Public Works Department

October 19, 2015

Via e-mail
RB5S-NPDES-Comments@waterboards.ca.gov

Mr. James D. Marshall
Senior Water Resources Control Engineer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

NPDES Permit No. CA0081434

SUBJECT: Comments on the 2015 Tentative Waste Discharge Requirements for the City of Galt Wastewater Treatment Plant and Reclamation Facility

Dear Mr. Marshall:

Thank you for providing the opportunity to the City of Galt (City) to review and submit comments on Order R5-2015-XXXX (Tentative WDRs), which is a new, separate permit regulating discharge of recycled water and biosolids from the City's Wastewater Treatment Plant and Reclamation Facility (WWTP) to the City's agricultural fields (Reuse Area). The Tentative WDRs was issued for public comment by the Central Valley Regional Water Quality Control Board (Regional Board) on September 17, 2015, and comments are due no later than 5 PM on October 19, 2015. The Regional Board currently regulates surface water and land discharge from the WWTP under Waste Discharge Requirements Order No. R5-2010-0099, NPDES No. CA0081434 and Time Schedule Order R5-2015-0900.

The City appreciates the time and effort that you and your staff have put into developing the Tentative WDRs. The City especially appreciates the incorporation into these documents revisions to the existing discharge permits that were requested in the City's permit renewal application and the Report of Waste Discharge (ROWD). This letter summarizes the City's additional comments on the Tentative WDRs.

Major Comments on the Tentative WDRs

1. ***Provide Additional Time to Comply with Reuse Area Stormwater Runoff Containment Requirements and Include a Provision for an Optional Group Pathogen Study***

The City land applies "Undisinfected Secondary" recycled water and biosolids to agricultural fields surrounding the WWTP (the "Reuse Area") in accordance with Title 22 requirements. Special Provision C.3.d.viii, prohibits discharges of stormwater runoff from the Reuse Area starting December 1, 2020. The Tentative WDRs' Fact Sheet (page 5) states that the City will need "to construct additional facilities [at the WWTP] that will enable the [City] to contain the appropriate volume of water that a large winter storm is capable of producing."

While the City appreciates that the Regional Board staff has proposed a five-year compliance period, the City is concerned that five years is not adequate to evaluate and implement a preferred compliance strategy. Specifically, the City has recently proposed a potential group study to evaluate the potential pathogen risks associated with potential human exposure to stormwater runoff from agricultural areas where "Undisinfected Secondary" recycled water is applied for crop irrigation to both the Central Valley Clean Water Association (CVCWA) and other potentially impacted parties. Based on the feedback received, it appears that there is significant support for such an effort.

Blanket application of a stormwater containment requirement will not only impact the City of Galt, but it will also impact a number of facilities throughout the Central Valley.

The City, CVCWA, and the parties contacted are all concerned that the Regional Board staff has established a requirement for year-round stormwater runoff containment that is not based on any actual scientific data or established regulation. Moreover, as stated, the proposed stormwater containment requirement implies that the containment system must be designed for essentially any size storm. Applying such a standard to an area that is hundreds of acres in size would be virtually impossible to achieve - particularly at facilities where land application areas are subject to flooding and direct human exposure is questionable during the winter season. Given the major implications of the proposed stormwater containment requirement, coupled with the fact that there is no scientific evidence to support the need for such a requirement, the City contends that the WDRs should provide adequate time for the completion of a group Pathogen Risk Study that identifies appropriate guidelines for pathogen control from irrigation reuse areas that receive "Undisinfected Secondary" recycled water.

Because it will take more time for a group study to be organized and implemented than a discharger-specific study, an approximate five-year schedule is proposed for the Pathogen Risk Study, as follows:

- Twelve months to form a Pathogen Risk Study Special Projects Group, set up the appropriate inter-agency agreements to facilitate the study, and set up the appropriate contracting for the study with the consultant.
- Six months to develop a Pathogen Risk Study Work Plan for Regional Board Executive Officer approval.
- Six months for Regional Board staff review and Executive Officer approval of the Work Plan.
- Two years to complete the Pathogen Risk Study.
- Six months to complete the Pathogen Risk Study Report (note added time is assumed here due to an anticipated rigorous review effort by multiple parties, including the CVCWA Executive Committee).
- Six months for the Regional Board staff to review the Pathogen Risk Study Report and develop guidance regarding the need to contain stormwater from agricultural areas where "Undisinfected Secondary" recycled water is applied for crop irrigation.

