

**LATE REVISIONS
CITY OF TRACY
WASTEWATER TREATMENT PLANT
SAN JOAQUIN COUNTY**
**Consideration of NPDES Permit Renewal (NPDES No. CA0079154)
Regional Water Quality Control Board, Central Valley Region
7 December 2012 Board Meeting
ITEM # 19 -**

Part I – Late Revisions to NPDES Permit to Modify Limits for Copper and Clarify Monitoring Requirements and Fact Sheet Rationale

1. Limitations and Discharge Requirements – Effluent Limitations and Discharge Specifications. Section IV.A.1.a. Table 6 Effluent Limitations

Modify Table 6 to add an average monthly effluent limitation for copper, as shown in underline/strikeout format below:

Table 6. Effluent Limitations

| Parameter | Units | Effluent Limitations | | | | |
|----------------------------|-------|----------------------|----------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Average Weekly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| Copper (total recoverable) | µg/L | <u>15</u> | -- | 10.4 | -- | -- |

2. Monitoring and Reporting Program. - Section VIII.A.1. Table E-5. Receiving Water Monitoring Requirements

Modify Table E-5 to remove the receiving water monitoring for total phosphorus, total Kjeldahl nitrogen, and total organic carbon, as shown in underline/strikeout format below. The monitoring for these constituents has been added to Attachment I – Effluent and Receiving Water Characterization Study:

Table E-5. Receiving Water Monitoring Requirements

| Parameter | Units | Sample Type | Minimum Sampling Frequency | Required Analytical Test Method |
|---|-------|-------------|----------------------------|---------------------------------|
| Total Phosphorus | mg/L | Grab | 1/Quarter | |
| Total Kjeldahl Nitrogen (as N) [†] | mg/L | Grab | 1/Quarter | |
| Total Organic Carbon [†] | mg/L | Grab | 1/Quarter | |

3. Monitoring and Reporting Program. - Section X.D.3. Other Reports.

Modify section IX.D.3 to provide clarification, as shown in underline/strikeout format below:

3. Within 60 days of permit adoption, the Discharger shall submit a report outlining reporting levels (RLs), method detection limits, and analytical methods for approval, ~~with a goal to achieve detection levels below applicable water quality criteria.~~ The Discharger shall comply with the monitoring and reporting requirements for CTR

constituents as outlined in section 2.3 and 2.4 of the SIP. The maximum required reporting levels for priority pollutant constituents shall be based on the minimum levels (MLs) contained in Appendix 4 of the SIP, determined in accordance with Section 2.4.2 and 2.4.3 of the SIP. In accordance with Section 2.4.2 of the SIP, when there is more than one ML value for a given substance, the Central Valley Water Board shall include as RLs, in the permit, all ML values, and their associated analytical methods, listed in Appendix 4 that are below the calculated effluent limitation. The Discharger may select any one of those cited analytical methods for compliance determination. If no ML value is below the effluent limitation, then the Central Valley Water Board shall select as the RL, the lowest ML value, and its associated analytical method, listed in Appendix 4 for inclusion in the permit. Table I-1 (Attachment I) provides required maximum reporting levels in accordance with the SIP.

4. Monitoring and Reporting Program. - Section IX.D.5. Effluent and Receiving Water Characterization Study.

Modify section IX.D.5 to modify the monitoring frequency for dioxin and furans, as shown in underline/strikeout format below:

1. **Effluent and Receiving Water Characterization Study.** An effluent and receiving water monitoring study is required to ensure adequate information is available for the next permit renewal. During the third year of this permit term, the Discharger shall conduct **bi-monthly** monitoring of the effluent at EFF-001 and of the receiving water at RSW-001 for all priority pollutants and other constituents of concern as described in Attachment I. To complete the SIP requirements for Dioxin and Furan monitoring, during the term of this Order Dioxin and Furan sampling shall be performed only twice for three consecutive years during dry weather during the year, as described in Attachment J. The report shall be completed in conformance with the following schedule.

