

## Response to Written Comments

### Draft Waste Discharge Requirements Order No. R1-2019-0013

### Sonoma County Water Agency and the Geyserville Sanitation Zone Wastewater Treatment Facility

Regional Water Quality Control Board, North Coast Region  
June 20, 2019

#### Comment Letter Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements and Water Reclamation Requirements, Order No. R1-2019-0013 (Draft Order) for Sonoma County Water Agency Owner and Operator of the Geyserville Sanitation Zone Wastewater Treatment Facility (Facility) was April 25, 2019. The Sonoma County Water Agency (Discharger) provided timely comments by submitting a formal comment letter. No other comments were received during the public comment period.

In this document, each comment is first summarized, and then followed by the North Coast Regional Water Quality Control Board (Regional Water Board) staff response that includes any text that is proposed for modification. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The terms “Draft Order” and “Tentative Order” refer to the draft that was sent out for public comment. The term “Proposed Order” refers to the version of the Order that has been modified in response to comments and is being considered for adoption by the Regional Water Board.

#### Sonoma County Water Agency – April 24, 2019 Comment Letter

**Comment 1:** The Discharger requests three changes to Table 2 of the Draft Order. First, to remove the identification of the receiving water from the table; second, to add a new column identifying a ‘Discharge Location’ as ‘Evaporation/Percolation Ponds’; and third, to describe the ‘treated municipal wastewater’ as ‘secondary treated municipal wastewater’. The changes would make the Draft Order consistent with recently adopted Order No. R1-2019-0007 for the Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Plant.

**Response 1:** Table 2 of the Proposed Order has been modified as requested by the Discharger.

**Comment 2:** The Discharger requests a change in the facility contact information in Table 3 from Garrett Walker to ‘Water Agency Coordinator’.

**Response 2:** Table 3 of the Proposed Order has been modified as requested by the Discharger.

**Comment 3:** The Discharger requests the removal of the term ‘monthly’ when used in reference to ADWF in Table 3 and to use the compliance approach consistent with the recently adopted Order No. R1-2019-0007 for the Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Plant.

**Response 3:** Regional Water Board staff has made the requested changes in the Proposed Order to make the language consistent with Order No. R1-2019-0007.

**Comment 4:** The Discharger requests the removal of the Freshwater Replenishment to Surface Waters beneficial use from Findings II.D. on page 4 of the Draft Order.

**Response 4:** The freshwater replenishment (FRSH) is designated as an existing use for the Geyserville Hydrologic Subarea and has not been removed.

**Comment 5:** The Discharger requests several editorial changes to Findings II.G. Antidegradation Policy to eliminate redundant statements and to provide consistent references to permit requirements.

**Response 5:** Regional Water Board staff revised Finding II.G to more clearly identify references to other permit provisions and deleted the last sentence of the finding, as follows:

This Order is consistent with Resolution No. 68-16 because implementation of the Order will result in the application of management measures to treat the discharge of waste that constitutes the best practicable treatment or control of the discharge. This Order contains discharge prohibitions, effluent limitations, receiving water limitations, monitoring requirements, and a requirement for the Discharger to complete a study (~~see condition R. General Provision VIII.R~~) to assess whether discharges are affecting groundwater quality. These provisions will ensure that the discharge does not result in exceedances of water quality standards and is protective of beneficial uses of groundwater and surface waters within the Geyserville Hydrologic Subarea.

This Order does not authorize an increased volume or concentration of waste, or a decreased level of treatment. This Order includes requirements to develop and implement a source control program (General Provision VIII.F) to prevent toxic pollutants from passing through or interfering with the operation of the wastewater treatment system. ~~This Order also includes effluent requirements to ensure that best practicable treatment and control measures are effective and protective of beneficial uses of groundwater and surface waters.~~

**Comment 6:** The Discharger requests removal of the effluent limitation for Settleable Solids and the monitoring requirements for Settleable Solids cited in Table 4 and Table C-3, respectively.

**Response 6:** Regional Water Board staff agrees that total suspended solids is a better indicator of effluent quality than settleable solids and has determined that the measurement of effluent settleable solids is not required for this discharge of secondary treated wastewater. Accordingly, staff has removed the effluent limitations for Settleable Solids and the monitoring requirements for Settleable Solids cited in Table 4 and Table C-3 of the Proposed Order, respectively.

**Comment 7a:** The Discharger requests that the percolation ponds described as community percolation ponds in the Draft Order instead be described as evaporation/percolation ponds.

**Response 7a:** Regional Water Board staff has made the requested changes to the Proposed Order.

**Comment 7b:** The Discharger requests the following modifications to language in General Provision VIII.R on page 15 of the Draft Order:

“In the event ~~that~~ the final report concludes that discharge from the evaporation/percolation ponds discharge is causing or contributing to exceedances of not attaining groundwater limitations, the final report shall include a work plan with a proposed compliance schedule to bring the discharge into compliance with groundwater limitations as soon as practicable.”

