Items XX
Response to Comments
for
Tentative Order Dated July 30, 2008

City of Oxnard
Groundwater Enhancement and Treatment Program – Nonpotable Reuse Phase I Project for Oxnard Wastewater Treatment Plant
Tentative Water Recycling and Waste Requirements Permit

(The following Table summarizes the comments received from interested parties with regard to the above-mentioned facilities' Tentative Permit.)

No.	Comment	Agree	Disagree	Response to Comment	Action Taken
Letter from City of Oxnard Dated on August 25, 2008					
1.	The City of Oxnard cannot meet the March 31, 2009, deadline of submitting the report to the Regional Board and the CDPH that demonstrates equivalency of UV/AOX disinfection to chlorine disinfection as used in recycled water treatment plant.	X		The recycled water is planned to be delivered to the users in January 2012. Therefore, the Regional Board staff agree to modify the deadline, which is March 31, 2011 instead of March 31, 2009.	Change has been made.
Letter from Heal the Bay Dated on August 27, 2008					
1.	As a general comment, the WDRs should be consistent with the State Water Board's Water Reuse Policy. A draft of the Policy is currently available and will be discussed at the September 2nd State Water Board hearing.		X	The provisions and requirements of this proposed tentative permit are much more stringent than those specified in the draft State Water Board's Water Reuse Policy, because the draft State Water Board's Water Reuse Policy is designed for regulating uses of tertiary-treated recycled water. This recycled water will have advanced treatment through MF/UF/RO plus UV/oxidation, and is not expected to contain contaminants that would adversely impact water quality.	None necessary.
2.	**Great Program Sub-Projects** The WDRs mention that two additional GREAT Program sub-projects will be covered under future permits. How soon will the subsequent phases of this project be developed and permitted? Will these sub-projects be pursued only after the 31.25 mgd is recycled under the proposed project?			Neither Regional Board staff nor the City of Oxnard's staff has the timelines for developing and permitting the subsequent Phase II project and additional two sub-projects at this time. We also do not know whether these sub-projects will be pursued only after the 31.25 mgd (31.25 mgd is not a correct number. It should be 25 mgd.) is recycled under the proposed projects. The City of Oxnard predicts that the 6.25 mgd MF/UF/RO treated high quality	Non necessary.

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				recycled water will be produced by January 2012. By that time, the City of Oxnard will be able to provide the timelines for these projects.	
	Brine disposal can be a big water quality issue with the groundwater desalination project. Where will this brine be discharged? It is vital that this discharge does not degrade the water quality of inland waterways or coastal waters.	X		Regional Board staff agree that the brine disposal can be a big water quality issue with the groundwater desalination project. The City will discharge the brine through the current ocean outfall or marsh wetlands. For this special project, the City will be required to conduct special studies in order to obtain information of whether the brine disposal adversely affects the receiving water quality.	Non necessary.
3.	**<u>Recycled Water Monitoring and Groundwater Monitoring</u>** The monitoring and reporting program (MRP) requires effluent monitoring of endocrine disrupting chemicals, pharmaceuticals and other emerging contaminants every five years. This frequency is not enough to adequately determine the presence of these pollutants and capture variability. Instead, these contaminants should be monitored every year in the effluent. Less frequent monitoring is needed for groundwater unless emerging contaminants are found in significant concentrations in the effluent. This is consistent with the proposed water recycling policy from the multi-stakeholder negotiation group.	X		Regional Board staff agree to modify the effluent monitoring frequency for these constituents to annually.	Change has been made.
	The MRP includes a statement that the discharger must submit a map that "clearly identifies the locations of all monitoring wells, and production wells." (MRP at T-2). However, there is no mention of groundwater monitoring requirements in the MRP. Regular monitoring of groundwater should take place to determine if water quality has been compromised due to water recycling discharge. We recommend quarterly monitoring of groundwater for nutrients and salts, especially given that the recycled water limitation for total nitrogen is high at 10 mg/L. Of note, this is also consistent with the draft Water Reuse Policy mentioned above.	X		This is a typographic error. The monitoring wells have been deleted. Based upon the City of Oxnard's *2008 Title 22 Engineering Report for the Oxnard GREAT Program*, all constituents' concentrations, including total nitrogen and salts of the MF/UF/RO treated recycled water, are below ambient concentrations in the aquifers beneath the agricultural areas. Therefore, the groundwater monitoring is not necessary for this project. However, for the upcoming Groundwater Injection Project, an intensified groundwater monitoring program will be required.	Change has been made.

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4.	**<u>Antidegradation</u>** Although the reuse of water for irrigation purposes has benefits for water supply security, such practices may degrade the quality of groundwater supplies. What provisions will be made to assure that there is no degradation of groundwater resources, as is required in State Water Board Resolution No. 68-16? Activities involving the disposal of waste that could impact high quality waters must implement best practicable treatment or control of the discharge necessary to ensure that degradation will not occur.		X	The GREAT Program's recycled water is treated through the advanced technology of MF/UF/RO and UV disinfection, and is essentially the best practicable treatment and control for pollutants. Nutrients and salts will essentially be removed by this treatment. Therefore, degradation of the underlying groundwater is not a concern, and the discharge will be in conformance with the State's Antidegradation Policy.	Non necessary.