

Central Valley Regional Water Quality Control Board
11/12 September 2008 Board Meeting
Response to Comments for the Placer County Service Area No. 28, Zone No. 6
Sheridan Wastewater Treatment Plant
Tentative Resolution Amending Waste Discharge Requirements
(Rescinding NPDES Permit)
and Rescinding Cease and Desist Order

The following are Regional Water Quality Control Board (Regional Water Board) staff responses to comments regarding the tentative Resolution to amend Waste Discharge Requirements Order No. R5-2002-0208 and rescind Cease and Desist Order (CDO) No. R5-2002-0209 for the Placer County Service Area No. 28, Zone No. 6 Sheridan wastewater treatment plant (WWTP). The tentative Resolution proposes to: (1) rescind the NPDES portion of the WDRs (NPDES Permit No. CA0079341), (2) modify waste discharge requirements for land disposal, and (3) rescind the existing CDO.

The Regional Water Board received comments from Placer County regarding the proposed Resolution for consideration of adoption at the 11/12 September 2008 Regional Water Board meeting:

Written comments are summarized below, followed by Regional Water Board staff responses.

PLACER COUNTY SERVICE AREA No. 28, ZONE NO. 6 (DISCHARGER)

DISCHARGER – PRIMARY COMMENTS: The Sheridan WWTP has historically discharged most of its wastewater to land through crop irrigation, and has had an NPDES Permit for discharge of excess wastewater during wet weather periods. The wastewater treatment facilities are being rebuilt to provide a higher and more dependable level of treatment. In its public comments and in a 13 August 2008 meeting with Regional Water Board staff, the Discharger requested that (1) the proposed Resolution only include the removal of the NPDES permit portion of WDR Order No. R5-2002-0208 (resulting in the proposed rescission of NPDES Permit No. CA0079341), and rescission of the existing Cease and Desist Order (CDO) No. R5-2002-0209. Additionally, the Discharger has concern regarding the proposed amendments to storage and land disposal requirements, which include a lower regulated discharge flow and an increase in monitoring and reporting requirements. The Discharger stated that the proposed lowered regulated flow does not reflect Placer County's recent and proposed facility expansion projects, and requested that the amendments to the storage and land disposal requirements in the existing WDR Order be removed from the tentative Resolution.

In 2006, the Discharger constructed a new lined seasonal storage reservoir that provides the necessary volume to contain 100-year high flows. As required in the existing CDO, the Discharger ceased discharge to surface water in 2006 by routing all discharge to land. In 2008, the Discharger completed necessary improvements on an additional 7.4 acres of leased land for disposal by spray irrigation. Both the storage reservoir and the expanded spray irrigation area are currently in use. The Discharger is in the process of completing a

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geotechnical investigation, a Title 22 engineering report and a revised water balance to reflect the improvements that will fully complete the land disposal facility.

RESPONSE: Regional Water Board staff has discussed the Discharger's recent actions that have resulted in an increase of wastewater storage and disposal capacity, and the cease of discharge to surface waters. Staff concurs that the proposed amendment to the storage and land discharge requirements are premature and that it is necessary to incorporate new information from the recent facility expansion and from the geotechnical investigation, Title 22 engineering report and water balance currently in progress. Therefore, the amendment to the storage and land disposal requirements is no longer proposed in the tentative Resolution. The tentative Resolution is now solely proposing rescission of NPDES Permit No. CA0079341 and CDO No. R5-2002-0209.

DISCHARGER – ADDITIONAL COMMENTS: The Discharger provided the following detailed comments on the proposed amendments to the storage and land disposal requirements in the existing WDR Order.

Regulated Discharge and Facility Capacity: The Discharger commented that the proposed amendments are based on a WWTP discharge of 0.04 mgd, which is based on outdated water balance information. Since the submittal of the original Report of Waste Discharge, the Discharger has implemented collection system improvements, significantly decreasing its infiltration and inflow (I/I). Additionally, the original water balance information did not incorporate information from (1) the recent storage expansion project that contains 100-year storm flows, and (2) current geotechnical investigations and Title 22 engineering report conclusions.

Effluent Limitations: The Discharger commented that the proposed effluent limitations for biochemical oxygen demand (BOD) and total dissolved solids (TDS) in the land discharge are new and more stringent limitations. The Discharger comments that mechanical facility improvements to treat BOD to the proposed regulated concentration of 45 mg/l for land disposal are currently under design and a compliance schedule may be necessary when the more stringent BOD effluent limitations are adopted. Furthermore, the Discharger states that it was not previously required to monitor for effluent TDS and time is needed to collect more data to determine if compliance can be achieved.

Facility Upgrades: The Discharger provided detailed comments regarding the proposed amendments not reflecting the upgraded facilities.

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Coliform Bacteria: The Discharger commented that the proposed coliform bacteria limitations do not reflect the type of recycled water use that the Discharger is currently proposing.

Operation and Maintenance (O&M) Manual: The Discharger requested that the detail in the required O&M manual be eliminated, allowing the Discharger to produce a manual that facilitates the operation of the existing small pond system.

Monitoring and Reporting Requirements: The Discharger commented that (1) effluent monitoring for chlorine residual, sodium, chloride, total nitrogen (TKN), and trihalomethanes (THM), and (2) groundwater monitoring for TKN, THM, boron and metals, should not be required since there are not effluent or groundwater limitations associated with these constituents. The Discharger also commented that any proposed increase in monitoring will significantly increase its WWTP operation costs.

Land Application Monitoring: The Discharger requested that the flow monitoring for the land application area be reduced to a single flow meter. The Discharger believes that information from one flow meter per area is sufficient to provide the required water application information, thus eliminating the unnecessary cost to install, record and compile data from several additional meters.

RESPONSE: Staff concurs that the tentative Resolution modifying WDR Order No. R5-2002-0208 and reducing the permitted wastewater discharge may not be appropriate. Following release of the tentative Resolution for public review, staff met with the Discharger to discuss the proposed amendments and learned of the recent facility improvements and the need to revise the original water balance information. Therefore, the proposed Resolution has been modified to only remove the portions of WDR Order No. R5-2002-0208 that allow a discharge to surface water, thus rescinding the NPDES Permit. Further discharges of wastewater to surface waters are prohibited and all wastewater must be contained on land. The Discharger is preparing an updated water balance to reflect the new and proposed treatment units. The land discharge portions of WDR Order No. R5-2002-0208 will be updated as appropriate, after the updated water balance and facility information is received.