

From: John Mulligan <jmulligan@ci.sanger.ca.us>  
Sent: Tuesday, December 24, 2013 10:25 AM  
To: Harvey, Dale@Waterboards  
Cc: Amando Garza; Josh Rogers; Ron Franz; Brian Haddix  
Subject: RE: City fo Sanger TWDR Comments

Dale,

Good morning.

Per our conversation, I am emailing you to amend the letter sent on December 23, 2013 addressing the City of Sanger's comments and concerns regarding the TWDR dated November 14, 2013. We discussed that the RWQCB needs to have a stated timeline for the provision F.19 addressing the actual effluent nitrate levels and the methods to reduce the levels to protect the groundwater. The City has stated that the current growth and economic factors make it difficult to address the nitrate levels at the plant due to the extensive cost of either building a new treatment facility or retrofitting the existing plant. The other commonly utilized method utilized in the region is a combination of eliminating the percolation ponds and capturing the effluent in lined ponds to be used for agronomic application. While this method is also quite costly, the City sees this method of mitigation more probable.

The letter that was submitted by the City in Comment #2 discusses the concerns with the TWDR but does not discuss timelines directly. The timelines in the TWDR of 6 months to submit a work plan, 1 year to start the plan implementation, and the submission of a final report demonstrating complete implementation of the approved work plan and schedule within 2 years is far too aggressive and not reasonable. While the City is certainly concerned with effluent levels and the need to better protect the groundwater quality, the full implementation of a work plan will take more time and resources. The City therefore is requesting that the timelines stated be extended to a more reasonable timeframe to allow

for a comprehensive approach that is more realistic and will better assure that the mitigation measures are complete. The City would like to request that the three timelines stated of 6 months, 1 year, and 2 years be modified to 18 months, 3 years, and 6 years for work plan submittal, beginning implementation, and completion, respectively.

The actual process of mitigation is long and costly. The City of Sanger is an economically disadvantaged community and any capital improvements will require rate increases and other creative funding sources. In the current political arena, rate increases are very difficult. The City appreciate your consideration and realizes that we must all work together to find solutions to these issue. Please let me know if you need further information or clarification. I look forward to your comments as we move this process toward the Board's approval in February 2014.

Respectfully,

John Mulligan  
Public Works Director  
City of Sanger

From: Harvey, Dale@Waterboards [mailto:Dale.Harvey@waterboards.ca.gov]  
Sent: Tuesday, December 24, 2013 7:44 AM  
To: John Mulligan  
Subject: RE: City fo Sanger TWDR Comments

John, please give me a call when you can.

W. Dale Harvey, P.E., MsCE  
Senior Engineer  
(559) 445-6190  
dharvey@waterboards.ca.gov

From: John Mulligan [mailto:jmulligan@ci.sanger.ca.us]  
Sent: Monday, December 23, 2013 4:23 PM  
To: Harvey, Dale@Waterboards; Pyle, Jeffrey@Waterboards  
Cc: Josh Rogers; Ron Franz; Amando Garza  
Subject: City fo Sanger TWDR Comments

Mr. Harvey,

Good afternoon.

Please find the City of Sanger's comments and concerns for the Tentative Waste Discharge Requirements issued on November 14, 2013. We certainly appreciate all your assistance up to this point and look forward to working with you and your staff to finalizing the document and presenting to the Board. We also appreciate the 1 week extension you granted the City to submit this comprehensive document. Please review and feel free to contact me as needed. I have placed the Original in the mail to your attention.

Respectfully,

John Mulligan  
Public Works Director  
City of Sanger  
(559) 304-1590