Mendocino County Water Works District No. 2

The Mendocino County Water Works District No. 2 (hereinafter Discharger or District) submitted comments on the draft NPDES permit (Order No. R1-2010-0038) on April 21, 2010. The comments requested minor changes to certain provisions of the draft Order. Minor changes resulting from the Discharger's requests have been incorporated in the revised draft Order. The following are staff responses to comments from the Discharger:

Comment 1: Identification of Discharge Location. The Discharge Location/Point numbers are reversed compared to the previous/current permit. Therefore the Mendocino County Waterworks District #2 would like to request that this specification be changed to read the same as previous permits to prevent confusion among our records and employees. We would like the Permit to read Discharge Point 001 to represent the Forest Irrigation System and the Discharge Point 002 to represent the Pacific Ocean.

> **Staff Response:** Beginning in 2006, new and renewed NPDES permits are formatted using a statewide permit template to promote consistency in NPDES permits throughout the state. In accordance with the template format, the numbering of the discharge points begins with surface water monitoring points (the NPDES-regulated discharge) followed by land disposal and water recycling locations. The permit for the Anchor Bay WWTF is the last remaining NPDES permit in the north coast region where Discharge Point 001 corresponds to a discharge to land and Discharge Point 002 corresponds to the NPDES discharge. Changing the identification numbers of the discharge points would bring the Anchor Bay permit in line with the other NPDES permits in the region. Staff regrets the inconvenience that this change may cause the Discharger.

Comment 2: Influent Monitoring Requirement. The Influent Monitoring Requirements on page E-3 should specify that monitoring take place only when discharging to the Ocean, sampling the influent is used to rationalize and determine the percent removal of BOD and TSS as per our current permit.

> **Staff Response:** The draft Order has been revised to require influent monitoring only when discharging to the ocean.

Comment 3: Monitoring Requirements for Land Disposal Discharge (Discharge Point 002). We would like you to reconsider the necessity of the Effluent Monitoring requirements on page F-32 for additional samples to be taken and analyzed for ammonia, nitrate, total dissolved solids, sodium, chloride and aluminum when discharging to the Forest Irrigation. It is my understanding that this additional testing per the Basin Plan be in place to protect from groundwater pollutants. There are no nearby bodies of water or streams that flow year round that may harbor animal or marine life in the proximity of the Forest Irrigation. I have also spoken with the Gualala Water Company to determine that there are no existing drinking water wells nor the possible addition of that they were aware of in this area either. Therefore there is no real potential for contamination of any sort in this area.

> **Staff Response:** The State Board's "Sources of Drinking Water" Policy (Resolution 88-63) designates the municipal or domestic water supply (MUN) beneficial use for all surface and ground waters except for those: 1) with total dissolved solids exceeding 3,000 mg/L, 2) with

contamination that cannot reasonably be treated for domestic use, 3) where there is insufficient water supply, 4) in systems designed for wastewater collection or conveying or holding agricultural drainage, or 5) regulated as a geothermal energy producing source. The Basin Plan requires that groundwaters with the MUN beneficial use designation not exceed Maximum Concentration Levels (MCLs) of certain inorganic and organic chemical constituents specified in title 22 of the California Code of Regulations.

Regional Water Board staff has determined that because the sources of the District's wastewater are non-industrial and the forest irrigation discharge is primarily a means of wastewater disposal; that is, the wastewater application rate is based on field capacity rather than the rate of water and nutrient uptake through evapotranspiration, there may be a reasonable potential that the discharge could exceed groundwater MCLs for nitrate, aluminum, total dissolved solids (TDS), and sodium. Accordingly, the draft Order establishes effluent monitoring requirements for nitrate, aluminum, TDS, and sodium to assess compliance with the applicable MCLs and to provide effluent data for use in a reasonable potential analysis for these constituents. The proximity of the irrigation discharge to streams or other surface water bodies is not relevant to the assessment of compliance with water quality objectives for groundwater.

Comment 4: Reporting Schedules. I am not commenting on the following just mentioning that I am a little confused by the Reporting Schedules and various Monitoring Requirements other than the weekly/monthly usual samples (for example the Biological Survey). I was hoping that you had available a list or summary of your requirements vs. a time line upon the permit renewal so that we are all under a better and simpler understanding of what you expect to receive from us.

Staff Response: Table E-8 was inadvertently left incomplete in the draft permit, so your confusion is understandable. Table E-8 has been completed in the revised draft and clarifies due dates for routine monitoring reports and other special reports.