

Attachment C - MRR R3-2008-0069 COMMENTS

State of California Department of Public Health¹ (DPH) COMMENTS

MASTER RECLAMATION REQUIREMENTS (MRR) A.5 and B1 COMMENT: Item 5 notes that the “Hourly flow rates through the DWTP treatment system surpassing the capacity of the chlorine contact basin or online membrane train is prohibited.” However, in Section B, Specifications, Item 1 specifies that the monthly average influent wastewater flow shall not exceed 4.0 MGD. The Department recommends that both be changed to “daily average” to be consistent with performance monitoring frequency requirements and the *City of Hollister Title 22 Engineers Report for Production, Distribution and Use of Recycled Water*, April 2008 (Engineer's Report).

RESPONSE DPH NO. 1: Water Board staff has modified wording in sections A.5 and B.1 of the proposed MRR to indicate a daily average flow rate as the measurement for prohibition A.5 and for specification B.1.

MRR A.10 COMMENT: Item 10 specifies that reduced pressure principle backflow prevention devices must be provided at all premises where recycled water is used and there is no interconnection with the potable water system. This prohibition is consistent with Cross Connection Control regulations found in Title 17, CCR. However, the footnote (2) for Item 10 states that, “This requirement does not apply to individual residences using recycled water for landscape irrigation...” The reader may interpret this to mean that backflow prevention is not necessary at individual residences. To clarify, Title 17, CCR requires that, as a minimum, a double check backflow prevention device be used at these sites or the implementation of a Department-approved alternative backflow protection plan. The Department recommends that the footnote be revised to clarify this regulatory requirement.

RESPONSE DPH NO. 2: Water Board staff has clarified the statement made in A.10 and the related footnote No. 2 by replacing the word, “7605” with “7604(c)(2)” in Prohibition A.10 and modifying footnote No. 2 to read as follows, “² This requirement does not apply to premises as defined by CCR Title 17, Table 1 Sections 7604(c)(1) and (c)(3).”

MRR B GENERAL COMMENT NO. 1: The Department finds that the Zenon Zeeweed 500d ultrafiltration technology is an acceptable filtration technology to produce tertiary effluent for the intended beneficial uses. The Department recommends that Section B, Specifications, Flow and General Limitations, be revised to specify that the proposed recycled water treatment train is considered equivalent to tertiary treatment, per Title 22 requirements, when the Zenon

¹ DPH comments with a strikethrough indicate a change in comments based on an email sent to Water Board staff by Van Tsang, DPH Engineer, on October 20, 2008.

Zeeweed 500d membranes are used in accordance with the manufacturer's specifications and the DWTP's Operations Plan.

RESPONSE DPH NO. 3: Water Board staff has added section B.11 to the MRR. Section B.11 states the following:

Operations and Maintenance

11. The tertiary treatment system will be used in accordance with the manufacturer's specifications and operated as described in the Discharger's Operations and Maintenance manual for the Zenon Zeeweed 500d system.

MRR SECTION B GENERAL COMMENT NO. 2: Also, the Department recommends that the MRR specify that when the plant capacity is increased to 5.0 MGD that only the Zenon Zeeweed 500d membranes be installed and used.

RESPONSE DPH NO. 4: Water Board staff clarified section A.1 to meet this request. Sentence No. 2 of section A.1 states the following, "Upon purchase and installation of additional Zenon Zeeweed 500d system membrane units and ..."

MRR SECTION B GENERAL COMMENT NO. 3: To clarify an operational issue, by letter dated July 3, 2008, to the Board, the Department noted that the Zenon ultrafiltration process should contain equipment that is capable of conducting air pressure hold tests on the membrane modules to confirm the integrity of the membrane barrier should a single fiber be broken. After further review of the treatment technology, the Department has determined that the membrane integrity test should not be a requirement for the Zenon Zeeweed 500d ultrafiltration technology and that complying with turbidity performance standards are sufficient to determine filtration effectiveness.

RESPONSE DPH NO. 5: Water Board staff acknowledges DPH's determination for no membrane integrity testing by the Discharger due to turbidity performance standards. Hollister's proposed MRR does not indicate the details of this requirement per your July 3, 2008, letter therefore, no modifications to the MRR are necessary.

MRR B.8 COMMENT: Item 8 states that, "The turbidity of the disinfected tertiary recycled water shall not exceed any of the following:

- a. An average of 0.2 nephelometric turbidity units (NTU) within a 24-hour period;
- b. 0.2 NTU more than 5 percent of the time within a 24-hour period; and
- c. 0.5 NTU at any time."

The Department recommends that this be revised to be consistent with Section 60301.320 (b), CCR. Only Items 8(b and c) are found in regulation. Item 8(a) should be deleted. In addition, turbidity is measured immediately after the

filtration process. So, Item 8 should be revised to, "The filtered wastewater shall not exceed..."

RESPONSE DPH NO. 6: Specification Requirement 8.a states, "The turbidity of the disinfected tertiary recycled water shall not exceed any of the following: a. An average of 0.2 nephelometric turbidity units (NTU) within a 24-hour period;" Pursuant to CCR Title 22, Div. 4, Chap. 3, Section 60301.320(b), this is not a requirement of an ultrafiltration unit. Water Board staff has removed Specification Requirement 8.a and replaced the wording "disinfected tertiary recycled water" with "filtered wastewater." Items 8.b and 8.c are now numbered 8.a and 8.b, respectively.

MRR B.8 COMMENT: The DWTP will utilize a Zenon Zeeweed 500d ultrafiltration technology and chlorination disinfection to achieve turbidity and bacteriological standards for disinfected tertiary recycled water. Coagulation is not provided and is not required as part of the treatment process. The Department recommends deleting footnote (4) because the coagulation requirements do not apply to treatment at the DWTP.

RESPONSE DPH NO. 7: Water Board staff modified footnote No. 4 of the MRR to fulfill comment *MRR B.8 and B.9 COMMENT* below.

MRR B.9(c) COMMENT: Item 9(c) specifies that the total coliform concentrations for disinfected tertiary recycled water must be less than an MPN of 240 per 100 mL at all times. To be consistent with regulations (Section 60301.230(b), CCR), the Department recommends that this item be revised to state; "No sample shall exceed an MPN of 240 total coliform bacteria per 100 milliliters."

RESPONSE DPH NO. 8: Water Board staff has modified item B.9(c) to be consistent with Section 60301.230(b) of the California Code of Regulations (CCR).

