

PUBLIC WORKS ADMINISTRATION
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April 1, 2008

Ms. Tracy Egoscue, Executive Officer
Regional Water Quality Control Board – Los Angeles
320 West 4th Street, Suite 200
Los Angeles, CA 90013

**TENTATIVE WASTE DISCHARGE REQUIREMENTS AND NATIONAL
POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT –
CITY OF OXNARD WASTEWATER TREATMENT PLANT (NPDES PERMIT
No. CA0054097, CI NO. 2022)**

Dear Ms. Egoscue:

Thank you for the opportunity to comment on the tentative National Pollutant Discharge Elimination System Municipal Separate Storm Sewer System permit for the City of Oxnard Wastewater Treatment Plant (WWTP). The tentative permit departs from the normal style of NPDES permit for the WWTP, and we have commented on the format in addition to the following technical comments on the tentative permit:

FORMAT

It is unclear why the format of the permit has changed. The tentative permit is structured as one order with the following attachments:

- A. Definitions
- B. Map
- C. Flow Diagram
- D. Standard Provisions
- E. Monitoring and Reporting Program
- F. Fact Sheet

- G. Generic TRE Workplan Requirements
- H. Stormwater Pollution Prevention Plan Requirements
- I. Biosolids and Sludge Management
- J. Pretreatment Program Requirements
- K. Reasonable Potential Analyses

FACT SHEET

LEGEND

	DESIGN TO 1ST CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 1ST		ENTRANCE
	DESIGN TO 2ND CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 2ND		SECURITY PERIMETER
	DESIGN TO 3RD CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 3RD		
	DESIGN TO 4TH CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 4TH		
	DESIGN TO 5TH CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 5TH		
	DESIGN TO 6TH CHANNEL		DESIGN TO REMOVAL RD		DESIGN TO 6TH		

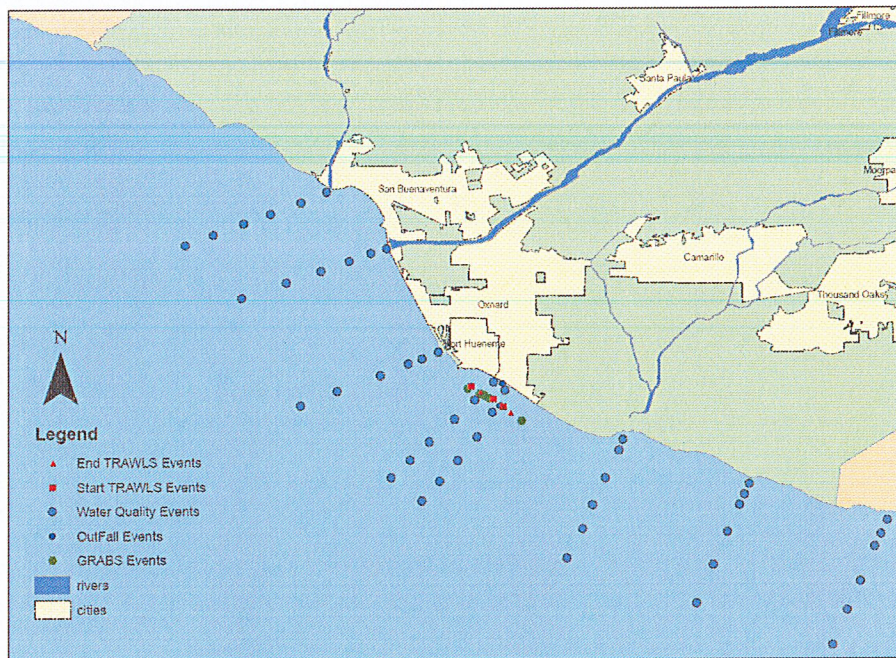
OXNARD WASTEWATER TREATMENT PLANT

The treatment plant stormwater program is now implemented under the Municipal Stormwater Permit for Ventura County. The inclusion of stormwater requirements in the tentative NPDES permit for the WWTP is now duplicative, and we request that these requirements be eliminated from the draft. These requirements are covered under item e. *Activities Coordination*, on page 37 of the Order.

Page F-8, item E. *Planned Changes*, states that “The Discharger is constructing the site and installing the devices at this site to deliver 6.25 MGD of high quality recycled water to users for the Groundwater Recovery Enhancement and Treatment (GREAT) Program. This recycled water is product of secondary-treated wastewater further processed through microfiltration, ultrafiltration, reverse osmosis, ultraviolet-light-based advanced oxidation. These new facilities won’t affect the quality of the secondary-treated wastewater being discharged into the Pacific Ocean.” The project, as proposed, is scheduled for completion in 2011. Since there will be a reduction in the volume of wastewater discharged to Outfall 001, and a return of reverse osmosis reject water to the outfall, the expected concentration of constituents in the final effluent is expected to rise. We suggest changing the final sentence to read “These new facilities will have a marginal impact on the quality of the wastewater being discharged into the Pacific Ocean”.

