Items 16
Response to Comments
for
Tentative Order Dated February 28, 2008

City of Oxnard
Oxnard Wastewater Treatment Plant
Tentative NPDES Permit

(This Table summarizes the comments received from interested parties with regard to the above-mentioned facility's Tentative Permits. Each comment presented has a corresponding Regional Board's response and/or corresponding action taken.)

No.	Comment	Agree	Disagree	Response to Comment	Action Taken
Letter from City of Oxnard Dated on April 1, 2008					
FORMAT					
1.	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 Separate attachments are made for: G. Generic TRE Workplan Requirements H. Stormwater Pollution Prevention Plan Requirements I. Biosolids and Sludge Management J. Pretreatment Program Requirements K. Reasonable Potential Analyses The City's preference is for Fact Sheet, Order (with attachments A, B, C, D, G, H, I and J), and Monitoring and Reporting Program. This would separate the rationale for requirements from the requirements of the Order, and also		X	Regional Board staff disagree. The format of the tentative Order dated February 28, 2008 was based upon the statewide standardized format used currently by all Regional Boards in order to facilitate the California Integrated Water Quality System (CIWQS) data entry.	None necessary

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	allow flexibility in implementing an adaptive management approach to monitoring, subject to Executive Officer approval.				
FACT SHEET					
2.	Page F-5, item 2.A.2, *Description of Wastewater and Biosolids Treatment or Control*, states that "All of the storm water runoff traversing the treatment areas of the Facility premises is captured and treated in the plant." With the construction of our new Headworks facility this year north of the main treatment area, this statement is no longer valid, and we are currently developing a stormwater plan for the entire treatment plant.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.	X		Regional Board staff agree. The statement of "All of the storm water runoff traversing the treatment areas of the Facility premises is captured and treated in the plant." has been replaced with the following: "Under previous permits, all of the storm water runoff traversing the treatment areas of the Facility premises was captured and treated in the plant. With the 2008 expansion of the treatment plant, including the new headworks facility, this is no longer the case. Runoff from the facility is now regulated under the Municipal Stormwater Permit for Ventura County as a public agency activity subject to development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). Future expansions (see GREAT Program discussion under E. Planned Changes) will be added to the SWPPP as appropriate."	Change has been made
3.	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."	X		Regional Board staff agree to modify the last sentence of Item E on Page F-8 as "These new facilities may have a marginal impact on the quality of the wastewater being discharged into the Pacific Ocean."	Change has been made.
4.	Page F-10, Table 4 *Basin Plan Beneficial Uses*, lists the receiving water bodies, and their beneficial uses, that are in the		X	Regional Board staff disagree. Table 4 and Table 5 are based upon the Basin Plan Beneficial Uses and the 2005 Ocean Plan	None necessary

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	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.			Beneficial Uses, respectively. Table 4 specifies three receiving waters, which are Ormond Beach, nearshore Pacific Ocean, and offshore Pacific Ocean. However, Table 5 only specifies one receiving water, which is Pacific Ocean, not Ormond Beach.	
5.	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 (Map is available on Page 4 of the City's comment letter):				
	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.	X		Regional Board staff understand the City of Oxnard's concerns. The proposed core monitoring program on ocean water quality is identical with the current monitoring program specified in Order No. R4-2002-0129. The City of Oxnard must continue to conduct this program. However, when other ocean outfalls such as the Calleguas Municipal Water District Regional Salinity Management Pipeline Project are operating, in approximately two years, the City of Oxnard and the Calleguas Municipal Water District will have a new coordinated receiving water monitoring program. Therefore, the existing scale of receiving water monitoring program for the City of Oxnard may be reduced in order to coordinate with other monitoring efforts conducted by the Calleguas Municipal Water District. A reopener has been added as "This Order may be reopened and modified to revise the receiving water monitoring program as a result of future other ocean outfalls being constructed in proximity to the existing City of Oxnard Discharge Point 001."	Reopener has been added.
	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		X	Regional Board staff disagree. The Central Region Kelp Survey is an integral part of our regional monitoring efforts. It provides very useful information at a reasonable cost, so we will require the City of Oxnard to continue as a member of the consortium. Monitoring	None necessary

