



February 26, 2013

Mr. Dale Harvey
California Regional Water Quality Control Board
1685 "E" Street, Suite 100
Fresno, CA 03706

Subject: Comments on Tentative Waste Discharge Requirements (WDR) and
Monitoring and Reporting Program (MRP) for City of Tulare Wastewater
Treatment Facility, Tulare County

Dear Mr. Harvey:

I have reviewed the tentative Waste Discharge Requirements (WDR) and Monitoring Reporting Program (MRP) for the City of Tulare, issued on January 29, 2013, and request the following changes:

I. Requested Changes to the tentative WDR:

Finding 9, Page 2: Add the following sentence to the end of this paragraph. "The design firm responsible for the existing 6-mgd design, Carollo Engineers, Inc., asserts that the nitrogen removal in the winter months is related to the mixed liquor suspended solids concentration. The January and February 2012 excursions above the 10 mg/L TN concentration occurred when the MLSS was 102% and 108% of the annual average MLSS. Data for December 2012 and January 2013 show the domestic effluent TN to be below 10 mg/L with the MLSS increased to 113% and 112% of the annual average to compensate for the colder weather. Therefore, an increase in the MLSS to above 112% of the annual average would keep the plant below 10 mg/L TN. Increasing the MLSS in cold months is a common practice at activated sludge plants."

Finding 60, page 11: The last two sentences of this finding do not correctly summarize the significant industrial users (SIUs) discharging to the industrial and domestic wastewater treatment plants. In order to correct the record, please change the last two sentences to read, "The SIUs connected to the Industrial Plant that are not dairy processors include Ruiz Food Service (food processing) and a food transportation company with truck washout operations. Four SIUs discharge to the Domestic Plant, including food transportation companies with truck washout operations, and Corpak, Inc. (cardboard manufacturing)."

II. Requested Changes to the tentative MRP:

Domestic Plant Influent Monitoring, page 3: Because the frequency of pH monitoring is specified to be "daily," the pH sample type should be changed from "meter" to "grab."

Commingled Effluent Monitoring, page 4: Delete continuous flow metering requirement. There is currently no effluent flow meter. There is no diversion of effluent upstream of the commingled effluent mixing box. There is no storage of wastewater within either treatment plant, and the hydraulic residence times in either plant are short enough that any loss of volume through evaporation is insignificant. For these reasons, the effluent flow would not differ from the influent flow. Installation of a new effluent meter does not provide any added value, especially since flows delivered to each participating farmer in the irrigation program are already metered.

Delete requirement to monitor for Fixed Dissolved Solids (FDS). Monitoring for TDS is more appropriate. FDS is typically monitored when there is a concern about the organic content of the wastewater, such as with discharges from food processors or dairies. POTW effluents, including Tulare's, are typically well oxidized and have a low organic content.

Use Area Monitoring, page 6: In the second paragraph, first line, insert the words, "receiving recycled water" after the word "Areas." There is no need to inspect use areas if they are not taking water.

Groundwater Monitoring, page 6: For all of the constituents listed to be monitored "Quarterly"³ change the frequency to "Semi-annually" (during the first and third quarters) for the existing monitoring wells. For future wells, the requirement as it is now written (Quarterly³) which will require quarterly for 12 successive quarters, then a reduction to semiannually thereafter, is acceptable. We have been monitoring the current wells quarterly for 10 to 15 years now (40 to 60 consecutive quarters). While I appreciate the Regional Board allowing the reduction to semiannually monitoring after 12 more quarters, given that we already have 40 to 60 quarters of sampling data, I see no reason why we need to start anew with 12 more quarters. Our current groundwater monitoring cost is \$112,000 per year. Reducing the frequency to semi-annually for the current wells will cut our annual monitoring costs in half.

Use Area Reporting, page 11:

Delete "FDS" in Item 1. This item appears to come from the land discharge requirements for food processors and dairies, who discharge process wastewater that can have a high component of organic TDS. The salinity and the organic content of the commingled effluent are low: The EC of the commingled effluent is well below the Basin Plan limit of "source + 500," the biological treatment processes remove organic salts, and the BOD₅ concentrations are around 11 mg/L or less. Monitoring FDS uptakes for the crops does not provide any added value for Tulare's reclamation program, where the effluent organic concentration is very low.

Delete Item 4 (monitoring daily and average BOD loading rates). This item is appropriate for dairy and food processing permits but is not necessary here, where the WWTP effluent has a low organic content. Irrigation with municipal effluent is not subject to the food processing land application guidelines and the additional tracking of this loading rate does not provide any added benefit to Tulare's reclamation program, where the effluent organic concentration is very low.

Delete Item 6 (FDS loading rates). Again, the commingled effluent EC is well below the Basin Plan limit, the treatment processes remove organic salts, and quantifying the FDS loading to the Use Areas is not necessary. Tracking of this loading rate will require additional laboratory fees, and staff time for recordkeeping, and does not provide any added benefit to Tulare's reclamation program.

I respectfully request your consideration and acceptance of the above comments. If you have any questions, please call me.

Sincerely,

A handwritten signature in blue ink that reads "L. R. Nelson". The signature is written in a cursive style with a large, stylized initial "L".

Lewis R. Nelson, P.E.
Tulare Public Works Director