

California Regional Water Quality Control Board San Francisco Bay Region

RESPONSE TO WRITTEN COMMENTS

On the Tentative Order for
American Canyon Water Reclamation Facility and Collection System,
American Canyon, Napa County

The Regional Water Board received one comment, from the City of American Canyon, on a draft NPDES permit (tentative order) distributed for public comment on April 18, 2022. The comment is summarized below in *italics* (paraphrased for brevity), followed by staff's response. For the full content and context of the comment, please refer to the comment letter. To request a copy of the letter, see the contact information provided in Attachment F, section 8.7, of the Revised Tentative Order.

The Revised Tentative Order contains minor editorial and formatting changes to the tentative order distributed for public comment.

City of American Canyon Comment

The City requests that the January 8 and May 7, 2020, effluent nickel results (8.4 and 22 micrograms per liter [$\mu\text{g}/\text{L}$]) be excluded from the data used to evaluate reasonable potential and for calculating effluent limits. The City states that both results are more than three standard deviations greater than the mean of the effluent nickel data set when they are excluded and are thus unrepresentative of the treatment plant's effluent.

Response

We did not revise the tentative order. While these two nickel results are much higher than the other nickel results, that alone does not mean they are incorrect or unrepresentative of potential discharge conditions. Nothing in the comment letter or available sample collection records or laboratory reports suggests that these sample results are invalid (e.g., due to a laboratory error). In fact, the City certified these results in accordance with Attachment D section V.B of the previous order. Attachment G section V.C.1.a.5 of the previous order provided a means for the City to show that results should be invalidated, but the City was unable to do so. Therefore, we retained these values for purposes of our analysis and effluent limit calculations. If the City is correct that they are not representative of foreseeable discharge quality, then the City can readily comply with the new nickel effluent limitations in the Revised Tentative Order because all the other reported nickel concentrations were no higher than 5.3 $\mu\text{g}/\text{L}$, which is below the new average monthly effluent limitation of 6.6 $\mu\text{g}/\text{L}$.