



CITY OF WILLIAMS
Department of Public Works
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April 25, 2014

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

Attention: Ms. Elizabeth Thayer

Reference: City of Williams NPDES permit No. CA0077933 Tentative Draft Comments

Dear Ms. Thayer,

Please accept this letter containing comments regarding the Tentative Draft City of Williams NPDES permit renewal (CA0077933).

Comment 1

EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS IV.A.1.A: The average monthly mass limitation should be 42 lbs/day. It is currently listed as 40 lbs/day.

$(10 \text{ mg/L})(0.5 \text{ MGD})(8.34) = 41.7 \text{ lbs/day}$. At two significant digits, the limitation becomes 42 lbs/day.

Comment 2

EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS IV.A.1.D: The total coliform effluent limitations should reference compliance at Monitoring Location UVS-002. The Effluent Limitations described by the Order state that compliance is required at Monitoring Location EFF-001 (IV.A.1) whereas the Monitoring and Reporting Program describe monitoring at UVS-002.

The Monitoring and Reporting Program location is accurate. We are suggesting that ambiguity be removed from the permit.

Comment 3

RECEIVING WATER LIMITATIONS V.A.17: A one-month averaging period should be applicable when the wastewater is compliant with Filtration System Operating Specifications C.2.4.a., not tied to treating to a tertiary level or equivalent.

The receiving water turbidity limitation is not virus based. Reference to “Title 22” is a reference to virus removal. It is clearer and more appropriate to make reference to the filtration objectives directly.

Comment 4

GROUNDWATER LIMITATION B.1: The City request elimination of Paragraph 1. Paragraph 1 is inconsistent with Groundwater Limitation B. Groundwater Limitation B states that the discharge shall not cause the groundwater to exceed water quality objectives, unreasonably affect beneficial uses, or cause conditions of nuisance. This requirement is sufficient to regulate the discharge.

The Paragraph 1 we propose eliminating describes a more stringent limitation; waste constituents are not be in concentrations in excess of natural background quality. There are relatively benign constituents expected in wastewater that may be then become detectable in groundwater that don't cause water quality objectives to be violated, affect beneficial uses, or create nuisance. Caffeine and flame retardants are two examples of contaminants that might be detectable in groundwater that are not naturally occurring but would not affect beneficial uses or violate the most stringent of possible regulatory criteria.

Comment 5

PROVISIONS VI.C.2.C (SURVEY AND EVALUATION OF INFLUENT SALINITY SOURCES): We request elimination or vast revision of this requirement. The current limitation states that we must list, survey, and evaluate all local users of the facility. It does not distinguish between commercial, industrial, or residential users or allow the City to propose a workplan that clarifies intent. At this time, we interpret this requirement as requiring us to list every residential, commercial, and industrial discharger, monitor each individually, and report our findings. We believe this violates privacy expectations for residential users, is unnecessarily expensive for commercial users, and should be limited to industrial users only. Adding an intermediate submittal deadline where we propose a workplan that allows us to clarify Regional Board intent and refine study objectives may be appropriate.

Comment 6

ATTACHMENT E – RECEIVING WATER MONITORING REQUIREMENTS VIII.A.1: Remove or greatly reduce the monitoring required for fecal coliform organisms at Salt Creek Monitoring Locations RSW-001 and RSW-002. The facility is producing an essentially pathogen free effluent, with total coliform regulated at 2.2 MPN per 100 mL as a 7-day median, no more than 23 MPN/100 mL more than once in a 30-day period, and never to exceed 240 MPN/100 mL at any time. The

receiving water limit allows fecal coliform, a subgroup of total coliform, to occur as high as 400 MPN 10-percent of the time. It is impossible for a compliant effluent to cause the receiving water to violate fecal coliform objectives, and the effluent and operation of the filter and UV disinfection system is already monitored to assure compliance. Monitoring for fecal coliform appears unjustified, yet unnecessarily incurs cost to the City (a recognized low income community).

Comment 7

REPORTING REQUIREMENTS X.D.6 (SALINITY EVALUATION AND MINIMIZATION PLAN): The reporting due dates described by Provisions VI.c.2.c (Survey and Evaluation of Influent Salinity Sources) and Provision VI.c.3.a (Salinity Evaluation and Minimization Plan) are 1 August 2015 and 1 March 2016, respectively. Attachment E (Monitoring and Reporting Program) describes submittal dates at 8 August 2015 and 8 May 2015, respectively. We request the Monitoring and Reporting Program due dates be modified to be consistent with the due dates described by the Provisions.

Thank you for consideration of these items. Please do not hesitate to contact either me at (530) 473-2519 or Yulya Borroum (Stantec) at (916)773-8100 if we can provide further assistance or clarification.

Regards,

City of Williams



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Cc: Yulya Borroum, Stantec