



City of Clovis Public Utilities Department

155 N. Sunnyside Avenue, Clovis, CA 93611 (559) 324-2600

December 23, 2013

Mr. Matthew S. Scroggins
Regional Water Quality Control Board
Central Valley Region
1685 E Street
Fresno, CA 93706

Subject: City of Clovis Sewage Treatment and Water Reuse Facility, Tentative
Order No. R5-2014-XXXX, NPDES Permit NO. CA0085235

Dear Mr. Scroggins:

Thank you for the opportunity to review this tentative permit. On Page 14, Section IV.C. Recycling Specifications – Discharge Point REC-001, several of these items appear to be directed at lower quality recycled water than the disinfected tertiary recycled water provided at this facility and some are redundant. As such it is appropriate that they be eliminated or modified as follows in accordance with Title 22, CCR, Section 60310:

5. Should be revised to read "All use areas where recycled water is used that are accessible to the public shall be posted with signs that are visible to the public, in a size no less than 4 inches high by 8 inches wide, that include the following wording : "RECYCLED WATER - DO NOT DRINK, AGUA DE DESPERDICIO RECLAMADA – NO TOME". Each sign shall display an international symbol similar to that shown in Attachment J."
13. Should be eliminated as it is redundant to item 6 and item 12.
14. Should be eliminated as it is redundant to item 6 and item 12.
16. Should be eliminated as it is not pertinent to disinfected tertiary recycled water and is redundant with item 12.
17. Should be revised to read "Recycled water use areas shall be managed to prevent breeding of mosquitos."

18. Should be eliminated as it is not pertinent to disinfected tertiary recycled water.

19. Should be eliminated as it is not pertinent to disinfected tertiary recycled water.

20. Should be eliminated as it is redundant to item 12.

On page 19, V.A.1.p., refers to "R-003U" and to be consistent should be referred to as "RSW-003U".

On Table E-9, the reporting period for the Acute and Chronic WET Tests has been changed to within 30 days following completion of the tests. This will likely mean that these reports will have to be sent separately and before the monthly SMR. We request that this reporting be consistent with other quarterly monitoring to reduce the variability of due dates.

Thanks again for the opportunity to review this tentative permit and should you have any questions or comments please contact me at your earliest convenience. I may be reached at (559) 324-2607.

Sincerely,



Lisa Koehn
Assistant Public Utilities Director