MRR B.8 and B.9 COMMENT: The Department recommends that a new item be added to clarify the compliance monitoring requirements for Items 8 (turbidity) and 9 (coliform) as required in Section 60321, Title 22, CCR. The following is suggested:

"Disinfected tertiary recycled water must be sampled at least once daily for total coliform bacteria. The samples must be taken from the disinfected effluent and must be analyzed by an approved laboratory. Further, the water must be continuously sampled for turbidity using a continuous turbidity meter and recorder following filtration. Compliance with the daily average operating filter effluent turbidity must be determined by averaging the levels of recorded turbidity taken at four-hour intervals over a 24-hour period. Compliance with turbidity pursuant to Section 60301.320 (b)(1), CCR [or new Disinfected Tertiary Recycled Water Limitations, Item 8(a)] must be determined using the levels of recorded

turbidity taken at intervals of no more than 1.2-hours over a 24-hour period. Should the continuous turbidity meter and recorder fail, grab sampling at minimum frequency of 1.2-hours may be substituted for a period of up to 24-hours. The results of the daily average turbidity determinations must be reported quarterly to the Board."

RESPONSE DPH NO. 9: Monitoring and Reporting Program (MRP) No. R3-2008-0069 requires the Discharger to sample total coliform on a daily basis, that the analyses be performed at a DPH certified laboratory, and that the Discharger report on a quarterly basis. Water Board staff has added note 'a' to Total Coliform and note 'm' to Turbidity in the Effluent Monitoring table of the MRP. Note 'a' requires Total Coliform sampling to occur immediately following the final treatment process (i.e., disinfection or dechlorination as applicable) unless noted otherwise. Note 'm' requires Turbidity to be continuously sampled using a turbidity meter and recorder following filtration. Footnote 4 in B.8 states, *'Compliance with the daily average operating filter effluent turbidity must be determined by averaging the levels of recorded turbidity taken at four-hour intervals over a 24-hour period. Compliance with turbidity pursuant to Section 60301.320 (b)(1), CCR must be determined using the levels of recorded turbidity taken at intervals of no more than 1.2-hours over a 24-hour period. Should the continuous turbidity meter and recorder fail, grab sampling at minimum frequency of 1.2-hours may be substituted for a period of up to 24-hours'* as per your request stated above.

MRR B.10 COMMENT: Section 2.5.3.1 of the Engineers Report proposed that the filtered effluent will be equally split between the two chlorine contact basins. In other words, the two chlorine contact basins will be operated in a parallel formation, not in series. ~~In a July 22, 2008 email from Mr. Stephen Ferry of HydroScience Engineers, Inc. (the City's engineering consultant) to the Department, it was proposed that the two chlorine contact basins will be operated in series, instead of parallel, to maximize chlorine contact time and minimize chlorine usage.~~ The Department recommends that this treatment configuration be specified in the MRR and chlorine contact basins operated at all times to meet the performance requirement established in Item 10.

In addition, to clarify the compliance monitoring frequency for Item 10, the Department recommends the following be added to Item 10: "Compliance with CT requirements should be determined at least daily."

RESPONSE DPH NO. 10: Water Board staff added the following text to B.10, "The two chlorine contact basins will be operated in parallel at all times" and added the words, "in each contact basin" at the end of the last sentence in B.10. Note'd' of the Effluent Monitoring table of the MRP requires Total Chlorine Residual measured to be compared to the chlorine residual required to achieve a minimum CT value of 450 milligrams-minutes per liter. The MRP requires

continuous Total Chlorine Residual monitoring. Water Board staff added the word, 'daily' to Note 'd' of the Effluent Monitoring table of the MRP.

MRR C.1 COMMENT: Item 1 specifies that the City must submit to, and obtain approval from, the Department and the Board the plan for the recycled water distribution system from the DWTP to the use areas prior to initial delivery of recycled water. The plan should show the final and as-built drawings and maps of the locations of the potable water, sewer, and recycled water pipelines. The Department recommends that this requirement be revised to indicate that the proposed plans must be submitted to, and approved by, the Department and Board prior to construction. And, after construction, as-built drawings must be prepared and kept on file by the City.

RESPONSE DPH NO. 11: Water Board staff added the words 'construction and' to the first sentence of item C.1 following the words 'prior to.' An additional sentence to item C.1 states, "The Discharger must prepare as-built drawings and keep them on file once construction is completed."

MRR C.1 COMMENT: Also, Item 1 specifies that the design drawings "...should indicate adequate separation between the recycled water and potable domestic water lines..." The Department recommends that this be revised to include the regulatory requirements for pipe separation specified in the California Waterworks Standards (CWS). Section 64572(c and d), CWS requires that the potable pipeline be four feet horizontally from, and one foot vertically above, any parallel pipeline conveying disinfected tertiary recycled water. If crossing a pipeline conveying disinfected recycled water, a potable water main must be constructed no less than 45-degrees to and at least one foot above that pipeline.

RESPONSE DPH NO. 12: Water Board staff added the words, "as required by California Waterworks Standards sections 64572(c) and (d)" in the third sentence of item C.1.

MRR C.3 COMMENT: Item 3 referenced the Department's *Guidelines for Use of Reclaimed Wastewater for Irrigation and Impoundment* and *Guidelines for Worker Protection at Reclamation Use Areas*. These guides were developed before the adoption of the current Title 22 requirements and, as such, are no longer enforced. The Department recommends that these two documents be deleted from this Item.

RESPONSE DPH NO. 13: Water Board staff deleted the two references that are no longer enforced from item C.3.

MRR C.6 COMMENT: Item 6 states that, "Delivery of recycled water shall cease during any period the DWTP fails to produce disinfected tertiary recycled water meeting CCR Title 22 criteria." The Department recommends that the criteria for diversion of recycled water should be more specifically established. Our

recommendation is, "...meeting performance criteria specified in Permit Specifications Items 8, 9, and 10."

RESPONSE DPH NO. 14: Water Board staff has modified the first sentence of item C6 so that it states, "Delivery of recycled water shall cease during any period the DWTP fails to produce "disinfected tertiary recycled water" meeting performance criteria specified in sections B.8, B.9, and B.10 of this Order."

MRR C.7 COMMENT: Item 7 states that, "All recycled effluent storage reservoirs and use areas with public access shall post (in English and Spanish) signage to warn the public recycled wastewater is being stored or used." Title 22 defines "landscape impoundment," "restricted recreational impoundment," and "nonrestricted recreational impoundment." For clarity and to be consistent with regulatory definitions, the Department recommends that the term "storage reservoirs" be revised to "impoundments." Also, the Department recommends that "with public access" be deleted. Even restricted access use sites should be properly marked for worker protection.

RESPONSE DPH NO. 15: Water Board staff replaced the words "storage reservoirs" with the word "impoundments" and deleted the words, "with public access" from item C.7.

MRR C.8 COMMENT: Item 8 notes that, "Recycled water systems shall be properly labeled and regularly inspected to ensure proper operation, absence of leaks, and absence of illegal connections." For clarity, the Department recommends that "Recycled water systems" be changed to "Recycled water use areas."

