

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting –6/7 February 2014**

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**RESPONSE TO WRITTEN COMMENTS ON TENTATIVE WASTE DISCHARGE  
REQUIREMENTS FOR CITY OF SANGER,  
DOMESTIC WASTEWATER TREATMENT FACILITY  
FRESNO COUNTY**

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At a public hearing scheduled for 6/7 February 2014, the Central Valley Regional Water Quality Control Board (Central Valley Water Board or Board) will consider adoption of Waste Discharge Requirements (WDRs), which were circulated as tentative on 16 November 2014, for discharges from the City of Sanger's Domestic Wastewater Treatment Facility (WWTF) to the Lincoln Ponds. This document contains responses to written comments received from interested parties regarding the proposed WDRs. Written comments from interested parties were required to be received by the Regional Water Board by 5:00 p.m. on 16 December 2014 in order to receive full consideration. Comments were received from:

- a. City of Sanger; and
- b. Central Valley Clean Water Association (hereafter CVCWA).

Staff has made some minor changes to the proposed WDRs based on the comments. Staff has also made changes to the proposed WDRs to increase clarity and fix typographical errors. Where specific changes are presented below, additions are in bold text and deletions are in strike-out.

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**CITY OF SANGER COMMENTS**

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Below are the City's salient comments followed by Board staff's responses.

**CITY OF SANGER – COMMENT 1:** The City of Sanger (hereafter City) indicates that, in response to a 1998 WDR Requirement (the requirement in WDRs 98-141 that mandated a Pretreatment Program), the City adopted an Ordinance for Industrial Discharge Requirements, and that this program constitutes a Pretreatment Program for the City. In its comment letter, the City does not ask for Provision F.16 (which requires the City to complete its Pretreatment Program) to be removed from the proposed WDRs, but it has verbally requested the Central Valley Water Board staff remove this provision. The City states that it has not seen "heavy metals" in the sewage sludge (sampled twice annually) and that this is an indicator of the strict industrial restrictions on the discharge.

**RESPONSE:** No changes were made to the proposed WDRs. The Board has evidence that though the City has both an Industrial WWTF (regulated by WDRs Order 98-131) and a Domestic WWTF (currently regulated by WDRs 98-141, which will be replaced by the proposed WDRs), the Domestic WWTF nonetheless may still receive wastes from some industrial sources. A single Pretreatment Program would ensure that industrial wastes are properly regulated by the City at either WWTF.

Furthermore, the City's work in establishing a Pretreatment Program remains incomplete. Both WDRs Order 98-141 and WDRs Order 98-131 require the City to implement a Pretreatment Program by 1 February 1999. The City did considerable work to complete the Pretreatment Program. It reportedly adopted an "Ordinance for Industrial Discharge Requirements" on 18 February 1999. It then submitted a draft Pretreatment Program to the Central Valley Water Board in October 2001. Following several revisions to the Pretreatment Program, Board staff provided recommendations on how the City could complete the Pretreatment Program in June 2004. However, the City never finalized the Pretreatment Program.

Board staff recognize that the City has adopted the above mentioned ordinance, but the City has not demonstrated that the ordinance complies with the Board's legal expectations. Further, in the Board's view, Pretreatment Programs consist of at least the following:

1. A local pretreatment ordinance;
2. A use permit system;
3. A program of monitoring and inspection to insure compliance with the ordinance and use permit; and
4. An enforcement program sufficient to obtain compliance with provisions of the ordinance or use permit.

While the Board has been made aware that the City has a pretreatment ordinance, it is unclear whether the City has a use permit system in place. The Board also does not have evidence that the City has a monitoring and inspection program for new or existing users, and it does not appear that the City has a pretreatment enforcement program, either. The proposed WDRs require the City to finish the process it never completed, and require that the City do a better job keeping the Board informed of the status of its Pretreatment Program development efforts.

**CITY OF SANGER – COMMENT 2:** The City requests Effluent Limitation B.3 be removed and states that the Groundwater Limitations are sufficient in addressing effluent nitrogen. The City requests the due dates in the compliance schedule in Provision F.19 be extended as follows:

- Task a. 18 months from the adoption of this Order;
- Task b. 3 years from the adoption of this Order; and
- Task c. 6 years from the adoption of this Order.

