

**Central Valley Regional Water Quality Control Board  
Board Meeting – 16/17 April 2015**

**Response to Written Comments for  
City of Turlock  
Regional Water Quality Control Facility  
NPDES Permit Renewal (CA0078948)**

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The following are Central Valley Regional Water Quality Control Board (Central Valley Water Board) staff responses to comments submitted by interested parties regarding the tentative Waste Discharge Requirements (NPDES Permit No. CA0078948) renewal for the City of Turlock (Discharger), Regional Water Quality Control Facility (Facility), Stanislaus County.

The tentative NPDES Permit (tentative Order) was issued for a 30-day public comment period on 21 January 2015 with comments due by 27 February 2015. The Central Valley Water Board received public comments regarding the tentative Permit by the due date from the Discharger. Some changes were made to the proposed Permit based on public comments received.

The submitted comments were accepted into the record, and are summarized below, followed by Central Valley Water Board staff responses.

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### **City of Turlock (Discharger)**

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#### **Discharger Comment No. 1. Effluent Limitations and Discharge Prohibitions. Section IV.A.1.f.**

Effluent Limitation and Discharge Prohibitions Section IV.A.1.f contains a proposed annual average effluent limitation for Electrical Conductivity (EC) of 1,100 µmhos/cm. The Discharger requested that the proposed annual average effluent limitation for EC of 1,100 µmhos/cm be increased to 1,250 µmhos/cm to consider the effects of increased water conservation efforts and drought conditions on influent and effluent flows that result in EC concentration increases. The Discharger submitted a report titled "Water Conservation and Drought Effects on City of Turlock Performance-Based Electrical Conductivity Effluent Limitations" (Report) which supports the request for the change of the EC effluent limitation.

**Response.** Based on the information presented in the Discharger's report, Central Valley Water Board staff concurs that an increase of the proposed performance-based effluent limitation is reasonable considering the effects of water conservation and potential drought effects on influent and effluent EC concentrations at the Facility. The proposed permit has been modified accordingly to reflect the proposed performance-based annual average effluent limitation for EC of 1,250 µmhos/cm.

#### **Comment No. 3. Surface Water Limitations. Section V.A.1. Bacteria.**

Receiving water monitoring was removed for fecal coliform in the proposed permit. Therefore, the Discharger questioned the need for the Bacteria (i.e., fecal coliform) receiving water limitation.

**Response.** The receiving water limitations for bacteria in Section V.A.1 are based on the Basin Plan and have not been removed from the proposed Order. Receiving water monitoring for fecal coliform has been removed, because a high level of disinfection is required and compliance will be determined through effluent total coliform organisms monitoring.

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**Comment No. 4. Surface Water Limitations. Section V.A.5 Dissolved Oxygen.**

Surface Receiving Water Limitations Section V.A.5 includes a receiving water limitation stating that the discharge shall not cause the following pertaining to Dissolved Oxygen in the San Joaquin River:

- a. The monthly median of the mean daily dissolved oxygen concentration to fall below 85 percent of saturation in the main water mass;
- b. The 95 percentile dissolved oxygen concentration to fall below 75 percent of saturation; nor
- c. The dissolved oxygen concentration to be reduced below 7.0 mg/L at any time.

The Discharger has requested clarification on how compliance with these receiving water limitations will be determined.

**Response.** The dissolved oxygen receiving surface water limitation is based on the Basin Plan's dissolved oxygen water quality objective and contains three parts, as shown above. The Facility provides a high level of treatment including tertiary filtration and nitrification, which results in minimal dissolved oxygen impacts in the receiving water. Consequently, weekly receiving water monitoring is required in the proposed Order and is sufficient to evaluate the impacts of the discharge and compliance with the proposed Order. The weekly monitoring data will be used to determine compliance with the third part of the dissolved oxygen receiving water limitation, and will be assessed, at minimum, using effluent and receiving water dissolved oxygen data to ensure the discharge does not cause the dissolved oxygen concentrations in the receiving water to be reduced below 7 mg/L at any time.

The Monitoring and Reporting Program (Attachment E) Section X.B.7.g has been modified to clarify the reporting requirements for dissolved oxygen data. See changes in underline/strikeout format below:

- g. Dissolved Oxygen Receiving Water Limitations.** The Discharger shall calculate ~~and~~ report monthly in the self-monitoring report: ~~i) the dissolved oxygen concentrations measured in the effluent (EFF-001) and in the receiving water (RSW-001 and RSW-002), ii) the percent of saturation in the main water mass, and iii) the 95<sup>th</sup> percentile dissolved oxygen concentration.~~

In addition, the following compliance determination language has been added to section VII. of the Limitations and Discharge Requirements.

- M. Dissolved Oxygen Receiving Water Limitation (Section V.A.5.a-c).** The Facility provides a high level of treatment including tertiary filtration and nitrification, which results in minimal dissolved oxygen impacts in the receiving water. Weekly receiving water monitoring is required in the Monitoring and Reporting Program (Attachment E) and is sufficient to evaluate the impacts of the discharge and compliance with this Order. Weekly receiving water monitoring data, measured at monitoring locations RSW-001 and RSW-002, will be used to determine compliance with part "c" of the dissolved oxygen receiving water limitation to

ensure the discharge does not cause the dissolved oxygen concentrations in the San Joaquin River to be reduced below 7 mg/L at any time. However, should more frequent dissolved oxygen and temperature receiving water monitoring be conducted, Central Valley Water Board staff may evaluate compliance with parts “a” and “b”.

**Discharger Comment No. 6. Delta Regional Monitoring Program.** The Discharger has requested clarification on the voluntary nature of participation in the Delta Regional Monitoring Program. Furthermore, the Discharger suggests the option of a San Joaquin River Regional Monitoring Program as a possible partner organization to the Delta Regional Monitoring Program or future option for the Discharger.

**Response.** The Delta Regional Monitoring Program (RMP) is completely voluntary at this time. However, the Central Valley Water Board encourages participation in a regional monitoring program because it provides coordinated monitoring and assessment of water quality. This is a more effective and efficient means to evaluate and resolve water quality issues on a watershed basis. Currently, the Delta RMP is the nearest regional monitoring program for the Facility discharge. The Central Valley Water Board supports the development of additional regional monitoring programs that operate in parallel with the Delta RMP, so in the future a regional monitoring program for the Lower San Joaquin River may be more appropriate for the Facility. Clarifying language has been added to the proposed Order in this regard.

**Discharger Comments No. 2, 5, and 7 – 20. Minor Clarifications and Edits.**

The Discharger requested other minor clarifications and editorial changes to the proposed Permit. Central Valley Water Board staff reviewed and agrees with the Discharger’s suggested changes and has modified the proposed permit accordingly.