The City would then, if necessary, implement the needed best management controls to manage onsite stormwater based on the findings of a Regional Board Executive Officer approved Pathogen Risk Study (as needed). If under a worst-case scenario the Pathogen Risk Study supported a finding that year-round containment is appropriate, the City would need an additional four years to complete this effort, as follows:

- One year to evaluate the City's site-specific options for meeting the containment requirements based on the findings of a Regional Board approved Pathogen Risk Study.
- One year to design appropriate improvements.
- Two years to construct improvements.

Based on the two schedules identified above, the City requests that the work effort for the compliance deadline in the WDRs permit be defined to only cover the study, and that WDRs findings and fact sheet (or staff report) reflect a time frame extended to January 1, 2025, thus providing a nine-year overall schedule.

To accommodate the requested changes, the Tentative WDRs should be modified to acknowledge the City's plan to participate in a group Pathogen Risk Study and to specifically indicate that the permit may be reopened and modified pending the results of this effort. The following specific modifications are requested to the Tentative WDRs:

C. Special Provisions

1. Special Studies, Technical Reports and Additional Monitoring Requirements ~~***– Not Applicable***~~

a. ***Pathogen Risk Study.*** *The Discharger proposes to participate in a group Pathogen Risk Study to 1) characterize the potential human health risks associated with potential exposure to pathogens in stormwater runoff from pasture land irrigated with*

"undisinfected secondary" effluent, and 2) define and evaluate appropriate control strategies (best management practices) for minimizing, to the extent practicable, pathogenic organisms from migrating off the Reuse Area site with stormwater runoff. The Pathogen Risk Study must comply with the following schedule:

Task	**Compliance Date**
Submit Work Plan	18 months following effective date of permit.
Begin Study	Within 30 days of Regional Board approval of the study Work Plan.
Complete Study	No longer than 2 years after commencement of the study.
Submit Study Reports	Six months after completion of the study.

3. ***Special Provisions for Municipal Facilities (POTWs Only)***

...

d. ***Agricultural Reuse Area Specifications***

...

viii. Effective 1 ~~December~~ January 202~~0~~5, *unless expressly authorized by the Executive Officer pursuant to Provision VI.C.1.a, discharge of storm water runoff from the Reuse Area to off-site land or surface water drainage courses is prohibited.*

ix. Effective immediately and until 1 January 202~~5~~, *there shall be a minimum of 30-days* (sic) *since the last application of wastewater and/or biosolids on the Reuse Area prior to the discharge of storm water runoff from the Reuse Area to off-site land or surface water drainage courses.*

2. ***Clarify that the Discharge Prohibition III.C (Regarding Discharges of "Waste" to Surface Water) Does Not Apply to Stormwater Discharges (Page 5)***

Discharge Prohibition III.C prohibits any discharge of waste to surface water or surface water drainage course. The City requests that the Regional Board provide further explanation or qualification to ensure that the City is not in violation of a discharge prohibition because of stormwater runoff from the agricultural reuse fields. This type of discharge would be exempt from the Clean Water Act, and the Tentative WDRs should include the necessary qualifications to protect the City from regulatory uncertainty.

3. ***Remove Total Nitrogen Groundwater Limitation (Page 8)***

Section V.A of the Tentative WDRs proposes a groundwater limitation of 10 mg/L for total nitrogen. This is in addition to a groundwater limitation of 10 mg/L for nitrate (as N). Setting a groundwater limitation for total nitrogen is inappropriate for several reasons. There is no water quality objective for total nitrogen. There is a primary maximum contaminant level (MCL) for nitrate, but not for total nitrogen. For this reason, the proposed limit is not consistent with any adopted water quality objective or known criteria.

Total nitrogen is also different and distinguishable from nitrate, and setting a groundwater limit for total nitrogen will not necessarily translate to obtaining the target nitrate levels. There are no findings in the Tentative WDRs that provide any reasoning or explanation why a total nitrogen effluent limit will result in maintaining groundwater quality at the Primary MCL of 10 mg/L for nitrate. At most, the Regional Board could determine that a groundwater limitation for nitrate is appropriate to protect groundwater quality. The City requests that the groundwater limitation for total nitrogen be removed from the Tentative WDRs.

