

**Response to Comments Received
Regarding the Tentative NPDES Orders
For
Camarillo Sanitary District, City of Thousand Oaks, and the City of Simi Valley**

Subject	#	Comment	Agree	Disagree	Reply	Action taken
Comments Received on May 5, 2008 from Camarillo Sanitary District, the City of Thousand Oaks, and the City of Simi Valley Regarding the Tentative Dated April 3, 2008						
Grammatical errors & typographical errors	1	Camarillo SD requests that the grammatical omission in the Notice of Public Hearing, page 2 be corrected, by adding the word "Neither" at the beginning.	X		The text was added.	Added text
Attachment	2	Camarillo SD & City of Thousand Oaks pointed out that not all of the attachments were referred to in the finding, in the last sentence in Section 8 II. D and requested that Attachments A through I be listed.	X		Attachment I was included, but a new Attachment K was also added.	Mentioned all attachments
Footnote	3	Camarillo SD & City of Thousand Oaks request that Footnote #2 be added to chloride, in Table 6a.		X	The 150 mg/L Basin Plan WQO was replaced by the USEPA Chloride Waste Load Allocation, so the footnote does not apply to chloride.	None necessary
Mass-based WLA	4	Camarillo SD & City of Thousand Oaks requested that the mass-based final waste load allocations for total recoverable copper and nickel from the Metals TMDL be included in Table 6a.	X		They were added.	Added mass-based WLAs
Effective date of TMDL	5*	Camarillo SD & City of Thousand Oaks suggests that the concentration limits in Table 6a be maintained; that a footnote be added to Table 6a for the TMDL mass limits stating the limit and when it will become effective; and that the interim limits for copper and nickel in Table 7 be removed.	X		The TMDL-based mass limits cannot be removed, but language was added to the footnote explaining when the limits become operative. The interim limits for copper & nickel were deleted as requested.	Deleted interim limits
Limit Comparison Table	6*	Camarillo SD requested that a comparison of the following be added in Table 6a or in a new table: actual performance, current effluent limits, and proposed effluent limits.		X	The limit comparison table has always been included in the Board's agenda package, not as part of the Order. We can share that document with the Discharger once the	None necessary

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					agenda package has been prepared.	
Table format	7	The Dischargers requested that a separate line for the TMDL limits in Table 6a be added, rather than putting that information in a separate Table 6b.	X		Table 6b was deleted and the information was included in Table 6a.	Reformatted tables
Salts TMDL footnotes	8	Table 6a should include a footnote for the current limits that the interim chloride, TDS, and sulfate effluent limits in Table 7 are intended to supersede the Basin Plan limits for TDS and Sulfate and the 2002 Chloride TMDL-based chloride effluent limits upon the effective date of the Salts TMDL.	X		The footnotes were modified.	Added language to footnotes
Salts final WLA formula error	10	The formula used in Table 6b (and Table F-6) for the mass-based TDS, sulfate, and chloride AMELs is incorrectly written: The formula should read as follows: $850Q - AF$ for TDS, etc., instead of $850 \times (Q-AF)$.	X		The parenthesis was removed.	Corrected formula
Toxicity	9	Table 6A in the Tentative Order proposes a toxicity “limit” of 1.0 TUc as a monthly average. Table 6A footnote 13 clarifies that the 1.0 TUc “limit” serves as a trigger for initiation of a toxicity reduction evaluation (TRE)/ toxicity investigation evaluation (TIE) process. Delete or modify footnote 13 so that it is clear the 1.0 TUc limit shall be enforceable only as a trigger for initiation of accelerated monitoring.	X		The footnote was modified.	Modified footnote
1.0 TUc WLA	10	Camarillo SD and City of Thousand Oaks requested that Section IV.A.1.i.ii be modified appropriately as shown in the attached underline-strikeout version of the Tentative Order.		X	The reference to the WLA was removed, but the standard toxicity language was added.	Inserted standard text
Rounding off	11	The Dischargers pointed out that the loadings should be shown as their actual values: BOD average monthly: 1210 lbs/day; BOD average weekly: 1810 lbs/day; BOD daily maximum: 2720 lbs/day; and TSS average weekly: 2420 lbs/day; TSS daily maximum: 2720 lbs/day.	X		The concentration-based limits had been converted to mass loadings, but the results had been rounded to two significant figures. The values will be rounded to three significant figures as requested.	Revised result to one more significant digit

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WLA as Monthly Ave, not Daily Maximum	12*	The Dischargers pointed out that the daily load allocations in the TMDL are not equal to the maximum concentration limits multiplied by the design flow for the treatment plant and requested the removal of the ammonia mass effluent limit.		X	There was a typo in the TMDL. The mass-based WLA corresponds to the monthly average concentration expressed in lbs/day using the flow in the TMDL staff report, expressed as cubic feet per second, using the appropriate conversion factors instead of a daily maximum. [calculation = (concentration x flow in MGD x conversion factor – 10% margin of safety)]. For Camarillo mass-based Mo Ave = (3.5 mg/L x 8.34 x 10.4 cfs x factor) – 10% MOS) = 176.6 lbs/day) For City of Thousand Oaks mass-based MoAve = 3.1mg/L x 8.34 x 16.7cfs x factor = 251 lbs/day. For Simi Valley mass-based Mo Ave = (2.4 mg/L x 8.34 x 19.3 cfs x factor) – 10% MOS) = 224.7 lbs/day) The mass-based WLA was deleted from the daily maximum column and moved to the Monthly Average column.	Corrected error
Removal of Limits	13*	Camarillo SD requested the removal of the effluent limits for antimony and alpha-Endosulfan from Table 6a. Antimony and alpha-Endosulfan have no reasonable potential, because the effluent data for the time-frame considered were all undetected. Ambient data can trigger RP only if the constituent is also detected in the effluent.		X	The limit for alpha-Endosulfan was removed because there was no reasonable potential and because one of the anti-backsliding exceptions applied. However, the anti-backsliding exception did not apply in the case of Antimony, because the Discharger did not provide data to demonstrate that the effluent was not detected at levels at or below the WQO.	Removed one limit, retained Antimony

