

**Regional Water Quality Control Board  
Central Valley Region  
Board Meeting – 5/6 June 2014**

**Responses to Written Comments for the  
City of Visalia  
Water Conservation Plant  
Tulare County  
Tentative Waste Discharge Requirements/NPDES Permit  
and  
Tentative Time Schedule Order**

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At a public hearing scheduled for 5/6 June 2014, the Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) will consider adoption of Waste Discharge Requirements (WDRs) (NPDES No. CA0079189) and a Time Schedule Order (TSO) for the City of Visalia, Water Conservation Plant. The final meeting agenda will be available at: [http://www.waterboards.ca.gov/centralvalley/board\\_info/meetings/#2014](http://www.waterboards.ca.gov/centralvalley/board_info/meetings/#2014) at least ten days before the meeting. The agenda will provide the date the proposed WDRs/NPDES permit and TSO will be heard, indicate the anticipated order of agenda items, and may include staff revisions to the proposed WDRs/NPDES permit and TSO.

This document contains responses to written comments received from interested parties regarding the tentative WDRs/NPDES permit and TSO circulated on 17 March 2014. Written comments from interested parties were required by public notice to be submitted to the Central Valley Water Board by 5:00 pm on 18 April 2014 to receive full consideration. Written comments were received by 18 April 2014 from:

- City of Visalia (Discharger), 14 April 2014

Written comments from the above interested party are summarized below, followed by the response of the Central Valley Water Board staff. Based on the comments, changes were made to the proposed WDRs/NPDES permit. Central Valley Water Board staff also made changes to the proposed WDRs/NPDES permit and proposed TSO to correct typographical errors and to improve clarity.

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**DISCHARGER COMMENTS**

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**DISCHARGER COMMENT 1:** The Discharger indicates it will be unable to comply with the requirement to report the rolling 12-month average EC of the water supply, as it currently does not receive monthly data from the private water supply company. The Discharger requests the requirement be postponed 12 months.

**RESPONSE:** The requested change has been made. The proposed Order requires the Discharger to compare the effluent EC to the annual water supply EC for the first 12 months of the permit term.

**DISCHARGER COMMENT 2:** The Discharger requests Attachment E – Monitoring and Reporting Program, Table E-12, be updated to require general minerals in the water supply be reported as an average, not a flow-weighted average. The Discharger indicates the private water supply company does not report flow-weighted averages for general minerals, and the Discharger is unsure whether the private water supply company will provide sample results from the more than 70 individual supply wells necessary for the Discharger to calculate a flow-weighted average.

**RESPONSE:** The requested change has been made.

**DISCHARGER COMMENT 3:** The Discharger requests that Groundwater Limitations V.B.1.a. and V.B.1.b. be updated to include language that indicates any release of waste constituents from the wastewater treatment facility that causes groundwater to be above the limitations are considered violations, as opposed to any release that causes groundwater to be at or above limitations.

**RESPONSE:** The requested change for Groundwater Limitation V.B.1.b. has been made but the requested change for Groundwater Limitation V.B.1.a. was not made. The groundwater limitations are based on the water quality objective in the Tulare Lake Basin Plan. The Tulare Lake Basin Plan at Section III, page III-7 includes a water quality objective for bacteria, which states that “total coliform organisms... shall be less than 2.2/100 mL.” Staff interprets the objective as not allowing total coliform organisms to be detected in ground water at or above the objective.

Staff changed Groundwater Limitation V.B.1.b. based on the language in Section III of the Tulare Lake Basin Plan under the Chemical Constituents objective, which states that “waters designated MUN shall not contain concentrations of chemical constituents in excess of the maximum contaminant levels (MCLs) specified in... Title 22 of the California Code of Regulations.”

**DISCHARGER COMMENT 4:** The Discharger requests the name of the Facility be updated in the Fact Sheet, Table F-1 to reflect the correct name.

**RESPONSE:** The requested change has been made.