

Central Valley Regional Water Quality Control Board  
16/17 April 2015 Board Meeting

Response to Comments  
for the  
City of Manteca and Dutra Farms, Inc.  
Wastewater Quality Control Facility  
Tentative Waste Discharge Requirements

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The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit No. CA0081558) renewal for the City of Manteca and Dutra Farms, Inc. (Discharger) Wastewater Quality Control Facility (Facility).

The tentative NPDES Permit was issued for a 30-day public comment period on 28 January 2015 with comments due by 2 March 2015. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from the Discharger, the Central Valley Clean Water Association (CVCWA), and the Neighbors United. Some changes were made to the proposed Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

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## **DISCHARGER COMMENTS**

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### **Discharger Comment 1. Ammonia Interim Limit.**

The Discharger requests an interim limit for ammonia. This request is based on the justification for a compliance schedule provided in the infeasibility analysis submitted on 20 January 2015. The Discharger request an interim average monthly limit of 1.1 mg/L. The current final average monthly limit is 0.94 mg/L.

**RESPONSE:** Central Valley Water Board staff concurs that an interim ammonia effluent limit should have been included in the tentative Permit. However, after initially proposing final ammonia effluent limits based on USEPA's 2013 recommended ammonia criteria, Central Valley Water Board staff had reason to question the applicability of these criteria. Board staff are now proposing that the Board set final effluent limits based USEPA's 1999 recommended ammonia criteria while the Board evaluates an appropriate methodology to implement USEPA's 2013 criteria. The Facility can comply with the revised ammonia effluent limits, and therefore a compliance schedule and an interim effluent limit are no longer needed.

### **Discharger Comment 2. Total Dissolved Solids Limits for Irrigation Water.**

The Discharger requests removal of the Total Dissolved Solids (TDS) effluent limit to recycled water applied to irrigation areas in LND-001. The Discharger comments that this effluent limit is not necessary since the proposed permit also includes effluent and groundwater limitations for electrical conductivity (EC) and TDS.

**RESPONSE:** During the agricultural season (about late April through early October), the Discharger irrigates agricultural fields with food processing wastewater from Eckert Cold Storage that is blended with undisinfected secondary treated municipal effluent. The Discharger's available groundwater monitoring data indicate that downgradient groundwater

concentrations for salinity constituents (e.g. EC and TDS) are elevated above background levels in some areas within the Facility. The increase in the concentration of these constituents in groundwater must be consistent with the Antidegradation Policy (Resolution No. 68-16). Specifically, the Antidegradation requires that, "Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in the best practicable treatment or control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained."

The Discharger has made several improvements to reduce impacts to groundwater. In June 2003, the Discharger ceased applying biosolids to the Land Application Areas and now hauls the biosolids to an offsite landfill. The Discharger also supplemented its drinking water supply with lower salinity surface water in August 2005, and added nitrification-denitrification facilities in July 2006 to its treatment system to reduce total nitrogen. The Discharger also requires Eckert Cold Storage to minimize salinity discharges to the Facility (e.g., pollutant minimization plan). The salinity concentrations of the irrigation water are currently lower than the downgradient groundwater and the site-specific water quality objectives. It is expected that over time the groundwater concentrations should improve. However, an overall improvement in down-gradient groundwater quality in conjunction with improvement in effluent quality with respect to salts has not occurred. This may be due to continued leaching of accumulated salts in the unsaturated zone that are masking effects of improved effluent quality in downgradient wells.

