

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

RESPONSE TO WRITTEN COMMENTS

on Tentative Order for
Town of Yountville Wastewater Reclamation Facility and Wastewater Collection System
Yountville, Napa County

The Regional Water Board received a written comment from the Town of Yountville on a tentative order distributed for public review. The comment is summarized below in *italics* (paraphrased for brevity) and is followed by a staff response. For the full content and context of the comment, please refer to the comment letter. To request copies of the letter, see the contact information provided in Fact Sheet section VIII.G of the revised tentative order.

Revisions are shown with strikethrough ~~text~~ for deletions and underline text for additions.

Comment: *Yountville requests that effluent monitoring locations and requirements be modified to more accurately represent plant operations. The draft order defined separate monitoring locations for advanced secondary-treated effluent and secondary-treated effluent downstream of the plant’s effluent storage pond. Yountville states that all effluent, whether advanced secondary-treated or only secondary-treated, is routed to the same effluent storage pond after disinfection. The effluent mixes in the storage pond, and, as a result, flows of the two types of effluent cannot be measured separately downstream of the pond.*

Response: We agree and revised section 4.1 of the tentative order as follows (these revisions include minor formatting changes):

Effluent Limitations. The discharge at Discharge Point 001 shall meet the following effluent limitations, with compliance measured at Monitoring Locations EFF-001A, EFF-001S, and EFF-001T and ~~EFF-001D~~ as described in the MRP:

Table 2. Effluent Limitations

Parameter	Units	Monitoring Location	Average Monthly	:
Biochemical Oxygen Demand 5-day @ 20°C	mg/L	EFF-001D <u>EFF-001S and EFF-001T</u>	15 ^[1]	:
Total Suspended Solids	mg/L	EFF-001D <u>EFF-001S and EFF-001T</u>	15 ^[1]	:
pH ^[2]	standard units	EFF-001D <u>EFF-001S and EFF-001T</u>	-	:
Oil and Grease	mg/L	EFF-001A	10	:
:	:	:	:	:

We revised section 4.2 as follows:

Percent Removal. The average monthly percent removal of biochemical oxygen demand (BOD) and total suspended solids (TSS) at Discharge Point 001 shall not be less than 85 percent (i.e., in each calendar month, the arithmetic mean of BOD and TSS, by concentration, of effluent samples collected at Monitoring Locations EFF-001D EFF-001S and EFF-001T as described in the MRP, shall not exceed 15 percent of the arithmetic mean of BOD and TSS, by concentration, of influent samples collected at Monitoring Location INF-001 as described in the MRP, at approximately the same times during the same periods).

We revised section 4.3 as follows:

E. coli Bacteria. The discharge at Discharge Point 001 shall meet the following *Escherichia coli* (*E. coli*) effluent limitations, with compliance measured at Monitoring Locations EFF-001D EFF-001S and EFF-001T as described in the MRP...

We revised section 4.4 as follows:

Total Coliform. The discharge at Discharge Point 001 shall meet the following total coliform effluent limitations, with compliance measured at Monitoring Locations EFF-001D EFF-001S and EFF-001T as described in the MRP...

We revised Monitoring and Reporting Program (MRP) Table E-1 as follows:

Table E-1. Monitoring Locations

Discharge Point	Monitoring Location	Monitoring Location Description
Influent	INF-001	A point in the treatment plant headworks at which all waste tributary to the treatment system is present, preceding any phase of treatment, and exclusive of any return flows or process side streams that significantly affect the quantity or quality of the influent.
Effluent	EFF-001A	A point in the treatment plant following all treatment and downstream of the effluent storage pond that represents all advanced secondary-treated flow tributary to Discharge Point 001.
Effluent	EFF-001S	A point in the treatment plant following all treatment, including disinfection, and downstream of the effluent storage pond that represents all secondary-treated flow routed around the advanced secondary filter and tributary to Discharge Point 001 <u>the effluent storage pond</u> .
Effluent	EFF-001D <u>EFF-001T</u>	A point in the treatment plant following all treatment, including disinfection, but upstream of the effluent storage pond that represents all <u>advanced secondary-treated flow tributary to the effluent storage pond</u> .

Discharge Point	Monitoring Location	Monitoring Location Description
Recycled Water	REC-001	A point after full treatment, including disinfection, that represents all flow directed to offsite recycled water use.
⋮	⋮	⋮

We revised MRP section 4.1 as follows:

When discharging at Discharge Point 001, the Discharger shall monitor treatment plant effluent at Monitoring Locations EFF-001A and ~~EFF-001S~~ as follows:

Table E-3. Effluent Monitoring – Monitoring Locations EFF-001A and ~~EFF-001S~~

Parameter	Unit	Sample Type	Minimum Sampling Frequency	Sampling Location
Flow ^[1]	MG/MGD	Continuous	Continuous/D	EFF-001A and EFF-001S
⋮	⋮	⋮	⋮	⋮
Municipal and Agricultural Supply Pollutants ^[8]	µg/L	Grab	Once	EFF-001A
River Flow-to-Effluent Flow Ratio ^[9]	-	Calculated	1/Day	EFF-001A and EFF-001S

Footnotes:

^[1] The following flow information shall be reported in monthly self-monitoring reports:

- Daily average flow rate (MGD)
- Total monthly flow volume (MG)

⋮

^[9] The Discharger shall calculate and report the river flow-to-effluent flow ratio once per day when discharging to the Napa River. The river flow-to-effluent flow ratio shall be calculated as the ratio of the instantaneous flow of the Napa River measured at USGS Station No. 11458000 (at 8:00 a.m. every morning) to the summed average effluent flows during the subsequent 24 hours (8:00 a.m. to 8:00 a.m.) measured at Monitoring Locations ~~EFF-001A and EFF-001S~~.

