



**Environmental Utilities
Administration**
2005 Hilltop Circle
Roseville, California 95747

February 13, 2014

Ms. Gayleen Perreira
Senior Water Resources Control Engineer
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Re: Comments on Tentative Waste Discharge Requirements for the City of Roseville
Dry Creek Wastewater Treatment Plant (NPDES No. CA0079502)

Dear Ms. Perreira:

On behalf of the City of Roseville (City), enclosed are comments on the Tentative Waste Discharge Requirements and NPDES permit (Tentative Permit) for the City of Roseville Dry Creek Wastewater Treatment Plant (DCWWTP). The City is particularly concerned about:

- Clear separation and understanding that this NPDES permit regulates the treatment plant and site proper and the wastewater collection system is regulated completely separately under the statewide WDRs
- Minimum UV transmittance requirements are inconsistent with National Water Research (NWRI) guidelines and the spot-check bioassay testing
- The compliance determination for coliform
- Monthly reporting requirements for quarterly chronic toxicity testing

These concerns along with detailed comments are provided in Attachment A.

In the interim, please contact me at (916) 774-5754 or Art O'Brien at (916) 405-8944 if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Glotzbach".

Ken Glotzbach
Wastewater Utility Manager

Attachment A – Comments on DCWWTP Tentative Permit
Attachment - DMR letter from SWRCB to dischargers

cc: Art O'Brien, Robertson-Bryan, Inc.

ATTACHMENT A

CITY OF ROSEVILLE COMMENTS
ON
TENTATIVE
WASTE DISCHARGE REQUIREMENTS
FOR THE
CITY OF ROSEVILLE
DRY CREEK WASTEWATER TREATMENT PLANT (CA 0079502)
PLACER COUNTY

Submitted February 13, 2014

Limitations and Discharge Requirements

p. 3, Monitoring and Reporting. The word “or” is missing from the following quote of the Water Code section 13267, subsection (b)(1):

“In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who...”

p. 4, III.A. Discharge Prohibitions. The City remains concerned that the discharge prohibition, as written, is not clear enough to ensure that the prohibitions apply to the treatment plant only. The City requests the language to be changed as follows:

Discharge of wastewater from the Facility as specifically described in the Fact Sheet, p. F-4, Section II.B is prohibited except as described in this Order at a location or in a manner different from that described in this Order is prohibited.

p. 5, IV. Effluent Limitations and Discharge Specifications. Subsection numbering for Land Discharge Specifications and Recycling Specifications needs to be changed from “E” and “F” to “B” and “C”, respectively.

p. 7, VI. Provisions. Subsections within section VI.A.2 need to be renumbered to begin with “a.” The first subsection currently begins with “g.”

p. 13, VI.C.4.b.ii. The required minimum UV transmittance (UVT) of 66 percent is not consistent with National Water Research Institute (NWRI) guidelines. As per the 2012 NWRI UV guidelines, the default lower level UVT value at which a UV system is allowed to operate when treating non membrane filtration (i.e., granular media filtration) is 55 percent. During the original UV system validation, a control equation was developed which determines UV doses based on flowrate, UVT, and power setting. The lowest UVT values tested during this original system validation testing was 55 percent. During spot-check bioassay testing that was conducted as a part of system commission testing after the completion of construction, the accuracy of this control equation using a correction factor was verified. Therefore, the control system equation is programmed to automatically adjust to changes in flowrate and UVT and maintain the dose

ATTACHMENT A

setpoint of 100 mJ/cm² by automatically adjusting the lamp power, turning on additional banks, or bringing additional channels on-line. Therefore, the UV system should be allowed to operate down to a UVT value of 55 percent (the default value specified in the 2012 NWRI guidelines and the original system validation testing), because the UV control system will not allow the discharge of effluent that has a dose below 100 mJ/cm². It is requested that the text in section VI Section C 4.b.ii be changed to state:

The minimum hourly average UV transmittance (at 254 nanometers) in the wastewater measured at Monitoring Location UVS-001 shall not fall below ~~66~~55 percent.

p. 13, Footnote #1. The section reference in this footnote needs to be changed from VII.B.2.a to VI.B.2.a.