RESPONSE DPH NO. 16: Water Board staff replaced the word 'systems' with 'use areas' in item C.8.

MRR D.1 COMMENT: Item 1 states that, "The application of disinfected tertiary recycled water is limited to the following areas pursuant to Title 22, Division 4, Chapter 3, Section 60304 of the California Code of Regulations:

- a) Food crops, including all edible root crops, where the recycled water comes into contact with the edible portion of the crop,
- b) Parks and playgrounds,
- c) School yards,
- d) Residential landscaping,
- e) Unrestricted access golf courses, and
- f) Any other irrigation use not specified in Section 60304 (Title 22) and not prohibited by other sections of the California Code of Regulations, or within these requirements."

Title 22 has established other safe uses of disinfected tertiary recycled water. The Department recommends that Item 1 is revised to:

"The application of disinfected tertiary recycled water is limited to the following areas pursuant to Title 22, Division 4, Chapter 3, of the California Code of Regulations:

Surface irrigation:

- a) Food crops, including all edible root crops, where the recycled water comes into contact with the edible portion of the crop,
- b) Parks and playgrounds,
- c) School yards,
- d) Residential landscaping,
- e) Unrestricted access golf courses,
- f) Cemeteries,
- g) Freeway landscaping
- h) Ornamental nursery stock, Christmas tree farms and sod farms,
- i) Fodder, fiber and pasture for animals producing milk for human consumption,
- j) Orchards and vineyards, and
- k) Seed crops not eaten by humans.

Other uses:

- a) Impoundments,
- b) Industrial or commercial cooling or air conditioning that involves the use of a cooling tower, evaporative condenser, spraying or any mechanism that may create a mist,
- c) Industrial boiler feed,
- d) Flushing toilets and urinals,
- e) Priming drain traps,
- f) Industrial process water,
- g) Structural and nonstructural fire fighting,
- h) Mixing concrete,
- i) Decorative fountains,
- j) Commercial laundries,
- k) Construction water for backfill consolidation, soil compaction, mixing concrete and dust control at construction sites,
- l) Commercial car washes, including hand washes if the recycled water is not heated, where the general public is excluded from the washing process, and
- m) Cleaning roads, sidewalks and outdoor work areas."

RESPONSE DPH NO. 17: Water Board staff modified section D.1 to include other uses of disinfected tertiary recycled water as noted above.

MRR D.2 COMMENT: The Department recommends that Item 2 be revised to: "The Supplier and Distributor shall not add additional use areas or users other than those specified in User Requirements, Item 1 unless the proposed use is submitted to, and approved by, the Department and Board."

RESPONSE DPH NO. 18: Water Board staff revised item D.2 as suggested by DPH.

MRR D.12 COMMENT: Item 12 references CCR Title 18, Section 7605, in establishing testing of backflow prevention devices. The Department recommends that this reference be revised to Title 17.

RESPONSE DPH NO. 19: Water Board staff replaced reference to CCR Title 18 with CCR Title 17 in order to reference the correct regulation for testing and maintenance of backflow preventers.

MRR SECTION D GENERAL COMMENT NO. 1: The Department recommends that a new Item, or Section, be added that addresses the requirements for a dual-plumbed use site. The Department suggests that the following be added to the MRR:

"Requirements for Dual-Plumbed Recycled Water System

1. The potable water supply shall not be used as a backup or supplemental source of water for a dual-plumbed recycled water system unless the connection between the two systems is protected by an air gap separation which complies with the requirements of Section 7602 (a) and 7603 (a) of Title 17, California Code of Regulations, and that such connection has been approved by CDPH.
2. The Distributor shall not deliver recycled water to a facility using a dual-plumbed system unless the report required pursuant to Section 13522.5 of the California Water Code, and which meets the requirements set forth in requirement 3, below, of this Order, has been submitted and approved by CDPH. The Regional Board shall be furnished with a copy of the CDPH approval together with the aforementioned report within 30 days following the approval.
3. The report pursuant to Section 13522.5 of the California Water Code shall contain the following information for dual-plumbed systems, in addition to the information required by Section 60323 of Title 22, California Code of Regulations (Engineering Report):
 - a. A detailed description of the intended use site identifying the following:

- i. The number, location, and type of facilities within the use area proposing to use dual-plumbed systems;
 - ii. The average number of persons estimated to be served by each facility on a daily basis;
 - iii. The specific boundaries of the proposed use site including a map showing the location of each facility to be served;
 - iv. The person or persons responsible for operation of the dual-plumbed system at each facility; and
 - v. The specific use to be made of the recycled water at each facility.
 - b. Plans and specifications describing the following:
 - i. Proposed piping system to be used;
 - ii. Pipe locations of both the recycled and potable systems;
 - iii. Type and location of the outlets and plumbing fixtures that will be accessible to the public; and
 - iv. The methods and devices to be used to prevent backflow of recycled water into the public water system.
 - c. The methods to be used by the Producer to assure that the installation and operation of the dual-plumbed system will not result in cross connections between the recycled water piping system and the potable water piping system. These shall include a description of pressure, dye or other test methods to be used to test the system every four years.
4. Prior to the initial operation of the dual-plumbed recycled water system and annually thereafter, the dual-plumbed system within each facility and use site shall be inspected for possible cross connections with the potable water system. The recycled water system shall also be tested for possible cross connections at least once every four years. The testing shall be conducted in accordance with the method described in requirement 3(c), above, of this Order. The inspections and the testing shall be performed by a cross connection control specialist certified by the California-Nevada section of the American Water Works Association or an organization with equivalent certification requirements. A written report documenting the result of the inspection and testing for the prior year shall be submitted to CDPH within 30 days following completion of the inspection or testing.
5. The Producer shall notify CDPH of any incidence of backflow from the dual-plumbed recycled water system into the potable water system within 24 hours of discovery of the incident."

RESPONSE DPH NO. 20: Water Board staff created sections D.35 through D.39 in the MRR and inserted the suggested text presented above by DPH for dual plumbed recycled water systems.

MRR D.15 COMMENT: The footnote (22) for Item 15 referenced an August 2005, RMC, Engineering Report for Production, Distribution, and use of Recycled Water, Appendix E-Las Palmas Ranch Cross Connection Control Plan. The Department is uncertain how this reference document applies to or relates to the Cross Connection Control Program for the City of Hollister. The Department believes this may be a transcription error. If the City of Hollister is adopting the Las Palmas Ranch Cross Connection Control Plan, a copy of the Plan should be submitted to the Department for review and approval.

RESPONSE DPH NO. 21: Water Board staff modified footnote no. 22 to reference the correct cross connection rules of service and certification submitted within Appendix A and B of the April 2008, RMC, Engineers Report for Production, Distribution, and use of Recycled Water.

