

Gotham, Stacy@Waterboards

Sent: Thursday, May 02, 2013 5:35 PM
To: Gotham, Stacy@Waterboards
Subject: RE: Comments on the Stillwater Wastewater TP Tentative WDRs

Stacy,

Thank you for discussing the final comments submitted by the City regarding the tentative WDRs for the Stillwater WTP. In follow-up to our discussion, I'm providing the following to further clarify the City's position on the tentative WDRs:

- 7-day median effluent limitation for total coliform- After further review of effluent data and of the facility's sampling and testing program, the City of Redding no longer contests the inclusion of a 7-day median for effluent total coliform. The change in compliance period will result in significant additional cost and an increased risk of non-compliance, but the City is confident that the proposed limits for total coliform will be consistently met.
- New RSW-001 Monitoring Location- The City of Redding continues to harbor concern regarding personnel safety during receiving water sampling at the current RSW-001 location, and whether the location is representative of upstream conditions is still a question that needs addressed. Our office is of the opinion that the revised RSW-001 location proposed by the City earlier this year continues to represent the best potential location to address these two concerns, but City staff understands further discussion will be necessary on this issue. If your office were to commit to further discussion on this issue, the City of Redding would be willing to withhold further discussion at this time and withdraw its request for inclusion of a revised RSW-001 location in the tentative WDRs.

Please feel free to call my office if any clarification is needed regarding these two items.

Thank you,

Josh Keener
Wastewater Compliance Coordinator
City of Redding