

Changes Made To Proposed Order by Regional Water Board Staff

Regional Water Board staff made the following additional changes to the proposed Order No. R1-2010-0034, Waste Discharge Requirements and Master Reclamation Permit for the City of Healdsburg Wastewater Treatment, Reclamation and Disposal Facility. The need for these changes was identified during staff's review of the proposed Order while responding to public comments.

1. Changed language referring to Basalt Pond from "Basalt Pond, tributary to the Russian River" to "Basalt Pond, part of the Russian River" in two permit locations. Table 2 on page 1 and Table F-1. Finding II.B establishes the evidence that Basalt Pond is part of the Russian River and all other references to Basalt Pond already say "part of the Russian River".
2. Changed language referring to new lined storage pond from "25 million gallon treated effluent storage pond" to "25 million gallon recycled water storage pond." Both of these terms are used in the permit, but the later term more accurately describes the purpose of the pond, thus all references have been changed for consistency and clarity, including Table 2 on page 1, and Fact Sheet sections II.A (6th and 8th paragraphs), IV.G.3, and IV.G.3.d.
3. Modified section headings and table headings in permit section IV. Effluent Limitations and Discharge Specifications to include a description of each discharge point. Section IV.A and Table 6 headings were modified to include the words "Discharge to Basalt Pond". Section IV. Heading was modified to include the words "(Recycled Water Storage Pond) and Discharge Point 003". Table 7 heading was modified to include the words "Discharge Point 002 – Discharge to Recycled Water Storage Pond".
4. Permit Section IV.D.3 language regarding Reclamation Specifications for storage ponds has been modified to make it clear that a technical report will need to be submitted prior to construction or use of any new wastewater storage ponds and that the technical report must include a technical evaluation that demonstrates that the pond design complies with the Water Code and title 27 of the California Code of Regulations.
5. Permit Provision VI.A.2.b has been modified to include the words "notify Regional Water Board staff within 24 hours and ..." to add clarity to the paragraph and make it consistent with non-compliance reporting language in Section V.E (Twenty-Four Hour Reporting) of Attachment D.
6. Permit Provision VI.C.2.c has been modified to include the words, "treated disinfected effluent" to clarify that the reference receiving water study will need to include monitoring of Basalt Pond, another nearby abandoned gravel extraction pond, **and effluent**.
7. Table E-1 of Attachment E (Monitoring and Reporting Program or MRP) has been modified to include required Minimum Levels for lead and zinc. These two constituents were inadvertently left out of Table E-1 in the public review

draft of the permit, but the requirement to monitor for them was included in the public review draft.

8. Footnote 6 to Table E-4 of the MRP has been modified to include lead and zinc. These two constituents were inadvertently left out of the footnote in the public review draft of the permit, but the requirement to monitor them was included in Table E-4 of the public review draft.
9. Table E-6 of Reclamation Monitoring Requirements VII.A.1 has been modified to include corrected Minimum Sampling Frequencies for Biochemical Oxygen Demand, Total Suspended Solids, Total Coliform Bacteria, and pH. The public review draft incorrectly showed a monthly monitoring frequency for these four parameters. The minimum sampling frequency has been changed to weekly for BOD, TSS, and pH and daily for total coliform bacteria. These are the frequencies required by Title 22.

Fact Sheet section VI.E has been modified to be consistent with the change to Table E-6.

10. Table E-8 was modified to include receiving water flow monitoring. Other sections of the proposed permit, specifically Discharge Prohibition III.K and Fact Sheet section IV.A.11, make it clear that receiving water flow monitoring is required, thus this change makes Table E-8 consistent with the rest of the proposed permit.
11. Table F-1, Facility Information has been modified to include the Threat to Water Quality and Complexity ratings for this facility. These ratings were inadvertently left out of the public review draft.
12. Fact Sheet section III.B has been modified to remove a duplicative mitigation measure. Mitigation measures 1 and 7 in the public review draft were almost identical, thus Mitigation Measure 1 was modified to address urban landscape and agricultural recycled water use and Mitigation Measure 7 was deleted.
13. Fact Sheet section IV.C.1 was modified to remove a statement regarding reasonable potential for ammonia. The removed statement is not consistent with other sections of the permit that acknowledge that insufficient data is available to make a determination of reasonable potential for ammonia. The Proposed Permit includes a special study requirement for the Discharger to collect additional data so that a reasonable potential determination may be made.
14. Fact Sheet section IV.G.3 (Chemical Constituents) has been modified to include an explanation of the need for monitoring Title 22 inorganic and organic constituents.
15. The second sentence in Fact Sheet section IV.G.4 (WQBEL Calculations) has been modified to read as follows: "All of the reclamation specifications are based on the technical capabilities of the advanced wastewater treatment

- system and levels required by ~~40 CFR Part 133~~ the Basin Plan and title 22, thus no calculations were needed to determine the WQBELs.” This change correctly identifies where the reclamation specification in the permit come from.
16. Finding 2 of Attachment G has been modified to include an additional statement from the Recycled Water Policy that says, “In accordance with the Recycled Water Policy, activities involving recycled water use that could impact high quality waters are required to implement best practicable treatment or control of the discharge necessary to ensure that pollution or nuisance will not occur, and the highest water quality consistent with the maximum benefit to the people of the state will be maintained.” This statement helps to clarify the overall goals of the Recycled Water Policy.
 17. Finding 7 of Attachment G has been modified to include a clarifying statement that says, “This Order requires the Discharger to minimize the potential for surface runoff of recycled water, but recognizes that even with diligent implementation of BMPs, incidental runoff events may occur on occasion.”
 18. Water Reclamation Requirement B.1 has been modified to add a clarifying statement as follows, “The use of recycled water shall not result in unreasonable waste of water. Recycled water shall not be applied at greater than hydraulic agronomic rates.”
 19. Water Reclamation Requirement B.4 has been modified as follows, “Best management practices that are protective of groundwater and surface water quality and human health shall be developed and implemented to achieve an safe and efficient irrigation system.” to clarify that the BMPs that are being addressed are those that provide protection of water quality and human health. The term “safe” was too general to capture the intent of this requirement.
 20. Water Reclamation Provision C.5.h.iii. has been modified to include a new section c that reads as follows, “The Irrigation Management Plan shall also recognize the possibility of runoff from recycled water use areas and describe measures, including BMPs the Discharger will implement to minimize the possibility of runoff.”
 21. Water Reclamation Provision C.5.h.iii(g) of the public review draft has been removed. This provision required “identification of consultation(s) with state and local health departments, if necessary. Other permit provisions require preparation and submittal of the recycled water engineering report to the California Department of Public Health, thus this provision was deemed duplicative and unnecessary.