

LATE REVISIONS – 14 March 2008

**Item 7 City of Merced, Wastewater Treatment Facility, Merced County –
Consideration of Renewal of NPDES Permit and Rescission of Cease and Desist
Order**

Deletions in ~~strikeout~~. Additions in **bold underline**.

LIMITATIONS AND DISCHARGE REQUIREMENTS

Page 8 Modify the last sentence in first paragraph of Finding K as follows:

The Regional Water Board will consider the merits of each case in determining whether it is appropriate to include a compliance schedule in a permit, and, consistent with the Basin Plan, should consider feasibility of achieving compliance, and must impose a schedule that is as short as ~~practicable~~ **possible** to achieve compliance with the objectives, criteria, or effluent limit based on the objective or criteria.

Page 14 -15 Make the following modifications to Effluent Limitations Section IV.A.3:

3. Interim Effluent Limitations Non-CTR Constituents Discharge Points 001 and 002

From ~~<Permit Effective Date >~~ and ending on the dates **included below** of the completion of Phase 1 improvements (Phase 2 with respect to Nitrate+Nitrite limits)(see Provision IV.C.2), but not to exceed ~~<5 years from Permit Adoption Date>~~, the Discharger shall maintain compliance with the following limitations at Discharge 001 and 002, with compliance measured at Monitoring Location M-001, as described in the attached MRP. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters in Subsection 1 above.

a. Interim Effluent Limitations specified in Table 8.

Table 8. Interim Effluent Limitations

Parameter	Units	Effluent Limitations			<u>End Date</u>
		Average Monthly	Average Weekly	Maximum Daily	
Biochemical Oxygen Demand, 5-day @ 20°C	mg/L	30	45	90	<u>17 May 2010</u>
	lbs/day	2877	4316	8632	
Total Suspended Solids	mg/L	30	45	90	<u>17 May 2010</u>
	lbs/day	2877	4316	8632	
Settleable Solids	mL/L	0.2	--	1.0	<u>17 May 2010</u>
Aluminum	ug/L			2986	<u>30 Nov 2011</u>
Iron	ug/L			3420	
Nitrite + Nitrate (as N)	mg/L			54	<u><5 years from adoption date></u>

- b. **Percent Removal:** The average monthly percent removal of BOD 5-day 20°C and total suspended solids shall not be less than 85 percent. **(Ending 17 May 2010)**
- c. **Total Coliform Organisms:** Effluent total coliform organisms concentrations shall not exceed the following:
 - i. 23 MPN/100 mL as a seven-day median; and
 - ii. 240 MPN/100 mL as a daily maximum **(Ending 17 May 2010).**

Page 16 -17 Make the following modifications to Effluent Limitations Section IV.B.2.b:

2. Interim Discharge Specifications WMA Discharge Point 003

- b. From **<Permit Effective Date >** and ending on the dates **specified below** of completion of Phase 1 improvements (~~Phase 2 with respect to Nitrate+Nitrite limits~~)(see Provision IV.C.2), but not to exceed **<5 years from Permit Adoption Date>**, the Discharger shall maintain compliance with the following limitations at Discharge 003, with compliance measured at Monitoring Location M-001, as described in the attached MRP. These interim effluent limitations shall apply in lieu of the corresponding final effluent limitations specified for the same parameters in Subsection 1, above.

Table 11. Interim Discharge Specifications WMA:

Parameter	Units	Maximum Daily	End Date
Aluminum	ug/L	2986	<u>30 Nov 2011</u>
Nitrate+Nitrite (as N)	mg/L	54	<u><5 years from adoption date></u>

Page 29 Revise the first sentence of Provisions Section VI.C.2., as follows:

WWTF Expansion. The Discharger shall complete Phase 1 improvements **as soon as practicable possible**, but by no later than **(5 years from Order adoption date)**.

Page 41 Make the following changes the Provisions Section VI.C.7.b. compliance schedule table for Nitrate + Nitrite.

<u>Task</u>	<u>Compliance Date</u>
Complete construction of proposed denitrification treatment units.	As soon as practicable, but n Not to exceed < 4 years, 9 months of the adoption date of this Order>
Full Compliance	As soon as practicable, but n Not to exceed <5 years from adoption of Order.>

Page 41- 42 Make the following changes the Provisions Section VI.C.7.c., compliance schedule table for Biosolids/Sludge Handling Modifications.

<u>Task</u>	<u>Compliance Date</u>
i. Complete construction/modification of proposed units.	As soon as practicable, but n Not to exceed <4 years 9 months years from adoption of Order.>
ii. Full Compliance	As soon as practicable, but n Not to exceed <5 years from adoption of Order.>

Page 42 Make the following changes the Provisions Section VI.C.7.d., compliance schedule table for Tertiary Treatment.

<u>Task</u>	<u>Compliance Date</u>
i. Complete construction of proposed units.	As soon as practicable, but n Not to exceed <5 years from adoption of Order <u>18-May 2010</u> .>
ii. Full Compliance	As soon as possible practicable, but not to exceed <5 years from adoption of Order 18 May 2010>

Page 42-43 Make the following changes the Provisions Section VI.C.7.e., compliance schedule table for Aluminum and Iron.

