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In Reply Refer To: EOL1212-473

December 6, 2012

Via Fed Ex and Email

Ms. Gayleen Perreira
Regional Water Quality Control Board, Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Re: Comments on Tentative Waste Discharge Requirements for the El Dorado Hills Wastewater Treatment Plant (NPDES No. CA0078671)

Dear Ms. Perreira:

Attached are the El Dorado Irrigation District's (District) comments on the Tentative Waste Discharge Requirements and NPDES permit (Tentative Permit) for the El Dorado Hills Wastewater Treatment Plant (EDHWWTP) issued on November 2, 2012. The comments consist of factual corrections and requests for modified limitations and monitoring requirements, as well as substantial modifications to the ultraviolet (UV) disinfection system operating specifications.

The District is particularly concerned with the prescriptive nature of UV disinfection system operating specifications within the Tentative Permit. The Tentative Permit dictates the manner in which the District must comply with the requirement for disinfection. The specifications are prescriptive and do not allow the District to operate the EDHWWTP in a manner that is both cost-effective and meets the NPDES permit effluent limitations. The District has completed field commissioning and validation testing to determine the appropriate parameters and conditions at which to operate the UV system to achieve equivalency to disinfected tertiary recycled water as prescribed under Title 22 and certifies that the system will be operated and maintained to achieve the required equivalency.

Please contact me at (530) 642-4146 if you have any questions regarding these comments.

Sincerely,

Elizabeth Wells
Engineering Division Manager

EW:jn

Letter No. EOL1212-473
To: Ms. Gayleen Perreira



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Enclosure: Attachment A – Comments on Tentative Permit

cc with enclosure (via email only):

Ken Landau, Central Valley Regional Water Quality Control Board
Diana Messina, Central Valley Regional Water Quality Control Board
Michael Bryan, Robertson-Bryan, Inc.

El Dorado Irrigation District

Tom McKinney, Director of Operations
Brian Mueller, Director of Engineering
Vickie Caulfield, Wastewater/Recycled Water Manager

ATTACHMENT A

EL DORADO IRRIGATION DISTRICT COMMENTS ON TENTATIVE WASTE DISCHARGE REQUIREMENTS FOR THE EL DORADO IRRIGATION DISTRICT EL DORADO HILLS WASTEWATER TREATMENT PLANT EL DORADO COUNTY

Submitted December 6, 2012

I. Effluent Limitations and Discharge Requirements

p. 10, A. Effluent Limitations. The current NPDES permit for the EDHWWTP contains two sets of limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS), one for when Carson Creek provides less than a daily average stream flow-to-effluent dilution of 20:1, and another for when Carson Creek provides a minimum daily average stream flow-to-effluent dilution of 20:1. In addition, the turbidity limitations only apply when dilution is less than 20:1, and alternative total coliform limitations apply when the dilution is at least 20:1. The basis of the 20:1 threshold for more stringent limitations for BOD, TSS, turbidity, and total coliform is California Department of Public Health's (DPH) recommendation that discharges to receiving streams with contact recreation beneficial uses and less than a 20:1 receiving water to effluent dilution ratio be tertiary treated, or equivalent. In its report of waste discharge for renewal of the NPDES permit, the District had requested these limitations be retained in the renewed NPDES permit; however, they are not included in the Tentative Permit. The District renews its request to include the current limitations for BOD, TSS, turbidity, and total coliform in the renewed NPDES permit. These additional limitations for BOD, TSS, turbidity, and total coliform would only apply when 20:1 dilution is provided, and thus would be consistent with DPH recommendations. From an operational point of view, this relief is only needed during significant rain storms when it takes much more energy and labor hours to meet the tertiary limitations which, per DPH recommendations, is not necessary to protect public health when 20:1 or greater dilution is available. If Board staff decide not to grant this request, the District requests that the Fact Sheet be edited to clearly explain why tertiary limitations for BOD, TSS, turbidity, and total coliform must be met to protect beneficial uses when dilution is at least 20:1, despite DPH recommendations not requiring a 7-day median 2.2 MPN/100 mL for total coliform under such conditions. The City of Biggs Wastewater Treatment Plant NPDES permit recently adopted on October 4, 2012 provides alternative, less stringent total coliform limitations when dilution is at least 20:1 (BOD and TSS limitations are less stringent regardless of dilution – e.g., 30 mg/L average monthly).

p. 11, B. Land Discharge Specifications. The reservoir storage capacity is 70 million gallons, not 82 million gallons. Also, the cross-reference in section B.2. to the Fact Sheet should be “section IV.E.2;” not “IV.D.E.2.”

