WDRs (Order No. R1-2012-0033). The cover letter requested the possibility of addressing the Board at the public hearing on April 26, 2012. In the following summary of Discharger comments and Regional Water Board staff responses, proposed additions to permit language are identified with underline and proposed deletions are identified with strikeout text.

Following the Response to Comments made by the Discharger is a summary of additional changes made to the public review draft of the Order by Regional Water Board Staff.

Comment 1. The Discharger is concerned that the draft Order lists more than just the average dry weather flow as design and permitted flows and requests removal of the average wet weather flow and peak wet weather flow from the draft Order. The comment identifies the fact that the Facility upgrade is designed based on the average daily flow for organics loading and peak wet weather flow for hydraulic loading. The Discharger requests removal of the AWWF and PWWF to avoid misinterpretation.

Response: Regional Water Board permits typically include average daily dry weather flow to address the organic treatment capacity and peak wet weather flow to address the hydraulic capacity of a wastewater treatment facility. These are the two flows that must be identified as compliance flows within the draft Order (Prohibitions I and J). References to the AWWF and average daily flow have been removed from the draft Order.

Table 3 and Discharge Prohibition III.J of the Order and Section I.D of the Fact Sheet (Attachment D) have been modified in response to this comment as follows:

Table 3. Facility Information

Facility Design and Permitted Flows¹	<p>Existing Facility: Average Dry Weather Flow (ADWF) = 0.18 million gallons per day (mgd)</p> <p>Upgraded Facility: Average Dry Weather Flow (ADWF) = 0.197 million gallons per day (mgd) Average Daily Flow (ADF) = 0.225 mgd Average Wet Weather Flow Treatment Capacity (AWWF) = 0.254 mgd Peak Wet Weather Flow Treatment Capacity (PWWF) = 3.036 mgd</p>
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Discharge Prohibition III.J is modified as follows: “After completion and certification of the Discharger’s Facility upgrade project, the ADWF of waste through the Discharger’s Facility in excess of 0.122 mgd (as determined from the lowest 30-day ~~mean~~ average

¹ See Prohibitions III.I and J for details regarding permitted flows.

daily flow), and the average wet weather flow (AWWF) of waste in excess of 0.178 mgd is prohibited, until such time that the Discharger demonstrates that it has treatment and reclamation capacity to handle higher ADWF and AWWF, not to exceed 0.197 mgd and 0.254 mgd, respectively. The peak wet weather flow (PWWF) of waste shall not exceed 3.036 mgd.

Section I.D of the Fact Sheet, second paragraph is modified to include the following three sentences: “The new secondary treatment process units are designed to treat an average dry weather flow of 0.197 mgd and a sustained flow of 625 gallons per minute (0.9 mgd) for a duration of a month. The influent pumps will be set at 0.9 mgd to ensure that the peak treatment capacity is never exceeded and excess influent flows will be directed to the flow equalization basin which will allow the facility to handle a peak wet weather flow of 3.036 mgd. This is the flow that is identified as the peak wet weather flow in Table 3 and Discharge Prohibition III.J of the Order.”

Comment 2. Discharge Prohibition III.I contains language regarding compliance with the average dry weather flow limit that is unclear. The Discharger requests clarification regarding the language in Discharge Prohibition III.I.

Response: Although the language in the permit may imply that there only needs to be one 30-day period when the average flow is less than the design average dry weather flow, this is not the intent of the permit language. In order for the Facility to be in compliance with the permit it must demonstrate that it is operating below the design flow capacities. The ADWF limitations expressed in Discharger Prohibitions III.I and III.J will be evaluated once each calendar year. If the Facility reaches a point where it is operating at or above the ADWF, the Facility would be considered to be at capacity. Standard Provision X.A.13 of the draft Order requires the Discharger to notify the Board if the Facility is expected to reach capacity within a four year period. Standard Provision X.A.13 of the draft Order states “Factors to be evaluated in assessing reserve capacity shall include, at a minimum, (1) comparison of the wet weather design flow with the highest daily flow, and (2) comparison of the average dry weather design flow with the lowest 30-day flow.” If Regional Water Board staff identify evidence that the Facility is reaching capacity before the Discharger provides notification, Regional Water Board staff will notify the Discharger that it must comply with Standard Provision X.A.13 which requires submittal of a technical report showing how flow volumes will be prevented from exceeding capacity, or how capacity will be increased. The technical report will be required within 120 days after the Discharger provides notification to the Regional Water Board, or within 120 days after receipt of Regional Water Board notification.