<u>Task</u>	<u>Compliance Date</u>
i. Submit a work plan and time schedule to propose compliance measures.	By (120 days after the effective date of Order)
ii. Implement approved work plan.	Within 60 days of Executive Officer approval of work plan.
iv. Full Compliance	As soon as practicable, but n Not to exceed <5 years from adoption of Order.> <u>30 November 2011.</u>

MONITORING AND REPORTING PROGRAM

Page E-17 Revise the tenth row of, *Table E-11. Reporting Requirements for Special Provisions Progress Reports*, as follows:

Compliance Schedule for Biosolids/Sludge Handling Modifications (VI.C.7.c.)	1 February, <u>1 August, semi-annually</u>
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FACT SHEET

Page F-47 Revise the language in Section VII.B.7.a., *Cyanide, Dibromochloromethane, and Dichlorobromomethane – Compliance Schedule*, as follows:

...final effluent limits for these constituents to become effective on **18 May 2010**. **A compliance schedule is appropriate for cyanide, dibromochloromethane, and dichlorobromomethane because these are new limitations and the WWTF must be upgraded to meet the new limitations. To meet final effluent limitations for these constituents, the Discharger has to complete the bid process and construct necessary treatment units that will include at minimum tertiary treatment units and new UV disinfection units. The Discharger’s engineer has provided a schedule that demonstrates the soonest the Discharger can possibly comply is 17 May 2010.** As the compliance schedule is greater than one year, this Order requires the Discharger to submit semi-annual progress reports until it achieves compliance with the final limitations. **These progress reports are interim requirements that will allow the Regional Water Board to evaluate the Discharger’s progress towards completing the planned project.**

Page F-47 Revise the language in Section VII.B.7.b., *Compliance Schedule Nitrate + Nitrite*, as follows:

...of treatment by as soon as possible practicable, but by no later than the end of the permit term. **A compliance schedule is appropriate for nitrate+nitrite because it is a new limitation and the WWTF must be upgraded to meet the new limitation. The Discharger has included in its proposed WWTF upgrades implementation of the Symbio™ process (nitrification/denitrification). Modeling performed by the Discharger's consultant indicates that with this process, the WWTF effluent should be able to meet the proposed effluent nitrite-nitrate limitations at the time of permit adoption and after each expansion, however, compliance is not certain. Should the Symbio™ process prove to be incapable of reliably producing an effluent that consistently complies with the final effluent limits for nitrate + nitrite, the Discharger has committed to construct separate denitrification basins. The Discharger's engineering consultant has provided a schedule that indicates that to secure funding and to complete design, bid, and construction of these units would take approximately five years, thus the soonest date by which the Discharger could possibly ensure compliance would be approximately five years from the adoption date of the Order. As the compliance schedule is greater than one year, this Order requires the Discharger to submit annual progress reports until it achieves compliance with the final limitations. These progress reports are interim requirements that will allow the Regional Water Board to evaluate the Discharger's progress towards completing the planned project**

Page F-48 Revise the language in Section VII.B.7.c., *Compliance Schedule for Biosolids/Sludge Handling Modifications* as follows:

...This Order includes a time schedule that requires the Discharger to complete these modifications ~~as soon as practicable, but~~ prior to the expiration of the term of this permit. **A compliance schedule is appropriate for modifications to the Biosolids/Sludge Handling Units as the Discharger will have to construct new treatment units. The Discharger's engineering consultant has provided a schedule that indicates that to secure funding and to complete design, bid, and construction of these modifications will take approximately five years, thus the soonest date by which the Discharger could possibly ensure compliance would be approximately five years from the adoption date of the Order. As the compliance schedule is greater than one year, this Order requires the Discharger to submit semi-annual progress reports until it achieves compliance with the final limitations. These progress reports are interim requirements that will allow the Regional Water Board to evaluate the Discharger's progress towards completing the planned project.**

Page F-48 Revise Section VII.B.7.d., *Compliance Schedule for Tertiary Treatment* as follows:

...adequately disinfected as defined by Title 22 CCR, Division 4, Chapter 3, or equivalent as soon as practicable, but by no later than the end of the permit term. A compliance schedule is appropriate for tertiary BOD, TSS, SS, coliform, turbidity, and removal efficiency limitations because they are new limitations and the WWTF must be upgraded to meet the new limitations. To meet final effluent limits for these constituents, the Discharger has to complete the bid process and construct necessary treatment units that will include at minimum tertiary treatment units. The Discharger's engineer has provided a schedule that demonstrates the soonest the Discharger can possibly comply is 17 May 2010. As the compliance schedule is greater than one year, this Order requires the Discharger to submit annual progress reports until it achieves compliance with the final limitations. These progress reports are interim requirements that will allow the Regional Water Board to evaluate the Discharger's progress towards completing the planned project.

Page F-48 Revise Section VII.B.7.e., *Compliance Schedule for Aluminum and Iron* as follows:

...The permit includes a compliance schedule that requires the Discharger to complete measures to ensure compliance with the final aluminum and iron Effluent Limitations and Discharge Specifications as soon as practicable but no later than the end of the permit term. A compliance schedule is appropriate for aluminum and iron because they are new limitations and the WWTF must be upgraded to meet the new limitations. To meet final effluent limits for these constituents, the Discharger has to complete the bid process and construct necessary treatment units that will include at minimum tertiary treatment units. The Discharger's engineer has indicated that the WWTF effluent should meet the proposed aluminum and iron limitations once tertiary treatment units are completed. This, however, is not certain. If the WWTF does not meet aluminum and iron limitations with the Discharger will have to study and select an appropriate couagulent to aid in achieving compliance. The Discharger's engineer has provided a schedule that indicates to properly study and select appropriate seasonal couagulents would take 18 months. Thus the earliest the Discharger can ensure compliance is 30 November 2011. As the compliance schedule is greater than one year, this Order requires the Discharger to submit annual progress reports until it achieves compliance with the final limitations. These progress reports are interim requirements that will allow the Regional Water Board to evaluate the Discharger's progress towards completing the planned project.