

Response to Written Comments
Draft Waste Discharge Requirements
Order No. R1-2020-0002
National Pollutant Discharge Elimination System (NPDES)
for the Loleta Community Services District Wastewater Treatment Facility
Regional Water Quality Control Board, North Coast Region
April 16, 2020

Comment Letter Received

The deadline for submittal of public comments regarding draft Waste Discharge Requirements for Order No. R1-2020-0002, National Pollutant Discharge Elimination System Permit (Draft Permit) for the Loleta Community Services District (Permittee) Wastewater Treatment Facility (Facility) was December 5, 2019. The Permittee requested a fourteen-day extension to provide comments on the NPDES Draft Permit. The Permittee provided timely comments after they were granted the extension. No other comments were received during the public comment period.

Regional Water Board staff met with the Permittee on March 3, 2020 to discuss the Permittee's comments. Responses to comments contained in this document are consistent with the discussion that occurred during the March 3, 2020 meeting.

In this document, the Permittee's comments are summarized, followed by the Regional Water Board staff response. Text to be added is identified by underline and text to be deleted is identified by ~~strike-through~~ in this document. The term "Draft Permit" refers to the version of the permit that was sent out for public comment. The term "Proposed Permit" refers to the version of the permit that has been modified in response to comments and is being presented to the North Coast Regional Water Quality Control Board (Regional Water Board) for consideration.

Permittee Comments

Comment 1: Page 1, Table 1

The Proposed Facility ADWF limit = 0.120 MGD. **Correction Requested:** Projected 2025 ADWF from 2016 WWFP is 0.0535 MGD. We believe 0.120 MGD is in error.

***Response 1:** The Average Dry Weather Flow (ADFW) of 0.12 million gallons per day (MGD) provided in the Report of Waste Discharge submitted by the permittee was erroneously inserted into Table 1 of the Draft Permit for the "proposed upgraded facility design flow". The Proposed Permit has been modified to include an ADWF of 0.0535 MGD for the proposed upgraded facility design flow. 0.12 MGD has been retained in Table 1 to reflect the ADWF for the current Facility.*

Comment 2: Page 1, Table 1

Peak Wet Weather Flow. **Clarification Requested:** Please define Peak Wet Weather Flow. Footnote 1 of Table E-2 of the MRP (Attachment E) states that influent flow shall

be reported as average daily and average monthly flows. Does this mean Peak Wet Weather Flow is the Peak Daily Flow?

Response 2: *Section VII.L. of the Draft Permit states, “The peak daily wet weather flow is the maximum flow rate that occurs over a 24-hour period. Compliance with the peak daily wet weather flow prohibition in section III.H of this Order will be determined daily by measuring the daily average flow at Monitoring Location INF-001. If the measured daily average flow exceeds 0.55 mgd (for current Facility operations), the discharge does not comply with Prohibition III.H of this Order. Once the Facility upgrade is completed, if the measured daily average flow exceeds ~~0.48~~ 0.379 mgd, the discharge does not comply with Prohibition III.H of this Order.”*

The Proposed Permit updates the Peak Wet Weather Flow as discussed in comment 3 below.

Comment 3: Page 1, Table 1

Proposed Facility Peak Wet Weather Flow limit = 0.48 MGD. **Correction Requested:** Projected 2025 Peak Daily Flow from 2016 WWFP is 0.379 MGD. We believe 0.48 MGD is in error.

Response 3: *Table 4-9 of the 2016 WWFP states that the peak daily flow will be 0.379 MGD in 2025. Table 1 and Table F-1 of the Proposed Permit has corrected the peak wet weather flow (PWWF) for the proposed upgraded facility design flow to 0.379 MGD.*

Comment 4: Page 1, Table 1

Peak Wet Weather Flow limit = 0.48 MGD. **Change Requested:** Retain existing facility Peak Wet Weather Flow Limit of 0.55 MGD. **Justification:** Projected Peak Daily Flows from 2016 WWFP assume a certain amount of I/I reduction from collection system repairs but these projections are for basis of design and were not intended to be confident enough for effluent limitations. We are requesting retention of existing facility peak wet weather flow limitations until data can be collected to confirm I/I reduction efforts.

Response 4: *Table 1 of the Proposed Permit contains the PWWF and ADWF for the current Facility and the Proposed Upgraded Facility. All four values will be retained in Table 1 of the Proposed Permit. However, Discharge Prohibition III.H includes the PWWF and ADWF for the existing Facility.*

Comment 5. Page 6, Table 4

Total Chlorine Residual effluent limits decreased from prior Order. **Clarification Requested:** will new lower limits affect the laboratory methods used by LCSD in-house for measuring chlorine residual?

