

<b>TENTATIVE WDR COMMENTS, April 17, 2012, City of Oakdale</b>		
1	Table in Page 3, Paragraph 14; Page 5, Paragraph 23	Ammonia → Ammonia–nitrogen
2	Page 3, paragraph 19	Sludge for the feed to the screw presses will be pumped directly from the RAS line to the screw presses as this provides a more consistent sludge feed rather than storing it first in the sludge storage tank.
3	Page 4, Paragraph 20.a	The headworks provides both screening and degritting for the raw sewage.
4	Page 4, Paragraph 21. h	See comment 2. The sludge drying beds <u>may</u> be used in summer for sludge drying or additional sludge drying depending on costs.
5	Page 5, paragraph 23	The Parkson WaveOx nitrogen removal system was not placed into full operation and monitored until later in 2011. Plant effluent nitrate has been typically about 7.0 mg/l since October 2011 to the present. The City intends to take every reasonable step to minimize nitrate in the plant effluent using the WaveOx system, but has no direct control over nitrate in the groundwater.
6	Page 7, Paragraph 36	The orchard to the North of the plant is walnuts. Surrounding land is primarily agricultural with some residences on the bluff to the North and the City to the South across the Stanislaus River.
7	Page 9, Paragraph 42	The City takes exception to this paragraph as they only have control of the plant effluent with regard to these constituents. See following paragraphs.
8	Page 9, Paragraph 43	The City takes exception to this paragraph as they only have control of the plant effluent with regard to these constituents. The City will continue to monitor plant effluent TDS and chloride. The TDS is typical for municipal wastewater considering the water supply TDS. The City plans no plant changes that would increase the effluent TDS. The City will monitor plant effluent chloride in order to detect if it does increase above past levels so action can be taken if needed.

<b>TENTATIVE WDR COMMENTS, April 17, 2012, City of Oakdale</b>		
9	Page 9, Paragraph 45	The City takes exception to this paragraph as they only have control of the plant effluent with regard to these constituents. The treatment plant is not designed to reduce arsenic and manganese as these constituents are near zero in the City water supply and very low in the treatment plant effluent. The City will monitor these constituents in the treatment plant effluent to assure they remain low. The City has no control over these constituents in the groundwater.
10	Page 12, Paragraph 56.b.	See comment 4.
11	Page 13, 56C	It is not clear if “disinfect all monitoring wells to ensure the monitoring wells have not been colonized with coli form organisms” is a one-time disinfection for re-initial well operation or routing disinfection while the well is in use? Total Coliform Organisms (TCO) data in Paragraph 40. Table (based on the average of data from 2003 to 2010) are unlikely representative the current condition. All monitoring well data have been relatively free of TCP since 2007 (except for a spike occurring in August 2010).
12	Page 13, Paragraph 56.d	The City takes exception to this paragraph. Manganese and arsenic are both near undetectable limits in the City’s well water supply and there are no known dischargers of manganese or arsenic to the wastewater treatment plant. Sludge has not been discharged to any of the percolation ponds in several years and current plant effluent turbidity averages about 0.5 NTU or less. The City has control of certain water quality aspects of the discharge such as pH and suspended solids, but little else that might impact arsenic and manganese in the groundwater. The plant upgrades will have little or no impact on these two constituents in the groundwater and the City has no control of these constituents in the groundwater.
13	Page 13, Paragraph 57	The City takes exception to this paragraph. The industrial wastewater, while high in BOD and TDS mass loading, is a small percentage of the total plant loading. There have been no treatment process upsets or “sludge bypasses” since the Hershey operation was closed. The plant has been treating all

**TENTATIVE WDR COMMENTS, April 17, 2012, City of Oakdale**

		raw sewage flows with no issues since the Hershey closing. The City position is that a pretreatment program is not justified at this time, it is more economical and reliable for all parties to treat this waste at the treatment plant and that it is the City responsibility to receive adequate revenue from the discharger to cover the costs of treatment of this industrial waste at the treatment plant.
14	Page 14, Paragraph 61	The method of closure of Ponds 3, 6 and 7 will be developed in the closure plan with positive means to prevent discharge into those ponds.
15	Page 16 and 17	Paragraphs 66 and 70 appear to be the same
16	Page 19, Paragraph C.1	It is not clear whether or not "Total Nitrogen" is calculated as the sum of two constituents (i.e., nitrate and ammonia) listed in this document. In fact, Total Nitrogen (TN) is the sum of nitrate-nitrogen (NO <sub>3</sub> -N), nitrite-nitrogen (NO <sub>2</sub> -N), ammonia-nitrogen (NH <sub>3</sub> -N) and organically bonded nitrogen. The sum of nitrate-nitrogen and ammonia-nitrogen is 20 mg/L (based on current average effluent nitrate-nitrogen of 11.3 mg N/L and ammonia-nitrogen of 0.7 mg N/L). TN is then calculated as 20 mg N/L plus nitrite-nitrogen and organic-nitrogen (i.e., >20 mg N/L). An average TN of 20 mg N/L may not be applied.
17	Page 21, Paragraph E.9	It is not clear which ponds are being referenced. The only ponds that contain standing water are the aeration basins. The DO in the top foot of the aeration basins is greater than 1.0 mg/l except possibly in the oxygen depleted zones used for nitrogen removal.
18	Page 23, Paragraph F.3	The City takes exception to the paragraph as they are not reusing the effluent. There are four cloth filters for pretreatment of the secondary effluent prior to UV disinfection. Typically there are two cloth filters in reserve except under peak flow conditions. If two filters were out of service at peak flow conditions, it is possible the plant effluent could have a UV transmittance less than 55% and there is no alternative except to discharge this effluent to the percolation ponds.