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Hardness	14*	Camarillo SD and the City of Thousand Oaks requested that the hardness value was used be stated, in the calculation of the effluent limits for copper and nickel.	X		The Discharger is mistaken. The hardness information was found on page 7 of 8, in the footnote to Table R1 of the fact sheet. However, the hardness information was added to the text of the fact sheet in response to the comment. Additional footnotes will not be added.	Hardness discussion was expanded in Fact Sheet
Compliance schedule Footnote	15	The Dischargers requested that Table 6a Footnote 9 be revised to reflect the ten year compliance schedule in the Metals TMDL.	X		The footnote was revised.	Revised footnote
Operative dates of WLA in Footnotes	16	The Dischargers requested the modification of Table 6a footnotes 9, 10, and 11 and Table 6b footnote 14, to emphasize that final effluent limits that are not yet operative will become operative in accordance with the schedules outlined in the relevant TMDL. Please delete final limits in Table 6a and revise Table 6a Footnotes 9, 10, 11 and 14.		X	The final WLA-based limits cannot be removed, but the footnotes will be modified to more clearly specify when those limits become operative.	Modified footnotes, but kept WLA-based limits
Turbidity	17	The Dischargers believe that the effluent limitations for turbidity imposed at Section IV.A.1.f. are not properly included, and they think that they do not correlate to the water quality objective for turbidity. <i>See</i> Water Code §13263. Alternatively, the effluent limitation for turbidity could be expressed as a monthly average of 2 NTU (not the preferred approach, but acceptable as a compromise).		X	Regional Board staff did not impose the requirement to install filters at the Camarillo WRP. Camarillo SD did so on their own accord. Camarillo SD also submitted an ROWD for permit renewal which included filtration as a treatment unit. What the Regional Board is requiring of the Discharger is that they properly operate and maintain their existing equipment, including but not limited to the filters. Since the filters are relatively new at the plant, the 2 NTU turbidity limit was expressed as a monthly average for this permit cycle.	Modified averaging period

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Turbidity	18	Dischargers believe that there is no evidence in the administrative record to suggest the effluent limitations included in the Tentative Order are necessary to protect the water contact recreation beneficial use. In fact, no water quality objective for turbidity has been adopted by the Regional Board for surface water discharges to protect the water contact recreation beneficial use.		X	The Dischargers have not reviewed all of the information in the administrative record. The turbidity requirements are included in the permit for human health protection. USEPA's 1986 Quality Criteria for Water references a maximum limit of 1 NTU for turbidity, where water enters a distribution system. The USEPA document also discusses the link that exists between health considerations, turbidity, and effective chlorine disinfection. Suspended matter provides areas where micro-organisms do not come in contact with chlorine disinfectant.	None necessary
Turbidity	19	Dischargers believe that the Tentative Order appears to base the effluent limitations solely on the definition of "filtered wastewater" contained in uniform statewide water recycling criteria section of Title 22 of the California Code of Regulations, promulgated by the CDPH and applicable only to reclamation projects (<i>i.e.</i> , the beneficial reuse of recycled water, such as agricultural and landscape irrigation), not to surface water discharges. <i>See</i> 22 Cal. Code Regs. §60301.320(a)(2)(A)-(C); <i>see also</i> Water Code §13521. These criteria have not been adopted as water quality objectives by the		X	The turbidity limit is consistent with other permits written for facilities that have filtration as a treatment process.	None necessary
Typographical error	20	Replace both occurrences of "(g)" to "(h)" in section IV.A.1.f	X		The errors have been corrected.	Corrected error
Toxicity	21	In Section A.1.h.ii, replace the 1.0 TUC WLA with the " 1.0 monthly median trigger."	X		The change has been made, consistent with existing implementation policy for toxicity requirement.	Added standard language

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Toxicity	22	Revise section IV, consistent with implementation policy for toxicity.	X		The change has been made.	Added standard language
Interim Limit operative dates	23	Section IV.A.2.a should reference Table 7 and clearly reflect the period that interim limits will apply.	X		The change has been made.	Added clarifying language
PCB compliance	24*	Camarillo SD requested clarification of the MDLs necessary to determine compliance with the PCBs effluent limit of 0.031 µg/l, because the PCBs have different MDLs.	X		As specified on page 3 of the Calleguas Creek OC Pesticide, PCBs, and Siltation TMDL, the WLA for PCBs “applies to the sum of all congener or isomer or homolog or Aroclor analyses.” Section VII.L., of the Order specifies how compliance with effluent limitations, expressed as the sum of several constituents, will be determined.	None necessary
Receiving Water Temperature	25*	The State Water Resources Control Board has previously stated that receiving water objectives for temperature that key compliance off of “natural temperatures” are inappropriate to apply to ephemeral and/or effluent dominated water bodies, and <u>should be modified to reflect site-specific conditions</u>. <i>See In the Matter of the Review on Own Motion of Waste Discharge Requirements Order No. 5-01-144 for Vacaville’s Easterly Wastewater Treatment Plant</i>, Order WQO 2002-0015 at pages 48-50 and <i>In the Matter of the Review on Own Motion The City of Turlock, Municipal Services Department</i>, Order WQO 2002-0016 at pages 14-15. The Dischargers believe that Conejo Creek has no readily		X	Rather than specify a range of temperatures, Regional Board staff will delete the text that appears in parenthesis, and revise receiving water requirement V.A.1 so that it only includes the actual narrative Basin Plan WQO.	Deleted text