Response 5: *The Draft Permit contains more stringent chlorine residual effluent limitations than the previous chlorine residual effluent limitations in Order No. R1-2014-0013, which required no detectable level of chlorine in the effluent at the point of discharge. The chlorine residual effluent limitations are based on the U.S. EPA Quality Criteria for Water 1986 (The Gold Book, 1986, EPA 440/5-86-001) and have been translated to an AMEL of 0.01 mg/L and an MDEL of 0.02 mg/L in the Draft Permit.*

Table E-3 of the Draft Permit contains Footnote 3 that states, "Pollutants shall be analyzed using the analytical methods described in 40 C.F.R. part 136 or by methods approved by the Regional Water Board or State Water Board, such as with the current edition of Standard Methods for Examination of Water and Wastewater (American Public Health Administration)."

The Permittee must use an appropriate analytical method that can maintain a minimum level of 0.01 mg/L to show compliance with the more stringent total chlorine residual effluent limitation. No changes were made to the Proposed Permit from this comment.

Comment 6: Page 6, Table 4

Carbon Tetrachloride effluent limits retained from prior Order. **Change Requested:** remove effluent limitation for carbon tetrachloride. **Justification:** a single effluent violation occurred on September 13, 2016; no other detection or violation has occurred since that time (37 monthly samples between October 2016 and October 2019). Carbon tetrachloride is tested with 5-year term Priority Pollutant scans.

***Response 6:** Section 1.3 of the SIP discusses the steps required in determining water quality-based effluent limitations for priority pollutants. A Priority Pollutant will have reasonable potential if the Maximum Effluent Concentration (MEC) is greater than the most stringent water quality criterion (C) or if the effluent sample detects the pollutant and the observed maximum ambient background (B) concentration is greater than C.*

The CTR establishes a water quality objective for the protection of human health for carbon tetrachloride of 0.25 µg/L. The Permittee sampled the effluent for carbon tetrachloride 50 times during the term of Order No. R1-2014-0013. Carbon tetrachloride was detected in the effluent at a concentration of 2.5 µg/L. A determination of reasonable potential has been made based on the MEC of 2.5 µg/L exceeding the most stringent water quality objective of 0.25 µg/L.

The Proposed Permit has been modified to include language for tiered monitoring for carbon tetrachloride. Tiered monitoring allows a reduction in the monitoring frequency provided that compliance with effluent limitations is determined for the proposed timeframe. As stated above, the Permittee sampled for carbon tetrachloride 50 times with one exceedance of the effluent limitation. Tiered monitoring is a method used by the Regional Water Board to reduce the cost of compliance through reduced monitoring when constituent detections are minimal.

Table E-3 has been modified to include table note 16 in respect to carbon tetrachloride monitoring. Table E-3 note 16 states "Monitoring may be reduced to annually if the Permittee complies with the effluent limitation, as stated in Order section IV.A.1.a, for 12 consecutive months."

Comment 7: Page 6, Table 4

New Heptachlor final effluent limits established in this order based on a single sample detection. **Change Requested:** include Heptachlor effluent monitoring instead of a Heptachlor final effluent limit. **Justification:** The Heptachlor detection was a single anomalous detection, including it as a final effluent limit may prevent removing it from future effluent limit requirements. Additionally, the LCSD WWTP has no technology in

place for treatment or removal of Heptachlor, and this pollutant was not identified during previous planning studies as a pollutant of concern requiring treatment or removal.

Response 7: *Section 1.3 of the SIP discusses the steps required in determining water quality-based effluent limitations for priority pollutants. A Priority Pollutant will have reasonable potential if the Maximum Effluent Concentration (MEC) is greater than the most stringent water quality criterion (C) or if the effluent sample detects the pollutant and the observed maximum ambient background (B) concentration is greater than C.*

The CTR establishes a water quality objective for the protection of human health for heptachlor of 0.00021 µg/L. The Permittee sampled the effluent for heptachlor once during the term of Order No. R1-2014-0013. Heptachlor was detected in the effluent at a concentration of 0.023 µg/L. A determination of reasonable potential has been made based on the MEC of 0.023 µg/L exceeding the most stringent water quality objective of 0.00021 µg/L.

The Proposed Permit has been modified to include language for tiered monitoring for heptachlor. Tiered monitoring allows a reduction in the monitoring frequency provided that compliance with effluent limitations is determined for the proposed timeframe. The Permittee sampled for heptachlor one time during their priority pollutant scan and had one exceedance of the human health criteria for heptachlor. Tiered monitoring is a method used by the Regional Water Board to reduce the cost of compliance through reduced monitoring when constituent detections are minimal

Table E-3 has been modified to include table note 16 in respect to heptachlor monitoring. Table E-3 note 16 states “Monitoring may be reduced to annually if the Permittee complies with the effluent limitation, as stated in Order section IV.A.1.a, for 12 consecutive months.”