**RESPONSE:** The City's discharge has polluted groundwater with nitrate as nitrogen. While Effluent Limitation B.3 and Provision F.19 were not deleted, the proposed WDRS and Information Sheet have been modified to make it clear that the City can pursue other measures to ensure its effluent does not continue to pollute groundwater and to allow the City more time to investigate its options. The changes to Effluent Limitations B.3 and Provision F.19 follow:

B.3. "The monthly average concentration of total nitrogen in the discharge shall not exceed 10 mg/L, **or the Discharger shall implement other measures to ensure discharges do not cause groundwater to exceed 10 mg/L of nitrate as nitrogen.** The Discharger shall achieve compliance with this limit in accordance with Provision F.19."

F.19 "The Discharger shall comply with Effluent Limitation B.3 and Discharge Specification ~~C.2~~ **C.1** in accordance with the following compliance schedule:

<b>Task</b>	<b>Task Description</b>	<b>Due date</b>
a.	Submit a work plan and implementation schedule that identifies the <b>specific</b> measures the City will employ to ensure compliance with Effluent Limitation B.3 and Discharge Specification <b>C.12</b> and/or other measures the City will implement to ensure that the discharge does not cause or continue to contribute to violations of the Groundwater Limitations of this Order (e.g., lined storage ponds and effluent nitrogen application at agronomic	<b>(612 months from the adoption of this Order)</b>

	rates). The work plan and implementation schedule shall be subject to the approval of the Executive Officer.	
b.	Begin implementation of the approved work plan and schedule.	<b>In accordance with the approved schedule, but by no later than (4 <u>2</u> years from the adoption of this Order)</b>
c.	Submit a technical report demonstrating complete implementation of the approved work plan and schedule. Upon receipt of written concurrence of Executive Officer approval of the technical report, this provision shall be considered satisfied.	<b>In accordance with the approved schedule, but by no later than (2 <u>6</u> years from adoption of this Order)."</b>

**CITY OF SANGER – COMMENT 3:** The City states that the time frames in Provision F.20 are too aggressive. The City further states that all six of the current groundwater monitoring wells are currently dry and additional groundwater monitoring wells will likely be required to assess the extent of the degradation/pollution from the City’s discharge of wastewater to the Lincoln Ponds. The City requests the due dates in the compliance schedule in Provision F.20 be extended as follows:

- Task a. 4 years from the adoption of this Order;
- Task b. 7 years from the adoption of this Order;
- Task c. 7.5 years from the adoption of this Order; and
- Task d. 14 years from the adoption of this Order.

The City also comments that it is not opposed to CVCWAs approach to deleting the Provision until Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) efforts are further along.

**RESPONSE:** The City’s discharge has polluted groundwater with nitrate as nitrogen, and there are residences that use shallow groundwater for domestic supply within a few hundred feet of the Lincoln Ponds. The Board must therefore take steps to ensure that the City is rectifying the groundwater impairments on a shorter schedule than that proposed by the City. However, Board staff are proposing limited extensions in the due dates in Provision 20, and the Task Descriptions have been modified to clarify that the Board’s primary focus should be on ensuring that the measures that the City is implementing prior to discharge ultimately resolve the pollution issues in the groundwater. The modifications follow:

F.20 “The Discharger shall comply with Groundwater Limitation D.1.(i) in accordance with the following compliance schedule:

<u>Task</u>	<u>Task Description</u>	<u>Due date</u>
a.	Submit a work plan and time schedule that identifies the methods proposed for assessing the horizontal and vertical extent of nitrate nitrogen pollution in the	<b>(1 year from the adoption of this</b>

	vicinity of the Lincoln Ponds.	Order).
b.	Submit a technical report that describes the horizontal and vertical extent of nitrate nitrogen pollution in the vicinity of the Lincoln Ponds. <b>Provide an estimate of how long it will take for groundwater to meet applicable water quality objectives after the Discharger implements measures required under this Order.</b> <del>and that evaluates remedial actions and cleanup alternatives and proposes an appropriate course of action. The report is subject to Executive Officer approval.</del>	<b>In accordance with the approved schedule, but by no later than (3 <u>4</u> years from adoption of this Order)</b>
c.	<b>Annually, submit a technical report analyzing groundwater quality and progress towards meeting applicable water quality objectives. Implement approved course of action.</b>	<b>Annual progress report (by 1 February of each year) In accordance with the approved schedule, but by no later than (3.5 years from adoption of this Order)</b>
d	<b>If the periodic monitoring required in Subsection c, above, indicates that it will take longer than 10 years from the adoption of this Order for groundwater to meet the nitrate as nitrogen limit of 10mg/L, the Discharger shall submit a work plan with a compliance schedule for implementing additional measures to meet applicable water quality objectives. The proposed work plan and compliance schedule shall be subject to Executive Officer approval and may be incorporated into future Board Orders. Comply with the nitrate as nitrogen groundwater limit of 10 mg/L. Upon receipt of written concurrence of Executive Officer, this provision shall be considered satisfied.</b>	<b>As required by the Executive Officer (40 years from adoption of this Order)."</b>

