

Central Valley Regional Water Quality Control Board
18/19 February 2021 Board Meeting

Response to Comments
for the
City of Rio Vista
Northwest Wastewater Treatment Facility
Tentative Waste Discharge Requirements

The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements, National Pollutant Discharge Elimination System (NPDES) Permit CA0083771 renewal for the City of Rio Vista (Discharger) Northwest Wastewater Treatment Facility (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 3 December 2020 with comments due by 4 January 2021. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from Discharger. Some changes were made to the proposed Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

DISCHARGER COMMENTS

1. Discharger Comment 1: Copper Effluent Monitoring Frequency

The tentative order included monthly effluent monitoring for copper. The Discharger requested that quarterly effluent monitoring for copper be retained from the current NPDES permit, given the large dilution available in the receiving water and considering the financial burden of increased monitoring costs to the Discharger.

RESPONSE: Central Valley Water Board staff concurs and the requested changes have been made in the proposed Order.

2. Discharger Comment 2: Ammonia Effluent Monitoring Frequency

The tentative order included weekly effluent monitoring for ammonia. The Discharger requested that effluent monitoring for ammonia be changed to quarterly, given the large dilution available in the receiving water and considering the financial burden of increased monitoring costs to the Discharger.

RESPONSE: Central Valley Water Board staff have updated the effluent ammonia monitoring frequency in the proposed order to 1/month. Effluent ammonia should be monitored more frequently than quarterly to ensure the Facility is operating properly and to avoid acutely toxic concentrations in the effluent discharge.

3. Discharger Comment 3: New monitoring requirements for chlorpyrifos and diazinon

The tentative order included annual effluent monitoring for chlorpyrifos and diazinon. The Discharger comments that the analytical costs for monitoring these constituents are significant for the City of Rio Vista, which has areas classified by the state as disadvantaged and severely disadvantaged communities. The Discharger requested that Central Valley Regional Water Board staff consider the increased financial burden resulting from these additional monitoring requirements.

RESPONSE: Central Valley Water Board staff are understanding of increasing monitoring and analytical costs placed on dischargers, especially as they impact disadvantaged communities. In this case, annual monitoring for chlorpyrifos and diazinon is required, at a minimum, per federal regulations to evaluate compliance with the effluent limitations which are included in the proposed Order per the *Basin Plan Amendment for the Control of Diazinon and Chlorpyrifos Runoff into the Sacramento-San Joaquin Delta*, effective 10 October 2007.

4. Discharge Comment 4: New monitoring requirement for Dissolved Organic Carbon

The tentative order included quarterly effluent monitoring for dissolved organic carbon (DOC). The Discharger requested that Central Valley Regional Water Board staff consider the increased financial burden resulting from this additional monitoring and proposed removing the requirement.

RESPONSE: Central Valley Water Board staff concurs, and the requested changes have been made to the proposed order. The updated U.S. EPA National Ambient Water Quality Criteria for aluminum in freshwater reflects the latest science and allows for development of criteria reflecting the impact of local water chemistry on aluminum toxicity to aquatic life. The updated criteria account for the site-specific availability of aluminum in receiving waters, which is dependent on pH, DOC, and hardness. Considering the low aluminum concentrations in the Facility discharge, additional effluent DOC monitoring is not needed. Central Valley Water board staff will continue to use a conservative estimate for effluent DOC in aluminum criteria calculations in lieu of monitoring data. Furthermore, the proposed Order requires effluent DOC monitoring as part of the effluent characterization and pyrethroid pesticide monitoring that will be sufficient.

5. Discharger Comment 5: New Monitoring Requirements for Pyrethroids pesticides, Total Organic Carbon, Dissolved Organic Carbon

The tentative order included effluent monitoring for pyrethroid pesticides, total organic carbon, and dissolved organic carbon. The Discharger comments that the analytical costs for monitoring these constituents are significant for the City of Rio Vista, which has areas classified by the state as disadvantaged and severely disadvantaged communities. The Discharger requested that Central Valley Regional Water Board staff consider the increased financial burden resulting from these additional monitoring requirements.

RESPONSE: Central Valley Water Board staff are understanding of increasing monitoring and analytical costs placed on dischargers, especially as they impact disadvantaged communities. However, monitoring for pyrethroid pesticides along with total and dissolved organic carbon is required by the *Basin Plan Amendment for the Control of Pyrethroid Pesticide Discharges*, effective 22 April 2019. This Basin Plan Amendment established measurable pyrethroid concentration goals and a program of implementation for the control of pyrethroid pesticides that are impacting or could potentially impact aquatic life uses in surface waters in the Sacramento and San Joaquin River watersheds of the Central Valley. If available, the Discharger may elect to participate in a group study for monitoring these constituents as a means of cost savings.

6. Discharge Comment 6: Receiving Water Monitoring Locations Consolidation

The Discharger requests that the Central Valley Water Board consider potentially consolidating receiving water monitoring locations for both the Northwest Treatment Facility and the Beach Wastewater Treatment Facility (Order No. R5-2019-0016) which are both owned and operated by the Discharger. Due to the proximity of the discharge locations, this can provide cost savings for the Discharger.

RESPONSE: Central Valley Water Board staff concur that a single receiving water monitoring location upstream of the Facility suffices for background water quality data for both the Facility and the Beach Wastewater Treatment Facility. Due to the Discharger's participation in the Delta Regional Monitoring Program, the proposed Order does not require regular receiving water monitoring, except an annual ambient temperature sample. In accordance with the State Implementation Policy, the proposed Order requires for the next permit renewal for the Facility, at minimum, one representative ambient background characterization monitoring event for priority pollutant constituents (Appendix A to 40 C.F.R. part 423). Since either site-specific monitoring or data from the Delta

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Regional Monitoring Program may be utilized to characterize the receiving water in the permit renewal, the proposed Order does not specify the location for the ambient background monitoring. Therefore, the proposed order includes sufficient flexibility to coordinate ambient background monitoring with the Beach Wastewater Treatment Facility.