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	discharge from the Ventura and Santa Clara rivers during storm events in favor of wetlands monitoring at Ormond Beach.			of the Ventura and Santa Clara River discharges during storm event was an important component of Bight '03, but is not being conducted during Bight '08. If the City of Oxnard would like to propose wetlands monitoring at Ormond Beach as a special study, we would not object.	
ORDER					
6.	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.	X		Reopener language of recalculating reasonable potential analysis and performance goals has been added, when the GREAT program is on line. This reopener is as below: "This Order may be reopened and modified, to revise effluent limitations and performance goals as a result of the GREAT program."	Change has been made.
7.	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	X		Regional Board staff agree.	Change has been made.
	C(6) Spill Reporting Requirements - covered under SWRCB Order No. 2006-0003 Statewide General Waste Discharge Requirements for Sewage Collection System Agencies		X	The requirements can not be removed since they are requirements mandated by the Federal Clean Water Act (see Fact Sheet for State Water Resources Control Board Order No. 2006-0003). Other NPDES permits issued by the Regional Board contain similar requirements. All NPDES permits for POTWs currently include federally required standard conditions, three of	None necessary
	These requirements are adequately covered under item e.				

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	Activities Coordination, on page 37 of the Order, and we recommend deletion of these requirements.			which apply to collection systems. NPDES permits must clarify that the following three conditions apply to that part of the collection system that is owned or operated by the POTW owner or operator. These conditions are: • Duty to mitigate discharges (40 CFR 122.41(d)) • Requirement to properly operate and maintain facilities (40 CFR 122.41(e)) • Requirement to report non-compliance (40 CFR 122.41(l)(6) and (7)) In general, the Clean Water Act prohibits the discharge of pollutants from point sources to surface waters of the United States unless authorized under an NPDES permit. (33 U.S.C. §§1311, 1342). This obligation is separate and distinct than the requirements contained in California Water Code (CWC) section 13263. Therefore, sanitary sewer spills are prohibited and cannot be permitted by either the CWA or the CWC. The NPDES permit requirements contained in this Order provide only the necessary timeliness lacking in the statewide SSO WDR, they do not require additional information or more detail for the reporting requirements, in case a spill does happen, beyond the information specified in sections A.9., A.11. and B.6 of the Monitoring and Reporting Program No. 2006-0003 of the SSO WDR. It provides for prompt response and adequate characterization of the spill in case water quality and public health is or may be affected by the sewage spill. The Regional Board is a next to first responder and it is mandated to assist the public health agencies in protecting the public's health in addition to protecting water quality and the environment. Therefore, the permit does not require any different information or redundant than the one specified in the SSO WDR. The permit makes it clear in Section IV.J. that when the documentation for the prevention measures will be available in compliance to the SSO WDR, it will be accepted as satisfying the requirements of certain sections of the permit, so the discharger	

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				will not be subject to duplicative conditions at that time.	
MONITORING AND REPORTING PROGRAM					
8.	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.	X		Regional Board staff agree.	Changes have been made.
9.	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.	X		Regional Board staff agree. Biomass for infauna has been deleted.	Changes have been made.
10.	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 Rhepoxinius, and we prefer to continue consistency with the Bight monitoring in our local studies. Further, Neaanthes has become increasingly difficult to procure locally, and we prefer that this species be dropped from the requirement.	X		Regional Board staff agree. Rhepoxynius abronius has been replaced with Eohaustorius. Polychaete Neanthes arenaceodentata has been deleted.	Changes have been made.
11.	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.		X	Regional Board staff disagree. During the bight-wide regional monitoring studies, SCCWRP has documented the presence of large amounts of anthropogenic debris in trawl samples. This is a concern and we would like the City of Oxnard to continue to collect this information during routine trawling operations.	None necessary
12.	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		X	Regional Board staff disagree. We understand that it can be difficult to collect fish and macroinvertebrates. However, these organisms serve better to assess human health risk and/or ecological risk than deployed mussels. At the present time, SCCWRP is designing a program to expand "Mussel Watch" type of monitoring throughout the Southern California Bight, so in the future we may shift monitoring or add new monitoring requirements to accommodate mussel monitoring.	None necessary

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	invertebrate tissue burdens in the survey area and eliminate the harvesting stress on indigenous populations.				