We revised MRP section 4.2 as follows:

The Discharger shall monitor treatment plant effluent at Monitoring Locations ~~EFF-001D~~ EFF-001S (when influent flow exceeds the capacity of the advanced secondary filtration system) and EFF-001T (under normal operating conditions) as follows:

Table E-4. Effluent Monitoring – Monitoring Locations ~~EFF-001D~~ EFF-001S and EFF-001T

Parameter	Unit	Sample Type	Minimum Sampling Frequency
Flow ^[1]	MGD	Continuous	Continuous/D
⋮	⋮	⋮	⋮

We revised Fact Sheet Table F-2 as follows:

Table F-2. Previous Effluent Limitations and Monitoring Data

Parameter	Unit	Monitoring Location	Average Monthly Limit	:
Biochemical Oxygen Demand (5 day @ 20°C) (BOD)	mg/L	EFF-001D EFF-001B [2]	15 [3]	:
Total Suspended Solids (TSS)	mg/L	EFF-001D EFF-001B [2]	15 [3]	:
BOD percent removal	%	EFF-001D EFF-001B [2]	85 (minimum)	:
TSS percent removal	%	EFF-001D EFF-001B [2]	85 (minimum)	:
Oil and Grease	mg/L	EFF-001A	10	:
pH	s.u.	EFF-001D EFF-001B [2]	-	:
Chlorine, Total Residual	mg/L	EFF-001A	-	:
:	:	:	:	:
Zinc, Total Recoverable	µg/L	EFF-001A	180	:
Total Coliform	MPN/100 mL	EFF-001D EFF-001B [2]	-	:
Acute Toxicity	% survival	EFF-001A	-	:

Footnotes:

[1] Based on monitoring data for August 2015 through February 2020.

[2] Monitoring Locations ~~EFF-001D~~ was ~~EFF-001T~~ and ~~EFF-001S~~ were collectively referred to as EFF-001B during the previous order term.

[3] The BOD and TSS limitations were 30 mg/L (average monthly) and 45 mg/L (average weekly) when the influent flow exceeded the capacity of the advanced secondary filtration system.

:

We revised Fact Sheet Table F-11 as follows, also correcting minor typographical errors:

Table F-11. Monitoring Requirements Summary

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001A ^[2]	Effluent EFF-001S and EFF-001T ^[2]	Effluent EFF-001D ^[2]	Effluent REC-001 ^[2]	Receiving Water RSW-001 ^[2]	Receiving Water RSW-002 ^[2]	Receiving Water RSW-003 ^[2]
Flow	Continuous/D	Continuous/D	Continuous/D	Continuous/D	Continuous/D	-	-	-
BOD	1/Week	-	- 1/Week	1/Week	-	-	-	-
TSS	1/Week	-	- 1/Week	1/Week	-	-	-	-
Oil and Grease	-	1/Quarter	-	-	-	-	-	-

Parameter ^[1]	Influent INF-001 ^[2]	Effluent EFF-001A ^[2]	Effluent EFF-001S and EFF-001T ^[2]	Effluent EFF-001D ^[2]	Effluent REC-001 ^[2]	Receiving Water RSW-001 ^[2]	Receiving Water RSW-002 ^[2]	Receiving Water RSW-003 ^[2]
pH	-	1/Quarter	- 1/Day	1/Day	-	-	- 2/Year	2/Year
Turbidity	-	-	- Continuous/ D	Continuous/ D	-	-	-	-
Temperature		1/Quarter	-	-	-	-	- 2/Year	2/Year
Chlorine, Total Residual	-	Continuous/ 2H	-	-	-	-	-	-
Ammonia, Total	-	1/Quarter	-	-	-	-	2/Year	2/Year
Copper, Total Recoverable	-	1/Month	-	-	-	-	2/Year	2/Year
Acute Toxicity	-	1/Quarter	-	-	-	-	-	-
<i>E. Coli</i> Bacteria	-	-	- 1/Week	1/Week	-	-	-	-
Hardness	-	-	-	-	-	-	-	2/Year
Total Coliform Bacteria	-	-	- 1/Week	1/Week	-	-	-	-
Priority Pollutants	-	Once	-	-	-	Once	-	-
Municipal and Agricultural Supply Pollutants	-	Once	-	-	-	Once	-	Once
River Flow-to-Effluent Flow Ratio	-	1/Day	1/Day	-	-	-	-	-