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September 1, 2016

Mr. Scott Hatton
CA Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706-2020

RE: LATON COMMUNITY SERVICES DISTRICT – TENTATIVE ORDER

Dear Mr. Hatton:

After meeting and reviewing the Tentative Order with the Manager and Chief Plant Operator for the Laton Community Services District, the District has requested that I provide you with the following comments/requests:

1. Every three years the District has Title 22 testing conducted on each of their wells. The water quality history of the wells is well documented and available for review (historical results can be provided). The District requests that the present 3-year testing frequency be continued, in-lieu of requiring annual testing. Increasing the frequency of testing to annual would result in a substantial cost to the District;
2. Instead of requiring a 24-hour composite sampler for the influent and effluent streams at the wastewater treatment plant, the District requests to continue providing an hourly composite sample consisting of eight (8) grab samples;
3. The District has submitted a planning grant application to the State Water Resources Control Board and the application is currently being reviewed. The planning grant includes an evaluation of the metering upgrades at the wastewater treatment facilities, along with a study on the potential for reuse of wastewater effluent on adjacent properties. The District requests that both the metering upgrades and the reuse study, as required in the Tentative Order, be delayed with completion being accomplished through the planning grant;
4. As previously discussed, there is an emergency basin located west of the aeration tanks. It is the District's understanding that this basin was part of the original construction, since the piping allows the aeration tanks to be drained into the

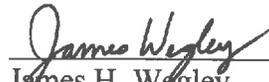
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emergency basin. The District requests that the use of this basin be allowed for the emergency bypass of wastewater or draining of the treatment tanks;

5. The District has a "HIPPO" (pumping device) that collects the surface duckweed in the evaporation/percolation ponds and pumps it to the adjacent fields. The pumped duckweed is collected within a sock or a retention basin. After pumping, the District removes and disposes of the duckweed. In addition to the duckweed, there is a small amount of water that is also pumped onto the field. The District requests to be able to continue this process for the removal of the duckweed with the pumped discharge being to the fields located east and west of the evaporation/percolation ponds;
6. On Page 14, Paragraph E.b., it states that the Total Coliform Organisms shall not exceed 2.2 MPN/100 mL. This maximum for the allowable coliform level is typically associated with drinking water systems. The wastewater facilities will not be able to meet this standard. The District requests that the requirements contained in this provision be deleted; and
7. On Page 10, reference is made to the Strathmore Public Utility District.

If you have any questions regarding the above requests or need additional information, please contact either the District or myself. The District appreciates the opportunity to review and comment on the Tentative Order.

Very truly yours,


James H. Wegley
Consulting Civil Engineer

JHW:je

cc: Laton Community Services District
Mr. Daniel Benas, CVRWQCB