MRR D.33 COMMENT: Item 33 states that Recycled Water Use permits shall require Users to have these (copy of the Recycled Water Use Permit and the Order) "...available at all times for inspection by Water Board staff, the Distributor, or State/County Health Officers." The Department recommends that the last sentence be revised to "...for inspection by Water Board staff, the Distributor, County Health Officer or CDPH."

RESPONSE DPH NO. 22: Water Board staff revised wording in item D.33 as suggested by DPH in MRR D.33 COMMENT.

MRR E.3 COMMENT: Item 3 requires the City to conduct a tracer study under four different flow rates to determine the respective modal contact times for the chlorine contact basins when they are operated simultaneously in parallel. ~~As mentioned above, under Disinfected Tertiary Recycled Water Limitations, the engineering consultant clarified that the two chlorine contact basins will be operated in series instead of parallel to maximize chlorine contact time and minimize chlorine usage.~~ Therefore, the tracer study must be conducted while the two chlorine contact basins are operated in series parallel. A final report on the tracer study should be submitted to the Department and Board for review and approval prior to start up.

RESPONSE DPH NO. 23: Water Board staff agrees with the required tracer studies to be performed in parallel due to that is how the treatment system will operate on a daily basis. The Discharger must perform the tracer studies as indicated in item E.3 and submit a final tracer study report to the Water Board and DPH prior start-up.

MRR SECTION E GENERAL COMMENT NO. 1: The Department recommends that an additional provision be added to require an operations plan for the DWTP be submitted to the Board and Department for review and approval prior to start up.

RESPONSE DPH NO. 24: Water Board staff agrees that an Operations and Maintenance manual for the new DWTP is required for successful operation of the reclaimed water system. Water Board staff inserted the requirement for an Operations and Maintenance (O&M) manual into Provision E. 7 which requires approval by the Water Board and DPH prior to system start-up.

MRR SECTION E GENERAL COMMENT NO. 2: Also, the April 2008 Engineers Report noted that the DWTP has a SCADA system that enables full monitoring and control of the plant. The SCADA system, which has battery power back-up, will provide the annunciation of the alarms, that is, the alarms will sound for the following events:

- The loss of normal power
- Failure of biological treatment process
- Failure of disinfection process
- Failure of a filtration process

The Department recommends that a list of process control alarm set points should be included within the Operations Plan.

RESPONSE DPH NO. 25: Provision E.7 of the MRR requires a list of process control alarm set points be stated in the O&M manual.

MRR SECTION E GENERAL COMMENT NO. 3: The Plan should also include the procedures, frequencies and the agency and/or contractor responsible for testing the alarms for proper operation. If automatic shutdown features are provided to the treatment process, the shutdown features must also be tested. A detailed discussion of the follow up actions required, if the alarms were to sound, need to be included within the plan.

RESPONSE DPH NO. 26: Provision E.7 of the MRR requires procedures, frequencies and the agency and/or contractor responsible for testing proper operation of the alarm set points and shutdown features. It is requires the O&M manual to describe in detail actions required if alarms are to sound or shutdown features are activated.

MRR SECTION E GENERAL COMMENT NO. 4: Furthermore, a discussion regarding compliance determination should be incorporated into the Operations Plan.

RESPONSE DPH NO. 27: Provision E.7 of the MRR requires a discussion regarding compliance determination with the MRR in the O&M manual.

MRR SECTION E GENERAL COMMENT NO. 5: Finally, Section 2.8 of the April 2008 Engineers Report noted that turbidity meters and chlorine analyzers are

checked daily and calibrated as needed. The online analyzers should be checked and calibrated in accordance with the manufacturer's specifications. Checks and calibration procedures need to be included within the Operations Plan.

RESPONSE DPH NO. 28: Provision E.7 of the MRR requires a list of required checks and calibration procedures for the turbidity meters and chlorine analyzers in the O&M manual.

MRR SECTION E GENERAL COMMENT NO. 6: The Department recommends an additional provision to ensure that the City's potable water supply is properly protected from recycled water use sites' cross connections by performing a site test by a qualified individual. The Department recommends the following: "Prior to use of the recycled water supply on site, the City should ensure that the use area is inspected and tested for possible cross connections with the potable water system. The inspections and testing should be performed by a cross connection control specialist certified by the California-Nevada section of the American Water Works Association or an organization with equivalent certification requirements. A written report documenting the result of the inspection or testing for the prior year should be submitted to the Department and Board within 30 days following completion of the inspection or testing."

RESPONSE DPH NO. 29: Water Board staff agrees with the recommendation to have cross connection tested prior to distribution of recycled water by a certified specialist. The MRR requires this of the Supplier and Distributor in a new item C.41.

City of Hollister (COH) COMMENTS

COMMENT – STAFF REPORT (SR) PAGE 1: The Key Information section should identify the 1.5 mgd of current disposal capacity as disinfected treated wastewater to seasonal storage, not non-disinfected.

RESPONSE COH No. 1: Water Board staff replaced the word 'non-disinfected' with the word 'disinfected' in row 7 entitled *Current Disposal Capacity* of the Key Information section.

COMMENT - SR PAGE 2: The Summary section should identify the date of completion for the DWTP project as October 23, which is the date of the plant dedication.

RESPONSE COH No. 2: The domestic wastewater treatment plant's successful completion date has been changed to October 23, 2008, in the Summary section.

COMMENT - SR PAGE 2: The Discussion section includes the statement that the DWTP has not had enough capacity to treat the water. Actually, the problem has been the lack of adequate disposal.

RESPONSE COH No. 3: Water Board staff modified the first sentence of the Discussion section to read as follows, "In the past eight years, the DWTP has had a lack of disposal capacity to dispose of all the City of Hollister's wastewater."

COMMENT - SR PAGE 3: The Discussion section should include two additional improvements in the list of new facilities at the DWTP: the new seasonal storage ponds, and the return water pumping station.

RESPONSE COH No. 4: Water Board staff added the two new facilities stated above into the new facilities list presented on page 3 of the Staff Report and on page 2 of the MRR.

COMMENT - SR PAGE 10: Supplier Requirements should indicate average dry weather flow wastewater flows will increase from 2.69 to 4.9 mgd.

RESPONSE COH No. 5: Water Board staff added the following text under Supplier Requirements – Wastewater Flows, "...with a future potential increase of wastewater flow to 5.0 MGD capacity after installation of fifth Zenon Zeeweed 500d system ultrafiltration membrane."

COMMENT MRR GENERAL: Master Reclamation Requirements Order *please note page numbering of our copy of the MRRs starts with page 7*

RESPONSE COH No. 6: Water Board staff recognizes the document's formatting error and adjusted the document's page number to coincide with the number of pages.