p. 15, b. Sludge/Biosolids. The City requests the following edit/change in terminology in the fourth sentence in this section, to more accurately describe the source of biosolids:

Biosolids refer to ~~sewage~~ sludge that has been treated...

p. 18, Total Coliform Organisms Effluent Limitations, VII.D. The Tentative Order requires coliform testing 5/week. The 7-day median should be determined based on the last 7 tests, not the last 7 days. The requirement in the Tentative Order is inconsistent with the requirements in Title 22, which states:

60301.230. Disinfected tertiary recycled water

b) The median concentration of total coliform bacteria measured in the disinfected effluent does not exceed an MPN of 2.2 per 100 milliliters **utilizing the bacteriological results of the last seven days for which analyses have been completed** (emphasis added) and the number of total coliform bacteria does not exceed an MPN of 23 per 100 milliliters in more than one sample in any 30 day period. No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters.

The language in the Tentative Order will require the City to test and report differently for the recycled water production report under the City's Master Reclamation Permit as opposed to reporting under the NPDES permit. This City sees no reason to have testing language different from Title 22, since it forms the basis for effluent limitation requirements.

The City, therefore requests the following changes to the Tentative Order:

For each day that an effluent sample is collected and analyzed for total coliform organisms, the 7-day median shall be determined by calculating the median concentration of total coliform bacteria in the effluent utilizing the bacteriological results of the last 7 days that a sample is collected. For example, if a sample is collected on a Wednesday, the result from that sampling event and all results from the previous 6 days where total coliform was sampled and tested (~~ie.e.g., Tuesday, Monday, Sunday, Saturday, Friday, and Thursday, Wednesday, and Tuesday~~) are used to calculate the 7-day median. If the 7-day median of total coliform organisms exceeds a most probable

ATTACHMENT A

number (MPN) of 2.2 per 100 milliliters, the Discharger will be considered out of compliance

If the Central Valley Water Board chooses to not change the language, the City requests the following clarifying language to be added to this section. This clarifying language is consistent with p. 18, Section VII.F.3.b:

If the data set has an odd number of data points, then the median is the middle value. If the data set has an even number of data points, then the median is the average of the two values around the middle unless one or both of the points are <2, in which case the median value shall be the lower of the two data points.

Attachment E – Monitoring and Reporting Program (MRP)

p. E-5, Table E-3, Footnote 4. Footnote 4 describes sample collection, analytical method, and report level requirements for methyl mercury monitoring in the effluent. Methyl mercury monitoring is not specified in Table E-3. Further, the reporting level for methyl mercury specified in Footnote 4 of 0.05 ng/L conflicts with the reporting level specified in Table E-8, which requires a reporting level of 0.06 ng/L. Because methyl mercury monitoring is not specified in Table E-3, and because the footnote conflicts with Table E-8 specifications for methyl mercury, the City requests the following edit to Footnote 4 to remove references to methyl mercury:

- ⁴ ~~Unfiltered methyl mercury and~~ Total mercury samples shall be grab samples taken using clean hands/dirty hands procedures, as described in U.S. EPA method 1669: Sampling Ambient Water for Trace Metals at EPA Water Quality Criteria Levels, for collection of equipment blanks (section 9.4.4.2), and shall be analyzed by U.S. EPA method ~~1630/1631~~ 1631 (Revision E) with a reporting level of ~~0.05 ng/L for methyl mercury and 0.5 ng/L for total mercury.~~

p. E-5, V.A. Acute Toxicity Testing. The City requests the sample type for acute toxicity testing be changed from “grab” to “flow proportional 24-hour composite,” consistent with the sample type for acute toxicity testing specified in the Tentative Order for the City’s Pleasant Grove Wastewater Treatment Plant.

p. E-6, 8. Test Failure, item b. The special provision cross-reference in this item should be to section IV.2.a.ii, not iii.

p. E-7, V.D.1, Chronic Test Reporting. The Tentative Order requires that regular chronic testing be done on a quarterly basis. This section requires that these results be reported within 30 days of completion of the test. The City requests that this 30 day reporting be deleted and that this test result be reported with the quarterly self monitoring reports described in Table E-9. The quarterly reporting is sufficient because:

