



36311 LASSEN AVE / P.O. BOX 339 HURON, CALIFORNIA 93234 • (559) 945-2241 • FAX (559) 945-2609

September 15, 2014

Dale Harvey, Senior Engineer
Central Valley Regional Water Quality Control Board
1685 E. Street
Fresno, CA 93706

Re: Tentative Waste Discharge Requirements

Mr. Harvey,

After reviewing the Tentative Permit the City of Huron Staff has the following comments.

The effluent requirements of 40/80 for DOD & TSS are reasonable, though the City will have to purchase a composite sampler.

The groundwater chloride level MCL is 175 mg/l. The Waste Water Treatment Plants (WWTP) effluent has been at 160 mg/l which is at 91% of the MCL, a greater margin would be desirable.

Section E on page 16 a. (i) states, Nitrate (as N) shall not exceed 10 mg/l. However, there are some concerns about the Nitrate limit of 10 mg/l. Even though the Information Sheet states the WWTP's effluent average nitrate level is at 0.2 mg/l; Westland Water District groundwater data from 29 wells within three miles of the WWTP, show average nitrate levels of 16 mg/l. There could be a chance water from these sources could influence the levels of nitrate of the WWTP groundwater, though it does state on page 7 the first encountered groundwater has low levels of nitrate.

Section E on page 16 a. (ii) states, Title 22, the MCLs quantified therein. City Staff is not sure if this means the results have to be listed, or if the MCL cannot be exceeded. If the MCL results cannot be exceeded, an initial laboratory analysis should be completed to see what the results are. There have been some cases where the WWTP effluent would pass limitations, but the groundwater didn't. The groundwater could be affected by outside sources. In order to meet Title 22 requirements, a WWTP upgrade to tertiary treatment might be required.

Section E on page 16 b. states, total Coliform Organisms over any 7 day period \geq 2.2 MPN/100 ML cannot be exceeded. At this time the WWTP does not disinfect the effluent and does not check for coliform bacteria. In the event of effluent reuse, this would be addressed at that time. With the low chlorine residual limitations, an ultraviolet system would be best for future disinfection.

On page 17, Provision 16, discuss the disposal of 8,900 tons of biosolids. The biosolids have been removed. The City requests this provision to be dropped before the permit is implemented.

This concluded our comments in regards to the Tentative WDR.

Sincerely,



Jack Castro
Huron Finance Director

Cc: Oscar M. Ramirez, City Engineer
Dan DeMoss, Field Specialist
Dennis Longhoffer, City of Huron Public Works