



CVCWA Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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Via Electronic Mail Only

Alexander Mushegan
Senior Engineer
Central Valley Regional Water Quality Control Board
1685 E Street
Fresno, CA 93706
Alexander.Mushegan@waterboards.ca.gov
centralvalleyfresno@waterboards.ca.gov

Re: Comments on Cities of Fresno and Clovis Regional Wastewater Reclamation Facility

Dear Mr. Mushegan:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to comment on the tentative Waste Discharge Requirements for the Cities of Fresno and Clovis Regional Wastewater Reclamation Facility, Fresno County (Tentative Order). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this letter, we provide the following comments regarding the requirements that Fresno replace all monitoring wells that have gone dry, Discharge Specification D.1, electrical conductivity (EC) objectives and limitations, and ultraviolet (UV) disinfection dosing specifications.

A. Replacing Every Dry Groundwater Monitoring Well Is Overly Burdensome

Findings 43 and 44 on pages 11-12 of the Tentative Order recognize that due to groundwater elevation reductions, some of the facility's groundwater wells have dried up. These findings also note that the decreasing groundwater table and other land uses in the vicinity impact groundwater quality, which means that the City of Fresno needs to evaluate whether its existing monitoring well network is effectively characterizing the effect of Regional Wastewater Reclamation Facility (Facility) discharges on groundwater quality. On page 40 of the Tentative Order, in provision J.1.b, the Tentative Order requires that Fresno develop a work plan to "evaluate[] the current monitoring network and propose[] new monitoring wells to replace existing wells that have gone dry. . . ." This requirement may be

unnecessarily burdensome to complete. Water Code section 13267 authorizes the Regional Board to require monitoring and reporting, but only when the burden, including costs, of the reporting bears a reasonable relationship to the need for the report. (Wat. Code, § 13267(b)(1).) CVCWA does not dispute the Central Valley Regional Water Quality Control Board's (Regional Board) finding that 20 of the 49 total monitoring wells at the Facility are functioning and that the remainder have gone dry. However, provision J.1.b appears to require that the City of Fresno replace all 29 dry wells.

Adequate groundwater monitoring may be able to be achieved without installing 29 new wells, but through the installation of far fewer that are placed more thoughtfully. For instance, collective monitoring efforts may be possible through the implementation of the CV-SALTS program. The Tentative Order does not explain why each and every dry well should be replaced, nor does it explain why fewer, strategically-placed wells would not satisfy the Regional Board's monitoring needs. Therefore, CVCWA requests that provision J.1.b be revised to clarify that replacement monitoring wells need only be installed as necessary to adequately monitor groundwater quality.

Related to groundwater monitoring, the proposed Monitoring and Reporting Program (MRP) for the Tentative Order requires the quarterly submission of field logs for each well alongside other quarterly monitoring reports. These field logs can be quite long and very laborious to submit to the Regional Board. If the Regional Board does not need to review these field logs on a regular basis, CVCWA recommends that this requirement be revised to make field logs available on request of the Regional Board.

B. Discharge Specification D.1 Is Duplicative and Should Be Removed

Discharge Specification D.1 prohibits the release, discharge, or placement of waste constituents such that they will cause a violation of the Groundwater Limitations. (Tentative Order, p. 30.) This provision is duplicative of the Groundwater Limitations themselves, which already specify that discharges from the Facility may not cause or contribute to exceedances of specified limitations. (Tentative Order, p. 34.) Because Discharge Specification D.1. is duplicative, it is not necessary. Accordingly, CVCWA requests that Discharge Specification D.1 be removed from the Tentative Order.

C. The Tentative Should Refer to Accurate EC Objectives and Should Clarify the Future EC Limits

On page 18 of Tentative Order, the discussion regarding EC objectives should be revised to use a more accurately describe the source of objectives. Specifically, footnote 6 to the table on page 18 states that the low EC objective is 700 $\mu\text{mhos/cm}$ based on a secondary maximum contaminant level (MCL). This is incorrect. The secondary MCL for EC is 900 $\mu\text{mhos/cm}$ on the low end and 1,600 $\mu\text{mhos/cm}$ on the high end. The Tentative should be revised to reflect the correct secondary MCL figures for EC. Similarly, incorrect EC objectives are listed in Finding 68.a. on page 18. CVCWA proposes the following revision to correctly reference the secondary MCL for EC and total dissolved solids: "The average electrical conductivity and total dissolved solids concentration in the shallow upgradient groundwater monitoring wells exceed the respective recommended secondary MCLs (500 mg/L for total dissolved solids ~~and or~~ 900 $\mu\text{mhos/cm}$ for electrical conductivity)."

The Tentative Order states that ten years after the adoption of the permit, the EC limit will be the "limit specified in the current revision of the Basin Plan." This is unclear – does "current" refer to the Basin Plan that is current when the Tentative Order is adopted, or to the Basin Plan in place ten years from the adoption date? This provision also creates potential conflicts with the CV-SALTS program, which may suspend salinity limitations set forth in the Basin Plan for certain dischargers. CVCWA requests that the Tentative Order be revised to clarify which version of the Basin Plan to which the Regional Board

intends to refer. The Tentative Order should also explicitly note that the implementation of the CV-SALTS program may affect the EC limitations set forth in any future Basin Plan.

D. UV Dose Requirements Should Provide Operational Flexibility

On pages 32 and 33 of the Tentative Order, the requirements for operating the Facility's UV disinfection system are set forth in great detail, including the equation to be used in determining compliance with Division of Drinking Water (DDW) specifications. While CVCWA understands the need for the permit to refer to the proper dose calculation, we are concerned that setting forth the equation within the permit would restrict necessary flexibility for future modifications. This is because the dose calculation could not be modified without re-opening the permit. Therefore, CVCWA requests that the permit simply refer to dose calculation equations as approved by the DDW for the Facility and remove the recital of the specific equation. Alternatively, the equation can be moved to the findings section, which will provide the necessary flexibility.

We appreciate your consideration of these comments. If you have any questions, or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eofficer@cvcwa.org.

Sincerely,



Debbie Webster,
Executive Officer