Regional Water Board staff identified a discrepancy in the permit language in Discharger Prohibitions III.I and III.J. ADWF is defined in terms of a 30-day average, but the compliance language in the draft Order stated that the Discharger must average flows over each calendar month. The language referring to the need to average over a calendar month has been removed from the last sentence of each of these Prohibitions,

as follows: “Compliance with ~~this~~ these flow prohibitions shall be measured continuously at Monitoring Location EFF-001, and calculated daily, ~~and averaged over a calendar month.~~”

Comment 3. Discharge Prohibition III.J includes a flow limitation based on average wet-weather flow which is not defined anywhere in the permit nor is it an important treatment capacity parameter. The Discharger suggests that this prohibition be based on ADWF only, or to use average daily flow (ADF) in place of AWWF. See also Comment 1.

Response: See response to Comment 1.

Comment 4. The Discharger requests clarification for the inclusion of a settleable solids effluent limitation for the activated sludge treatment plant.

Response: Settleable solids effluent limitations are not necessary for a mechanical treatment plant, therefore the settleable solids effluent limitations have been removed from Table 4 in Section IV.A.1 of the draft Order.

Comment 5. The Discharger believes that the definition of pond freeboard conflicts with accepted engineering practice by requiring two feet of freeboard from the maximum surface elevation to the lowest point of overflow rather than to the top of the berms. The Discharger states that the storage pond design is in compliance with Reclamation Provision VII.B.9.j which requires that reservoirs and ponds be designed to provide adequate protection against overflow, structural damage, or a reduction in efficiency resulting from a 25-year, 24-hour storm or flood event or greater.

Response: Discharge Prohibition V.B. of the draft Order has been modified to reflect the treatment plant design as follows: “**B. Pond Freeboard.** Freeboard in wastewater treatment or storage ponds shall never be less than two feet as measured vertically from the water surface to the top of the berms.~~lowest point of overflow.~~”

Comment 6: The requirement to demonstrate a chlorine residual of 1.5 mg/L at the end of the disinfection process seems redundant, unnecessary, and costly. This requirement will require a larger chemical dose than is necessary to meet disinfection requirements, increasing operational costs without any additional benefit. If the end goal of the disinfection system is to meet final effluent limitations for total coliform organisms, then the chlorine residual requirement should not be needed.

Response: Regional Water Board staff reviewed Title 22 requirements and discussed the requirements with California Department of Public Health staff and determined that the chlorine residual requirement is not necessary and that the weekly coliform monitoring requirement is an adequate means to ensure compliance with Title 22 requirements for fodder crop irrigation. Therefore, the draft Order has been revised to

remove the requirement in Reclamation Specification VI.B to demonstrate a chlorine residual of 1.5 mg/L at the end of the disinfection process, as follows ~~“a. A minimum chlorine residual of 1.5 mg/L shall be maintained at the end of the chlorine disinfection process at Monitoring Location EFF-001.” and “b. In the event of a chlorination system failure, or whenever a chlorine residual of 1.5 mg/L or greater is not achieved, the Discharger shall cease transfers of inadequately disinfected effluent to storage. ...”~~

The requirement for continuous chlorine residual monitoring has been retained in Table C-3 and a footnote has been added to clarify the need to report the lowest daily residual as follows, “.² Report lowest daily chlorine residual.”

Comment 7: The Discharger requests removal of the requirement in Provision X.B.2.c to perform an industrial waste survey because there are no industrial processes that discharge to the collection system.

