

February 12, 2008

**Public Works Department**

California Regional Water Quality Control Board  
Central Valley Region  
1685 E Street  
Fresno, California 93706-2020

Attention: Mr. Doug Patteson, P.E., Senior Water Resource Control Engineer

Subject: Tentative Waste Discharge Requirements and Rescission of Cease and Desist Order, City of Porterville, Tulare County, California

Dear Mr. Patteson:

Thank you for meeting with the City of Porterville (City) on February 6th regarding the tentative Waste Discharge Requirements (WDRs) that were issued on January 16, 2008. Attached to this letter are the City's formal comments in the form of red-lines on the tentative WDR, Monitoring and Reporting Program (MRP), and Information Sheet. We do not have any comments on the tentative Cease and Desist Order (CDO) rescission.

Our comments focus primarily on the need and justification to reduce the extensive amount of groundwater monitoring around the Wastewater Treatment Facility (WWTF), reclamation area, and percolation area. Our network of 23 monitor wells costs the City approximately \$10,000 per quarter for sampling and analysis. The extensive groundwater monitoring network constitutes a financial burden on the City and is no longer warranted.

Page 5 of the tentative Information Sheet states that discharges of domestic sewage and treated effluent can be treated and controlled to a degree that will not result in unreasonable degradation of groundwater. For this reason, these discharges are conditionally exempt from the monitoring requirements of Title 27, CCR, Section 20005 et seq (Title 27). Treatment and storage facilities for sludge that are part of the WWTF are also considered exempt, provided the facilities not result in a violation of any water quality objective.

By letter dated June 12, 2002, the Regional Board stated that Porterville could qualify for a future exemption from the groundwater monitoring requirements of Title 27, provided the City use reasonable agronomic rates and demonstrate that the effects of past excessive nitrogen application have naturally attenuated. Since 2002, Porterville has made considerable progress to: 1) expand the reclamation area; 2) utilize reasonable agronomic practices for effluent irrigation; 3) remove the buried sludge from the WWTF, and; 4) build new soil cement lined sludge drying beds with a demonstrated permeability less than  $1 \times 10^{-6}$  cm/sec.

In our comments to Findings No. 5 and 31-40, we discuss the monitor well data around the WWTF, reclamation area, and percolation area. Groundwater quality is variable in all locations. Several wells are of limited value, are dry, or are no longer appropriate. Groundwater salinity

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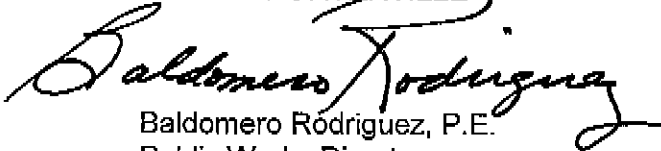
and nitrogen concentrations appear more reflective of historic agriculture rather than effluent irrigation or percolation. Based on these findings and the City's progress noted in the preceding paragraph, we conclude that the Porterville WWTF qualifies for the exemption from the groundwater monitoring requirements of Title 27 around the WWTF and reclamation area. We also conclude that only three monitor wells are needed in the vicinity of the percolation area for future monitoring. They are: MW-105, MW-107, and MW-109.

As stated in the tentative WDR, the constituents of concern for the Porterville WWTF are limited to salinity and nitrates. Provisions H.14, H.15, and H.16 contain requirements for Porterville to make progress toward controlling these discharges by completing a Wastewater Management Plan and Salinity Source Control Plan. Therefore, it is expected that future discharges of nitrogen and salinity to the underlying groundwater will continue to decrease.

Porterville appreciates the fact that, in developing the tentative WDR and CDO rescission, Regional Board staff recognized and considered the progress Porterville has made in complying with the previous WDR and CDO. The City respectfully requests your careful consideration of our comments and request to trim our groundwater monitoring requirements, in accordance with Title 27.

Sincerely,

CITY OF PORTERVILLE

A handwritten signature in black ink that reads "Baldomero Rodríguez". The signature is written in a cursive style and is positioned over the typed name and title.

Baldomero Rodríguez, P.E.  
Public Works Director

BR:dlo

Enclosures: Tentative WDR Red-lines  
Tentative MRP Red-lines  
Tentative Information Sheet Red-lines  
Attachment D (Reclamation Monitoring Template)

cc: Penny Carlo