

Errata Sheet for
Tentative Order No. R9-2006-0055
NPDES Permit CA 0107611
Waste Discharge Requirements for the
South Orange County Wastewater Authority
Discharges to the Pacific Ocean via the
Aliso Creek Ocean Outfall

1. Page F-20, Rationale For Effluent Limitations and Discharge Specifications, Section IV.B.2, third paragraph (“As described in Section II of this Fact Sheet, SOCWA operates the Ocean Outfall . . .”) has been replaced by the following:

As described in Section II of this Fact Sheet, SOCWA operates the SJCOO which receives treated effluent from the following municipal wastewater treatment plants; the SOCWA Jay B. Latham RTP, the SMWD Chiquita WRP, the MNWD 3A RP, and the City of San Clemente RP. In accordance with the definition contained in 40 CFR 122.2, each of these wastewater treatment plants are considered a POTW. Section 301(b)(1)(B) of the CWA and 40 CFR 125.3(a)(1) require all POTWs to achieve the secondary treatment standards contained in 40 CFR Part 133. Although monitoring the effluent from the contributing POTWs is required in the existing permit for the SJCOO, it does not require compliance with the secondary treatment standards by each jurisdiction and therefore does not provide the ability to enforce against any of the contributing POTWs for not achieving secondary treatment standards as required under the CWA and implementing NPDES permit regulations.

In circumstances such as the SJCOO where other wastewaters are combined prior to discharge, the application of secondary treatment standards to each contributing POTW prevents poorly performing facilities from circumventing technology-based secondary treatment standards through dilution. Based on review of the data provided in the SOCWA permit renewal application, the relatively high reported maximum CBOD and BOD values for each of the contributing jurisdictions would indicate the potential for possible exceedances of the weekly average limitations specified in the secondary treatment standards.

In regards to application of the secondary treatment standards, the USEPA NPDES Permit Writers' Manual (EPA-833-B-96-003) states:

"To ensure compliance with secondary treatment standards (for POTWs only) - Certain POTWs include treatment processes that are ancillary to the secondary treatment process that may impact their ability to monitor for

compliance with secondary treatment standards. Under these circumstances, the permit writer may consider requiring monitoring for compliance with secondary treatment standards just after the secondary treatment process (e.g., require monitoring of effluent just after secondary clarification) before any additional treatment processes."

Therefore, independently applying the secondary treatment standards to the SOCWA Jay B. Latham RTP, the SMWD Chiquita WRP, the MNWD 3A RP, and the City of San Clemente RP in the permit is consistent with USEPA interpretation of 40 CFR Part 133 as it applies to secondary treatment plant effluent being combined with other wastewaters and sharing common outfalls. The independent application of the secondary treatment standards in the permit is also consistent with other similar permits issued by the Regional Water Board, including for example, Addendum No. 3 to Order No. 2001-08 for the SOCWA Aliso Creek Ocean Outfall; Order No. R9-2005-0136 for the City Of Oceanside San Luis Rey and La Salina Wastewater Treatment Plants; and Order No. R9-2005-0219 for the Encina Water Pollution Control Facility, Vallecitos Water District's Meadowlark Water Reclamation Plant and the Buena Sanitation District's Shadowridge Water Reclamation Plant.

2. Page 6, paragraph 1 (Section II.B):

The first sentence has been modified as follows:

The SOCWA Coastal TP is owned and operated by SOCWA ~~and Moulton Niguel Water District~~ and treats raw wastewater generated in the South Coast Water District, the City of Laguna Beach, and the Emerald Bay Services District.

3. Page 25, Provisions Section VI.C.2.b.1.b), Section VI.C.2.b.2.b), and Section VI.C.2.b.3.b):

The last sentence was modified as follows:

The Discharger shall submit the written report using the Sanitary Sewer Overflow Report Form (June 13, 2001) provided under Regional Water Board Order No. 96-04 or a similar form that provides the same information.