4. *Remove the Requirement for Calculating Adjusted Cumulative Pollutant Loading Rates (pages 7, E-9 and E-12)*

Land Discharge Specification A.3.d of the Tentative WDRs requires the City to calculate an adjusted cumulative loading rate for metals in the biosolids, based on the USEPA's Cumulative Pollutant Loading Rates (CPLRs) and "Actual Site Background Soil concentrations." However, the permit does not require soil monitoring, so the City would not be routinely determining soil concentrations of the parameters of interest. In addition, the USEPA requirements from which the CPLRs are taken (40 CFR Part 503) do not require ongoing soil monitoring but only that cumulative loadings since 1993 be taken into account. The City has been in control of the Reuse Area since before 1993 and has routinely monitored biosolids and recycled water loadings of metals since 2004. As documented in the ROWD, cumulative metals loadings that have occurred since 2004 are far below the applicable limitations. For these reasons, the City requests that the requirement to calculate and comply with adjusted cumulative loading rates be removed from the permit. The following specific changes are requested:

On page 7:

d. Biosolids shall not be applied in amounts exceeding the ~~adjusted~~ cumulative pollutant loading rate ~~(BC) as defined below:~~

~~*BC=CR-1.8(BS), where:*~~

~~*BC = Adjusted Cumulative Loading Rate (lbs/ac)*~~

~~*CR = 40 CFR Part 50. Cumulative Pollutant Loading Rate (lbs/ac)*~~

~~*BS = Actual Site Background Soil concentration (mg/Kg)*~~

~~The values for~~ (CR) for each metal as ~~are~~ given in Table 6 below:

On page E-12:

~~*i. **Cumulative Adjusted Loading Rates** shall be calculated for arsenic, cadmium, copper, lead, mercury, nickel, selenium, and zinc using the equation described in Section IV.A.d of the Limitations and Discharge Requirements. The cumulative adjusted loading rates for the metals described above shall be reported in the annual report with supporting calculations.*~~

5. *Revise Deadline in the WDRs for Annual Biosolids Report (page 10)*

Special Provision C.3.b.ii of the Tentative WDRs has a February 1 deadline for a biosolids annual report. The deadline for the biosolids annual report required by USEPA's (which contains all of the information required by the annual report required by the permit) is February 19. Therefore, the City requests that the deadline for the annual biosolids report be revised to be consistent with the USEPA deadline.

6. *Remove Irrelevant Definitions and Related References from the WDRs (Attachment A)*

Attachment A of the Tentative WDRs includes a number of terms that are not referenced in the permit and not relevant. These include "average weekly effluent limit," "coefficient of variation," "instantaneous maximum effluent limitation," "instantaneous minimum effluent limitation," "minimum level," "persistent," "pollution prevention," and "satellite collection system." For clarity, the City requests that these terms and their definitions be removed from Attachment A.

Removing "minimum level" will also require replacing related references to "ML" in the permit to "RL" for the "Reporting Level" (see the next comment). Such references occur in the definition of "estimated chemical concentration" and on page E-8 in Reporting Requirement VIII.A.4.d.

Page E-8 also includes a reference to an AWEL (i.e. an "Average Weekly Effluent Limit") in Reporting Requirement VIII.A.5. The last sentence on this page also refers to calculating "weekly averages" for compliance purposes. The permit does not include any AWELs, so these references should also be removed for clarity.

7. Remove References in the WDRs to "SIP," "Priority Pollutants," and the WDRs as an "NPDES Permit" (Attachments A, E, and F)

The definition of "Reporting Level" in Attachment A of the Tentative WDRs refers to the "SIP," as do several footnotes in the Monitoring and Reporting Program (Attachment E). The "SIP," the State Water Resources Control Board's 2005 *Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California*, is relevant only to surface water discharges. The SIP is not relevant to land discharges and should thus not be referenced in the Tentative WDRs.