Page F-10, Table 4 *Basin Plan Beneficial Uses*, lists the receiving water bodies, and their beneficial uses, that are in the area of the City of Oxnard outfall. The table incorrectly identifies our outfall, Discharge Point 001, as going to Ormond Beach. We suggest deleting the column “Discharge Point” from Table 4, and rely on Table 5 on Page F-11 (California Ocean Plan) to identify beneficial uses of the receiving water at Discharge Point 001. A similar change should be made to the Findings section of the Order.

Page F-34, *Receiving Water Monitoring*, starts the discussion of surface water monitoring, including core monitoring (local), regional monitoring (participation in Southern California Coastal Water Research Project (SCCWRP) bight-wide monitoring), and special studies. Historically, our core monitoring (i.e., quarterly ocean monitoring) has consisted of the following stations:



As this monitoring is regional in nature, and measures the impacts to ocean water quality from a variety of diverse sources, we request that the core monitoring program be limited to identifying the impacts from the discharge on ocean water quality in the vicinity of the discharge. This will become increasingly important if other ocean outfalls are approved in proximity to the existing City of Oxnard Discharge Point 001. The scale of monitoring could then be expanded again under Bight '08 and future Bight efforts under SCCWRP.

Additionally, City of Oxnard staff have met with Regional Board staff regarding our preferences for special studies under the permit. We prefer to curtail our participation in the Central Region Kelp Survey Consortium and the monitoring of discharge from the Ventura and Santa Clara rivers during storm events in favor of wetlands monitoring at Ormond Beach.

ORDER

II. FINDINGS

Page 10, R. *Performance Goals*, states, in part, that the performance goal approach “is consistent with the antidegradation policy in that it requires the Discharger to maintain its treatment level and effluent quality, recognizing normal variations in treatment efficiency and sampling and analytical techniques. However, this approach does not address substantial changes in treatment plant operations that could significantly affect the quality of the treated effluent.” Our 2002 permit included performance goals for the first time and, following the above logic, should be revisited when substantial changes to the treatment operations are made. These changes are anticipated in our proposal for advanced treatment and reuse described in our Groundwater Recovery Enhancement and

Treatment (GREAT) Program (see Fact Sheet discussion above). We would prefer that the reasonable potential analysis and changes to performance goals be made with these changes to the treatment processes.

Page 29, 2. *Special Studies*, Technical Reports and Additional Monitoring Requirements, includes the development and implementation of plans that are required under other programs and permits. These include:

B(3)a. Storm Water Pollution Prevention Plan (SWPPP) – covered under NPDES Permit No. CAS004002, the Municipal Stormwater Permit for Ventura County

C(6) Spill Reporting Requirements - covered under SWRCB Order No. 2006-0003 Statewide General Waste Discharge Requirements for Sewage Collection System Agencies

These requirements are adequately covered under item e. *Activities Coordination*, on page 37 of the Order, and we recommend deletion of these requirements.

MONITORING AND REPORTING PROGRAM

Page E-19, 2., defines the 18 stations for bacteria and ammonia monitoring. Currently, we are performing these analyses at Stations 4401 to 4406, 4391 to 4396, and 4301 to 4306. We prefer to continue monitoring the historical stations.

Page E-21, Footnote 19, requires that, among other parameters for benthic infauna measurement, weight of each taxonomic group be made. Biomass for infauna was dropped in the SCCWRP Model Monitoring Program (MMP) and is not measured for the Bight regional monitoring program. As this metric provides no useful information regarding the potential impacts of the City's outfall, we prefer that this requirement of the footnote be deleted.

Page E-22, c., *Sediment Toxicity Monitoring Program*, requires the use of the amphipod *Rhepoxynius abronius* survival end point and the polychaete *Neanthes arenaceodentata* growth and survival end points as an indicator of sediment toxicity. *Eohaustorius* is now being used for the Bight studies in place of *Rhepoxynius*, and we prefer to continue consistency with the Bight monitoring in our local studies. Further, *Neanthes* has become increasingly difficult to procure locally, and we prefer that this species be dropped from the requirement.

Page E-22, C., *Monitoring for Fish and Macroinvertebrate*, includes a requirement that "Data will also be collected on trash and debris to contribute to the SMBRP's Sources and Loadings program." This appears to be a carry-over from another permit, and we recommend deletion of the requirement.

Page E-23, b., *Fish and Invertebrate Tissue Monitoring Program*, lays out the requirements for analyses for bioaccumulation of pollutants in organism tissue. In our experience, the sampling for these organisms is often difficult or impossible, due to the low numbers of organisms or small organism size. We recommend that this protocol be replaced by the deployment of mussel arrays in the vicinity of the outfall for a period of three months each year, similar to the State Mussel Watch Program. These arrays could be positioned to directly address the question of outfall related affects on invertebrate tissue burdens in the survey area and eliminate the harvesting stress on indigenous populations

Thank you again for the opportunity to comment on the draft permit for our WWTP. We look forward to our continued role as the stewards of ocean water quality in Ventura County. If you have any questions regarding our comments on the draft permit, please feel free to call me at (805) 271-2205, or contact Mark Pumford, Technical Services Manager, at (805) 271-2220.

Sincerely,



Mark S. Norris
Assistant Public Works Director