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Letter from Heal the Bay Dated on March 28, 2008					
1.	**Performance Goals and Limits** Performance goals are extremely poor regulatory mechanisms, and thus, should be replaced with enforceable effluent limitations. Performance goals "are not considered as enforceable limitations or standards" (Tentative Permit at F-29), and an investigation of toxicity must be initiated only when an exceedance persists in "three successive monitoring periods" (Tentative Permit at F-31). What happens in the event that the Permittee exceeds a performance goal every other monitoring period? This appears to be a "loophole" that is not covered by the tentative permit. Under the Tentative Permit, the discharger may be exceeding Ocean Plan water quality objectives without being held accountable. How many performance goals were exceeded in the last permit cycle? What actions, if any, were taken by the Regional Board and the Permittee? Plainly, performance goals are extremely ineffective and should be replaced with effluent limitations that prevent backsliding and will ensure the Permittee takes appropriate actions to meet water quality objectives.		X	Regional Board staff disagree. The Ocean Plan allows the use of dilution factors, thus, in most cases, the calculated limits are orders-of-magnitude higher than the actual levels in the discharge. Effluent limitations alone will not be effective as a control mechanism. For constituents having reasonable potential to exceed water quality objectives or having inconclusive results in reasonable potential analyses, effluent limitations were prescribed. In most cases, for constituents with effluent limitations, the performance goals with much lower values than effluent limitations were also prescribed. The performance goals only require the discharger to maintain its current level of treatment. They are not enforceable limits. When exceeded, they serve as triggers to the discharger to investigate the cause so that proper operation of the plant is maintained and source control measures are properly implemented. The exceedance of any performance goal is not expected to have substantial impact on the ocean environment. However, the use of performance goals supports the antidegradation policy in that it at least maintains the level of pollutants discharged to the receiving water.	None necessary
	If the Regional Board fails to replace these ineffective performance goals with effluent limitations, it should, at a minimum, modify the performance goal provisions in the Tentative Permit that allow effluent quality to *decrease*. Several performance goals in the Tentative Permit have increased from		X	Regional Board staff disagee. The Performance Goal calculation used in the tentative Order is different from that used in the current Order No. R4-2002-0129. This Performance Goal calculation follows protocols used in the recently adopted NPDES permit for the County Sanitation District of Los Angeles County's	None necessary

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	the values in Order No. R4-2002-0129. For example, performance goals for arsenic, copper, lead, selenium, cyanide, chlorine residual, ammonia as N, endosulfin, endrin, tributyltin, and 2,4, 6-trichlorophenolare are all higher in the Tentative Permit. Perhaps most concerning are the constituents which have performance goals in the tentative permit which are higher than the effluent limitations they have under the current permit. These constituents include: bis(2-chloroethyl) ether, chlordane, DDT, 3,3'-Dichlorobenzidene, dieldrin, 1,2-Diphenylhydrazine, heptachlor, hexachlorobenzene, N-Nitrosodi-N-propylamine, PAHs, and toxaphene.			Joint Water Pollution Control Plant, Order No. R4-2006-0042. To take the advantage of the minimum levels listed in the 2005 Ocean Plan and to maintain consistence in the future NPDES permit with the ocean discharge, five times the minimum level (instead of the reporting limit used in the current permit) was prescribed as performance goal for some constituents consistently having nondetectable data (see the tentative permit for details). Because of this new approach, some performance goals are higher in the tentative permit. Once again, the performance goals are not limits. When exceeded, they serve as triggers to the discharger to investigate the cause so that proper operation of the plant is maintained and source control measures are properly implemented. Since effluent limitations are usually orders-of-magnitude higher than minimum levels, the use of minimum levels as performance goals are overly conservative. This application may result in many reported exceedances of performance goal that imply little or no environmental impact.	
	In addition, the performance goals for DDT and chlordane are listed as different numbers in the tentative permit (page 17) and Attachment F (F-26). Judging from the calculations being used, it seems that the numbers listed in Attachment F are correct, and the ones in the Tentative Permit are typos, but this needs to be clarified.	X		Regional Board staff agree. Typos on the tentative permit have been corrected. Performance goals of chlordane and DDT on Page 17 have been replaced with 0.5 µg/L and 0.25 µg/L, respectively.	Changes have been made.
	Clearly, the performance goal calculation methodology is inappropriate, as it allows a discharger to decrease their effluent quality and does not allow for the most protective approach. For instance, for constituents where monitoring data have consistently shown nondetecable levels (less than 20 percent detectable data) over the designated monitoring period, the Regional Board sets the performance goal at five times the detectable limit (Tentative Permit at F-30). This calculation approach is inappropriate. The more conservative approach would be to set the performance goal *at the reporting limit*.		X	Regional Board staff disagree. Please see "Response to Comments" above.	None necessary
	Furthermore, why are there no performance goals established for daily maximums or instantaneous maximums?		X	Performance goals established for daily maximum or instantaneous maximum could be far more higher than those	None necessary

