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October 21, 2013

Ms. Gayleen Perreira
California Regional Water Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

Subject: Comments on City of Jackson Tentative Orders

Dear Ms. Perreira:

The purpose of this letter is to provide the Regional Water Board with comments on the City of Jackson WWTP Tentative Order, the Order amending Time Schedule Order R5-2011-0909, and Time Schedule Order R5-2011-0909-01. We appreciate you and your staff working closely with the City in drafting these Orders. The following comments are provided for your consideration:

Tentative Order

- Turbidity Receiving Water Limitation – The City's current order allows the use of a 1-month averaging period when determining compliance with the receiving water limitations on turbidity. The Tentative Order does not include this language. The City requests that a 1-month averaging period be allowed in the Tentative Order for determining compliance with receiving water turbidity limitations. Alternatively, the City would like to know the justification for removing this language.
- Numeric Receiving Water Limitations – It is specified that the receiving water temperature limitation is based on monitoring locations RSW-001 and RSW-002. For consistency, specific points and means of assessing compliance with all numeric receiving water limitations should be stated.
- The Tentative Order contains effluent limitations, continuous monitoring, and reporting for effluent total residual chlorine. Now that the City is moving forward with the implementation of UV light disinfection, in lieu of chlorine disinfection, the City requests that the Tentative Order

contain a note stating that these requirements related to total residual chlorine will no longer be required upon completion and operation of the new UV light disinfection system. The City may utilize chlorine for cleaning of process equipment, or as an emergency backup to the UV system. In this case, the City requests that the requirement for monitoring and reporting only be effective when activities involving chlorine are undertaken.

The City has no comments on the Order amending Time Schedule Order R5-2011-0909 or on Time Schedule Order R5-2011-0909-01.

Thank you for considering the foregoing comments. Please do not hesitate to contact me with any questions you might have regarding the contents of this submittal.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Daly", with a long horizontal flourish extending to the right.

Michael Daly
City Manager

cc: Eric Neuschmid, Chief Plant Operator
Dave Price, Stantec Consulting Services