Comment 8: Page 6, Table 4

Ammonia Impact Ratio (AIR) limit is shown in units of mg/L. **Correction Requested:** show units of AIR as “NA”. **Justification:** AIR is a unitless ratio.

Response 8: *The suggested correction to Table 4 has been made to the Proposed Permit.*

Comment 9: Page 7, Section IV.C.1.

Authorized Recycling Water Location refers to Attachment B-2, map of the land application site, which incorrectly identifies the Rice property as the proposed land application area. **Correction Requested:** map should show currently proposed land application site of the Renner property included in preliminary anti-degradation analysis (May 2018, SHN). **Justification:** The Rice property was the initially proposed land application area that has since been changed to the Renner property.

Response 9: *The Proposed Permit has been modified to recognize Attachment B-4 as the land application site in the Authorized Recycling Water Location and Attachment B-4 has been updated to use the Renner Property image from the 2018 Anti-Degradation Analysis.*

Comment 10: Page 9, Section IV.C.3.j.v.

Requires that irrigation of recycled water cease during precipitation events. **Change Requested:** LCSD will cease irrigation during precipitations events if ponding is observed in the irrigated land application area. **Justification:** If the precipitation event is small enough that ponding does not occur, we are requesting that LCSD be allowed to continue irrigation unless ponding is observed.

Response 10: *Section IV.C.3.j.v of the Draft Permit states, “Where appropriate, practices and strategies to prevent the occurrence of runoff shall include, but not be limited to: Refraining from irrigation during precipitation events.”*

Title 22 section 60310(e) states, “) Any use of recycled water shall comply with the following: (1) Any irrigation runoff shall be confined to the recycled water use area, unless the runoff does not pose a public health threat and is authorized by the regulatory agency. (2) Spray, mist, or runoff shall not enter dwellings, designated outdoor eating areas, or food handling facilities. (3) Drinking water fountains shall be protected against contact with recycled water spray, mist, or runoff.”

The intent of Section IV.C.3.j.v. in the Draft Permit is to minimize runoff of recycled water when a precipitation event occurs. Therefore Section IV.C.3.j.v. of the Proposed Permit has been modified to state, “Refraining from irrigation that would cause runoff of recycled water from the recycled water use area during precipitation events.”

Comment 11: Page 10, Section IV.D.

States: “Other Requirements – Not Applicable.” **Correction Requested:** remove “Not Applicable.” **Justification:** this section includes other requirements and should not state that it is “not applicable”.

Response 11: The recommended change has been made to the Proposed Permit.

Comment 12: Page 11, Section IV.D.2.a.

States that turbidity is to be measured following filtration. **Correction Requested:** remove requirement for turbidity monitoring and language regarding filtration.

Justification: there is no filtration process included in the proposed LCSD WWTP because it is not a tertiary treatment facility.

Response 12: *Section IV.D.2.a of the Proposed Permit has been modified as follows:*

“Provide continuous, reliable monitoring of flow, UV transmittance, UV intensity, UV dose, and UV power at Monitoring Location INT-002_ ~~and turbidity following the filtration process.~~”

Comment 13: Page 11, Section IV.D.2.c.

States that UVT shall not fall below 55% of maximum at any time. **Clarification Requested:** what is “maximum” UVT referring to?

Response 13: *Maximum UV Transmittance (UVT) refers to 100% UVT through a pure water sample, such as deionized water. That is, the intensity of light after passing through the water column is the same as the intensity of light at the source.*

Comment 14: Page 11, Section IV.D.2.f.i.

Refers to “tertiary turbidity.” **Change Requested:** remove reference to tertiary turbidity. **Justification:** There is no filtration process included in the proposed LCSD WWTP because it is not a tertiary treatment facility.

Response 14: *The “tertiary turbidity” language has been removed from Section IV.D.2.f.i-ii of the Proposed Permit.*

Comment 15: Page 11, Section IV.D.2.f.ii

Same as Comment 14 above.

Response 15: *See Response 14 above.*

Comment 16: Page 12, Section IV.D.2.f.v.

Refers to procedure for diverting “non-compliant effluent” from receiving water or the recycled water system. **Change Requested:** change “non-compliant effluent.” **Justification:** INT-002 is disinfected UV effluent, which is not specific to recycled water.

Response 16: *The recommended change has been made to the Proposed Permit.*

Comment 17: Page 12, Section V.A.1.