The Discharger submitted a BPTC evaluation in October 2012 that demonstrated the operational changes and Facility upgrades comply with the Antidegradation Policy based on the current TDS loadings. The performance-based TDS limit for the wastewater applied to the fields was included in the Tentative permit to ensure the salinity of the wastewater will not increase over the current levels and results in the continued implementation of BPTC in accordance with the Antidegradation Policy. However, since the TDS levels in the irrigation water are considerably less than the site-specific water quality objectives, as an alternative to an effluent limit, the proposed permit has been modified to include this requirement as a trigger concentration. If the trigger is exceeded the Discharger would be required to conduct an evaluation to determine the reason(s) for the increased TDS concentrations. The evaluation would include an explanation of the increased concentrations and a determination if it represents an increase in mass loading of TDS to the Land Application Areas that would require an Antidegradation Analysis update, including additional BPTC evaluations, to demonstrate the increased mass loading is consistent with the Antidegradation Policy.

Furthermore, the TDS trigger was recalculated to consider statistical variability. The 95<sup>th</sup> percentile annual average TDS concentration was calculated, resulting in a TDS trigger of 600 mg/L.

### **Discharger Comment 3. Manganese Groundwater Study.**

The Discharger requests removal of the Manganese Groundwater Study. The Discharger's rationale for this request includes the following:

- 1) Manganese concentration levels in the effluent are much lower than those found in the groundwater.
- 2) The Discharger has monitored manganese in the previous permit and after completion of the Reasonable Potential Analysis, manganese was removed from the 2009 NPDES permit.
- 3) High manganese groundwater concentration levels are naturally occurring in the area. The Discharger has a drinking water well with a manganese removal system (well 14 with a raw water average of 54 µg/L). Oakwood Lake Water District, which is directly south of Manteca, has two wells with manganese removal systems and the average for the wells was 111 µg/L and 78 µg/L, respectively. Also, City of Lathrop, which is north of Manteca, in February of 2014 had a maximum concentration of 350 µg/L in well 21. This well also has a manganese removal system.

**RESPONSE:** Central Valley Water Board staff concurs. The Manganese Groundwater Study requirement has been removed from the proposed Permit. The wastewater being applied to the land application areas (LAAs) is low in manganese and the 5-day biochemical oxygen demand (BOD<sub>5</sub>) loading is not at levels that would result in reducing conditions that can mobilize metals in the soil. Based on the evaluation of the low wastewater manganese concentrations, the low BOD<sub>5</sub> concentrations of the irrigation water applied into the land application areas, field average irrigation cycle (about 10 days), shallow groundwater, and long-term regional agricultural practices, staff determined that the difference in dissolved manganese concentrations among the downgradient wells is due to spatial and temporal variability. Similar groundwater characteristics in terms of spatial and temporal variability for manganese have also been observed and evaluated in the City of Lathrop, which is north of Manteca and the Oakwood Lake Water District, which is directly south of Manteca. Therefore, it is not appropriate to determine whether the discharge has caused degradation by a simple well-by-well comparison to a background value. The Discharger is required to continue implementing best management practices, which includes, but is not limited to, maintaining an irrigation system that allows even distribution of the BOD<sub>5</sub> loading into the LAAs to ensure the land application practices do not contribute to the elevated manganese.

#### **Discharger Comment 4. Monitoring and Reporting Requirements**

The Discharger requests six changes to the Monitoring and Reporting requirement, attachment E, of the proposed Permit.

**RESPONSE:** Central Valley Water Board staff reviewed and provided responses to the Discharger's suggested changes as follows:

- 1) Laboratory Analysis Sheets – Section X.B.c pg. E-23.

In this section the Discharger is required to “include all laboratory analysis sheets, including quality assurance/quality control information, with all its SMR's for which sample analyses were performed.”

**Comment:** The Discharger requests to eliminate this requirement because it would be resource intensive for the Discharger to provide both the in-house and contract laboratory analysis.

