

Elizabeth Thayer  
Regional Water Quality Control Board, Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, California 95670-6114

28 September 2008

**RE: CITY OF LINCOLN COMMENTS TO TENTATIVE ORDER, NPDES NO. CA0084476**

Dear Ms. Thayer,

Please accept these comments on behalf of the City of Lincoln pertaining to the tentative waste discharge requirements. I have been retained by the City to comment on this Order.

**Comment 1 (Table 6b, page 10):** The mass limitations are based on an ADWF of 4.2 mgd. The City regularly stores water in ponds for either potential reuse opportunities later in the year or to prevent violations of the temperature receiving water limitations during sensitive time periods. The outfall has a capacity of 18 mgd. The previous Order allowed for a discharge up to 12 mgd. Please modify the mass based limitations to either reflect that they are applicable only when discharging without releases from storage or in some other manner that allows for discharging more water than is treated on a daily basis.

**Comment 2 (Interim Limitation 3a, page 11):** The interim limitation is more restrictive than the final limitation for aluminum. Please assign the interim maximum day effluent limitation at 750 µg/L and state that the final average monthly or annual average effluent limitations are not effective until "5 years from permit adoption."

**Comment 3 (Special Provision C1g, page 20; Special Provision C2b, page 22):** Please remove the need to study salinity levels necessary to protect downstream beneficial uses. We understand that the current salinity, at less than 690 µmhos/cm, is suitable for all uses. This study has already been conducted.

**Comment 4 (Attachment B, page B-1):** Please revise the site plan as provided in the attached figure. The described area is in error.

**Comment 5 (Table E-1, page E-2):** Please remove "grit chamber" from the monitoring location description for INF-001. The facility does not have a grit chamber.

**Comment 6 (Table E-2, page E-2):** Please remove superscript “2” from the priority pollutant monitoring. Contamination at the levels of concern is likely when using composite sampling. Clean techniques can be more readily achieved by making use of grab samples.

**Comment 7 (Table E-3a, page E-3):** Please allow for once per week monitoring of BOD and TSS. Once per week monitoring is consistent with the current Order. More frequent monitoring is really unnecessary considering that turbidity monitoring is also occurring (more restrictive than TSS limit) and compliance with the effluent ammonia limitations assures compliance with the BOD limit (a long mean-cell-resident time is necessary to remove ammonia and if compliant, assures that the wastewater is sufficiently oxidized to comply with Title 22 requirements).

**Comment 8 (Table E-3a, page E-3):** Please clarify the reporting requirement for turbidity. We suggest the daily average and daily maximum value.

**Comment 9 (Table E-3b, page E-4):** Please eliminate the total coliform organism monitoring from the effluent. That requirement was already fulfilled at the filter clearwell where all effluent must pass.

**Comment 10 (Table E-3b, page E-4):** Please clarify how to report dissolved oxygen. May we report a daily average value when monitoring continuously?

**Comment 11 (Table E-8, page E-9):** Please eliminate the need to monitor instream flow to determine dilution ratio. The City does not rely upon dilution for compliance with any objective.

**Comment 12 (Table E-7, page E-10):** Please eliminate the need to report the number of banks in operation. The number of UV banks in operation changes over the course of a day. All of the information is maintained should troubleshooting require use of the information. Its reporting would be cumbersome and does not add value unless trouble-shooting a specific problem.

**Comment 13 (Table E-7, page E-10):** Please clarify how to report transmittance. May we suggest daily average and daily minimum?

**Comment 14 (Table E-7, page E-10):** Please clarify that reporting of dose, as described in footnote 2, is sufficient for the reporting of intensity sensor readings. The intensity sensor readings will be maintained on site, but their reporting is cumbersome.

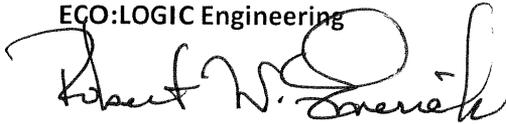
**Comment 15 (Table F-1, page F-1):** Please eliminate the 916-773-8100 office phone number. There is the possibility that someone would call an office when all messages need to go through the plant. Operation of the WWTRF is run entirely from the plant.

**Comment 16 (D, page F-5):** The new facility came on-line in 2004, not 1994. The suspended solids violation in July 2004 was due to the old plant that is no longer operating. There have not been any finable violations from the new WWTRF.

Thank you very much for considering these requests.

