

**To:** Kozelka, Peter  
**Subject:** RE: Tentative Lincoln WWTRF Order - minor comments

---

**From:** Kozelka, Peter [mailto:Kozelka.Peter@epa.gov]  
**Sent:** Thursday, December 19, 2013 1:09 PM  
**To:** Taylor, Brian@Waterboards  
**Cc:** Perreira, Gayleen@Waterboards; Sablad, Elizabeth@epamail.epa.gov  
**Subject:** RE: Tentative Lincoln WWTRF Order - minor comments

I have reviewed the tentative order and accompanying factsheet and submit the following minor comments.

**Biosolids:**

- A. Throughout the permit, use the term “sewage sludge”, not “biosolids”. Lincoln currently does not treat the sewage sludge by digestion or other methods to achieve the minimum pathogen and vector attraction reduction requirements for some use or disposal practices, so does not meet the common definition of the term “biosolids”. Currently the only options for it are landfilling in a municipal landfill (which they are currently doing), or sending to another treatment facility such as a composter for further treatment.
- B. The fact sheet (facility description section) should include a description of facility’s current handling methods, i.e. that the sludge currently is not treated but is dewatered and sent to a municipal landfill.

**Pretreatment program:**

The regionalization of this permit expands discharge volume of 5 MGD, therefore we expect the permit to include requirements for discharger to develop a pretreatment program.

**Factsheet clarifications:**

Backsliding for Cu (pg. F-47) – We acknowledge the backsliding and removal of Cu effluent limits. However please include sentence/discussion describing rationale – the WER study has influenced the RPA analysis and conclusion.

Historical data for mercury in Table F-3 – The RPA section for mercury includes relevant monitoring data including maximum effluent concentration etc. Please include revise/update this info into Table F-3, which appears to have omitted such numeric values.

*respectfully,*  
Peter Kozelka, Ph.D.  
Water Division, NPDES permits  
EPA Region 9  
San Francisco, CA 94105

phone (415) 972-3448  
415-947-3545 fax

---

**From:** Taylor, Brian@Waterboards [<mailto:Brian.Taylor@waterboards.ca.gov>]  
**Sent:** Wednesday, November 27, 2013 8:45 AM  
**To:** Kozelka, Peter; [eofficer@cvcwa.org](mailto:eofficer@cvcwa.org); [rmchenry1403@aol.com](mailto:rmchenry1403@aol.com)  
**Subject:** Tentative Lincoln WWTRF Order

Hello;

The Tentative Order, renewing the discharge permit for Lincoln WWTRF is attached for your review.  
Comments are due no later than 26 December 2013.

Brian Taylor P.G  
Sacramento NPDES Permitting  
Central Valley Regional Water Quality Control Board  
11020 Sun Denter Drive  
Rancho Cordova, Ca. 95670  
(916) 464-4662