



July 1, 2014

Matthias St. John
Executive Officer
NCRWQCB
5550 Skylane Blvd. #A
Santa Rosa, CA 95403

**LAGUNA SUBREGIONAL WASTEWATER COLLECTION, TREATMENT
AND DISPOSAL FACILITY, NPDES Permit No. CA0022764; WDID No.
1B830990SON**

Subject: Total Phosphorus Effluent Limitation Annual Compliance Report

Dear Mr. St. John:

This report documents compliance with Final Effluent Limit IV.A.2.b.i (no net loading of total phosphorus) as required in Compliance Determination VII.N of Order R1-2013-0001, which specifies the following:

- The Permittee will be determined to be in compliance with the effluent limitation in IV.A.2.b.i if the total phosphorus controlled for the previous three years is greater than or equal to the three-year average of total phosphorus discharged; and
- The Permittee shall document compliance with the effluent limitations in an annual report, submitted to the Regional Water Board by July 1st of each year.

In addition, Attachment B of Order No. R1-2013-0048 specifies that “[t]he first compliance determination will occur in 2017, after conclusion of the 2016-2017 discharge season, using a three-year average from the 2014-2015 discharge season through the 2016-2017 discharge season.”

This report establishes a reporting framework that will be updated by July 1st each year but does not currently evaluate compliance as the report submitted in 2017 will be the first such compliance determination.

Table 1 summarizes credits approved by RWQCB. Credits for the Beretta project were approved by RWQCB on September 20, 2012 based on the City's June 5, 2012 proposal. Although credits were approved, project construction has been delayed as previously reported to you and no credit has been earned. Therefore, the value in the *Validated* column of Table 1 for the Beretta project in 2014 is zero pounds. Credits for the Pepperwood project were approved by RWQCB on October 18, 2012 based on the City's June 28, 2012 proposal. Construction was completed in 2013 and 543.3 credits were earned as described in the third party validation report provided in Table 2 of Attachment 1.

Table 1. Earned Phosphorus Annual Credit Summary (pounds)				
Project	Year	Approved¹	Validated²	3-yr Cumulative Validated
Beretta	2013	294	0	--
Beretta	2014	485		--
Beretta	2015	425		0
Beretta	2016	365		0
Pepperwood	2013	526	543.3	--
Pepperwood	2014	526		--
Pepperwood	2015	526		543.3
Pepperwood	2016	526		0
Total	2013	820	543.3	--
Total	2014	1011	0	--
Total	2015	951	0	543.3
Total	2016	891	0	0
¹ Approved by RWQCB based on City's proposal ² Validation is based on third party inspection. Validated credits are used to determine compliance. Validation report provided in Attachment 1.				

Table 2 summarizes discharge of phosphorus. No discharge occurred in the 2013-2014 discharge season (i.e., October 1, 2013 – May 14, 2014).

Table 2. Total Phosphorus Discharged To Laguna de Santa Rosa				
Discharge Period	Annual Discharge Volume (MG)	Annual Average Total P¹ (mg/l)	Annual TP Discharged (pounds)	3-Yr Cumulative Total P Discharged (pounds)
2013-2014	0	2.7	0	--
2014-2015				--
2015-2016				0
2016-2017				0
¹ as measured in Delta Pond during discharge season				

Table 3 compares the validated credits from Table 1 to the discharged quantity of Total Phosphorus from Table 2. Compliance will be determined first in 2017 and annually thereafter using the three-year comparison of validated credits and discharged phosphorus per Attachment B of Order No. R1-2013-0048.

Table 3. Total Phosphorus Effluent Limitation Compliance Summary			
Discharge Period	3-Yr Cumulative Total P Credits Earned¹	3-Yr Cumulative Discharged Total P²	Balance³
2013-2014	--	--	--
2014-2015	--	--	--
2015-2016	543.3	0	543.3
2016-2017	0	0	0
¹ From Table 1. Credits earned in a calendar year are applied to the following discharge season. For example, credits earned in 2014 are applied to the 2014-2015 discharge season. ² From Table 2. ³ 2017 is the first year of compliance determination. Positive value in <i>Balance</i> column denotes compliance and negative value indicates non-compliance.			

Should you have any questions or comments regarding the above, please contact Rita Miller, Deputy Director of Environmental Services, at (707) 543-3879.

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



David M. Guhin

Director of Utilities

Attachments

1. Credit Verification and Annual Monitoring and Reporting for Pepperwood Preserve Sediment Reduction Project – Letter From Sonoma RCD dated June 30, 2014