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		identifiable “natural temperature,” and establishing a natural receiving water temperature is problematic for purposes of complying with the receiving water limit in the Tentative Order since there may be “natural” flows only during short periods of the year. The Dischargers recommend that the parenthetical text be modified as follows: (or above 70 81 °F if the ambient receiving water temperature is less than 60 73 °F).				
Acute Toxicity	26*	The Discharger requested that the accelerated toxicity monitoring Section V.A.17.d be modified as follows: “If the upstream acute toxicity of the receiving water is greater than or equal to the downstream acute toxicity...”		X	Standard toxicity permit language will not be modified, until the State Board releases the anticipated Toxicity Policy.	None necessary
Monthly median	27	The Discharger requested that Regional Board staff add the phrase “monthly median” in section VI.C.2.a.,	X		The clarifying language was added.	Added language
Spill Clean-up Contingency Plan	28*	The Dischargers request that Section VI.C.3.b of the permit state that “the Spill Clean-up Contingency Plan (SCP) will be completed as part of the SSMP,” under the State Board’s General Order.		X	As part of the annual report, the Dischargers are required to explain the status of ongoing projects and activities. A section could be added to their regular annual report explaining the status of developing or updating their SCP.	None necessary
PMP	29*	The Dischargers request that they be allowed to update the current PMP to reflect changes resulting from the revised NPDES Order.	X		The Dischargers should keep their PMP up-to-date.	None necessary
Preventative Maintenance Plan	30*	The Dischargers request that Section VI.C.b of the permit state that “the Preventative Maintenance Plan will be completed as part of the SSMP,” under the State Board’s General Order.		X	Regional Board staff explained that the Dischargers were required to report the status of developing or updating their PMP, as part of the annual report.	None necessary
Stormwater Coordinates	31	The City of Thousand Oaks requested that the coordinates for the stormwater discharge (not associated with this order) be referenced using updated coordinates.	X		The updated latitude and longitude coordinated have been referenced.	Updated coordinates.

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ATTACHMENT D						
Page Numbering error	32*	Correct the footer for Attachment D to say “Standard Provisions”.	X		The error was corrected on page D-1.	Corrected error
ATTACHMENT E						
Page Numbering error	33	Correct the footer for Attachment E to Start at page E-1.	X		The error was corrected on page E-1 and subsequent pages.	Corrected error
Watershed Monitoring Plan Requirements	34*	The Dischargers feel that the requirement to develop a watershed monitoring program is unnecessary, because responsible parties (including the CCW POTWs) have developed a watershed monitoring program that has been approved by the Regional Board Executive Officer, designed to determine compliance with the Nutrient, Toxicity, OC Pesticide and PCB, and Metals TMDLs, The Dischargers request that the requirement to develop a watershed monitoring program be removed from the MRP, or that as an alternative, that the TMDL based monitoring program be referenced as an on-going effort.			Regional Board staff modified the language in the MRP to indicate that the Dischargers have been participating in a stakeholder group and will implement their watershed monitoring program.	Acknowledged existing watershed effort, but require implementation
Typographical errors	35	Camarillo SD and the City of Thousand Oaks requested that the units for sulfate and TDS be revised to mg/L; that the sample type for cyanide be specified as “grab”; that footnote 6 be added to Fecal Coliform; and, that CFU units be listed in addition to MPN units for bacteria.	X		The corrections were made to section IV.A.1, Table E-3.	Corrected error
Turbidity threshold	36*	The Dischargers requested that the threshold for turbidity reporting be changed from 0.2 to 5 NTUs.	X		Regional Board staff agree that the threshold for turbidity should be revised for reporting minutes over 5 NTU, in the footnote to Table E-3.	Revised to 5 NTU
Monitoring	37*	The Dischargers request that the frequencies of monitoring be		X	Constituents with an effluent limitation need	None

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Frequency		reduced to semiannually for antimony, cadmium, iron, selenium, aldrin, alpha-BHC, alpha-endosulfan, heptachlor expoide, and CTAS, as these constituents were not detected in final effluent during the current permit cycle.			to be monitored more often than twice a year.	necessary
Sample type	38	Camarillo SD and the City of Thousand Oaks requested the revision of Table E-3 to specify a 24-hour composite sample type for mercury; specify grab for dibromochloromethane and chloroform; and change the sample type for chlorpyrifos and Diazinon to "24-hour composite."	X		The errors have been corrected in Table E-3.	Corrected error
Emerging chemicals	39*	The Dischargers believe that the Regional Board has not set forth the rationale for requiring monitoring of these constituents: "emerging chemicals" (1,4-dioxane, perchlorate, 1,2,3-trichloropropane, and methyl tert-butyl ether), (<i>i.e.</i> , why the Regional Board believes such monitoring is necessary).	X		Language was added to the Fact Sheet to explain why the Regional Board is requiring this monitoring.	Explained reason for monitoring
Endocrine disruptors	40	Footnotes 17 through 19 apply to the required monitoring, with footnotes 18 and 19 stating that the specified endocrine disrupting chemicals and pharmaceuticals must be monitored "only when the analytical methods for these chemicals are applicable and approved by the California Department of Public Health...." The Dischargers understand that at this time, CDPH, among other entities, believes the imposition of individual monitoring requirements for these constituents is not appropriate, as the chemistry and analytical techniques simply do not exist to measure accurately, quantify. The Dischargers request that the monitoring requirement be removed.		X	It is important to know whether or not these constituents are present in the effluent or not, and if so, at what concentrations. However, we are aware of the challenges associated with the currently available test methods. That is why we have modified the monitoring requirement to begin in August 2009, only if there is a USEPA-approved test method available, at that time.	None necessary
Residual chlorine	41*	Camarillo SD would like clarification regarding the requirement to collect additional samples for chlorine residual if either trigger is met.		X	The clarification language is already contained in the MRP. See MRP section IV.A.2, which follows Table E-3.	None necessary
Typo-	42	Camarillo SD and the City of Thousand Oaks requested the	X		The errors have been corrected in section	Corrected