| <u>Task</u> | <u>Compliance Date</u> |
|---|---|
| i. Submit Work Plan and Time Schedule | <u>1 January 2014</u> No later than 2 years 6 months from adoption of this Order |
| ii. Conduct <u>bi-monthly⁴ monitoring for all constituents listed in Table I-1 (Attachment I)</u> | During third or fourth year of permit term |
| iii. <u>Conduct three consecutive years of dioxin and furans dry weather monitoring (Attachment J)</u> | <u>During the term of this Order</u> |
| iv. Submit Final Report | 6 months following completion of final monitoring event |
| ⁴ Dioxin and Furan sampling shall be performed only twice during the year as described in Attachment J. | |

5. Fact Sheet. - Section III.C.7. Emergency Planning and Community Right to Know Act

Modify the second paragraph of section III.C.7. to provide clarification, as shown in underline/strikeout format below:

The Central Valley Water Board has adopted numeric water quality objectives in the Basin Plan for the following constituents: arsenic, chlorpyrifos, copper, diazinon, iron, and manganese. As detailed elsewhere in this Permit, available effluent quality data indicate that of these constituents, none of these constituents have only copper has a reasonable potential to cause or contribute to an excursion above any numeric water quality objectives included within the Basin Plan or in any State Water Board plan.

6. Fact Sheet. Section IV.A.4. Discharge Prohibitions

Modify section IV.A.4. to provide clarification, as shown in underline/strikeout format below:

5. **Prohibition III.D (No inclusion of pollutant free wastewater shall cause improper operation of the Facility's systems).** This prohibition is based on CFR Part 122.41 et seq. that requires the proper design and operation of treatment facilities. The Discharger has proposed to reduce its salinity loading to the Delta through operation of a desalination plant, which would result in the return of pollutant free wastewater to the Facility. Prohibition III.D does not prohibit the return of pollutant free wastewater from the desalination plant, provided the Discharger demonstrates the pollutant-free wastewater does not affect the system's ability to comply with this Order.

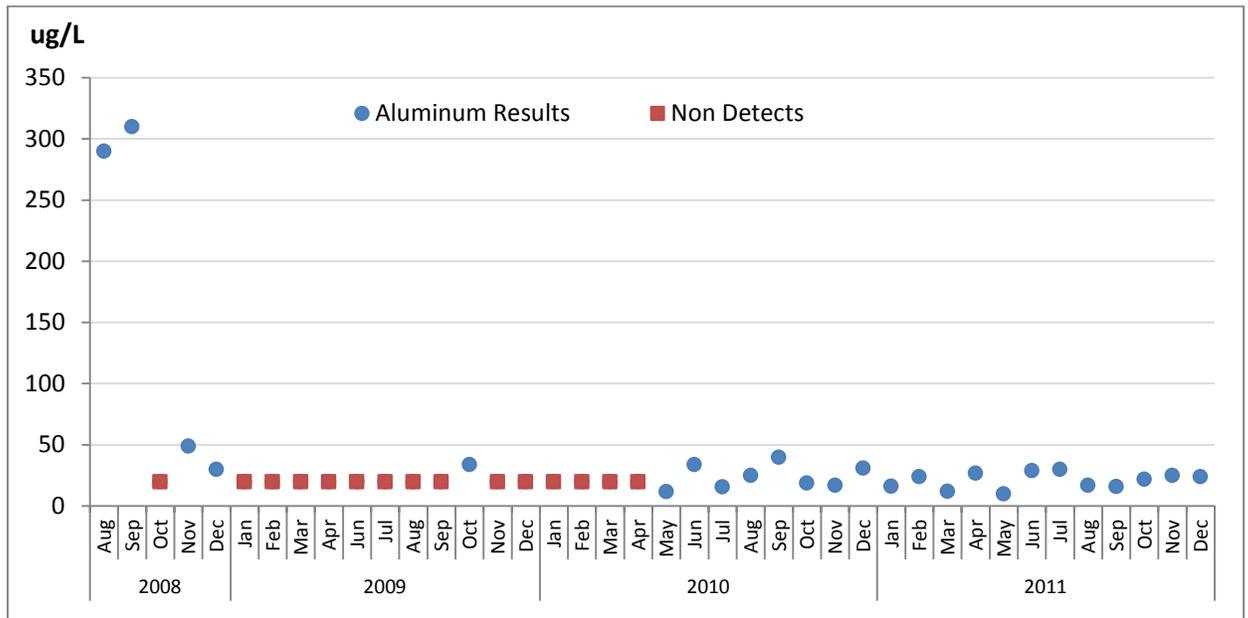
7. Fact Sheet. Section IV.C.3.c.i.(b) Aluminum, RPA Results.