II. Special Provisions

p. 20, VI.C.2.a.i. Toxicity Reduction Evaluation (TRE) Workplan. In the District's current NPDES permits, a TRE Workplan was required to be submitted to the Central Valley Water Board. This TRE Workplan was previously prepared and approved in 2007, and the District continues to operate its WWTP abiding by this Workplan. The District requests the following modification to this section allowing for the resubmission of a prior approved Workplan in order to fulfill the requirements of this provision.

- i. **Toxicity Reduction Evaluation (TRE) Workplan.** Within 90 days of the effective date of this Order, the Discharger shall submit to the Central Valley Water Board a TRE Workplan for approval by the Executive Officer. Resubmission of a prior approved TRE Workplan is an acceptable means of complying with this requirement. The TRE Workplan shall outline the procedures for identifying the source(s) of, and reducing or eliminating effluent toxicity. The TRE Workplan must be developed in accordance with USEPA guidance and be of adequate detail to allow the Discharger to immediately initiate a TRE as required in this Provision.

p. 21/22, a. Turbidity and b. UV Disinfection System Operating Specifications and other related sections. The District requests sections "a. Turbidity" and "b. UV Disinfection System Operating Specifications" be replaced with the following text:

a. Disinfection System Specifications. The Discharger shall operate and maintain the Facility to achieve equivalency to Title 22 disinfected tertiary recycled water as described in Section VI.C.6.a.

b. Filtration System Operating Specifications. To ensure the filtration system is operating properly to provide adequate disinfection of the wastewater, the turbidity of the filter effluent measured at FIL-001 shall not exceed:

- i. 2 NTU, as a daily average;
- ii. 5 NTU, more than 5% of the time within a 24-hour period; and
- iii. 10 NTU, at any time.

In addition, the District requests the following be added to the "Compliance Determination" section (Section VII; Tentative Permit p. 28):

Title 22 Disinfected Tertiary Recycled Water, or Equivalent (Section VI.C.4.a and Section VI.C.6.a). Compliance with the final effluent limitations for total coliform organisms and the turbidity operational requirements shall verify compliance with Special Provisions VI.C.4.a and VI.C.6.a, for equivalency to Title 22 disinfected tertiary recycled water.

In addition, the District requests the Monitoring and Reporting Program be modified to include additional locations as follows:

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Table E-1. Monitoring Station Locations

Discharge Point Name	Monitoring Location Name	Monitoring Location Description
--	<u>FIL-001</u>	<u>Monitoring of the filter effluent to be measured immediately downstream of the filters prior to the UV disinfection system</u>
--	<u>UVS-001</u>	A location where a representative sample of wastewater can be collected immediately before entering the ultraviolet light (UV) disinfection system.
--	<u>UVS-002</u>	<u>Monitoring of the UV system to be measured at a location immediately downstream of the last operating UV disinfection light bank</u>

Concurrent with the modified monitoring locations, the District requests Table E-8 (Ultraviolet Light Disinfection System Monitoring) be replaced with the following table. At a minimum, the District requests that the UV dose footnote #4 in Table E-8 of the Tentative Permit be replaced with footnote #3 below, as this is the only information needed to assess compliance with the specifications.

Table E-8. Ultraviolet Light Disinfection System Monitoring

<u>Parameter</u>	<u>Units</u>	<u>Sample Type</u>	<u>Sample Location</u>	<u>Minimum Sampling Frequency</u>
<u>Flow</u>	<u>MGD</u>	<u>Meter</u>	<u>UVS-001</u>	<u>Continuous</u> ¹
<u>Turbidity</u>	<u>NTU</u>	<u>Meter</u>	<u>FIL-001</u>	<u>Continuous</u> ^{1,2}
<u>Number of UV banks in operation</u>	<u>Number</u>	<u>Observation</u>	<u>not applicable</u>	<u>Continuous</u> ¹
<u>UV Transmittance</u>	<u>Percent (%)</u>	<u>Meter</u>	<u>UVS-001</u>	<u>Continuous</u> ¹
<u>UV Dose</u> ³	<u>mJ/cm²</u>	<u>Calculated</u>	<u>not applicable</u>	<u>Continuous</u> ¹
<u>Total Coliform Organisms</u>	<u>MPN/100 mL</u>	<u>Grab</u>	<u>UVS-002</u>	<u>1/day</u>

