

**TESTIMONY REGARDING  
PROPOSED ORDER ON THE  
CITY OF LODI  
WASTE DISCHARGE REQUIREMENTS  
AND  
MASTER RECLAMATION PERMIT  
SWRCB OCC FILE NO. A-1886**





# Presenters

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# Site Characterization

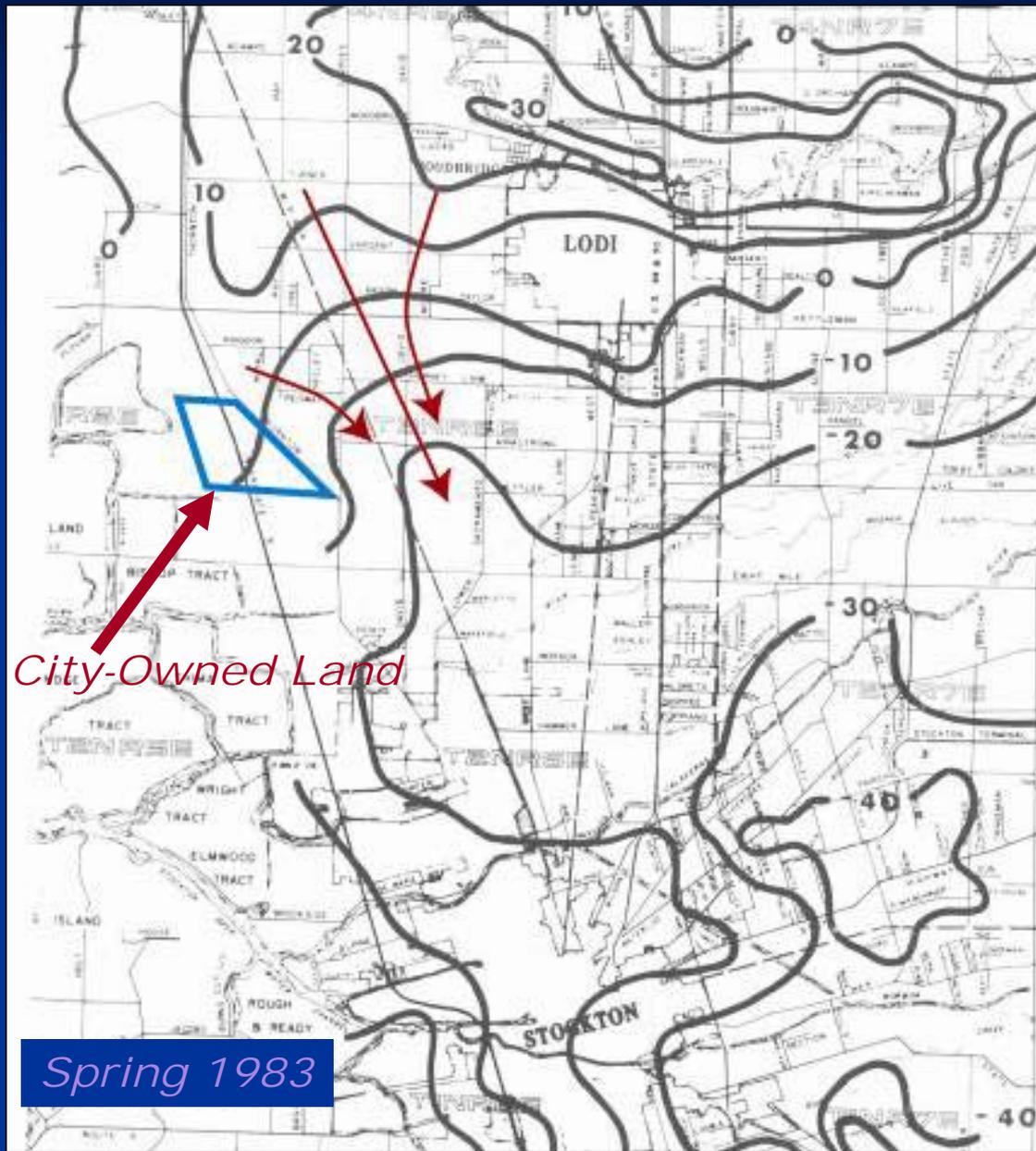
The Proposed Order reflects inadequate consideration of the regional and site-specific factors that complicate the characterization of groundwater conditions.

# Major Technical Inaccuracies

Groundwater mounding associated with the effluent storage ponds is overstated.