Modify the last paragraph of section IV.C.3.c.i.(a) and section IV.C.3.c.i.(b) to clarify the reasonable potential analysis results for aluminum, as shown in underline/strikeout format below:

Based on ~~best professional~~ its judgment considering the site-specific conditions of the receiving water (e.g., hardness and pH), the Modesto Phase I WER Study, and the Manteca Phase II WER Study, the Central Valley Water Board finds that the NAWQC chronic criterion for aluminum is overly stringent and should not be used to interpret the narrative toxicity objective for this discharge. Therefore, the ~~USEPA's NAWQC acute criterion for the protection of freshwater aquatic life, and the DPH Secondary MCL for aluminum were~~ was used to conduct the reasonable potential analysis for aluminum.

(b) RPA Results. The ~~MEG maximum effluent concentration~~ for aluminum was 49 µg/L, based on 39 samples collected between August 2008 and December 2011. The maximum annual average effluent concentration for aluminum was 21 µg/L based on 2009, 2010 and 2011 calendar years. Two effluent samples

collected on 5 August 2008 (290 µg/L) and 10 September 2008 (310 µg/L) were deemed to be outliers and non-representative of the discharge, thus were not used in the RPA. The figure below clearly demonstrates the two samples identified above are not representative of the discharge, because the data points are significantly different than the remaining dataset.



The maximum observed upstream receiving water aluminum concentration was 1900 µg/L, and the maximum annual average concentration was 955 µg/L, based on 15 samples collected between July 2008 and October 2011.

| Secondary MCL | Annual Average Aluminum Concentrations | |
|---------------|--|-----------|
| | Tracy Effluent | Old River |
| 200 µg/L | 21 µg/L | 955 µg/L |

For priority pollutants, the SIP dictates the procedures for conducting the RPA. Aluminum is not a priority pollutant. Therefore, the Central Valley Water Board is not restricted to one particular RPA method. Due to the site-specific conditions of the discharge, the Central Valley Water Board has used ~~best professional~~ its judgment in determining the appropriate method for conducting the RPA for this non-priority pollutant constituent.

The most stringent objective is the Secondary MCL, which is derived from human welfare considerations (e.g., taste, odor, laundry staining), not for toxicity. Although the receiving water contains aluminum exceeding the Secondary MCL, the receiving water is not listed on the 303(d) list for aluminum, and aluminum is not a constituent of concern in the development of the Drinking Water Policy. Additionally, the effluent aluminum is consistently less than the concentrations in the receiving water and below the Secondary

MCL. Therefore, the Central Valley Water Board finds the discharge does not have reasonable potential to cause or contribute to an exceedance in the receiving water and the Facility is adequately controlling the discharge of aluminum.

Order R5-2007-0036-01 included an annual average final effluent limit of 200 µg/L, an AMEL of 462 µg/L, and an MDEL of 755 µg/L. Since there is no reasonable potential these effluent limits have not been retained in this Order. Removal of these effluent limitations is in accordance with federal antibacksliding regulations (see section IV.D.3 of the Fact Sheet).

8. Fact Sheet. Section IV.C.3.c.iii.(b) Iron, RPA Results.

Modify the first three paragraphs of section IV.C.3.c.iii.(b) to clarify the reasonable potential analysis results for iron, as shown in underline/strikeout format below:

(b) RPA Results. The ~~MEC~~ maximum effluent concentration for iron was 54 µg/L based on 42 samples collected between August 2008 and December 2011. The maximum annual average effluent concentration for iron was 28 µg/L based on 2009, 2010 and 2011 calendar years. The maximum observed iron concentration in the receiving water was 4000 µg/L in 15 samples collected August 2008 and October 2011, and the maximum annual average concentration was 1833 µg/L based on 2009, 2010 and 2011 calendar years.