The City thus requests that references to the "SIP" be removed, including revising the definition of "Reporting Level." The definition of "Minimum Level" in the Tentative WDRs (which is a term used in the SIP) could be revised to reflect a definition for "Reporting Level" that is not tied to the SIP by replacing "ML" with "RL" and changing the first sentence in the definition as follows:

> ~~*Minimum*~~ *Reporting Level (R~~M~~L) is the concentration (and it's associated analytical method) at which the entire analytical system must give a recognizable signal and acceptable calibration point. The ~~M~~RL is the concentration in a sample that is equivalent to the concentration of the lowest calibration standard analyzed by a specific analytical procedure, assuming that all the method specified sample weights, volumes, and processing steps have been followed.*

The definition for the Reporting Level (RL) can then be removed. For references to the "SIP" in the footnotes, the City suggests removing the remaining text of each footnote after "40 CFR Part 136."

The Tentative WDRs also include references in Attachments E and F to "priority pollutants" and "priority toxic pollutants," which are relevant to NPDES requirements only. In addition, Attachment F includes multiple references to the WDRs as an "NPDES Permit," which it is not. These references to NPDES Permit are found specifically on pages 16, 19, and 21. The City also requests that references to these terms that are not applicable to State regulations be removed from the WDRs for clarity.

8. Revise Figures and References to Reflect Conversion of Field 1 to a Rifle Range and Discontinued Use of MW-6 (Attachment B)

Since completing the ROWD, the City has converted Zone 1 of Field A to a rifle range for the City's police department. Therefore, the site map in the WDRs needs to be updated to reflect this change. A revised site location map and a revised irrigation facilities layout are attached to this letter for inclusion, as appropriate. Also note that the revised Irrigation Facilities Layout also no longer shows MW-6, which is not mentioned in the permit and no longer part of the City's groundwater monitoring network.

In addition, since Zone 1 of Field A has been converted to a rifle range, the Reuse Area now totals 164 acres, not 172 acres. Therefore, references in the permits to the "172 acres" will need to be revised to be accurate. In addition, discussion in the Fact Sheet of the Tentative WDRs of the firing range as being planned need to be revised. References to the "172 acres" are found on pages 4, 5, 7 of the Fact Sheet of the Tentative WDRs. The discussion on page 4 of the Fact Sheet of the Tentative WDRs also requires other related revisions to be accurate. The recommend revisions are as follows:

> *A portion of the Discharger's effluent is used to irrigate the Reuse Area, which consists of approximately 164~~172~~ acres of agricultural fields located adjacent to the main Facility site. The Discharger's land application area is split into two fields: Field A and Field B. Field A is approximately 114~~122~~ acres, and Field B is approximately 50 acres. Field A is further divided into 13~~14~~ different zones, ranging in size from 6.7 acres to 24.6 acres. ~~One of these zones (8.3 acres) will no longer be used as Reuse Area when the planned expansion of a nearby Police Firing Range is implemented. This change will bring the total Field A acreage to approximately 114 acres and total Reuse Area acreage to 164 acres.~~*

9. Revise Biosolids Sampling Location in the WDRs (page E-7)

Footnote 1 of the Tentative WDRs' Table E-6, which contains biosolids monitoring requirements, requires collection of a composite biosolids sample "during the hours of biosolids wasting… and in accordance with U.S. EPA's POTW Biosolids Sampling and Analysis Guidance Document…" The City stabilizes their biosolids in a sludge lagoon, followed by dewatering and drying on the City's storage areas. Because changes in biosolids quality would occur between when the solids are wasted and when they are actually land applied, it would not be appropriate to collect samples from the solids while they are being wasted. Table 2.2 of the referenced USEPA guidance document describes appropriate sampling points for different biosolids processes and indicates that sampling of biosolids dewatered in drying beds should be collected as samples collected from the center of four quarters of the bed.

To be consistent with the USEPA's guidance document, the City therefore requests that this Footnote 1 be revised as follows:

1. *A composite sample of biosolids shall be collected from each drying bed by dividing each bed into quarters and grabbing equal amounts of sample from the center of each quarter and then combining the grab samples, ~~hourly during the hours of biosolids wasting over a 24-hour period and~~ in accordance with U.S. EPA's POTW Biosolids Sampling and Analysis Guidance Document, August 1989, (or most recent edition).*

10. Reduce the Requirement to Provide Narrative Results and an Evaluation of Groundwater Limitation Compliance from Semi-Annually to Annually