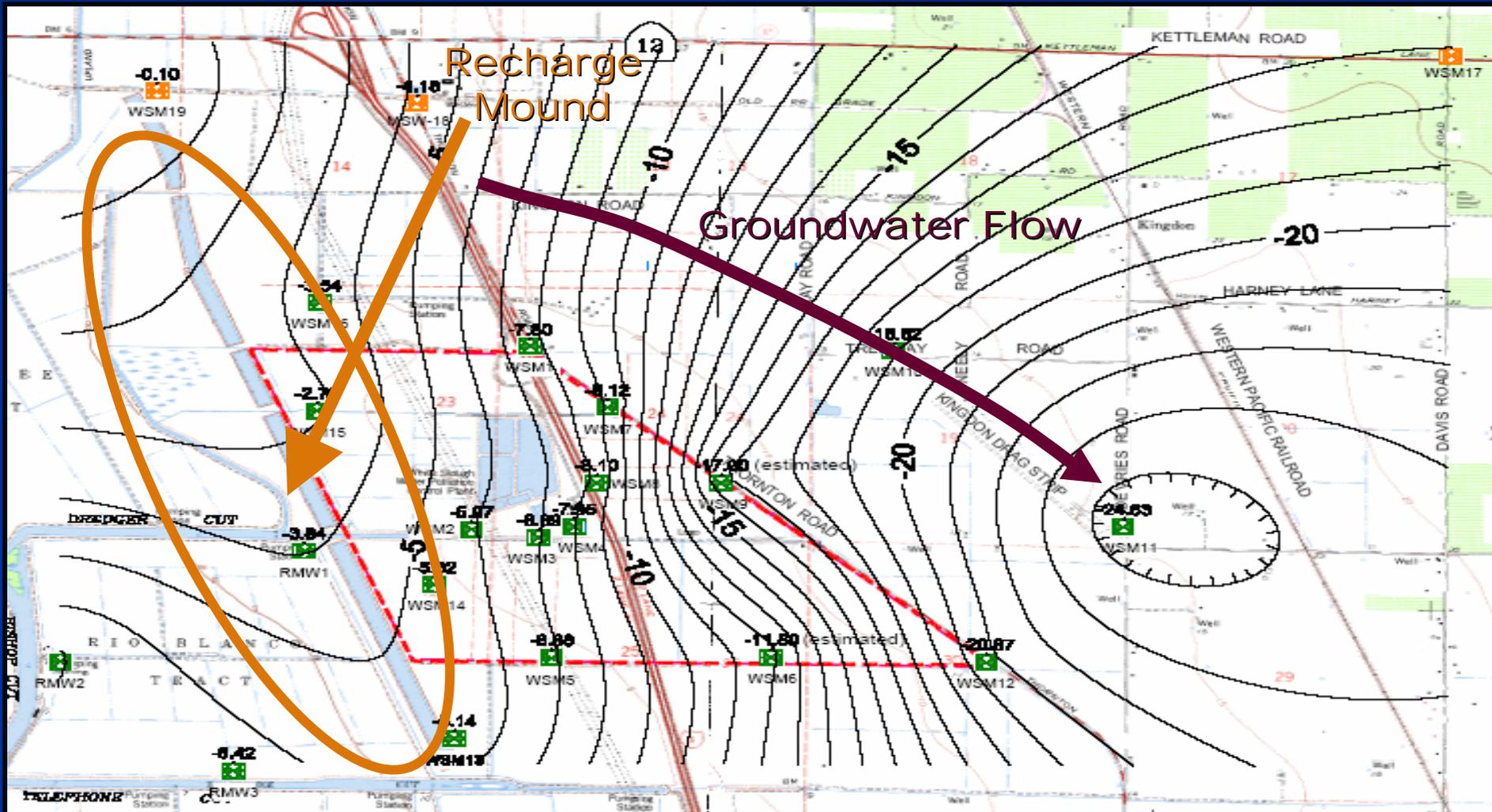
The relationship between the mounding and the observed historical maximum nitrate and EC concentrations is overstated.

