CHANGE SHEET

Regional Water Quality Control Board
North Coast Region
August 20, 2020

ITEM: 5

SUBJECT: Public Hearing on Order No. R1-2020-0012 to consider adoption of Waste Discharge Requirements for City of Santa Rosa Regional Water Reuse System, Laguna Treatment Plant, NPDES No. CA0022764, WDID No. 1B83099OSON, Sonoma County (Cathleen Goodwin)

DISCUSSION: Late changes to the Proposed Permit were requested by the Permittee on August 6, 13, and 17, 2020. Text added to the Proposed Permit is identified by underline and text to be deleted from the Proposed Permit is identified by strike-through in this document. Page numbers in parentheses reflect page numbers in the Proposed Order in the Agenda Package. The following are the proposed revisions to the Proposed Order:

A. Changes Requested by the Permittee

1. ***Comment:*** Section IV.A.1, Table 4 (Page 7). The technology-based pH effluent limits should be 6.0 to 9.0. Table Note 2 which states the Basin Plan requirements of 6.5 to 8.5 should be moved to the permit section that prescribes water quality-based effluent limitations.

   Response: Staff agrees with this comment. This change to include the WQBELs of 6.5 to 8.5 was made in response to Russian Riverkeeper Comment 2 in the Response to Comments document. The Proposed Permit has been modified as follows in response to this comment:

Table 4. Final Technology-Based Effluent Limitations – Discharge Points 001, 006A(1), 012A(1), and 015 (Monitoring Location EFF-001)

Parameter	Units	Effluent Limitations				
		Average Monthly[1]	Average Weekly[1]	Maximum Daily[1]	Instantaneous Minimum[1]	Instantaneous Maximum[1]
Biochemical Oxygen Demand 5-day @ 20°C (BOD5)	mg/L	10	15	--	--	--
Total Suspended Solids (TSS)	mg/L	10	15	--	--	--

Parameter	Units	Effluent Limitations				
		Average Monthly[1]	Average Weekly[1]	Maximum Daily[1]	Instantaneous Minimum[1]	Instantaneous Maximum[1]
pH					~~6.5[2]~~ 6.0	~~8.5[2]~~ 9.0

Table Notes:

1. See Definitions in Attachment A and Compliance Determination discussion in section VII of this Order.

~~2. For transfers of disinfected tertiary effluent to storage pH shall be within the limits of 6.0 and 9.0. All discharges to surface waters shall be within the limits of 6.5 and 8.5.~~

The following language has been added as Order Section IV.A.2.a.iv:

"**Effluent Limitations for pH.** The discharge of treated effluent shall be within the pH limits of 6.5 and 8.5 standard units at all times.

Compliance with these effluent limitations shall be determined in accordance with sections VII.F and G (Compliance Determination) of this Order."

2. ***Comment.*** Section VI.C.7, Compliance Schedules (Page 29). The Permittee requested removal of tasks from the compliance schedule that do not need to be identified as compliance tasks within the Proposed Permit.

Response: The tasks proposed for deletion, although necessary tasks, are standard tasks that must be completed in order to comply with the final compliance date but the timing for completion of these tasks could vary and changes in the timing of these tasks are not expected to affect the final compliance date. The Proposed Permit has been revised as follows:

"The Permittee shall comply with the following schedule in order to comply with UV system operational requirements and achieve consistent compliance with Total Coliform effluent limitations. No later than 14 days following each compliance dates for Tasks 2 through 3, the Permittee shall notify the Regional Water Board, in writing of its compliance with the compliance requirement.

Table 1. Schedule for Compliance with UV Disinfection System Operational Requirements and Total Coliform Effluent Limitations

Task	Proposed Action	Compliance Date
1	Submit progress reports to the Regional Water Board Executive Officer	March 1, annually
~~2~~	~~Secure project funding (conduct bond sales)~~	~~July 2020 – July 31, 2022~~

~~3~~	~~Select UV disinfection system equipment and design and permit the project~~	~~January 2016 – December 31, 2022~~
~~4~~	~~Advertise for bidding~~	~~January 1, 2023~~
~~5~~	~~Award construction contract~~	~~July 1, 2023~~
~~6~~ 2	Complete ~~C~~construction of on-site diversion system and UV disinfection system upgrade project	~~July 2023~~ December 31, 2024
~~7~~	~~Commission UV disinfection system~~	~~December 1, 2024~~
~~8~~	~~Conduct UV testing and DDW evaluation~~	~~July 1, 2025~~
~~9~~ 3	Achieve full compliance with UV system operational requirements[11] and effluent limitations	September 30, 2025

[11] Compliance with UV system operational requirements includes completion of testing the upgraded UV disinfection system as specified by Title 22 and documentation of acceptance of the UV disinfection system by DDW (i.e., DDW acceptance letter)."