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graphical error		following: that “g”replace “h” and that “six- week period” be replaced by “twelve-week period,” to be consistent with other references to accelerated monitoring in the Order and MRP			V.A.2.d.	errors
Accelerated monitoring	43*	The Dischargers request that the accelerated toxicity monitoring requirement be revised to eliminate the monitoring at the downstream monitoring station, if the acute toxicity at the upstream station is greater than that at the downstream station.		X	Standard toxicity language will not be changed.	None necessary
Clarified ambiguous	44	The Dischargers requested that the word “ambiguity” be replaced with suggested language.	X		The term was clarified, by replacing it with the suggested language in Section V.B.2.b.2.	Added clarifying language
Clarifying source water	45	The Dischargers requested that the language in Section V.B.3 be revised to clarify that the six additional toxicity tests shall be conducted on only the water source (effluent or downstream receiving water) for which the monthly median trigger of 1.0 TUC was exceeded.	X		The clarification was made by adding the suggested language.	Added clarifying language
TIE/TRE	46*	The Dischargers request that Section V.B.3.d be revised to remove the requirement that allows the Executive Officer to determine whether an accelerated test schedule may be terminated or used in performing a TRE/TIE where a TRE/TIE is initiated prior to completion of an accelerated testing schedule.		X	Section V.B.3 contains standard toxicity language that was not changed.	None necessary
Accelerated monitoring	47*	The Dischargers believe that accelerated monitoring at the downstream station should not be required if upstream toxicity is greater than or equal to toxicity at the downstream station.		X	Standard toxicity language will not be changed.	None necessary
Typo-graphical error	48	Camarillo SD and the City of Thousand Oaks requested that in Section V.E.4., the reference to “ Section V.D.” be revised to “Section V.B.3”.	X		The error was corrected.	Corrected error
Typo-	49	Camarillo SD requested that “six” be spelled correctly in section	X		The error was corrected.	Corrected

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graphical error		V.E.6.c.				error
Typo-graphical error	50	Camarillo SD and the City of Thousand Oaks requested that in Section V.E.6.d., the reference to “Section D.3.” be revised to “Section B.3.b”.	X		The error was corrected.	Corrected error
Typo-graphical error	51	Camarillo SD and the City of Thousand Oaks requested that Table E-7a, in Section VIII.A.1, be revised as follows: correct the turbidity units to NTU, correct the spelling of “Kjeldahl”, change the footnote reference in the far right column to “20” for pH and subsequent analytes listed in the table, and revise settleable solids units to mL/L.	X		The errors were corrected.	Corrected error
Algal Biomass Monitoring	52*	The Dischargers request that the monthly sampling of algal biomass, in Section VIII.A.1 and VIII be deleted.		X	The United States Environmental Protection Agency and the State of California recommend algal community analysis as a useful tool to help assess ambient water quality conditions in wadeable streams. Monitoring of the algal community is a good complement to the benthic macroinvertebrate assessments that have been routinely conducted in wadeable streams for the past several years. This type of monitoring is being incorporated into the statewide Perennial Stream Assessment in 2008 conducted by the Surface Water Ambient Monitoring Program (SWAMP). SWAMP has developed a draft SOP for Algae and Physical Habitat Field Data Collection (prepared by the Southern California Coastal Water Research Project). This SOP addresses	Reduced frequency to quarterly

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					how to remove algae from various types of substrates and the sampling methodology to employ to collect a representative sample (multiple transects along a stream reach). A final SOP should be released by the end of June, 2008. Although it is true that the sampling equipment used is not commercially available, the devices are simple to construct from readily available materials. Since most of the sample processing occurs in the field, laboratory processing of the samples for chlorophyll a or biomass analyses should be straightforward. We agree that monthly sampling of benthic algal biomass is unnecessary. The required sampling frequency has been reduced to quarterly.	
Typo-graphical error	53	Camarillo SD requested that Table E-7b, in Section VIII.B.1, be revised as follows: correct the turbidity units to NTU, correct the spelling of "Kjeldahl", change the footnote reference in the far right column to "28" for pH and subsequent analytes listed in the table, and revise settleable solids units to mL/L.	X		The errors were corrected.	Corrected errors
Typo-graphical error	54	Delete requirement X.A.5 from the MRP, because it pertains to permits in which ammonia limits are based on regular Basin Plan water quality objectives, rather than on TMDL WLAs.	X		The requirement was deleted.	Corrected error
MRP Self Monitoring	55*	The Dischargers request that the SMR due date for Monthly reports be revised to "By the 15th day of the <u>third</u> month after		X	Only Dischargers with multiple POTWs are given an extra month for report submittals,	None necessary

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Report (SMR) due date		the month of sampling,” instead of on the <u>second</u> month after sampling.			because they handle more sampling results.	
MDL for Influent	56*	The Dischargers request that requirement X.B.4 only apply to effluent and receiving water samples, and not to influent samples.		X	The Dischargers need to submit MDL information for all parameters analyzed.	None necessary
Attachment F						
Limit Comparison Table	57*	Camarillo SD requests that the Fact Sheet include a comparison of existing limits and proposed limits.		X	Such a limit comparison table is included in the Board’s agenda package. A copy will be provided to the Discharger upon completion.	None necessary
Data Set Range	58	Camarillo SD requests to have the MEC specified for a given data range.	X		The effluent data set used for Tier 1 RP was from January 2007 to December 2007, which represents the latest data since the last plant upgrade. However, the dataset for Tier 2 extended past January 2007, because the receiving water upstream of the plant is independent of the plant upgrade. The fact sheet was revised to include a discussion of the dataset.	The Fact Sheet was updated
Data Range	59	Camarillo SD requests to have the data range specified in the header of Table F-2.	X		The data range was specified.	Included information
Data Range	60	Camarillo SD requests to have the data range specified in the discussion of RP.	X		The data range was specified.	Included information
Fact Sheet Footnote	61	Camarillo SD requests that Footnote 1 be added to table F-5.	X		The footnote was added.	Included Footnote
Monitoring Comparison	62*	Camarillo SD requests that the Camarillo Fact Sheet include a table comparing the frequency of monitoring included in the existing MRP vs. the revised tentative MRP, such as was done		X	Such a comparison is not standard in the fact sheet format, however, the comparison table will be done and attached to the response to	None necessary