Refers to “natural conditions” of receiving water body with respect to potentially unachievable DO concentrations. Footnote further defines natural conditions as those conditions “not influenced by past or present anthropogenic activities.” **Clarification Requested:** Please clarify whether natural conditions exist at receiving water monitoring locations.

Response 17: *The Regional Water Board has not made a determination on whether natural conditions exist that could make aquatic-life DO requirements unachievable to meet in the lower Eel River. Until such determination is made, the discharge shall not cause the DO of the receiving water to be depressed below 9 mg/L. No changes have been made to the Proposed Permit in response to this comment.*

Comment 18: Page 12, Section V.A.1.

Refers to “dry season” and “wet season” DO saturation. **Clarification Requested:** Please define “dry season” and “wet season.”

Response 18: *The “dry season” coincides with the May 15 through September 30 discharge prohibitions season while the “wet season” coincides with the October 1 through May 14 discharge season.*

Comment 19: Page 12, Section V.A.1.

States that “In no event may controllable factors reduce the daily minimum DO below 6 mg/L. **Clarification Requested:** please define “controllable factors.”

Response 19: *Controllable factors include but are not limited to the Permittee’s effluent discharge to the river. The Basin Plan defines controllable factors as: Controllable water quality factors are those actions, conditions, or circumstances resulting from man’s activities that may influence the quality of the waters of the State and that may be reasonably controlled.”*

Comment 20: Page 13, Section V.A.3.

Refers to receiving water specific conductance limits. **Clarifications Requested:** Please clarify the source of receiving water specific conductance limits.

Response 20: *The specific conductance receiving water limitations are from Eel River Hydraulic Unit in Table 3-1 of the North Coast Basin Plan.*

Comment 21: Page 15, Section V.B.5.

Refers to coliform limits in groundwater. **Clarification Requested:** Please clarify how coliform organism presence or concentration in groundwater from disposal of treated and disinfected effluent can be differentiated from that of wildlife or livestock.

Response 21: *Sources of coliform in ground water will be established by properly siting monitoring wells with at least one up-gradient and two down-gradient monitoring wells to better determine the source of possible groundwater contamination.*

Comment 22: Page 16, Section VI.C.1.e

States that a site-specific WER for copper of 2.41 has been used as further described in section IV.C.3 of the Fact Sheet. Section IV.C.3.c of the Fact Sheet including the Reasonable Potential Determination for copper states that the default WER of 1.0 was used in determining the applicable chronic and acute criteria for copper. **Correction Requested:** Please correct either section VI.C.1.e to reflect the default WER of 1.0 used for determination of copper toxicity criteria, or Section IV.C.3. c of the Fact Sheet to reflect the copper WER of 2.41 as stated previously. **Clarification Requested:** If the copper WER of 2.41 is the correct WER, please explain how this was determined.

Response 22: *The WER of 2.41 was a misprint. A default WER of 1.0 is correct. Section VI.C.1.e of the Proposed Permit has been corrected.*

Comment 23: Page 17, Section VI.C.2.a

Freshwater Mussel Study Workplan and Report (Ammonia Study). **Clarification Requested:** If the proposed new WWTF effluent AIR is below 1 at all times, based on the ammonia criteria that assume the presence of freshwater mussels included in Attachment H, can LCSD abstain from conducting a freshwater mussel presence/absence study without establishing the presumption of the presence of freshwater mussels?

Response 23: *The ammonia criteria listed in Attachment H is assuming salmonids are the most sensitive species and not freshwater mussels. The Permittee may accept the presence of freshwater mussels in the Lower Eel River and not perform the Ammonia Study if they believe that the upgraded facility can meet the more stringent AIR using the freshwater mussels as the most sensitive species.*

Comment 24: Page 17, Section VI.C.2.b

Recycled Water BMP/Operations and Management Plan. **Clarification Requested:** How does the Recycled Water BMP/Operations and Management Plan differ from the Title 22 Recycled Water Engineering Report? Can these two reports be combined into a single report?

Response 24: *The Recycled Water BMP/Operations and Management Plan has been removed from the Proposed Permit. Title 22 Engineering Report sufficiently outlines the operations and practices the Permittee will implement to manage the recycled water quality and application. The Proposed Permit also requires the Title 22 Engineering Report to be approved by the Division of Drinking Water (DDW) before any discharge to the recycled water use site can commence.*

Comment 25: Page 23, Section VI.C.5.e

State that “In lieu of a properly certified wastewater treatment facility operator, the State Water Board may approve use of a water treatment facility operator of appropriate grade certified by DDW where water recycling is involved.” **Clarification Requested:** Will a DDW certified operator need the same wastewater operator certifications as the current operators at LCSD?

