Attachment 1.B.
Staff Changes to Forestville Water District NPDES Permit, Proposed Order No. R1-2011-0016

Page/Section	**Description of and reason for change**	**Specifics of Change** (Strikeout indicates recommended deletions and underline indicates recommended additions to permit language)
Page 2, Table 3	Change adoption, effective, and expiration dates	Adoption date changed from May 5, 2011 to June 23, 2011 Effective date changed from June 30, 2016 to August 1, 2016 ROWD due date changed from October 1, 2015 to November 1, 2015
Page 5, Table 4	Corrections regarding facility design flows. These changes are to correct inconsistencies between Table 4 in the permit and Table F-1 in the Fact Sheet	"0.130 mgd (average daily dry weather ~~treatment capacity~~ flow[1]) 0.58 mgd (~~maximum daily treatment capacity~~ peak weekly wet weather flow [2])" 0.78 mgd (peak daily wet weather flow[3]) Footnotes: "[1] Average daily dry weather ~~treatment capacity~~ design flow is defined as the average of daily inflows calculated during the lowest consecutive 30-day period each calendar year" [2] Peak weekly wet weather design flow is defined as the maximum weekly average flow that may be treated, based on the capacity of the microfilters. [3] ~~Maximum~~ Peak daily wet weather ~~treatment capacity~~ design flow is defined as the ~~highest amount~~ maximum volume of effluent that may be treated, based on the capacity of the microfilters."
Page 6/Section II.B, 2nd paragraph	Correction regarding design flows	"The treatment facility has design treatment capacities of 0.130 mgd (average daily dry weather flow), ~~and~~ 0.58 mgd (~~maximum daily~~ peak weekly wet weather flow), and 0.78 mgd (peak daily wet weather flow).
Page 6/ Section II.B, 3rd paragraph	Added language describing off-site storage pond at Sterling/Iron Horse Vineyards	"…a 14.7 million gallon off-site storage pond located at the Sterling/Iron Horse Vineyards …"
Page 11/	Modified language regarding the	Changed last sentence to read "In addition, this Order contains

Section II.M, 1st paragraph	basis for technology-based requirements to clarify that the more stringent requirements for tertiary treatment and associated effluent limitations for BOD_5 and TSS come from the Basin Plan	effluent limitations for BOD_5 and TSS that are more stringent than the minimum federal technology-based requirements that are necessary to meet water quality standards established in the Basin Plan"
Page 15/ Section IV.A.1.a, Footnote 4	Corrected language regarding flow criteria used to calculate wet-weather design flow	"…(not to exceed a ~~maximum daily treatment capacity~~ peak weekly design flow of 0.58 mgd)."
Page 16, Section IV.A.2.a, Footnote 12	Changed effective date for final chlorine residual effluent limitations. This change is associated with changing the adoption date from May 5, 2011 to June 23, 2011	"Final effluent limitations for total chorine residual become effective on ~~April 30, 2016~~ August 1, 2016."
Page 16/ Section IV.A.3.a	Changed final effective date for interim effluent limitations for chlorine residual. This change is associated with changing the adoption date from May 5, 2011 to June 23, 2011.	"Beginning on the effective date of this Order and ending ~~April 30, 2016~~ July 31, 2016, the Discharger shall maintain compliance with an interim effluent limitation for chlorine residual of 0.1 mg/L …"
Page 17/ Section IV.C.1.a	Deleted words that are duplicative of Section IV.C.1.b	Delete the words " … ~~and the specific requirements contained in Attachment G to this Order~~".
Page 18/ Section IV.D.2	Minor modifications to eliminate redundancy	"a. When discharging to the recycled water system or ~~Jones Creek~~ … c. When discharging to Jones Creek ~~and~~ when the filter effluent flow is less than 0.58 mgd …"
Page 30/ Section VI.C.5.c.v	Corrected Order No. for statewide biosolids permit	Change Order No. from ~~2000-10-DWQ~~ to 2004-12-DWQ.
Page 32/ Section VI.7	Changed compliance dates for tasks associated with final effluent limitations for chlorine residual. These date changes are associated with changing the	Task 1 date changed from May 1, 2012 to August 1, 2012 Task 2 date changed from May 1, 2013 to August 1, 2013 Task 3 date changed from April 30, 2016 to July 31, 2016