# Regional Groundwater Gradient



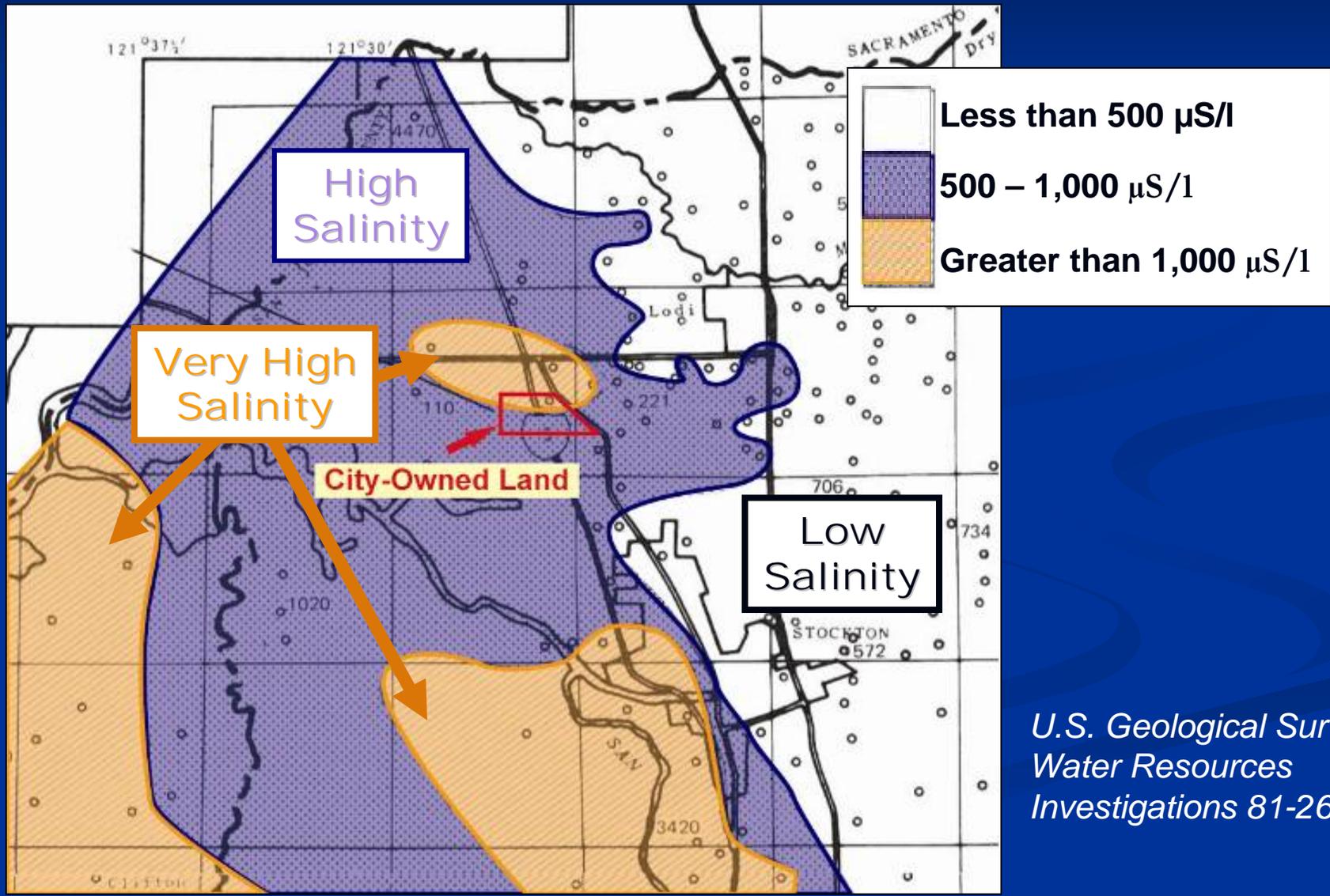
Spring 1983

# Groundwater Elevation Contours





# Regional EC Trends (Measured in Supply Wells)



U.S. Geological Survey  
Water Resources  
Investigations 81-26, 1981

# Summary and Conclusions From Groundwater Studies

Groundwater is Strongly Influenced by  
Incompletely Characterized Regional  
Conditions.

Further Investigation is Needed To Confirm  
Background Concentrations.  
(Current Permit Requirement)

# Recommendation

- Reject the Proposed Order
- In the Alternative:
  - Delete Footnote 17
  - Modify Conclusion 4 as follows:

**“Evidence in the record indicates that releases of wastewater from the City’s unlined storage ponds may have caused contributed to ~~the underlying groundwater to contain~~ nitrate and EC levels in the underlying groundwater that exceed Basin Plan objectives.”**