| <u>Iron</u> | <u>Basin Plan (Delta)</u> | <u>Secondary MCL</u> | <u>Tracy Effluent</u> | <u>Old River Receiving Water</u> |
|------------------------------|-----------------------------|-----------------------------|-----------------------|----------------------------------|
| <u>Maximum Concentration</u> | <u>300 µg/L¹</u> | <u>--</u> | <u>54 µg/L</u> | <u>4000 µg/L</u> |
| <u>Annual Average</u> | <u>--</u> | <u>300 µg/L²</u> | <u>28 µg/L</u> | <u>1833 µg/L</u> |

¹Maximum copper concentration expressed as dissolved metal.

²Annual average expressed as total recoverable metal.

For priority pollutants, the SIP dictates the procedures for conducting the RPA. Iron is not a priority pollutant. Therefore, the Central Valley Water Board is not restricted to one particular RPA method. Due to the site-specific conditions of the discharge, the Central Valley Water Board has used ~~best professional~~ its judgment in determining the appropriate method for conducting the RPA for this non-priority pollutant constituent.

The most stringent objective is the Secondary MCL, which is derived from human welfare considerations (e.g., taste, odor, laundry staining), not for toxicity. Although the receiving water contains iron exceeding the Secondary MCL, the receiving water is not listed on the 303(d) list for iron, and iron is not a constituent of concern in the development of the Drinking Water Policy. Additionally, the effluent iron is consistently less than the concentrations in the receiving water and below the Secondary MCL applicable water quality objective. Therefore, the Central Valley Water Board finds the discharge does not have reasonable potential to cause or

contribute to an exceedance in the receiving water and the Facility is adequately controlling the discharge of iron.

9. Fact Sheet. Section IV.C.3.c.iv.(b) Manganese, RPA Results.

Modify the first three paragraphs of section IV.C.3.c.iv.(b) to clarify the reasonable potential analysis results for manganese, as shown in underline/strikeout format below:

(b) RPA Results. The ~~MEC~~ maximum effluent concentration for manganese was 20 µg/L based on 42 samples collected between August 2008 and December 2011. The maximum annual average effluent concentration for manganese was 5 µg/L based on 2009, 2010 and 2011 calendar years. The maximum observed manganese concentration in the receiving water was 290 µg/L in 15 samples collected between August 2008 and October 2011, and the maximum annual average concentration was 147 µg/L based on 2009, 2010 and 2011 calendar years.

| <u>Manganese</u> | <u>Basin Plan (Delta)</u> | <u>Secondary MCL</u> | <u>Tracy Effluent</u> | <u>Old River Receiving Water</u> |
|------------------------------|---------------------------|----------------------|-----------------------|----------------------------------|
| <u>Maximum Concentration</u> | <u>50 µg/L</u> | -- | <u>20 µg/L</u> | <u>290 µg/L</u> |
| <u>Annual Average</u> | -- | <u>50 µg/L</u> | <u>5 µg/L</u> | <u>147 µg/L</u> |

For priority pollutants, the SIP dictates the procedures for conducting the RPA. Manganese is not a priority pollutant. Therefore, the Central Valley Water Board is not restricted to one particular RPA method. Due to the site-specific conditions of the discharge, the Central Valley Water Board has used ~~best professional judgment~~ best professional judgment in determining the appropriate method for conducting the RPA for this non-priority pollutant constituent.

The most stringent objective is the Secondary MCL, which is derived from human welfare considerations (e.g., taste, odor, laundry staining), not for toxicity. Although the receiving water contains manganese exceeding the Secondary MCL, the receiving water is not listed as impaired on the 303(d) list for manganese, and manganese is not a constituent of concern in the development of the Drinking Water Policy. Additionally, the effluent manganese concentrations are ~~is~~ consistently less than the concentrations in the receiving water and below the Secondary MCL applicable water quality objective. Therefore, the Central Valley Water Board finds the discharge does not have reasonable potential to cause or contribute to an exceedance in the receiving water and the Facility is adequately controlling the discharge of manganese.