COMMENT MRR FACILITY INFORMATION FINDING NO. 4: Same comment as Staff Report page 3 above, should include two additional improvements in the list of new facilities at the DWTP: the new seasonal storage ponds, and the return water pumping station.

RESPONSE COH No. 7: Staff modified the proposed Order as requested.

COMMENT MRR A.8: seems to conflict with Prohibition A-13 and Specification B-4 in that the latter two clearly allow discharge of disinfected, tertiary treated wastewater to disposal at the IWTP perc ponds, while Prohibition A-8 could be read as disallowing that practice. Prohibition A-8 refers to "recycled water" and the other two cited sections of the draft Permit refer to "disinfected tertiary treated wastewater", but in practice, there is no difference between the two for this project. The City should have the management option to send treated disinfected water from seasonal storage to disposal, if there exists no ready user for that water, and operational conditions require that storage.

RESPONSE COH No. 8: Water Board staff agrees that the term "recycled water" is synonymous with the term "disinfected tertiary treated wastewater." It is understood that at times when recycled water is not needed or can not be used by Users then it may have to be disposed of into a percolation pond; therefore, Water Board staff modified Prohibition A.8 to allow the discharge of recycled water at the DWTP and the industrial wastewater treatment plant percolation ponds.

COMMENT MRR B.2: specifies monthly average of daily discharge quantities to the DWTP perc ponds be limited to 2.38 mgd. Once constructed and operating, the Brigantino Riverside Park and Hollister Airport reclaimed water irrigation projects are estimated to ultimately use over 0.60 mgd of recycled water. However, irrigation water demand variations at these sites since they are weather-dependent natural systems. Therefore, the limitation of flow to the perc ponds should be 2.60 mgd to account for irrigation demand variations. Limiting the on-site disposal to 2.60 mgd will ensure that all flow, over and above the existing baseline, will be used off-site as recycled water in accordance with the MOU between the City and the San Benito County Water District. In addition, stating the limit in terms of a monthly average (of daily discharge quantities) will not accommodate the seasonal variation in water management options that this facility will need to address. The specification should state the limitation in terms of an annual average (of daily discharge quantities).

RESPONSE COH No. 9: Percolation bed disposal capacities are discussed at length in Sections 4.3 and 4.10 of the COH's Report of Waste Discharge (ROWD) application. Section 4.3 presents Geocon's 2004 extensive data (10-month study) on percolation capacity at the DWTP and the data indicate the total combined percolation capacity of the DWTP to be at least 2.38 MGD. Other less comprehensive DWTP disposal capacity studies presented in the 1999 Environmental Impact Report, 2002 desktop analysis by Ken Schmidt, and by Geomatrix in 2006 indicate disposal capacities at 2.5 MGD, 3.5 to 4.0 MGD, and ~2.5 MGD, respectively. Geocon data indicate annual average percolation rates recorded from 2000 through 2004 range from 1.74 MGD to 2.07 MGD. Also, Geocon 2000 through 2004 monthly average data indicates percolation rates range from 1.33 MGD to 2.63 MGD (in August). Section 4.3.1 of the ROWD indicates that the total disposal area on the west side of Highway 156 will increase by 15% after construction of the new seasonal storage ponds. Therefore, based on Geocon's data and an increase of 15% of disposal area, Water Board staff modified the monthly average of treated wastewater flow from 2.38 MGD to 2.60 MGD with a reduction in total wastewater flow to the percolation basins as seasonal storage areas become lined. Section B.2 now reads as follows:

2. "Daily flow of treated wastewater to the DWTP percolation basins averaged over each month shall not exceed 2.60 MGD calculated on an annual average basis. ^{ROWD, BPJ} Percolation volume reduction will occur as each percolation

basin is lined. The Discharger will submit a percolation technical memorandum prior to the lining of each percolation basin indicating the volume of percolation which will be eliminated. The daily flow of treated wastewater to the DWTP percolation basins averaged over each month will be reduced as indicated in the percolation technical memorandum and as approved by the Executive Officer.”

The modification made to Section B.2 is reflected in the Key Information box of the Staff Report.

COMMENT MRR B.5, TABLES 2: Both tables (interim and final) indicate effluent limitations for total suspended solids of 0.2 mg/L and 0.1 mg/L as the daily max and annual average respectively. These are typical limits for total settleable solids (although the units for total settleable solids would be ml/L); typical limits for total suspended solids are an order of magnitude higher. The permit should be edited to either change the parameter or change the numeric limits.

RESPONSE COH No. 10: The total suspended solids effluent limitations set in Tables 2 and 3 are a typographical error made by Water Board staff. The total suspended solids effluent limit has been corrected to be 20 mg/L daily maximum and 10 mg/L annual average for both tables.

COMMENT MRR B.5, TABLE 2: It does not appear that the interim effluent limitations for chloride and boron can be met by the existing facility. Recent operating data, proposed limits, and the effluent quality projection from the RWD, for chloride, sulfate, TDS, sodium and boron, are compared in **Table 1** below.

PARAMETER	EXPECTED ANNUAL AVERAGE (from March 2007 RWD Table 3-15)	DRAFT INTERIM EFFLUENT LIMITATION	JULY 2008 AVERAGE	AUGUST 2008 AVERAGE	JULY 2008 MAXIMUM	AUGUST 2008 MAXIMUM
Total dissolved solids [mg/L] ²	1,190	1,200	1,175	1,033	1,237	1,100
Chloride [mg/L] ¹	272	240	269	269	292	280
Sulfate [mg/L] ¹	207	250	~	~	~	~
Sodium [mg/L] ¹	242	250	225	221	240	228
Boron ²	0.7	1.0				

¹ DWTP Operating records, 2006

² City of Hollister, 2006, cited in EIR, AES, 2006.

In general, the salt effluent limitations should be enforced as annual averages, not as monthly averages. The projected effluent quality for the first phase of MBR operation was stated in the RWD in Table 3-15 as annual averages. Enforcing an annual average on a monthly basis is overly restrictive, and does not allow for variance between months. For example, consider Hollister DWTP in 2006. The May 2006 monthly grab sample was measured at 262 mg/L effluent sulfate. The average for all 12 months was 207 mg/L. The interim limit of 250 mg/L, if enforced as a monthly standard, would have resulted in a violation in May 2006. If enforced as an annual average, the discharge would have been considered compliant. Specific to chloride, the interim limit for chloride has been set below the expected effluent chloride stated in RWD Table 3-15. The RWD stated expected annual average effluent chloride of 272 mg/L. Rounded up to two significant figures, the expected annual average effluent chloride would be 280 mg/L. The limit for effluent chloride should be raised from 240 mg/L to 280 mg/L, and enforced as an annual average. Specific to boron, the characterization in Table 3-15 was based on the EIR for the project. Data supplied by the WWTP Operating staff are shown for boron in **Table 2** below.