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	In addition, there is no performance goal listed for chromium in the tentative permit (Tentative Permit at 15), but later in the permit there is a performance goal of 8 µg/L described for chromium (VI) (Tentative Permit at F-30). Is the omission of the performance goal on page 15 a typo?	X		established for monthly average. Therefore, there are no performance goals for daily maximum or instantaneous maximum. The performance goal for chromium (III) has been added as 8 µg/L. The performance goal for chromium (VI), which is 8 µg/L, is correct.	Change has been made.
2.	**Effluent Monitoring Frequency** For 26 monitoring constituents,[1] the frequency of effluent monitoring decreases in the tentative permit compared to the current permit. The justification given is that "previous monitoring data for these pollutants indicate that the discharge did not demonstrate reasonable potential to exceed water quality standards" (Tentative Permit at F-34). Because the frequency is reduced from quarterly to semiannual monitoring for most of these constituents, it is less likely that exceedances will be detected if they do occur. In addition, sewage influent quality can vary considerably, especially in a quickly growing urban area like Oxnard. Thus, it is inappropriate to be relaxing the monitoring frequency and enforceable effluent limitations when the influent quality and flow to the plant is likely to change and vary. We recommend leaving the monitoring frequencies in the current permit untouched.		X	Regional Board staff disagree. In all adopted NPDES permits, Regional Board staff reduced the monitoring frequency for the certain constituents, which did not show the reasonable potential to exceed the water quality objectives. In the mean time, the monitoring frequency for those constituents showing the reasonable potential to exceed the water quality objectives would be increased. There are no any effluent violations including monthly chronic toxic test results since August 2002. Therefore, the effluent monitoring frequency for the chronic toxicity should be reduced from monthly to quarterly. However, the minimum frequency of effluent analysis for the chronic toxicity remains at "monthly", because the chronic toxicity tests will detect any constituent, or combination of constituents, that may be present and adversely effect marine biota, not detected by routine laboratory testing. Regional Board staff believe that the monthly chronic toxic effluent monitoring program will screen unexpected toxicants appearing in the effluent and make up a "loophole" not covered by the reduced monitoring frequency on 26 constituents. In addition, if there are any effluent violations on these constituents, the Executive Officer will issue a letter increasing the monitoring frequency for these constituents.	None necessary
3.	**Whole Effluent Toxicity Testing**				

[1] ammonia nitrogen, arsenic, cadmium, chromium VI, copper, lead, mercury, nickel, silver, zinc, cyanide, chlorinated and non-chlorinated phenolic compounds, aldrin, dieldrin, chlordane, endrin, toxaphene, PAHs, acrylonitrile, bis(2-chloroethyl)ether, 3,3-dichlorobenzidine, 1,2-diphenyl-hydrazine, heptachlor, hexachlorobenzene, and n-nitrosodi-n-propylamine (Tentative Permit at F-33 to F-34.)

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	The Tentative Permit provides a 99 TUc "trigger" in accordance with State Board Order NO. WQO 2003-0012 which defers the issue of numeric chronic toxicity limits until a later date. The Regional Board should encourage the State Board to develop an appropriate numeric chronic toxicity limit as soon as possible. Too many major NPDES permits have gone forward without numeric effluent limits for chronic toxicity. As you would likely agree, toxicity limits are the safety net for NPDES permits because permits do not require monitoring or have limits for all constituents that can cause receiving water toxicity. An effluent limit of 99 TUc (1 TUc after initial dilution) would protect beneficial uses and meets the narrative toxicity objective set forth in the 2005 California Ocean Plan. Toxicity testing is the safety net for NPDES permits because permits do not require monitoring or have limits for all constituents that can cause receiving water toxicity.			Regional Board staff disagree. The chronic toxicity value of 99 TUc in not a trigger, it is a numeric, enforceable limitation. Based on the 2005 Ocean Plan, the tentative permit has prescribed a chronic toxicity effluent limitation of 99 TUc. In addition, a chronic toxicity performance goal was also prescribed based on the performance data reported in the previous permit cycle. The chronic toxicity performance goal will provide an additional safety net for this NPDES permit. Regional Board staff also keep the monthly chronic toxic monitoring (see Response to Comments No.2) as a safety net to protect the receiving water quality and aquatic life in the receiving water.	None necessary
4.	**Fish and Invertebrate Tissue Monitoring Program** We are concerned with the collection and analysis of the fish tissue samples collected annually for the fish tissue monitoring program. The tentative permit says that "*if possible*, for the duration of this permit and order, the same species shall be used at all stations" (Tentative permit at E-23). It then goes on to say that white croaker (*Genyonemus lineatus*) and Speckled sanddab (*Citharichthys stigmaeus*) are the recommended fish species. It is critical, for analysis and comparison purposes over time that the monitoring program uses the same species. The permit specifies that the fish should be the same sex and uniform weight, but the language should be also *require* the same species be used. For example, Hyperion Waste Water Treatment Plant specifies the use of hornyhead turbot for its fish bioaccumulation monitoring (Order No. R4-2005-0020 at T-44). Specifically, we recommend deleting the phrase "if possible" from the sentence, "*if possible*, for the duration of this permit and order, the same species shall be used at all stations" (Tentative permit at E-23).	X	X	Regional Board staff partially agree. We agree that it is preferable to utilize the same species for bioaccumulation monitoring over time. However, there are times when the target species may be unavailable. Therefore, we wish to identify alternative species for analysis and allow for the possibility that different species may need to be used at different times.	None necessary