3. ***Comment:*** Monitoring and Reporting Program (MRP) Section II, Table E-1 (Page E-4). The Monitoring Location Description for RSW-LTR is missing Discharge Point 006B in the first sentence, and, in the second sentence identifies Discharge Point 006A(2) incorrectly as 016A(2). Fix second sentence.

   Response: Discharge Point 006B was inadvertently omitted from the first sentence and the second sentence contains a typographical error.

   The Monitoring Location Description for RSW-LTR has been corrected in Table E-1 as follows: "Laguna de Santa Rosa at Todd Road, downstream of discharges from Discharge Points 006A(1), 006A(2), 006B, and 015. Alternatively, the Permittee may propose an alternative means of monitoring downstream of Discharge Points 006A(1), ~~016A(2)~~006A(2), 006B, and 015[4]."

4. ***Comment:*** MRP Sections IV.B (Table E-5, Table Note 8) and IV.C (Table E-6, Table Note 9) (Pages E-14 through E-18). The Permittee states that these tables should not require influent monitoring to occur concurrently with the effluent and receiving water monitoring when discharging from the ponds because plant influent is separate from the pond storage system.

Response: Staff agree that there isn't enough of a relationship between the pollutants in the influent and wastewater discharged from storage ponds due to the long detention times in the wastewater treatment plant and long holding times in the storage ponds. Staff don't think it necessary to require influent monitoring to occur concurrently with discharge monitoring. Concurrent monitoring of influent and effluent discharged has not been required in past permits. Staff recommends removing the requirements to conduct influent monitoring concurrent with discharge monitoring, but to retain the requirement to require concurrent monitoring of effluent discharged and receiving water. Several changes have been made to the Proposed Permit in response to this comment, as follows:

MRP Tables E-5 and E-6 apply to discharges from Meadow Lane Pond and Delta Pond, respectively. Table Note 8 of Table E-5 and Table Note 9 of Table E-6 of the Proposed Permit have been modified as requested by the Permittee to remove the requirement to monitor influent concurrently with the discharge as follows:

"~~Influent, e~~Effluent~~,~~ and receiving water monitoring for CTR priority pollutants shall be conducted concurrently."

In addition, Table E-2, has been modified to remove Table Note 5 as follows: "~~Influent, effluent, and receiving water monitoring for CTR priority pollutants shall be conducted concurrently.~~"

In addition, a new table note (Table Note 16) has been added to Table E-4 to read: "Effluent and receiving water monitoring for CTR priority pollutants shall be conducted concurrently."

Finally, Table E-8 has been modified to make the Table Note related to concurrent monitoring of CTR priority pollutants consistent with the changes to Tables E-2, E-4, E-5, and E-6. Table Note 7 to read: "~~Influent, e~~Effluent, and receiving water monitoring for CTR priority pollutants shall be conducted concurrently."

5. ***Comment:*** MRP Section IV.A.2 (Table E-4, Table Note 15), Section IV.B (Table E-5 Table Note 10) and Section IV.C (Table E-6 Table Note 11) (Pages E-8 through E-18). These table notes require twice per year monitoring for CTR Priority Pollutants. The Permittee requests clarification as to whether the requirement to monitor CTR priority pollutants applies only when discharging.

Response: The requirement to monitor CTR priority pollutants two times between the months of December and April applies whether there is a discharge or not. It is crucial that sufficient data is collected during the term of the Proposed Permit to support the reasonable potential analysis prior to development of the next permit. These table notes have been modified to read as follows: "Monitoring for CTR priority pollutants shall occur at least two times per year between the months of December and April ~~during periods of discharge to surface waters~~. Sampling shall occur preferentially during at least one period of discharge. If no discharge occurs during a discharge season, both samples may occur during periods of no discharge."

6. ***Comment:*** MRP Section VII.A.1, Table E-7 (Page E-29) requires use of the Colilert analytical method for Total Coliform Bacteria. The Permittee does not currently utilize the Colilert method and requests that the Proposed Permit include the option to use other approved coliform analytical methods (Part 136) when producing recycled water.