Response: Source control language is included in the draft Order due to incidents that occurred in recent years that resulted in the discharge of toxic pollutants to the treatment system. Examples include the accidental discharge of diesel that escaped into the collection system from an excavation related to a subsurface cleanup of diesel and the inadvertent discharge of septage that contained a petroleum-based solvent that was used to clean the collection system from the Coast Guard housing facility in Point Reyes.

Since the TRACEN facility is small and does not have any industrial processes, the waste survey language in General Provision X.B.2.c.iii is proposed for removal from the draft Order, as follows: ~~“iii. Conduct an industrial waste survey to identify all dischargers that might discharge pollutants that could pass through or interfere with the operation or performance of the Facility. This survey shall be conducted during the first year of the term of this Order. Survey results shall be summarized in a written report and submitted with the Discharger’s annual report due on March 1, 2014.”~~

The waste hauler permit system requirement identified in Provision X.B.2.c.ii will be used to ensure that septage loads do not contain pollutants that should not be discharged to the treatment plant. The source control inspection and monitoring language in General Provision X.B.2.c.iv (formerly X.B.2.c.v) has been modified to clarify the types of activities at the Coast Guard base that shall be inspected and monitored as necessary. The language has been modified as follows: “Perform ongoing inspections and monitoring of activities at the TRACEN facility that could result in discharges of toxic pollutants, as necessary, to ensure adequate source control. Examples of activities that shall be inspected and monitored include, but are not limited to automotive and machine shops, galley grease traps, and any future soil or groundwater cleanups.”

Provision X.B.2.c.vi is also proposed for removal from the draft Order as follows:

~~v. National Pretreatment Standards, prohibited discharges:~~

- ~~(a). **General Prohibitions.** Pollutants introduced into WWTFs by a non-domestic source shall not pass through [40 CFR 403.3(n)] the WWTF or interfere [40 CFR 403.3(i)] with the operation or performance of the WWTF. These general prohibitions and the specific prohibitions in paragraph (b) of this provision apply to all non-domestic sources introducing pollutants into a WWTF whether or not the source is subject to other National Pretreatment Standards or any national, state, or local pretreatment requirements.~~
- ~~(b). **Specific prohibitions.** In addition, the following pollutants shall not be introduced into a WWTF:~~
- ~~(i) — Pollutants that create a fire or explosion hazard in the WWTF;~~
 - ~~(ii) — Pollutants that will cause corrosive structural damage to the WWTF, but in no case discharges with pH lower than 5.0, unless the WWTF is specifically designed to accommodate such discharges;~~
 - ~~(iii) — Solid or viscous pollutants in amounts that will cause obstruction to the flow in the WWTF resulting in interference;~~
 - ~~(iv) — Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a discharge at a flow rate and/or pollutant concentration that will cause interference with the WWTF;~~
 - ~~(v) — Heat in amounts which will inhibit biological activity in the WWTF resulting in interference, but in no case heat in such quantities that the temperature at the WWTF exceeds 40°C (104°F) unless the Regional Water Board, upon request of the WWTF, approves alternate temperature units;~~
 - ~~(vi) — Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass-through;~~
 - ~~(vii) — Pollutants that result in the presence of toxic gases, vapors, or fumes within the WWTF in a quantity that may cause acute worker health and safety problems; or~~
 - ~~(viii) — Any trucked or hauled pollutant, except at discharge points designated by the WWTF.~~

This language identified prohibited discharges as identified in the National Pretreatment Standards. Since there are no industrial processes at the TRACEN facility that would be subject to the National Pretreatment Standards, this language is unnecessary.

Section V.B.1.g of the Monitoring and Reporting Program has been modified to clarify the source control activities that must be reported in the Annual Report as follows:

- g. **Source Control Activity Reporting.** The Discharger shall submit a description of the Discharger's source control activities performed during the calendar year, as required by Provision X.B.2.c in the Order, including; ~~but not limited to inspection of facilities that may contribute pollutants that shouldn't be discharged to the wastewater treatment facility and public education efforts.~~
- i. A copy of any source control standards.
 - ii. A summary of any inspections or monitoring conducted during the previous year of TRACEN departments or activities that may contribute pollutants that should not be discharged to the wastewater treatment facility.
 - iii. A summary of public education and public participation activities to involve and inform the TRACEN population regarding pollutants that should not be discharged to the wastewater treatment facility.