- The receipt of test results exceeding the monitoring trigger during regular monitoring requires notification to the Board within 24-hours after the receipt of test results. (p. E-6, Section V.C)
- Any exceedance of the trigger requires accelerated monitoring,

ATTACHMENT A

- Accelerated monitoring is initiated within 14-days of notification of laboratory of an exceedance of the monitoring trigger, and
- An exceedance during accelerated monitoring requires the preparation of a TRE action plan within thirty (30) days of notification by the laboratory of any test result exceeding the monitoring trigger during accelerated monitoring.

p. E-7, VI.A.1, Table E-5. Table E-5 requires monitoring of parameters when the emergency storage basins have held water for more than 7 days. The first four parameters are already included in the monitoring requirements listed on p.16, Section VI.C.4.c.ix which requires the City to keep a log of the storage basins that is submitted monthly with the eSMR. Because p. 16 of the permit contains the requirement to keep a log, inclusion of the first four parameters in Table E-5 is redundant. The City requests that those parameters be deleted from Table E-5, as shown below:

Table E-5. Land Discharge Monitoring Requirements

Parameter	Units	Sample Type	Minimum Sampling Frequency	Required Analytical Test Method
Discharge Initiation	Date and time	—	1/Day	—
Discharge Completion	Date and time	—	1/Day	—
Basin Emptied	Date and time	—	1/Day	—
Discharge Type ¹	—	—	1/Day	—
Freeboard	Feet ^{2,3}	--	1/Day	--
pH	standard units	Grab	1/Week	4
Electrical Conductivity @ 25°C	µmhos/cm	Grab	1/Week	4
Odors	Observation	--	1/Week	--
Levee Condition	Observation	--	1/Week	--
Dissolved Oxygen	mg/L	Grab	1/Month	4

¹ For example, untreated due to plant upset, secondary treated.

² To be measured vertically to the lowest point of overflow.

³ Include estimation of volume of wastewater in each pond.

⁴ Pollutants shall be analyzed using the analytical methods described in 40 CFR Part 136 or by methods approved by the Central Valley Water Board or the State Water Board.

p. E-10, IX.C.1. This section requires the quarterly priority pollutant samples to be submitted with the monthly SMR's. Since this is a quarterly event, the City requests that the results of such quarterly monitoring be submitted with the quarterly reports to be consistent with the frequency of sampling. As such we request the following change:

Quarterly monitoring shall be conducted during the third year of the permit term (four consecutive samples, evenly distributed throughout the year) and the results of such monitoring be submitted to the Central Valley Water Board with the quarterly reports ~~monthly SMR's~~.

ATTACHMENT A

p. E-17, X.C.2, DMR reporting. The City has received instructions from the SWRCB (See letter to Dischargers, attached) to: "...mail ONLY ONE copy of your DMRs (no need for duplicates)". The City requests the following change:

The Discharger shall submit the original DMR ~~and one copy of the DMR~~ to the address listed below:

p. E-18, D. Other Reports, item 3. The City requests the due date for the report outlining reporting levels and analytical methods be changed from "within 60 days of permit adoption" to "within 60 days of permit effective date," consistent with the due date specified in the Tentative Order for the City's Pleasant Grove Wastewater Treatment Plant.

Attachment F – Fact Sheet

p. F-3, I. Permit Information, item B. This section should be revised to clarify when the current NPDES permit for the Facility was adopted and subsequently amended, as follows:

The Facility discharges wastewater to Dry Creek, a water of the United States, and a tributary to the Sacramento River via the Natomas East Main Drainage Canal, within the Lower American watershed. The Discharger was previously regulated by ~~Order R5-2008-0077-01~~ and National Pollutant Discharge Elimination System (NPDES) Permit No. CA0079502 adopted on 12 June 2008 (Order R5-2008-0077) and amended on 31 May 2013 (Order R5-2008-0077-01), and expired on 1 June 2013. Attachment B provides a map of the area around the Facility. Attachment C provides a flow schematic of the Facility.

p. F-13, IV.A.1. To be consistent with the requested change on p. 4 of the Tentative Order, the City requests the following change to this section in Attachment F:

This prohibition is based on Water Code section 13260 that requires filing of a ROWD before discharges can occur. This prohibition applies specifically to discharges from the wastewater treatment facility and does not apply to the collection system. The collection system is governed State Water Board Order No. 2006-0003-DWQ and any future revisions thereto. The Discharger submitted a ROWD for the discharges described in this Order; therefore, discharges not described in this Order are prohibited.

p. F-35, Settleable Solids WQO. The word "of" needs to be changed to "or" in the following quote of the settleable material water quality objective.