MONTH	2005	2006	2007	2008
January	1.1			
April	2.2	0.9	1.2	0.9
July		1.3	1.1	
October			1.1	
December	1.1			
Average, all samples	1.2			

Recent sampling data indicate the average effluent boron is 1.2 mg/L. The interim and final effluent limitations for boron should be raised to 1.5 mg/L. If interim limits for effluent boron and chloride can not be increased, then a time schedule for compliance should be considered.

RESPONSE COH No. 11: As stated in the Staff Report, the DWTP is located within the Pajaro River (a.k.a. Gilroy-Hollister Valley) groundwater basin. The Water Quality Control Plan (Basin Plan) specifies specific median water quality objectives for the Hollister sub-basin to the Pajaro River groundwater basin, which is where the DWTP percolates its treated wastewater. These median water quality objectives are restated below.

**Median Groundwater Objectives for the Pajaro River Groundwater Sub-basin/
Hollister Sub-area**

Parameter	Concentration (mg/L)
Total Dissolved Solids (TDS)	1200
Chloride (CL)	150
Sulfate	250
Boron	1.0
Sodium	200
Total Nitrogen (as N)	5

The DWTP's effluent characteristics can not have constituent concentrations that have the potential to impact beneficial uses of the Hollister groundwater sub-area as indicated in the Basin Plan for sodium, chloride, and boron. Water Board staff is informed of the COH project to treat their water supply so that in the near future high levels of sodium and chloride will be reduced to Basin Plan groundwater objectives. Therefore, Table No. 2 is renamed to "Interim Effluent Limitations Through January 2015" and has an effluent limit for sodium of 250 mg/L and chloride of 280 mg/L as an annual average. In response to the comment, Water Board staff has moved the effluent limits stated in the Monthly Average column to the Annual Average column for all the constituents previously listed under the Monthly Average column.

The Discharger provided extensive water supply data extracted from the groundwater basin in Hollister on November 10, 2008. This data indicates boron is a naturally occurring mineral and a limit less than 1.5 mg/L is not possible to acquire without additional treatment of the effluent. Water Board staff reviewed the background boron data and does not think it feasible to require the Discharger to treat its boron effluent to levels less than what is naturally occurring in the aquifer. Effluent limits for boron are set for an annual average of 1.5 mg/L in Tables 2 and 3 of the MRR,

COMMENT MRR B.6, TABLE 2: sets enforceable limits for a date outside the period to be covered by this Permit. This information should be included as a finding, if at all.

RESPONSE COH No. 12: Water Board staff has changed the table number in B.6 from Table 2 to Table 3. MRRs do not expire; therefore, the limits stated in Table 3 are enforceable through 2015. In order to be consistent with Table 2 modifications described above, all effluent limits have been changed from monthly averages to annual averages.

COMMENT MRR B.8: Specifies turbidity after disinfection. Because turbidity at the start of the disinfection process is the key parameter, and because chlorination itself can increase turbidity, the proper place to measure continuous turbidity is after the membrane basins and ahead of the chlorine contact basins. The turbidity meters at the new DWTP are on the individual membrane trains,

ahead of disinfection. Specification B-8 should specify turbidity of the filtered wastewater, not turbidity of the disinfected wastewater.

RESPONSE COH No. 13: See RESPONSE DPH NO. 6.

COMMENT MRR B.8: includes three turbidity standards. According to 22CCR60301.32, the first standard cited (average turbidity must be <0.2 NTU for any 24-hour period) is applicable only to media filtered water, and should be struck from the Permit. The second two standards in the draft Permit (0.2 NTU < 5% of any 24-hour period, and <0.5 NTU always) are applicable to membrane filtered water.

RESPONSE COH No. 14: See RESPONSE DPH NO. 6.

COMMENT MRR B.10: As evidence of compliance with the disinfection process standards (CT greater than or equal to 450 mg-min/L, and MCT of 90 minutes or more), the City proposes to submit SCADA-calculated CT trends. The SCADA system at the DWTP can provide and record real-time calculations of CT and HRT on a continuous basis. From the trend, compliance or non-compliance with the process standards will be immediately apparent. The proposed protocol would be more accurate and considerably more reliable than a series of manual calculations over time.

RESPONSE COH No. 15: The SCADA-calculated continuous CT trends is an acceptable format to meet the disinfected tertiary recycled water limitations stated in item B.10 and shall be submitted with the Discharger's quarterly self monitoring report.

COMMENT MRR C.16: requires alarms to be sent to "...a police station, fire station or other full-time service unit with which arrangements have been made to alert the person in charge at times that the reclamation plant is unattended." Steve Ferry of HSe clarified with Van Tsang of DPH that a SCADA system with an autodialer that notifies the operation staff of any alarm conditions that exists 24 hours per day meets the intent of the reliability criteria of Section 60335 (d). This clarification should be added to the Permit language.

RESPONSE COH No. 16: Water Board staff has made the requested modifications to item C.16.

COMMENT MRR C.25: requires monthly summary of operating records to be filed monthly. Performance reports are set for quarterly reporting. Shouldn't this be quarterly also?

RESPONSE COH No. 17: Water Board staff agrees that the operating record summary shall be submitted as required by MRP No. R3-2008-0069 and has modified item C.25 to agree with the MRP requirements.

COMMENT MRR C.39: requires that "all storm water contacting raw domestic wastewater or disinfected tertiary recycled water shall be contained and managed as raw domestic wastewater." If this comment is intended to apply only to the DWTP Operations area surrounding the MBRs, then the Requirement should be re-worded to clearly indicate that fact. However, if this Requirement is intended to apply to the areas including the seasonal storage ponds or use areas, then the following considerations must be addressed. Rain water falling into the seasonal storage ponds when they are filled with disinfected tertiary (recycled) water could be interpreted as requiring re-treatment under this requirement. In addition, if for some reason an incident resulting in contact between rain water and compliant recycled water occurred within a use area, then the re-application of the resulting mixture back onto the use area should be allowed as a management option. In summary, including raw wastewater in this requirement is acceptable for all sites, however, including disinfected tertiary recycled water in this requirement is problematic if the requirement applies to the seasonal storage ponds, use areas, or any area beyond the DWTP MBR operations area.

RESPONSE COH No. 18: Water Board staff agrees that item C.39 needs to be restated so that falling rainwater into storage ponds and use areas are not affected by this requirement. Water Board staff reworded item C.39 by inserting the word 'runoff' after the words 'storm water' and by adding the words 'at the DWTP' after the words 'tertiary recycled water.'