Response 25: *Title 23, Section 3670.1(b) of the California Code of Regulations (CCR) states;*

(b) A person certified by the California Department of Public Health as a water treatment plant operator may operate a water recycling treatment plant at a grade level appropriate for the class of wastewater treatment plant being operated as set forth in sections 3680 and 3680.1.

(1) For the purpose of this subdivision, a water treatment plant operator certificate is equivalent to a wastewater treatment plant operator certificate as follows:

Certificate Requirements for Water Recycling Treatment Plants

<i>Wastewater Treatment Plant Classification</i>	<i>Water Treatment Plant Operator Certificate</i>	<i>Wastewater Treatment Plant Operator Certificate</i>
<i>I</i>	<i>T1</i>	<i>Grade I</i>
<i>II</i>	<i>T2</i>	<i>Grade II</i>
<i>III</i>	<i>T3</i>	<i>Grade III</i>
<i>IV</i>	<i>T4</i>	<i>Grade IV</i>
<i>V</i>	<i>T5</i>	<i>Grade V</i>

A DDW certified operator may be approved by the State Water Board for recycled water operation. The Office of Operator Certification would have final approval over the appropriate grade of the operator and Regional Water Board staff will not be involved in that process.

Title 23, Section 3680(b) of the CCR states;

“Except as provided in section 3680.2, a chief plant operator shall appoint a certified operator to be the designated operator-in-charge for any period of time during which the

chief plant operator is unable to carry out the responsibilities of the position of “chief plant operator” as defined in section 3671.”

Comment 26: Page 26, Section VII.K

Proposed Facility ADWF = 0.120 MGD. **Correction Requested:** Same as Comment 1

Response 26: See Response 1.

Comment 27: Page 26, Section VII.L

Proposed Facility PWWF = 0.48 MGD. **Clarification Requested:** Same as Comment 3.

Response 27: See Responses 2 and 3 above.

Comment 28: Page B-3, Figure B-3

Figure incorrectly identifies Influent Pump Station as “Land Application Pump Station.”

Correction Requested: Please replace Figure B-3 with corrected SHN Figure.

Response 28: *The Permittee submitted a new figure on March 4, 2020. Attachment B-3 has been changed to the correct figure as requested by the Permittee.*

Comment 29: Page B-4, Figure B-4

Figure incorrectly identifies Proposed Land Disposal Area as the Rice Property.

Correction Requested: Please replace Figure B-4 with updated SHN figure showing proposed land disposal area as the Renner Property to the north.

Response 29: *The requested change has been made to the Proposed Permit.*

Comment 30: Page E-3, Table E-1

Monitoring Location Description for RSW-001 and RSW-002 described as “representative upstream receiving water monitoring location approved by the Executive Officer” and “representative downstream receiving water monitoring location approved by the Executive Officer,” respectively. **Comment:** Further discussion of appropriate receiving water sampling locations is anticipated between LCSD and RWQCB prior to final determination of representative sampling locations.

Response 30: *Since the Permittee discharges to a seasonally dry wetland that is a tributary to Ropers Slough, receiving water monitoring for RSW-001 and RSW-002 shall be conducted in the Eel River upstream and downstream of where the back channel enters the main stem of the Eel River.*

Table E-1 of the MRP in the Proposed Permit has been modified as follows:

--	RSW-001	<u><i>Representative upstream receiving water monitoring location approved by the Executive Officer. Upstream receiving water monitoring location in the Eel River upstream of where Ropers Slough enters the Eel River</i></u>
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--	RSW-002	Representative downstream receiving water monitoring location approved by the Executive Officer <u>Downstream receiving water monitoring location in the Eel River where Ropers Slough enters the Eel River.</u>
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Comment 31: Page E-5, Table E-3

Acute Toxicity Minimum Sampling Frequency defined as Annual. **Correction**

Requested: Remove reference to footnote 6, which refers to “Accelerated monitoring (monthly frequency).” We believe this reference is in error.

Response 31: *The Proposed Permit has been modified as proposed.*

Comment 32: Page E-7 and E-10, Section V.A.7. and V.B.7 of the MRP

Acute Toxicity Notification (Section V.A.7) states that the Permittee shall notify the Board of a test failure following “receipt of test results,” and Chronic Toxicity Notification (Section V.B.7) states that the Permittee shall notify the Board of a test failure following “receipt of result.” **Clarification Requested:** Does “receipt of test results” and “receipt of results” mean the same thing? **Clarification Requested:** Does this mean receipt of preliminary test results from email or telephone communication, or receipt of the final test result report?