Comment 8: The Discharger requests that the requirement in section X.B.3.a to perform agricultural use sampling either be removed or modified to identify the list of toxic substances to be sampled. The Discharger states that they are not aware of any historical use of agricultural chemicals in the agricultural use areas. If this sampling requirement is retained in the permit, the Discharger requests that the Order list the toxic substances that should be sampled and that the date for submittal of the sampling plan be changed to provide additional time for the submittal, because requiring the report 90 days in advance of construction of the treatment plant may put them in non-compliance due to the fact that construction may begin shortly after permit adoption. The submittal date should be set so that sampling occurs prior to construction or grading within the agricultural use areas.

Response: The requirement for agricultural use sampling is included in the permit because it was identified as a mitigation measure in the CEQA document prepared for the treatment plant upgrade project. The Department of Toxic Substances Control (DTSC) provided comments on the CEQA document stating their strong recommendation for an evaluation of past agricultural practices to determine if agricultural chemicals were used at the project site and, if agricultural chemicals were used recommended soil sampling to be conducted to determine if there has been a release of a hazardous substance to soils. The US Coast Guard's CEQA document

was amended in response to this comment and the US Coast Guard committed to conducting soil sampling prior to construction in project areas with a possible history of agricultural use to determine if hazardous substances are present and to develop a soil cleanup plan in coordination with the Regional Board and DTSC if soil sampling reveals the presence of hazardous substances.

In response to the Discharger's concern that the timing of the sampling requirement (90 days prior to the start of project construction) is awkward because project construction may begin shortly after permit adoption, the draft Order has been modified to require submittal of the sampling plan as soon as possible, but no later than 30 days from the adoption date of the Order. The draft Order has also been modified to require that soil sampling occur in advance of soil grading work in agricultural areas and, if soil sampling reveals evidence of release of toxic chemicals, that project grading shall not commence until all DTSC requirements are satisfied. The modified permit language in section X.B.3 of the Order is as follows:

“a. Agricultural Use Area Sampling

- i. The Discharger shall prepare and submit, for approval by the Regional Water Board Executive Officer and Department of Toxic Substances Control (DTSC), a sampling plan describing the Discharger's plan and schedule for sampling soils prior to construction in project areas with a history of agricultural chemical use to determine if hazardous substances are present. The sampling plan shall be submitted to the Regional Water Board and DTSC as soon as possible, but no later than 30 days from the adoption date of this Order.~~at least 90 days prior to the start of project construction.~~
- ii. The Discharger shall complete soil sampling in advance of any soil grading work in agricultural use areas. If soil sampling reveals evidence of release of toxic chemicals, project grading shall not commence until all DTSC requirements are satisfied.
- iii. The Discharger shall submit to the Regional Water Board Executive Officer and DTSC, a written report with ~~soil sampling results and~~ an analysis of the soil sampling results within 90 days of completing soil sampling. If soil sampling reveals the presence of hazardous substances, the written report shall include a soil cleanup plan, developed in coordination with the DTSC and the Regional Water Board and in accordance with state laws and regulations. The soil cleanup plan shall address plans for excavation, removal, and disposal of contaminated soils off-site to an approved disposal facility. ...”

Regional Water Board staff will work with DTSC staff to provide approval of the sampling plan as quickly as possible to accommodate the project construction schedule. Regional Water Board staff recommend that the Discharger begin preparation of the sampling plan in advance of the permit adoption to ensure that the sampling work does not delay the project construction schedule. Since this requirement is in response to DTSC's request, the Discharger should work with staff at DTSC to identify the toxic substances that should be sampled by contacting Allan Fone at DTSC at afone@dtsc.ca.gov or (510) 540-3836.