4. Page 32, The first sentence of the Compliance Determination and Enforcement Provisions Section VII.C has been modified as follows:

The discharger shall determine the daily effluent value (DEV) for a given parameter from the results of a flow-weighted 24-hour composite sample collected during a calendar day (12:00 am through 11:59 pm) or any continuous 24-hour period that ~~ends on and~~ reasonably represents a given calendar day for purposes of sampling. The 24-hour periods shall not vary from day to day and shall not overlap.

5. Page E-8, Table 3, has the following changes:

Table 3. Municipal Wastewater Treatment Plant Effluent Monitoring

Parameter	Units	Sample Type ¹	Minimum Sampling Frequency
Flow ²	MGD	Recorder / Totalizer	Continuous
CBOD ₅	mg/L	24 Hr Composite	Daily ³
BOD ₅	mg/L	24 Hr Composite	Monthly
TSS	mg/L	24 Hr Composite	Daily ³
pH	mg/L -pH units	Grab	Daily ³
Oil and Grease	mg/L	Grab	Monthly
Settleable Solids	ml/L	Grab	Daily ³
Turbidity	NTU	24 Hr Composite	Weekly ³
CBOD ₅ , Percent Removal	%	Calculate	Daily ³
TSS, Percent Removal	%	Calculate	Daily ³

¹ For samples which are to be physically composited prior to analyses, or for the results of analyses that are to be arithmetically composited, the basis for compositing shall be the rate of discharge to the ocean, not the rate of inflow to the plant.

² Report the total daily effluent flow and the monthly average effluent flow.

³ Five days per week except seven days per week for at least one week during July or August of each year.

6. Page E-11, Table 5, Brine Discharge Effluent Monitoring, has been modified as follows:

Table 5. IDP Brine Discharge Effluent Monitoring

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow ¹	MGD	Recorder / Totalizer	Continuous
TSS	mg/L	24 Hr Composite	Weekly, Monthly
<u>Turbidity</u>	<u>NTU</u>	<u>24 Hr Composite</u>	<u>Monthly</u>
pH	mg/L -pH units	Grab	Weekly, Monthly
Oil and Grease	mg/L	Grab	Weekly, Monthly
Settleable Solids	ml/L	Grab	Weekly, Monthly

¹ Report the total daily effluent flow and the monthly average effluent flow.

7. Page E-11, Table 6, Treated Nuisance Discharge Effluent Monitoring, has been modified as follows:

Table 6. Treated Groundwater Discharge Effluent Monitoring

Parameter	Units	Sample Type	Minimum Sampling Frequency
Flow ¹	MGD	Recorder / Totalizer	Continuous
TSS	mg/L	24 Hr Composite	Weekly, Monthly
<u>Turbidity</u>	<u>NTU</u>	<u>24 Hr Composite</u>	<u>Monthly</u>
pH	mg/L-pH units	Grab	Weekly, Monthly
Oil and Grease	mg/L	Grab	Weekly, Monthly
Settleable Solids	ml/L	Grab	Weekly, Monthly
Acrolein	µg/L	Grab	Monthly
Acrylonitrile	µg/L	Grab	Monthly
Benzene	µg/L	Grab	Monthly
Carbon Tetrachloride	µg/L	Grab	Monthly
Chlorobenzene	µg/L	Grab	Monthly
Chlorodibromomethane	µg/L	Grab	Monthly
Chloroform	µg/L	Grab	Monthly
Dichlorobromomethane	µg/L	Grab	Monthly
Dichloromethane	µg/L	Grab	Monthly
1,2-Dichloroethane	µg/L	Grab	Monthly
1,1-Dichloroethylene	µg/L	Grab	Monthly
1,3-Dichloropropene	µg/L	Grab	Monthly
Ethylbenzene	µg/L	Grab	Monthly
Halomethanes	µg/L	Grab	Monthly
1,1,2,2-Tetrachloroethane	µg/L	Grab	Monthly
Tetrachloroethylene	µg/L	Grab	Monthly
1,1,1-Trichloroethane	µg/L	Grab	Monthly
1,1,2-Trichloroethane	µg/L	Grab	Monthly
Trichloroethylene	µg/L	Grab	Monthly
Toluene	µg/L	Grab	Monthly
Vinyl Chloride	µg/L	Grab	Monthly

¹ Report the total daily effluent flow and the monthly average effluent flow.

