



California Regional Water Quality Control Board Central Valley Region

Karl E. Longley, ScD, PE, Chair



Arnold
Schwarzenegger
Governor

Linda S. Adams
Secretary for
Environmental Protection

Fresno Branch Office
1685 E Street, Fresno, California 93706
(559) 445-5116 • Fax (559) 445-5910
<http://www.waterboards.ca.gov/centralvalley>

5 June 2007

TO: SEE ATTACHED LIST

TENTATIVE WASTE DISCHARGE REQUIREMENTS (TWDRs), VALLEY WASTE DISPOSAL COMPANY (VWDC) AND CAWELO WATER DISTRICT (CWD), KERN FRONT NO. 2 TREATMENT PLANT – CAWELO RESERVOIR B, KERN COUNTY

Enclosed are responses to CWD, VWCD and Vintage written comments on the subject TWDRs that were received on 15 May 2007 (dated 7 May 2007), 16 May 2007 (dated 14 May 2007), and 18 May 2007, and response to a verbal comment received from CWD on 18 May 2007. Also enclosed is an underline, strikeout version of the TWDRs that includes changes that will be considered by the Regional Water Board on 21/22 June 2007. The changes include some made by Regional Water Board staff and some made in response to CWD, VWCD and Vintage comments. Most significantly, we removed the footnote in Discharge Specification B.1 that would have allowed CWD to authorize exceptions to VWDC's annual average EC limit. We have also removed associated language in the Findings and Information Sheet and associated monitoring requirements from the Monitoring and Reporting Program. We modified the TWDRs as described because:

1. The study provided by the CWD provides the results of different snapshot scenarios, but does not quantify potential changes in the underlying aquifer's assimilative capacity over time. That is, the study does not account for year-to-year net gains and losses in assimilative capacity from wet and dry years or variations in salinity or volume of oilfield production water discharges.
2. As long as VWDC and the CWD comply with the limits in the TWDRs over the long term, the study establishes that the discharge will comply with the requirements of the *Water Quality Control Plan for the Tulare Lake Basin, Second Edition (1995)*.
3. The exception possibility as proposed could unreasonably penalize VWDC, Chevron USA, Inc., and the CWD during drought years, when larger volumes of oilfield production water are necessary to sustain agriculture within the CWD.

Staff also modified Discharge Specification B.1 to limit the discharge flow from VWDC to CWD Reservoir B to 4.3 mgd until VWDC provides the certification, required by new Provision No. 9, that it has installed another WEMCO treatment unit for a total treatment capacity of 7.4 mgd. After VWDC provides the certification and obtains the Executive Officer's written concurrence, it may discharge up to 7.4 mgd to CWD Reservoir B.

To conserve resources, paper copies of the TWDRs are being sent to the Discharger only. The new TWDRs and any additional information are available electronically on our web site (<http://www.waterboards.ca.gov/centralvalley/tentative/index.html>). If you have any questions

regarding the proposed TWDRs, or are without access to the internet and would like to request paper copies of the TWDRs, please contact me at (559) 445-6190.

W. DALE HARVEY
Senior WRC Engineer
RCE No. 55628

Enclosures: TWDRs (Discharger only)
Standard Provisions (Discharger only)

cc: Mr. Doug Eberhardt, (WTR-5), U.S. Environmental Protection Agency, San Francisco
U.S. Army Corps of Engineers, Sacramento
U.S. Fish and Wildlife Service, Sacramento
Ms. Frances McChesney, Office of Chief Counsel, State Water Resources Control Board, Sacramento (via email)
Mr. Philip Isorena, State Water Resources Control Board, Sacramento (via email)
Mr. Jim Pedri, Regional Water Quality Control Board, Sacramento (via email)
Mr. Jon Marshack, Regional Water Quality Control Board, Sacramento (via email)
Ms. Kiran Lanfranchi-Rizzardi, Regional Water Quality Control Board, Sacramento (via email)
Department of Health Services, Office of Drinking Water, Fresno
Department of Fish and Game, Region IV, Fresno
Department of Water Resources, San Joaquin District, Fresno
Kern County Environmental Health Department, Bakersfield
Kern County Planning Department, Bakersfield
Kern County Water Agency, Bakersfield
Mr. Florn Core, City of Bakersfield, Water Resources Department, Bakersfield
Mr. Dana Munn, North Kern Water Storage District, Bakersfield
Mr. Jim Waldron, Chevron USA, Inc., Bakersfield
Mr. Kent Varvel, Bureau of Land Management, Bakersfield
Mr. Bill Jennings, California Sportfishing Protection Alliance, Stockton
Ms. Lynne Johnson Carrithers, Klein Denatale Goldner LLP, Bakersfield

Mr. Larry S. Bright, VWDC
Mr. David Ansolabehere, CWD
Mr. Jim Robinson, Vintage

- 3 -

5 June 2007

Mr. Larry S. Bright
Valley Waste Disposal Company
7500 Meany Avenue
Bakersfield, CA 93308

Mr. David Ansolabehere
Cawelo Water District
17207 Industrial Farm
Bakersfield, CA 93308

Mr. Jim Robinson,
Vintage Productions California
9600 Ming Ave. Suite 300
Bakersfield, CA 93311