

Tentative Draft Order R5-2016-XXXX Waste Discharge Requirements for the Cities of Turlock and Modesto
Comments by US Bureau of Reclamation

Comment #	Page Number	Page Printed #	Section #	Beginning of Paragraph	Referenced Text	Comment	Commenter Name	Comment Date
1	6	6	IV. A.1. i.	Final Effluent Limitations - City of Turlock	Electrical Conductivity @ 25° C.	The calendar year annual average electrical conductivity does not state a sampling interval to create the annual average. How frequently must samples be taken to create the annual average? Reclamation recommends a monthly or more frequent sample interval.	M. Mosley	12/21/2015
2	7	7	IV. A.2.h.	Final Effluent Limitations - City of Modesto WQCF	Electrical Conductivity @ 25° C.	The calendar year annual average electrical conductivity does not state a sampling interval to create the annual average. How frequently must samples be taken to create the annual average? Reclamation recommends a monthly or more frequent sample interval.	M. Mosley	12/21/2015
3	8	8	V.A.	Limitations and Discharge Requirements	<i>Discharges from the North Valley Regional Recycled Water Program Joint Outfall (Discharge Point 002) shall not cause the following in the Delta-Mendota Canal...</i>	Please explain why this monitoring is not required in the receiving water downstream of the discharge (RSW-002).	M. Eacock	12/23/2015
4	19	19	VI.C.6.a	Limitations and Discharge Requirements	<i>.... Wastewater discharged from the Facilities to the North Valley Regional Recycled Water Program Joint Outfall shall be oxidized, coagulated, filtered, and adequately disinfected pursuant to the State Water Board, Division of Drinking Water (DDW) reclamation criteria, CCR, Title 22, division 4, chapter 3, (Title 22), or equivalent.</i>	This conforms with Reclamation's guidelines for accepting non-project water in the DMC.	M. Eacock	12/23/2015
5	E-2	42	I.	Attachment E - Monitoring and Reporting Program	The Code of Federal Regulations (40 C.F.R. § 122.48) requires that all NPDES permits specify monitoring and reporting requirements. Water Code sections 13267 and 13383 also authorize the Central Valley Water Board to require technical and monitoring reports.	This permit does not have WO standards or a section to address constituents of emerging concern (CEC). How will the discharger monitor and report CEC in accordance with recycled water regulatory requirements? Will this information be made public?	M. Mosley	12/21/2015
6	E-2	43	I.E.	Attachment E - Monitoring and Reporting Program	<i>Monitoring results, including noncompliance, shall be reported at intervals and in a manner specified in this Monitoring and Reporting Program.</i>	We request that all monitoring reports for the WDR be shared with Reclamation and the SLDMWA.	M. Eacock	12/23/2015
7	E-3	44	Table E-1	Attachment E - Monitoring and Reporting Program	Table E-1. Monitoring Station Locations	For RSW-001, we recommend the farm bridge located at DMC Milepost 36.81, and for RSW-002, we recommend the farm bridges at DMC Mileposts 38.14 or 41.49.	M. Eacock	12/23/2015

