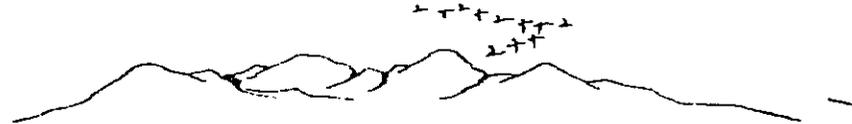


CITY of YUBA CITY



Public Works Department - Utilities Division

302 BURNS DR • YUBA CITY, CA 95991 • (530) 822-4639 FAX (530) 822-4773

June 19, 2013

Gayleen Perreira
Senior Engineer
California Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

SUBJECT: Comments on Preliminary Draft of the proposed National Pollution Discharge Elimination System (NPDES) Permit No. CA0079260 – Waste Discharge Requirements for the City of Yuba City Wastewater Treatment Facility, Sutter County.

Dear Gayleen:

The City of Yuba City (City) staff wish to extend our thanks to you and your staff for working with us through the permit development process to discuss policy and technical issues. We have organized comments on the Tentative Order (TO) into two sections - specific comments where we discuss issues to be resolved and editorial comments which are generally minor corrections.

Specific Comments

Manganese Effluent Limitation

In the 2007 Permit the manganese effluent limitation is specified as 200 µg/L as an annual average. In the Fact Sheet (p. 50 and 51), the TO calculates the water quality based effluent limitation considering dilution is 2,702 µg/L as an annual average. The Fact Sheet also noted the maximum annual average measured between January 2008 and April 2012 to be 97 µg/L. However, without consideration of potential effluent variability, the effluent limitation is set to 100 µg/L as an annual average in the TO citing antidegradation as the necessary mechanism for the reduction. The City maintains a local limits program. Reducing the manganese effluent limitation will require a commensurate reduction in the manganese local limits applied to industries in the service area. An unnecessary reduction of the effluent limitation will change industrial permit limits that may result in unnecessary modification to local industry operations.

The City is aware of the collaboration between the Central Valley Regional Water Quality Board (Central Valley Regional Board) and the Central Valley Clean Water Association (CVCWA) specifically to determine the best procedure to develop appropriate limitation of constituents when

there is dilution available. The City supports the approach where water quality limitation are calculated with available dilution are used as effluent limitations, while simultaneously developing performance based trigger levels where, if exceeded, the discharger would perform actions to determine if effluent levels are truly rising and if additional action is necessary. A similar approach is used in the Ocean Plan where high levels of dilution are typically available.

For the TO, the City requests the manganese effluent limitation be maintained at the 200 µg/L annual average. The City will be able to maintain the current local limits if the manganese limitation remains unchanged. The requested limitation is well under 10% of the level necessary to protect water quality and because it maintains the level in the 2007 Permit, therefore should be found to comply with antidegradation.

Additionally, the City requests the addition of a reopener to modify effluent limitations in the TO when a procedure is agreed upon between the Central Valley Regional Board and CVCWA as to the calculation of effluent limitations and potential triggers where there is dilution available.

Total Coliform Limitation

The method of calculation for the total coliform 7-day median was changed in the TO from how the value was historically calculated. In the 2007 Permit the calculation method is as follows:

Total Coliform Organisms Effluent Limitations (Section IV.A.1.h). For each day that an effluent sample is collected and analyzed for total coliform organisms, the 7-day median shall be determined by calculating the median concentration of total coliform bacteria in the effluent utilizing the bacteriological results of the last 7 samples. If the 7-day median of total coliform organisms exceeds a most probable number (MPN) of 23 per 100 milliliters, the Discharger will be considered out of compliance for that parameter for that 1 day only within the reporting period.

The method in the TO is as follows:

Total Coliform Organisms Effluent Limitations (Section IV.A.1.f). For each day that an effluent sample is collected and analyzed for total coliform organisms, the 7-day median shall be determined by calculating the median concentration of total coliform bacteria in the effluent utilizing the bacteriological results of the last 7 days. For example, if a sample is collected on a Wednesday, the result from that sampling event and all results from the previous 6 days (i.e., Tuesday, Monday, Sunday, Saturday, Friday, and Thursday) are used to calculate the 7-day median. If the 7-day median of total coliform organisms exceeds a most probable number (MPN) of 23 per 100 milliliters, the Discharger will be considered out of compliance.

For consistency with historic practice, the City requests maintaining the 7-day median coliform calculation method as specified in the 2007 Permit where the previous 7 samples are used to calculate 7-day median.

Editorial Comments

Section VI.C.2.a (pages 20 and 21)

- The numbering of the subheaders contains two "i". Please renumber as appropriate. Monitoring and Reporting Program, Table E-2 (pages E-4 through E-5)
- The footnote numbering is not correct. For electrical conductivity, the Grab has a footnote of 6, however Table E-2 has no footnote 6. Please check to see if it should be footnote 5. Monitoring and Reporting Program, Table E-3, footnote 7 (pages E-5 through E-7)
- For priority pollutant constituents with effluent limitations, detection limits shall be below the effluent limitations. If the lowest minimum level (ML) published in Appendix 4 of the

Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (State Implementation Plan or SIP) is not below the effluent limitation, the ~~detection~~ reporting limit shall be the lowest ML per Section 2.4.2 of the SIP. For priority pollutant constituents without effluent limitations, the ~~detection~~ reporting limits shall be equal to or less than the lowest ML published in Appendix 4 of the SIP.

Thank you for the opportunity to provide these comments on the Tentative Order. Please, do not hesitate to contact (530) 822-7695 to discuss the comments in particular or the Order in general.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Paulucci". The signature is fluid and cursive, with a large initial "M" and "P".

Michael L. Paulucci
Deputy Public Works Directory - Wastewater