CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

RESPONSE TO WRITTEN COMMENTS

on Tentative Order for
City of Petaluma Ellis Creek Water Recycling Facility
Petaluma, Sonoma County

The Regional Water Board received written comments from the City of Petaluma on a tentative order distributed for public comment. The comments are summarized below in *italics* (paraphrased for brevity) and are followed by a staff response. For the full content and context of the comments, please refer to the comment letters. To request copies of the letters, see the contact information provided in Fact Sheet section 8.7 of the revised tentative order.

Revisions are shown with strikethrough ~~text~~ for deletions and underline <u>text</u> for additions.

City of Petaluma

Comment 1: *The City requests removal of the phrase "during wet weather" when defining flow routed to the oxidation ponds not constituting a bypass.*

Response: We did not make any changes in response to this comment. Routing flow directly to the oxidation ponds without wet weather conditions would make the Siemens Orbal activated sludge system optional. This biological process is necessary to ensure full treatment, except in the case of wet weather, where, as stated in the tentative order, biological treatment in the oxidation ponds and constructed wetlands is adequate because influent wastewater is significantly diluted. The City mentions the need for operational flexibility if it needs to rehabilitate portions of the treatment unit. Bypasses are already allowed for essential maintenance in Attachment D section 1.7.2.

Comment 2: *The City requests that we update the Endangered Species Act section number to reflect that it will receive a permit from the Army Corps of Engineers based on consultations with the National Marine Fisheries Service and U.S. Fish and Wildlife Service under section 7 of the Endangered Species Act.*

Response: We agree and revised Provision 6.3.5.4.7 as follows:

> If NMFS and/or USFWS determine that discharges from Discharge Point 002 are likely to adversely affect threatened or endangered species and sufficient mitigation is impossible, documentation of NMFS and/or USFWS authorization for a potential take under section <u>7</u> ~~10~~ of the Endangered

Species Act (otherwise the Discharger shall not commence discharge at Discharge Point 002);

Comment 3*: The City requests that we use one significant figure for chronic toxicity accelerated monitoring triggers consistent with the previous order (Order R2-2016-0014) and Basin Plan Table 4-5.*

Response: We agree and revised Monitoring and Reporting Program (MRP) section 5.2.1.3.2 as follows:

> The Discharger shall accelerate monitoring to monthly after exceeding a three-sample median of 1~~.0~~ TUc or a single sample maximum of 2~~.0~~ TUc for discharges from Discharge Point 001 or 002. Based on the TUc results, the Executive Officer may specify a different frequency for accelerated monitoring to ensure that accelerated monitoring provides useful information.

Comment 4: *The City requests that we clarify receiving water monitoring locations to ensure that receiving monitoring samples will be useful depending on whether discharges occur through Discharge Point 001 or Discharge Point 002.*

Response: We agree and revised the footnotes of Monitoring and Reporting Program (Attachment E) Table E-4 as follows (these revisions include a change in response to Comment 5):

> Footnotes:
>
> [1] Ammonia monitoring shall be performed on the same day as pH and temperature monitoring.
>
> [2] While discharging from Discharge Point 001, monitoring is not required at Monitoring Locations RSW-004, RSW-005, and RSW-006. While discharging from Discharge Point 002, monitoring is not required at Monitoring Locations RSW-001, RSW-002A, ~~and~~ RSW-002B, and RSW-003R.
>
> [3] The Discharger shall monitor at Monitoring Location RSW-002A while discharging from Discharge Point 001 and at Monitoring Location RSW-005 while discharging from Discharge Point 002 for the pollutants listed in Attachment G, Table B.
>
> ~~[4] The Discharger shall collect C-24 samples for metals.~~
>
> [4~~5~~] Standard Observations are specified in Attachment G section 3.2.1.

We revised Fact Sheet (Attachment F) section 7.1.4 as follows:

> **Receiving Water Monitoring.** Petaluma River monitoring is necessary to characterize the receiving water and the effects of the discharges this Order authorizes. Monitoring Locations RSW-004, ~~and~~ RSW-005, and RSW-006 were added to provide upstream and downstream monitoring locations for Discharge Point 002. The tidal slough itself is too muddy and shallow for an accessible monitoring station; therefore, the receiving water monitoring locations are established in the Petaluma River at its confluence with the tidal slough that connects to Discharge Point 002.