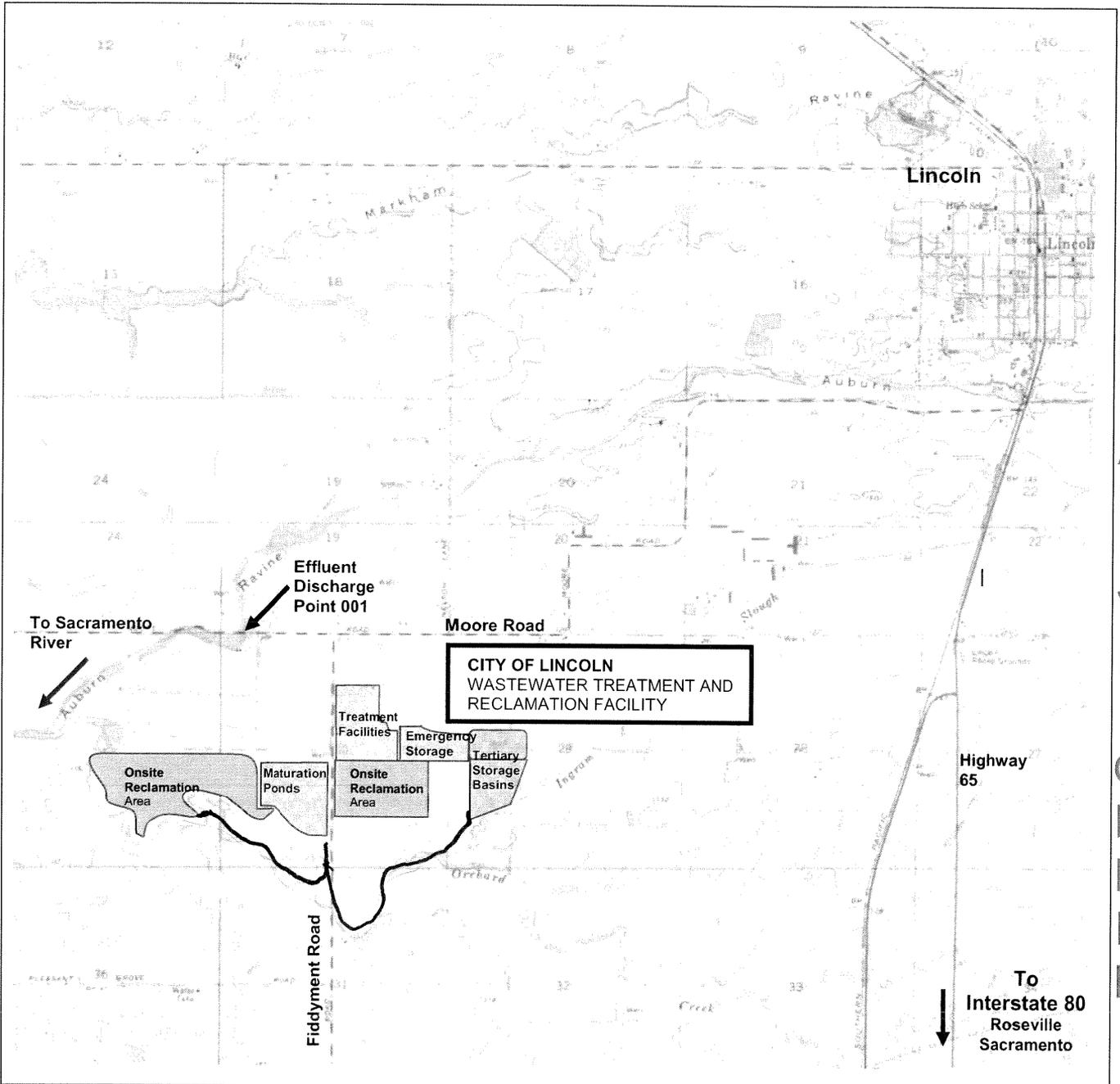
Sincerely,

ECO:LOGIC Engineering

A handwritten signature in black ink, appearing to read "Robert W. Emerick". The signature is written in a cursive style with a large, prominent initial "R".

Robert W. Emerick, Ph.D., P.E.  
Principal

**ATTACHMENT B – MAP**



TENTATIVE ORDER

LINCOLN AND ROSEVILLE  
 U.S.G.S TOPOGRAPHIC MAPS  
 7.5 MINUTE QUADRANGLE  
 T12N, R6E, Sections 29 and 30  
 T12N, R5E, Section 26  
 Photorevised 1981  
 Not to scale

**CITY OF LINCOLN**  
**Wastewater Treatment and Reclamation Facility**  
**PLACER COUNTY**