**Response:** The requirement to submit laboratory analysis sheets is intended for the contract laboratory analysis and not for in-house analysis. The reason this information is required at the same time as the SMRs is because often times throughout the development of the permit renewal process or when evaluating compliance, Central Valley Water Board staff needs to quickly be able to confirm the sample integrity of a particular analysis. Contract laboratories regularly provide the laboratory sheets in an electronic format to the Discharger and it is not onerous to upload the documents with the self-monitoring reports (SMR's). The requirement in the proposed Permit in section X.B.6.c of the Monitoring and Reporting Program has been clarified such that only laboratory sheets are required when sample analysis is conducted by contract laboratories, as shown in underline/strikeout format below:

- c. The Discharger shall attach all laboratory analysis sheets, including quality assurance/quality control information, with all its SMR's for which sample analyses were performed by contract laboratories.

2) Daily Flow Measurements to Each Check in Each LAA Field - Section X.D.6.a.ii pg E-29.

In this section the Discharger, on a monthly basis, is required to "tabulate daily flow measurements from each wastewater source and supplemental irrigation water to each check in each LAA field."

**Comment:** The Discharger request to modify this requirement because to report irrigation flow to each check of each land application area (LAA) field would be very labor intensive and time consuming for the farmer operating the fields as well as for the City staff. There are about 10 LAA fields and every field has an average of 10 to 15 checks, with exception of the smaller fields that usually have between 4 to 5 checks. The Discharger suggested modifying this requirement to "record daily flow from each wastewater source and supplemental irrigation water to each LAA field."

**Response:** Central Valley Water Board staff concurs with the Discharger's suggested changes. This requirement has been modified in the proposed Permit.

3) Site Plan of irrigation Checks for Each LAA - Section X.D.6.a.v pg. E-29.

In this section the Discharger is required to provide with the Monthly Monitoring Reports "A current site plan depicting the irrigation checks within each LAA field that will be used during the calendar year, including all water conveyance ditches and internal berms that divide each LAA (where applicable)."

**Comment:** The Discharger request that this information be reported on an annual basis as part of the Nutrient Management Plan because the site plan will not change from month to month.

**Response:** Central Valley Water Board staff concurs with the Discharger's suggested changes. This requirement has been modified in the proposed Permit.

4) Cropping Information for Each LAA Field - Section X.D.6.a.vi pg. E-29.

In this section the Discharger is required, on a monthly basis, to “Tabulate cropping information for each LAA field that includes at least: a) The crop that will be grown in each field; b) Planned and actual planting dates; c) Planned and actual harvest dates; d) Typical maximum expected and actual yield at harvest in applicable crop units per acre; e) Crop total nitrogen demand; and f) Crop average evapotranspiration rate in inches.”

**Comment:** The Discharger request that this information be reported on an annual basis as part of the Nutrient Management Plan because this information will be available at the end of the irrigation season after harvest.

**Response:** Central Valley Water Board staff concurs and the proposed Permit has been modified accordingly.

5) Summary of Historical and Current Groundwater Elevations - Section X.D.6.b.iv pg E-30.

In this section the Discharger is required to provide with the Quarterly Monitoring Reports “Summary data tables of historical and current groundwater elevations.”

**Comment:** The Discharger request clarification of the term “historical” in terms of the range expected. The Discharger recommends five years as an appropriate time range.

**Response:** Central Valley Water Board staff concurs with the Discharger’s suggested changes and has modified the proposed Permit accordingly.

6) Nutrient Management Plan Due Date - Section X.D.6.d pg. E-30.

**Comment:** The Discharger request a change in the due date for the Nutrient Management Plan annual report from February 1<sup>st</sup> to March 1<sup>st</sup>.

**Response:** Central Valley Water Board staff concurs with the Discharger’s suggested changes and has modified the proposed Permit accordingly.

### **Discharger Comment 5. Minor Comments and edits**

The Discharger requests 3 minor changes and editorial changes to the proposed Permit. Two were suggested specifically to the Limitations and Discharge Specifications and one to the MRP Section (attachment E).

