

**Regional Water Quality Control Board
Central Valley Region
Board Meeting – 13/14 March 2008**

**Response to Written Comments for City of Porterville
Wastewater Treatment Facility
Tulare County
Tentative Waste Discharge Requirements**

At a public hearing scheduled for 13/14 March 2008, the Regional Water Board will consider adoption of Waste Discharge Requirements for the City of Porterville – Wastewater Treatment Facility. This document contains responses to written comments received from interested parties regarding the tentative Waste Discharge Requirements (WDRs) circulated on 16 January 2008. Written comments were received from:

1. The City of Porterville
2. Carollo Engineers

Comments from the above parties are summarized below, followed by the response of Regional Water Board staff.

CITY OF PORTERVILLE

COMMENT 1: The City spends approximately \$10,000 per quarter on groundwater sampling and analysis of 23 monitoring wells around the wastewater treatment facility, percolation ponds, and reclamation area. The facility is exempt from Title 27 of the California Code of Regulations. The City has made considerable progress to: 1) expand the reclamation area, 2) utilize reasonable agronomic practices, 3) remove buried sludge from the facility, and 4) build new soil cement lined sludge drying beds. Groundwater quality is highly variable around all the areas monitored and more reflective of historic land use practices rather than wastewater disposal or reuse. For the above reasons, the City requests that the monitoring well network be reduced to three wells near the percolation ponds.

RESPONSE: Regional Water Board staff concurs that not all existing monitoring wells need to be continually sampled. However, each area of the facility (i.e., the wastewater treatment facility, percolation ponds, and reclamation area) needs to continue to be monitored. The tentative Monitoring and Reporting Program has been revised to reduce the number of wells to be regularly sampled from twenty-three to nine.

The City of Porterville's consultant, Carollo Engineers, provided comments at an informal meeting with Regional Water Board staff in the form of a marked-up version of the tentative WDRs.

CAROLLO ENGINEERS

COMMENT 1: For the same reasons summarized in the City's comments, reduce the groundwater monitoring well network to three wells near the percolation ponds.

RESPONSE: See response to City of Porterville Comment 1 above.

COMMENT 2: The use of Method Detection Limits (MDLs), and the reporting of estimated concentrations (J Values) are inappropriate for this land discharge.

RESPONSE: Reporting of MDLs and J Values can provide valuable information regarding whether the discharge meets all water quality goals and limits. It can also be valuable in evaluating the performance of analytical laboratories relative to industry standards. However, Regional Water Board staff concurs that is not necessary for routine sampling of most constituents. The tentative Monitoring and Reporting Program has been modified as follows, to allow the City to justify only reporting such data for appropriate constituents (e.g., trace metals or priority pollutants):

Unless exceptions are previously approved in writing by the Executive Officer, all laboratory results shall be reported down to the MDL; non-detected results shall be reported as less than the MDL (<MDL); and results above the MDL, but below the concentration of the lowest calibration standard for multipoint calibration methods or below the reporting limit for other methods shall be flagged as estimated.

COMMENT 3: Because wastewater is not retained in percolation ponds for a substantial amount of time, and because the facility has never had documented odor complaints, do not require monitoring of dissolved oxygen (DO).

RESPONSE: The Pond Monitoring Section of the tentative Monitoring and Reporting Program has been revised as follows to require DO monitoring only in the event of potential nuisance conditions:

If offensive odor is detected by or brought to the attention of WWTF personnel, monitor first affected pond(s) daily until DO is > 1.0 mg/L. Samples shall be collected at a depth of one foot, opposite the inlet to the pond(s). If DO results for any pond in use creates an odor or nuisance, the Discharger shall implement corrective measures as specified in the operations and maintenance manual and monitor said pond daily until its DO stabilizes above 1.0 mg/L. Samples shall be collected between 0700 and 0900 hours.