**Response 7b:** Regional Water Board staff has made the requested changes in the Proposed Order.

**Comment 8:** The Discharger notes that the Draft Order is missing details on how to determine compliance with average monthly and maximum daily effluent imitations and proposes that the following language be added to Provision IX:

**C. Average Monthly Effluent Limitation (AMEL)**

The arithmetic mean of all samples collected in a calendar month, calculated as the sum of all samples in a calendar month divided by the number of samples. If only one sample is collected in a calendar month, that sample result will constitute the monthly average and daily maximum results for the purpose of determining compliance with effluent limitations.

If the average of daily discharges over a calendar month exceeds the AMEL for a given parameter, this will represent a single violation, though the Discharger will be considered out of compliance for each day of that month for that parameter (e.g., resulting in 31 days

of non-compliance in a 31-day month). If only a single samples is taken during the calendar month and the analytical results for that sample exceeds the AMEL, the Discharger will be considered out of compliance for that calendar month. The Discharger will only be considered out of compliance for days when the discharge occurs. For any one calendar month during which no sample (daily discharge) is taken, no compliance determination can be made for that calendar month.

**D. Maximum Daily Effluent Limitation (MDEL)**

If a discharge (or when applicable, the median determined by subsection A, above, for multiple sample data of a daily discharge) exceeds the MDEL for a given parameter, the Discharger will be considered out of compliance for that parameter for that one day only within the reporting period. For any one day during which no sample is taken, no compliance determination can be made for that day.

**Response 8:** Regional Water Board staff concurs with the addition of the proposed language and has modified General Provision IX of the Proposed Order to be consistent with the recently adopted Order No. R1-2019-0007 for the Airport-Larkfield-Wikiup Sanitation Zone Wastewater Treatment Plant as requested.

**Comment 9a:** The Discharger requests modifications to the description of the 'flow' parameter in Table C-2 and Table C-3. Specifically, to move the daily average and monthly average reporting frequency requirements from the table and instead include them in a new footnote that would replace existing footnote '4' to the tables.

**Response 9a:** Regional Water Board staff concurs with the requested changes and has modified the Proposed Order.

**Comment 9b:** The Discharger notes that effluent monitoring requirements for pH should be included in Table C-3 and was apparently inadvertently left out.

**Response 9b:** Regional Water Board staff has added pH monitoring requirements to Table C-3.

**Comment 9c:** The Discharger requests a change to the Title 22 Pollutants sampling frequency requirement in Table C-3 from annually to once per the permit term at a minimum.

**Response 9c:** Regional Water Board staff has modified the Proposed Order to require annual Title 22 Pollutant sampling. After the third annual sample, the Executive Officer may modify the frequency of sampling based on the results of the special study required by General Provision VIII.R of the Proposed Order. Requiring only one sampling event at a minimum will not provide enough data for the evaluation of the presence/absence and concentrations of the Title 22 Pollutants.

**Comment 10:** The Discharger requests a reduction in the frequency of the submittal of Self-Monitoring Reports from monthly to quarterly as required by Attachment C to the Draft Order.

**Response 10:** Regional Water Board staff concurs with the requested changes and has modified the Proposed Order accordingly.

**Comment 11:** The Discharger requests a modification to language in Attachment C, section IV.B.1.d., to clarify that the Source Control Activity Report can be included as part of the Annual Report as opposed to being submitted annually as an additional separate report.

**Response 11:** Regional Water Board staff has modified the language in Attachment C, section IV.B.1.d., of the Proposed Order, as follows:

d. Source Control Activity Report. The Discharger shall submit a Source Control Activity Report, ~~as per section IV.A.6.c,~~ as part of the annual report to the Regional Water Board for each calendar year. The report shall describe source control activities performed by the Discharger during the calendar year, as required by General Provision VIII.F of the Order, including:

**Comment 12:** The Discharger requests that the Draft Order require that the Annual Report include a summary of public outreach activities conducted during the calendar year.

**Response 12:** Regional Water Board staff has added the following to Attachment C, section IV.B.1.d of the Proposed Order:

iv. A summary of public outreach activities to educate industrial, commercial, and residential users about the importance of preventing discharges of industrial and toxic wastes to the Facility.

**Comment 13:** The Discharger requests a change of the agency to be notified of a spill after normal business hours from CalEMA to the California Governor's Office of Emergency Services Warning Center (CalOES).

**Response 13:** Regional Water Board staff has made the suggested changes to the footnote on page 6 of Attachment C of the Proposed Order.