**RESPONSE:** Central Valley Water Board staff reviewed and provided responses to the Discharger’s suggested changes as follows:

1) M<sub>x</sub> Unit Conversion Factor - Mass of nitrogen Applied to LAA – Section IV.B.2. (pg. 7)

**Comment:** The Discharger comments that the conversion factor M<sub>x</sub> in the nitrogen loading equation is unnecessary because the factor 8.345 is already included in the equation

**Response:** There was an error in the tentative permit regarding the description of the  $M_x$  variable in the Nitrogen Loading equation. The tentative permit defined the  $M_x$  variable as a "Unit conversion factor." However, the correct definition of the variable is the nitrogen mass from other sources (e.g. fertilizer and compost) in pounds. The proposed Permit has been corrected as shown below:

### Nitrogen Loading Equation

$$M = \sum_{i=1}^{12} \frac{(8.345(C_i V_i) + M_x)}{A}$$

Where M = Mass of nitrogen applied to LAA in lb/ac/yr;

$C_i$  = ~~monthly~~ Monthly average concentration of total nitrogen month  $i$  in mg/L;

$V_i$  = Volume of wastewater applied to the LAA during calendar month  $i$  in millions gallons;

$i$  = the number of the month (i.e., January = 1, February = 2, etc.);

~~$n = 12$~~ ; and

$A$  = ~~the a~~Area of the LAA or field irrigated in acres;

~~8.345 = Unit conversion factor to transform mg/L to lbs/million gallons; and~~

~~$M_x$  = Unit conversion factor~~ Nitrogen mass from other sources (e.g. fertilizer and compost) in pounds.

2) Site Specific Groundwater Limitations for EC Table 6 - Section V.B.1.a (pg. 12).

In the tentative permit footnote 3 reads as follows:

“The water quality objectives for electrical conductivity and total dissolved solids are to be determine based on the site specific study performed by the discharger, as required in Section Vi.C.2.c.”

**Comment:** The Discharger is proposing the following change to footnote 3:

“The water quality objectives for electrical conductivity and total dissolved solids are to be determine based on the site specific study performed by the discharger, as required in Section Vi.C.2.c. in October 2012”

**Response:** Central Valley Water Board staff concurs with the Discharger’s suggested changes and has modified the proposed Permit accordingly.

3) Analytical Methods Report – Section X.D.3 (pg. E-25)

“Within 60 days of permit adoption, the Discharger is required to submit a report outlining reporting levels (RL’s), method detection limits (MDL’s), and analytical methods for the constituents listed in tables E-2, E-3, E-5, E-6, E-7, E-8, E-9, and E-10.”

**Comment:** The Discharger comments that the requirement to include information on constituents in Table E-6 as part of the analytical methods report is incorrect, since Table E-6 includes calculated land application requirements.

**Response:** Central Valley Water Board staff concurs with the Discharger’s suggested changes and has modified the proposed Permit accordingly.

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## CVCWA COMMENTS

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### CVCWA Comment I. Interim Effluent Limitations for Ammonia.

CVCWA comments that the tentative permit includes new, more stringent ammonia limits based on U.S. EPA's updated 2013 National Ambient Water Quality Criteria for ammonia, and based on a finding of mussels present due to the Nature Conservancy's August 2010 report. The City of Manteca's (City) effluent is unable to immediately comply with the new, more stringent water quality--based effluent limitations. Accordingly, the Tentative Order properly includes a compliance schedule for ammonia. However, the tentative permit does not include an interim effluent limitation for ammonia. CVCWA recommends that the tentative permit be revised to include an interim limit for ammonia.

**RESPONSE:** Please see Response to Discharger Comment 1.

### CVCWA Comment II. Land Discharge Specifications and Recycling Specifications

CVCWA requested modifications to the proposed Permit for the requirements to Land Discharge and Recycled Water. CVCWA had six main comments in this item:

1) Application of Land Discharge vs Recycled Water Specifications – Section IV.C.3

**Comment:** CVCWA requests that the requirements listed under the section titled "Land Discharge Specifications" (Section IV.B) are moved to the section titled "Recycling Specifications" (Section IV.C).