The Tentative WDRs require that the semi-annual groundwater reports include "a narrative discussion of the analytical results for all groundwater locations monitored including spatial and temporal tends, with reference to summary data tables, graphs, and appended analytical reports (as applicable)" and a "comparison of monitoring data to the groundwater limitations and an explanation of any violation of those requirements." The City requests that these two specific requirements be reduced from semi-annually to annually. This evaluation requires an outside consultant to perform, and the variations that occur on a semi-annual basis are not that significant. Therefore, the City believes that an annual evaluation of the groundwater data is adequate to identify potential groundwater compliance issues. This change would require removal of items "iv" and "v" from the Groundwater Monitoring Reports (Section VIII.B.6) portion of the Monitoring and Reporting Program and placing these items the Annual Report (Section VIII.C.1) portion of the Monitoring and Reporting Program.

11. Remove Skunk Creek as the Receiving Water (Fact Sheet, page F-1)

Table F-1 states that the Receiving Water is Laguna Creek, via Skunk Creek and that the Receiving Water Type is an "Inland surface water." This table needs to be modified to reflect the receiving water "Underlying Groundwater."

12. Accurately Describe the Title 27 Exemption in the Tentative WDRs (Fact Sheet, pages F-7 and F-8)

Section III.C in the Fact Sheet of the Tentative WDRs describes the Regional Board's finding regarding exemption of the City's land application facilities from requirements of the California Code of Regulations Title 27 (Title 27), which regulates hazardous waste discharges. The discussion presented regarding the Title 27 exemption for the City's storage reservoir and ponds and the biosolids application are not properly addressed in the Tentative WDRs. The City has the following specific comments regarding this matter:

a. The Effluent Storage Reservoir and Storage Ponds are exempt from Title 27 requirements as reuse facilities when storing either secondary or tertiary treated effluent.

The Tentative WDRs state that storage of secondary treated effluent is exempt from Title 27 requirements under Section 20090(b) for "wastewater." On February 7, 2012, the State Water Resources Control Board (State Water Board) amended Order WQ 2009-0005, *In the Matter of Own Motion Review of City of Lodi Waste Discharge Requirements and Master Reclamation Permit, Order No. R5-2007-0113 (Lodi Order) to revise the application of the sewage exemption of Title 27 of the California Code of Regulations* (Title 27) to clarify that facilities used to store treated wastewater and recycled water prior to disposal or reuse qualify for the unconditional portion of the sewage exemption Section 20090(a), provided that the storage facilities are: (1) are used to store treated municipal wastewater prior to ultimate disposal or reuse; (2) do not receive any other wastes other than on-site stormwater flows if authorized by the State Water Board or the applicable Regional Water Board; and (3) are under the control of the municipal treatment plant. The storage ponds at the City of Galt WWTP meet all of these criteria. Therefore, the City requests that the permit be revised to reflect the fact that the storage ponds are unconditionally exempt from Title 27 per Section 20090(a).

b. The application of biosolids to the Reuse Area is exempt from Title 27 requirements because these biosolids are beneficially reused as a soil amendment.

The Tentative WDRs state that the City's disposal of biosolids (sludge) "meets the preconditions to qualify for exemption from Title 27" requirements because the groundwater quality associated with this practice is in compliance with the Basin Plan. The City land applies dewatered Class B biosolids to selected agricultural fields between cropping cycles as a soil amendment. The use and disposal of biosolids comply with existing Federal and State laws and regulations, including permitting requirements and technical standards in Code of Federal Regulations (CFR) Part 503. The land application of biosolids on the Agricultural Fields as a soil amendment is exempt from Title 27 pursuant to Section 20090(f). Therefore, the City requests that the permit be revised to reflect the fact that the discharge of Class B biosolids to land is unconditionally exempt from Title 27 per Section 20090(f).

Minor Factual or Typographical Corrections

The City's comments on minor factual inconsistencies or typographical corrections in the Tentative WDRs are provided in Table 1. The first column of the table indicates the location of the permit to which the comment applies, and the second column includes the City's suggested revisions. Several of the suggested revisions, for clarity, are provided in a "tracked-changes" format (blue, underlined text indicates text to add; red, struck-through text indicates text to remove).