10. Fact Sheet. Section IV.C.3.d.v. Copper, Total Recoverable

Modify section IV.C.3.d.v to provide clarification of the reasonable potential analysis for copper and correct the derivation of water quality-based effluent limitations, as shown in underline/strikeout format below:

v. Copper

- (a) **WQO.** The CTR includes hardness-dependent criteria for the protection of freshwater aquatic life for copper. These criteria for copper are presented in dissolved concentrations, as 1-hour acute criteria and 4-day chronic criteria. USEPA recommends conversion factors to translate dissolved concentrations to total concentrations. Default USEPA translators (i.e., 0.96 for acute and chronic criteria) were used for the receiving water and effluent.

The Basin Plan (BP) includes a site-specific objective for the Sacramento-San Joaquin Delta of 10 µg/L (dissolved) as a maximum concentration. Using the default USEPA translator, the BP objective is 10.4 µg/L (total recoverable).

Footnote 4, page 3, of the Introduction of the SIP states, "If a water quality objective and a CTR criterion are in effect for the same priority pollutant, the more stringent of the two applies." ~~You cannot directly compare t~~The BP objective and cannot be directly compared to the CTR criteria to determine which is the most stringent objective because they have different averaging periods and the CTR criteria vary with hardness ~~while the BP objective does not.~~ In this situation, the RPA has been conducted considering both the CTR criteria and the BP water quality objectives.

- (b) **RPA Results.** Section IV.C.2 of this Fact Sheet includes procedures for conducting the RPA for hardness-dependent CTR metals, such as copper. The CTR includes hardness-dependent criteria for copper for the receiving water. The maximum observed upstream receiving water copper concentration was 7 µg/L, based on 18 samples collected between July 2008 and October 2011. The RPA was conducted using the upstream receiving water hardness to calculate the criteria for ~~comparing~~comparison to the maximum ambient background concentration, and likewise using the reasonable worst-case downstream hardness ~~comparing to~~compare the maximum effluent concentration. The table below shows the specific criteria used for the RPA.

| | CTR <u>Hardness Dependent</u> Chronic Criteria æ (Total Recoverable) | Site-Specific BP Objective (Total Recoverable) | Maximum Concentration | Reasonable Potential? (Y/N) |
|-----------------|--|---|------------------------------|--------------------------------|
| Receiving Water | 3.8 µg/L ¹ | 10.4 µg/L | <u>7.0</u> µg/L ⁵ | Yes ³ |
| Effluent | 17 µg/L ² | 10.4 µg/L | 5.9 µg/L ⁴ | No |

¹ Based on lowest observed upstream hardness of 35 mg/L (as CaCO₃)

² Based on reasonable worst-case downstream hardness of 200 mg/L (as CaCO₃)

³ Maximum ambient background concentration exceeds CTR chronic criterion, but not BP objective.

⁴ Maximum observed effluent copper concentration, from May 2010 through December 2011, after the interim effluent limitation of 19 µg/L expired.

⁵ Maximum observed background receiving water copper concentration, from July 2008 through October 2011.

Based on the available data, the discharge has reasonable potential to cause or contribute to an exceedance of the CTR criterion in the receiving water, but the discharge does not demonstrate reasonable potential for the site-specific Basin Plan objective. Consequently, WQBELs are required for copper.

(c) WQBELs. In accordance with the SIP, the more stringent of the two applicable criteria, the CTR criteria and the BP objective, was used to determine reasonable potential. Although reasonable potential was triggered only by the CTR criteria, the resulting WQBELs that are calculated based on the CTR criteria result in WQBELs exceeding the BP Objective (see table below).

| <u>WQBELs</u> | <u>Average Monthly Effluent Limit (AMEL)</u> | <u>Maximum Daily Effluent Limit (MDEL)</u> |
|---|--|--|
| <u>CTR Chronic Criterion (Aquatic Life)</u> | <u>15 µg/L</u> | <u>25 µg/L</u> |
| <u>Basin Plan Objective¹</u> | <u>--</u> | <u>10.4 µg/L</u> |

¹ Fourth Edition of the Water Quality Control Plan (Basin Plan) for the Sacramento River and San Joaquin River Basins, Table III-1, Copper. Applicable to the Sacramento-San Joaquin Delta, Appendix 42 Waterways, 86. Old River.