**Response:** The requirements contained in the Land Discharge Specifications section are related to water quality concerns and compliance with the Basin Plan. The requirements contained in the Recycling Specifications are related to conditions specified in Title 22 Reclamation Regulations for recycling wastewater. Therefore, staff does not recommend combining the two sections. To clarify the purpose of the two separate sections, the section names have been revised in the proposed Permit. Section IV.B, "Land Discharge Specifications" has been changed to "Land Application Area Specifications," and Section IV.C "Recycling Specifications" has been changed to "Title 22 Recycling Specifications."

2) Application of Land Discharge vs Recycled Water Specifications – Section IV.C.3

**Comment:** CVCWA comments that based on the facts described in the Tentative Order, it appears that the City is applying recycled water at agronomic rates and thus should be subject to water recycling specifications and not land discharge specifications. Further, CVCWA also noted that the land discharge specifications are more stringent than necessary with respect to the application of recycled water, and are inconsistent with both the State Water Resources Control Board's (State Water Board) General Waste Discharge Requirements for Recycled Water Use (General Order)<sup>1</sup> as well as other

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<sup>1</sup> General Waste Discharge Requirements for Recycled Water Use, Order WQ 2014-0090-DWQ, adopted by the State Water Board on 3 June 2014 (Recycling General Order)

orders of the Central Valley Water Board specifically Waste Discharge Requirements and Master Recycling Permit for the City of Lathrop (Lathrop WDRs)<sup>2</sup>.

**Response:** The Discharger applies undisinfected secondary recycled municipal wastewater that is mixed with food processing industrial wastewater from Eckert Cold Storage, which is a food processor of frozen vegetables (e.g., cabbage and a variety of peppers). The Recycling General Order and the Lathrop WDRs are for the regulation of domestic wastewater, not food processing wastewater.<sup>3</sup> Food processing wastewater is of higher strength than secondary treated domestic wastewater (i.e., contains greater concentrations of biochemical oxygen demand, total nitrogen, and total dissolved solids). The proposed Permit requires additional regulations to protect groundwater and prevent nuisance to ensure compliance with the Basin Plan.

3) Nitrogen Mass Loading to Land Application Areas for Recycled Water – Section IV.B.2

**Comment:** CVCWA comments that the Tentative Order includes a requirement that would limit total nitrogen mass loading to the land application areas, and would require the City to calculate such loading using an equation contained in the Tentative Order. This provision as it applies to recycled water applications exceeds requirements contained in the General Order and the Lathrop WDR. CVCWA further comments, this would require compliance with a strict equation that is based on published nitrogen uptake rates and fails to realize that nitrogen uptake rates vary based on weather, soil conditions, and many other factors. CVCWA recommends that Provision IV.B.2 be deleted.

**Response:** The equation in the proposed Permit is simply a conversion metric that is provided to help the Discharger report their nitrogen balance to the Board in a standardized format; it does not contain any presumptions related to nitrogen uptake rates for any crop. The Discharger is required to submit a Nutrient Management Plan annually that demonstrates wastewater was applied at agronomic rates, including nitrogen loading. The Discharger *should* consider site-specific conditions of the crops, weather, soil conditions, etc. when conducting this evaluation. The inclusion of the Nitrogen Loading Equation does not preclude the Discharger from considering site-specific conditions.

4) BOD Loading to Land Application Areas for Recycled Water – Section IV.B.3

**Comment:** CVCWA comments that the Tentative Order would require compliance with a BOD<sub>5</sub> loading rate for the application of recycled water that is applied at agronomic rates. The Fact Sheet clearly notes that total monthly loading rates for BOD<sub>5</sub> are low, and that loadings are at agronomic rates. Further, the inclusion of such loading rates as a permit requirement for the application of recycled water is not a standard provision, and is inconsistent with the State Board's General Order and the Lathrop WDR. However, maintaining the requirement will subject the City to additional, extensive