	adoption date from May 5, 2011 to June 23, 2011.	
Footnotes in Tables 6, 7, and 8	Some footnote references were modified as needed for consistency	See strikeout/underline version of draft permit
Attachment E – Monitoring and Reporting Program		
Page E-6/ Section V.A.1	Incorrect table reference	Change table reference from ~~Table E-4~~ to Table E-6
Page E-6/ Section IV.C, Table E-6, Footnote 17	Correction to section reference	"Monitoring for ammonia shall be concurrent with whole effluent toxicity monitoring (Section V.A.~~1~~ of this MRP)…"
Page E-8, Section V.B.1	Incorrect table reference	Change table reference from ~~Table E-4~~ to Table E-6
Page E-14/ Section VIII.A, Table E-9	Add monitoring requirements for copper and cyanide in the upstream receiving water during periods of discharge	Cyanide[26]; ug/L; Grab; Monthly; Standard Methods"
Page E-15/ Section IX.A.1.b	Correction to section reference	"Compliance with the 95th percentile effluent turbidity limitation specified in section ~~IV.D.2~~ IV.D.1.a.i …"
Page E-19/ Section IX.D.1	Remove unnecessary language from paragraph. Reports associated with special studies have their own submittal dates thus the language requiring submittal with SMRs is incorrect.	"~~The Discharger shall submit reports with the first monthly SMR scheduled to be submitted on or immediately following the report due date in compliance with SMR reporting requirements described in subsection X.B.5 above~~."
Page E-20/ Section X.D.2.a i.(d)	Add language acknowledging role of recycled water users in site inspections and violations reporting	"A summary of recycled water use site inspections conducted by the Discharger or recycled water users and identification of recycled water user violations, including: …"
Footnotes in Tables E-4, E-5, E-6, E-7, and E-9	Some footnote references were modified as needed for consistency	See strikeout/underline version of draft permit
Attachment F – Fact Sheet		
Page F-3, Table	Corrections regarding facility	"0.130 mgd (average daily dry weather design flow[1])

F-1	design flows. These changes are to correct inconsistencies between Table 4 in the permit and Table F-1 in the Fact Sheet.	0.58 mgd (peak weekly <u>wet weather</u> design flow[2])" 0.78~~0~~ mgd (peak daily wet weather design flow[3]) Footnotes: "[1] Average <u>daily</u> dry weather design flow is defined as the average of daily inflows calculated during the lowest consecutive 30-day period each calendar year" [2] Peak weekly <u>wet weather</u> design flow is defined as the maximum weekly average flow that may be treated, based on the capacity of the microfilters. [3] Peak daily wet weather design flow is defined as the maximum volume of effluent that may be treated, based on the capacity of the microfilters."
Page F-5/ Section II.A.2, 2nd paragraph	Modify language to include peak daily wet-weather flow and delete average monthly treatment capacity	"The Facility is designed to provide tertiary treatment for up to an average daily dry-weather flow of 0.130 mgd, ~~an average maximum monthly treatment capacity of 0.357 mgd~~, <u>a peak weekly wet weather flow of 0.58 mgd, and a peak daily wet weather flow of 0.78 mgd,</u>."
Page F-6/ Section II.a.2, 7th paragraph	Modify language to acknowledge that the chlorine residual needs were identified through a special study of the chlorine contact chamber	"Chlorinated ~~wastewater~~ <u>effluent</u> then flows into one of two baffled concrete chambers. <u>A chlorine contact tank tracer study conducted in August 2005 demonstrated that the contact time is 105 minutes</u> at the peak ~~daily~~ <u>weekly</u> treatment plant <u>design</u> flow of 0.58 mgd, ~~the demonstrated contact time is 105 minutes, so~~ <u>and</u> that a final chlorine residual of 4.3 mg/L is needed to maintain a contact time of 450 mg-min/L at the peak <u>weekly</u> design flow. <u>The study also demonstrated that when the filter flow exceeds 0.58 mgd, up to the peak daily wet weather design flow of 0.78 mgd, a final chlorine residual of 5.3 mg/L is needed to maintain a contact time of 450 mg-min/L.</u>"
Page F-14/ Section II.D.1, 4th paragraph	Corrected section reference in second to last sentence	"After final copper effluent limitations became effective on October 6, 2009 the discharger had ~~four~~ <u>three</u> violations of the average monthly effluent limitation." "… upstream receiving water hardness as discussed further in