Response 32: *The language mentioned in comment 32 above does mean the same thing. The language has been modified in section V.B.7 of the MRP in the Proposed Permit to state, “receipt of test results”. Regional Water Board staff encourages the Permittee to submit any preliminary results to aid staff in determining if the Test Acceptability Criteria was met and to determine the appropriate path forward (i.e., accelerated monitoring, TRE, TIE). The final report is also required to be submitted upon receipt.*

Comment 33: Page E-17, Table E-7

Weekly minimum sampling frequency for E. coli. **Change Requested:** Monthly minimum reporting frequency for E. coli at Monitoring Location RSW-002 (downstream receiving water monitoring location). **Justification:** RSW-001 (upstream receiving water monitoring location) will be sampled monthly and effluent (EFF-001) sampling for E. coli will be conducted weekly; monthly sampling at RSW-002 will be sufficient to determine potential impacts to receiving water quality due to discharges.

Response 33: *The proposed modification has been made to the Proposed Permit.*

Comment 34: Page E-18, Section IX.B.2 of the MRP

Footnote 2 refers to “annual sampling identified in Footnote 4 of this table.” Table E-8 does not contain footnote 4. **Correction Requested:** remove reference to footnote 4 in this table, which does not exist. We believe this reference was made in error.

Response 34: Footnote 2 in Table E-8 of the Proposed Permit has been modified as follows, “Quarterly sampling shall occur in February, mid-May, July, and October. ~~The mid-May sampling shall coincide with the annual sampling identified in Footnote 4 of this table.~~”

Comment 35: Page E-18, Section IX.B.2.b of the MRP

Correction Requested: change Section IX.B.2 to IX.B.1. This section starts with subsection number 2. We believe this was made in error.

Response 35: The section has been updated appropriately in the Proposed Permit

Comment 36: Page E-18, Section IX.B.2.b of the MRP

States that flow through UV system shall not exceed 0.95 mgd average daily flow.

Change Requested: remove limitation for flow through the UV system. **Justification:** average daily flow projections for the proposed facility are based on reductions to I/I. I/I reduction projections are for design purposes and are not confident enough for permit limitations.

Response 36: Section IX.B.2.b of the MRP has been modified to state, “Flow through the UV disinfection system shall not exceed the 0.95 mgd as a daily average flow established in the DDW approved Title 22 Engineering Report, unless otherwise approved by DDW

Comment 37: Page F-4, Section II

States that the Cheese Factory discharge is regulated under District Ordinance No. 76-01, Article 8, Section 3.8. **Correction Requested:** two new ordinances further regulate the discharge from the Cheese Factory: 17-01 and 19-02.

Response 37: Section II of the Fact Sheet in the Proposed Permit has been modified as follows, “This discharge from the factory into the WWTF is regulated under District Ordinances No. 17-01, 19-02 and 76-01, Article 8, Section 3.8.”

Comment 38: Page F-4, Section II

States that there are four commercial users: Cheese Factory, laundromat, deli, and brewery. **Correction Requested:** there are two commercial users currently: Cheese Factory and a meat market.

Response 38: Section II of the Fact Sheet in the Proposed Permit has been modified as follows, “and ~~four~~ two commercial users including the Loleta Cheese Factory, ~~a laundromat, a small deli, and a brewery~~ meat market.”

Comment 39: Page F-5, Section II.A.3

Time Schedule Order incorrectly identified as Order No. R1-2019-0041. **Correction Requested:** Please change TSO to R1-2020-0003. We believe this is in error.

Response 39: Section III.A.3. of the Fact Sheet in the Proposed Permit has been modified as follows, “Therefore, the existing CDO will be rescinded and a new Time Schedule Order No. R1-201920-004102 will be issued, with tasks and a new compliance schedule, concurrent with the adoption of this Order.”

Comment 40: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Effluent Limitation, Maximum Daily Flow” listed as 0.143 MGD; footnote 2 states that this is a maximum monthly wet weather flow limitation (as listed in the prior permit).

Correction Requested: Please move the 0.143 MGD to “Average Monthly” column as this was not the maximum daily flow limitation. We believe this is an error.

Response 40: *Table F-2 has been modified in the Proposed Permit to include the ADWF of 0.081 mgd and the previous AWWF of 0.143 mgd. An extra row was inserted under the previous flow row to include both ADWF and AWWF.*

Comment 41: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, BOD, mg/L” shows 83 mg/L. Based on 34 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 39 mg/L. **Correction**

Requested: Please change to 39 mg/L. We believe this is in error.

Response 41: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates shows the highest monthly BOD mg/L was 180 mg/L and occurred in April 2017. Table F-2 has been modified in the Proposed Permit to state the correct value of 180 mg/L.

Comment 42: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Weekly Discharge BOD, mg/L” and “Highest Daily Discharge, BOD, mg/L” shows 285 mg/L. Based on 147 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 253 mg/L. **Correction Requested:** Please change these two values to 253 mg/L. We believe this is in error.