Table 1. Minor Comments on Tentative WDRs	
Location	**Comment**
Page 1, Table 2	Assessor's Parcel Number for the Reuse Area was left blank in the tentative WDRs. The APN number is 148-0010-053.
Monitoring and Reporting Program (Attachment E)	
Page E-3, Reclamation Monitoring Requirements (V), Monitoring Locations REC-001 (A), Item 1	Reference to "biosolids" is not relevant for sampling of the irrigation water and can be removed for clarity: "Sampling is not required during periods when no wastewater~~, or biosolids, are~~ is discharged to the Reuse Area…"
Page E-4, Reclamation Monitoring Requirements (V), REC-001 (A), Item 1, Table E-4	Footnote 3 of the table indicates agricultural zones up to zone 19, but the City's zones only go up to number 18. Also, Zone 1 is no longer part of the Reuse Area. The City thus requests the following revisions: "For each land application area (Zones ~~1~~2-1~~9~~8)."
	The reference to footnote 5 is unclear in its current location. The City thus recommends moving the reference to after each occurrence of "1/week/event", i.e. to be "1/week/event[5]".
Page E-9, Reporting Requirements (VIII), SMRs (B), Item 3	The last sentence of this item ("In addition, the following shall be calculated and reported in the SMRs:") is incomplete and unnecessary. This sentence should be removed.
Page E-9, Reporting Requirements (VIII), SMRs (B), Item 6.a	A period is missing: "…and groundwater (Section VI). Data shall be…"
Page E-9, Reporting Requirements (VIII), SMRs (B), Item 6.e	Loading rate should be calculated in units of "inches/day" to be consistent with Table E-4: "Hydraulic loading rates (inches/~~acre/month~~day) shall be calculated.
Page E-9, Reporting Requirements (VIII), SMRs (B), Item 6.f	"The Total Nitrogen loading rate shall be calculated for each irrigation field and/or zone (as shown in Attachment B~~C~~-2)…Loading rates for supplemental nitrogen (e.g. fertilizers and biosolids), when applicable, shall be calculated and included in the total nitrogen loading rate for each irrigation zone ~~field~~ on a monthly basis … The cumulative nitrogen loading rate for each irrigation field and/or zone …"

Table 1. Minor Comments on Tentative WDRs (*continued*)

Location	Comment
Monitoring and Reporting Program (Attachment E) *(continued)*	
Page E-10, Reporting Requirements (VIII), Self Monitoring Reports (SMRs) (B), Item 6.g	Groundwater monitoring is required semi-annually per Table E-5, so the City understands that submission of groundwater monitoring reports would also be on a similar semi-annual schedule (not quarterly as indicated), consistent with the general reporting schedule in Table E-7. The City recommends the following specific revisions to this item: "The Discharger shall establish a ~~quarterly~~ semi-annual sampling schedule for groundwater monitoring such that samples are obtained approximately every ~~three~~ six months. ~~Quarterly~~ Semi-annual monitoring reports shall be submitted to the Board in accordance with the Reporting Schedule in Table E-7 ~~by the 1st day of the second month after the quarter (i.e. the January-March quarterly report is due by May 1st)~~ and shall include the following…"
Page E-11, Reporting Requirements (VIII), Other Reports (C), Item 1	"…An Annual Report shall be prepared and shall include all annual monitoring data …applicable to land application~~s~~…"
Page E-12, Reporting Requirements (VIII), Other Reports (C), Item 1.a	"Tabular and graphical summaries of historical monthly total loading rates for water (hydraulic loading in inches) and total nitrogen.
Fact Sheet (Attachment F)	
General Comment	The Fact Sheet does not include any page numbers. The City expects that the final Fact Sheet would include page numbers. For purposes of this table, the page with the Table of Contents for the Fact Sheet is considered to be page F-1, consistent with the Tentative NPDES Permit.
Page F- 2	The second full paragraph of the Fact Sheet refers to a "standardized format" and that sections not applicable are marked "not applicable". It is our understanding that the template for the WDR is not a standardized format, and this language is referring to the standard format used for NPDES permits.
Page F-3, Facility Description (II)	The introductory text of the facility description could be read to say that the facility always provides tertiary level of treatment, which is not accurate. The City thus requests that the description be revised as follows: "The Facility is currently a 3.0 million gallon per day (mgd) average dry weather flow (ADWF) facility that can provide~~s~~ a tertiary level of treatment of municipal wastewater from the City of Galt."

