



December 9, 2011

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Attention: Robin Merod, Water Resources Control Engineer

Subject: City of Hughson (City) Wastewater Treatment Plant (WWTP) Waste Discharge Requirements (WDRs) comments

Dear Dr. Merod:

The City greatly appreciates this opportunity to comment on the draft of the WDRs. The City thanks the Regional Water Quality Control Board (RWQCB) for the time and effort spent to date. The City has some minor comments on the draft WDRs and appreciates the RWQCB's attention to these items. The comments are as follows:

1. The table in item 49 c. appears to contain some incorrect data. The range for the nitrates in S-1 appears to be incorrect. There are no data points that go as high as 47 mg/l. Both the average and range of TDS values appears to be off for the upstream data point as well. In discussions with the RWQCB it became apparent that data from the spring site was included as upstream river data. However, as noted in the quarterly groundwater monitoring reports, this sampling location is representative of groundwater quality and not surface water quality. Therefore, the City requests that the data for the spring be removed from the values shown in the table.
2. Page 19, F. Provisions, 3), last sentence. The City requests that this sentence be modified as follows by including the underlined text: "The report shall describe the development of the new background groundwater monitoring well and if rehabilitation is not foreseen, then destruction of MW-10."
3. Information Sheet, page 2, Groundwater Conditions, last sentence. It appears that some wording is missing from this sentence. The City suggests the following underlined text be added: "If MW-10 goes dry for an extended period, the Order requires the Discharger to either replace MW-10 or justify why replacement is not needed."

The City would like to thank again the RWQCB for the opportunity to comment on the draft copy of the WDRs for the new WWTP. The City is available to discuss these comments and the contents of this letter if so desired.

Dr. Robin Merod
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Sincerely,

CITY OF HUGHSON

A handwritten signature in black ink, appearing to read "Thom Clark". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thom Clark
Director of Public Works

Cc: Stephen Caswell, Carollo Engineers
Robert Gillette, Carollo Engineers