Response 42: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest weekly BOD was 285 mg/L on January 14, 2016. Therefore, no changes were made to the Proposed Permit from comment 42.

Comment 43: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, BOD, lbs/day” shows 216 lbs/day. Based on 34 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 33 lb/day.

Correction Requested: Please change this value to 33 lbs/day. We believe this is in error.

Response 43: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data verifies that the highest monthly BOD lbs/day was 216 lbs/day in January 2016. Therefore, no changes were made to the Proposed Permit from comment 43.

Comment 44: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Weekly Discharge, BOD, lbs/day” and “Highest Daily Discharge, BOD, lbs/day” shows 789 lbs/day. Based on the 37 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 84 lbs/day. **Correction Requested:** Please change these two values to 84 lbs/day. We believe this is in error.

Response 44: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest weekly BOD lbs/day was 789 lbs/day on January 14, 2016. Therefore, no changes were made to the Proposed Permit from comment 44.

Comment 45: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, TSS, mg/L” shows 170 mg/L. Based on 34 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 37 mg/L. **Correction Requested:** Please change to 37 mg/L. We believe this is in error.

Response 45: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest monthly TSS mg/L was 170 mg/L in January 2016. Therefore, no changes were made to the Proposed Permit from comment 45.

Comment 46: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Weekly Discharge, TSS, mg/L” and “Highest Daily Discharge, TSS, mg/L” shows 582 mg/L. Based on 148 values reported during this time., as reported in SMRs (downloaded from CIWQS), the highest value was 45 mg/L. **Correction Requested:** Please change these two values to 45 mg/L. We believe this is in error.

Response 46: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest weekly TSS mg/L was 582 mg/L on January 14, 2016. Therefore, no changes were made to the Proposed Permit from comment 46.

Comment 47: Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001 47. “Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, TSS, lbs/day” shows 444 lbs/day. Based on 34 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 24 lbs/day. **Correction Requested:** Please change this value to 24 lbs/day. We believe this is in error.

Response 47: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest monthly TSS lbs/day was 444 lbs/day in January 2016. Therefore, no changes were made to the Proposed Permit from comment 47.

Comment 48. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Weekly Discharge, TSS, lbs/day” and “Highest Daily Discharge, TSS, lbs/day” shows 1,612 lbs/day. Based on 148 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 82 lbs/day. **Correction Requested:** Please change these two values to 82 lbs/day. We believe this is in error.

Response 48: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest weekly TSS lbs/day was 1,612 lbs/day on January 14, 2016. Therefore, no changes were made to the Proposed Permit from comment 48.

Comment 49. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Daily Discharge. pH” shows a maximum of 8.4 s.u. Based on 147 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 8.2 s.u. **Correction Requested:** Please change this value to 8.2 s.u. We believe this is in error.

Response 49: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the maximum pH was 8.2 SU on July 26, 2017. Table F-2 has been modified in the Proposed Permit as requested in comment 49.

Comment 50. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, Settleable Solids” shows a maximum of 7.6 ml/L. No data were reported during this time, as reported in SMRs (downloaded from CIWQS). **Correction Requested:** Please change this value to “NR.” We believe this is in error.

Response 50: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest average monthly settleable solids was 7.6 ml/L in January 2016. Therefore, no changes were made to the Proposed Permit from comment 50.

Comment 51. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Daily Discharge, Settleable solids” shows a maximum of 25 ml/L. Based on 147 samples reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 1.0 mg/L. **Correction Requested:** Please change this value to 1.0 ml/L. We believe this is in error.

Response 51: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest daily settleable solids was 25 ml/L on January 14, 2016. Therefore, no changes were made to the Proposed Permit from comment 51.

Comment 52. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, Copper, Total Recoverable” and “Highest Daily Discharge, Copper, Total Recoverable” shows a maximum of 25 ug/L. Based on 35 values reported during time, as reported in SMRs (downloaded from CIWQS), the highest value was 23 ug/L. **Correction Requested:** Please change these two values to 23 ug/L. We believe this is in error.

Response 52: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest average monthly copper result was 25 ug/L in December 2015. Therefore, no changes were made to the Proposed Permit from comment 52.

Comment 53. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, Carbon Tetrachloride” and “Highest Daily Discharge, Carbon Tetrachloride” shows a maximum of 2.5 ug/L. Based on the 35 values reported during this time, as reported in SMRs (downloaded from CIWQS), the highest value was 2.4 ug/L. **Correction Requested:** Please change the two values to 2.4 ug/L. We believe this is in error.