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<sup>2</sup> Waste Discharge Requirements and Master Recycling Permit for City of Lathrop, Order R5-2015-0006, adopted by the Central Valley Water Board on 5 February 2015 (Lathrop WDRs)

<sup>3</sup> Finding 4 of the Recycling General Order states that, "Coverage under these General Waste Discharge Requirements (WDRs) for Recycled Water Use (General Order) is limited to treated municipal wastewater for non-potable uses." (page 1)

monitoring and reporting to determine strict compliance with the loading rate rather than certifying that applications occurred at agronomic rates. CVCWA recommends deletion of Provision IV.B.3.

**Response:** A BOD<sub>5</sub> loading rate is necessary due to the application of high strength food processing wastewater to the Land Application Areas. Since the Discharger typically blends low strength secondary treated municipal wastewater with the high strength food processing wastewater, the resulting BOD<sub>5</sub> loadings to the fields is low compared to most food processing wastewater applications. However, the permit does not mandate the blending of treated municipal wastewater with the food processing wastewater, so it is possible for the application of high strength food processing wastewater. Additionally, as discussed in Response to Discharger Comment 3, high BOD<sub>5</sub> loadings can result in reducing conditions that can mobilize metals, such as manganese. Manganese is naturally high in the groundwater in the vicinity of the Facility. The BOD<sub>5</sub> loading limit ensures adequate controls to limit reducing conditions that could result in the discharge contributing to the elevated manganese levels.

5) TDS Limit for the Application of Recycled Water – Section IV.B.4

**Comment:** CVCWA comments that the effluent limit for total dissolved solids (TDS) applies to recycled water immediately before application to the use areas. In addition to this requirement, the Tentative Order also includes groundwater limitations for both electrical conductivity and TDS, as well as an effluent limit for electrical conductivity for the surface water discharge. Considering the low level of TDS in the effluent, and the fact that the Tentative Order also includes groundwater limitations with respect to TDS, CVCWA Finds the TDS limit here to be unnecessary and inappropriate. CVCWA recommends deletion of Provision IV.B.4.

**Response:** See response to Discharger Comment 2.

6) Designated Waste – Section IV.B.5

**Comment:** CVCWA comments that under the California Water Code, designated waste is that which could be released in concentrations that exceed applicable water quality objectives. The Tentative Order includes groundwater limitations to protect discharges of waste from the facility, including from the land use areas that would cause groundwater to exceed water quality objectives. Groundwater limitations recognize that some constituents may be remediated through the soil profile, and thus, it is more appropriate to determine their impact on the groundwater rather than determining if recycled water exceeds water quality objectives at the time of application. By prohibiting the discharge of designated waste, the Tentative Order is essentially prohibiting the application of recycled water if any water quality objective is exceeded even though groundwater may not be impacted. CVCWA requests that the reference to “designated” waste should be removed.

**Response:** Central Valley Water Board staff concurs. The prohibition has been changed to state that “the discharge of waste classified as “designated”, as defined in section 13173 of the Water Code, in a manner that causes violation of groundwater limitations is prohibited.” An additional correction was made to section IV.B.5 of the

proposed Permit regarding the California Code of Regulations citation for hazardous waste. The prohibition was modified as shown below in underline/strikeout format:

5. The discharge of waste classified as “hazardous” as defined in the California Code of Regulations, title 23, section 2510 et seq., is prohibited, and section 2521(a) of Title 23, California Code of Regulations (CCR), the discharge of waste classified as or “designated”, as defined in section 13173 of the Water Code, in a manner that causes violation of groundwater limitations is prohibited.

7) Use of Irrigation Wastewater During Periods of High Precipitation – Section IV.B.6

**Comment:** CVCWA comments that provision IV.B.6 states that “[w]astewater may not be used for irrigation purposes during periods of significant precipitation, and for at least 24 hours after cessation of significant precipitation, or when soils are saturated. Significant rainfall is defined as 0.25 inches during a 24-hr period.” To be consistent with the Lathrop WDR, CVCWA recommends that this provision be revised to state as follows: “Discharge to Use Areas shall not be performed during rainfall or when the ground is saturated.”

