

Central Valley Regional Water Quality Control Board  
30 November/1/2 December 2011 Board Meeting

Response to Comments  
for the  
Sacramento Regional County Sanitation District  
Sacramento Regional Wastewater Treatment Plant  
Tentative Amendment to Waste Discharge Requirements

---

The following are Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative amendment to the Waste Discharge Requirements for NPDES Permit No. CA000077682 (NPDES Permit) and Time Schedule Order R5-2010-0115 for the Sacramento Regional County Sanitation District (Discharger) Sacramento Regional Wastewater Treatment Plant (Facility).

The tentative amended NPDES Permit and Time Schedule was issued for public comment on 15 September 2011 with comments due by 17 October 2011. The Central Valley Water Board received public comments regarding the tentative amended NPDES Permit by the due date from the Discharger. Some changes were made to the tentative NPDES Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

---

**DISCHARGER COMMENTS**

---

**Discharger Comment No. 1. Draft Resolution, Page 4, Item 8**

The last sentence should be corrected as noted to be consistent with the WDR: "Order R5-2010-0114 is modified to include an annual technical report on the water quality for TDS, and EC ~~and standard minerals~~ for the municipal water supply and eliminates the Municipal Water Supply Monitoring in the MRP".

**RESPONSE:** Central Valley Water Board staff concurs. The proposed Order has been changed accordingly.

**Discharger Comment No. 2. Draft Resolution, Page 4, Item 10**

The item should be changed to: "The Discharger does not know why the grab samples ~~are higher and is concerned about violating the annual mass mercury limit~~ demonstrate a systematic bias for higher concentrations but is confident that historic sampling based on 24-hour composites represents the most accurate determination of effluent mercury concentrations. The interim effluent water quality limit based on performance is calculated using the historical composite results for mercury."

**RESPONSE:** Central Valley Water Board staff does not concur. The requested change does not correct or add to the item. Additional evaluation is needed

before Central Valley Water Board is confident there is a systematic bias for higher concentrations with grab samples. Regardless, the mercury mass limit was based on historic 24-hour composite samples and Central Valley Water Board staff recommends using 24-hour composite samples for compliance with the mercury mass limit as described in item 10 of the proposed Order.

**Discharger Comment No. 3. Monitoring and Reporting Program (MRP), Page E-4, III.A.1**

Footnote 2 to Table E-2a Influent Monitoring is requested to be revised as noted in Central Valley Regional Board's letter dated February 22, 2011—"Grab samples to be collected ~~during the calibration and cleaning of~~ whenever the continuous pH meter is offline for 30 minutes or longer."

**RESPONSE:** Central Valley Water Board staff concurs. The Monitoring and Reporting Program has been changed as proposed.

**Discharger Comment No. 4. Factsheet, Page F-115, Municipal Water Supply Annual Report**

The Discharger requests the following change "The Discharger shall submit an annual report characterizing the water supply water quality. The water supply characterization will include data from the water purveyors and other databases. The water supply characterization report will provide a weighted average of groundwater and surface water TDS, and EC standard minerals. ~~The purpose of this monitoring is to evaluate the efficacy of salt minimization plans.~~"

**RESPONSE:** Central Valley Water Board staff partially concurs with the request for consistency with the permit. The proposed Order has been changed as follows: "The water supply characterization report will provide a weighted average of groundwater and surface water TDS and EC." However, the purpose of the monitoring remains as stated "The purpose of this monitoring is to evaluate the efficacy of salt minimization plans."

**Discharger Comment No. 5. Monitoring and Reporting Program, Page E-6, Item IV.A.1.**

The Discharger requests the nitrogenous species (ammonia, nitrate, nitrite and total Kjeldahl Nitrogen) be collected as a composite sample effective 1 December 2020. The Discharger's consultant believes a composite sample properly represents the plant performance whereas a grab sample does not. The composite sampling data will provide more accurate data for designing the treatment components for removing ammonia and nitrates.

**RESPONSE:** Central Valley Water Board staff does not concur. The Discharger requests the nitrogenous measurements (ammonia, nitrate, nitrite and total

Kjeldahl Nitrogen (TKN)) be collected as a composite sample instead of a grab sample effective 1 December 2020, which is when the Discharger is scheduled to complete facility upgrades to comply with effluent limits for ammonia and nitrate. Central Valley Water Board staff does not recommend making the change at this time.

The current permit requires grab samples for the above mentioned nitrogenous measurements, except TKN. This proposed order is changing the TKN monitoring from composite to grab at the request of the Discharger to be consistent with the other nitrogen measurements. If this amendment is approved, all nitrogenous measurements will be grab samples, at the current request of the Discharger. Nitrogenous samples are typically collected as grab samples instead of 24-hour composite samples due to preservation requirements and need for pH and temperature monitoring at the time of collection. The Discharger's additional request to change all the nitrogenous measurements to composite samples in the 2020 permit is premature. It is understood that the Discharger must design its sampling stations with the upcoming upgrade. However, the NPDES permit is renewed every five years, and the collection type for nitrogenous samples for the year 2020 will be considered in the next two permit cycles.