



May 3, 2011

California Regional Water Quality Control Board
Central Valley Region - Redding Office
415 Knollcrest Drive, Suite 100
Redding, CA 96002

RE: TENTATIVE WASTE DISCHARGE REQUIREMENTS (NPDES NO. CA0078034) AND TIME SCHEDULE ORDER FOR CITY OF WILLOWS WASTEWATER TREATMENT PLANT GLENN COUNTY

Dear Mr. Greg Cash,

The City of Willows (City) appreciates the opportunity to comment on the tentative discharge requirements (NPDES NO. CA0078034) proposed 5 April 2011.

The City of Willows has voiced its concern over the new proposals as this will effectively require an outlay of several thousand dollars of rate payers money to rectify the process that has only been in place for three years.

The changes required would also most certainly require the City to seek additional funding sources that would be added to the loan repayment of 7.6 million that we borrowed to finance the new treatment facility, which also required us to raise rates by 100% to the users here in Willows in a three year step period.

As I have alerted the City Council that another round of rate hikes and more money would have to be borrowed to cover the new expenditures to basically do away with wet chemistry at the end of our process to assure that the water is safe for agricultural reuse, the irony is that we received a grant from the State for this very reason.

While we understand that new regulations will always be forth coming, the stipulations in our new permit are, in our opinion, not fitting to the area we live in and or the waters which we discharge into, that are strictly used for agricultural irrigation per Glenn Colusa Irrigation District regulations.

Please see that our letter is passed onto the Regional Board so that we may be heard in this matter at the next scheduled meeting which they will consider the adoption of our new permit.

The City's comments and recommendations are presented to complement and clarify certain discharge regulations proposed in the tentative permit.



Element 1: Municipal and Domestic Supply Beneficial Use (MUN Use):

According to *The Water Quality Control Plan (Basin Plan) for the California Regional Water Quality Control Board Central Valley Region (4th Edition – Revised September 2009) with Approved Amendments:*

"In making any exemptions to the beneficial use designation of MUN, the Regional Board will apply the exceptions listed in Resolution 88-63 (Appendix Item 8)."

State Water Board Resolution No. 88-63, Sources of Drinking Water Policy states:

"THEREFORE BE IT RESOLVED: All surface and ground waters of the State are considered to be suitable, or potentially suitable, for municipal or domestic water supply and should be so designated by the Regional Boards with the exception of:

- 2. Surface waters where:*
 - a. The water is in systems designed or modified to collect or treat municipal or industrial wastewaters, process waters, mining wastewaters, or storm water runoff, provided that the discharge from such systems is monitored to assure compliance with all relevant water quality objectives as required by the Regional Boards; or,*
 - b. The water is in systems designed or modified for the primary purpose of conveying or holding agricultural drainage waters, provided that the discharge from such systems is monitored to assure compliance with all relevant water quality objectives as required by the Regional Boards."*

Comments & Recommendations:

Agricultural Drain C (into which, treated municipal wastewater effluent is discharged at D-001) is a system designed for the primary purpose of conveying or holding agricultural drainage waters.

Therefore, it is the City's recommendation that, all discharges to Agricultural Drain C be exempt from the beneficial use, MUN, and all limitations and restrictions associated with said beneficial use (including, but not limited to: Dichlorobromomethane, Dibromochloromethane, and Nitrate limitations).

Element 2: Electrical Conductivity (EC):



According to the tentative discharge requirements (NPDES NO. CA0078034):

"The Basin Plan does not contain a specific EC water quality objective for the Colusa Basin Drain." (II.F.IV.3.v.1 page 93, Fact Sheet page F-27)

Comments & Recommendations:

However, an interim EC limit of 826 umhos/cm for EC is proposed anyway. This interim performance-based effluent limitation was derived using the 99.9 percentile of the rolling 12-month average effluent concentration from January 2006 through June 2010.

The current, rolling 12-month average effluent EC concentration is 840 umhos/cm. Because the discharger is unable to meet the newly proposed limitation, the EC discharge requirements should be moved to a Time Schedule Order (TSO).

The City of Willows appreciates the opportunity to comment and participate in the tentative permit scoping efforts. If you have any questions, please do not hesitate to contact me at (530) 934-7041.

Sincerely,

Greg Tyhurst
City of Willows, Public Works Director