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		in the Simi Valley Fact Sheet.			comments.	
Tier 2 RPA	63*	Camarillo SD requested that Table R1 be modified to indicate that there was no RP, under Tier 2 for Antimony and for alpha-endosulfan.		X	Regional Board staff partially disagree. There was no RP for alpha-endosulfan, so that limit will be removed. However, the Discharger did not provide data necessary to remove the Antimony limit.	Deleted alpha-endosulfan
TCDD	64*	Camarillo SD requests that the effluent and ambient data provided in Table R1, for 2,3,7,8-TCDD (Dioxin) be multiplied by 10 ⁶ , with units of pg/L, and to clarify that the data represents Dioxin TEQs.	X		The data will be represented as TCDD equivalents.	Update spreadsheet
Hardness	65*	Camarillo SD requests that the column on Table R1, with the footnote describing the hardness value used, be adjusted, because the hardness value was cut off.	X		The table did not need to be reformatted, because the hardness value was shown on page 7 of 8 of Table R1.	None necessary
Attachment J						
Pretreatment Report Due Date	66	The Dischargers requested that the due date for the Pretreatment Annual Report be changed to April 1.	X		The due date of the report was changed to April 1.	Changed due date
Time Schedule Order						
Chloride Interim Limit	67*	The Dischargers requested that the chloride interim limit in the TSO be changed to match the interim limit contained in the Salts TMDL. For Camarillo that would be from 190 mg/L to 216 mg/L.		X	The TSO is intended to maintain the status quo with respect to the stay on the chloride final effluent limit extended by the State Board. The 190 mg/L interim limit is also consistent with the Chloride Drought Policy which had been in effect prior to the State Board's stay. The TSO is set to dissolve upon	None necessary

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					the effective date of the Salts TMDL, following USEPA's approval of the Salts TMDL.	
TSO typo	68	Camarillo SD requested the removal of the last sentence of footnote 1, to the table on page 5 of the TSO	X		The last sentence has been removed.	Corrected error
TSO progress report frequency	69	Camarillo SD requested that the TSO progress reporting frequency be reduced from monthly to quarterly, because the current TSO requires quarterly progress reports.	X		The reporting frequency has been changed to quarterly.	Modified reporting frequency
Comments Received from Heal the Bay in a Letter dated May 5, 2008						
	70	Although the tentative permits appropriately include the 1.0 TUC limit in the "effluent limitations" tables, the following footnote appears to condition 1.0 TUC as a trigger: "The <i>Calleguas Creek Watershed Toxicity TMDL</i> includes a waste load allocation of 1.0 TUC for toxicity, which is required to be implemented in accordance with USEPA, State Board, and Regional Board resolutions, guidance and policy at the time of permit issuance or renewal. Consistent with the TMDL, this "limit" implementing the WLA shall currently serve as a trigger for initiation of the TRE/TIE process as outlined in USEPA's "Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications Under the National Pollutant Discharge Elimination System Program" (2000) and current NPDES permits held by dischargers to the Calleguas Creek Watershed." Emphasis added. This language is unclear and inappropriate. Although an exceedance of 1 TUC should trigger a TRE/TIE, it is still a limit as outlined the Basin Plan Amendment. In other words, an exceedance of 1 TUC		X	The language in the footnote was taken directly from the Implementation Plan section of the Calleguas Creek Watershed Toxicity TMDL (page 7 of Resolution No. R4-2005-009). Language was added to clarify that the 1.0 TUC was not the typical numeric effluent limitation.	Clarifying language was added

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		should be a violation of the permit.				
	71	Implementation schedules included in TMDL Basin Plan Amendments adopted by the Regional Board require the discharger to complete various actions before the final compliance deadline. Heal the Bay requests that the implementation schedule actions, that have completion dates within the term of the permits, be included in the permit requirements, as these are vital components of the adopted TMDLs.	X		A new Attachment K has been created to include the applicable tasks from the various TMDLs, for the Calleguas Creek Watershed POTWs, which are scheduled to take place within the term of these permits.	Created new Attachment K
Comments Received from the California Department of Public Health in a Letter dated May 5, 2008						
Mailing address	72	The California Department of Public Health (CDPH) requested that copies of permits in the Ventura County area be sent to their Santa Barbara District Office.	X		Future permits will be sent to the Santa Barbara Office.	Note change of address
Pharmaceuticals and Endocrine Disrupting Chemicals	73	CDPH does not anticipate establishing approved analytical methods for pharmaceuticals and endocrine disrupting chemicals, including those listed in the draft permit, in the foreseeable future. Permitting agencies have called CDPH's local district offices asking for advice on how to monitor for the chemicals listed in their permit, but CDPH has not been able to assist those agencies since CDPH has not approved any methods.	X		Previously the tentative permits required monitoring using a CDPH method. However, the footnotes in the Monitoring and Reporting Programs of the tentative permits have been revised to require monitoring only if there is a USEPA-approved test method available for these constituents.	Replaced CDPH method with USEPA-approved method
Comments Received from Teresa Jordan Regarding the Simi Valley Tentative, in a Letter dated May 5, 2008						
Stormwater related comments	74	Ms. Teresa Jordan May 5, 2008, comment letter provided detailed comments on the Ventura Countywide Stormwater Quality Management Program and other Ventura County MS4		X	Thank you for submitting comments on the tentative WDRs and NPDES permit for Simi Valley Water Quality Control Plant.	Comments will be forwarded