**Response:** Central Valley Water Board staff concurs and has modified the proposed Permit accordingly.

### **CVCWA Comment III. Groundwater Limitations.**

CVCWA requested modifications to the proposed Permit regarding the EC, TDS, and ammonia groundwater limitations. CVCWA had two main comments in this item:

1) EC and TDS Limits – Section V.B. Table 6

**Comment:** CVCWA comments that the Tentative Order includes groundwater limitations for both electrical conductivity and TDS. Considering that both are measurements of salinity, CVCWA contends that it is not necessary, or appropriate, to include groundwater limitations for both measurements. Further, CVCWA indicates that the City has completed its site-specific study and thus it is appropriate for the groundwater limitation to be set based on the City’s study, and not defer to the already completed study. CVCWA request that one of the limitations should be removed from Table 6.

**Response:** Central Valley Water Board staff concurs. TDS can be used as an indicator parameter for salinity, therefore, groundwater limitations are not necessary for both EC and TDS. The proposed Permit has been modified to remove the groundwater limitations for EC.

2) Ammonia Limits – Section V.B. Table 6

**Comment:** CVCWA comments that the groundwater limitation for ammonia is based on an interpretation of the narrative taste and odor objective. The limitation of 1.5 mg/L is not an adopted objective and should be deleted from Table 6. Rather, and taking the Lathrop WDR as an example, a more appropriate groundwater limit would be that the release of waste constituents shall not cause groundwater to “contain taste or odor-

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producing constituents, toxic substances, or any other constituents in concentrations that cause nuisance or adversely affect beneficial uses.”

**Response:** Central Valley Water Board staff concurs and has modified the proposed Permit accordingly.

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## NEIGHBORS UNITED COMMENTS

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### Neighbors United General Comment

Neighbors United (NU) comments that the City should upgrade their current recycle water system to increase the re-use of tertiary wastewater to be used not only for cattle fodder crops but also to be used for food crops. NU emphasizes that the rationale for supporting the City's Facility upgrades is based on California's current extreme and exceptional drought and thus the importance of investigating all usable water sources. Based on the City's lack of corrective actions for their various NPDES discharge violations, NU inferred that lack of funding restricts the City at this point on making these upgrades. NU noted that with the use of State funding for recycled water programs, the City could complete these necessary upgrades. NU request to require the City to investigate as to whether upgrading their facility is possible through the new recycling program prior adopting the City's NPDES permit.

**RESPONSE:** Central Valley Water Board staff appreciates the comments received from Neighbors United. However, the comments are not related to any specific requirements in the proposed permit and the renewal cannot be delayed while the Discharger evaluates reclamation alternatives. The Central Valley Water Board encourages wastewater recycling and due to the current drought conditions has been making increased efforts to expedite all applications for new recycling projects. The proposed permit allows recycling of wastewater for feed and fiber crops and for dust control (e.g., during construction projects). The Facility contains tertiary filtration and ultraviolet light (UV) disinfection, resulting in a high quality effluent that meets Title 22 reclamation requirements for unrestricted use (California Code of Regulations Title 22, Section 60301.230). The tertiary treated wastewater is suitable for recycling on parks, playgrounds, golf courses, etc. and, according to City staff<sup>4</sup>, the City is currently developing a recycled water plan to evaluate the feasibility of expanding the reclamation of its high quality effluent. Potential reclamation uses include: 1) Big League Dreams baseball/softball complex, 2) City of Manteca's municipal golf course, and 3) Public parks starting with the larger ones closer to the treatment plant.

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<sup>4</sup> 16 March 2015 email from Heather Grove, City of Manteca WQCF Laboratory Supervisor to James Marshall, Central Valley Water Board