

Attachment 2

**Modifications from Order R3-2006-0019 to Order No. R3-2008-0065
for the
Morro Bay/Cayucos Wastewater Treatment Facility
Modified 301(h) NPDES Permit**

Modifications No.	Page reference	Changes	Reason
1	Entire Permit	Modifications to font size and style	Modifications to font to maintain consistency with 2005 statewide template
2	Table of Contents	Deleted Attachment G	Attachment G (Sanitary Sewer Overflow Management) is no longer need being that the discharger has enrolled into the statewide General SSO WDR program. The Discharger is currently in compliance with that program.
3	Section II of the 2008 Order	Added Findings	<p>New finding added to be consistent with the statewide standard template. Aside from updates language the following findings were added:</p> <ul style="list-style-type: none"> • Background and Rational for Requirements (Section II. D) • Technology-Based Effluent Limitations (Section II.F) • Water Quality-Based Effluent Limitations (Section II.G) • Alaska Rule (Section II.J) • Stringency of Requirements for Individual Pollutants (Section II.K) • Endangered Species Act (Section II.N) • Provisions and Requirements Implementing State Law (Section II.Q) • Statewide Waste Discharge Requirements for Sanitary Sewer Systems (Section II.V)
4	Section II.I of the 2006 Order	Removed Major Discharge finding	The Major Discharge finding was incorporated into the Facility Description Finding B of the 2008 Order.

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5	Section IV.B and C of the 2008 Order	No Changes	Effluent limitations were not modified because the Table B parameters did not change from the 2001 California Ocean Plan to the 2005 California Ocean Plan.
6	Section IV.F of the 2008 Order	Added Reclamation Specifications	Reclamation standards were added because the discharger plans on upgrading the facility to tertiary treatment with the option of reuse. The standard applies only if the discharger reuses.
7	Section V of the 2008 Order	Updated Bacteria Language	Language was updated in accordance with the 2005 Ocean Plan.
8	Section VI.A of the 2008 Order	Updated Standard Provisions	Federal and Regional Standard Provisions have been incorporated to eliminate redundancies (attachment D)
9	Section VI.C.1 of the 2008 Order	Added Reopener Clause	2005 standard template
10	Section VI.C.3 of the 2006 Order	Removed Wastewater Collection System requirements language	Removed language to avoid redundancies with statewide waste discharge requirements for sanitary sewer systems, Order No. 2006-0003-DWQ. The discharger is currently enrolled under this statewide program.
11	Section VI.C.4 of the 2008 Order	Added Receiving Water Monitoring for Bacteria	Language was added to the 2008 Order to be consistent with Section VII.A of the MRP.
12	Section VI.C.5 of the 2008 Order	Added Cat Litter Outreach program	Consistent with USEPA's proposed conservation measures identified in Biological Evaluation.
13	Attachment D of 2008 Order	Revise Standard Provisions	Updated to eliminate redundancies between federal and regional standards.
14	Section I.A – F of the 2008 MRP	Updated General Monitoring Provisions language	2005 statewide template
15	Section IV.A of the 2008 MRP	Added nutrient monitoring	Added nutrient monitoring per proposed USEPA conservation measures. Constituents added include Ammonia (as N), Nitrate (as N), Urea (as N), Ortho-Phosphate (as P), and Dissolved Silica.

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16	Section V.A of the 2008 MRP	Updated Chronic Toxicity Language	2005 standard template
17	Section V.B of the 2008 MRP	Updated Toxicity Identification/Reduction Evaluation language	2005 standard template
18	Section VI of the 2008 MRP	Added Reclamation Monitoring Requirements	Reclamation standards were added because the discharger plans on upgrading the facility to tertiary treatment with the option of reuse. The standard applies only if the discharger reuses.
19	Section VIII of the 2008 MRP	Updated monitoring once during permit term to 2009	Old language required sampling to occur in 2008. Language was updated to incorporate a year within the five year timeframe.
20	Section X.D. of the 2006 Order	Sewage Spill Reporting language removed and updated	Language was placed under Section XI.D.2 of the 2008 Order. The language was updated to coincide with statewide regulations for sanitary sewer systems.
21	Section IX of the 2008 Order	Language update to the Biosolids Monitoring	Language updated to be consistent with 2005 statewide template.
22	Section XI.B.1 or the 2008 MRP	Update electronic self-monitoring report submittal language	2005 standard template
23	Section XI.B.4 of the 2008 MRP	Updated reporting protocol	2005 standard template
24	Section XI.D, 1 and 2 of the 2008 MRP	Added new section "Other reports and Notifications." This sections includes language for cat litter outreach program and sanitary sewer overflow (SSO) reporting and notification requirements.	Language was added in accordance with the proposed USEPA conservation measures (Cat Litter Program). SSO reporting is consistent with the statewide General SSO WDR requirements.
25	Section II.A of the 2008 Fact Sheet	Updated Facility Description Language	Updated language to reflect current conditions and future upgrades.
26	Section II.B of the 2008 Fact Sheet	Updated Effluent Characteristics Table	Updated to include current data.

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27	Section II.D of the 2008 Fact Sheet	Updated regulatory history language	Updated to include recent Water Board actions and USEPA Biological Evaluation and USFWS concurrence.
28	Section IV.A and Section IV.B of the 2008 Fact Sheet	Updated Effluent and Receiving Characteristics	Updated language to reflect most recent data.
29	Section IV.C of the 2008 Fact Sheet	Updated Sewage Spill Table	Updated to include most recent events.
30	Section V f the 2008 Fact Sheet	Added discussion of updates per 2005 standard template	Updated to include most recent state policy.
31	Section VI.C of the 2008 Fact Sheet	Added section for Notice of Hearing Continuance	Added to reflect most recent Water Board actions.
32	Section VI.D of the 2008 Fact Sheet	Added written comment section to receive public comment specific to new information.	This section was added to allow public to comment specifically on the recent USEPA Biological Evaluation and concurrence from USFWS.

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