# LATE REVISIONS

## AGENDA ITEM 11

October 18, 2024 Board Meeting

LATE REVISIONS – 10 October 2024

### Item 11. City of Yuba City, Wastewater Treatment Facility, Sutter County

Consideration of Tentative Waste Discharge Requirements Order No. R5-2024-XXXX.

1. Make corrections to clarify the arithmetic mean can be used for multiple samples collected in a single day when determining compliance with the maximum daily effluent limitation. The corrections to Waste Discharge Requirements (WDRs) section VII.E.3 and Monitoring and Reporting Program (MRP) section X.B.5. are as follows:

WDRs section VII.E.3

3. When determining compliance with an AMEL, MDEL, or AWEL and more than one sample result is available in a month, day, or week, respectively, the discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of DNQ or ND. In those cases, the discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:

MRP section X.B.5

5. **Multiple Sample Data.** When determining compliance with an AMEL, MDEL, or AWEL and more than one sample result is available in a month, day, or week, respectively, the Discharger shall compute the arithmetic mean unless the data set contains one or more reported determinations of “Detected, but Not Quantified” (DNQ) or “Not Detected” (ND). In those cases, the Discharger shall compute the median in place of the arithmetic mean in accordance with the following procedure:

2. Revised the language in MRP section VIII.B.2.f as follows to clarify how the reduction in groundwater monitoring initiates after two years of quarterly monitoring:

MRP section VIII.B.2.f

f. **Minimum Sampling Frequency.** For each constituent with a 1/Quarter minimum sampling frequency, after two years of quarterly monitoring, the minimum sample frequency can be reduced to twice a year (2/Year).

3. Make corrections to the language in the last paragraph in WDRs sections VI.C.7 and VII.G to clarify that chronic toxicity split samples are for assessing laboratory performance not determining compliance as follows:

WDRs section VI.C.7

The Discharger shall conduct **split sampling from 1 December 2025 through 30 November 2026** per the Workplan in Task i of Table 5 below and shall request the performance metrics per Appendix E of the “*Ceriodaphnia dubia* Quality Assurance Guidance Recommendations” for each participating laboratory. The Discharger shall monitor the laboratory’s long-term performance and evaluate how they meet expectations. The long-term laboratory performance shall provide a measure of the expected consistency of correct identifications of toxicity. In effect, the Discharger will double the chronic toxicity testing for two years, substantially increasing the effort to identify toxicity. The split samples designated by the Discharger as compliance schedule samples for the Laboratory Assessment Final Report are only to be used to assess laboratory performance and shall not be used to determine compliance with the final or interim effluent limitations for chronic toxicity.

WDRs section VII.G

In determining compliance with the interim chronic whole effluent toxicity effluent limitation in section IV.A.2.a (**effective immediately through 31 December 2029**), where the median chronic toxicity units exceed **50 TUc** (as 100/NOEC) for any endpoint, the Discharger will be deemed out of compliance with the interim chronic toxicity effluent limitation if the median chronic toxicity units for any endpoint also exceed a reporting level of 50 TUc (as 100/NOEC) **AND** the percent effect at 2 percent effluent for the same endpoint also exceeds 25 percent. The percent effect used to evaluate compliance with the interim chronic toxicity effluent limitation shall be based on the chronic toxicity bioassay result(s) from the sample(s) used to establish the median TUc result, as described above. If the median TUc is based on two equal chronic toxicity bioassay results, the percent effect of the sample with the greatest percent effect shall be used to evaluate compliance with the interim chronic toxicity effluent limitation. The split samples designated by the Discharger as compliance schedule samples for the Laboratory Assessment Final Report are only to be used to assess laboratory performance and shall not be used to determine compliance with the final or interim effluent limitations for chronic toxicity.

4. Revise the language in the Response to Comments, response to Discharger comment 15, as follows:

RESPONSE: Staff do not concur and retained dissolved arsenic monitoring in groundwater monitoring wells. Dissolved arsenic has been included in groundwater monitoring for recently adopted NPDES permits with significant and consistent hydraulic loading of ponds, which is similar to Yuba City’s pond use. This is due to the potential of this type of disposal pond discharge to cause prolonged periods of oxygen deficiency in the soil-pore liquid and groundwater beneath the ponds, which leads to bacterial reduction of oxidized compounds. Initially nitrate will be reduced to nitrogen gas and manganese oxide in soil will be reduced to soluble manganese. Once nitrate and manganese oxide are reduced and there is still excessive organic carbon present, iron oxide can be reduced to soluble iron. Where arsenic oxide is present in soils and iron oxide is being reduced, it can be similarly be reduced to soluble arsenic. Absent adequate attenuation in the soil profile, soluble forms or iron, manganese, and arsenic may be released to groundwater that may degrade groundwater and threaten to impair its beneficial uses. Therefore, dissolved arsenic monitoring has been retained as part of the groundwater monitoring suite.