Response 53: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest average monthly carbon tetrachloride sample was 2.5 ug/L in June 2014. Therefore, no changes were made to the Proposed Permit from comment 53.

Comment 54. Page F-7, Table F-2 Historic Effluent Limitations and Monitoring Data – Discharge Point 001

“Monitoring Data (March 2015 – November 2018), Highest Average Monthly Discharge, Chlorodibromomethane” shows a maximum of 7.5 ug/L. Samples collected monthly such that we believe this value should be the same as the “Highest Daily Discharge, Chlorodibromomethane” of 8.8 ug/L. **Correction Requested:** Please change this value to 8.8 ug/L. We believe this is in error.

Response 54: *Table F-2 in the Draft Permit states the incorrect range of dates. The monitoring data used to develop this permit was from June 1, 2014 through February 28, 2019. The dates have been corrected in the Proposed Permit.*

Monitoring data submitted between these dates verifies that the highest average monthly chlorodibromomethane result was 8.8 ug/L in August 2018. Table F-2 has been modified in the Proposed Permit to state the correct value of 8.8 ug/L.

Comment 55: Page F-8, Section II.D of the Fact Sheet

States that the ACL Compliant (R1-2018-0026) assessed a penalty in the amount of \$375,000. **Correction Requested:** ACLC R1-2018-0026 is in the amount of \$330,000. We believe this is in error.

Response 55: *ACLC R1-2018-0026 originally had a penalty amount of \$375,000. Proposed Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order No. R1-2020-0008 resulted in the amount being reduced to \$330,000. Therefore, the Proposed Permit has been modified to include the amount of \$330,000.*

Comment 56: Page F-17, Section IV.A.9 of the Fact Sheet

States that “The original intent of this prohibition was to prevent the contribution of wastewater to the baseline flow of the Russian River....” **Correction Requested:** Please change reference from “Russian River” to “Eel River.” We believe this is in error.

Response 56: *The requested change has been made to the Proposed Permit.*

Comment 57: Page F-23, Section IV.C.3.a.vi

States that “The Facility is designed to use nitrification to remove ammonia from the waste stream and denitrification to reduce nitrate in the waste stream culminating in an overall reduction in total nitrogen.” **Correction Requested:** Please remove reference to denitrification; the current facility is not designed for denitrification to obtain total nitrogen reduction. We believe this is in error.

Response 57: *The Proposed Permit has been modified as follows, “The current Facility is designed to use nitrification to remove ammonia from the waste stream. The proposed Facility upgrade will be designed to use nitrification to remove ammonia and*

denitrification to reduce nitrate in the waste stream culminating in an overall reduction in total nitrogen.”

Comment 58: Page F-40, Section IV.G.1.e

States that “The specific limitations are those levels of bacteria required for the recycled water use of treated wastewater for surface irrigation of (i) pasture used for animals producing milk for human consumption and (ii) any nonedible vegetation where access is controlled.” **Clarification Requested:** We are proposing to discharge to land used for grazing beef cattle, not dairy cattle. Why is the limit being imposed on dairy cattle grazing?

Response 58: *The total coliform is not based on dairy cattle grazing but is based on secondary treatment standards. The above language should state “non-dairy producing” animals. If the Permittee was to have dairy producing animals grazing on the recycled water use site, then the monitoring frequency for total coliform would be increased to daily instead of the weekly frequency in the Proposed Permit.*

The Proposed Permit has been modified as follows, “The specific limitations are those levels of bacteria required for the recycled water use of treated wastewater for surface irrigation of (i) pasture used for non-dairy producing animals ~~producing milk for human consumption~~ and (ii) any nonedible vegetation where access is controlled.

Comment 59: Page F-47, Section VII.B.1.d

States that “Quarterly effluent monitoring for total mercury has been established in this Order to verify that the SUB beneficial use is being protected and is consistent with the Statewide Mercury Provisions.” **Clarification Requested:** Table F-3 of the Fact Sheet does not identify SUB as a beneficial use. Is the SUB beneficial use coincident with the CUL beneficial use category?

Response 59: *The State Water Board’s Final Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California—Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions (Statewide Mercury Objectives) established three new beneficial use definitions for use by the State and Regional Water Boards in designating Tribal Traditional Culture (CUL), Tribal Subsistence Fishing (T-SUB), and Subsistence Fishing (SUB) beneficial uses to inland surface waters, enclosed bays, or estuaries in the state. The North Coast Basin Plan contains the Native American Cultural (CUL) use and Subsistence Fishing (FISH) beneficial uses. The statewide beneficial use definitions do not supersede those in the North Coast Basin Plan. The Basin Planning unit is working to make the beneficial use categories of the Basin Plan consistent with the Statewide Mercury Provisions.*