COMMENT MRR C.40: requires that the Supplier send weekly reports to Users containing Information which is reported to the Regional Board quarterly. Generating and distributing weekly reports to Users would be a large demand of time, and the utility of the frequent reports is not clear. In the MRP, Distributor Requirement G-6 requires that "Each individual User Reclaimed Water Site Supervisor shall provide quarterly updates to the Distributor regarding irrigation frequency and flow rates, proposed system modifications..." The frequency of Supplier reports to Users should match the frequency of User reports to the Distributor, namely, quarterly. Changing MRR C-40 report frequency to quarterly would be consistent and reasonable.

RESPONSE COH No. 19: Water Board staff agrees with Comment MRR C.40. The Supplier reporting to the User has been changed from weekly to quarterly.

COMMENT MRR D.2: provides that "the Supplier and Distributor may add additional use areas/Users for the application of disinfected tertiary treated wastewater as long as they meet all applicable requirements contained within this Order and the California Code of Regulations." User Requirement D-2 should clarify that additional use areas can be added upon Executive Officer approval (without full Board action) after fulfillment of the stated conditions.

RESPONSE COH No. 20: Allowing the discharge of disinfected tertiary treated wastewater in a matter not listed in item D.1 is only acceptable once approved by the DPH and the Water Board. Although, a Regional Board action is not required for the approval of a new use and is acceptable if approved by the Water Board's Executive Officer. Therefore, the words 'Water Board' have been replaced by the words 'Executive Officer' in item D.2.

COMMENT MRR D.14: requires that "All pipes installed above or below the ground, on and after June 1, 1993, that are designed to carry recycled water, shall be colored purple or distinctively wrapped with purple tape." There currently exists some limited piping on the DWTP premises which was installed after 1993, has been incorporated into the recycled water system, and is not purple. The existence of this underground, converted piping must be allowed under the new Permit. All above-ground pipes, valves and appurtenances for recycled water at the DWTP have been appropriately marked or colored, regardless of age. All future pipes, valves and appurtenances for recycled water will be appropriately marked or colored, be they above ground or below ground.

RESPONSE COH No. 20: Existing piping used to distribute recycled water that is not coded per California Health & Safety Code Section 116815 must be approved by DPH. Water Board staff requests the Discharger to present the unmarked piping locations to DPH for their approval. All future piping installed for the use of reclaimed water distribution must adhere to item D.14 requirements.

COMMENT MRR D.27: There is evidence that many of the monitoring wells in Hollister are already over 8 mg/l nitrate. See Hydrogeologic Report, City of Hollister Hydrogeologic Assessment, Geomatrix, May, 2004. The following description of local groundwater nitrate levels is excerpted from page 46 of that report, and is based on groundwater samples collected during the second half of 2003: "Nitrate has a primary MCL of 45 mg/L as nitrate (10 mg/L as nitrogen). Nitrate was detected at concentrations exceeding the standard at 10 of 19 locations where groundwater samples were collected in the San Juan sub basin. Detected concentrations ranged from non-detect (less than 1 mg/L) to 440 mg/L. Nitrate was detected at concentrations exceeding the standards at 3 of 22 locations where groundwater samples were collected in the Hollister West sub basin. Detected concentrations ranged from non-detect to 360 mg/L. The highest concentrations of nitrates are in shallow groundwater in the San Juan sub basin (up to 440 mg/L) in an area of agricultural land use, and in the Hollister West sub basin in an area downgradient of a former poultry facility (up to 360 mg/L). Nitrate was detected at concentrations greater than the MCL in groundwater collected from three water supply wells (GW-7, GW-11, and GW-14) and eight monitoring wells (GW-2, GW-4, GW-6, H-4A, H-5A, H-5B, H-5C, and H-6A) located in agricultural areas, ranging from 56 to 440 mg/L."

ref: Hydrogeologic Report, City of Hollister Hydrogeologic Assessment, Geomatrix, May 2004

RESPONSE COH No. 21: It is unclear if the data presented above are for groundwater downgradient of the DWTP percolation ponds. Provision E.4 requires the Discharger to submit a Groundwater Monitoring Plan by January 31, 2010. The plan must be capable of determining impacts of treated wastewater and recycled water upon underlying groundwater. An expected component of this report will be historical groundwater characteristic data. Water Board staff will move forward with additional requirements, if necessary, regarding the safeguarding of groundwater quality once the Discharger has provided the monitoring plan.

COMMENT MRP SECTION B: The requirement to monitor sulfate, boron, total dissolved solids, sodium, chloride, perchlorate, total trihalomethanes, and total trihaloacetic acid should be deleted.

RESPONSE COH No. 22: Water Board staff requires the influent monitoring for sulfate, boron, total dissolved solids, sodium, chloride, perchlorate, total trihalomethanes, and total trihaloacetic acids in order to determine sources of these constituents that may be detected in the effluent. The requirement to monitor these constituents is not changed.

COMMENT MRP SECTION C: The composite sampling point is located between the membranes and the chlorine contact tank. There is currently no provision to composite sample after the contact tank.

RESPONSE COH No. 23: Item B.5 of the MRR establishes a total suspended solids effluent limitation to be measured after disinfection and prior to the effluent disposal ponds or distribution. Water Board staff recommends the Discharger establish a composite sample method in order to meet the requirements of B.5 and the MRP.

COMMENT MRP SECTION H: The requirement to monitor for perchlorate, total trihalomethanes and total trihaloacetic acid should be deleted since these are not constituents that are present in significant concentrations in the effluent.

RESPONSE COH No. 24: As stated in Note A of MRP Section H table, "Sampling for specific analytes or from specific monitoring wells may be reduced or discontinued after one year upon Discharger request and Executive Officer approval for parameters/constituents for which additional data provides no benefit." Water Board staff are aware of these types of constituents appearing in groundwater analysis, which is currently being attributed to an increase in commercial disinfection products.

COMMENT MRP SECTION I.1: requires submittal of quarterly self-monitoring reports by the City, one month after the end of each quarter. The Reports must include quarterly data submitted by Users on the same quarterly schedule. It may

be difficult to gather all data from all User sites in time to prepare and submit the reports. The Report Due dates listed in the table in Requirement 1-1 should be pushed back 30 days (to March 31, August 31, November 30, and February 28).

RESPONSE: Water Board staff agrees. The Report Due Dates have been modified so that they are due two months after the end of the reporting period. Therefore, quarterly reports will be due May 30, August 31, November 30, and February 28.

COMMENT STANDARD PROVISIONS AND REPORTING REQUIREMENTS (SPARR) A.14: states that all disposal areas shall be on land owned or controlled by the discharger. The distribution of recycled water to properties not owned or directly controlled by the City must be allowed under the MRRO. This could be just a terminology question.