Regarding the City's reference to CV-SALTS, see the responses to CVCWA – COMMENT 1 and CVCWA - COMMENT 2, below.

As described in the City's comment letter, monitoring wells MW-1 through MW-6 have gone dry. Central Valley Water Board staff added Provision 21 below, to address the status of the existing groundwater monitoring network:

**F.21 “The City shall at all times maintain an operational groundwater monitoring well network. If wells go dry, and remain dry for more than four consecutive quarters, or are otherwise rendered inoperable, they shall be augmented within six months of the last unsuccessful sampling event with in-kind wells drilled to monitor first encountered groundwater. The City shall obtain approval of replacement well locations and construction details by submitting a technical report to the Central Valley Water Board for Executive Officer written approval. For monitoring wells MW-1 through MW-6, which have gone dry as described in Finding 19, the City shall follow the following schedule of Tasks for replacement:**

<u>Task</u>	<u>Task Description</u>	<u>Due date</u>
a.	Submit a work plan for replacement groundwater monitoring wells MW-1 through MW-6.	(60 days from the adoption of this Order)
b.	Install and sample the replacement monitoring wells after receiving the Executive Officer’s approval of the work plan required under Task a. The wells shall be sampled consistent with the requirements of Monitoring and Reporting Program R5-2014-XXXX.	(12 months from the adoption of this Order).

**CITY OF SANGER – COMMENT 4:** The City had several “Additional Comments” to the proposed WDRs listed under Comment 4. Those comments are addressed as follows.

**CITY OF SANGER – COMMENT 4.i.** The City requests Finding 8 of the proposed WDRs be modified as follows:

“8. WDRs Order 98-141 allows for a discharge of up to 3.0 million gallons per day (mgd). The **design influent average annual and maximum monthly biochemical oxygen demand (BOD) are in the influent averages 224 milligrams per liter (mg/L) and 276 mg/L, respectively. The design influent average annual and maximum monthly the total suspended solids (TSS) concentrations are average 226 mg/L, and 308 mg/L, respectively.”**

**RESPONSE:** The requested changes were made to Finding 8 of the proposed WDRs.

**CITY OF SANGER – COMMENT 4.ii.** The City requests that a finding be added to the Groundwater Conditions section of the proposed WDRs to note that the groundwater monitoring wells are currently dry.

**RESPONSE:** A new Finding 19 that reads as follows has been inserted into the proposed WDRs:

**“19. The six wells, MW-1 through MW-6, that make up the City’s groundwater monitoring network have gone dry. Provision F.21 requires the City to submit a work plan to replace the currently dry groundwater monitoring well network and a time schedule for the wells to be installed within 12 months from adoption date of this Order.”**

**CITY OF SANGER – COMMENT 4.iii.** The City requests that the sentence following Finding 44.h. that refers to the requirement of an industrial pretreatment program be deleted.

**RESPONSE:** No changes were made to Finding 44. See the response to the CITY OF SANGER – COMMENT 1.

**CITY OF SANGER – COMMENT 4i.v.** The City notes that Finding 48 requires the City to evaluate potential reclamation, but no requirement was found in the proposed WDRs.

**RESPONSE:** Central Valley Water Board staff added Provision F.22 to address potential recycling of wastewater to land as follows:

**F.22 “The Discharger shall evaluate land disposal options and expanded wastewater recycling and reclamation opportunities. If the evaluation shows that year-round or continuous reuse of all the wastewater is not practicable, consideration must be given to partial reuse of the flow and seasonal reuse. The City shall submit the results of its evaluation by (12 months from the adoption of this Order).”**

**CITY OF SANGER – COMMENT 4.v.** The City notes a typographical error in Effluent Limitation B.1. The monthly average flow of the WWTF is 3.0 mgd, not 0.3 mgd.