Comment 9: Table C-1 in the Monitoring and Reporting Program specifies groundwater monitoring well names that are not familiar to the Discharger. Given that most of the existing groundwater wells will be demolished as part of the construction and eight new monitoring wells will be developed, the Discharger requests the opportunity to work with the Regional Water Board to identify which new monitoring wells will be part of the long term MRP and which can be sampled as part of the project schedule.

Response: The groundwater monitoring requirement was developed based on information provided in the ROWD that indicated that the upgradient groundwater monitoring wells would be retained. This is the first that Regional Board staff has been notified that all existing wells will be demolished and that new wells will be constructed. In order to accommodate the Discharger's request to work with the Regional Water Board to identify which new monitoring wells will be part of the long term monitoring and reporting program, the requirement to submit a sampling workplan has been moved from the MRP to Section X.B.3.b of the Order and modified to allow the Discharger to provide the details of the workplan as follows:

"b. Groundwater Monitoring Plan

- i. The Discharger shall submit a work plan within 30 days of the adoption date of this Order for concurrence by the Regional Water Board Executive Officer, to determine the impacts on groundwater from each storage pond, including groundwater gradient direction. The work plan shall describe the steps the Discharger intends to follow to site, construct, develop, and sample new monitoring wells for compliance with groundwater monitoring requirements in Attachment C, section IV.A, Table C-9. The work plan shall include the following:
 - (a) Proposed location(s) of upgradient monitoring well(s) that will be unaffected by the discharge from the Facility, which is in the same formation as the proposed downgradient monitoring wells.
 - (b) Proposed locations to construct groundwater monitoring wells downgradient of each pond.

- (c) Proposed well construction techniques, including screening intervals.
 - (d) Surveyed elevations and locations of the proposed wells to the nearest 0.01 foot and 0.1 foot, respectively.
 - (e) Proposed time schedule for construction of new groundwater monitoring wells and implementation of monitoring new groundwater monitoring wells in place of existing groundwater monitoring wells.
- ii. Implementation – Upon concurrence by the Regional Water Board Executive Officer, the Discharger shall construct the new groundwater monitoring wells identified in the groundwater monitoring workplan.
 - iii. Well Construction Report - The Discharger shall submit a well construction report within 60 days of completing well construction and initial monitoring of the new groundwater monitoring wells. The report shall include monitoring well boring logs, well construction diagrams, well casing and water level elevations, a water level contour map, and sampling and analysis data. The report shall also include a plan for disposal of wastes generated during well construction, development and monitoring activities. Pursuant to Water Code section 13260 and California Code of Regulations Title 27, which regulate land disposal activities, the Regional Water Board requires proof that storage and disposal of non-hazardous waste or inert materials (which may include discarded product or recycled material) will not result in degradation of water quality, human health, or the environment.”

This modified requirement will provide the Discharger an opportunity to submit a specific plan for construction of new groundwater monitoring wells. The MRP, section IV.A has been modified to remove the well installation work plan requirement as follows:

- ~~1. A well installation workplan shall be submitted in a timely manner to allow for construction of two new downgradient monitoring wells in time for monitoring to commence before preconstruction grading begins.~~
- ~~2. Upon completion of the new monitoring well construction, The Discharger shall submit a letter confirming completion of installation in accordance with the well installation workplan.~~

Section IV.A of the MRP has also been modified with regard to the groundwater monitoring requirement to remove specific reference to existing and new wells since the

same groundwater monitoring requirement will apply for existing and new monitoring wells, as follows: “~~3.1. The Discharger shall monitor its existing upgradient groundwater at approved groundwater monitoring well locations (MW-1) and two new downgradient groundwater monitoring wells (MW-2 and MW-3) as follows:~~”

Comment 10: The Discharger requests modification of the compliance point for monitoring of the effluent flow. The flow meter is planned upstream of the chlorine contact basin for use in flow proportional chlorine dosing.