We also revised the Fact Sheet Table F-8 and its footnotes as follows (these revisions include changes in response to Comment 6):

Table F-8. Monitoring Requirements Summary

Parameter [1]	**Influent INF-001** [2]	**Effluent EFF-001** [2]	**Effluent REC-001** [2]	**Receiving Water RSW-001, RSW-002A, RSW-002B, RSW-003R** [2, 8]	**Biosolids BIO-001** [2]
Flow	Continuous/D	Continuous/D	Continuous/D	-	-
⋮	⋮	⋮	⋮	⋮	⋮
Copper, Total Recoverable	-	1/Month	-	-	-
Cyanide	1/Month	1/Month	-	-	~~1/Quarter~~ 2/Year
Dioxin-TEQ	-	1/Year [9]	-	-	-
⋮	⋮	⋮	⋮	⋮	⋮
Dissolved Oxygen	-	-	-	1/Month	-
VOC [3]	2/Year	2/Year [9]	-	-	~~1/Quarter~~ 2/Year
BNA [4]	2/Year	2/Year [9]	-	-	~~1/Quarter~~ 2/Year
Metals [5]	1/Month	1/Month	-	-	1/Quarter
⋮	⋮	⋮	⋮	⋮	⋮
Priority Pollutants (except VOCs, BNAs, and chlorinated pesticides) [7]	-	Once	-	Once	-

Footnotes:

⋮

[8] While discharging from Discharge Point 001, monitoring is not required at Monitoring Locations RSW-004, ~~and~~ RSW-005, and RSW-006. While discharging from Discharge Point 002, monitoring is not required at Monitoring Locations RSW-001, RSW-002A, RSW-002B, and RSW-003R.

⋮

Comment 5: *The City requests that we remove the requirement to collect 24-hour composite samples for metals in the receiving water.*

Response: We agree and deleted Table E-4 footnote 4 as shown with our response to Comment 4.

Comment 6: *The City requests that we change the biosolids monitoring frequency for volatile organic compounds, base/neutral and acid extractable organic compounds, and total cyanide from quarterly to twice per year.*

Response: We agree. We revised Table F-8 as shown in our response to Comment 4 and Table E-5 as follows:

Table E-5. Pretreatment and Biosolids Monitoring

Parameters	Influent (INF-001) Sampling Frequency [1]	Effluent (EFF-001) Sampling Frequency [1]	Biosolids (BIO-001) Sampling Frequency	Influent and Effluent Sample Type	Biosolids Sample Type [2]
VOC [3]	2/Year	2/Year	~~1/Quarter~~ 2/Year	Grab	Grab
BNA [4]	2/Year	2/Year	~~1/Quarter~~ 2/Year	Grab	Grab
Metals [5]	1/Month	1/Month	1/Quarter	C-24 [6]	Grab
Cyanide, Total [7]	1/Month	1/Month	~~1/Quarter~~ 2/Year	Grab	Grab
Mercury	1/Month	1/Month [8]	1/Quarter	Grab	Grab

Comment 7: *The City requests minor editorial changes.*

Response: We agree and revised Provision 6.3.5.4.5 as follows:

> Written correspondence from NMFS and/or USFWS that either (a) includes a finding ~~that~~ that discharges from Discharge Point 002 are unlikely to adversely affect threated or listed species and/or critical habitat; or (b) determines that discharges from Discharge Point 002 are likely to adversely affect threatened or endangered species;

We also revised the second paragraph of Fact Sheet section 4.4.2 as follows:

> This Order authorizes the relocation of the outfall from Discharge Point 001 to Discharge Point 002, which is 3,000 feet northeast of Discharge Point 001. … Both the current outfall and the relocated outfall are expected to have comparable effects on Petaluma River water quality because of the ~~nearby~~ proximity of the discharges to the same receiving water. Although relocating the outfall will increase the spatial extent of the cyanide and chronic toxicity mixing zones, the spatial extent of the mixing zones is insignificant when compared to the entire Petaluma River (see Fact Sheet section 4.3.4.2).