		section ~~IV.C.3.b~~ IV.C.3.g of this Fact Sheet."
Page F-24/ Section IV.A.9	Correction of flow number. The peak daily treatment design flow is 0.78 mgd, not 0.58 mgd.	"The peak daily wet-weather influent flow through the treatment system in excess of ~~0.58~~ 0.78 mgd is prohibited. This prohibition is new and is based on the current daily peak sustained wet-weather capacity of the treatment system of ~~0.58~~ 0.78 mgd…."
Page F-27/ Section IV.B.5	Correct description of flow in last sentence	"During wet-weather periods when the flow rate into the Facility exceeds 0.130 mgd, the mass effluent limitations may be calculated based on the actual daily average flow rate, not to exceed the ~~maximum sustained~~ peak weekly design flow of 0.58 mgd.
Page F-27/ Section IV.B.6, Table F-6, Footnote 31	Correct description of flow	"During wet-weather periods, when the influent flow rate exceeds the dry-weather design flow, mass emission limitations shall be calculated using the concentration-based effluent limitations and the actual daily average influent flow rate (not to exceed ~~a maximum sustained~~ the peak weekly design flow rate of 0.58 mgd.)
Page F-28/ Section IV.C.1, 2nd paragraph	Correct language to be consistent with requirements in MRP	"The monitoring and reporting program establishes ~~weekly~~ monthly monitoring during periods of discharge to surface waters to develop a sufficient data based to determine reasonable potential. ~~The monitoring frequency will be reduced to monthly during periods of discharge once 10 samples have been collected and analyzed.~~"
Page F-31/ Section IV.C.4.b., 2nd paragraph, last sentence	Change effective date for final chlorine effluent limitations. This date change is associated with changing the adoption date from May 5, 2011 to June 23, 2011.	"Beginning ~~May 1, 2016~~ July 31, 2016, the Discharger shall employ a method sensitive to and accurate at the permitted level of 0.01 mg/L."
Page F-35/ Section IV.C.4.e (Concave-Downward Metals)	Correction	"Copper is the only concave-~~upward~~ downward metal that exhibits reasonable potential"
Page F-51/ Section IV.D.3, 3rd paragraph	Added language to clarify the evaluation of CWA 13241 factors	"In addition, the Regional Water Board has considered the factors in Water Code section 13263, including the provisions of Water Code section 13241, in establishing these requirements. Factors set forth in section 13241 must be evaluated for requirements that go beyond what is required by the Clean Water Act."
Page F-51/	Added sentence identifying the	"Section IV. of Attachment F sets forth ….. All effluent limitations

Section IV.D.3, 5th paragraph	sources of effluent limitations for surface water discharges	established for surface water discharges are required by the CWA, Basin Plan or CTR-SIP."
Page F-54/ Section IV.D.3, Table F-14	Modification to identify location of final effluent limitations for copper	Added the words "See Attachment E-1" to the Average Monthly and Maximum Daily columns.
Page F-55/ Section Section IV.E.	Change language to acknowledge interim effluent limitation for chlorine residual	"~~No interim effluent limitations are established in this Order.~~ An interim effluent limitation for chlorine residual of 0.1 mg/L, established in section IV.A.3 of the Order is effective through July 31, 2016."
Page F-64/ Section VI.F	Removed paragraph to be consistent with decision to remove requirement to monitor Jones Creek for priority pollutants	"~~Water quality criteria for CTR priority pollutants are applicable to Jones Creek, and therefore characterization of background conditions is necessary to assess impacts of the discharge. In addition, reasonable potential analyses, conducted in accordance with procedures established by the SIP, require characterization of background levels of the toxic pollutants~~."
Page F-66/ Section VII.A.2.c	Correct section reference	Order Provision ~~VI.A.2.d~~ VI.A.2.c requires the Discharger to file a petition with …"
Page F-71/ Section VIII.B, 2nd paragraph	Add additional information regarding the public comment period	Add sentence as follows "The public comment period was extended to April 1, 2011 by way of revised public notices issued and posted on March 11, 2011."
Footnotes in Tables F-2, F-3, F-4, F-6, F-7,F-11, and F-13	Some footnote references were modified as needed for consistency	See strikeout/underline version of draft permit
Attachment G – Water Reclamation Requirements and Provisions		
Page G-1/ Section A.3.a.i	Modify to identify the fact that there is an exception to Forestville's agronomic use of recycled water	"With the exception of frost protection uses, the proposed irrigation uses will not exceed agronomic rates and will not occur when soils are saturated. …"