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		permit issues.			However, your comments regarding City of Simi Valley's stormwater management program and related issues are not germane to the Regional Board's consideration of this tentative NPDES permit for the Simi Valley WQCP. Your stormwater-related comments will be forwarded to our Stormwater Section for their review.	
New Comments Received on May 16, 2008, from Camarillo Sanitary District, the City of Thousand Oaks, and the City of Simi Valley Regarding the Tentative Dated May 6, 2008 (Comments with an “ * ” are re-iterations of previously-submitted comments from Camarillo Sanitary District, the City of Thousand Oaks, and the City of Simi Valley.) Regional Board staff's response remains unchanged, unless otherwise noted.						
Copper WER		Camarillo SD & City of Thousand Oaks request that the formula be adjusted by replacing the WER value of 1.0 with a value of 3.69.		X	The 3.69 WER was adopted by the Regional Board in Resolution No. 2006-022, but it applied to the Lower Calleguas Creek – Reach 2 (downstream/south of Potrero Road to the lagoon). Neither the Camarillo WRP nor the Hill Canyon WWTP discharge to that reach of Calleguas Creek Watershed. Both POTWs discharge upstream of that reach.	None necessary
Algal Biomass units		The Dischargers appreciated that the frequency of monitoring was reduced to quarterly from monthly, but they requested that the units be modified.	X		The units were changed to mg/cm ² .	Modified units to mg/cm ²
TSD RPA reference		The Dischargers request that language be removed from the Fact Sheet referencing USEPA's Technical Support Document (TSD) methodology for RPA, because they believe that the TSD		X	The TSD RPA methodology has been and will be applied to non-CTR water quality objectives (WQOs), such as Basin Plan	None necessary

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		is only for non-priority pollutants.			WQOs.	
Typographic error		Camarillo SD requests that arsenic be replaced by antimony, in the Fact Sheet section IV.C.3, page F-29.	X		The error was corrected.	The error was corrected
Antimony Limit		Camarillo SD requests that the limit for Antimony be deleted from Tables F-5 and F-6, because they do believe it shows reasonable potential.		X	Regional Board staff could not conclude that there was no reasonable potential, because the data submitted had a reporting level much higher than the applicable water quality objective. In addition, the current order contains an effluent limitation for antimony. The anti-backsliding exception did not apply.	
Attachment K		The Discharger requested that Task 15b be removed from Attachment K, because POTWs are not listed as responsible parties.		X	The Dischargers only need to complete tasks applicable to them, as specified in the TMDL.	None necessary
Attachment K		The Discharger requested that language be added to clarify that "The annual report shall include a statement verifying that the TMDL tasks, included in Attachment K, have been completed."	X		The following language was added: The annual report shall include a statement verifying which of the applicable TMDL tasks, included in Attachment K, have been completed.	Language was added
Comments Received from Mrs. Teresa Jordan in a Letter dated May 16, 2008						
	1	Mrs. Teresa Jordan asked the Regional Water Board to make the retention period for <u>all</u> records consistent with the 5 years and Part 503 provision since it is also stated in the same paragraph "This period may be extended by request of the Regional Water Board Executive Officer at any time.		X	Thank you for submitting comments on the revised tentative WDRs and NPDES permit for Simi Valley Water Quality Control Plant. However, we are only accepting comments on strikeout/underline changes that were made to the revised tentative NPDES Order.	None necessary
	2	Page D-9, under Section G. Anticipated Noncompliance, there is no provision for the Discharger to give advance notice to the		X		None necessary

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		public "of any planned changes in the permitted facility or activity that may result in noncompliance with General Order requirements."			Please see Response to Comment No. 1.	
	3	Page E-14, under Section B.2.b.i. Screening and Monitoring, a specific time period is not given for the Discharger to "conduct the first chronic toxicity test screening for three consecutive months in 2008". Half the year is almost over.		X	Please see Response to Comment No. 1.	None necessary
	4	Page E-15, under Section 2. Re-screening, it is stated. "If the first suite of re-screening tests demonstrate that the same species is the most sensitive then the screening does not need to include more than one suite of tests."		X	Please see Response to Comment No. 1.	None necessary
	5	Page F-4, under Section II.A. Description of Wastewater and Biosolids Treatment or Controls, it is stated "Treated wastewater discharged to Arroyo Simi is dechlorinated but the effluent delivered for reuse is not dechlorinated."		X	Please see Response to Comment No. 1.	None necessary
	6	Page F-34, under Section xvii. Radioactivity, second sentence, it is stated "Mining or industrial activities increase the amount of radioactive substances in waters to levels that are harmful to aquatic life, wildlife, or humans. Section 301 (f) of the CWA..." and "Chapter 5.5 of the California Water Code" "section 13375" contain radioactivity discharges prohibitions to federal navigable waters, and State of California waters. Yet, it is also stated that "However, rather than give a hard and fast absolute prohibition on radioactive substances, Regional Water Board staff have set the following effluent limit for radioactivity: 'Radioactivity of wastes discharged shall not exceed the limits		X	Please see Response to Comment No. 1.	None necessary