¹ For continuous analyzers, the Discharger shall keep records of documented routine meter maintenance activities including date, time of day, and duration, in which the analyzer(s) is not in operation. If analyzer(s) fail to provide continuous monitoring for more than two hours and influent and/or effluent from the disinfection process is not diverted for retreatment, the Discharger shall obtain and report hourly manual and/or grab sample results. The Discharger shall not decrease power settings or reduce the number of UV lamp banks in operation while the continuous analyzers are out of service and water is being disinfected.

² Report daily average and maximum hourly average turbidity.

³ Report daily minimum hourly average UV dose and daily average UV dose. The minimum hourly average dose shall consist of lowest hourly average dose provided in any channel that had at least one bank of lamps operating during the hour interval. For channels that did not operate for the entire hour interval, the dose will be averaged based on the actual operation time.

Finally, related to the above changes, the findings in the Fact Sheet should be modified. In Section VI.E “Other Monitoring Requirements” (Tentative Permit p. F-73), the following should be modified:

2. UV Disinfection System Monitoring

UV system monitoring and reporting are required to ensure that the UV system is operated to achieve the requirements of Section VI.C.6.a. UV Disinfection system monitoring is imposed to demonstrate equivalency to requirements established by DPH, and the National Water Research Institute (NWRI), and American Water Works Association Research Foundation AWWARF's "Ultraviolet Disinfection Guidelines for Drinking Water and Water Reuse."

In Section VII.A Special Provisions, replace subsection 4.a. "Turbidity and UV Disinfection System Operating Specifications" (Tentative Permit p. F-78) with the following:

- a. Disinfection System Specifications.** Section VI.C.6.a of this Order requires that wastewater shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the Department of Public Health (DPH) reclamation criteria, CCR, Title 22, division 4, chapter 3, (Title 22 disinfected tertiary recycled water), or equivalent. The Discharger shall operate the Facility to achieve equivalency to Title 22 disinfected tertiary recycled water as described in Section IV.C.6.a.

Ultraviolet Light (UV) disinfection is used at the Facility. The National Water Research Institute (NWRI) and American Water Works Association Research Foundation NWRI/AWWRF's Ultraviolet Disinfection Guidelines for Drinking Water and Water Reuse" first published in December 2000 and revised as a Third Edition dated August 2012 (NWRI guidelines) includes UV operating specifications for compliance with Title 22. For water recycling in accordance with Title 22, the UV system shall be an approved system included in the Treatment Technology Report for Recycled Water, December 2009 (or a later version, as applicable) published by the DPH.

The beneficial uses of the receiving water include municipal and domestic supply, water contact recreation, and agricultural irrigation supply. The Discharger recycles its wastewater which is governed by the Master Reclamation Permit 97-147. Due to minimal dilution in the receiving water, to protect these beneficial uses, the Central Valley Water Board finds that the wastewater must be disinfected and adequately treated to a level equivalent to Title 22 disinfected tertiary recycled water. As part of the Report of Waste Discharge the Discharger has performed the Field Commissioning Testing and prepared the TM documenting this testing, and certified that the UV disinfection system is properly designed, and is operated and maintained to achieve equivalency to Title 22 disinfected tertiary recycled water described in Section IV.C.6.a.

- b. Filtration System Operating Specifications.** Turbidity is included as an operational specification as an indicator of the effectiveness of the filtration system for providing adequate disinfection. The tertiary treatment process utilized at this Facility is capable of reliably meeting a turbidity limitation of 2 nephelometric turbidity units (NTU) as a daily average. Failure of the treatment system such that virus removal is impaired would normally result in increased particles in the effluent, which result in higher effluent turbidity and could impact UV dosage. Turbidity has a major advantage for monitoring filter performance,

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allowing immediate detection of filter failure and rapid corrective action. The operational specification requires that turbidity prior to disinfection shall not exceed 2 NTU as a daily average; 5 NTU, more than 5 percent of the time within a 24-hour period, and an instantaneous maximum of 10 NTU.