**RESPONSE:** Effluent Limitation B.1 has been corrected.

**CITY OF SANGER – COMMENT 4.vi.** The City requests clarification of the footnote in Groundwater Limitation D.1.a.ii.

**RESPONSE:** Footnotes 1 and 3 in Groundwater Limitation D.1 have been removed.

**CITY OF SANGER – COMMENT 4.vii.** The City requests a paragraph be added to the Information Sheet describing that the current monitoring well network is dry.

**RESPONSE:** A new paragraph that reads as follows has been inserted into the Information Sheet:

**“In December 2013, the City notified Central Valley Water Board staff that all six of its groundwater monitoring wells around the Lincoln Ponds (MW-1 through MW-6) had gone dry. This Order contains Provision F.21 that requires the City to submit a work plan describing the installation of replacement groundwater monitoring wells and includes a time schedule requiring the wells to be installed in no greater than one year from the adoption of this Order.”**

**CITY OF SANGER – COMMENT 5:** The City had several “Additional Comments” to the Monitoring and Reporting Program listed under Comment 5, and those comments are addressed as follows.

**CITY OF SANGER – COMMENT 5.i.** The City requests that the frequency of monitoring the influent for BOD and TSS be changed from weekly to twice monthly, which is the same as the proposed frequency of monitoring the effluent.

**RESPONSE:** The requested change has been made to the Influent Monitoring frequency on page 2 of the MRP.

**CITY OF SANGER – COMMENT 5.ii.** The City requests that the sample type listed for pH in the Effluent Monitoring section on page 2 be modified to composite rather than grab. The City states this is how the pH sampling is currently conducted.

**RESPONSE:** The requested change has been made to the Effluent Monitoring on page 2 of the MRP.

**CITY OF SANGER – COMMENT 5.iii.** The City requests that the effluent sampling listed on page 3 in the Effluent Monitoring section be removed as the sampling for these constituents is already done and the results show little variation.

**RESPONSE:** No changes were made to the MRP. The City currently samples the effluent annually for some of the requested general minerals (calcium, chloride, magnesium, potassium, sodium, and sulfate), but none of the other constituents listed on page 3, other than total nitrogen. Annual (once a year) sampling for these constituents is warranted to evaluate the concentrations of these constituents in effluent.

**CITY OF SANGER – COMMENT 5.iv.** The City states that the current groundwater monitoring frequency is annually, and increasing the groundwater monitoring frequency to quarterly will dramatically increase the cost. The City requests the proposed groundwater monitoring frequency remain annually.

**RESPONSE:** The discharge of wastewater has polluted groundwater and the existing groundwater monitoring well network has gone dry. This Order contains Provision F.21 that requires the City to evaluate and install replacement groundwater monitoring wells. Annual groundwater monitoring is not sufficient to evaluate the degradation and pollution of groundwater from the City’s discharge and to determine if there are any seasonal trends in groundwater quality. The Groundwater Monitoring section on page 4 of the MRP was modified as follows:

“The Discharger shall monitor all wells in its Groundwater Monitoring Network, and any additional wells installed pursuant to this MRP, for the following:

<u>Frequency</u> <sup>1</sup>	<u>Constituent/Parameter</u>	<u>Units</u>	<u>Sample Type</u>
Quarterly/ <b>Semiannual</b>	Depth to Groundwater	Feet <sup>12</sup>	Measured
Quarterly/ <b>Semiannual</b>	Groundwater Elevation	Feet <sup>23</sup>	Computed
Quarterly/ <b>Semiannual</b>	pH	pH Units	Grab

Quarterly/ <b>Semiannual</b>	EC	umhos/cm	Grab
Quarterly/ <b>Semiannual</b>	Nitrate as nitrogen	mg/L	Grab
Quarterly/ <b>Semiannual</b>	TKN	mg/L	Grab
Quarterly/ <b>Semiannual</b>	Ammonia	mg/L	Grab
Quarterly/ <b>Semiannual</b>	Total Nitrogen	mg/L	Computed
Quarterly/ <b>Semiannual</b>	General Minerals	mg/L	Grab

1. **Newly installed groundwater monitoring wells will be sampled quarterly for a period of one year and semiannually (twice/year) after four-quarters of sampling data have been collected. If existing wells re-water due to a rise in the groundwater table, they shall be monitored semiannually.**
2. To the nearest hundredth of a foot.
3. To the nearest hundredth of a foot above Mean Sea Level.”