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		specified in Title 22, Chapter 15, Article 5, section 64443, of the California Code of Regulations, or subsequent revisions.' The limit is based on the Basin Plan incorporation of Title 22, Drinking Water Standards, by reference, to protect beneficial uses. Therefore, the accompanying Order will retain the limit for radioactivity." No wonder the Rockwell/Boeing Rocketdyne Santa Susana Field Laboratory (SSFL) has been allowed to slip through the cracks with regard to its own NPDES related Permit, the City of Simi Valley's Municipal related NPDES Permit, and the Ventura Countywide MS4 related NPDES Permit.				
	7	Page F-59, under Section B. Groundwater, fourth sentence, it is stated "Surface water from the Arroyo Simi percolates into the Simi Valley and Ventura Central Groundwater Basins with MUN beneficial use specified in the Basin Plan. Since groundwater from the Basins is used to provide drinking water to the community, the groundwater aquifers should be protected. However, this Order and Monitoring and Reporting Program does not include requirement for groundwater monitoring because none of the limitations are based upon the protection of MUN use of underlying groundwater." Yet, on Page F-62 it is stated under Section D.2. Groundwater "Groundwater monitoring is required to determine compliance with groundwater limitations and to track impacts to the groundwater basin."		X	Please see Response to Comment No. 1.	None necessary
	8	Pages F-60 and F-61, Table 9. Effluent Monitoring Program Comparison Table changes: Algal biomass (Chlorophyll a) is being deleted, Flouride is		X	Please see Response to Comment No. 1.	None

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		semiannually instead of monthly, Gamma-BHC(Lindane) is semiannually instead of monthly, Iron: 2,3,7,8-TCDD(Dioxin); Tetrachloroethylene, Endrin, Methoxychlor, Barium, 2,4-D, and 2,4,S-TP(Silvex) are semiannually instead of quarterly.			However, changes (reductions) to this monitoring frequency are due to the fact that these constituents did not show reasonable potential to exceed the criteria.	necessary
	9	Page F-61, Table 9. Effluent Monitoring Program Comparison Table, Ammonium perchlorate has no change. It should be done quarterly.		X	This is the standard monitoring frequency given to major POTWs.	None necessary
	10	Page F-61, Table 9. Effluent Monitoring Program Comparison Table, Methyl-tert-butyl-ether (MTBE) has semiannually. It should be done quarterly.		X	This is the standard monitoring frequency given to major POTWs.	None necessary
	11	Page F-61, Table 9. Effluent Monitoring Program Comparison Table, 1,2,3-Trichloropropane's is the same--semiannually. Should be quarterly.		X	This is the standard monitoring frequency given to major POTWs.	None necessary
	12	Fecal Coliform (monthly), E. Coli (monthly) , and Radioactivity(monthly) have been excluded from Table 9. Effluent Monitoring Program Comparison Table (Pages F-60 and F-61).		X	Table 9 is the Effluent Monitoring Comparison. The comment is related to the Receiving Water Monitoring.	None necessary
	13	Pages F-66, under Section VIII. Public Participation B. Written Comments, it is stated "Interested persons are invited to submit written comments concerning these tentative WDRs. Comments must be submitted either in person or by mail to the Executive Officer at the Regional Water Board at the address above on the cover page of this Order." This does not comply with Governor Schwarzenegger's open government policy.		X	Pursuant to the Open Meeting Act, any person can address the Board in person about this permit.	None necessary
	14	Page 45, under Section 7. Compliance Schedules, it is stated "The stakeholders in the Calleguas Creek Watershed are		X	At this time, the watershed-wide Calleguas Creek monitoring coalition does not include	None necessary

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		embarking on a watershed-wide solution to salt management... the dischargers need time to complete the capital improvement projects." They also need time to get to County voters the matter of property-related fees to cover NPDES Permit projects. The Amendment to the 1992 Countywide NPDES Permit Implementation Agreement does not have all t's crossed, and it's dotted. Also, the Amendment to the 1992 IA mentions under the Recitals that there are 4 separate 1992 Implementation Agreements --"divided by watershed zone and approved by the CITIES, the COUNTY and the DISTRICT" (Whereas.)--yet I have counted only 3.			non-point, stormwater dischargers. Therefore, the comment relating to Amendment to the 1992 Countywide NPDES Permit Implementation Agreement is not germane to the regional Board's consideration of this NPDES permit.	
	15	Page D-6, under Section V. STANDARD PROVISIONS - REPORTING B. Signatory and Certification Requirements. Same comments as #14.		X	Please see Response to comment No. 14.	None necessary
	16	Page 1,-5, under Section N, it is stated "A watershed-wide Monitoring Program will be developed within two years from the effective date of this Order and permit for the Calleguas Creek Watershed... Changes to the compliance monitoring program may be required to fulfill the goals of the watershed-wide monitoring program... Revisions to the Discharger's program will be made under the direction of the Regional Water Board, as necessary, to accomplish the goal, and may include a reduction or increase in the number of parameters to be monitored, the frequency of monitoring, and/or the number of samples collected." Same comments as #14.		X	Please see Response to comment No. 14.	None necessary
	17	Page E-23, under VIII. OTHER MONITORING REQUIREMENT A. Watershed Monitoring 1., it is stated "To achieve the goals of the Watershed-wide Monitoring Program,		X		

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		revisions to the Receiving Water Monitoring Requirements will be made under the direction of USEPA and the Regional Board. The City has participated with stakeholders in the Calleguas Creek Watershed, to develop the watershed-wide monitoring program. The Discharger shall implement the watershed-wide monitoring program and shall submit quarterly reports detailing ongoing efforts toward the implementation of the Watershed-wide Monitoring Program." Same comments as #14. I concur with the last sentence that states "The first report should be received in the Regional Board office by October 15, 2008."			Please see Response to comment No. 14.	None necessary
		QUESTIONS: (BY MRS. TERESA JORDAN)				
	1	Does the May 6, 2008 letter from Blythe Ponak-Bacharowski, Chief Municipal Permitting Unit (NPDES), to Mr. James Langley, City of Simi Valley Deputy Director/Sanitation Services, MAILING LIST entity the "Ventura County Department of Public Works, Flood Control and Drainage" refer to the Ventura County Flood Control District? If so, the name is incorrect since this entity is now named the Ventura County Watershed Protection District, and impacts the Amendment to the 1992 Ventura Countywide NPDES Permit Implementation Agreement.	X		Correction will be made to the final Agenda package to reflect change in the District's name.	Change will be made.
	2	What is the date (month, day and year) of the City of Simi Valley Water Quality Control Plant (WQCP) topographical map on Page B-1?		X	The topographic map provided in the revised tentative permit is taken from a website: www.topozone.com , which no longer provides free access. Therefore we do not	None necessary