Also in Section VII.A Special Provisions, subsection 6.a. “Other Special Provisions” (Tentative Permit p. F-80) should be modified as follows:

6. Other Special Provisions

- a. Consistent with Order No. R5-2007-0069, this Order requires wastewater to be oxidized, coagulated, filtered, and adequately disinfected pursuant to DPH reclamation criteria, CCR, Title 22, division 4, chapter 3 (Title 22), or equivalent.

The Discharger has certified the Facility has the necessary treatment facilities, and is operated and maintained to provide treatment equivalent to Title 22 Disinfected Tertiary Recycled Water. For the next permit renewal, the Discharger shall re-certify that the Facility provides disinfection equivalent to Title 22 Disinfected Tertiary Recycled Water. The Discharger shall provide this information in its Report of Waste Discharge for permit renewal.

The UV disinfection system specifications in the Tentative Permit are prescriptive in nature, including specifying the dose to be achieved and UV transmittance. Per an August 6, 2012 letter from the Central Valley Clean Water Agency (CVCWA) to the Central Valley Water Board regarding the same UV specifications in the City of Angels Wastewater Treatment Plant Tentative Permit that are included in the EDHWWTP Tentative Permit, these specifications “impermissibly specify the manner of compliance with the Tentative Order’s disinfection requirement.” Below is the relevant excerpt from CVCWA’s comments:

Water Code section 13360 prohibits a discharge permit from specifying the manner in which the permittee must comply with a permit requirement (Tahoe-Sierra Preservation Council v. State Water Resources Control Board (1989) 210 Cal.App.3d 1421, 1438 (Tahoe-Sierra.) In relevant part, this section states:

No waste discharge requirement or other order of a regional board or the state board or decree of a court issued under this division shall specify the design, location, type of construction, or particular manner in which compliance may be had with that requirement, order, or decree, and the person so ordered shall be permitted to comply with the order in any lawful manner. (Wat. Code, §13360(a).)

Water Code section 13360 “preserves the freedom of persons who are subject to a discharge to elect between available strategies to comply with that standard.” (Tahoe-Sierra, supra, 210 Cal.App.3d at 1438.) That is, “[t]he discharger must be allowed to comply with the permit in any lawful manner.” (State Water Board Order WQO 2002-0015¹ at p. 37; see State Water Board Order No. WQ 90-5² at p. 87 [board orders must “allow[] the dischargers to select the manner of

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compliance”]; State Water Board Order No. WQ 83-3³ at p. 4 [Water Code section 13360 “allows the Regional Board to regulate discharges of waste fully, so long as it does not tell the discharger precisely how to meet the established limits.”].)

¹ *State Water Board Order WQO 2002-0015, In the Matter of the Review on Own Motion of Waste Discharge Requirements Order No. 5-01-004 for Vacavilles’ Easterly Wastewater Treatment Plant (Oct. 3, 2002).*

² *State Water Board Order No. WQ 90-5, In the Matter of Petition of Citizens for a Better Environment (CBE), et al. (Oct. 4, 1990).*

³ *State Water Board Order No. WQ 83-3, In the Matter of the Petition of the United States Department of Agriculture, Forest Service of Review of Order No. 6-82-123 (April 21, 1983).*

The EDHWWTP Tentative Permit dictates the manner in which the District must comply with the requirement for disinfection. For example, one criterion states that the District “shall operate the UV disinfection system to provide a minimum UV dose per channel of 100 millijoules per square centimeter (mJ/cm²) at peak daily flow[.]” (Tentative Order p. 22) Another criterion states that “[t]he UV transmittance (at 254 nanometers) in the wastewater exiting the UV disinfection system shall not fall below 55 percent of maximum at any time.” (Tentative Order p. 22) The Tentative Order also contains detailed operational requirements related to quartz sleeves and lamps. (Tentative Order at p. 22) These requirements are prescriptive and do not allow the District to operate the EDHWWTP in a manner that is both cost-effective and meets the prescribed effluent limitations.