**CITY OF SANGER – COMMENT 5.v.** The City questions the need for a “computed average” for the Source Water Monitoring requirements on page 4 of the MRP and requests the requirement for the computed average be eliminated.

**RESPONSE:** No changes have been made to the MRP to address this comment. The City of Sanger provides source water from a series of groundwater monitoring wells, as described in Finding 11 of the proposed WDRs. The results need to be a flow weighted average of the wells sampled.

**CITY OF SANGER – COMMENT 5.vi.** The City states that it currently employs a licensed sludge hauler to test its accumulated sludge every six months or semiannually, and the hauler transports the dried sludge offsite every two years. The proposed sampling frequency is quarterly, and the City requests the frequency continues at semiannually.

**RESPONSE:** No changes were made to the proposed MRP. Monitoring of sewage sludge is required per Title 40 of the Code of Federal Regulations (40 CFR), Part 503.16. The frequency of sampling is determined by the volume of sludge generated, as listed in the Sludge/Biosolids Monitoring section on page 5 of the MRP.

**CITY OF SANGER – COMMENT 5.vii.** The City requests that a groundwater contour map be required only once per year, not one for each quarter.

**RESPONSE:** The frequency of groundwater monitoring has been changed as discussed in the response to CITY OF SANGER – COMMENT 5iv. Groundwater contour maps shall be required at the same frequency as the groundwater monitoring is conducted (quarterly monitoring for new wells for a period of one year, and semiannual thereafter).

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## **CVCWA COMMENTS**

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**CVCWA - COMMENT 1:** CVCWA comments that Provision 19 doesn’t provide enough time for City of Sanger to reasonably comply with Effluent Limitation B.3 and Discharge Specification C.1 and states that the CV-SALTS program may alter compliance with Provision 19. CVCWA recommends a more reasonable time frame and to allow solutions to be developed in CV-SALTS to be implemented.

**RESPONSE:** The dates in Provision F.19 have been extended. See response to CITY OF SANGER - COMMENT 2.

However, the Board cannot make changes to Provision F.19 solely based on the fact that CV-SALTS may address salt issues of the type seen at this facility at some point in the future through an amendment to the Board's Basin Plan. Though Board staff is well aware that alternative compliance determinations or "regional compliance strategies" are currently being discussed by CV-SALTS, there are a few factors present at the City's facility that may render even these types of proposals inapplicable to this specific discharge. These include:

1. Upgradient groundwater not influenced by the specific discharge is high quality and meets water quality objectives for nitrate as nitrogen;
2. As described in Finding 15 and Findings 18 through 21, groundwater is present in a coarse-grained, unconfined aquifer at shallow depths of 20 to 45 feet below the ground surface; and
3. Shallow groundwater is used for domestic supply. There are at least two residences approximately 200 feet or less upgradient but likely within the influence of the mound of the Lincoln Ponds, a residence about 500 feet downgradient of the Lincoln Ponds, and several residences within a half mile or less downgradient of the Lincoln Ponds.

Shallow groundwater has been polluted by the discharge. Shallow groundwater is used beneficially as domestic supply. The Central Valley Water Board is obligated to ensure that Waste Discharge Requirements it adopts comply with the Tulare Lake Basin Plan and State Board Resolution 68-16 and are protective of the existing beneficial use of domestic supply. If CV-SALTS efforts result in Basin Plan amendments altering how the Central Valley Water Board should address Sanger's situation, the adopted WDRs can be reopened and modified to be consistent with the Basin Plan requirements.

**CVCWA - COMMENT 2:** CVCWA is concerned that the proposed WDRs require the City of Sanger to be comply with groundwater quality objectives for nitrate as nitrogen within 10 years. CVCWA states the Provision does not appear to be consistent with the discussions in CV-SALTS and does not appear to take into consideration if actual drinking water uses are actually being harmed. CVCWA recommends Provision F.20 be deleted until such time as CV-SALTS is completed or be revised to allow the City to consider a number of different options besides showing compliance with the nitrate water quality objective in groundwater within ten years.

