



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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ED CROUSE – TREASURER, RANCHO MURIETA CSD

February 28, 2013

Via Electronic Mail

Mr. Dale Harvey
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706
dharvey@waterboards.ca.gov

Re: Comments on the Tentative Waste Discharge Requirements for the City of Tulare Wastewater Treatment Facility

Dear Mr. Harvey:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative Waste Discharge Requirements and Master Recycling Permit (Tentative Order) for the City of Tulare Wastewater Treatment Facility (Tulare WWTF). CVCWA is a non-profit organization that represents more than 50 publicly owned treatment works throughout the Central Valley Region in regulatory matters affecting surface water discharge, land application, and water reuse. We approach these matters with a perspective to balance environmental and economic interests consistent with state and federal law.

CVCWA has comments regarding three topics contained within the Tentative Order. Those topics are:

- Effluent Limits for Total Nitrogen
- Groundwater Objectives for Sodium
- Monitoring Well Requirements

Our comments on each of these topics are provided below.

I. Effluent Limits for Total Nitrogen

The Tentative Order proposes to establish an effluent limit for Total Nitrogen of 13 mg/l based on a groundwater quality objective for nitrate of 10 mg/l as N and a presumed level of attenuation of nitrogen in the soils underlying the WWTF's unlined storage and percolation ponds. We request that the permit be modified to allow the City flexibility to either (a) meet the proposed final effluent limit for Total N or (b) meet a higher effluent limit in the event the City can demonstrate, through a technical analysis, that a higher concentration of Total N can be allowed that will not cause underlying groundwater to contain nitrate in concentrations exceeding 10 mg/l.

2. Groundwater Limit for Sodium

The Tentative Order proposes a performance based groundwater limit for sodium of 110 mg/l or natural background quality, whichever is greater, effective until April 11, 2018. After April 2018, the Order states that the City must comply with a sodium groundwater limit of 69 mg/l unless a revised limit is adopted that is consistent with the recommendations of the Central Valley Salinity Alternatives for Long Term Sustainability (CV-SALTS). Given the timing of a proposed CV-SALTS Basin Plan amendment (currently projected to occur in the 2017 time frame), the uncertainty of a sodium groundwater objective in that Basin Plan amendment, and the time involved for a separate Tulare Basin Plan amendment to adopt a numeric sodium groundwater objective, the proposed April 2018 time frame is inadequate.

The permit acknowledges that there are no numeric standards in the Basin Plan for sodium to protect the agricultural supply use. The 69 mg/l limit was established as an interpretation of a narrative objective in the 2002 permit, and is acknowledged in the Information Sheet (page 7) to be highly conservative under most conditions.

CVCWA requests that the permit language in Provision 26 be changed to extend the time frame for the sodium groundwater limit to April 2021, and to add a provision whereby the City can develop site specific technical information using recommendations from CV-SALTS or other sources, to support a re-interpretation of the applicable narrative objective at a value different from the 69 mg/l limit that was established in 2002. Additionally, the permit should allow replacement of the sodium limit with another indicator of salt, if appropriate.

3. Monitoring Well requirements

The Tentative Order requires the City to provide a monitoring well work plan by 30 September 2013 that proposes adding new wells to its existing monitoring network. That

existing network includes a total of 29 wells that have been required in previous permits. The cost of monitoring well construction is a significant local expense which should be closely considered. CVCWA requests that language be added to the proposed permit (Provision 20) which states "The Regional Board recognizes the expense associated with monitoring well construction and will work with the City to optimize well location and construction to yield a cost-effective monitoring network configuration."

We appreciate your consideration of these comments and our requested revision. Please contact me at (530) 268-1338 or officer@cvcwa.org if I can be of further assistance.

Sincerely,



Debbie Webster,
Executive Officer

cc: Pamela Creedon, Central Valley Regional Water Quality Control Board
(Via Electronic Mail: pcreedon@waterboards.ca.gov)