

**California Regional Water Quality Control Board  
San Francisco Bay Region**

**RESPONSE TO WRITTEN COMMENTS**

On the Tentative Order for  
Sonoma Valley County Sanitation District Wastewater Treatment Plant  
and sanitary sewer system  
Sonoma, Sonoma County

The Regional Water Board received written comments from Sonoma Valley County Sanitation District on a tentative order distributed for public comment on October 15, 2024. District comments 1, 4, and 6 through 11 requested minor editorial and formatting changes, which we incorporated into the Revised Tentative Order. Comments 2, 3, and 5 are summarized below in *italics* (paraphrased for brevity) and followed by a staff response. For the full content and context of the comments, refer to the comment letter. To request a copy of the comment letter, see the contact information provided in Fact Sheet section 8.5 of the Revised Tentative Order.

Revisions are shown with ~~strikethrough~~ for deletions and underline for additions. This document also contains staff-initiated minor editorial and formatting changes.

***Comment 2:*** *The District requests that Attachment A, Routine Monitoring, be revised to remove the surveillance monitoring language because the tentative order does not require the District to undertake surveillance monitoring.*

**Response:** We revised Attachment A, Routine Monitoring, as follows:

**Routine Monitoring**

Regular chronic toxicity monitoring required during the permit term.  
Routine monitoring results may trigger MMEL compliance tests. If a violation of the MDEL or MMEL occurs, Routine monitoring also includes one sample collected during the following month (regardless of the regular monitoring frequency), which is used to determine if a TRE is necessary.  
~~Routine monitoring does not include surveillance monitoring.~~

***Comment 3:*** *The District requests that the definition of “Surveillance Monitoring” be removed from Attachment A because the tentative order does not require the District to undertake surveillance monitoring.*

**Response:** We deleted the definition of “Surveillance Monitoring” from Attachment A as follows:

**Surveillance Monitoring**

~~Chronic toxicity monitoring performed using the most sensitive species at an effluent concentration at least double the IWC. Surveillance monitoring results are not for assessing compliance with the chronic toxicity MMEL or MDEL.~~

**Comment 5:** *The District requests that Attachment E, section 5.2.4, be revised to remove the surveillance monitoring language because the tentative order does not require the District to undertake surveillance monitoring.*

**Response:** We revised Attachment E, section 5.2.4, as follows:

End point values for the control and IWC sample (e.g., number of young, growth rate, percent survival). For routine monitoring and MMEL compliance tests, the Discharger shall report the results as either “pass” or “fail,” and the percent effect at the IWC for each endpoint. ~~For surveillance monitoring (see MRP § 5.4), the Discharger shall report the results as either “pass” or “fail” and the percent effect at 10 percent effluent for each endpoint.~~