Consequently, the WQBELs have been developed using the BP Objective resulting in a MDEL of 10.4 µg/L (total recoverable), which is consistent with the previous Order. ~~Federal regulations require that, unless impracticable, effluent limitations for POTWs are to be established as average weekly and average monthly. The SIP requires average monthly and maximum daily effluent limits for CTR constituents. The site-specific objective for copper is established as a maximum concentration. Therefore, it is impracticable to calculate average weekly and average monthly effluent limitations for copper using the BP objective. Therefore, an average monthly effluent limitation of 15 µg/L was calculated using the CTR criteria. A MDEL has been established to implement the site-specific objective. This Order includes a MDEL of 10.4 µg/L and an AMEL of 15 µg/L, as total recoverable copper.~~

11. Fact Sheet. Section IV.C.4. WQBEL Calculations

Modify Table F-12 to include an average monthly effluent limitation for Copper, Total Recoverable, as shown in underline/strikeout format below:

**Summary of Water Quality-Based Effluent Limitations
 Discharge Point No. 001 and Discharge Point No. 002**

Table F-12. Summary of Water Quality-Based Effluent Limitations

| Parameter | Units | Effluent Limitations | | | | |
|----------------------------|-------|----------------------|----------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Average Weekly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| Copper (total recoverable) | µg/L | <u>15</u> | -- | 10.4 | -- | -- |

12. Fact Sheet. Section IV.D.5. Stringency of Requirements for Individual Pollutants

Modify Table F-15 to include an average monthly effluent limitation for Copper, Total Recoverable, as shown in underline/strikeout format below:

**Summary of Final Effluent Limitations
 Discharge Point No. 001 and Discharge Point No. 002**

Table F-15. Summary of Final Effluent Limitations

| Parameter | Units | Effluent Limitations | | | | | Basis ¹ |
|---------------------------|-------|----------------------|----------------|---------------|-----------------------|-----------------------|---------------------------|
| | | Average Monthly | Average Weekly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum | |
| Copper, Total Recoverable | µg/L | <u>15</u> | -- | 10.4 | -- | -- | <u>CTR, B</u> <u>P</u> |

¹ PF – Based on permitted flow of the Facility ranging from 10.8 MGD to 16 MGD to coincide with phased upgrade project.
 TTC – Based on tertiary treatment capability. These effluent limitations reflect the capability of a properly operated tertiary treatment plant.
 CFR – Based on secondary treatment standards contained in 40 CFR Part 133.
 BP – Based on water quality objectives contained in the Basin Plan.
 CTR – Based on water quality criteria contained in the California Toxics Rule and applied as specified in the SIP.
 NAWQC – Based on USEPA's National Ambient Water Quality Criteria for the protection of freshwater aquatic life.
 SEC MCL – Based on the Secondary Maximum Contaminant Level.
 TMDL – Based on the TMDL for salinity and boron in the lower San Joaquin River.
 MCL – Based on the Primary Maximum Contaminant Level.
 Title 22 – Based on CA Department of Public Health Reclamation Criteria, CCR, Division 4, Chapter 3 (Title 22).

13. Fact Sheet. Section VI.E.3. Effluent and Receiving Water Characterization Study.

Modify section VI.E.3 to modify the monitoring frequency for dioxin and furans, as shown in underline/strikeout format below:

An effluent and receiving water monitoring study is required to ensure adequate information is available for the next permit renewal. During the third or fourth year of this permit term, the Discharger is required to conduct monthly monitoring of the effluent at EFF-001 and of the receiving water at RSW-001 for all priority pollutants and other constituents of concern as described in Attachment I. During the term of this Order, Dioxin and furan sampling shall be performed ~~twice during the year~~ for three consecutive years during dry weather, as described in Attachment J.