RESPONSE COH No. 25: Water Board staff has excepted requirement A.14 of the standard provisions. This exception is noted in item E.12 of the MRR.

COMMENT MRR B5 AND B.6: 1. Provisions B.5 - B.6. Daily maximum and monthly average limits are not necessary.

The recycled water limitations set forth in Provisions B.5 and B.6 are either technology-based limits, set for BOD and TSS to evaluate to tertiary treatment, or are set based on objectives set as long term annual averages for human health protection over 70 years of exposure from drinking water from that source. Thus, these limits need not be set as daily maximum limits. Further, many of the objectives on which the monthly average limits are based are set to be "annual mean values." See e.g., Basin Plan at 111-13. As such, no need exists to set daily and monthly limits on the recycled water and statistically derived annual average limits would be adequate to protect the quality of the groundwater.

The Regional Board has not performed an analysis under Water Code section 13263, including an analysis of the factors set forth in Water Code section 13241 before imposing the proposed limits. Furthermore, the sampling is not performed on a daily basis to determine compliance with daily limits. The Tentative Order should be revised to impose annual average limits, and perhaps maintain daily, weekly, or monthly average values as "performance goals" instead of enforceable limits.

REQUEST: Remove all of the proposed daily and monthly limits, and impose limits as annual averages to be consistent with Basin Plan requirements, or undertake an analysis under section 13263 of the Water Code to ensure that each of the requisite 13241 factors are considered prior to imposing the currently proposed limits.

RESPONSE COH No. 26: Water Board staff agrees in part with your comments. As noted in Response COH No. 11, staff has removed monthly effluent limits and made them annual effluent limits and added Finding No. 24 of the MRR which states this Order contains restrictions on individual waste constituents to protect the beneficial uses of waters of the state and to implement the Basin Plan water quality objectives. All beneficial uses and water quality objectives contained in the Basin Plan were approved under state law. Water quality objectives in the Basin Plan were adopted in compliance with Water Code section 13241 and, therefore, further evaluation of the factors are not required. However, in adopting these requirements the Water Board has taken into consideration, to the extent relevant, past, present, and probable future beneficial uses of the receiving waters, the environmental characteristics, including water quality, of the lower Salinas River hydrographic unit, coordinated control of all factors which affect water quality in the area, economics, the need to develop and use recycled water, and the need for developing housing within the Region.

COMMENT GENERAL MRR NO. 1: Requirements included without supporting findings and evidence.

The Tentative Order includes many requirements that do not contain supporting findings and evidence. For example, the Tentative Order requires nitrate limits of 7.0 mg/L for Nitrate as N. No explanation is given for this requirement, and this requirement seems particularly stringent when the Basin Plan requires: "Wastes discharged to ground waters shall be free of toxic substances in excess of accepted drinking water standards; taste, odor, or color producing substances; and nitrogenous compounds in quantities which could result in a ground water nitrate concentration above 45 mg/L." See Basin Plan at pg. V-9.

RESPONSE COH No. 27: Water Board staff erroneously set an effluent limit for nitrate in Tables 2 and 3 which should have been for Total Nitrogen (as N). Water Board staff has removed the nitrate effluent limit from both tables and replaced it with the correct effluent limit for Total Nitrogen (as N). A daily maximum of 10 mg/L and an annual average of 5.0 mg/L of Total Nitrogen (as N) has been added to both Tables 2 and 3. The effluent limitation for Total Nitrogen (as N) is based on specific median groundwater objectives for the Hollister sub-basin as set forth in the Basin Plan. See Response COH No. 11. Clarification of the Water Board nitrate error was made evident to the COH in subsequent correspondence. The COH acknowledged the error and are in agreement with the Total Nitrogen (as N) effluent limits.

This comment refers to "many requirements" but it is unclear to Water Board staff what other requirements the Discharger is commenting on.

COMMENT GENERAL MRR NO. 2: Requirements included without supporting findings and evidence.

Similarly, the Tentative Order requires mineral limits more stringent than the lowest Basin Plan objective. For example, the current Total Dissolved Solids limit of 1,200 mg/L as a monthly average is more stringent than the surface water objective for the San Benito River of 1,400 mg/L and more stringent than the annual mean objective of 1,200 mg/L for groundwater.

RESPONSE COH No. 28: See Response COH No. 11.

COMMENT GENERAL MRP NO. 1: Finally, the MRP requires extensive influent monitoring without an explanation as to why these constituents must be monitored in the influent.

RESPONSE COH No. 29: See Response COH No. 22.

COMMENT GENERAL MRR NO. 3: REQUEST: Remove all of the proposed limits more stringent than annual average objectives for groundwater with Basin Plan requirements, or undertake an analysis under section 13263 of the Water Code to ensure that each of the requisite 13241 factors are considered prior to imposing the currently proposed limits.

RESPONSE COH No. 30: Water Board staff addressed this comment in Response COH No. 26.

WATER BOARD MODIFICATIONS

Staff has made various grammatical and formatting modifications to the proposed Order.

MODIFICATION – STAFF REPORT (SR) PAGE 1: The Key Information section, row 7 entitled *Current Disposal Capacity* should not include reference to the 'and two former emergency storage reservoirs.' Therefore, that text has been deleted and replaced with the following text, "...Ponds 1, 2, and 3 west of Highway 156 and Ponds 1, 2, and 3 east of Highway 156. Total capacity for all six seasonal disposal/storage reservoirs is 365 million gallons or 1,120 acre-feet."

MODIFICATION – MRR Table 2: Water Board staff added the word, "Interim" to the title of Table 2, eliminated the ammonia effluent limit requirement, and changed parameter 'Nitrate as N' to 'Total Nitrogen (as N)'. Ammonia will still be monitored on a weekly basis as required by the monitoring and reporting program. The Basin Plan has specific water quality objectives for total nitrogen (as N) for the Hollister groundwater subbasin of 5.0 mg/L and not for nitrate as N.

Water Board staff added footnote 'c' to Table 2. Footnote 'c' states, "Compliance with annual averages will be determined on a rolling 12-month basis."

MODIFICATION – MRR Table 3: Water Board staff modified the final effluent limits for total dissolved solids from 700 mg/L to 1,200 mg/L. The total dissolved solids specific water quality objective for the Hollister groundwater subbasin is 1,200 mg/L therefore this change is to reflect the Basin Plan requirements. Effluent limits for ammonia were eliminated and parameter 'Nitrate as N' was changed to 'Total Nitrogen (as N)'. The Basin Plan has specific water quality objectives for total nitrogen (as N) for the Hollister groundwater subbasin of 5.0 mg/L and not for nitrate as N.

Water Board staff added footnote 'b' to Table 3. Footnote 'b' states, "Compliance with annual averages will be determined on a rolling 12-month basis."

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