The District has completed field commissioning and validation testing to determine the appropriate parameters and conditions at which to operate the UV system to achieve equivalency to disinfected tertiary recycled water as prescribed under Title 22. The District hereby certifies that the system will be operated and maintained to achieve the required equivalency. The results of the testing are documented in *El Dorado Irrigation District, El Dorado Hills Wastewater Treatment Plant UV Validation, Biological Validation of the Ozonia Aquaray® 40HO VLS UV Disinfection System Technical Memorandum, Final*, February 2010 prepared by Carollo Engineers

III. Compliance Determination

p. 29, E. Total Coliform Organisms Effluent Limitations. In the last sentence, “23” should be changed to “2.2.”

p. 29, I. Chronic Whole Effluent Toxicity Limitation. This section inappropriately cross references TIE provisions in Section VI.C.2.a. There are no specific Toxicity Identification Evaluation (TIE) provisions provided in Section VI.C.2.a, which is an appropriate omission. TIE is a tool available during a TRE, the use of which should appropriately be left to the discretion of

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those investigating toxicity under an active TRE. Use of TIEs should be described in the TRE Action Plan; there should be no prescription of their use in the NPDES permit as such a prescription presupposes their utility in a given toxicity situation. The District requests the following modification to this section.

- I. **Chronic Whole Effluent Toxicity Effluent Limitation (Section IV.A.1.d).** Compliance with the accelerated monitoring and TRE/TIE provisions of Provision VI.C.2.a shall constitute compliance with the effluent limitation.

IV. Attachment E – Monitoring and Reporting Program (MRP)

p. E-5, Table E-3. Effluent Monitoring. The MRP contains the requirement to monitor total coliform five days per week. The District requests this monitoring frequency be reduced to three days per week to facilitate a more cost-efficient monitoring program for the District. The District feels this request is justified for the following reasons:

- 1. The EDHWWTP provides a consistent and high level of treatment with respect to total coliform.
- 2. Other automated monitoring parameters designed to control treatment processes and detect potential release of inadequately treated or disinfected effluent provide redundant information to support the EDHWWTP operations and protection of receiving water quality (e.g., automated process control variables, UV lamp operations, and effluent monitoring including pH, turbidity, and dissolved oxygen).
- 3. Some other recent NPDES permits for similar sized facilities have the reduced testing frequency. These permits are summarized below:

Name	Permit Date	Major/Minor	Frequency
Galt (Tert. cloth filt./UV)	Sep. 2010	Major (4.5 mgd)	2/week
Nevada Co. Lake Wildwood (Second. filt./chlorine)	Feb. 2009	Major (1.12 mgd)	3/week
Auburn (Tert. Filt/UV)	Sep. 2010	Major (1.67 mgd)	3/week
Discovery Bay (Secondary filt./UV)	Dec. 2008	Major (2.1 mgd)	2/week
Live Oak (Will be UV, Tert. cloth filt.)	Jun. 2011	Major (1.4 mgd)	2/week
Nevada City (Tert. cloth filt./chlorine)	Jun. 2012	Minor (0.69 mgd)	3/week

The monitoring record since the current NPDES permit became effective shows that the EDHWWTP discharge has always been in compliance with the 7-day median 2.2 MPN/100 mL limitation; the 7-day median has been 2 MPN/100 mL or less. In the figure below, which shows only the detected concentrations, there were weeks when an individual total coliform measurement was greater than 2.2 MPN/100 mL; however, all other measurements within the 7-day period were 2 MPN/100 mL or no non-detect, resulting in compliance with the total coliform limitation. As demonstrated by the data, the EDHWWTP provides a consistent level of treatment with respect to total coliform. Reducing the monitoring of total coliform to three days per week would not measurably or adversely affect monitoring results or compliance.

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p. E-8, V.B.7, Dilutions. As previously defined in Section VI.C.2.a, a TRE is a site-specific study conducted in a stepwise manner with the objective of identifying the source of observed effluent toxicity and identifying effective measures to control the observed toxicity. When triggered, a TRE is broadly guided by an approved TRE Workplan, and specifically guided by the toxicity event specific TRE Action Plan (see Section VI.C.2.a.iv.c). How the TRE is executed should be reserved to the TRE Action Plan, which is prepared with relevant information pertaining to the observed toxicity and recent plant performance. As such, detailing the particular dilution series to be used and how the dilution series is to be prepared during a TRE is inappropriate. The District requests the following modification to Section V.B.7 in the MRP:

7. Dilutions – For regular and accelerated chronic toxicity monitoring, it is not necessary to perform the test using a dilution series. The test may be performed using 100% effluent and two controls. For TRE monitoring, the chronic toxicity testing shall be performed using the dilution series identified in Table E-4, below, unless an alternative dilution series is detailed in the submitted TRE Action Plan. The receiving water control shall be used as the diluent (~~unless the receiving water is toxic~~), unless use of an alternative diluent is detailed in the submitted TRE Action Plan, or when the receiving water is toxic.

p. E-9, V.D.3, TRE Reporting. A TRE Action Plan may recommend a TRE reporting schedule different from that previously detailed in the TRE Workplan. Similar to the discussion concerning dilutions, how the TRE is ultimately executed and progress is reported should be reserved for the TRE Action Plan, which is prepared with relevant information pertaining to the actual toxicity event, rather than in anticipation of a possible future toxicity event, as contemplated in a TRE Workplan. The District requests the following modification to this section.