Response: This is a reasonable request that will provide the effluent flow monitoring data that is needed by Regional Water Board staff to assess compliance with permit conditions while allowing the Discharger to meet its need for chlorine dosing. A footnote has been added to Table C-3 in Monitoring Requirement III.B of the MRP as follows: “¹ Flow monitoring may occur immediately upstream of the chlorine contact basin.”

Comment 11: The Discharger requests that the priority pollutant monitoring requirement be removed for discharges to the agricultural irrigation fields (Discharge Point 003/Monitoring Location REC-003) because the Recycled Water Policy only requires priority pollutant monitoring for recycled water discharged to landscape irrigation areas (e.g., urban reclamation).

Response: Footnote 3 in Table C-7 states that the priority pollutant monitoring requirement only applies at REC-004 (landscape irrigation) in accordance with the requirements of the Recycled Water Policy, therefore the MRP already addresses the Discharger’s concern.

No changes were made to the draft Order in response to this comment.

Comment 12: Monitoring and Reporting Program, Section IV.A requires groundwater monitoring, but the timeline and requirements proposed present a conflict with the planned construction phasing. In addition, monitoring well nomenclature is unclear. The Discharger would like this MRP section to be modified to require existing upgradient and downgradient monitoring wells to remain in place for monitoring during construction of Pond B and new upgradient and downgradient monitoring wells for Pond B to be monitored during Pond A construction.

Response: See response to Comment 9 above.

Additional Changes Made to WDR by Regional Water Board Staff

1. Finding II.C of the draft permit includes a CEQA finding that included language stating that the Regional Water Board is adopting the CEQA document for this project. After the public review draft of the permit was released, Regional Water

Board staff realized that the CEQA document must be adopted by the Regional Water Board before the permit is adopted. Therefore, pertinent language from Finding II.C of the draft Order has been removed and placed in a separate resolution (Resolution No. R1-2012-0052) to allow the Regional Water Board to adopt the CEQA document before it adopts the permit. Finding II.C of the draft Order has been modified as follows:

“A. California Environmental Quality Act (CEQA). The Regional Water Board is the lead agency under the California Environmental Quality Act (CEQA), in connection with the proceeding to consider issuing waste discharge requirements for discharges to land. (Pub. Resources Code, §§ 21000-21177.) ~~When a project requires compliance with both CEQA and NEPA, and the federal document is prepared first, the state agency should use the federal document rather than preparing its own. (Cal. Code of Regs., tit. 14, §15221.) Consistent with this policy, †~~The U.S. Coast Guard prepared an Environmental Assessment-Initial Study/Mitigated Negative Declaration (EA-IS/MND) for this project in order to meet federal requirements pursuant to the National Environmental Protection Act (NEPA) and state requirements pursuant to CEQA. The EA-IS/MND evaluated the environmental impacts to groundwater and surface water quality associated with the construction and use of its proposed wastewater treatment, storage and reclamation facilities. The EA-IS/MND addresses cumulative and growth-inducing impacts, and identified mitigation measures to be implemented to ensure that project impacts are less than significant. Mitigation measures necessary to reduce or eliminate significant impacts on the environment are included as enforceable conditions of approval in this Order. The Regional Water Board adopted Resolution No. R1-2012-0052, approving the EA-IS and adopting the MND prepared by the U.S. Coast Guard. ~~On April 15, 2008, the EA-IS/MND was sent to the State Clearinghouse (SCH No. 2008 044001). On January 25-27, 2009, the Regional Water Board’s notice of intent to adopt the EA-IS/MND was published in a newspaper of general circulation and sent to all persons known to be interested in the wastewater treatment facility upgrade project. The mitigated negative declaration reflects the Regional Water Board’s independent judgment and analysis. After considering the document and comments received during the public review process, the Regional Water Board hereby determines that the proposed project, with mitigation measures, will not have a significant effect on the environment. The mitigated negative declaration is hereby adopted. The documents or other material, which constitute the record, are located at in the Regional Water Board files for this Discharger. The Regional Water Board will file a Notice of Determination within five days from the issuance of this Order.”~~