**RESPONSE:** Regarding the compliance schedule and compliance with CV-SALTS, see the response to CITY OF SANGER - COMMENT 3 and the response to CVCWA - COMMENT 1. Regarding the drinking water uses being harmed, it is important for Sanger to assess the horizontal and vertical extent of nitrate nitrogen pollution caused by its discharge. As discussed in the response to the CITY OF SANGER - COMMENT 3 and CVCWA -COMMENT - 1, the beneficial uses of the underlying groundwater are domestic supply and the City of Sanger's discharge from the Domestic WWTF to the Lincoln Ponds has polluted groundwater with nitrate as nitrogen, hence affecting the beneficial use of the underlying groundwater for municipal and domestic supply.

Additionally, the provision does not specifically require the City to propose active remediation to meet the water quality objective, but rather to evaluate remedial actions and cleanup alternatives and recommend an appropriate course of action after gauging the effectiveness of improvements made at the facility and/or ponds to mitigate against nitrate impacts in groundwater. Given the coarse nature of areal soils, the upgradient high quality source of recharge from the Harp ditch combined with the effluent nitrogen reduction required by

Provision F.19 of the WDRs, the City may be able to demonstrate that groundwater will meet the objective within the time frame in Provision F.20 through passive attenuation/dilution.

Provision F.20 affords Sanger a substantial period to come into compliance with the nitrate nitrogen water quality objective. If during that period CV-SALTS recommends and the Central Valley Water Board adopts into the Basin Plan different objectives or different ways to evaluate and address the pollution caused by Sanger's discharges, the WDRs can be reopened and appropriately modified.

**CVCWA - COMMENT 3:** CVCWA questions why the proposed WDRs for the City of Sanger's Domestic WWTF include the requirement of a pretreatment program and the additional cost associated with it. CVCWA states the requirement is more appropriate for the separately permitted Industrial discharge (WDR Order 98-131). CVCWA recommends that Provision F.16 be modified to reassess if a pretreatment program is required.

**RESPONSE:** No changes have been made based on this comment to the proposed WDRs. See the response to the CITY OF SANGER - COMMENT 1. In addition, the presumption that the City does not allow industrial dischargers to connect to the domestic system is in error. The City has had industrial discharges connected to its Domestic WWTF collection system, and may have two categorical industries connected to it now. The City has provided no evidence to the contrary and not provided any evidence that it will prohibit such discharges to its Domestic WWTF.

**CVCWA - COMMENT 4:** CVCWA recommends footnote 1 in Groundwater Limitation D.1.a(i) be removed or modified to be consistent with Title 22, Chapter 15, section 64432(1).

**RESPONSE:** See response to CITY OF SANGER - COMMENT - 4vi.

**CVCWA - COMMENT 5:** CVCWA notes Finding 36 of the proposed WDRs explains the basis of potential salinity values to interpret the narrative objective for protection of agricultural uses and requests that page 3 of the Information Sheet 3 be edited to be consistent with Finding 36.

**RESPONSE:** Finding 36 (now Finding 37) of the proposed WDRs includes a discussion of how salinity values are considered on a case by case basis. Inclusion of the entire narrative contained in Finding 36 in the Information Sheet is not warranted as the statement in the Information Sheet was only clarifying that the City's effluent EC results are less than 700 umhos/cm, a level that can be used on all crops. The requested section of the Information Sheet was modified as follows:

“**Groundwater** EC is less than the **most stringent** Agricultural ~~limit~~ **goal** of 700 umhos/cm and TDS and chloride are less than their respective Secondary MCLS.”

**CVCWA - COMMENT 6:** CVCWA notes a typographical error in Effluent Limitation B.1. The monthly average flow of the WWTF is 3.0 mgd, not 0.3 mgd. .

**RESPONSE:** Effluent Limitation B.1 has been corrected.

**CVCWA - COMMENT 7:** CVCWA notes a typographical error in Provision F.17.h: Trucked was incorrectly spelled as “tucked.”

**RESPONSE:** Provision F.17.h has been corrected.

**CVCWA - COMMENT 8:** CVCWA notes Provision F.19.a contains an incorrect identification of a Discharge Specification C.2. The reference should have been to Discharge Specification C.1.

**RESPONSE:** The Discharge Specification cited in Provision F.19.a has been corrected.