3. **TRE Reporting**. Reports for TREs shall be submitted in accordance with the schedule contained in the Discharger's approved TRE Workplan, or as amended by the Discharger's TRE Action Plan.

p. E-11, Table E-6. Receiving Water Monitoring Requirements – Fecal Coliform. The MRP requires fecal coliform be monitored once per month. Because the effluent total coliform limitations are substantially lower than the Basin Plan objective (and receiving water limitation) for fecal coliform, the discharge can never cause exceedance of the fecal coliform objective as long as the discharge is in compliance with effluent limitations. The discharge total coliform levels are consistently been very low to non-detect (as discussed above). Therefore, the District requests that the receiving water monitoring requirement for fecal coliform be removed from Table E-6, as was done for the Deer Creek WWTP (Order No. R5-2008-0173). Other dischargers with no fecal coliform monitoring requirement include City of Placerville's Hangtown Creek Water Reclamation Facility, City of Roseville's Dry Creek and Pleasant Grove WWTPs, City of Vacaville's Easterly WWTP, City of Galt WWTP and Reclamation Facility, Nevada County's Lake Wildwood WWTP, and Nevada City's WWTP.

p. E-19, D. Other Reports, item #4. This section regarding reporting of sanitary sewer overflows should be deleted, or revised to state that operation of the District's wastewater collection system is permitted under Order 2006-0003-DWQ, Statewide General Waste Discharge Requirements

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(WDRs) for Sanitary Sewer Systems, and reporting of sanitary sewer overflows shall be subject that that order's requirements. This item currently states that the "Sanitary sewer overflows are prohibited by this Order. All violations must be reported as required in Standard Provisions." As written, a sanitary sewer overflow would be a violation of the NPDES permit and associated civil fines and attorney fees can be accessed through third party lawsuits.

V. Attachment F – Fact Sheet

p. F-10, E.1.a. 82 Million Gallon Reservoir. The reservoir storage capacity is 70 million gallons, not 82 million gallons.

p. F-73, E.3 Pond Monitoring. The Monitoring and Reporting Program does not require pond monitoring. As stated in the report of waste discharge, one pond was removed and the remaining two ponds are concrete-lined. The District requests item E.3 regarding pond monitoring be removed from the Fact Sheet to be consistent with the rest of the Tentative Permit.

p. F-73, E.4 Effluent and Receiving Water Characterization. The following edit is required to maintain consistency with Attachment I requirements, which requires monitoring every other month.

The Discharger is required to conduct ~~monthly~~ monitoring of the effluent at Monitoring Location EFF-001 and of the receiving water at Monitoring Location RSW-001 during the 3rd or 4th year of this permit term for all priority pollutants and other constituents of concern as described in Attachment I.

VI. Attachment I – Effluent and Receiving Water Characterization Study

p. I-1, II.C. Sample type. This section states that all effluent samples shall be taken as a composite sample. However, composite sample collection is not appropriate for all sample analyses due to analytical hold time requirements and nature of the constituent to be analyzed. Grab samples are more appropriate for volatile organic compound analysis, because the compounds will volatilize during the 24-hour period. Grab samples are also more appropriate for bis(2-ethylhexyl)phthalate analysis, because of the known sample contamination that can occur from sampling apparatus tubing. Sulfite has a short hold time requirement and is more appropriately collected as a grab sampled. Therefore, the District requests the following modification to this section.

C. Sample type. All effluent samples shall be taken as 24-hour flow proportioned composite samples, unless not appropriate to meet analytical holding time requirements per 40 CFR 136. Samples for bis(2-ethylhexyl)phthalate analysis shall be collected as a grab sample, due to the potential for sample contamination from composite sampler tubing. The effluent sample collection type and rationale shall be defined in the study work plan. All receiving water samples shall be taken as grab samples.