8. Page E-16, Receiving Water Monitoring Requirements Section VI.A:
The following has been added as Section VI.A. 5:

In the event of stormy weather which makes sampling hazardous at certain surf zone stations, collection of samples at such stations can be omitted, provided that such omissions do not occur more than 5 days in any calendar year or occur at consecutive sampling times. The observations listed in (2) above shall still be recorded and reported to the

Regional Board for these stations at the time the sample was attempted to be collected.

9. Page F-45, Receiving Water Monitoring Section D.3:

The last sentence in this section has been modified as follows:

In addition, intensive monitoring requirements, which are required from July 1, 2008 through June 30, 2009 or at the request of the Executive Officer at the offshore stations, have been included for temperature, salinity, and depth at 1-meter intervals; for dissolved oxygen and light transmittance in surface, mid-depth, and bottom samples; and pH at the surface on a year-round, monthly basis to provide adequate data for evaluating initial dilution.

10. Page F-18 Other Plans, Policies, and Regulations Section E.2:

The following has been added to the end of the Section E.2, page F-18:

The required certification can be in the form of a letter with supporting documentation (e.g., site diagram depicting site drainage and locations of storm drains). The certification should be signed by a responsible official in accordance with the signatory requirements specified in Attachment D, Section V.B.

11. Page 1, Table 3: The effective date has been changed to October 1, 2006.

12. Page 1, Table 3; Page 22, Provisions Section VI.A.2.g; page E-17, Receiving Water Monitoring Requirements Section VI.B.2; page E-18, Receiving Water Monitoring Requirements VI.C.2; page E-18, Receiving Water Monitoring Requirements VI.D: The date August 1, 2011 has been replaced by October 1, 2011.

13. Page F-28, Rationale For Effluent Limitations and Discharge Specifications Section IV.C.5.a, has been modified as follows:

Table 16. New Toxic Pollutants and Corresponding Performance Goals Based on the 2005 California Ocean Plan

Pollutant	Units	Monthly Average
Chlorodibromomethane	µg/L	868.6 2,244.6
Dichlorobromomethane	µg/L	626.2 1,618.2
N-nitrosodi-N-propylamine	µg/L	38.38 99.18
Heptachlor Epoxide	µg/L	0.002 0.005

14. Page F-28, Rationale For Effluent Limitations and Discharge Specifications Section IV.C.5.b, has been modified as follows:

Table 17. Toxic Pollutant Effluent Limitations or Performance Goals Based on the 2005 California Ocean Plan

Pollutant	Units	Performance Goal Monthly Average
1,1-Dichloroethylene	µg/L	90.9 <u>234.9</u>
Isophorone	µg/L	73,730.0 <u>190,530.0</u>
Tetrachloroethylene	µg/L	202.0 <u>522.0</u>
Thallium	µg/L	202.0 <u>522.0</u>
1,1,2,2-Tetrachloroethane	µg/L	232.3 <u>600.3</u>
1,1,2-Trichloroethane	µg/L	949.4 <u>2,453.4</u>
1,2-Dichloroethane	µg/L	2,828.0 <u>7,308.0</u>
Heptachlor	µg/L	0.005 <u>0.0131</u>

15. Page E-16, Receiving Water Monitoring Requirement VI.A. The first paragraph is modified as follows:

“Unless otherwise authorize by this Regional Board, all surf zone stations shall be monitored as follows: ...”

16. Page E-19, Benthic Monitoring D.2. The following is added to the start of the paragraph titled, *Infauna*.

“Unless an acceptable alternative method is approved by this Regional Board prior to application, samples shall be collected with a Patterson, Smith-McIntyre, or”