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	In addition, we would like to stress the importance of collecting tissue data for white croaker. As you know, due to the Superfund case addressing DDT and PCB contamination off the Palos Verdes Shelf, there has been substantial monitoring of fish tissue in Santa Monica Bay and San Pedro Bay. However, there has been very little monitoring of fish species, including white croaker, in Orange and Ventura counties. Over the next permit cycle, we recommend requiring a fish tissue study that includes three species, one being white croaker. The study design should be comparable to Los Angeles County Sanitation District's study. This information is imperative for developing appropriate fish consumption guidelines for Southern California.	X	X	Regional Board staff partially agree. Bight '08 will include bioaccumulation monitoring to evaluate human health risks associated with sport fishing. Although the sampling design has not been finalized, the plan is to build upon the extensive monitoring conducted in Santa Monica Bay and San Pedro Bay by NOAA and the California Department of Fish and Game. It probably will include croaker as a target species in the areas north and south of previously monitored regions, as well as other target fish species. The City of Oxnard and other Region 4 dischargers will be expected to participate in this study.	None necessary
	Additionally, it is unclear in the tentative permit exactly where the reference specimens will be collected. The tentative permit specifies that fish and macroinvertebrates will be monitored at the 3 receiving water trawling stations of RWT-001 to RWT-003 (Tentative Permit at E-22). The permit then indicates that "three composite samples shall be analyzed for each of the tissue types (Tentative permit at E-24). Are the three composite samples collected from the three trawling stations? If so, then it would not be appropriate for the references specimens to be taken at the RWT-003, which is labeled as the "reference station" (Tentative Permit at E-24). RWT-003 cannot be both a reference station and a sampling station. This should be clarified in the permit.			We believe that the monitoring requirements are clear. Our intent is for composites of a given species to be collected and analyzed at each of the three stations (i.e., at RWT-001, RWT-002, and RWT-003). Specimens from different stations should not be combined together and specimens from different species should not be combined for analysis. RWT-003 is viewed as the "reference" or "control" station, since it is furthest from the discharge point. However, if the target species are not available at RWT-003, they can be collected from another area even further removed from the discharge point, if necessary.	None necessary
5.	**Water Reuse** As discussed earlier, in a rapidly growing urban area like Oxnard, the demand on the Oxnard WWTP will likely inevitably increase quickly. Does the City of Oxnard have any plans for increasing the market for water reuse?	X		The City currently discharges secondary treated effluent from the Oxnard Wastewater Treatment Plant (WWTP) directly to the City-permitted deep ocean outfall. The City has developed the Groundwater Recharge Enhancement and Treatment (GREAT) Program to be implemented and operated in two phases, so that discharge volume to the Ocean may actually decrease. **Phase 1** would maximize the use of current facilities to meet current water supply deficits. It would produce up to 5 million gallons per day (mgd) of tertiary treated water (upgraded from the current secondary treatment process) and up to 3.8 mgd of	None necessary

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				advanced treated water (primarily for agricultural irrigation). However, a portion of the 5 mgd of tertiary treated water would potentially be available for direct distribution for non-food related landscape irrigation. In addition, a portion of the 3.8 mgd of advanced treated water would be used for groundwater injection during times of low agricultural demand (approximately 3 months per year). Phase 1 would also produce up to 5 mgd of desalted brackish water for potable uses. **Phase 2** of the GREAT Program would expand on the Phase 1 elements described above and could potentially increase production of tertiary treated water up to a total of 32.6 mgd for agricultural irrigation and non-food related landscape irrigation, up to 15.3 mgd for advanced treated water for agricultural irrigation and groundwater injection, and up to 10 mgd of desalted brackish groundwater. However, actual quantities of water that would be produced under Phase 2 are unknown, and will depend on a variety of technical and regulatory issues as well as the level of planned growth that is projected in the City's updated general plan. The GREAT Program is one of the recommended elements of the City's Capital Improvement Program and is designed to meet the City's projected water supply needs through year 2020 (Water System Master Plan, January 2003). This new project is under the review process by this Regional Water Board now and will be regulated with a separate Water Recycling Requirements and Waste Discharge Requirements permit, if the Regional Board adopts the permit in the future.	