   Response: Staff agrees with the need to make this change. The Proposed Permit has been modified as follows:

Table E-7. Recycled Water Monitoring – Monitoring Location EFF-001

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Effluent Flow[1]	mgd	Meter	Continuous	--
Biochemical Oxygen Demand 5-day @ 20°C (BOD5)	mg/L	24-hr Composite	Twice per Week	Part 136[2]
Total Suspended Solids (TSS)	mg/L	24-hr Composite	Twice per Week	Part 136[2]
pH	standard units	Grab	Twice per Week	Part 136[2]
Total Coliform Bacteria[3]	MPN/ 100 mL	Grab	Daily	Part 136[2,4]

Table Notes:

1. The Permittee shall report the daily average and monthly average flows.
2. Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Regional Water Board or State Water Board, such as with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration).
3. The Permittee shall collect, analyze, and report samples from each operating UV disinfection channel for total coliform bacteria. The highest value will be used to determine compliance with coliform bacteria effluent limitations.
4. The SM9223 B Colilert test method ~~will~~ may also be used to quantify total coliform concentrations in recycled water.

7. ***Comment:*** The Permittee requests that the Proposed Permit use the proper name for the Permittee's storage pond monitoring program which is "Storage Pond Integrity Monitoring Program." The Proposed Permit identifies it as "Storage Pond Integrity Leak Monitoring Program".

   Response: Santa Rosa Comment 24 in the Response to Comments document requested modification section VI.C.2.g of the Draft Permit to use the proper name for the Permittee's Storage Pond Monitoring Program which is "Storage Pond Integrity Monitoring Program". The Permittee's new comment requests that this

correction be made throughout the Proposed Permit. Staff agrees with the need to make this correction throughout the Proposed Permit. The word “leak” has been removed from references to the City’s storage pond monitoring program in the following sections of the Proposed Permit: Order section VI.C.2.f (page 28), MRP sections X.D.1 (Table E-11 on page E-42) and X.D.2.i (page E-44) and Fact Sheet sections VI.C.2.f (page F-96) and VI.C (Table F-17 on page F-97).

8. ***Comment:*** Fact Sheet Section III.C.5 (Page F-15) states that the Proposed Permit does not include any compliance schedules, yet a compliance schedule was added to Order Section VI.C.7 in response to comments.

   Response: This section of the Fact Sheet should have been modified to reflect the addition of the UV Disinfection System Compliance Schedule to section VI.C.7 of the Proposed Permit in response to Santa Rosa Comment 8, Part 2. This Fact Sheet section has been modified to reflect the inclusion of the compliance schedule as follows: “Section VI.C.7 of this Order ~~does not~~ includes a compliance schedule for compliance with UV Disinfection System Operational Requirements and Total Coliform Effluent Limitations in Order sections IV.A.1.c and IV.C.1.b ~~and~~ but does not include interim effluent limitations for Total Coliform.”

9. ***Comment:*** Fact Sheet Provision IV.G.3.c. (page F-65 to F-66): The current language has the wrong compliance date and should be changed to “In letters dated December 16, 2019 and April 16, 2020, the Permittee requested an in-permit compliance schedule to complete construction of a new UV disinfection system and interim total coliform limits to allow time to meet total coliform limitations. The Order was revised after the public comment period to include a compliance schedule requiring the Permittee to complete its UV disinfection system upgrade within the term of this Order. The final compliance date set in the compliance schedule in section VI.C.7 of the Order is ~~by July 31, 2025~~ September 30, 2025. The Order was not revised to include interim limitations for total coliform.”

   Response: The Fact Sheet language has been modified as noted by the City in this comment.

10. ***Comment:*** Fact Sheet Provision VI.C.7. (page F-81): The current language says the permit doesn’t include a compliance schedule. The following section should be changed to “Compliance Schedules – ~~Not Applicable~~. This Order ~~does not~~ establishes ~~interim effluent limitations or~~ a schedule~~s~~ of compliance for compliance with UV Disinfection System Operational Requirements and Final Total Coliform ~~e~~Effluent ~~l~~Limitations.”

    Response: The Fact Sheet language has been modified as noted in this comment.

Preliminary Staff Recommendation: Adopt Order No. R1-2020-0012 with modifications proposed in this Change Sheet.