"[w]ater shall not contain substances in concentrations that result in the deposition of material that causes nuisance or adversely affects beneficial uses."

p. F-64, UV transmittance. Consistent with the NWRI guidelines and comment above on p. 13, VI.C.4.b.ii, the UV transmittance in the second paragraph needs to be changed from 66 to 55. The City requests the following change:

The Engineering Report also demonstrates that during validation testing a minimum hourly average UV dose of 100 mJ/cm² with a minimum UV transmittance of 55~~66~~% will

ATTACHMENT A

achieve the virus inactivation required by Title 22 for Disinfected Tertiary Recycled Water.

Dear Dischargers,

In order to ensure a more efficient processing of your DMRs, and to minimize issues and problems we have found in the past, and more importantly to prevent unnecessary **violations**, we are sending you an updated set of instructions that we need you to follow. If you need more assistance on any of these instructions please contact us by phone or email.

1. ALL DMRs need to be submitted by hard copy through the mail with the original wet signature to one of the below mailing addresses (we have added the NPDES Unit room # to ensure all DMRs come directly to us and are not redirected to another unit):

Standard Mail:

Division of Water Quality
NPDES Unit, 15-35A
Attn: DMR Processing Center
P.O. Box 100
Sacramento CA 95812-1000

FedEx/ UPS/ Other Private Carriers:

Division of Water Quality
NPDES Unit, 15-35A
Attn: DMR Processing Center
1001 I Street, 15th Floor
Sacramento, CA 95814

2. Mail ONLY ONE copy of your DMRs (no need for duplicates)
3. Self Monitoring Reports (SMRs), which are different from DMRs, **DO NOT** need to get mailed to the DMR Processing Center (State Water Board). These SMRs only need to be submitted to the corresponding Regional Boards as you normally do. At times, however, we get copies of the SMRs that get submitted to the Regional Board, but we do not need them at the State Water Board. Please update your procedures so that only DMRs are sent to the State Water Board and only SMRs are sent to the Regional Board.
4. When sending emails to DMR@waterboards.ca.gov please always write the permit number (CA#####) in the Subject line so we can quickly identify what facility it relates to.
5. If you generate your own forms, please make sure they match the original DMR forms **EXACTLY** (this includes having the monitoring dates in the correct format MM/DD/YYYY, using the same units indicated in the original DMR but if you

change your units i.e. mg/L to µg/L then add the corresponding unit code of 28 in the form itself in the blank field above the unit, and finally ensure parameter numbers are arranged numerically as in the original DMR form and are accurately copied)

6. Double check forms for correct monitoring dates, correct discharge number, quantity and concentration values, and that all required data fields have been filled with either a data value or an applicable NODI code. **Leaving any field empty will create a non-reporting violation.**
7. Make sure you include on your monthly submittal all the corresponding DMRs with the same monitoring period end date for that month (even if there was no discharge you still need to submit the form with the appropriate NODI code on the top right side of the first page).
8. Upon receiving updated DMRs due to a Permit renewal, please review the updated DMRs and let us know if you find any discrepancies between your permit requirements and what the DMRs require. In your submittal of discrepancies, please include the Permit number and Regional Board Order number.
9. **IT IS VERY IMPORTANT THAT** if contact information for your facility changes to please notify us IMMEDIATELY through email with the new contact name, phone # and appropriate email address. This way we can update our records and ensure future DMRs, notifications of missing DMRs, updated DMRs, etc, will be received.

Contact Information:

DMR Processing Center
Phone: 916-319-9152
Fax: 916-324-6684
dmr@waterboards.ca.gov