Table 1. Minor Comments on Tentative WDRs (*continued*)	
Location	**Comment**
Fact Sheet (Attachment F) (*continued*)	
Page F-4, Facility Description (II), Item A	The second full paragraph on this page says that the City's biosolids disposal practices "qualifies the biosolids as 'Class B' biosolids…" The City meets Class B standards through testing. Therefore, it is more accurate to say that the solids treatment and disposal practices are adequate to meet Class B standards. The City thus requests that the description be revised as follows: "The combination of (1) stabilization of solids within the oxidation ditch and the storage lagoons, and (2) the Discharger's disposal practices is adequate to meet ~~qualifies~~ the ~~biosolids as~~ "Class B" biosolids standards in accordance with the USEPA's regulations as established in Code of Federal Regulations, Title 40 Section 503."
Page F-7, Applicable Plans, Policies, and Regulations (II), Other Plans, Policies and Regulations (C), Title 27, Item 1	The City has repurposed one of the four storage ponds as a solar facility. Thus, there are only three effluent storage ponds at the WWTP. In addition, wastewater directed to the storage ponds will either be re-treated through the entire plant or land applied. The City thus requests the discussion of the storage ponds be revised as follows: **"Effluent Storage Reservoir and ~~four~~ three Effluent Storage Ponds**. The storage reservoir is used to store at least secondary-level treated municipal wastewater for agricultural reuse. Treated wastewater may be directed from the reservoir to the ~~four~~ three storage ponds, and then redirected to the reservoir when needed for agricultural reuse. …. Tertiary treated effluent that does not meet NDPES permit limits may be diverted into the storage reservoir and then either returned to the Facility ~~treatment system for further tertiary level~~ headworks for re-treatment before discharging to Laguna Creek, or land applied in accordance with the requirements established by this Order."
Page F-9, Rationale for Effluent Limitations and Discharge Specifications (IV), Final Effluent Limitations (B), Item 1	The second sentence of this item indicates that the permit requires limits on BOD loadings, which is not accurate. The City thus recommends the following revision for clarity: "This Order requires the Discharger to limit the hydraulic, and total nitrogen~~, and BOD~~ loadings to the extent…"
Page F-12, Rationale for Receiving Water Limits, Groundwater (A), Groundwater Quality (3), Item a	"**Background Conditions.** …'Subsurface stratigraphic formation information for the WWTP was limited…"

Page F-12, Rationale for Receiving Water Limits, Groundwater (A), Item 2	The reference in the first sentence of this item to "four" effluent storage ponds should be revised to refer to "three" instead: "The Discharger utilizes…and ~~four~~ three unlined effluent storage ponds."

Table 1. Minor Comments on Tentative WDRs (*continued*)

Location	Comment
Fact Sheet (Attachment F) (*continued*)	
Pages F-13 and F-14, Rationale for Receiving Water Limits, Groundwater (A), Groundwater Quality (3), Item b	The last full sentence of the last paragraph on page 13 references "section area #19," which should refer to "Field B" instead. The City thus requests the following correction: "Monitoring well MW-4R is located near the southwestern edge of ~~the current biosolids application area in~~ Field B~~section area #19~~."
	For the last sentence of this item (on page F-14): "Tables F-2 through F-4 below summarize the groundwater monitoring data from the period of Fourth Quarter…"
Page F-16, Rationale for Receiving Water Limitations, Groundwater (A), Groundwater Limits (4)	The next-to-last sentence of this section references a groundwater limitation for nitrite but not one for total nitrogen, but the tentative WDRs include a groundwater limitation for total nitrogen and not nitrite. The City thus recommends the following revision for clarity: "This Order also includes numeric groundwater limitations for TDS, nitrate, ~~nitrite~~, total coliform…"
Page F-19, Public Participation (VIII), Item A	"Notification was provided through the Central Valley Water Board's website and publication in The Galt Herald on September 30, 2015.

The City appreciates the opportunity to review the Tentative WDRs and provide comments to help ensure that the final documents are clear and effective regulatory documents. Please feel free to contact me at 209-366-7260 or Kathryn Gies of West Yost Associates at 925-949-5815 should you have any questions on these comments.

Sincerely,

Mark A. Clarkson, P.E.
Utilities Manager
cc: Kathryn Gies, West Yost Associates (*email*)
Attachments (2)