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8	E-4	45	IV.A.1.	Monitoring Location EFF-002	When discharging to the North Valley Regional Recycled Water Program Joint Outfall the Discharger shall monitor treated effluent at Monitoring Location EFF-002 as follows.	Table E-3 for monitoring location EFF-002, which is the final outfall into the Delta-Mendota Canal, lists the constituents to be monitored. Reclamation requests the addition of Electrical conductivity to Table E.3. The justification for this comment is the EC impairment and TMDL already approved for the San Joaquin River watershed. Reclamation must keep track of and manage EC in the DMC.	M. Mosley	12/21/2015
9	E-7	48	V.A.2	Attachment E - Monitoring and Reporting Program	<i>A. Acute Toxicity Testing. When discharging to the North Valley Regional Recycled Water Program Joint Outfall the City of Turlock RWQCF and City of Modesto WQCF shall separately conduct acute toxicity testing to determine whether the effluent is contributing acute toxicity to the receiving water in accordance with the following acute toxicity testing requirements..... a. The effluent samples from the City of Turlock RWQCF shall be taken at Monitoring Location EFF-001A. b. The effluent samples from the City of Modesto WQCF shall be taken at Monitoring Location EFF-001B.</i>	Please explain why no acute toxicity testing required in the receiving water.	M. Eacock	12/23/2015
10	E-8	49	V.B.2	Attachment E - Monitoring and Reporting Program	<i>2. Sample Types - Effluent samples shall be flow proportional 24-hour composites and shall be representative of the volume and quality of the discharge..... c. The receiving water control shall be a grab sample obtained from Monitoring Location RSW-001.</i>	Please explain why no chronic toxicity testing is required downstream of the discharge into the DMC.	M. Eacock	12/23/2015
11	E-13	54	IX.B.1.	Attachment E - Monitoring and Reporting Program	<i>Monthly Monitoring. Monthly samples shall be collected from the effluent (Monitoring Locations EFF-001A and EFF-001B) and upstream receiving water (Monitoring Location RSW-001) and analyzed for the constituents listed in Table E-8....</i>	Probably meant Table E-9. Please explain why no monitoring is required for actual water being discharged (EFF-002) nor the receiving water downstream of discharge (RSW-002).	M. Eacock	12/23/2015
12	E-13	54	IX.B.1.	Attachment E - Monitoring and Reporting Program	<i>The Discharger may cease monitoring for the following constituents if they are not detected in the first 3 monthly samples: total cyanide, asbestos, dioxin, and EPA Method 608 polychlorinated biphenyls (PCB's) and chlorinated pesticides.</i>	We recommend that the complete Table E-9 list be measured monthly during the irrigation season (April - August), then reduce the list to a select constituents (metals, any detectable pesticides, etc.)	M. Eacock	12/23/2015
13	E-13	54	Table E-9	Attachment E - Monitoring and Reporting Program	<i>Table E-9. Effluent Characterization Monitoring</i>	Reclamation has measured many of these parameters in the canal and will share this data with the Discharger.	M. Eacock	12/23/2015

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14	E-13	54	Table E-9	Attachment E - Monitoring and Reporting Program	<i>Maximum Reporting Level</i>	Please define this term. Please explain why there are no Maximum Contaminant Level or water quality objectives for these parameters.	M. Eacock	12/23/2015
15	E-17	58	X.B	Attachment E - Monitoring and Reporting Program	Self-Monitoring reports	We request that all monitoring reports for the WDR be shared with Reclamation and the SLDMWA.	M. Eacock	12/23/2015
16	E-20	61	X.C.1.	Discharge Monitoring Reports	<i>The Discharger shall electronically submit DMR's using the State Water Board's California Integrated Water Quality System...</i>	Will the public be able to access these monthly DMR reports? Reclamation requests access to the monthly DMR and all other water quality reports.	M. Mosley	12/21/2015
17	E-21	63	X.D.1	Attachment E - Monitoring and Reporting Program	Special Study Reports and Progress Reports	We request that all monitoring reports for the WDR be shared with Reclamation and the SLDMWA.	M. Eacock	12/23/2015
18	F-15	78	IV.C.2.b.	Attachment F - Fact Sheet	<i>The ambient background data used for both RPA's was based on two samples for priority pollutants collected in the Delta-Mendota Canal on 30 September 2014 and 14 October 2014.</i>	Reclamation has extensive flow and water quality data for the DMC headworks that will be available to the discharger. Real-time EC data for DMC Headworks is available from CDEC (Station = DMC).	M. Eacock	12/23/2015
19	F-16	79	IV.C.2.c.i	Attachment F - Fact Sheet	<i>Based on flow data at Jones Pumping Plant from years 1994 through 2013, the harmonic mean flow of the Delta-Mendota Canal was 2,153 cfs.</i>	Reclamation can provide the Discharger with historical and current flow data. The volume of the pool above Check 7 is 590 acre-feet.	M. Eacock	12/23/2015
20	F-28	91	Figure F-1	Attachment F - Fact Sheet	<i>Observed Downstream Receiving Water hardness Concentrations for January 2005 - June 2015</i>	Please provide a citation for the source of this data.	M. Eacock	12/23/2015
21	F-32	95	IV.C.3.a.i.(b)	Attachment F - Fact Sheet	<i>The maximum ambient background concentration for selenium in the Delta-Mendota Canal was an estimated concentration of 0.72 ug/L, based on 2 samples collected by the discharger in October 2014.</i>	The concentration of selenium in this portion of the DMC is typically less than 0.4 ppb, based on daily composite measurements of selenium by Reclamation at the DMC Headworks and Check 13.	M. Eacock	12/23/2015
22	F-85	148	VII.D.1.a	Attachment F - Fact Sheet	<i>This Order allows the Discharger to elect to participate in the Delta Regional Monitoring Program in lieu of conducting all or part of the individual receiving water monitoring required in the Monitoring and Reporting Program</i>	Receiving water should be monitored.	M. Eacock	12/23/2015

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