14. Fact Sheet. Section VII.B.7. Compliance Schedules

Modify paragraph one of section VII.B.7.a. to provide clarification, as shown in underline/strikeout format below:

7. Compliance Schedules

- a. Compliance Schedule for Methylmercury.** The State Water Board adopted the Policy for Compliance Schedules in National Pollutant Discharge Elimination System Permits (Resolution 2008-0025), which is the governing Policy for compliance schedules in NPDES permits (hereafter “Compliance Schedule Policy”). In accordance with the Compliance Schedule Policy and 40 C.F.R. § 122.47, A a Discharger who seeks a compliance schedule must demonstrate additional time is necessary to implement actions to comply with a more stringent permit limitation. The Discharger must provide the following documentation as part of the application requirements:

15. Fact Sheet. Section VII.B.7. Compliance Schedules

Modify paragraphs five and six of section VII.B.7.a. to provide clarification, as shown in underline/strikeout format below:

Phase 2 begins after the Phase 1 Delta Mercury Control Program Review or by 20 October 2022, whichever occurs first, and ends in 2030. During Phase 2, dischargers shall implement methylmercury control programs and continue inorganic (total) mercury reduction programs. Compliance monitoring and implementation of upstream control programs also shall occur in Phase 2. Any compliance schedule contained in an NPDES permit must be “...an enforceable sequence of actions or operations leading to compliance with an effluent limitation...” per the definition of a compliance schedule in CWA Section 502(17). See also 40 C.F.R. § 122.2 (definition of schedule of compliance). The compliance schedule for methylmercury meets these requirements. Federal Regulations at 40 C.F.R. § 122.47(a)(1) requires that, “Any schedules of compliance under this section shall require compliance as soon as possible...”

The Compliance Schedule Policy also requires that compliance schedules are as short as possible and may not exceed 10 years, except when “...*a permit limitation that implements or is consistent with the waste load allocations specified in a TMDL that is established through a Basin Plan amendment, provided that the TMDL implementation plan contains a compliance schedule or implementation schedule.*” As discussed above, the Basin Plan’s Delta Mercury Control Program includes compliance schedule provisions and allows compliance with the waste load allocations for methylmercury by 2030. Until the Phase 1 Control Studies are complete and the Central Valley Water Board conducts the Phase 1 Delta Mercury Control Program Review, it is not possible to determine the appropriate compliance date for the Discharger that is as soon as possible. Therefore, this Order establishes a compliance schedule for the new, final, WQBELs for methylmercury with full compliance required by **31 December 2030**, which is consistent with the Final Compliance Date of the TMDL. At completion of the Phase 1 Delta Mercury Control Program Review, the final compliance date for this compliance schedule will be re-evaluated to ensure compliance is required as soon as possible. Considering the available information, the compliance schedule is as short as possible in accordance with federal regulations and the Compliance Schedule Policy.

16.Attachment H. Calculation of WQBELS

Modify table to add water quality-based effluent limit calculations for copper, as shown in underline/strikeout format below:

| Parameter | Units | Most Stringent Criteria | | | Dilution Factors | | | HH Calculations | | | Aquatic Life Calculations | | | | | | | | Final Effluent Limitations | | |
|--------------------------------|-------|-------------------------|-------------------|------|------------------|-----|-----|--|------------------------------------|--------------------|---------------------------------|----------------------|-----------------------------------|------------------------|--------------|-------------------------------|--------------------|-------------------------------|----------------------------|-------------|-------------------|
| | | HH | CMC | CCC | HH | CMC | CCC | ECA _{HH} = AMEL _{HH} | AMEL/MDEL Multiplier _{HH} | MDEL _{HH} | ECA Multiplier _{acute} | LTA _{acute} | ECA Multiplier _{chronic} | LTA _{chronic} | Lowest LTA | AMEL Multiplier ₉₅ | AMEL _{AL} | MDEL Multiplier ₉₉ | MDEL _{AL} | Lowest AMEL | Lowest MDEL |
| Ammonia Nitrogen, Total (as N) | mg/L | -- | 2.14 | 1.42 | -- | -- | -- | -- | -- | -- | 0.54 | 1.2 | 0.89 | 1.3 | 1.2 | 1.13 | 1.3 | 1.84 | 2.1 | 1.3 | 2.1 |
| Bis (2-ethylhexyl) phthalate | µg/L | 1.8 | -- | -- | 7.5:1 | -- | -- | 12.19 | 3.99 | 48.7 | -- | -- | -- | -- | -- | -- | -- | -- | -- | 12 | 49 |
| Copper (total recoverable) | µg/L | -- | 10.4 ¹ | -- | -- | -- | -- | -- | -- | -- | <u>0.44</u> | <u>11.9</u> | <u>0.65</u> | <u>10.91</u> | <u>10.91</u> | <u>1.36</u> | <u>15</u> | <u>2.26</u> | <u>25</u> | <u>15</u> | 10.4 ¹ |
| Chlorodibromomethane | µg/L | 0.41 | -- | -- | 20:1 | -- | -- | 8.01 | 2.21 | 18 | -- | -- | -- | -- | -- | -- | -- | -- | -- | 8 | 18 |
| Dichlorobromomethane | µg/L | 0.56 | -- | -- | 20:1 | -- | -- | 10.56 | 2.19 | 23 | -- | -- | -- | -- | -- | -- | -- | -- | -- | 11 | 23 |

