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August 19, 2013

Via e-mail (mail Original)
James.Marshall@waterboards.ca.gov

Mr. Jim Marshall
Senior Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

NPDES Permit No. CA0079243

Subject: Comments on Attachment 1 to the Tentative Order Amending Order R5-2007-0113, Waste Discharge Requirements and Master Reclamation Permit for the City of Lodi White Slough Water Pollution Control Facility

Dear Mr. Marshall:

Thank you for providing the opportunity to review and submit comments on the Tentative Order Amending Waste Discharge Requirements Order R5-2007-0113 (Tentative Order) for land discharge from and other reuse operations for the City of Lodi (City) White Slough Water Pollution Control Facility (WPCF). Your July 19, 2013 Notice of Public Hearing for the Tentative Order requested submittal of City comments on the Tentative Order to the Central Valley Regional Water Quality Control Board (Regional Board) by August 19, 2013. The City appreciates the time and effort you and your staff have devoted to developing the Tentative Order.

Regarding the Tentative Order, the City has several concerns that are detailed in Attachment A, a comment document prepared by West Yost Associates on behalf of the City. Some of the most significant concerns are summarized as follows:

- **Revise Discussion and Requirements for Title 27 Exemption.** The findings and conclusions presented in the Tentative Order with respect to applicable WPCF Title 27 exemptions do not fully incorporate the findings and conclusions presented in State Water Resources Control Board Order WQ 2009-0005, as amended by Order WQ 2012-0001 (Order WQ 2012-0001). In addition, the Tentative Order does not fully consider the technical information that the City has provided with respect to existing operations and their ability to ensure that discharges from the WPCF comply with the Basin Plan groundwater objectives.

The City's concerns with and requests for revisions to the Title 27 discussion are numerous and involved.

- **Revise Discussion and Requirements for BPTCs.** The findings and conclusions presented in the Tentative Order with respect to BPTCs should also be modified. Specifically, because the Effluent Storage Ponds are not a source of groundwater degradation at the WPCF site, this facility does not need to be evaluated through a BPTC assessment. In addition, the City requests that the compliance date for implementing BPTCs for manganese impacts associated with the Agricultural Fields be extended to the year 2023.
- **Revise Groundwater Limitations.** The Tentative Order includes a specific list of constituents for the Groundwater Limitations. However, the inclusion of the specific list is not appropriate for several of the constituents, including the fact that many of the values identified are based on agricultural goals, which need to be determined on a site-specific basis.

If you have any questions regarding the City's comments, please do not hesitate to contact Kathryn Garcia of my staff at (209) 333-6800 x2091 or Kathryn Gies of West Yost Associates at (925) 461-6795.

Sincerely,



Larry Parlin
Deputy Public Works Director – Utilities

LP/KG/myn

Enclosures: Attachment A - Comments on Attachment 1 to the Tentative Order

West Yost Associates Technical Memorandum: Nitrate and Manganese Groundwater Quality Impacts Associated with Wastewater Releases from the Effluent Storage Ponds at the City of Lodi White Slough Water Pollution Control Facility

cc: Kathryn Gies, West Yost Associates, Walnut Creek (no enclosure)