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					have the information available on the date the map was generated. However, the map depicts the location of the Simi Drive-In Theater, so the map predates early 2001, when the Drive-in was demolished.	
	3	On Page F-14, Table 3b. Basin Plan Beneficial Uses - Ground Waters, for the Simi Valley Basin DWR Basin No. 4-9 <u>Confined Aquifers</u> , it is stated "Municipal and domestic water supply (MUN), industrial service supply (IND), industrial process supply (PROC), and agricultural supply (AGR)". What entities benefit from this agricultural supply? Give name of entities, addresses, and locations (within, or outside of the City of Simi Valley).		X	Regional Board staff preparing the tentative Order does not have that information available. However, the beneficial uses listed in the Regional Board's Basin Plan must be protected regardless if there are users of those beneficial uses.	None necessary
	4	On page F-15, Table 3b. Basin Plan Beneficial Uses - Ground Waters, of the Simi Valley Basin DWR Basin No. 4-9 <u>Unconfined Aquifers</u> , it is stated "Municipal and domestic water supply(MUN), industrial service supply (IND) , industrial process supply(PROC), and agricultural supply (AGR)". What entities benefit from this agricultural supply? Give name of entities, addresses, and locations (within, or outside of the City of Simi Valley).		X	See Response to Question No. 3.	None necessary
	5	Is the P.W. Gillibrand Company facility the only mining entity within, or adjacent to, the City of Simi Valley? Does the Company still mine Titanium? Is it still exported by boat out of the port in the County of Ventura?		X	Regional Board staff preparing the tentative order does not have any information on this facility, nor are the operations at the facility germane to this NPDES permit.	None necessary
	6	What were the changes to the Effluent Limitations for Cyanide's		X	The average monthly of 3.9 µg/L and	None

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		Average Monthly and Maximum Daily due to (Table 6, Page F-45)?			maximum daily limit of 9.4 µg/L for cyanide was changed to 4.3 µg/L and 8.5 µg/L, respectively, due to a statistical change related to the coefficient of variation (CV) and detection levels.	necessary
	7	Where is the “Ventura Central Groundwater” Basin located Page F-59)? Is this the Las Posas Basin?		X	Ventura Central Groundwater Basin is the main groundwater basin that includes the sub-basins of Las Posas, Pleasant Valley, Oxnard Plain, Santa Clara-Santa Paula, Santa Clara-Sespe, and Santa Clara-Piru.	None necessary
	8	Does this Order cover the future City of Simi Valley/P.W. Gillibrand Company Tapo Canyon/ Gillibrand Canyon Water Treatment Plant? If not, why not? Will a separate Municipal NPDES Permit be required or the Tapo Canyon/Gillibrand Canyon Water Treatment Plant?		X	No. This tentative permit will not cover future P. W. Gillibrand Canyon Water Treatment Plant. Gillibrand needs to apply for a Report of Waste Discharge to be covered under its own NPDES permit or general permit, should it be discharging wastewater to surface waters.	None necessary
	9	Why was the information on the May 16, 2008 extended period noted on Page F-66?	X		The relevant comment period deadline and location in the Fact Sheet will be modified in the final Board agenda package.	Change will be made.
	10	Why was the information on the Board's meeting location change not noted on Page F-66?	X		Please see answer to Question No. 9.	Change will be made.
		ERRORS				
	1	Page F-5, under Section B. Discharge Points and Receiving Waters, middle paragraph, second sentence, it is stated “Storm water and dry weather urban runoff from MS4 are regulated	X			

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		under an NPDES permit, Waste Discharge Requirements for Municipal Storm Water and Urban Runoff Discharges within the Ventura County Flood Control District, County of Ventura, and the Cities of Ventura County (Ventura Municipal Permit), NPDES Permit No. CAS004002)." The sentence must read "Ventura County Watershed Protection District (formerly Ventura County Flood Control District)" to coincide with the Amended 1992 Countywide NPDES Permit Implementation Agreement.			Correction will be made to the Board's Agenda package submittal to reflect such change.	Change will be made
	2	Page F-5, under Section B. Discharge Points and Receiving Waters, second to last paragraph, first sentence, it is stated "The Ventura County Flood Control District channelized portions of Calleguas Creek to convey and control floodwater, to prevent damage to homes located adjacent to the Creek." The sentence must read "Ventura County Watershed Protection District (formerly Ventura County Flood Control District)" to coincide with the Amended 1992 Countywide NPDES Permit Implementation Agreement.	X		Correction will be made to the Board's Agenda package submittal to reflect such change.	Change will be made.
	3	Page F-61, Table 9. Effluent Monitoring Program Comparison Table, information for 1,2,3-Trichloropropane has semiannually instead of "no change".	X		Correction will be made to the Board's Agenda package submittal to reflect such change.	Change will be made.
		SUGGESTIONS				
	1	Pages F-1 and F-2, ATTACHMENT F - FACT SHEET Table of Contents, Capitalize the titles of the Roman numerals' sections to coincide with the text.		X	This revised tentative permit is drafted using a Statewide NPDES permit template which is being used by all Regional Water Boards to	None necessary

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					facilitate electronic reporting of data.	
	2	Pages F-60 and F-61, Table 9. Effluent Monitoring Program Comparison Table, to the Monitoring Frequency (2003 Permit) and (2008 Permit) columns' titles add the word "Sampling" between Monitoring and Frequency.		X	The comment is non-substantive and does not require any changes.	None necessary
	3	Page F-61, Table 9. Effluent Monitoring Program Comparison Table, change the order of 4,4'-DDT and 4,4'-DDD to coincide with Page E-22.		X	The comment is non-substantive and does not require any changes.	None necessary