¹ A more stringent MDEL of 10.4 µg/L is established in this Order based on the Basin Plan Objective (see Section IV.c.3.d.iv of the Fact Sheet for a detailed discussion).

17. Attachment I. Section II.B. Effluent and Receiving Water Characterization Study

Modify language to modify the monitoring frequency for dioxin and furans, as shown in underline/strikeout format below:

B. ~~Semi-annual~~ Semi-Annual Dry Weather Monitoring (dioxins and furans only). ~~Semi-annual~~ Annual dry weather monitoring is required during the term of this Order for three consecutive years for dioxins and furans, as specified in Attachment J. The results of dioxin and furan monitoring shall be submitted to the Central Valley Water Board with the monitoring data discussed in subsection A, above.

18. Attachment I. Table I-1. Priority Pollutants and Other Constituents of Concern

Modify table to add the following constituents, as shown in underline/strikeout format below:

| CTR # | Constituent | CAS Number | Maximum Reporting Level ¹ µg/L or noted |
|-------|--|------------|---|
| | <u>Total Organic Kjeldahl Nitrogen</u> | | |
| | <u>Total Organic Carbon</u> | | |
| | <u>Dissolved Organic Carbon</u> | | |

¹ The reporting levels required in these tables for priority pollutant constituents are established based on Section 2.4.2 and Appendix 4 of the SIP.

19. Attachment J. Dioxin and Furan Sampling

Modify paragraph two to modify the monitoring frequency for dioxin and furans, as shown in underline/strikeout format below:

The Discharger shall conduct effluent and receiving water monitoring for the 2,3,7,8-TCDD congeners listed above to assess the presence and amounts of the congeners being discharged and already present in the receiving water. Effluent and upstream receiving water shall be monitored for the presence of the 17 congeners once annually during dry weather ~~and once during wet weather for 1 year within the term of the study~~ for three consecutive years.

Part II – Late Revisions to NPDES Permit to Correct Typographical Errors

20. Fact Sheet. Section IV.C.3.d.iii. Chlorine, Total Residual

Modify section IV.C.3.d.iii to correct typographical errors as shown in underline/strikeout format below. Similar corrections have been made to section IV.C.3.d.i Ammonia, section IV.C.3.d.ix Nitrate and Nitrite, section IV.C.3.d.xi pH, section IV.C.3.d.xiv Temperature, and section IV.C.5.a Acute Toxicity.

- (b) RPA Results.** Federal regulations at 40 C.F.R. §122.44(d)(1)(i) requires that, *“Limitations must control all pollutants or pollutant parameters (either conventional, nonconventional, or toxic pollutants) which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality.”* For priority pollutants, the SIP dictates the procedures for conducting the RPA. ~~Ammonia~~Chlorine is not a priority pollutant. Therefore, the Central Valley Water Board is not restricted to one particular RPA method. Due to the site-specific conditions of the discharge, the Central Valley Water Board has used ~~best professional~~ its judgment in determining the appropriate method for conducting the RPA for this non-priority pollutant constituent.